

## **REPRESENTATIONS MADE ON PRE-SUBMISSION DRAFT LOCAL PLAN AND PROPOSALS MAP**

This document contains full copies of the representations made on the Pre-Submission Draft Local Plan and Proposals Map and other supporting documents, as part of the consultation held between 30<sup>th</sup> November 2017 and 26<sup>th</sup> January 2018.

The representations are shown in this document in alphabetical order. Please use the contents page to navigate, and please note also that page numbers are generally visible on the title page for each representation.

For summaries of the representations, set out in document order, please see the Statement of Consultation on the Pre-Submission Local Plan.

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ALLCOCK, PAUL

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**From:** Paul Allcock  
**Sent:** 26 January 2018 13:37  
**To:** Planning Policy  
**Subject:** EN7N Item EN7Nn

**This is an EXTERNAL EMAIL. STOP. THINK before you CLICK links or OPEN attachments.**  
Reference Mapledurham Playing Fields and the Heights School proposal

Why is the current Local Plan being ignored in favour of RBC supporting the ESFA's proposals to build a school on Mapledurham Playing Fields, which is designated green open space and held in trust exclusively for recreation?

2. How will the new Local Plan be strengthened to overcome future threats to green open space, especially when it is held in trust?
3. In particular how will it safeguard against the following factors, which cannot be mitigated and will significantly impact Mapledurham Playing Fields, if the EFSA proposal is implemented:
  - a. Traffic movements
  - b. Air pollution
  - c. Noise pollution
  - d. Visual dominance and overbearing on the area of the site where they propose to build
  - e. Privacy and overlooking
  - f. Out of character with local residential properties
  - g. Light pollution
  - h. Impact to other users i.e. tennis club, dog walkers, footballers, casual visitors
  - i. Hours of operation
  - j. Reduction to the quality of the environment
4. What plans are there to demonstrate commitment to the current Local Plan and protect Mapledurham Playing Fields from the threat of the EFSA proposal?

Paul Allcock

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ANSELL, JULIAN

Reading Borough Council  
 Pre-Submission Draft Local Plan  
 November 2017  
 Representations Form



Please return by Friday 26<sup>th</sup> January 2018 to: Planning Policy, Civic Offices,  
 Bridge Street, Reading, RG1 2LU or email [planningpolicy@reading.gov.uk](mailto:planningpolicy@reading.gov.uk)

**PART A - YOUR DETAILS**

**Personal Details**

**Agent's Details (if applicable)**

Title

MR.

First Name

JULIAN

Last Name

ANSELL

Job Title (if applicable)

~~Director of Planning~~

Organisation (if applicable)

~~Reading Borough Council~~

Address 1

Address 2

Address 3

Town

Post Code

Telephone

E-mail





**PART B - YOUR REPRESENTATION** (please use a separate form for each representation)

**B1. To which part of the Local Plan does this representation relate?**

SECTION C A1 B

**B2. Do you consider that the Local Plan:** (please tick as appropriate)

Is legally compliant?

Yes

No

Is sound?

Yes

No

Fulfils the duty to co-operate?

Yes

No

**B3. Please provide details of why you think the Local Plan, or part of the plan, is or is not legally compliant, sound and/or complies with the duty to co-operate.**

PLEASE SEE THE ATTACHED DOCUMENT

*Please continue on another sheet if necessary*

## SCTION B3

Inclusion of part of Reading Golf Course, Kidmore End Road in the Reading Borough Plan is unsound for the following reasons:-

1. The area identified is 3.75 ha providing 90-130 dwellings. At present this is a privately owned open space. The Council has an obligation to replace all open space (public and private) if it is used for development. The plan does not include any provision to replace this lost space. The Council has already expressed concerns about air quality in the Reading area and a development such as this would have a significantly detrimental effect on residents. In its response to the potential loss of open space the Council stated that the need for housing meant that the obligation for the protection of undeveloped land could not be met. The area concerned is close to the heart of Emmer Green and this response is not considered adequate, the need to ensure the health of residents must be the first consideration.
2. An application to South Oxfordshire District Council (SODC) for a development by Gladman Homes of land off Peppard Road for 245 residential dwellings has been comprehensively opposed by the Council and, in the appeal statement dated December 2017, a number of points were raised all of which are also relevant to the proposed inclusion of the land owned by Reading Golf Club:-

References are to the appeal statement.

1.1 'an unfortunate precedent for unplanned development on the boundary of the Borough with unforeseen detrimental impact on the infrastructure.'

1.2 'an area where Infrastructure is already under severe pressure.'

2.4 'access across the River Thames within Reading is restricted to 2, single lane bridge crossings which operate at full capacity at peak travel times'.

2.12 'school capacity in the area is very tight and would not support further substantial additional development.'

4.6 'the capacity of the Peppard Road/Buckingham Drive roundabout junction exceeded capacity following the Arcady assessment....'

4.26 'Reading Borough have concerns over air quality...'

It is considered disingenuous for the Council to include such statements in its opposition to the Gladman Development but at the same time to ignore them by including the Reading Golf Club land in its own local plan.

3. The responses by the Council to the points raised in opposition to the inclusion of the Reading Golf Club land in the Local Plan were inadequate and the Council has failed to set out specific proposals to deal with the problems which they themselves have identified in the points noted under section 2 above.
4. At the most recent meeting of the members of Reading Golf Club when the proposal to develop land owned by the Club was discussed, the members voted overwhelmingly to reject the plan. No open land to replace the lost open land has ever been identified as available and a request to SODC to include land owned by the Club in their Strategic Housing and Economic Land Availability policy was turned down in October 2017 as not being in accordance with special strategy (copy notice attached).

SODC RETURN

PART OF STRATEGIC HOUSING AND ECONOMIC LAND AVAILABILITY  
OCTOBER 2017

PAGE 42

SHELAA number	<b>71</b>			
Site name	Land at Reading Golf Club			
Parish	Kidmore End			
Site size (ha)	31.75			
Source	Submitted Site			
Current use	Recreation and leisure - open [G]			
Site description	The site is undeveloped Golf course			
Known contamination / ground stability issues	Within borehole safeguarding area			
Heritage	The site does not include any heritage assets.			
Ecology	Ancient woodland, BAP priority habitat, local wildlife site, protected species buffer zone			
Access to site				
Neighbouring characteristics	Residential [PDL] Agricultural [G]			
Within / adjoining Conservation Area	No			
Green Belt (%)	0			
AONB (%)	0			
% of site within Flood Zone 3 (a and b):	0			
Planning history	N/A			
Market Attractiveness	High			
<b>Suitable</b>	<b>Yes</b>			
<b>Available</b>	<b>Yes</b>			
<b>Achievable</b>	<b>Yes</b>			
Suitable for housing	Yes			
Yield housing	479			
Phasing:	0-5 years	6-10 years	11-15 years	16+ years
	110	275	94	0
Suitable for employment	No			
Yield employment (sqm)	-			
Suitable for Travellers				
Yield Travellers (no. of pitches)	-			
Net Developable Area (ha)	19.168			
Notes/other 1	Not in accordance with spatial strategy but recognise its proximity to built area of Reading. Capacity is also on a significantly smaller scale than those of the strategic sites. 7% of the site is covered by Ancient Woodland (Ref 021063)			
Notes/other 2				

B4. Please set out the modifications that you think would make the Local Plan, or part of the plan, legally compliant and/or sound. Please provide specific wording where possible.

REMOVAL OF SECTION C A I B FROM THE PLAN.

Please continue on another sheet if necessary

B5. If you are seeking a modification to the plan, do you wish to appear in person at the public examination?

Yes  No

B6. If you wish to appear in person, please briefly outline why you consider this necessary.

TO PRESENT THE CASE FOR REMOVAL AND TO DRAW ATTENTION TO THE LONG TERM EFFECTS UPON EMMER GREEN

B7. Do you wish to be kept informed of planning policy matters?  
(please tick as appropriate)

Please keep me informed of the progress of this Local Plan:

Please keep me informed of all planning policy matters:

APPLETON, PATRICIA

---

**From:** The Appletons  
**Sent:** 26 January 2018 19:26  
**To:** Planning Policy  
**Subject:** Pre-Submission Draft Local Plan Consultation

**This is an EXTERNAL EMAIL. STOP. THINK before you CLICK links or OPEN attachments.**

**To whom it may concern**

Submission by Patricia Appleton

Re:Draft Local Plan: part relating to "Local Green Space and Public Open Space"

It is difficult, without detailed knowledge of the relevant legislation/requirements to make specific comment on the meeting of any tests of soundness, legality and/or whether any duty to co-operate has been complied with in regard to the draft.

I would like, however, to support the justification/soundness of any measures to taken in the draft Local Plan to protect local green space in Reading, including using the local green space designation, in particular with regard to Mapledurham Playing Fields which is local to me (and which includes one of the few areas of playing fields in this area which are not either under school control or subject to flooding).

Reading has gone and is going through extensive development and it is essential to ensure that this is sustainable by ensuring that there is no further erosion of publicly/freely accessible/usable green space and that existing green spaces/recreational facilities are preserved and improved.

Reading has an obesity problem, which puts lives at risk and pressure on our hard pressed health services <http://news.reading.gov.uk/council-sets-out-position-on-tackling-obesity-in-reading/>. In addition open spaces are essential to improving air-quality and general well-being. We need to invest in maintaining open spaces and associated leisure facilities and making open spaces attractive to, and entirely accessible to, the public at large. This includes ensuring that, as a minimum, public toilets are available so that people from the widest possible community can access them (not just those who can pop home to use the toilet). Many parts of London, by example, have lots of green spaces with attractive leisure amenities - making them more likely to be used.

Having made these designations it is important that the Council/planning do not simply play lip service to them. Once public green space is lost the opportunity to recover/replace it is unlikely ever to arise (or be affordable).

I would like to be kept informed of the progress of the Local Plan.

Many thanks for your attention

Regards

Patricia Appleton

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ARTHUR HILL - SAVE OUR SWIMMING C.I.C





Arthur Hill – Save Our Swimming CIC  
35 – 39 London Street  
Reading  
RG1 4PS

Planning Policy Team  
Reading Borough Council  
Civic Offices  
Bridge Street  
Reading  
RG1 2LU

By email to [planningpolicy@reading.gov.uk](mailto:planningpolicy@reading.gov.uk)

18 December 2017

Dear Madam / Sir,

### CONSULTATION ON PRE-SUBMISSION DRAFT LOCAL PLAN ARTHUR HILL POOL SITE

Arthur Hill – Save Our Swimming Community Interest Company would like to make the following comments in response to the Pre-Submission Draft Local Plan published by Reading Borough Council.

On 14 June 2017 we wrote to Reading Borough Council to make a number of points in relation to the Arthur Hill Pool site at 221-5 London Road, RG1 4LS. We opposed development on the site for housing purposes as was proposed in the Draft Local Plan. A petition with around 600 written and electronic signatories opposing development on the site was presented to the Council's Policy Committee meeting on 17 July 2017 (electronic version online at <https://www.change.org/p/reading-borough-council-keep-the-arthur-hill-site-for-community-use>).

We are disappointed, but not at all surprised, that Reading Borough Council has apparently ignored these submissions and has retained the proposal for housing development on the Arthur Hill site unamended in the Pre-Submission Draft Plan.

We would therefore like to once again repeat our original objection to development of the Arthur Hill site and make the following points:

- The company wishes to OBJECT to the proposal to change the land use category of the Arthur Hill site to allow residential development (Policy ER1h, page 208).
- We remind the Council that the Arthur Hill site was donated to the local community for the benefit of the general public, and it is not appropriate for the Council to sell the site for private development.





**Arthur Hill – Save Our Swimming CIC**  
**35 – 39 London Street**  
**Reading**  
**RG1 4PS**

- We request that policy ER1h and all references to the Arthur Hill site be deleted from the Local Plan. The current land use for the site should be retained, and the site should continue to be used for leisure, sporting, and community activities.
- We do not support the local listing of the frontage to the Arthur Hill Pool building at the current point in time. The external features of the building have limited heritage value and it is the internal arrangement of the pool, with cubicles surrounding the main pool, which gives the building its appeal and make it attractive to particular user groups, such as swimmers with disabilities.
- We also consider that the proposal to build between six to ten dwellings on the site would alter the character of the local neighbourhood and would add unacceptably to noise, traffic nuisance and parking problems in Norwood Road and Rupert Street.
- We consider that at this point in time options for the future of the Arthur Hill site should be kept as open as possible, and actions which might constrain the future of the site should be avoided.
- We would like to point out that the proposed development of a new swimming pool in Palmer Park (Policy ER1) would contravene current Council policies for development on public open space, and no proposals are made for an equivalent area of land to be provided as new open space locally in compensation for loss of space in Palmer Park. No effort has been made to work with neighbouring authorities to consider alternative sites or options for provision of a new swimming pool.

Given that comments made in previous rounds of consultation over the Local Plan have not been taken into account in preparation of the Pre-Submission draft, we consider that the Local Plan is NOT legally compliant, is NOT sound, and does NOT fulfil the duty to co-operate.

We wish to make further representations during the public examination of the Local Plan and wish to appear in person at the public examination.

Please keep us informed of arrangements for consultation and examination of future drafts of the Local Plan. We reserve the right to raise further objections on wider grounds at future stages of the planning process.

Please do not hesitate to contact me if you require any further information or have any questions.

Yours faithfully,

Peter Burt  
Company Secretary

ASQUITH, DR PETER

---

**From:** Peter Asquith  
**Sent:** 24 January 2018 17:57  
**To:** Planning Policy  
**Subject:** Re Plan for Mapledurham Playing Fields

**This is an EXTERNAL EMAIL. STOP. THINK before you CLICK links or OPEN attachments.**

I understand that a new Local Plan is being developed which may offer less protection for the Park, which is a designated green open space and held in trust exclusively for recreation, having been kindly donated by a local citizen for the benefit of local residents.

Will this plan overcome any future threats to the open space, on which any building or development should be prevented?

One in 3 primary age children are obese and it is crucial that their welfare should be protected and encouraged.

Yours sincerely, Dr Peter L Asquith

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## AVIVA LIFE AND PENSIONS

Planning Policy Team,  
Reading Borough Council  
Civic Offices  
Bridge Street  
Reading RG1 2LU

By email: [planningpolicy@reading.gov.uk](mailto:planningpolicy@reading.gov.uk)

17127/A3/SD  
26<sup>th</sup> January 2018

Dear Sir/Madam,

**READING BOROUGH COUNCIL  
REGULATION 19 CONSULTATION  
PRE-SUBMISSION DRAFT READING BOROUGH LOCAL PLAN  
REPRESENTATIONS MADE ON BEHALF OF AVIVA LIFE AND PENSIONS UK Ltd.**

We write on behalf of our client, Aviva Life and Pensions UK Ltd., (Aviva Investors) in response to Reading Borough Council's (RBC) Draft Local Plan. Our client, Aviva Investors, owns a number of sites within the borough. This letter refers to their land at Reading Station Shopping Park, Forbury Retail Park Phase 3 and 52-55 Friar Street and 12 Greyfriars Road.

Our client fully supports the objective and principle of putting in place an updated Local Plan that will help to continue to bring about positive change in the borough. The Local Plan, once adopted, should present an integrated vision but based on individual land owners and developers bringing forward their own sites for development on different timescales, when appropriate.

We have the following comments on the draft Local Plan.

Policy CC1 Presumption in Favour of Sustainable Development

Aviva welcomes the recognition of the role of NPPF and other national guidance upon the Local Plan preparation and that there will be a positive approach to considering development proposals.

Policy CC2 Sustainable Design and Construction

We consider that this policy should explain in greater detail that there may be a need to take a flexible approach and ensure that this policy does not preclude high quality development being brought forward. The policy should be amended to allow applicants to demonstrate that the standard they propose to achieve is the highest possible for the development as this will reflect the complicated nature and conflicting demands some sites face when being redeveloped.

Policy CC7 Design and the Public Realm

As raised in the previous consultation response it would be helpful to the understanding, clarity, and application of the policy if definitions of "high design quality" and "major developments" are provided in the supporting text.

Policy CC8 Safeguarding Amenity

We consider this is an important policy. Particularly within the town centre, where density is



higher and issues of overlooking, amenity, and overshadowing etc. are most sensitive.

Aviva welcomes the more considered approach proposed in policies (CR11 iii and CR13 ii) to ensure that neighbouring sites respect each other and enable equitable development of different parcels to take place, rather than a first to secure planning permission "takes all", However we consider that this wording should be incorporated and made explicitly clear within this policy for consistency.

#### Policy CC9 Securing Infrastructure

The draft policy proposes that any employment development (not defined) should mitigate its impacts on housing demand. The policy wording would indicate that the LPA may seek a financial contribution from "employment" schemes to pay for residential development (including affordable housing). As a matter of principle, we disagree with this linkage. It is considered overly onerous and tenuous to suggest that non-residential development should be expected to meet worker's needs. It is out of scale and proportion and is considered unjustifiable.

#### Policy EM1: Provision of Employment Development

We note that the provision of officer floorspace has increased from 53,000-119,000 sq m of office floorspace since the previous consultation in June 2016. We do not consider this draft policy is beneficial and so recommend its entire deletion.

The objective of the planning system, set out in the NPPF, is to stimulate economic development and not frustrate it. The concept that a developer proposing otherwise acceptable economic development may need to directly provide or fund provision of housing (including affordable housing) to mitigate the impacts of its economic development proposals, otherwise planning permission will not be granted, seems likely to negatively impact on the economic performance of UK Plc and run counter to national planning policy.

#### Figure 5.1

Whilst the principle behind the purpose of the figure is supported, the graphics and the scale of the plan, even when read alongside paragraphs 5.2.11-5.2.4, result in some uncertainties over interpretation. These uncertainties were raised in June 2016 during the previous consultation and the plan remains unchanged.

We consider that Figure 5.1 should be clarified as for example, we note that land north of Reading Station is not entirely covered by "for retail" or "for offices" and Forbury Retail Park only partially lies within a concentration "for retail".

#### Policy H2: Density and Mix

Aviva welcomes the clarification that indicative densities are provided and recognises that a different density may be appropriate.

#### Policy H3: Affordable Housing

Aviva supports the National Planning Policy Framework (NPPF) Paragraph 173 which defines viable development as that which provides a competitive return to a willing land owner and willing developer and is deliverable. As such, the NPPF considers contributions for affordable housing should not impede the viability and delivery of development.

It is considered that greater explanation should be provided in this document and that the Affordable Housing SPD should be updated as a priority as the policy fails to mention how it intends to deal with changes that may be brought forward on a National level.

We consider that the policy should contain greater references to the explanatory text provided such as paragraph 4.4.23 which states that *"the Council will be sensitive to exceptional costs of bringing a site to market such as for reasons of expensive reclamation, or infrastructure costs, or high existing use values. Where applicants can demonstrate,*

*to the satisfaction of the Council, exceptional difficulties in bringing a site to market, the Council will be prepared to consider detailed information on the viability of a particular scheme and, where justified through an open book approach, to reduce the affordable housing requirement. As development costs are usually reflected in the residual land value, the purchase price of a particular site will not, on its own, be a reason for reducing the affordable housing requirement. The Council will generally secure provision of affordable housing through a Section 106 agreement."*

Aviva welcomes and support the move towards transparency and openness in the viability process, but we consider that this must not be at the expense of disclosing commercially sensitive information. There is concern raised with the current wording of the policy at present, which states *"In all cases where proposals fall short of the policy target as a result of viability considerations, an open-book approach will be taken and the onus will be on the developer/landowner to clearly demonstrate the circumstances justifying a lower affordable housing contribution."*

Many viability assessments include information which is commercially sensitive. For example, this could include allowances for the acquisition of third party land, rights of light, vacant possession, compensation costs or other information that would severely compromise the applicant's commercial position. If there are elements of the information within the assessment which the applicant considers should not be disclosed on the basis that they are commercially sensitive, and they have provided reasoned justification for this then this information should be redacted.

We consider that there should be no general assumption of sharing commercially sensitive viability information without express permission from applicants even without the submission of such justification provided by the applicant. We are concerned about the adverse effect that incorrect disclosure could have on applicants. As such, we consider that the policy should be clarified and include reference to ensure that the Council notifies the applicant of any Freedom of Information (FOI) requests and if the disclosure is agreed to by the applicant then the process can be managed accordingly.

Given the complexity and evolving nature of viability assessments, we consider that they should only be submitted when key aspects of the proposed scheme have been finalised, unless (as indicated above) the viability will influence the Council's approach to design etc. It should be recognised that applications for major developments, especially for outline and hybrid schemes will evolve as a result of continued discussions and feedback from consultation, including statutory consultees.

We would welcome the Council's acknowledgement that development schemes will evolve post submission and the viability assessment will also need to evolve in response.

#### Policy CR1 Definition of Central Reading

Aviva supports the policy, which seeks to define the Central Area boundary and provide a clear definition for town centre uses. We note in the supporting text (paragraph 5.3.4) that support will be provided for a mix of uses coming forward on sites within the designated area.

#### Policy CR2: Design in Central Reading

Aviva welcomes the policy which seeks to encourage good quality design within new the central area of Reading. In particular, policy CR2f is welcomed in that *"Development should be designed with consideration of adjacent development sites and should not prevent or cause unreasonable burdens on the future development of those sites."*

#### CR3: Public Realm in Central Reading

We consider an element of flexibility should be introduced into policy CR3i. The policy should read "Except in exceptional circumstances...."



CR6: Living in Central Reading

Aviva welcomes the policy, which was integral to the Central Area Action Plan, and recognises that the provision of residential development can help to diversify the centre and help support its long-term viability through an increase in population in the centre.

Policy CR10 Tall Buildings

Aviva welcomes the policy, which was integral to the Central Area Action Plan, and encourages provision for additional tall buildings in specific parts of the centre. Aviva welcomes the criteria in CR10a (ii) and (v) that sets out the framework for tall buildings in the area and is pleased that the Council acknowledges that tall buildings are not appropriate in all locations within the centre, but that they are best located in accessible locations such as in the area around the Reading train station.

Policy CR11: Station/River Major Opportunity Area

Aviva broadly welcomes Policy CR11. As a major landowner in the Opportunity Area (CR11b) and (CR11e) Aviva has been very supportive in the past of the Council's Reading Central Area Action Plan (AAP) and the subsequent Reading Station Area Framework (Framework). Aviva see this as an appropriate (flexible) 'blue print' for the future of this part of Reading that takes advantage of its locational benefits. Aviva operates a successful retail park and the lease structures mean that comprehensive redevelopment is more likely to be towards the middle of the plan period.

We consider that the development of the wider station area allows the significant improvement of north-south links through the centre and offers the opportunity to expand the core of the centre northwards to help meet development needs of Reading. As such, Aviva supports the Council's view that for the development of these areas to be successful then developments must benefit from improved accessibility by public transport, and improved permeability for pedestrians and cyclists, particularly in a north-south direction to help change the perception of the area north of the station as a separate entity. We support the acknowledgement that the area can ***"Contribute towards providing a high-density mix of uses to create a destination in itself and capitalise on its role as one of the most accessible locations in the south east. Development for education will be an acceptable part of the mix"***.

Aviva welcomes the acknowledgement that the indicative development capacity are to provide an indication only and that this density can increase and will not preclude higher densities being brought forward if they create high-quality well designed schemes (paragraph 5.4.6) and also that the area around the station is considered ***"appropriate for well-designed tall buildings, in line with the policy on tall buildings (CR10), and the area will be developed at a higher density even where there are no tall buildings"*** (paragraph 5.4.8).

We welcome the balanced approach to flood risk. The acknowledgement that whilst part of the allocation lies within Flood Zones 2 and 3a but that this consideration must be weighed against the vital role that these sites can play in the regeneration in the centre area of Reading, is supported.

With the above in mind, Aviva's starting point is to be supportive in principle of the proposals shown in Figure 5.3. As noted in earlier representations Aviva considers it important for the ultimate completion of regeneration across the Major Opportunity Area that as sites are likely to be brought forward at different timescales and by different site owners and be subject to piecemeal planning applications and that such individual applications should not prejudice the ability of adjoining owners to bring forward schemes in a coordinated and controlled way.

Aviva considers it important that such development of these area does not cause one land owner to bear a disproportional amount of open space than other developers, or by the land use and placement of buildings on the edge of land plots result in a full stand-off being required to be absorbed by a land owner yet to bring forward its own proposals.

Aviva welcomes the inclusion of policy **CR11 viii** which seeks to avoid such an inequitable approach and states that applications should *"viii) Demonstrate that it is part of a comprehensive approach to its sub-area, which does not prevent neighbouring sites from fulfilling the aspirations of this policy, and which contributes towards the provision of policy requirements that benefit the whole area, such as open space"*.

To omit such policy wording would be inequitable to landowners, as it would mean the first developer would achieve a minimal mitigation package or provision of public realm, whilst subsequent developers would be liable for greater mitigation.

#### Policy CR 13: East Side Major Opportunity Area

Aviva welcomes Policy CR13, and as a major landowner in this Opportunity Area (CR13b/c), Aviva has been very supportive in the past of the Council's Reading Central Area Action Plan (AAP).

The principle Aviva wish (as with the earlier allocation) is to raise the need for fairness and equality in seeking the development of the allocations. Landowners are reliant on the LPA ensuring that each development being brought forward within the allocation will be responsible for its fair share of mitigation and provision of public realm, whilst not prejudicing the appropriate development potential of individual sites through individual scheme designs. As with their comments on Policy CR11 Aviva welcomes the inclusion of **CR13 vii** which seeks to avoid such an inequitable approach and states that applications should *"viii) Demonstrate that it is part of a comprehensive approach to its sub-area, which does not prevent neighbouring sites from fulfilling the aspirations of this policy, and which contributes towards the provision of policy requirements that benefit the whole area, such as open space"*.

To omit such policy wording would be inequitable to landowners, as it would mean the first developer would achieve a minimal mitigation package or provision of public realm, whilst subsequent developers would be liable for greater mitigation.

#### Summary

Aviva is supportive in principle of the aspirations of the replacement Local Plan and the continued identification and support of the allocations and strategy impacting upon its two main land holdings, subject to the comments above being incorporated into future iterations.

We request that we be kept informed of progress with this and future planning policy documents and reserve our client's position to submit further representations.

We trust our comments are helpful and highlight that Aviva welcomes the opportunity to discuss any aspect of these representations with you.

Yours faithfully,

**ROBIN MEAKINS**  
Senior Planning Partner

AYRES, ANNE

---

**From:** anne ayres  
**Sent:** 24 January 2018 18:50  
**To:** Planning Policy  
**Subject:** Draft Local Plan Section EN7N Item EN7Nn

**This is an EXTERNAL EMAIL. STOP. THINK before you CLICK links or OPEN attachments.**

Dear members of planning policy

I would like to raise the following questions with regard to the proposal to build a school on Mapledurham Playing Fields.

1. Why is the current Local Plan being ignored in favour of RBC supporting the ESFA's proposals to build a school on Mapledurham Playing Fields, which is designated green open space and held in trust exclusively for recreation?
2. How will the new Local Plan be strengthened to overcome future threats to green open space, especially when it is held in trust?
3. In particular how will it safeguard against the following factors, which cannot be mitigated and will significantly impact Mapledurham Playing Fields, if the EFSA proposal is implemented:
  - a. Traffic movements
  - b. Air pollution
  - c. Noise pollution
  - d. Visual dominance and overbearing on the area of the site where they propose to build
  - e. Privacy and overlooking
  - f. Out of character with local residential properties
  - g. Light pollution
  - h. Impact to other users i.e. tennis club, dog walkers, footballers, casual visitors
  - i. Hours of operation
  - j. Reduction to the quality of the environment
4. What plans are there to demonstrate commitment to the current Local Plan and protect Mapledurham Playing Fields from the threat of the EFSA proposal?

I look forward to your comments.

Anne Ayres

Click [here](#) to report this email as spam.

AYRES, ROBERT

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**From:** Robert Ayres  
**Sent:** 26 January 2018 18:31  
**To:** Planning Policy  
**Subject:** reference the draft Local Plan Section EN7N Item EN7Nn

**This is an EXTERNAL EMAIL. STOP. THINK before you CLICK links or OPEN attachments.**

1. Why is the current Local Plan being ignored in favour of RBC supporting the ESFA's proposals to build a school on Mapledurham Playing Fields, which is designated green open space and held in trust exclusively for recreation?
2. How will the new Local Plan be strengthened to overcome future threats to green open space, especially when it is held in trust?
3. In particular how will it safeguard against the following factors, which cannot be mitigated and will significantly impact Mapledurham Playing Fields, if the EFSA proposal is implemented:
  - a. Traffic movements
  - b. Air pollution
  - c. Noise pollution
  - d. Visual dominance and overbearing on the area of the site where they propose to build
  - e. Privacy and overlooking
  - f. Out of character with local residential properties
  - g. Light pollution
  - h. Impact to other users i.e. tennis club, dog walkers, footballers, casual visitors
  - i. Hours of operation
  - j. Reduction to the quality of the environment
4. What plans are there to demonstrate commitment to the current Local Plan and protect Mapledurham Playing Fields from the threat of the EFSA proposal?

Robert Ayres  
Caversham Resident

Click [here](#) to report this email as spam.

B.B.C.

26<sup>th</sup> January 2018

Planning Policy  
Reading Borough Council  
Civic Offices  
Bridge Street  
Reading  
RG1 2LU

T +44 (0)20 7198 2000  
F +44 (0)20 7198 2001  
[www.lsh.co.uk](http://www.lsh.co.uk)  
**Lambert Smith Hampton**  
United Kingdom House  
180 Oxford Street  
London  
W1D 1NN

Dear Sir or Madam,

**Representations on behalf of British Broadcasting Corporation (BBC) to the Pre-Submission Draft Reading Borough Local Plan (November 2017)**

Lambert Smith Hampton is instructed by the British Broadcasting Corporation (BBC) to make formal representations with regards to their land holding at Caversham Park as identified and referred to within the Reading Pre-Submission Draft Local Plan (November 2017), specifically at Policy CA2: Caversham Park.

This representation is made on the grounds that the Pre-Submission Draft Reading Borough Local Plan (November 2017) as currently drafted is unsound. The reasons for this are set out below.

**BACKGROUND**

This representation relates to Policy CA2: Caversham Park, land over which the BBC is Freeholder at the time of this submission. The BBC is in the process of vacating the site as their operations at the facility are coming to an end and are therefore selling the land and at this point in time, prospective purchasers are engaged in a formal bidding process.

In order to establish the next use for Caversham Park after the BBC's operations have ceased and the site has been vacated; and to ensure a sustainable, viable future (which by default requires considerable investment), the BBC instructed Lambert Smith Hampton to assemble a design team to enter into formal pre-application discussions with Reading Borough Council to discuss the development potential of the site.

This formed part of a due diligence exercise to establish an optimal use of the site based upon what is considered to be a realistic amount and type of development that can be achieved, subject to obtaining the necessary consents.

To reach this position, development/design feasibility options were taken through two stages of formal pre-application engagement with Reading Borough Council and one round of pre-application engagement with Historic England (formerly English Heritage).



The design work undertaken was informed and influenced by an assessment of transport and highways implications of new development, the ecological constraints on the land and the historical significance of the site which is identified as a Listed Building and Historic Park and Garden under the Planning (Listed Buildings and Conservation Areas) Act 1990.

Well aware of these constraints, particularly focused on heritage related matters, the design work undertaken took into consideration all of the heritage assets on the site, both as individual assets and collectively having group value; with these including the Grade II Listed Caversham House, Caversham Park (Grade II Registered Park and Garden), the Grade II Listed Inner Park Walls, the Grade II Listed Entrance Gate and Gate Piers into the Park and the Temple to the west of Caversham House (also Grade II Listed).

The design feasibility options presented to Reading Borough Council via the pre-application route were indeed sensitive towards these constraints.

LSH first met with Officers in December 2016 following the submission of a formal pre-application request to RBC in November. The scheme put forward made provision for a total number of 265 residential units to be developed on the land, informed by discussions and assessments undertaken by a multidisciplinary team including, in addition to planning, Turley Heritage advising on particular significance of the heritage assets, JMP Consultants advising on traffic, transport and highways related matters and Aspect Ecology guiding on habitats and ecological matters.

As part of these proposals, the Grade II listed House would be renovated and converted to provide 47 residential units; the former gatekeeper and staff houses would also be converted to C3; and 220 additional dwellings would be provided on the site.

The initial proposals raised concerns at Officer level, in particular with regards to the quantum of development on the site and heritage impact. The scheme was subsequently revised to reduce the total quantum to 189 units in total; in addition a full Tree Survey and Arboricultural Impact Assessment were undertaken and used to inform the revised scheme including: retention of the Orchard and reduction and revisions to the number and layout of the units within the confines of the Registered Park and Garden (RPG) to respond better to the surrounding context and to reduce its impact on the setting of the Listed Building.

A follow-up meeting took place on 29th March 2017 where Officers confirmed that the changes made constituted a significant improvement and that while the key consideration for any future application coming forward will be the impact of the proposals on the setting of the listed building and grounds, the proposals as updated represented 'less than substantial harm' and would need to be weighed against the public benefits of the scheme. These could include landscape enhancements, habitat and ecological enhancements, delivery of housing (unit types and sizes) identified to be needed and restoration of the house and grounds with the potential to improve public access/enjoyment.

The Council also confirmed that the site in its current state does not provide optimal conditions for protected species and therefore any impact on existing biodiversity could be managed through suitable mitigation and enhancement. Officers also confirmed that the scheme reviewed was broadly acceptable in transport and highways terms and that on the whole any environmental impacts (trees, ecology, highways) could be resolved.

During the pre-application discussions with RBC, officers accepted that any proposals coming forward on this site would need to include an element of residential within the grounds of the house, not exclusively on the previously developed parts of the site. Indeed, all the tender submissions considered by the BBC included varied levels of additional development in the park, north of the house. This demonstrates that no interested parties considered that the conversion of the house on its own would be viable without the need for additional development on the grounds.

We welcome the policy support within the Pre-Submission Local Plan for the change of use of the historic house from offices to an alternative use but note that this is restricted to “residential and/or a cultural, community or heritage use, where we believe this should also include hotel and retirement accommodation uses which are both compatible uses with the building; and we note that development is restricted by limiting new development on previously developed land within the site.

We are seeking amendments to policy CA2 in order to promote a recognised national government desire to deliver housing in sustainable locations. Critically we are concerned about the restrictive nature of the policy, given that it is not supported by a robust evidence base or due diligence exercise which seeks to highlight which elements of the site are of particular interest; it therefore assumes that any additional development would necessarily have a negative impact on heritage, landscape, trees and views when in reality discussions with Officers to date have highlighted that there are clear opportunities for heritage, landscape and biodiversity enhancements, and that adequate access onto the site can be secured.

#### **CURRENT WORDING OF POLICY CA2: CAVERSHAM PARK**

The current Policy concerning Caversham Park is drafted as follows:

*“Caversham Park and Caversham Park House are key features of the heritage and landscape of Reading. Caversham Park is a Registered Historic Park and Garden, and the site contains a number of listed features. These assets will be conserved.*

*Conversion of the house from offices to residential and/or a cultural, community or heritage use will be acceptable if it sustains the significance of the listed building. It is estimated that up to 40-45 dwellings could be accommodated, but the figure will be dependent on more detailed historic assessment of the building and the precise mix of uses.*

*Any development or conversion proposals should open as much of the park as possible up to public access, including reinstatement of historic public footpaths.*

*This policy does not allocate the site for additional development over and above conversion of the house. There may be scope for some limited development on previously developed land within the site, which will need to be justified at application stage. Such development must comply with the criteria below:*

- *No development will harm the historic interest or the important landscape value of the site.*
- *Development will not detrimentally affect protected trees or areas of biodiversity importance.*

## **REASONS POLICY IS CONSIDERED TO BE UNSOUND**

The National Planning Policy Framework (NPPF) under the heading 'Examining Local Plans', paragraph 182 states that a Local Plan will be examined by an independent Inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements; and whether it is sound.

In order to be 'sound', the Local Plan needs to be:

- **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

In this instance, the Local Plan is considered to be unsound where Policy CA2 is worded in a manner where it can be used to obstruct sustainable development that will help the Borough meet the objectively assessed development needs with particular regard to housing, including unmet requirements from neighbouring authorities and London.

The Berkshire County Council published (2016) Berkshire (including South Bucks) Strategic Housing Market Assessment (SHMA) which considers 'objectively assessed need' for housing against Reading Borough Council's own 2012 based (Core Strategy) housing projections.

The SHMA noted that the Core Strategy based projections suggested that the Borough requires 541 new homes per annum to accommodate the estimated 11.4% population growth across the plan period up to 2026.

The SHMA also noted however that with the inclusion of factors including London migration uplift, economic uplifts and the uplift in the numbers required to address affordability issues, the objectively assessed need for Reading's housing over the period of 2013-2036 was estimated to be 699 new dwellings created per annum.

Whilst it is noted that the SHMA does not set defined housing requirements for Reading Borough Council, it does instead provide an objective assessment of the need for housing. This does not take into consideration constraints such as planning policies which may or may not conflict with achieving these targets.

Indicator 9 in the SMHA shows a five year housing land supply measured against Core Strategy targets (total requirement of 2,681 homes for 5 years 2016/17-2020/21), while Indicator 10 shows a five year housing land supply measured against objectively assessed need (total requirement of 3,756 homes for 5 years 2016/17-2020/2021). The total site- specific supply for 5 years is at present 4,516 homes which represents a 6.01 years supply.

Whilst the Council's 6.01 years supply of housing when measured against objectively assessed needs seems a reasonable supply, albeit not as strong as when measured against the Core Strategy targets, the needs are likely to change as a result of a range of factors which include, but are not limited to;

- Increased employment in Reading;
- Growth of student population due to growth of Reading University (with potential increases in numbers staying in Reading after completion of academia);
- Arrival of Crossrail services towards the end of 2019, improving connectivity with London; and
- Population growth across the South East of England.

The report does not expect there to be issues in meeting the 10,930 dwellings target by 2026 through existing permissions and Local Plan allocations, in fact the expectation is that this will be exceeded, however it acknowledges that meeting the objectively assessed needs identified (699 homes per year) beyond the 6.01 years will be considerably more challenging.

This takes into consideration that whilst a five year land supply against this target can be demonstrated, there is a lack of any currently identified specific supply in the last ten years of the period. It notes (paragraph 7.11) that work on the Local Plan will seek to identify sites for development up to 2036 and will indicate whether this level of need can be accommodated.

Aside from the total numbers, an additional challenge identified within the report is that there is a continued, very substantial need to secure additional affordable housing, with the results of the Berkshire Strategic Housing Market Assessment showing that there is a need for 406 affordable dwellings per annum.

It also points out that when asking the question “are (housing) policies fulfilling their purpose?” specifically referring to ‘ensuring a mix of housing in Reading and avoiding dominance of small units and flats’, the largest proportion of new permissions are still flats rather than houses, and are smaller rather than larger units.

This is not surprising given that the vast majority of new homes permitted since 2013 are changes of use, many of which are not subject to the need to apply for planning permission due to Permitted Development rights. The findings demonstrate that there are considerable challenges in delivering larger, family sized houses in the Borough.

These issues have influenced the proposed schemes presented for pre-application discussions with Reading Borough Council, with the homes proposed being family sized houses (not flats) with a mix of terraced houses, semi-detached houses and detached houses.

In addition to the above, we are concerned that the current strategy does not provide a solid foundation for meeting housing needs within Reading Borough. The Duty to Cooperate Statement includes a Memorandum of Understanding in relation to Reading’s unmet housing need.

It is anticipated that the unmet need would be accommodated within Wokingham Borough or West Berkshire, however, they are at an earlier stage of plan making and there is no firm commitment that this need can or will be accommodated; the MoU only confirms that the need ‘should’ be met within the Housing Market Area (Para. 2.1 (B)). This is not considered to be a sound approach to housing delivery and the duty to cooperate. Furthermore, Wokingham Borough is constrained by green belt to the east and West Berkshire is largely constrained by the North Downs Area of Outstanding Natural Beauty (AONB). Within Berkshire, Reading is therefore the most sustainable location to provide housing to meet the needs of the HMA.

The provision of housing within sustainable locations is a core principle of the NPPF (paragraph 17). We believe it is critical that the Council reviews sites within the boundary of Reading that could sustainably contribute to the housing land supply in the Borough, such as Caversham Park.

We therefore consider that the Council is placing too much certainty on the potential for neighbouring authorities to accommodate the unmet need. The Caversham Park site offers an opportunity to provide additional housing within the boundaries of Reading Borough. This provides greater certainty over the delivery of housing and ensures that Reading Borough has gone as far as possible to meet its own housing requirements.

The Housing White Paper (published February 2017) set out a number of objectives for supporting housing growth; making efficient use of developable land, providing homes within the right locations, removing delays with the delivery of homes and providing the right types of homes to suit the community. Following the Autumn Budget 2017 it is clear that the Government’s priority remains the delivery of housing at pace and at scale in response to the housing crisis.

The Housing White Paper proposes changes to the NPPF to support propositions that would maximise density on underused sites. Specifically, a proposal at the Caversham Park site would meet the following objectives:

- Make efficient use of land within the Borough boundaries to reduce the reliance on adjacent authorities to deliver the housing requirement
- Address the identified mix of housing needs within RBC, at a density that reflects the site's location whilst acknowledging the importance of the heritage assets
- Ensure that the density and form of development reflect the character, accessibility and infrastructure capacity of an area

Importantly, the Housing White Paper states that the NPPF will be amended to make it clear that plans should *"take a flexible approach in adopting and applying policy and guidance that could inhibit these objectives"*. Technical due diligence has been undertaken on the site and there have been pre-application meetings in relation to new build development proposals. It is clear from these discussions that there is a way forward for a design solution that would respect the heritage and landscape character of the site, whilst accommodating some new build development.

These issues will be explored further through the planning application process and we are confident that a viable, deliverable and sensitive solution will be achieved. It is therefore critical that the underpinning policy position for the site neither inhibits the principle of increasing density nor the flexibility for the design to consider a range of options for the site to deliver a viable mixed use development proposal that respects the site's constraints and delivers housing for the Borough.

The intention with this representation on the Draft Local Plan is to recognise Caversham Park (north of the Grade II Listed Caversham House and well away from any of the views towards the limited remaining parts of the landscaped garden laid out by Capability Brown) as a site suitable for delivery of new homes 'over and beyond the conversion of the main house and limited new build on previously developed land'.

This submission also recognises that Policy needs to be realistic around protection of the historic significance of the site given that the main house has been substantively altered over the years of occupation by the BBC.

The grounds, in the condition that they are in; including the remnants of the garden laid out by Capability Brown are poorly configured, poorly documented (with no records available for the original layout designed for an earlier house that no longer exists) are hard to read and understand; particularly in respect of the land to the north of the current main house, where new housing could be developed.

The sections of the historic park and garden which retain the most historic value are south of the main house. If the Policy needs to restrict and or prevent additional development over and above the conversion of the main house, this should specifically relate to sections of the grounds south of the main house.

## SUGGESTED WORDING FOR POLICY CA2: CAVERSHAM PARK

Our suggested wording for the policy is as tracked below:

*“Caversham Park and Caversham Park House are key features of the heritage and landscape of Reading. Caversham Park is a Registered Historic Park and Garden, and the site contains a number of listed features. ~~These assets will be conserved.~~ The significance and setting of all heritage assets on the site needs to be assessed to conserve the site in a manner appropriate to its significance.*

*Conversion of the house from offices to residential, **Hotel, Retirement Accommodation or other suitable use compatible with its heritage** ~~and/or a cultural, community or heritage use~~ will be acceptable if it sustains the significance of the listed building. ~~It is estimated that up to 40-45 dwellings could be accommodated but~~ **The exact** figure will **however** be dependent on more detailed historic assessment of the building and the precise mix of uses.*

*Any development or conversion proposals should open as much of the park as possible to public access, ~~including reinstatement of historic public footpaths.~~*

*~~This policy does not allocate the site for~~ **Any** additional development over and above conversion of the house **will need to be designed in a layout, type and form that is sensitive towards the settings of the Listed Buildings on the site and to the remnants of the historic Park and Garden.** ~~There may be scope for some limited development on previously developed land within the site, which will need to be justified at application stage.~~ Such development must comply with the criteria below:*

- *No development will **cause substantial** harm to the historic interest or the important landscape value of the site.*
- *Development will not detrimentally affect **significant** ~~protected~~ trees or areas of biodiversity importance.*

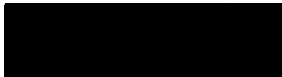
## CONCLUSION

Based upon the due diligence work undertaken, which included a detailed review of the relevant (adopted) planning policies and formal pre-application consultations with Reading Borough Council, it is our view that Policy CA2: Caversham Park is currently unsound in its wording and in how it could be applied if adopted.

We have set out above our suggested re-wording to the Policy, which still respects the importance of the heritage value of the site, as well as the protected trees and biodiversity on the site.

The proposed wording does however recognise the Council's duty to cooperate and to prepare the Local Plan positively (based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so); for the Plan to be deliverable over its plan period and for it to be consistent with the NPPF (the fundamental theme of which is 'the presumption in favour of sustainable development').

Yours sincerely,



**Thaddaeus Jackson-Browne MRTPI**

Associate Director

Direct Line: 0207 198 2096

Email: [tjackson-browne@lsh.co.uk](mailto:tjackson-browne@lsh.co.uk)



**Reading Borough Council – Pre-Submission Draft Local Plan**  
*Under Regulation 19 of the Town and Country Planning (Local Planning)*  
*(England) Regulations 2012*

**November 2017**

**Guidance on Making Representations**  
*(Statement of Representations Procedure)*

*Consultation Details*

Reading Borough Council is consulting on a Pre-Submission Draft Local Plan together with a Proposals Map and accompanying Sustainability Appraisal, between 30<sup>th</sup> November 2017 and 26<sup>th</sup> January 2018. The Local Plan sets out proposed planning policies in Reading up to 2036.

The Local Plan, together with the Proposals Map and other supporting documents, are available to view on the website ([www.reading.gov.uk/newlocalplan](http://www.reading.gov.uk/newlocalplan)). The Local Plan is also available in the reception of the Reading Civic Offices, Bridge Street, RG1 2LU, between 9am and 5pm Mondays to Fridays, and in all Reading Borough Council libraries during normal library opening hours.

Representations should be made in writing, either by e-mail or post. Please e-mail responses to:

[planningpolicy@reading.gov.uk](mailto:planningpolicy@reading.gov.uk)

Or send responses to:

Planning Policy  
Reading Borough Council  
Civic Offices  
Bridge Street  
Reading  
RG1 2LU

We will not be able to accept representations made after Friday 26<sup>th</sup> January 2018.

*Guidance on making representations*

Since this is intended to be the final draft of the document before it is submitted to the Secretary of State, there are some important differences in making representations to previous stages.

Firstly, you should be aware that representations made at this stage will feed directly into the public examination on the Local Plan, which is expected to take place during Spring/Summer 2018. Representations at this stage will be provided to the independent Inspector appointed to examine the plan as evidence, and will therefore need to be published on the Council's website. Personal details such as postal and e-mail addresses, telephone numbers and signatures will be removed before publication, but contact details will need to be provided to the Inspector so that your representation can be considered.

Secondly, the examination will be to find out whether the Local Plan is sound, legally compliant and fulfils the duty to co-operate. Therefore, your

representation will need to address whether you think the Local Plan passes or fails these tests. More details on these tests are below:

- **Legal compliance:** The Plan should have been prepared in line with all relevant legislation.
- **Soundness:** In order to be sound, a plan must be:
  - Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
  - Justified - the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
  - Effective - the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
  - Consistent with national policy - the plan should enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.
- **Duty to co-operate:** This is a legal duty on local authorities to co-operate with other local authorities and a number of other bodies in preparing plans. More detail on the duty to co-operate is available at <https://www.gov.uk/guidance/duty-to-cooperate>

The Council has provided a form for making representations (see overleaf), which will ensure that the relevant matters are addressed. However, our past experience has been that such forms are not particularly well-used. We will therefore still accept representations made in writing by e-mail or post without using the form, as for other consultations. However, we do ask that your representations set out the following information for each part of the plan that you wish to comment on:

- The part of the document to which your response relates (paragraph, policy or section);
- Whether you consider that the plan, or part of the plan, is legally compliant, sound and complies with the duty to co-operate, and why;
- What modification you think is necessary to make the plan, or part of the plan, legally compliant and/or sound<sup>1</sup>;
- Whether you wish to appear in person at the public examination; and
- Whether you wish to be kept informed of the progress of the plan.

More information on the process of public examinations into Local Plans is available by following the link below:

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/531005/Procedural\\_Practice\\_in\\_the\\_Examination\\_of\\_Local\\_Plans\\_-\\_final.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/531005/Procedural_Practice_in_the_Examination_of_Local_Plans_-_final.pdf)

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<sup>1</sup> As the duty to co-operate is intrinsic to how a plan is prepared, there are no modifications which can be made to address a failure to comply with it.

Please return by Friday 26<sup>th</sup> January 2018 to: Planning Policy, Civic Offices,  
 Bridge Street, Reading, RG1 2LU or email [planningpolicy@reading.gov.uk](mailto:planningpolicy@reading.gov.uk)

**PART A - YOUR DETAILS**

	Personal Details	Agent's Details <i>(if applicable)</i>
Title		Mr
First Name		Thaddaeus
Last Name		Jackson-Browne
Job Title <i>(if applicable)</i>		Associate Director
Organisation <i>(if applicable)</i>		Lambert Smith Hampton
Address 1		United Kingdom House
Address 2		180 Oxford Street
Address 3		
Town		London
Post Code		W1D 1NN
Telephone		020 7198 2096
E-mail		<a href="mailto:Tjackson-browne@lsh.co.uk">Tjackson-browne@lsh.co.uk</a>

**PART B - YOUR REPRESENTATION** (please use a separate form for each representation)

**B1. To which part of the Local Plan does this representation relate?**

Policy CA2: Caversham Park
----------------------------

**B2. Do you consider that the Local Plan:** (please tick as appropriate)

Is legally compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Is sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Fulfils the duty to co-operate?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

**B3. Please provide details of why you think the Local Plan, or part of the plan, is or is not legally compliant, sound and/or complies with the duty to co-operate.**

Details are set out within the supporting Cover Letter submitted with this form.
--

*Please continue on another sheet if necessary*

**B4. Please set out the modifications that you think would make the Local Plan, or part of the plan, legally compliant and/or sound. Please provide specific wording where possible.**

Details are set out within the supporting Cover Letter submitted with this form.

*Please continue on another sheet if necessary*

**B5. If you are seeking a modification to the plan, do you wish to appear in person at the public examination?**

Yes  No

**B6. If you wish to appear in person, please briefly outline why you consider this necessary.**

Ready and willing to appear in person should the appointed Inspector wish to address the wording of Policy CA2: Caversham Park in detail or to discuss this representation.

**B7. Do you wish to be kept informed of planning policy matters?**  
(please tick as appropriate)

Please keep me informed of the progress of this Local Plan:

Please keep me informed of all planning policy matters:

BEDFORD, CHRIS

---

**From:** Chris Bedford  
**Sent:** 26 January 2018 15:49  
**To:** Planning Policy  
**Subject:** PLAN REPRESENTATIONS

**This is an EXTERNAL EMAIL. STOP. THINK before you CLICK links or OPEN attachments.**

Sent from Windows Mail

[planningpolicy@reading.gov.uk](mailto:planningpolicy@reading.gov.uk)

#### REPRESENTATIONS ON DRAFT READING PLAN

Unable to read the guidance or form, I am making two representations in writing, as I believe is allowed by the Regulations.

(1)

#### PROPOSED CHANGE

In 4.2.6, after 'water' in line 7, add: 'The town also became an important stop for coaches on the Bath Road, and numerous fashionable houses mainly fronted in stone or render were built on roads east or west of the old centre'.

#### REASON

The existing wording does not adequately bring out the physical change arising from the greater prosperity cited, which gave rise to some of Reading's most significant and obvious surviving heritage. Fast coach travel was also significant for Reading.

(2)

#### PROPOSED CHANGE

In 4.19, line 6, after 'run-off', add 'and directly from watercourses'. Delete 'and' and change 'while' to 'While'.

#### REASON

Surface water flooding arises when run-off rate exceeds drainage capacity, and often occurs well away from watercourses. River ( 'fluvial') flooding arises from rising river levels. The existing wording 'As such ...' confusingly reads as implying a direct link with the watercourses listed just before. The end of the para does make the distinction, so the proposed change would make the para internally consistent.

Chris Bedford

Click [here](#) to report this email as spam.



BEE, KEVIN

Please return by Friday 26<sup>th</sup> January 2018 to: Planning Policy, Civic Offices,  
Bridge Street, Reading, RG1 2LU or email [planningpolicy@reading.gov.uk](mailto:planningpolicy@reading.gov.uk)

**PART A - YOUR DETAILS**

	Personal Details	Agent's Details <i>(if applicable)</i>
Title	Mr	
First Name	Kevin	
Last Name	Bee	
Job Title <i>(if applicable)</i>		
Organisation <i>(if applicable)</i>		
Address 1		
Address 2		
Address 3		
Town		
Post Code		
Telephone		
E-mail		

**PART B - YOUR REPRESENTATION** (please use a separate form for each representation)

**B1. To which part of the Local Plan does this representation relate?**

CA1 - SITES FOR DEVELOPMENT IN CAVERSHAM AND EMMER GREEN  
CA1b – Parts of Reading Golf Club

**B2. Do you consider that the Local Plan:** (please tick as appropriate)

Is legally compliant?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Is sound?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
Fulfils the duty to co-operate?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

**B3. Please provide details of why you think the Local Plan, or part of the plan, is or is not legally compliant, sound and/or complies with the duty to co-operate.**

The plan has not appropriately articulated why there is a need for more houses in the Emmer Green area. Especially in the context of a flat housing market and barely growing economy.

The plan provides no solution to the issues with which it raises, i.e. :

- Take measures to mitigate impacts on the highway network, particularly on Kidmore End Road;
- Take account of potential archaeological significance; and
- Take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water, and make provision for upgrades where required

In particular, the solution to the impact on Kidmore End Road, which in part is only wide enough to allow one car through at a time.

Emmer Green Primary School would also be put under extra pressure to provide a safe environment for its pupils whilst using Grove Road to access the school.

There is no evidence that the duty to co-operate has been fulfilled.

Another concern is the impact to the environment. Reading Golf Club is a very beautiful course and has many very old trees and hedgerows it helps to preserve.

What the plan does not seem to consider is the impact of having 130 extra houses on schools and other local services such as healthcare. The area is very attractive to families and the local schools are already oversubscribed. This will be particularly hard for the secondary school provision with a single school, Highdown, having to take all the extra pupils.

*Please continue on another sheet if necessary*

**B4. Please set out the modifications that you think would make the Local Plan, or part of the plan, legally compliant and/or sound. Please provide specific wording where possible.**

A plan for the roads surrounding its development to ensure a safe environment for pedestrians and road users.

A plan for increasing the provision of places at local schools.

A plan for increasing local healthcare provision such as GPs and dentists.

A plan for safeguarding the local environment.

A statement ensuring the protection of the Grove Road recreational area in Emmer Green

Evidence that the duty to co-operate has been fulfilled.

*Please continue on another sheet if necessary*

**B5. If you are seeking a modification to the plan, do you wish to appear in person at the public examination?**

Yes

No

**B6. If you wish to appear in person, please briefly outline why you consider this necessary.**

**B7. Do you wish to be kept informed of planning policy matters?**

(please tick as appropriate)

Please keep me informed of the progress of this Local Plan:

Please keep me informed of all planning policy matters:

BELL TOWER COMMUNITY ASSOCIATION

Planning Policy Team

Civic Offices  
Bridge Street  
Reading  
RG1 2LU

**Re: Gypsy and traveller provision in pre-submission local plan**

The Bell Tower Community Association would like to make the following comments on the plan for a potential traveller transit site at Cow Lane (WR4):

In its vision statement in 2.1.5. the council says it sees Reading as “a City of Rivers and Parks” with the example of the Thames between the Caversham and Reading Bridges. However, moving West from the Caversham Bridge the presence of a travellers site might deter residents from using the Thames Path. This might also impinge upon the priority in 2.1.7 of keeping the town green, safe and active and the core strategy outlined in 2.1.8 which says: “Green areas throughout the town, including its watercourses, woodlands and open green space, will be protected, enhanced and linked together as a recreational and ecological resource.”

The location of WR4 on a flood plain also calls the site into question under this provision of CC3 that where possible developments should incorporate mitigation and resilience measures for any increases in river flooding levels as a result of climate change. This is particularly relevant given central government guidelines on travellers sites and flood plains in the light of caravans' vulnerability to flooding. The impact on the use of the site as a travellers camp on the flood risk would also need to be assessed under policy 4.2.98.

The rise in reported in the surrounding area when travellers unofficially set up a camp on WR4 in November 2017 means the development risks breaching the policy on safeguarding amenity in CC8 which states development should not have a detrimental impact on crime and safety, something which is re-iterated in WR4. In November 2017, when the travellers were there, 39 crimes were reported in the area around Richfield Avenue, according to the Thames Valley Police website <https://www.police.uk/thames-valley/N464/crime/2017-11/>. That compares with seven in both October 2017 and November 2016.

The site is also likely to cause detriment to outlook which would contravene the provisions of CC8 too. Using WR4 would also run counter to policy EN5 on protecting significant views (1 & 3) as shown by figure 4.2 and be in contravention of H13 iv.

The use of WR4 for a travellers' site also runs counter to most of the provisions in policy EN11 on waterspaces.

Proximity to the Thames would also mean the council would have to ensure the site did not have a detrimental effect under EN16 and under 4.2.91 on the provision of appropriate sewerage outlets.

WR4 is also close to core employment area EM2g. The location of a travellers' site nearby is likely to deter businesses from using parts or all of it, effectively meaning that employment land would be lost in contravention of policy EM3.

The policy on WR4 also states that a travellers' site there should not cause adverse effects on the local area in terms of public amenity and safety, which has been called into question when travellers occupied the site illegally. Also the policy on WR4 states that it should not have significant adverse effects on existing operations, in particular the Reading Festival, which – given the perceptions surrounding travellers' sites – seems unlikely. Any detrimental effect on the festival would run contrary to the core strategy outlined in 2.1.8. of Reading's role as a centre for arts and culture expanding.

Yours sincerely,

Jonathan Dart, chairman, Bell Tower Community Association

BERKSHIRE, BUCKINGHAMSHIRE AND OXFORDSHIRE WILDLIFE TRUST



Please return by Friday 26<sup>th</sup> January 2018 to: Planning Policy, Civic Offices,  
 Bridge Street, Reading, RG1 2LU or email [planningpolicy@reading.gov.uk](mailto:planningpolicy@reading.gov.uk)

**PART A - YOUR DETAILS**

	Personal Details	Agent's Details <i>(if applicable)</i>
Title	Dr	
First Name	Sam	
Last Name	Cartwright	
Job Title <i>(if applicable)</i>	Senior Biodiversity and Planning Officer	
Organisation <i>(if applicable)</i>	Berks, Bucks and Oxon Wildlife Trust (BBOWT)	
Address 1	Hasker House, Woolley Firs	
Address 2	Cherry Garden Lane	
Address 3		
Town	Maidenhead	
Post Code	SL63LJ	
Telephone	01628 829574	
E-mail	samcartwright@bbowt.org.uk	

**PART B - YOUR REPRESENTATION** (please use a separate form for each representation)

**B1. To which part of the Local Plan does this representation relate?**

Main policies document; policies EN12, EN14, EN18, TR2, Reading Infrastructure Delivery Plan

**B2. Do you consider that the Local Plan:** (please tick as appropriate)

Is legally compliant?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Is sound?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
Fulfils the duty to co-operate?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

**B3. Please provide details of why you think the Local Plan, or part of the plan, is or is not legally compliant, sound and/or complies with the duty to co-operate.**

Please see our comments in the attached letter.

*Please continue on another sheet if necessary*

**B4. Please set out the modifications that you think would make the Local Plan, or part of the plan, legally compliant and/or sound. Please provide specific wording where possible.**

Please see our comments in the attached letter.

*Please continue on another sheet if necessary*

**B5. If you are seeking a modification to the plan, do you wish to appear in person at the public examination?**

Yes  No

**B6. If you wish to appear in person, please briefly outline why you consider this necessary.**

Please see our comments in the attached letter.

**B7. Do you wish to be kept informed of planning policy matters?**  
(please tick as appropriate)

Please keep me informed of the progress of this Local Plan:

Please keep me informed of all planning policy matters:

Hasker House, Woolley Firs  
Cherry Garden Lane  
Maidenhead, Berks SL6 3LJ  
samcartwright@bbowt.org.uk  
[www.bbowt.org.uk](http://www.bbowt.org.uk)

26<sup>th</sup> January 2018

Planning Policy  
Reading Borough Council  
planningpolicy@reading.gov.uk

**By email only**

Dear Sir / Madam,

**Submission Version Reading Borough Local Plan 2036 (Regulation 19) Consultation**

Thank you for consulting the Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust (BBOWT) on the above consultation. As a wildlife conservation charity, our comments relate specifically to the protection and enhancement of biodiversity. We have therefore not reviewed the plan and associated documents fully, and are only providing comment on elements that are particularly applicable to nature conservation. Please note that lack of BBOWT comment on any part of the draft Local Plan does not indicate our endorsement.

**Policy EN12 – Biodiversity and the Green Network**

We are broadly supportive of this policy, including additional text that has been added since the Regulation 18 consultation. However, we consider that the use of the caveats “*where possible*” and “*where practicable*” in relation to enhancing biodiversity interest features and integrating them into development proposals respectively, significantly weakens the policy and limits the ability of the Council to request enhancement, and integration of, existing biodiversity assets into the design of new development, particularly where this is located on green field sites.

If these terms are to be retained in the policy, we suggest they are amended slightly, using the terms “***wherever possible***” and “***wherever practicable***” to emphasize the expectation that enhancements to existing features must be delivered unless there are exceptional reasons why this is not possible to achieve. This will make the policy consistent the following NPPF principles;

- Paragraph 7 - “...the need for the planning system to perform a number of roles: ... • an environmental role – contributing to protecting and enhancing our natural ... environment, and, as part of this, helping to improve biodiversity”, and;
- Paragraph 9 - “Pursuing sustainable development involves seeking positive improvements in the quality of the ...natural...environment...”, and;

- Paragraph 109 - “*The planning system should contribute to and enhance the natural and local environment...*”, and;
- Paragraph 118 (point 4) - “*...local planning authorities should aim to conserve and enhance biodiversity by applying the following principles: ... • opportunities to incorporate biodiversity in and around developments should be encouraged;*”(our underlining added for emphasis).

Whilst this is a late stage in the Local Plan development process, we also consider that this policy and its supporting paragraphs lack sufficient detail on the biodiversity information required to support planning proposals and the steps that should be taken by applicants to incorporate biodiversity into built development effectively, as intended by the NPPF. **We therefore consider that the Local Plan would be well served by a supporting Biodiversity SPD** and we direct the Council to the following good examples of draft submission Local Plan Policy and adopted SPDs relating to biodiversity to demonstrate good examples prepared by other local authorities;

- Lichfield adopted Biodiversity and Development SPD 2016 - <https://www.lichfielddc.gov.uk/Council/Planning/The-local-plan-and-planning-policy/Supplementary-planning-documents/Downloads/Biodiversity-Development/Biodiversity-and-Development-SPD.pdf>
- Aylesbury Value District Council draft submission Local Plan Policy NE2 (Biodiversity and Geodiversity) - [https://www.aylesburyvaledc.gov.uk/sites/default/files/page\\_downloads/Submission-VALP-%20high-res2.pdf](https://www.aylesburyvaledc.gov.uk/sites/default/files/page_downloads/Submission-VALP-%20high-res2.pdf)

## Comments on supporting text for Policy EN12

**4.2.56** – The following text is incorrect; “• *Biodiversity Opportunity Areas: these are those LNRs identified by the Berkshire Nature Conservation Forum....*”. Biodiversity Opportunity Areas are not LNRs. They are focus areas identifying where resources for nature conservation can be most efficiently targeted. We propose the text should more correctly read “• ***Biodiversity Opportunity Areas: these are focus areas identified by the Berkshire Nature Conservation Forum....***”.

**4.2.62** – We are broadly supportive of this paragraph and the additional text since the Regulation 18 consultation, however we consider the inclusion of the word “significant” is misleading and should be removed, as in: “***Proposals should....enhance the quality and integrity of sites (where appropriate), by maximising the inclusion of ~~significant~~ biodiversity and nature conservation features....***”. This is because many biodiversity features of significant *value* to nature conservation are not significant *features* as such. For example, simply ensuring that areas of bramble and scrub thickets are retained in public green space areas on housing developments would not be interpreted as significant features *per se*, but are highly valuable as habitat for declining species such as hedgehogs.

## Policy EN14 – Trees, Hedges and Woodlands

BBOWT is generally supportive of this policy; however we note that it contains no reference to ancient woodland or veteran trees, which are irreplaceable habitats. Paragraph 4.2.67 does mention the presence of two ancient woodlands within the Borough, but there is no reference to these being irreplaceable habitats, (which receive specific mention within the NPPF and require special consideration of development impacts, such as the provision of semi-natural habitat buffers). Nor is there any mention of veteran trees, of which there are a number currently recorded in the Borough

(see here <http://www.ancient-tree-hunt.org.uk/discoveries/interactivemap>), and which also require special consideration in the planning process.

We propose the text of policy EN14 is amended to include the following text;

***“Ancient woodlands and veteran trees are irreplaceable and will be protected. Proposals likely to cause harm to ancient woodland or veteran trees will be refused. Developers will be required to provide habitat buffers around areas of ancient woodland or veteran trees to and should provide additional planting where appropriate to do so”.***

This will make the policy consistent with the NPPF paragraph 118 (point 5); *“• planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland, and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss;”*.

We also propose the minor amendment to the text of policy EN14 from *“The quality of waterside vegetation will be maintained or enhanced.”* to ***“The quality of waterside vegetation will be maintained and enhanced.”*** as it is not practically possible, or indeed desired, to enhance the quality of vegetation that is not also being adequately maintained.

#### **Comments on supporting text for Policy EN14**

**4.2.67** – This paragraph refers to ancient woodlands within the Borough, but does not also state that they are deemed irreplaceable habitats, as defined by the NPPF (paragraph 118). This text also fails to mention the numerous veteran trees in Reading, which should also receive the same planning consideration. To be consistent with the NPPF, we recommend that the following sentence be included; ***“Ancient woodlands and veteran and ancient trees are irreplaceable. Permission is likely to be refused for development that would lead to the loss or harm of ancient woodland or veteran and ancient trees. There are two ancient woodlands in Reading and many veteran and ancient trees.”***

**4.2.68** – We recommend the addition of the following minor amendment to reflect good ecological practice; *“There will be a need to use appropriate large canopy species that are adaptable to future predicted climate conditions (native species of local genetic provenance if possible and where appropriate in order to deliver biodiversity benefits)”*. This addition reflects good practice in terms of minimising the risk of introducing disease and pests to the area from imported specimens, and maximising the biodiversity enhancement potential of the planting carried out.

#### **Policy EN18 – Flooding and Sustainable Drainage Systems**

BBOWT is supportive of this policy, particularly with regard to the emphasis on requiring sustainable drainage systems that maximise ecological benefits.

## **Policy TR2 – Major Transport Projects**

BBOWT holds no in-principle objection to a transport policy what identifies major strategic transport projects. However, this policy includes a reference to safeguarded land for the eastern Mass Rapid Transit route (TR2a), which is land also identified elsewhere within this Submission Local Plan as a local green space (policy EN7Cd), major landscape feature (policy EN13), is in part a designated Local Wildlife Site (policy EN12), is considered to contain priority habitat and acts as an existing green corridor (protected under policy EN12 and Reading Biodiversity Action Plan), and will have significant unmitigated impacts on the Thames River corridor (protected under policy EN11). The full detail of BBOWT’s objection to this site is contained with our (so far) two detailed representations to the Council on submitted planning application 171108, so we do not replicate those points here. **However, we wish to register an objection to the safeguarding of this area of land for the purpose of an eastern Mass Rapid Transit route within our response here.**

In relation to the proposed crossing of the River Thames (policy TR2), BBOWT holds no in-principle objection, but considers that any proposal for such a scheme should be of an exemplary standard in terms of biodiversity impact avoidance, mitigation and, as needed, compensation, aiming to bring about a significant uplift in biodiversity as a result of the proposal (e.g. 20%, or greater, as defined in Lichfield’s adopted Biodiversity and Development SPD 2016) as well as exemplar standards of species-specific mitigation that may be required.

## **Reading Infrastructure Delivery Plan (November 2017)**

This document includes an Open Space and a Biodiversity strategy. BBOWT considers that whilst these strategies are a start, they contain inadequate detail to guide developers on how to deliver proposals that fulfil Local Policy requirements as intended. For this, a much more detailed delivery plan is needed, and we direct the Council to examples from other local authorities that we consider to be good practice examples. For example, see Lichfield’s adopted Biodiversity and Development SPD 2016.

-----

Thank you for the opportunity for BBOWT to comment on the Submission Draft Local Plan. Please do not hesitate to contact me if you require any further information or clarification of these comments.

Yours sincerely,

Sam Cartwright, PhD  
Senior Biodiversity and Planning Officer (Berkshire)  
Berkshire, Buckinghamshire & Oxfordshire Wildlife Trust

## BERKSHIRE GARDENS TRUST



Please return by Friday 26<sup>th</sup> January 2018 to: Planning Policy, Civic Offices,  
 Bridge Street, Reading, RG1 2LU or email [planningpolicy@reading.gov.uk](mailto:planningpolicy@reading.gov.uk)

**PART A - YOUR DETAILS**

	Personal Details	Agent's Details <i>(if applicable)</i>
Title	Miss	
First Name	Fiona	
Last Name	Hope	
Job Title <i>(if applicable)</i>	Executive Secretary	
Organisation <i>(if applicable)</i>	Berkshire Gardens Trust	
Address 1		
Address 2		
Address 3		
Town		
Post Code		
Telephone		
E-mail		

**PART B - YOUR REPRESENTATION** (please use a separate form for each representation)

**B1. To which part of the Local Plan does this representation relate?**

Section 4.2: General Policies for Built and Natural Environment  
(EN1, EN3, EN4, EN5, EN6, EN8, EN11).

**B2. Do you consider that the Local Plan:** (please tick as appropriate)

Is legally compliant?

Yes

No

Is sound?

Yes

No

 N

Fulfils the duty to co-operate?

Yes

No

**B3. Please provide details of why you think the Local Plan, or part of the plan, is or is not legally compliant, sound and/or complies with the duty to co-operate.**

Our concerns relate to the absence of comprehensive and explicit references to historic designed landscapes with either a national designation status or local value, which are afforded protection by the National Policy Planning Framework.

**Section 4.2: General Policies for Built and Natural Environment  
(EN1, EN3, EN4, EN5, EN6, EN8, EN11)**

While EN1 (Protection and Enhancement of the Historic Environment) and EN3 (Enhancement of Conservation Areas) look very positive and helpful, we have concerns about the others, which do not seem to refer explicitly to the parks, gardens and historic designed landscapes of historic buildings.

Our suggestions are in B4 below.

*Please continue on another sheet if necessary*

**B4. Please set out the modifications that you think would make the Local Plan, or part of the plan, legally compliant and/or sound. Please provide specific wording where possible.**

These modifications address the absence of comprehensive and explicit references to historic designed landscapes with either a national designation status or local value, which are afforded protection by the National Policy Planning Framework.

**Section 4.2: General Policies for Built and Natural Environment**

**EN4, Locally Important Heritage Assets and Appendix 2** - The criteria for local listing only includes buildings and structures and should be expanded to include small parks, gardens and grounds of some historic buildings, both here and in other parts of the Development Plan where appropriate.

**EN5 Protection of Significant Views with Heritage Interest, Figure 4.2 and Paragraph 4.2.22** - There should be an explicit reference to the fact that this figure shows public views to heritage assets and also to the fact that there will be important views from private land as well as the assets themselves which should be protected and if possible enhanced.

**EN6, New Development in a Historic Context** - This should be amended to refer to 'respecting' historic landscape as well as architectural and visual features.

**EN8, Undesignated Open Space and Paragraph 4.2.30** - The spaces referred to in this policy may also have an historic value, which should be reflected in the text alongside the reference to recreational and amenity resources.

**EN11, Waterspaces** - The first paragraph of this policy should contain a reference to the 'historical value' of these spaces, which often relate to much earlier designed landscapes associated with (for example) old private estates.

*Please continue on another sheet if necessary*

**B5. If you are seeking a modification to the plan, do you wish to appear in person at the public examination?**

Yes

No  N

**B6. If you wish to appear in person, please briefly outline why you consider this necessary.**

---

**B7. Do you wish to be kept informed of planning policy matters?**

(please tick as appropriate)

Please keep me informed of the progress of this Local Plan:

Please keep me informed of all planning policy matters:

Please return by Friday 26<sup>th</sup> January 2018 to: Planning Policy, Civic Offices,  
 Bridge Street, Reading, RG1 2LU or email [planningpolicy@reading.gov.uk](mailto:planningpolicy@reading.gov.uk)

**PART A - YOUR DETAILS**

	Personal Details	Agent's Details <i>(if applicable)</i>
Title	Miss	
First Name	Fiona	
Last Name	Hope	
Job Title <i>(if applicable)</i>	Executive Secretary	
Organisation <i>(if applicable)</i>	Berkshire Gardens Trust	
Address 1		
Address 2		
Address 3		
Town		
Post Code		
Telephone		
E-mail		

**PART B - YOUR REPRESENTATION** (please use a separate form for each representation)

**B1. To which part of the Local Plan does this representation relate?**

Section 5, Central Reading:  
Figure 5.1, Figure 5.3 and Figure 5.5, Policies CR3, CR13a and CR15.

**B2. Do you consider that the Local Plan:** (please tick as appropriate)

Is legally compliant?

Yes

No

Is sound?

Yes

No

 N

Fulfils the duty to co-operate?

Yes

No

**B3. Please provide details of why you think the Local Plan, or part of the plan, is or is not legally compliant, sound and/or complies with the duty to co-operate.**

Section 5, Central Reading:

-Figure 5.1 (Central Area Strategy), Figure 5.3 (Station/River Area Strategy) and Figure 5.5 (East Side Major Opportunity Strategy)

-Policies CR3 (Public Realm), CR13a (Reading Prison) and CR15 (Abbey Quarter)

We appreciate that the Figures listed cover different areas of Reading. However, we suggest that the document would be clearer and more robust if there were closer correlation between them.

Currently, there is no explicit reference to the registered status of the Forbury Gardens designed landscape, nor to the visual link between them and the surrounding 'borrowed' landscape.

Also, despite the overlap between Figures 5.3 and 5.5, the former appears to limit the sensitive historic areas to only part of the Forbury Gardens and exclude the Abbey gardens and historic buildings, waterways and routes in this area which contribute to its status.

Our suggestions are in B4 below.

*Please continue on another sheet if necessary*

**B4. Please set out the modifications that you think would make the Local Plan, or part of the plan, legally compliant and/or sound. Please provide specific wording where possible.**

These modifications address the absence of comprehensive and explicit references to historic designed landscapes with either a national designation status or local value, which are afforded protection by the National Policy Planning Framework.

**Section 5, Central Reading:**

**-Figure 5.1 (Central Area Strategy), Figure 5.3 (Station/River Area Strategy) and Figure 5.5 (East Side Major Opportunity Strategy)**

**-Policies CR3 (Public Realm), CR13a (Reading Prison) and CR15 (Abbey Quarter)**

These parts of the Local Plan should contain explicit references to the registered status of the Forbury Gardens designed landscape, the visual link between the historic features and landscapes and the surrounding 'borrowed' landscape in these interrelated parts of Reading.

It should be explicit that Figures 5.3 and 5.5 both cover the sensitive historic designed landscapes of the Forbury Gardens, the Abbey gardens and historic buildings, waterways and routes contributing to the historic value of this area.

*Please continue on another sheet if necessary*

**B5. If you are seeking a modification to the plan, do you wish to appear in person at the public examination?**

Yes

No

**N**

**B6. If you wish to appear in person, please briefly outline why you consider this necessary.**

---

**B7. Do you wish to be kept informed of planning policy matters?**

(please tick as appropriate)

Please keep me informed of the progress of this Local Plan:

**Y**

Please keep me informed of all planning policy matters:

**Y**

Please return by Friday 26<sup>th</sup> January 2018 to: Planning Policy, Civic Offices,  
 Bridge Street, Reading, RG1 2LU or email [planningpolicy@reading.gov.uk](mailto:planningpolicy@reading.gov.uk)

**PART A - YOUR DETAILS**

	Personal Details	Agent's Details <i>(if applicable)</i>
Title	Miss	
First Name	Fiona	
Last Name	Hope	
Job Title <i>(if applicable)</i>	Executive Secretary	
Organisation <i>(if applicable)</i>	Berkshire Gardens Trust	
Address 1		
Address 2		
Address 3		
Town		
Post Code		
Telephone		
E-mail		



**PART B - YOUR REPRESENTATION** (please use a separate form for each representation)

**B1. To which part of the Local Plan does this representation relate?**

Section 8: Caversham and Emmer Green, Policy CA2.
---

**B2. Do you consider that the Local Plan:** (please tick as appropriate)

Is legally compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Is sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> N
Fulfils the duty to co-operate?	Yes <input type="checkbox"/>	No <input type="checkbox"/>

**B3. Please provide details of why you think the Local Plan, or part of the plan, is or is not legally compliant, sound and/or complies with the duty to co-operate.**

---

Our concerns relate to the absence of comprehensive and explicit references to historic designed landscapes with either a national designation status or local value, which are afforded protection by the National Policy Planning Framework.

**Section 8: Caversham and Emmer Green, Policy CA2**

The registered status of the designed garden landscape at Caversham Court is not referenced in the main text (8.1.5).

It is also not clear whether or not all of this site is within the “historic cluster” radiating out from central Caversham (Fig 8.1). This contrasts with a specific reference to the “listed manor house” (8.1.5) and to Caversham Park as a registered Historic Park and Garden (CA2 and Fig 8.1).

---

*Please continue on another sheet if necessary*

**B4. Please set out the modifications that you think would make the Local Plan, or part of the plan, legally compliant and/or sound. Please provide specific wording where possible.**

**Section 8: Caversham and Emmer Green, Policy CA2**

The registered status of the designed garden landscape at Caversham Court should be referenced in the Paragraph 8.1.5 and explicitly covered by Figure 8.1.

*Please continue on another sheet if necessary*

**B5. If you are seeking a modification to the plan, do you wish to appear in person at the public examination?**

Yes  No

**B6. If you wish to appear in person, please briefly outline why you consider this necessary.**

**B7. Do you wish to be kept informed of planning policy matters?**  
(please tick as appropriate)

Please keep me informed of the progress of this Local Plan:

Please keep me informed of all planning policy matters:

Please return by Friday 26<sup>th</sup> January 2018 to: Planning Policy, Civic Offices,  
Bridge Street, Reading, RG1 2LU or email [planningpolicy@reading.gov.uk](mailto:planningpolicy@reading.gov.uk)

**PART A - YOUR DETAILS**

	Personal Details	Agent's Details <i>(if applicable)</i>
Title	Miss	
First Name	Fiona	
Last Name	Hope	
Job Title <i>(if applicable)</i>	Executive Secretary	
Organisation <i>(if applicable)</i>	Berkshire Gardens Trust	
Address 1		
Address 2		
Address 3		
Town		
Post Code		
Telephone		
E-mail		

**PART B - YOUR REPRESENTATION** (please use a separate form for each representation)

**B1. To which part of the Local Plan does this representation relate?**

Section 9: East Reading, Policy ER2.

**B2. Do you consider that the Local Plan:** (please tick as appropriate)

Is legally compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Is sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Fulfils the duty to co-operate?	Yes <input type="checkbox"/>	No <input type="checkbox"/>

**B3. Please provide details of why you think the Local Plan, or part of the plan, is or is not legally compliant, sound and/or complies with the duty to co-operate.**

Our concerns relate to the absence of comprehensive and explicit references to historic designed landscapes with either a national designation status or local value, which are afforded protection by the National Policy Planning Framework.

**Section 9: East Reading, Policy ER2 (Whiteknights Campus)**

The historic value and registered status of the Whiteknights Campus designed landscape is not referred to in this section. Although there are references to Reading cemetery being a registered historic garden, Palmer Park as one of the town's main green spaces and also to Georgian, Victorian heritage and conservation areas (9.1.4), these are not explicitly outlined in Figure 9.1.

*Please continue on another sheet if necessary*

**B4. Please set out the modifications that you think would make the Local Plan, or part of the plan, legally compliant and/or sound. Please provide specific wording where possible.**

These modifications address the absence of comprehensive and explicit references to historic designed landscapes with either a national designation status or local value, which are afforded protection by the National Policy Planning Framework.

**Section 9: East Reading, Policy ER2 (Whiteknights Campus)**

The historic value and registered status of the Whiteknights Campus designed landscape should be explicitly referred to in Section 9 and Policy ER2.

Reading cemetery and Palmer Park should be explicitly outlined in Figure 9.1 as well as the clusters of Georgian, Victorian heritage and conservation areas.

*Please continue on another sheet if necessary*

**B5. If you are seeking a modification to the plan, do you wish to appear in person at the public examination?**

Yes

No  N

**B6. If you wish to appear in person, please briefly outline why you consider this necessary.**

---

**B7. Do you wish to be kept informed of planning policy matters?**

(please tick as appropriate)

Please keep me informed of the progress of this Local Plan:

 Y

Please keep me informed of all planning policy matters:

 Y

BICKERSTAFFE, JANE

**Reading Borough Council - Pre-Submission Draft Local Plan**  
*Under Regulation 19 of the Town and Country Planning (Local Planning)*  
*(England) Regulations 2012*

Reading Borough Council  
 Pre-Submission Draft Local Plan  
 November 2017  
 Representations Form



Please return by Friday 26<sup>th</sup> January 2018 to: Planning Policy, Civic Offices,  
 Bridge Street, Reading, RG1 2LU or email [planningpolicy@reading.gov.uk](mailto:planningpolicy@reading.gov.uk)

**PART A - YOUR DETAILS**

	Personal Details	Agent's Details <i>(if applicable)</i>
Title	Mrs	
First Name	Jane	
Last Name	Bickerstaffe	
Job Title <i>(if applicable)</i>		
Organisation <i>(if applicable)</i>		
Address 1		
Address 2		
Address 3		
Town		
Post Code		
Telephone		
E-mail		

**PART B - YOUR REPRESENTATION** (please use a separate form for each representation)

**B1. To which part of the Local Plan does this representation relate?**

EN7 - EN7Nn Mapledurham Playing Fields

**B2. Do you consider that the Local Plan:** (please tick as appropriate)

Is legally compliant?	Yes	<input type="checkbox"/> Don't know	No	<input type="checkbox"/>
Is sound?	Yes	<input type="checkbox"/> Don't know	No	<input type="checkbox"/>
Fulfils the duty to co-operate?	Yes	<input type="checkbox"/> Don't know	No	<input type="checkbox"/>

**B3. Please provide details of why you think the Local Plan, or part of the plan, is or is not legally compliant, sound and/or complies with the duty to co-operate.**

I hope that the Council has appropriate expertise to ensure that the Local Plan is legally compliant, sound and cooperates.

*Please continue on another sheet if necessary*



**B4. Please set out the modifications that you think would make the Local Plan, or part of the plan, legally compliant and/or sound. Please provide specific wording where possible.**

I would like the Plan to specifically state that it will protect all existing Local Green Spaces and Public Open Spaces and ensure there are not used for building houses or schools.

In particular, I would recommend that it annotates the reference to Mapledurham Playing Fields with a note that the land is protected by a Trust to be used solely for sport and leisure purposes and this Trust should never be broken.

*Please continue on another sheet if necessary*

**B5. If you are seeking a modification to the plan, do you wish to appear in person at the public examination?**

Yes

No

**B6. If you wish to appear in person, please briefly outline why you consider this necessary.**

**B7. Do you wish to be kept informed of planning policy matters?**

(please tick as appropriate)

Please keep me informed of the progress of this Local Plan:

Please keep me informed of all planning policy matters:

BINGLEY, PATRICK

---

**From:** Patrick Bingley  
**Sent:** 24 January 2018 21:45  
**To:** Planning Policy  
**Cc:** C Bingley  
**Subject:** Building 130 houses on Reading Golf Course, Kidmore End Road, Emmer Green

**This is an EXTERNAL EMAIL. STOP. THINK before you CLICK links or OPEN attachments.**

Dear Sir or Madam:

I am writing to raise my concerns about this proposed build.

There are not enough school or doctor's places.

You'll already be aware that the road system can't handle the amount of existing car users either.

If new housing must be found, then please convert the multiple new empty office blocks in Reading town centre.

Kind Regards,

Patrick Bingley

Click [here](#) to report this email as spam.

BISHOP, ROB

Please return by Friday 26<sup>th</sup> January 2018 to: Planning Policy, Civic Offices,  
Bridge Street, Reading, RG1 2LU or email [planningpolicy@reading.gov.uk](mailto:planningpolicy@reading.gov.uk)

**PART A - YOUR DETAILS**

	Personal Details	Agent's Details <i>(if applicable)</i>
Title	Mr	
First Name	Rob	
Last Name	Bishop	
Job Title <i>(if applicable)</i>		
Organisation <i>(if applicable)</i>		
Address 1		
Address 2		
Address 3		
Town		
Post Code		
Telephone		
E-mail		

**PART B - YOUR REPRESENTATION** (please use a separate form for each representation)

**B1. To which part of the Local Plan does this representation relate?**

CA1b, Site size: 3.75 ha 90-130 dwellings, community provision including healthcare and replacement clubhouse

**B2. Do you consider that the Local Plan:** (please tick as appropriate)

Is legally compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Is sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Fulfils the duty to co-operate?	Yes <input type="checkbox"/>	No <input type="checkbox"/>

**B3. Please provide details of why you think the Local Plan, or part of the plan, is or is not legally compliant, sound and/or complies with the duty to co-operate.**

I do not believe the Local Plan in respect of site CA1b is sound because:

- The proposed development will create extra road traffic (likely to be circa 200 cars), most of which will exit the proposed development on to Kidmore End Lane to get to the B481 Peppard Road. Kidmore End Lane is effectively a one way road alongside the Emmer Green recreation ground and this extra traffic will only serve to make it a bottleneck. Once on to the B481, most of the extra traffic will be travelling towards Reading town centre, adding to the traffic jam that causes tailbacks to the Esso garage. It also causes many cars to illegally cut through the private road of Grosvenor Road (where I live) causing a jam outside my house as they wait to get on to the Henley Road. I moved to my present address because it was a private road in a quiet area and I pay towards its upkeep. The extra traffic on my road increases my maintenance costs, destroys its quiet nature and subjects me and my neighbours to abuse from the drivers when we try to stop it.
- Without a third Thames bridge, the proposed development will exacerbate the existing traffic problems. No new schemes north of the river should be approved until the bridge is built.
- There is no evidence that the proposed development will provide an upgrade to the existing infrastructure (roads, parking, schools, surgeries, etc.). Until there is clear evidence of actual plans (not just a financial contribution), the infrastructure is at risk that it will never be adequate.
- The proposed development will adversely affect the "green lung" that the present golf course provides to local residents.

- The proposed development puts at risk the ongoing viability of Reading Golf Club, a recreational facility to local residents. It also puts at risk the 100 year history of the Club on this site (a significant heritage in the Reading area).
- There are many important trees on the proposed development site (one is a three hundred year old oak tree), some that are protected by TPOs and many that have recently been planted by Reading Golf Club in conjunction with the Woodland Trust. The proposed development scheme puts all of these at risk.

*Please continue on another sheet if necessary*

**B4. Please set out the modifications that you think would make the Local Plan, or part of the plan, legally compliant and/or sound. Please provide specific wording where possible.**

---

*Please continue on another sheet if necessary*

**B5. If you are seeking a modification to the plan, do you wish to appear in person at the public examination?**

Yes  No

**B6. If you wish to appear in person, please briefly outline why you consider this necessary.**

**B7. Do you wish to be kept informed of planning policy matters?**  
(please tick as appropriate)

Please keep me informed of the progress of this Local Plan:

Please keep me informed of all planning policy matters:



BLADES, VICTORIA

---

**From:** Victoria Blades  
**Sent:** 18 December 2017 17:26  
**To:** Planning Policy  
**Subject:** Consultation on Pre-submission Draft Local Plan

This is an EXTERNAL EMAIL. STOP. THINK before you CLICK links or OPEN attachments.

Hello. With regard to the possible development of the Hamilton Centre Site

ER1: SITES FOR DEVELOPMENT IN EAST READING ER1f HAMILTON CENTRE, BULMERSHE ROAD

If this site was put forward for development, access would need to be addressed at the top of Bulmershe/Hamilton - as currently a nightmare with parking, especially for the safety of the children attending the 3 schools on Crescent Road. Also parking would need to be addressed as currently not enough on street parking. Garden/recreational space would have to be considered carefully, as taking a slice of the school playing field is not an acceptable option. Disagree with this site for inclusion in the plan.

Kind Regards, Victoria Blades

Victoria Blades  
Planning Technician  
Planning, Transport and Countryside  
Environment, Culture & Communities  
Bracknell Forest Council

Tel: 01344 351228  
Email: [Victoria.Blades@bracknell-forest.gov.uk](mailto:Victoria.Blades@bracknell-forest.gov.uk)  
Web: [www.bracknell-forest.gov.uk](http://www.bracknell-forest.gov.uk)

\*\*\*\*\*

This e-mail will be read by employees of the Council and all personal information will be dealt with in accordance with the Data Protection Act 1998. The views expressed in this e-mail are those of the individual and not necessarily the views or opinions of Bracknell Forest Borough Council.

This e-mail and any files transmitted with it are confidential and intended solely for the use of the individual or entity to which they are addressed. If you have received this e-mail in error please notify the system manager. Email: [mail.administrator@bracknell-forest.gov.uk](mailto:mail.administrator@bracknell-forest.gov.uk)

This footnote also confirms that this e-mail has been scanned for the presence of computer viruses. Although the Council has taken steps to ensure that this e-mail and any attachments are virus free we advise that in keeping with good ICT practice the recipients should confirm this for themselves.

\*\*\*\*\*

BOOKER GROUP PLC



25<sup>th</sup> January 2018

Planning Policy Team  
Reading Borough Council  
Civic Offices  
Bridge Street  
Reading  
RG1 2LU

Dear Sir / Madam

**MAKRO, ELGAR ROAD SOUTH, READING, RG2 0DD**

On behalf of our client, Booker Group PLC (hereafter 'Booker'), we write to make representations on the Pre-Submission Draft Reading Borough Local Plan (Regulation 19) consultation document, which was published for consultation in November 2017.

**INTRODUCTION**

These representations are made on behalf of Booker Group, the owners and operators of the Makro store at Elgar Road South, Reading. The site has been promoted by our client through the early stages of the emerging Local Plan preparation and these representations are made in the context of the draft allocation of the site as part of the 'South of Elgar Road Major Opportunity Area'.

Colliers International submitted representations on behalf of our client to the "Issues and Options" consultation in June 2017. As part of these representations, our client demonstrated that the site is suitable for a residential-led mixed use scheme.

Our client therefore wishes to engage with the Council as the Local Plan develops, and welcomes that the 'South of Elgar Road Major Opportunity Area' continues to be identified for a residential-led allocation in the Pre-Submission Draft Reading Borough Local Plan. These representations are therefore made in response to the Pre-Submission Draft Reading Borough Local Plan consultation.

These representations provide a response to the inclusion of the site as part of the 'South of Elgar Road Major Opportunity Area' and the policies proposed as part of the Draft Local Plan more generally.

**AREA SPECIFIC SECTIONS – SOUTH READING**

Chapter 6 of the consultation document sets out the strategy for South Reading and confirms that it will be the location for a significant amount of new residential and employment over the plan period. Booker

welcome the objective to accommodate around 3,100 homes in South Reading in the period up to 2036, as set out in the Issues and Options document, has been given further consideration and has now been increased to 3,700 homes between 2013 and 2036. This is an increase from 21% to 24% of the total planned for in the Borough.

Policy SR3 continues to allocate the 'South of Elgar Road Major Opportunity Area' for residential use (330-500 dwellings). As set out previously, we welcome this approach and consider that the site provides an opportunity to provide much needed housing within the borough and is in an appropriate location to deliver this.

In our previous representations, we requested that Policy SR3 provided sufficient flexibility for uses other than residential to also be delivered on the site as part of a mixed use scheme in the future. Booker consider that a well-designed scheme could incorporate both residential and commercial elements (including a replacement Makro store). We therefore welcome that Policy SR3 has been amended to include reference to the potential for commercial uses to be incorporated as part of any future mixed-use development.

We also welcome that part i) of Policy SR3 has been amended to allow for greater flexibility in the measures that could be utilised to ensure that there are no adverse effects on the amenity of the proposed new homes as a result of their proximity to adjacent industrial and warehouse uses. We acknowledge that residential amenity should not be compromised, but consider that an appropriate buffer, as proposed in the earlier iteration of Policy SR3, may not be the only suitable means of achieving this.

As set out in our previous representations, it is welcomed that the Council confirm that the quantum of residential units (330-500) to be provided within the site allocation is indicative. The number of dwellings to be delivered on the site would be dependent on the scale, massing and quantum of development which includes other uses as part of a mixed use development and the Opportunity Area being redeveloped in its entirety, including both the Makro site and adjacent land in separate ownership. The flexibility provided by setting out an indicative range, in relation to the capacity of the site, is therefore welcomed. However, in order to achieve the number of dwellings set out by Policy SR3, whether at the lower or upper end of the indicative range, it will be necessary for a high density of development to be achieved. We would therefore request that this is acknowledged by the Council at Policy SR3 and suggest the following wording could be added:

*"The redevelopment of the site offers an opportunity to accommodate high density development."*

Booker also acknowledge and support the proposal to enhance pedestrian access between Elgar Road and Waterloo Meadows. We also consider that vehicular access could be improved through the addition of a further access point along Elgar Road South. This will allow greater flexibility and allow the relationship between residential and commercial uses to be more effectively managed. Booker appreciate that further technical transport work will be required as part of a future application for the site, but would request that the key diagram for the 'South of Elgar Road Major Opportunity Area' is updated to identify the proposed additional access point. Figure 1, included below, indicates the proposed location for the additional access point.

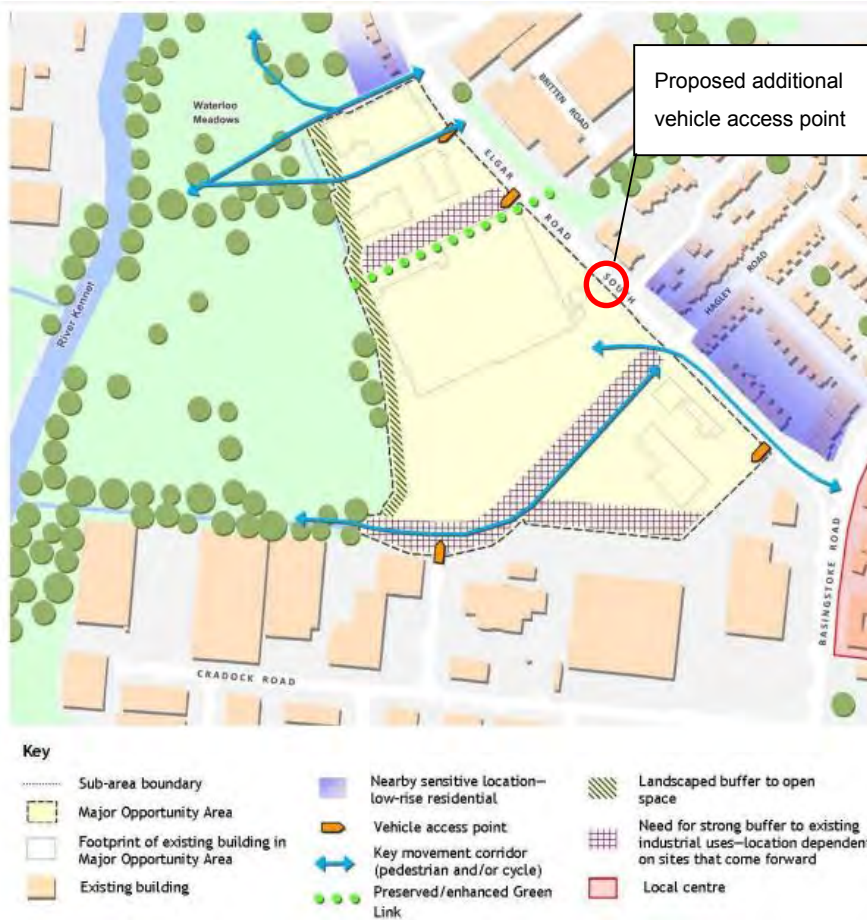


Figure 1. Proposed amendment to South of Elgar Road Major Opportunity Area Strategy

**GENERAL POLICIES**

Chapter Four gives consideration to the detailed policies required to deliver the Borough’s needs over the Plan period. A number of these policies are relevant to the redevelopment of the Makro site, and we have set out our responses to these policies in turn below and overleaf.

Housing Density and Mix

We agree that, in general, Policy H2 is a suitable approach to assessing housing density and mix in new developments.

As set out in previous representations, a bespoke approach, as indicated by Policy H2, is often most appropriate when assessing development proposals. We would therefore support a policy approach to housing mix that allows for the constraints and opportunities of each development site to be taken into account, and does not set overly prescriptive requirements that would not be appropriate in all areas. It is welcomed that the requirement for 50% of dwellings to be of 3 bedrooms or more will have regard to all other material considerations. However, we consider that the policy should be amended to confirm that the requirement for 50% of dwellings to be of 3 bedrooms or more should also be subject to the site being suitable, feasible and viable for this type of residential development. Notwithstanding, the

development of the South of Elgar Road Major Opportunity Area would make a significant contribution to the delivery of a significant number of homes required in the Borough and could accommodate a mix of dwellings.

Policy H2, as set out in the Issues and Options consultation document, included a requirement for residential proposals for ten houses or more (excluding affordable homes) to include at least 10% of plots as self-build. We welcome that the requirement has been removed, with developers now encouraged to consider providing self-built housing. The provision of self-built plots is likely to have had a significant effect on the viability of residential schemes in the Borough, so this should be given careful consideration.

### Affordable Housing

The Council has set out at Policy H3 that, on sites of 10 or more dwellings, it will seek the provision of 30% affordable housing, as far as it is viable. We note that this policy remains unchanged from the Issues and Options consultation document.

As set out in previous representations, we support this approach and consider that developers should be given the opportunity to submit evidence which demonstrates the level of affordable housing that can be provided without jeopardising the viability of the development. This is in accordance with the NPPF which states that in pursuing sustainable development, careful attention to viability and costs in plan-making and decision-taking must be taken and that plans should be deliverable (Paragraph 179 of the NPPF).

### Design

We agree that a high quality of design is required for all developments, as it is an integral part of ensuring the delivery of sustainable development, as set out in the NPPF (Chapter 7). Policy CC7 should seek to address the points listed at paragraph 58 of the NPPF in order to ensure compliance with the national guidance.

We would welcome a policy approach which would provide sufficient flexibility for design of development to be guided through individual circumstances rather than being dictated by strict policy requirements, along with confirmation that design criteria will only be considered where material to an application.

We would also welcome a design policy that avoids unnecessary prescription or detail and which concentrates on *“guiding the overall scale, density, massing, height, landscape, materials and access of new development”*, in accordance with Paragraph 59 of the NPPF.

### Energy and Renewables

As set out in previous representations, we agree that, in order to meet the requirements set out in the NPPF, it is necessary to include a policy in the Local Plan which promotes the use of energy from renewable or low carbon sources, and in this regard Policy CC4 is appropriate. However, the requirements should be subject to viability and allow sufficient flexibility for developers to provide justification to provide carbon reduction measures that are appropriate for the needs of development.



In this respect, we support that Policy CC4 sets out that the requirement for decentralised energy provision, within the site, is subject to the site being suitable, feasible and viable for this form of energy provision.

## **CONCLUSION**

As set out in these representations, Booker supports the allocation of the Makro site at Elgar Road South within the 'South of Elgar Road Major Opportunity Area' and the principles put forward in the Draft Local Plan in general. We welcome that the amendments to Policy SR3 that were suggested by Booker in previous representations have been incorporated. As set out in these representations, we also request that additional amendments in relation to the density of development and vehicular access for the 'South of Elgar Road Major Opportunity Area' are considered.

In relation to more technical elements of the emerging Local Plan, it is considered that flexibility is required in respect of a number of policy options. In this regards, we welcome the approach that has been taken to the more technical policies proposed thus far.

We trust that our representations will be given full consideration through the Draft Local Plan consultation process and that our details will continue to be included on the Council's database to ensure we are notified of all future stages of the document.

We would be grateful for confirmation of receipt of the representations.

Yours sincerely,



**Leigh Thomas**  
**For and on behalf of Colliers International**

BRACKNELL FOREST BOROUGH COUNCIL



Planning Policy Team,  
Reading Borough Council,  
Civic Offices,  
Bridge Street,  
Reading,  
RG1 2LU

By email to: [planningpolicy@reading.gov.uk](mailto:planningpolicy@reading.gov.uk)

23<sup>rd</sup> January 2018

Dear Planning Policy Team,

## **PRE-SUBMISSION READING BOROUGH LOCAL PLAN**

Thank you for your email inviting comments on the above Regulation 19 document.

Bracknell Forest Council is pleased to see that most of the comments provided on the draft Local Plan have been taken into account. Having looked at the Pre-submission Draft Reading Borough Local Plan and expected levels of development, this Council would like to make the following comments.

### **Employment**

It is noted that Policy EM1 aims to meet the Borough's employment needs in full, and provides a contribution of 60,000 sqm of office floorspace to the wider Central Berkshire Functional Economic Market Area (FEMA). It is noted that this will need to be balanced against housing provision in the wider area.

As previously stated, on the basis of the evidence currently available to this Council, it is unlikely that Bracknell Forest will be able to meet its needs for 'B' Class floorspace as set out in the Central Berkshire Economic Development Needs Assessment. Our 'Call for Sites' exercises have resulted in minimal interest in new sites being promoted for employment development. Whilst we will be commissioning further studies to assess market conditions, consideration needs to be given to the future potential of our defined employment areas. It is considered that there will be a need to discuss the accommodation of some of our unmet needs with other Authorities in the Central Berkshire FEMA, including Reading Borough. The provision and contribution to the FEMA made through Policy EM1 is therefore welcomed.

It is noted that Policy EM3 seeks to avoid the loss of employment land within core employment areas unless it can be demonstrated there is no long term use for it. It is questioned how effective this will be in limiting the amount of land lost to housing due to the

Prior Approval process, should this be an issue in Reading Borough. Bracknell Forest Council has an Article 4 direction in respect of Bracknell's largest designated Employment Areas coming into force on 27<sup>th</sup> February 2018, in order to regulate the loss of employment floorspace to housing.

### **Housing**

Policy H1 seeks to allocate land for 15,433 homes (671 per annum) for the period 2013-2036. This is an increase compared to the previous version of the draft Local Plan which is supported. The Berkshire (including South Bucks) Strategic Housing Market Assessment (SHMA) concluded that there was a need for 16,077 homes (699 per annum) over the same period. Therefore, there is a shortfall of 644 dwellings (previously 943 dwellings). It is noted that the Western Berkshire Housing Market Area Strategic Planning Framework acknowledges that there may be a shortfall in Reading Borough and that collaborative working will be required. Bracknell Forest Council believes that in order to meet local need, the unmet need should be addressed as close to Reading as is possible.

It is also noted that the draft Local Plan contains a policy to help address the shortfall of affordable housing within the Borough. The SHMA identified a need of 406 affordable dwellings per annum in Reading Borough. Since this forms a significant part of the Borough's overall need, there may be viability issues in delivering this amount of affordable housing, even with Policy H3 requiring contributions (either financial, or on site provision) from all development involving a net increase in housing (C3). Some concern is expressed that this may have implications for the wider HMA.

Paragraph 4.4.7 sets out indicative density ranges for Town Centre, urban and suburban areas. Whilst it is noted that this paragraph has been expanded to reference Policy CC6 and provide an example of how it is indicative and not a hard-and-fast rule, it is still considered that application of these densities could have consequences for the ability to deliver dwellings and meet needs – this particularly applies to 'fringe' areas.

The intention to provide at least 253 residential care spaces in C2 use (Policy H6) in addition to the overall housing need is welcomed. This appears to meet the need for Reading Borough, as identified in the SHMA.

### **Gypsies and travellers**

Policy H13 sets out criteria for new traveller sites, and the supporting text sets out the results of the Gypsy and Traveller Accommodation Assessment (GTAA). It is understood that following no sites being put forward, the Council has undertaken a review of its own land to try and accommodate the need for between 10-17 permanent pitches, but none are considered suitable (para. 4.4.100). It is noted that Reading Borough Council is currently looking to its neighbours to meet the shortfall, through Duty to Cooperate discussions. Bracknell Forest Council believes that in order to meet local need, the unmet need should be addressed as close to Reading as is possible.

Bracknell Forest Council is supportive of Policy WR4 'Potential Traveller Transit site at Cow Lane' to help address the increase in unauthorised encampments in and around Reading. It is noted that there are potential conflicts with existing commercial operations that could be affected, including the fact the site is currently used as part of the annual Reading Festival.

For information, Bracknell Forest Council has also commissioned consultants to carry out an up to date assessment of needs. The Council is still considering the results of the study, which includes a requirement for permanent pitches and a transit site as part of a strategic cross-boundary solution.

## **Retail**

It is noted that the retail floorspace quoted in Policy RL2 has been amended from, 44,600 sqm to 34,900 sqm as set out in the Western Berkshire Retail and Commercial Leisure Assessment 2016, and that this figure combines comparative and convenience floorspace since changes between these uses can occur under permitted development rights. Though the Assessment sets out that this is net, it is still unclear from Policy RL2 whether this is net or gross floorspace. Bracknell Forest Council welcomes allocation Policies for major opportunity areas (CR11, CR12 and CR13) and Policies WR3 and ER1 which seek to meet this need in full.

## **Health**

Bracknell Forest Council is pleased that concerns over the wording of the third paragraph in Policy ER3, which stated that “...*would be supported where it would ensure that such a move would enhance its accessibility to Reading residents...*” has been amended to include ... “*and the rest of its catchment.*”

## **Infrastructure**

Bracknell Forest Council is supportive of Policy TR2 with regards to its identification of the National Cycle Network Route 422, which will link Newbury to Windsor, including parts of Bracknell Forest.

The evolving IDP strategy adopted by Reading Borough Council for the new planned development in the borough and associated infrastructure necessary to support this growth is supported. Bracknell Forest Council welcomes the aim to engage in joint cross boundary arrangements with neighbouring authorities considering major infrastructure projects that span beyond the administrative area, and to secure infrastructure funding via the Thames Valley Berkshire Local Enterprise Partnership (TVBLEP).

## **Transport**

Comments on the Local Plan transport modelling have already been provided separately in an email dated 31 October 2017, which related to concerns that the study area of the modelling did not include Bracknell Forest schemes, or importantly the addition of the Lexicon. It was noted that the ability of our network to allow movement between the M3 and M4 motorways impacts on the study area and that improvements and developments in Bracknell should be taken into consideration. In addition, it was noted that there was no mention of the forthcoming smart motorway improvements on the M4. To date we have had no further correspondence on these issues raised, and the transport modelling work did not appear to be available on the Reading Borough Council website. As such this remains an outstanding concern that needs to be addressed through Duty to Co-operate discussions. We would expect these matters to be resolved ahead of the Planning Inquiry into the Reading Borough Local Plan.

## **Other**

It is noted that in addition to new Policy WR4 (Potential Traveller Transit site at Cow Lane) on which comments are included above, the pre-submission version of the Local Plan includes two other new policies EN17 (Noise generating equipment) and H4 (build to rent schemes). Bracknell Forest Council has no comments to make on these two new policies.

## **Duty to Cooperate**

The Duty to Cooperate Statement (November 2017) lists in Appendix 2 a chronology of meetings and consultations, including some with Bracknell Forest Council. This Council

publishes an AMR on Duty to Cooperate<sup>1</sup> which records some Duty to Cooperate events with Reading Borough Council.

As stated before, ongoing co-operation between this Authority and Reading Borough Council should include the topic areas of employment, housing (including Gypsies and Travellers), transport and health. Bracknell Forest Council is due to consult on its Draft Local Plan in February/ March 2018. Given the strategic nature of some issues both Local Plans identify, it will be necessary to hold some Duty to Cooperate meetings in the coming months.

### **Tests of Soundness**

Positively prepared – Although Bracknell Forest Council notes there is a shortfall of 644 dwellings against the plan period requirement, the Western Berkshire Housing Market Area Strategic Planning Framework (of which Bracknell Forest Council is a partner) acknowledged that there may be a shortfall in Reading Borough and that collaborative working will be required. Some concern is expressed about meeting the affordable housing requirements and implications for the wider HMA. Bracknell Forest Council is pleased Reading Borough Council is seeking to meet its full objectively assessed need with regards residential accommodation (C2).

It is noted that Reading has unmet need with regards to Gypsy and Traveller permanent pitch provision and will be looking to its neighbours to assist with this through Duty to Cooperate discussions.

Bracknell Forest Council welcomes the provision and contribution of employment floorspace to the FEMA made through Policy EM1.

Justified – As mentioned under Transport above, Bracknell Forest Council considers further work is required on transport modelling. Bracknell Forest Council has reviewed the Sustainability Appraisal and notes that several omission sites are currently in active use (mainly in employment areas) but considers that these may come forward as windfall sites during the plan period. However it is considered that whilst it is not always clear why some omission sites are not being proposed for allocation, any scope for development of such sites is unlikely to alter the overall conclusion that Reading cannot meet its own housing (C3) need.

Effective – as above, along with three other authorities including Bracknell Forest Council, Reading Borough Council was involved in the development of the Western Berkshire Housing Market Area Strategic Planning Framework. It is noted that there is unmet housing (C3 use) need and also unmet Gypsy and Traveller pitch need within Reading, and that Reading Borough Council hopes these will be resolved through Duty to Cooperate.

It is welcomed that the Local Plan will contribute to employment floorspace in the FEMA. Bracknell Forest Council is also supportive of the proposed Traveller transit site (Policy WR4).

Consistent with national policy – As mentioned under Transport above, Bracknell Forest Council considers further work is required on transport modelling. It is noted that Reading Borough Council has unmet housing need (C3) and Gypsy and Traveller pitch need, which it is seeking to resolve through Duty to Cooperate discussions.

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<sup>1</sup> [https://files.bracknell-forest.gov.uk/sites/bracknell/documents/amr-duty-to-cooperate.pdf?Up9oVrnZgLvT89.zAtfE\\_.GnuimIW.eH](https://files.bracknell-forest.gov.uk/sites/bracknell/documents/amr-duty-to-cooperate.pdf?Up9oVrnZgLvT89.zAtfE_.GnuimIW.eH)

We look forward to holding further discussions with you.

Yours sincerely



Andrew Hunter  
Chief Officer: Planning, Transport and Countryside  
[andrew.hunter@bracknell-forest.gov.uk](mailto:andrew.hunter@bracknell-forest.gov.uk)  
Planning, Transport and Countryside  
Direct dial: 01344 351907

BRITISH SIGN AND GRAPHICS ASSOCIATION



Please return by Friday 26<sup>th</sup> January 2018 to: Planning Policy, Civic Offices,  
 Bridge Street, Reading, RG1 2LU or email [planningpolicy@reading.gov.uk](mailto:planningpolicy@reading.gov.uk)

**PART A - YOUR DETAILS**

**Personal Details**

**Agent's Details (if applicable)**

Title

~~\_\_\_\_\_~~

MR

First Name

~~\_\_\_\_\_~~

CHRIS

Last Name

~~\_\_\_\_\_~~

THOMAS

Job Title (if applicable)

~~\_\_\_\_\_~~

OUTDOOR ADVERTISING  
 CONSULTANT

Organisation (if applicable)

BRITISH SIGN &  
 GRAPHICS  
 ASSOCIATION

2 BELL BARN ROAD

Address 1

~~\_\_\_\_\_~~

STOKE BISHOP

Address 2

~~\_\_\_\_\_~~

BRISTOL

Address 3

~~\_\_\_\_\_~~

BRISTOL

Town

~~\_\_\_\_\_~~

BRISTOL

Post Code

~~\_\_\_\_\_~~

BS9 2DA

Telephone

~~\_\_\_\_\_~~

07957 970080

E-mail

~~\_\_\_\_\_~~

chris@chris-thomas-uk.co.uk

READING BOROUGH COUNCIL  
 01 DEC 2017  
 PLANNING

**PART B - YOUR REPRESENTATION** (please use a separate form for each representation)

**B1. To which part of the Local Plan does this representation relate?**

PART 4 - OUK - Paragraphs 4.7.24 - 4.7.31

**B2. Do you consider that the Local Plan:** (please tick as appropriate)

Is legally compliant?

Yes

No

Is sound?

Yes

No

Fulfils the duty to co-operate?

Yes

No

**B3. Please provide details of why you think the Local Plan, or part of the plan, is or is not legally compliant, sound and/or complies with the duty to co-operate.**

SEE ATTACHED LETTER

*Please continue on another sheet if necessary*

**B4. Please set out the modifications that you think would make the Local Plan, or part of the plan, legally compliant and/or sound. Please provide specific wording where possible.**

**SEE ATTACHED LETTER**

*Please continue on another sheet if necessary*

**B5. If you are seeking a modification to the plan, do you wish to appear in person at the public examination?**

Yes

No

**B6. If you wish to appear in person, please briefly outline why you consider this necessary.**

**B7. Do you wish to be kept informed of planning policy matters?**  
(please tick as appropriate)

Please keep me informed of the progress of this Local Plan:

Please keep me informed of all planning policy matters:

## **Chris Thomas**

### ***Outdoor Advertising Consultant***

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2 Bell Barn Road, Stoke Bishop, Bristol BS9 2DA  
chris@christhomasltd.co.uk  
Mobile: 07957 870080

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Planning Policy  
Reading Borough Council  
Civic Offices  
Bridge Street  
Reading RG1 2LU

30 November 2017

Dear Sir/Madam,

#### **Reading BC Local Plan – Submission Draft, November 2017**

These representations are submitted on behalf of the British Sign and Graphics Association (BSGA) in response to Policy OU4 and supporting text in this draft Local Plan.

The BSGA represents 65% of the sales of signage throughout the UK and monitors development plans throughout the country to ensure the emerging Local Plan policies do not inappropriately apply more onerous considerations on advertisements than already apply within the NPPF, PPG and the Town and Country Planning (Control of Advertisements)(England) Regulations 2007.

We commented on the Consultation Draft of this Local Plan on 4 May 2017 (copy attached). Whilst we appear on the Consultees List within the Statement of Consultation, we do not appear in Appendix 7 as having our representations considered. Either our letter went astray or you have ignored our representations. We therefore repeat our original comments (the paragraphs are re-numbered to match the Submission Draft).

Generally, we are content that Policy OU4 itself reflects the law and advice in national planning policy and practice. But we remain concerned that parts of the supporting text are unreasonable and excessive.

Paragraph 4.7.26 seeks to expand upon, rather than clarify, policy OU4. It picks out projecting box-type signs, bulky "folded" box fascia signs, uplighters and downlighters as "likely to detract from the character of an area". We would wish to know what a "folded" box fascia sign is? We have never heard of this term. But internally illuminated (including fully illuminated) fascia and projecting signs are common throughout the commercial centres within Reading Borough. An internally illuminated projecting sign must have a "box" shape (no matter how slim or whether rectangular or round) to contain a light source. And how can the preferred external illumination be achieved without "uplighters" or "downlighters" (and the text is ambiguous in saying that slim-line downlighters" may be acceptable). In order to externally illuminate a



sign, light will necessarily be cast up or down towards the sign's face (horizontal is generally offensive to pedestrians). Similarly, signs above ground floor level are said to be "likely to have detrimental effects on visual amenity". These assumptions are not supported by policy OU4 which, properly, requires all advertisements to be considered on individual merit in terms of size, location, design etc.

We appreciate the Council's concerns about the type and quality of advertisements. But we consider that much of paragraph 4.7.26 is misleading (though well-intentioned). We would suggest that the paragraph be deleted after the second sentence and replaced with:

"Bulky box fascia and projecting signs, often crudely attached onto existing fascias, create a poor visual impression and will not generally be acceptable. Illumination may be internal or external. Internally illuminated lettering or halo illumination can provide an interesting and subtle effect (and avoids the need for extraneous lighting elements, cables etc). Fully face illuminated signs can be dominant and intrusive and should therefore be proposed with caution. External illumination may be by spotlight or downlight from trough or similar. Care should be taken with the design, position and direction of external light fittings so as to achieve the desired effect without undue light spillage. Uplighters should generally only be used where it is desired specifically to light the façade of the premises as well as any signage. Advertisements above ground floor level may be acceptable where the scale and design of the building can accommodate advertising without dominating the building or surrounding area."

The final sentence of paragraph 4.7.30 appears to have been added as an afterthought. It does not reflect reality, is unnecessary and should be deleted.

Finally, paragraphs 4.7.29 - 30 are out of date - the ILE Technical Report No 5 has been superseded. The correct detail is now found in the Institute of Lighting Professionals Guide PLG05 (2014) - see pages 23 and 24 (and note that the recommended maxima are for night time only).

It is hoped that these comments are found to be useful and informative, if you have any further questions, please contact me.

Additionally, since our original letter appears to have disappeared, I should be grateful for acknowledgment of this letter.

Yours faithfully

A large black rectangular redaction box covering the signature area.

**Chris Thomas**  
**for British Sign and Graphics Association**

**Chris Thomas**  
*Outdoor Advertising Consultant*

---

2 Bell Barn Road, Stoke Bishop, Bristol BS9 2DA  
chris@christomasltd.co.uk  
Mobile: 07957 870080

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Planning Policy Team  
Reading Borough Council  
Civic Offices  
Bridge Street  
Reading RG1 2LU

4 May 2017

Dear Sir/Madam,

**Reading BC Local Plan – Consultation Draft, May 2017**

These representations are submitted on behalf of the British Sign and Graphics Association (BSGA) in response to Policy OU4 and supporting text in this draft Local Plan.

The BSGA represents 65% of the sales of signage throughout the UK and monitors development plans throughout the country to ensure the emerging Local Plan policies do not inappropriately apply more onerous considerations on advertisements than already apply within the NPPF, PPG and the Town and Country Planning (Control of Advertisements)(England) Regulations 2007.

Generally, we are content that Policy OU4 itself reflects the law and advice in national planning policy and practice. But we remain concerned that parts of the supporting text are unreasonable and excessive.

Paragraph 4.7.25 seeks to expand upon, rather than clarify, policy OU4. It picks out projecting box-type signs, bulky "folded" box fascia signs, uplighters and downlighters as "likely to detract from the character of an area". We would wish to know what a "folded" box fascia sign is? We have never heard of this term. But internally illuminated (including fully illuminated) fascia and projecting signs are common throughout the commercial centres within Reading Borough. An internally illuminated projecting sign must have a "box" shape (no matter how slim or whether rectangular or round) to contain a light source. And how can the preferred external illumination be achieved without "uplighters" or "downlighters" (and the text is ambiguous in saying that slim-line downlighters" may be acceptable). In order to externally illuminate a sign, light will necessarily be cast up or down towards the sign's face (horizontal is generally offensive to pedestrians). Similarly, signs above ground floor level are said

to be "likely to have detrimental effects on visual amenity". These assumptions are not supported by policy OU4 which, properly, requires all advertisements to be considered on individual merit in terms of size, location, design etc.

We appreciate the Council's concerns about the type and quality of advertisements. But we consider that much of paragraph 4.7.25 is misleading (though well-intentioned). We would suggest that the paragraph be deleted after the second sentence and replaced with:

"Bulky box fascia and projecting signs, often crudely attached onto existing fascias, create a poor visual impression and will not generally be acceptable. Illumination may be internal or external. Internally illuminated lettering or halo illumination can provide an interesting and subtle effect (and avoids the need for extraneous lighting elements, cables etc). Fully face illuminated signs can be dominant and intrusive and should therefore be proposed with caution. External illumination may be by spotlight or downlight from trough or similar. Care should be taken with the design, position and direction of external light fittings so as to achieve the desired effect without undue light spillage. Uplighters should generally only be used where it is desired specifically to light the façade of the premises as well as any signage. Advertisements above ground floor level may be acceptable where the scale and design of the building can accommodate advertising without dominating the building or surrounding area."

The final sentence of paragraph 4.7.29 appears to have been added as an afterthought. It does not reflect reality, is unnecessary and should be deleted.

Finally, paragraphs 4.7.28 - 29 are out of date - the ILE Technical Report No 5 has been superseded. The correct detail is now found in the Institute of Lighting Professionals Guide PLG05 (2014) - see pages 23 and 24 (and note that the recommended maxima are for night time only).

It is hoped that these comments are found to be useful and informative, if you have any further questions, please contact me.

Yours faithfully



**Chris Thomas**  
for British Sign and Graphics Association

BROMMELL, HAYLEY



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**From:**  
**Sent:** 26 January 2018 15:12  
**To:** Planning Policy  
**Subject:** Reference Local Plan Section EN7N Item EN7Nn

**This is an EXTERNAL EMAIL. STOP. THINK before you CLICK links or OPEN attachments.**

Dear Sir / Madam

## Reference Local Plan Section EN7N Item EN7Nn

### REPRESENTATIONS

I wish to make representations regarding specific sections of the RBC Local Plan, particularly relating to the protection of public green open space where RBC have continue to progress proposals to build a new school. The sections I wish to make representations about are CC7, CC8, CC9, EN7 and RL6. My representations for each section are covered in more detail in the paragraphs below.

### CONTEXT

The ESFA proposal to build a school on charity land, held in trust for recreation and leisure only, in perpetuity. This objective is crystal clear and perpetuity means forever and is contrary to policies written in the current Local Plan. This calls into question the effectiveness of any Local Plan if exceptions are being made.

1. Why is Reading Borough Council disregarding the current local plan relating to green open space [which Reading has one of the lowest people ratios] and supporting [or allowing the proposal to get to the current stage] the ESFA proposal to build a primary school on Mapledurham Playing Fields (MPF)?

This makes a mockery of the entire reason for having a Local Plan.

See Draft Local Plan Page 40, Section EN7 which lists MPF as site EN7Nn and states: *"The following Local Green Spaces (LGS) and Public Open Space (POS), as shown on the Proposals Map, will be protected from development. Proposals that would result in the loss of any of these areas of open space, erode their quality through insensitive adjacent development or jeopardise their use or enjoyment by the public, will not be permitted".*

### CC7 Design & The Public Realm

#### Developments

The ESFA school proposal will:

1. Adversely impact the local character of the playing fields and surrounding area
2. The Heights school will only address the needs of a very small minority in the community, some 350 primary school aged children, out of a total population of beneficiaries of 171,000. The remaining 170,650 will be disadvantaged by the school if it goes ahead.
3. The two storey building will be visually unattractive and completely out of keeping with the adjacent single storey residential properties in Hewett Avenue, Hewett Close, and the A4074 Upper Woodcote Road.
4. A school will dominate the recreation ground and cause damage to the quality, character and amenity of the entire area.
5. There are many areas that need to be mitigated for the proposal to be acceptable.
6. RBC leisure department and many other official organisation have clearly stated that the school proposal is inadequate.

### CC8 Safeguarding Amenity

The ESFA Heights school proposal will cause a significant detrimental impact to the living environment of existing residential properties in the vicinity because of:

1. Reduction to the quality of the environment Infringement of human rights relating to the respect for private and family life

2. Lack of privacy and overlooking nearby houses
3. Visual dominance and overbearing effects of the two storey development
4. Harm to the outlook
5. Noise and disturbance
6. Artificial lighting
7. Hours of operation
8. Increase of traffic to the immediate area and great risk to the majority of pupils who will have to cross the A4074

#### CC9 Securing Infrastructure

The highest priority should be given to:

1. The loss of open space
2. Green infrastructure, vital to health and well-being for all age groups
3. Protection against the adverse effect to biodiversity

#### EN7N Local Green Space & Public Open Space

1. MPF, referenced EN7Nn is classified as LGS (Local Green Space) for the entire area of 10.86 hectares
2. Item 4.2.2.5 states *“The National Planning Policy Framework states that local communities, through local plans, are able to identify Local Green Space for specific protection which is of particular importance to them. The aim of this policy is therefore to define the boundaries of Local Green Space, based on the criteria in the NPPF. Local Green Spaces can only be designated during local plan preparation or review and must be capable of enduring beyond the end of the plan period.”*
3. The Local Community have spoken and written many times to both RBC and the Charity Commission asking for MPF to remain protected for perpetuity because of its particular importance to the high volume of daily users which includes over 500 members of Caversham Trents Football Club, over 500 dog walkers per week, around 350 Mapledurham Lawn Tennis Club members and other casual users. We have demanded a Deed of Dedication be put in place immediately but this request has been declined on several occasions by the Head of Legal Services.
4. If the Local Plan stands for anything, MPF is a true test case to show the will of the people being upheld by preventing a school from being built there against the desire of a small minority group of people who would like a school there.
5. 4.2.28 states that *“high quality open spaces, sport and recreation can make an important contribution to the health and well-being of communities”*.
6. If a school is built on MPF it will detrimentally effect air quality and significantly worsen it because of the high concentration of up to 350 cars, twice per day, dropping off and collecting children from school. There will also be the arrival and departure of teachers, assistants, administrators, delivery vehicles and buses for school trips etc. Measures, such as those which are shown in the Air Quality Management Area report will do little to mitigate against the drop in air quality and resultant impact to the health and well-being of local residents.
7. A school will also cause a detrimental impact to those items listed at CC8 above including noise pollution, traffic movement, light pollution, impact to the biodiversity and wildlife, overlooking and out of keeping with all other residential structures in the area and much more.

#### RL6 Protection of Leisure Facilities and Public Houses

This section states:

1. *“Existing leisure facilities (or public houses) outside the Central Area will generally be retained, and there is a strong presumption in favour of retaining leisure facilities (or public houses) where they are the only facility of their type in a district, major local or local centre. Developments that would result in the loss of a leisure facility (or a public house) outside the Central Area will not be permitted unless it can be clearly demonstrated that:*
  2. *a. There is no need for this type of facility in this area; or*
  3. *b. The function of the facility can be adequately fulfilled by an existing facility, or a facility proposed as part of the development, where that facility would be at least as accessible to the same catchment; or*
  4. *c. The impacts on amenity of residents of retaining the facility could not be dealt with through other measures, and would be so severe as to outweigh the benefits to the wider community of retaining the facility.*

Mapledurham Playing Fields has a pavilion which is the only community inclusion hub in the entire area west of the A4074 in Caversham. Loss of this facility would mean that there is nowhere in the vicinity for local groups of all ages to hold clubs such as Bridge, Scrabble, Scouts, Guides, Playgroups, Toddler Groups, Farmers Market, Fund Raising and many other events which cannot be held in other venues, such as school halls, due to the limitations of use during school hours. These include pre-school and after school clubs, all of which limit the use of such facilities to the point they cannot fulfil the needs of the local community groups.

This same community has been denied a community hub for the last two years, this cannot continue and work should begin immediately.

#### NEED FOR A SCHOOL QUESTIONABLE

Proposals to build a primary school should not take precedent over the protection of public green open space, which is in short supply across Reading Borough, and especially trust land which RBC do not own.

An important point to note is that the business case to build a school on MPF was predicated on a childbirth forecast produced for 2009 to 2015. There has been no update of primary school place forecasts since the report which was submitted to the ESFA by parents in 16 April'12. Data now available from the Office of National Statistics, produced 6 years later, shows a marked decline in birth rates between 2009 and 2015, which has dropped by 84. This means that effectively 84 less Primary school places in Caversham will be needed by 2020. This eliminates the long term need for additional primary school places north of the River Thames as the number of new children could be easily accommodated in the existing primary schools in the area.

If primary school places in Caversham are needed, these can be addressed by a number of other solutions available to RBC which will address provision of education in the area without the need to sell off trust land and lose green public open space. An officer from RBC for education talked about contingency plans which exist and could be implemented with immediate effect. The best option probably being to invest in expanding existing primary schools and protecting the open space at MPF through a volunteer run enhancement scheme.

Why aren't the subcommittee of Mapledurham Playing Fields, applying the current Local Plan which would help to protect Mapledurham Playing Fields from the proposals of the EFSA?

Why are Reading Borough Council not developing the site of Caversham Primary School which would amply cater for the number of children proposed? Caversham Primary School is the epicentre of where the majority of potential school pupils currently live - why would the Council choose to build the school in the furthest periphery of the catchment area, 1 mile from the epicentre of the catchment area in central Caversham, which would mean children walking or being driven up a steep hill and across a busy A-road to reach MPF?

Why haven't Reading Borough Council offered Hemdean Bottom as the site for the school? A site that they already own, in the centre of the catchment area and where the Council had originally planned to build a new school in the 1990s? It could have been built by now!

The site for a new primary school, if necessary should not be a popularity vote. It should be where it is needed, preferably on a brownfield site and certainly not a precious green open space.

#### SUMMARY

I am aware that representations made at this stage will feed directly into the public examination of the Local Plan, which is expected to take place during Spring/Summer 2018, and appreciate that such representations at this stage will be provided to the independent Inspector appointed to examine the plan as evidence, and will therefore need to be published on the Council's website.

I welcome my representations being published. I request that my questions and comments are also given to the independent Inspector appointed to examine the proposed new Local Plan. Please send confirmation when this has been undertaken.

If the current, existing Local Plan had been strictly adhered to with regards to MPF, residents would not now have been suffering 4 years of anxiety and stress, never knowing whether RBC will ignore that Plan by overriding its own mandate to protect public green open spaces and especially MPF, in order to allow a school to be built. This is

despite the need for the school to be highly questionable and the fact that the entire site should be protected for perpetuity by the Recreation Ground Charity 304328 trust.

On this basis alone, it is questionable as to whether the Local Plan is a) legally compliant, b) sound, c) fulfils the duty to co-operate, as it is currently failing on all three counts. For the Local Plan to be effective, it must be robust and, importantly, be upheld in every respect by RBC throughout the duration of its life expectancy.

***Regards***

***Hayley Brommell***

Click [here](#) to report this email as spam.

BROMMELL, MARTIN

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**From:** martin brommell  
**Sent:** 22 January 2018 20:56  
**To:** Planning Policy; Eatough, Richard  
**Subject:** Reading Borough Council - Pre-Submission Draft Local Plan

**This is an EXTERNAL EMAIL. STOP. THINK before you CLICK links or OPEN attachments.**

## Reading Borough Council - Pre-Submission Draft Local Plan

*Under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012*

November 2017

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Dear Sir/Madam,

I wish to make representations regarding specific sections of the RBC Local Plan, particularly in the context of the protection of public green open space where other priorities occur, such as the desire to build a new school. The sections I wish to make representations about are CC7, CC8, CC9, EN7 and RL6. My representations for each section are covered in more detail in the paragraphs below.

### CONTEXT

The context around which my representations are based are the current actions of RBC, acting as trustees of the Recreation Ground Charity 304328, in which they are allowing a proposal by the ESFA to progress. This is contrary to policies written in the current Local Plan. This calls into question the effectiveness of the Local Plan over lengthy periods of time.

The current proposal being considered by RBC is to allow a 350 pupil primary school to be built on public green open space at Mapledurham Playing Field, which is charitable trust land and classified LGS. The land was generously gifted to the residents of Reading Borough and Mapledurham Parish in 1938. The object of the trust governing the site is the provision of recreation and leisure facilities only (not education) at MPF for perpetuity. This objective is crystal clear and perpetuity means forever.

Attempts to progress the ESFA proposal fly in the face of sections of the Draft Local Plan and specifically Page 40, Section EN7 which lists MPF as site EN7Nn and states: *"The following Local Green Spaces (LGS) and Public Open Space (POS), as shown on the Proposals Map, will be protected from development. Proposals that would result in the loss of any of these areas of open space, erode their quality through insensitive adjacent development or jeopardise their use or enjoyment by the public, will not be permitted".*

If such insensitive developments will not be permitted, why has the RBC sub-committee and RBC Head of Legal Services allowed the ESFA's proposals to progress instead of immediately preventing progression of the ESFA's proposals by upholding the Local Plan governance? Allowing the ESFA proposals to reach the stage they have, makes a mockery of the entire reason for having a Local Plan. This needs to be quickly addressed.

### REPRESENTATIONS

I wish to challenge the following sections of the Draft Local Plan specifically against the ESFA case to build The Heights school on MPF.

#### CC7 Design & The Public Realm

##### Developments

The ESFA school proposal will:

- Adversely impact the local character and distinctiveness of the playing fields and surrounding area

- The Heights school will only address the needs of a very small minority in the community, some 350 primary school aged children, out of a total population of beneficiaries of 171,000. The remaining 170,650 will be disadvantaged by the school if it goes ahead.
- If the school is allowed to be built, it will be visually unattractive and completely out of keeping with the single storey residential properties which are in close proximity situated in Hewett Avenue, Hewett Close, Blagrove Lane, A4074 Upper Woodcote Road.
- MPF is a highly valued residential area, worthy of protection from the damaging and insensitive development being proposed by the ESFA.
- A school will dominate the recreation ground and cause damage to the quality, character and amenity of the entire area.

#### CC8 Safeguarding Amenity

The ESFA Heights school proposal will cause a significant detrimental impact to the living environment of existing residential properties in the vicinity because of:

- Privacy and overlooking
- Visual dominance and overbearing effects of the development
- Harm to the outlook
- Noise and disturbance
- Artificial lighting
- Hours of operation
- Effects of traffic movements
- Reduction to the quality of the environment

#### CC9 Securing Infrastructure

The highest priority should be given to:

- The loss of open space
- Green infrastructure, vital to health and well-being for all age groups
- Protection against the adverse effect to biodiversity

#### EN7N Local Green Space & Public Open Space

- MPF, referenced EN7Nn is classified as LGS (Local Green Space) for the entire area of 10.86 hectares
- Item 4.2.2.5 states *“The National Planning Policy Framework states that local communities, through local plans, are able to identify Local Green Space for specific protection which is of particular importance to them. The aim of this policy is therefore to define the boundaries of Local Green Space, based on the criteria in the NPPF. Local Green Spaces can only be designated during local plan preparation or review and must be capable of enduring beyond the end of the plan period.”*
- The Local Community have spoken and written many times to both RBC and the Charity Commission asking for MPF to remain protected for perpetuity because of its particular importance to the high volume of daily users which includes over 500 members of Caversham Trents Football Club, over 500 dog walkers per week, around 350 Mapledurham Lawn Tennis Club members and other casual users. We have demanded a Deed of Dedication be put in place immediately but this request has been declined on several occasions by the Head of Legal Services.
- If the Local Plan stands for anything, MPF is a true test case to show the will of the people being upheld by preventing a school from being built there against the desire of a small minority group of people who would like a school there.
- 4.2.28 states that *“high quality open spaces, sport and recreation can make an important contribution to the health and well-being of communities”*.
- If a school is built on MPF it will detrimentally effect air quality and significantly worsen it because of the high concentration of up to 350 cars, twice per day, dropping off and collecting children from school. There will also be the arrival and departure of teachers, assistants, administrators, delivery vehicles and buses for school trips etc. Measures, such as those which are shown in the Air Quality Management Area report will do little to mitigate against the drop in air quality and resultant impact to the health and well-being of local residents.
- A school will also further cause a detrimental impact to those items listed at CC8 above including noise pollution, traffic movement, light pollution, impact to the biodiversity and wildlife, overbearing and overlooking, out of keeping with all other residential structures in the area and much more.

#### RL6 Protection of Leisure Facilities and Public Houses

This section states:

- *“Existing leisure facilities (or public houses) outside the Central Area will generally be retained, and there is a strong presumption in favour of retaining leisure facilities (or public houses) where they are the only facility of their type in a district, major local or local centre. Developments that would result in the loss of a leisure facility (or a public house) outside the Central Area will not be permitted unless it can be clearly demonstrated that:*
  - *a. There is no need for this type of facility in this area; or*
  - *b. The function of the facility can be adequately fulfilled by an existing facility, or a facility proposed as part of the development, where that facility would be at least as accessible to the same catchment; or*
  - *c. The impacts on amenity of residents of retaining the facility could not be dealt with through other measures, and would be so severe as to outweigh the benefits to the wider community of retaining the facility.*

Mapledurham Playing Field has a pavilion which is the only community inclusion hub in the entire area west of the A4074 in Caversham. Loss of this facility would mean that there is nowhere in the vicinity for local groups of all ages to hold clubs such as Bridge, Scrabble, Scouts, Guides, Playgroups, Toddler Groups, Farmers Market, Fund Raising and many other events which cannot be held in other venues, such as school halls, due to the limitations of use during school hours. These include pre-school and after school clubs, all of which limit the use of such facilities to the point they cannot fulfil the needs of the local community groups.

#### NEED FOR A SCHOOL QUESTIONABLE

Proposals to build a primary school should not take precedent over the protection of public green open space, which is in short supply across Reading Borough, and especially trust land which RBC do not own.

An important point to note is that the business case to build a school on MPF was predicated on a childbirth forecast produced between 2009 to 2015. There has been no update of primary school place forecasts since the report which was submitted to the ESFA by parents in 16 April'12. Data now available from the Office of National Statistics, produced 6 years later, shows a marked decline in birth rates between 2009 and 2015, which has dropped by 84. This means that effectively 84 less Primary school places in Caversham will be needed by 2020. This eliminates the long term need for additional primary school places north of the River Thames as the number of new children could be easily accommodated in the existing primary schools in the area.

If primary school places in Caversham are needed, these can be addressed by a number of other solutions available to RBC which will address provision of education in the area without the need to sell off trust land and lose green public open space. An officer from RBC for education talked about contingency plans which exist and could be implemented with immediate effect. The best option probably being to invest in expanding existing primary schools and protecting the open space at MPF through a volunteer run enhancement scheme.

#### SUMMARY

I am aware that representations made at this stage will feed directly into the public examination of the Local Plan, which is expected to take place during Spring/Summer 2018, and appreciate that such representations at this stage will be provided to the independent Inspector appointed to examine the plan as evidence, and will therefore need to be published on the Council's website.

I welcome my representations being published and would further welcome the opportunity to attend that meeting and voice an opinion with regards to the importance of the Local Plan being upheld.

If the current, existing Local Plan had been strictly adhered to with regards to MPF, residents would not now have been suffering 4 years of anxiety and stress, never knowing whether RBC will ignore that Plan by overriding its own mandate to protect public green open spaces and especially MPF, in order to allow a school to be built. This is despite the need for the school to be highly questionable and the fact that the entire site should be protected for perpetuity by the Recreation Ground Charity 304328 trust.

On this basis alone, it is questionable as to whether the Local Plan is a) legally compliant, b) sound, c) fulfils the duty to co-operate, as it is currently failing on all three counts. For the Local Plan to be effective, it must be robust and, importantly, be upheld in every respect by RBC throughout the duration of its life expectancy.



I would appreciate an acknowledgment of receipt of my representations and will await your instructions in due course with regards to being invited to present them to the independent Inspector as required.

I have also taken the liberty of copying this email to Richard Eatough as he is the Head of Planning with responsibilities for the ESFA proposals and I feel it important that he should see these representations for awareness.

Yours faithfully

Mr Martin Brommell

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BROWN, SARA

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**From:** Francis Brown  
**Sent:** 26 January 2018 13:24  
**To:** Planning Policy  
**Subject:** Fw: Local Plan Section EN7N Item EN7Nn,

**This is an EXTERNAL EMAIL. STOP. THINK before you CLICK links or OPEN attachments.**

Sara Brown,

#### Questions

1. Why is the current Local Plan being ignored in favour of RBC supporting the ESFA's proposals to build a school on Mapledurham Playing Fields, which is designated green open space and held in trust exclusively for recreation?
2. How will the new Local Plan be strengthened to overcome future threats to green open space, especially when it is held in trust?
3. In particular how will it safeguard against the following factors, which cannot be mitigated and will significantly impact Mapledurham Playing Fields, if the EFSA proposal is implemented:
  - a. Traffic movements
  - b. Air pollution
  - c. Noise pollution
  - d. Visual dominance and overbearing on the area of the site where they propose to build
  - e. Privacy and overlooking
  - f. Out of character with local residential properties
  - g. Light pollution
  - h. Impact to other users i.e. tennis club, dog walkers, footballers, casual visitors
  - i. Hours of operation
  - j. Reduction to the quality of the environment
4. What plans are there to demonstrate commitment to the current Local Plan and protect Mapledurham Playing Fields from the threat of the EFSA proposal?

Yours faithfully  
Sara Brown

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BUREAU, LUCY

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**From:** Lucy Bureau  
**Sent:** 25 January 2018 14:34  
**To:** Planning Policy  
**Subject:** REF: Local Plan Section EN7N Item EN7Nn

**This is an EXTERNAL EMAIL. STOP. THINK before you CLICK links or OPEN attachments.**

Dear Sir

I have some questions with regards to the draft Local Plan Section EN7N Item EN7Nn:-

1. Why is the current Local Plan being ignored in favour of RBC supporting the ESFA's proposals to build a school on Mapledurham Playing Fields, which is designated green open space and held in trust exclusively for recreation?
2. How will the new Local Plan be strengthened to overcome future threats to green open space, especially when it is held in trust?
3. In particular how will it safeguard against the following factors, which cannot be mitigated and will significantly impact Mapledurham Playing Fields, if the EFSA proposal is implemented:
  - a. Traffic movements
  - b. Air pollution
  - c. Noise pollution
  - d. Visual dominance and overbearing on the area of the site where they propose to build
  - e. Privacy and overlooking
  - f. Out of character with local residential properties
  - g. Light pollution
  - h. Impact to other users i.e. tennis club, dog walkers, footballers, casual visitors
  - i. Hours of operation
  - j. Reduction to the quality of the environment
4. What plans are there to demonstrate commitment to the current Local Plan and protect Mapledurham Playing Fields from the threat of the EFSA proposal?

I look forward to your responses,

Kind Regards,

Lucy Bureau  
Caversham Resident

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CALDER, COLIN

Please return by Friday 26<sup>th</sup> January 2018 to: Planning Policy, Civic Offices,  
Bridge Street, Reading, RG1 2LU or email [planningpolicy@reading.gov.uk](mailto:planningpolicy@reading.gov.uk)

**PART A - YOUR DETAILS**

	Personal Details	Agent's Details <i>(if applicable)</i>
Title	Mr	
First Name	Colin	
Last Name	Calder	
Job Title <i>(if applicable)</i>		
Organisation <i>(if applicable)</i>		
Address 1		
Address 2		
Address 3		
Town		
Post Code		
Telephone		
E-mail		

**PART B - YOUR REPRESENTATION** (please use a separate form for each representation)

**B1. To which part of the Local Plan does this representation relate?**

Emmer Green (Page 197 of Pre Submission Draft Plan) & Reading Golf Course (Page 199 - Part Development of Reading Golf Club).

**B2. Do you consider that the Local Plan:** (please tick as appropriate)

Is legally compliant?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Is sound?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
Fulfils the duty to co-operate?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

**B3. Please provide details of why you think the Local Plan, or part of the plan, is or is not legally compliant, sound and/or complies with the duty to co-operate.**

Once again we have a set of proposals which are totally lacking in rounded and coordinated thinking. They are driven only by meeting Government targets and show very little in the way of thinking that takes the thoughts and needs of the current community into consideration.

The area north of the River Thames through Caversham and on into Emmer Green (and beyond) is already the victim of lack of thought, consideration and planning of the services and facilities required for the current community. We have a lack of School capacity, lack of first line medical facilities (Doctors and Dentist Surgeries), lack of transport facilities (Bus Service cut recently!), very poor maintenance and care of roads, pavements and green areas (grass etc) and a road system that is totally unfit for current needs.

More domestic property as is the plan for the Reading Golf Club land is likely to bring at least 200 additional cars, major pressure on local services and will bring road traffic chaos at building stage and after completion. The roads in the area are narrow and, as a result of parked vehicles, are "single track". The damage to local wildlife and an area of natural beauty does not appear to have been considered. This part of Reading already has very little natural space and the proposals currently on the table will destroy a significant part of what we have. The area is a major support to our wildlife.

Reading Golf Club and its Course is over 100 years old. It is part of the heritage and fabric of the community available and used for a number of non golf meetings and gatherings.

I suggest Reading Borough Council takes a closer look at the many empty properties - old office space, empty shop premises and domestic property around the town - before destroying land that contributes to achieving cleaner air and reduced pollution.

*Please continue on another sheet if necessary*



**B4. Please set out the modifications that you think would make the Local Plan, or part of the plan, legally compliant and/or sound. Please provide specific wording where possible.**

Provide proof that ALL the requirements of the community are being properly considered in planning matters.

*Please continue on another sheet if necessary*

**B5. If you are seeking a modification to the plan, do you wish to appear in person at the public examination?**

Yes  No

**B6. If you wish to appear in person, please briefly outline why you consider this necessary.**

**B7. Do you wish to be kept informed of planning policy matters?**

(please tick as appropriate)

Please keep me informed of the progress of this Local Plan:

Please keep me informed of all planning policy matters:

CAMPBELL, IAN

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**From:** Ian Campbell  
**Sent:** 11 January 2018 09:16  
**To:** Planning Policy  
**Subject:** PRE-SUBMISSION Draft READING LOCAL PLAN, Nov. 2017: SUBMISSION by Ian Campbell

This is an EXTERNAL EMAIL. STOP. THINK before you CLICK links or OPEN attachments.

TO PLANNING POLICY, READING BOROUGH COUNCIL

FROM IAN CAMPBELL

#### A. ACKNOWLEDGEMENT & SUMMARY

1. Thank you for the invitation to make comments upon the Pre-Submission draft Reading Local Plan. These are below. They follow comments made in previous consultations sent on the 19 January 2016; 16 February 2016; and 11 June 2017 and the Council's responses.

2. Once more I say why in my opinion the council's housing policies over many years significantly increases the cost of accommodation for local residents, and will continue to do so. This outcome, a major policy catastrophe, can only be avoided with a radical change in direction.

3. I say your draft local plan policies appear blind to the cost to young people of restraint based housing land policies. In my opinion you repeat the historic, widespread error shared by many other councils, of allowing defective process (despite the fact that the government February 2017 White Paper recognition that the system is broken) to block widely held wishes at all levels for a deliverable solution to the housing crisis: simply one which will eventually makes homes at all levels affordable once more.

3A. Finally I suggest a solution is in the hands of Reading Council and put forward an initiative Reading Council can, on its own, take.

#### B. KEY DIFFERENCES : Do restrictions on new housing supply forces up house prices and rents?

4. Twice in your responses you reject my argument that high house prices are the fault of Reading's housing policies over many years. I continue to think you are wrong. The error is a fundamental defect in the new draft Local Plan. It invalidates many of the other basic assumptions in the new draft.

4A. You also say 'The Local Plan does not set out to return house prices to 'normal' levels'. Is this not precisely what the government eventually wants to achieve? Why do you not respond with realistic land supply proposals to deliver this result?

4B. WHO CONTROLS HOUSE PRICES? You also refute my comment, that I seem to imply that this (house prices) is wholly within the ability of councils to control, saying that 'It is not'. Again, I do not agree with you. As local councils have total control of the amount, location and timing of the supply of building land, which is the key ingredient needed to build new homes, local councils do have total control of new housing supply. With due respect it is the Council

who is wrong. It is a profound error. It shows a lack of understanding of power of the local plan to create or prevent local levels of affordability.

4C. You do not explain why you think housing supply is not subject to the basic economic rules of supply and demand that apply to all other goods and services. You do not accept policies to restrict the supply of new housing will not force up house prices. Your rejection, although common amongst some councils, causes misgoverning and is contrary to widely held expert opinion.

4D. PROCESS OR PROGRESS? Your approach is excused by suggestions that you have no other choice. If this is the council's belief, it is abdication of Council responsibility. You seek to place process in the way of progress, by saying the Local Plan is not the right place for this issue to be resolved. This explanation is unconvincing. It is a bunker like attitude that stops sound policy making. It is now wrong, because it conflicts with government policy intended to significantly increase the supply of new homes. It is also plainly not in the best interests of the residents of Reading who will carry an accommodation cost burden that wiser housing policies would remove.

5. Here are three facts which show your view on this important point is not accurate.

ONE House price/salary ratios are now about 12:1. Twenty five to thirty years ago the ratio was less than 3:1. About this time and earlier was when local council land supply policies intended to protect Berkshire's open countryside began to reduce the supply of new housing. For social reasons demand was increasing, but supply was reducing, so forcing house prices upwards.

TWO The impact of severe restraints on new housing supply were pointed out at the time and ignored. These misguided control attitudes and their consequences on housing prices were clear long ago. They are now stark in the harsh evidence of unaffordability.

"Under provision of housing and a growing rate of household formation will result in labour shortages and a rapid increase in housing prices. These impose a penalty on wage earners, whose net disposable income will be reduced as a growing percentage of their family budget is allocated to increasingly expensive accommodation. Good news for existing home owners, whose equity will increase, but rough justice for the next generation of home buyers and the socially disadvantaged, unable to compete in the market place".  
( Campbell Gordon, Prosperity at Risk, June 1992)

THREE In July 2002 Prof. Alan Evans, at the time Professor of Environmental Economics and Pro Vice-Chancellor at The University of Reading in evidence to the House of Commons Select Committee on Transport, Local Government and the Regions said

SELECT COMMITTEE EVIDENCE " As a result of the constraints on the availability of land for development which began to bite in the early 1960's the price of land and the price of housing began to rise, a trend which has continued to the present. The increase has been most evident in southern England..... ( para. 2.1); .....for a long time it was denied by the planning profession that restrictions on the supply of land could and would affect house prices. After due consideration, and the employment of consultants to review the evidence, the then DoE came down (rightly) on the side of the economists and accepted that physical planning policies of constraint could and would, if the demand for land and housing increased, have the effect of increasing the price of developable land and housing above what it otherwise would be. (para. 2.3); .....The argument set out above demonstrates that policies of successive governments have had the effect of making housing more expensive. This may not have been their deliberate intention, but it was an inevitable consequence of the stated policy of constraining the availability of land. Once this is recognised it raises a question as to what the

term affordable means. This policy has meant that each successive generation has to live in less housing that their parents could afford at the same stage in life. Thus housing is being made less affordable in order to preserve green field sites. (Para. 3.1). As well as an intergenerational effect there is also a sectoral effect. Private sector firms are usually more able to respond to changes in local labour market conditions. (Para. 3.2). There is also a differential effect with respect to housing. Those who own their own homes benefit from rising house prices. . . . . although their homes have become more valuable very few react to this by selling up and moving. Because of this inertia a policy of restraint is very slow to reduce demand. This wealth effect is also a reason why a policy of restraint is politically popular. On the other hand, for those who rent, increasing house prices means higher rents and they are made worse off. (Para. 3.3).

( Memorandum by Prof. Alan Evans (AFH 24);

<https://publications.parliament.co.uk/pa/cm200102/cmselect/cmtlgr/809/809m25.htm>

6. For Reading Council to maintain, as you do in this new draft Local Plan that the Council's draft housing policies will not continue to make new homes more and more unaffordable and perpetuate failed supply policies which are in conflict with government announcements reveals a worrying lack of understanding the best interests of Reading's future residents.

C. A SECOND DIFFERENCE : Can a Sustainable Solution be found?

7. Besides increasing the future supply of new homes, Reading Council must take the lead in helping to find new sites for housing on a major scale within its travel to work area if its Local Plan is to be sustainable. Failure to pursue a housing policy which will eventually return prices to affordable levels means this draft Local Plan must be deemed by the Government inspector to be not sound.

7A WELCOME PROGRESS Some welcome strategic progress is apparent when this Pre-Submission draft is compared with first draft published late in 2015. The council is seeking to fulfil its Duty to Cooperate with some, but not all of its neighbouring councils through its participation and support for the West Berkshire Strategic Plan. This initiative is based on new, more farsighted thinking and therefore a welcome start to forward planning. But it is a curates egg, good and bad in different parts. The Foreword is encouraging. The content is weak, and shows limited understanding of the need for council policy to set the agenda and to lead the market. Instead once again it follows market operations. To protect Berkshire's and the Thames Valley's pleasant land in the decades ahead this policy, which is re-active not pro-active, will again fail, with the usual negative outcomes.

7B. Recognition by four authorities of the need to work together is a welcome first step. So too are commitments to a strategic approach, and pursuit of land value capture for the community.

7C. On the other hand the WBSB contains no long term vision. Once again, what happens after 2036? Will that date be followed by another cycle of suburbia tacked onto the south edge of Reading?

7D. The WBSB has a second weakness. The area captured by the four councils reflects the SHMA approach. It does not reflect Reading's travel to work catchment area which is much larger and economically relevant.

7D. WBSB FAILINGS Third and critically, the WBSB initiative also contains a major spatial error. Seen as an easy quick-fix and superficially appealing solution, much of the new build needed on open land solution is solely dependant upon an opportunistic commercial initiative by a consortium of land owners and builders to build on a site of their, not the councils, choice. Reliance on developers leadership is an disappointing abdication of responsibility by the

councils involved. Called the Grazeley project for 15,000 new homes the selection of this site is not the result of a rational sequential approach to site identification exercise assessing all the other sites which may be equally suitable in the area. Without first obtaining independent verification how do the four councils know Grazeley is the right location? This is not possible without the evidence.

8. In my submission June 2017 I describe a rational approach for site finding which you have published with your responses online. This step by step approach sets out the methodology to identify big sites for large scale new home building in the Thames Valley for two generations ahead. Before decisions are made on specific locations like Grazeley this site options research must be carried out to identify all sustainable, unprotected locations within Reading's travel to work area where large scale development is possible. Until this evidence is available the suitability and capacity of Grazeley and the other open land sites mentioned in the draft cannot be rationally tested against alternatives. This is a major oversight. It must mean this draft is not sound.

8A. Reading is the main economic business centre in the Thames Valley. Its role as a prosperity generator west of London is paramount. It will continue to extend its importance relative to other business centres like Slough, Oxford and Basingstoke to a far greater scale than is generally recognised. Where will these new workers live? For this reason Reading Council with all its neighbours needs a strategic, long term housing supply policy. The WBSP is inadequate. To address this omission I recommend professional advice is obtained by the council and attach below at Appendix A a possible first step which is exclusively within the council's control.

#### D. THE NEED TO RECOGNISE THAT READING AND THE THAMES VALLEY FACES A UNIQUE CHALLENGE

9. Reading is at the heart of an area that locally must support government housing priorities by putting process second, and results first. Central Berkshire and much of the Thames Valley will be the principal host area for future growth in the Home Counties west of London.

9A. OFFICIAL FAILURE After all the government candidly says in the February 2017 white paper the housing market is broken. Put differently, put into Reading Local Plan terms the Thames Valley housing policy supply mechanism contained in previous local council plans over many years have officially failed. The delivery system is broken. Something must be changed. Now is the time. This failure must be faced: it cannot be ducked once more. As Reading on its own cannot solve the crisis the government must offer Reading the necessary support. Announcements by the Prime Minister and Housing Ministers make it clear, if asked, they are willing. Reading Council must now take the first step.

9A. THE HOST LOCATION. Over the next few decades central Berkshire will continue its historic role as a host location. Reading and Central Berkshire will accelerate its host role as the preferred location for major employment and housing growth as other heavily protected areas to the east and west of Reading, and London boroughs located on the west side of the Greater London area are compelled to look elsewhere for overspill locations. For example, South Bucks, Windsor and Maidenhead and most of Surrey County are located in protected policy areas where large scale housing growth cannot take place. Most of their land is greenbelt. But their open land, unless it has ANOB protection as well as greenbelt protection is at risk of development after the current cycle of local plans ends in the 2030's and the search for more building sites starts once again. Their alternative will be to look at unprotected land close by. For example, for some councils in Surrey parts of Berkshire and Hampshire will become target locations for their own overspill needs. Thames Valley councils need to be thinking about these challenges now.

9A. An illustration makes the point. Another Thames Valley council with similar housing supply problems due to lack of development land and strong growth pressures, is surrounded by open land north and south, east and west but all of which is protected by greenbelt policies has identified land well suited to development for its overspill. It has taken a bold, unilateral step.

10. In September 2017 Slough Borough Council published a report they had commissioned from consultants described as the Slough Northern Extension. It proposes an urban extension to Slough to the north beyond Slough's boundaries and into greenbelt land.

11. In the Preface two Slough councillors say a large number of objections were received from local residents who were unable to identify other reasonable options for the additional housing Slough needs. Within the report there is also an Important Covering note from two Chiltern and South Bucks councillors saying their councils do not support Slough's policy for a northern extension onto their land. The lack of local consensus is not ideal, may hinder optimal solutions and suggests the Duty to Cooperate is failing.

12. Because Reading and the Thames Valley growth potential is unique, and because the government's February 2017 white paper candidly recognises the planning system is broken, in the Thames Valley it is time for Reading to take a high profile lead in finding a new comprehensive deliverable solution not only for its own needs, but also the need of those other Thames Valley residents dependant upon Reading for their economic livelihood. Failure to do so seems contrary to explicit aspirations of this government.

GOVERNMENT ASPIRATIONS. "Our broken housing market is one of the greatest barriers to progress in Britain today. Whether buying or renting, the fact is that housing is increasingly unaffordable-particularly for ordinary working class people who are struggling to get by. ....we need to build many more houses, of the type people want to live in, in the places they want to live. To do so requires a comprehensive approach that tackles failure at ever point in the system."

(Foreword by Prime Minister in the February 2017 White Paper, Fixing our broken housing market; DCLG)

"Soaring prices and rising rents caused by a shortage of the right homes in the right places has slammed the door of the housing market in the face of a whole generation."

(Foreword in the same February 2017 White Paper by the Secretary of State for Communities and Local Government.)

13. LOCAL RESISTANCE. Government sentiment is plain. But locally there is a problem looming. Despite these high level Ministerial statements It is clear some councils in the Home Counties intend to resist government pressure for many more new homes. At local community level there will be considerable grass-roots support for such resistance from some local residents. Surrey County's 11 Council leaders say they refuse to even try to meet 'unrealistic and unacceptable housing targets ' which would require 'concreting over greenbelt';(GetSurrey, 13 December 2017). Surrey County has a very big, maybe unique challenge as around 90% of their undeveloped land is classified as greenbelt. What are they to do? One local councillor, Tandridge District Council leader, coun. Martin Fisher says Surrey's 11 council leaders 'do not accept' new government proposals which will see the number of new houses expected to be built across each local authority area in Surrey rise by as much as 40%. If so, where else will these homes go? Into Sussex, where there much of the land is also protected, or Berkshire and Hampshire, each with plenty of unprotected land? There is, so it seems, nowhere else. Rural councils in the Thames Valley with plenty of unprotected land close to strong employment centres like Reading need to think much further ahead. They face far stronger economic pressures than Surrey's dormitory communities. For some councils, it will amount to a reversal

of earlier mind-sets. Initially this will be unwelcome. There are steps to prevail over resistance if site selection is led by the council, not by developers, is transparent and the delivery timescales are sensible.

14. From Reading's perspective, as the Thames Valley employment growth pressures are far greater than Surrey's it seems logical to focus major new housing building in these white land areas in locations which anticipate future hosting based demand arising elsewhere. Locally, long term, national environmental policies can then be upheld in the remaining protected areas whilst the growth is absorbed and put to good advantage for the locality.

#### E. SOLVING THE THAMES VALLEY HOUSING CRISIS. A threat or an opportunity?

15. Why are local leaders intimidated by new housing proposals? Is it because they come under immense pressure from local residents to resist change, who see any local change as threat to the quality of life of existing residents living in the area identified? Disappointing urban design solutions and inadequate infrastructure support for several decades explains why local residents, often with good reason, view new housing projects near them with horror.

16. LOCAL DEMOCRACY In the short term this pressure cannot be, nor should it be resisted. There is no conflict between local democracy and national economic needs if strategic policy making replaces short term horizons. Sudden surprises as unknown development initiatives pop-up are evidence of weak strategic planning at local level. They destroy local trust. Following new long term supply delivery policies, after ten to fifteen years of awareness and plan preparation these negative reactions will tend to disappear. If rational site selection policies are followed and project preparations are accompanied by compensation for those local residents who materially suffer quality of life damage, the remaining opposition will fall to lower levels.

17. Which is why longterm housing supply policies must also include land value capture, or betterment; a concept identified in both the Conservative and Labour 2017 general election manifestos and in the WBSP thinking. Extremely high land development values in the Thames Valley open the door to local councils taking advantage of a new, very large revenue source by collecting most of the uplift in value councils development control policies will release back to their local community. In the short term such a policy will be contentious for existing owners with justification. In the long term, ten to twenty years ahead, this change will be accepted by landowners if accompanied by enhanced compulsory purchase compensation provisions and it is clear from impartial valuation safeguards the value of their asset base is not eroded.

#### F. NEXT STEPS.

18. IS READING SPECIAL? Reading is a special case. Because of its unique accessibility advantages Reading also has a unique challenge, and a rare financial opportunity. Reading can set an example to other councils facing similar difficulties.

18A. It also has a rare planning opportunity. It is not totally surrounded by greenbelt or ANOB like other dynamic growth centres such as Slough, Oxford, and Cambridge.

19. In conjunction with its council neighbours, or unilaterally Reading Council must commission a land options report ( see Appendix A below). This report will add to the council's evidence base and will be available at the examination in public into the Local Plan.

20. EVIDENCE NEEDED. There are several reasons why Reading Council needs to seek evidence on building land options:



~ house prices and rents are too high. A massive increase in supply is needed over two decades to return prices to normal levels. High prices and rents are causing various problems( social, economic, and personal). And due to demand pressures the expectation is the affordability ratios will continue to increase;

~ whilst Reading Borough is interested in the Grazeley initiative, on the existing evidence the council cannot be satisfied all available site options for long term housing growth in the Thames Valley have been tested. Without this additional information it cannot confidently give official support to Grazeley;

~ over the last two years it is now clearer, despite widespread recognition of the need for many more new homes, that levels of resistance to new housing in protected areas in the Home Counties to the west of London is a barrier that cannot be, and ought not to be overcome in the short term;

~ the local housing pressures cannot be solved in a sustainable way in the twenty year cycle of current local plans;

~ suitable new locations for major new house building can only be identified with local support, which means all alternative location options must be examined in an open and transparent manner, with local residents input too;

- a long term housing policy will enable Reading Council, with its neighbours to ensure the quality of life of existing residents is protected whilst new compensation provisions are available for those who incur financial loss, including to their quality of life.

21. With this new evidence of sustainable building locations, if there is a proven need for massive increases in the supply of housing land somewhere in the Thames Valley Reading Council and its neighbours will have a clear understanding about the different spatial options.

22. There seems, from your responses, to be a process barrier. One solution is for Reading Council to take the land supply dilemma direct to the Prime Minister, whose Maidenhead constituency is close to Reading. On the 3 January 2018 significantly she declared it is her personal mission to fix Britain's housing crisis. She said

PRIME MINISTER SAYS. "We are building a Britain that is fit for the future and our message to the next generation is this-getting on-and climbing up-the housing ladder is not just a dream of your parents' past, but a reality for your future". ( Sky News, 3rd January 2018).

22A. Her commitment seems clear. It is encouraging. Your housing policies will not achieve her mission. A different approach is needed. But first, of course, local opposition must be reassured. Without this local support all initiatives will fail. The step by step solution contained in my earlier July 2017 submission that you published last summer will complete the circle and ensure the government's policy can in due course be fulfilled, and with the support of local residents.

## G. NOW IS THE TIME TO PETITION THE GOVERNMENT

23. Reading and it's neighbours have bunker mentality characteristics to the supply land supply deficit. Here is an escape route: an alibi, to compel all concerned to think radically. Such a cross-party local Reading petition might say:

~~~~~

“Reading Borough Council supports announcements by the Prime Minister intended to ensure the next generation’s aspirations for housing are not just a dream.

The Council is also aware of government recognition (February 2017 White Paper) that the current system for delivering new housing is broken. Reading Council agrees.

Based upon evidence obtained , and other evidence including during an exhaustive two year Local Plan consultation programme this Council it is convinced that in the Thames Valley in general, and Reading in particular the planning system cannot achieve the Prime Minister’s mission without a radical change of direction of sub-regional planning policy intended to lead to a dramatic sub-regional increase in housing supply from 2030.

We therefore seek government policy support for the building, over two generations of a new city, similar or larger in size to Milton Keynes or alternatively a major urban extension to the south of Reading in the direction of Basingstoke on ample open land which is not subject to national protection policies.”

~~~~~

24. Why identify Readingstoke? Why use the comparison with Milton Keynes? Yes, Readingstoke is not a new concept. But it identifies large area in the Thames Valley where there is lots of unprotected land, with good access infrastructure already in place (M3; M4; Reading - Basingstoke railway line; and the Elizabeth Line due to open in 2019). The environmental barriers are Burghfield and Aldermarston. They must be managed. In a housing delivery cycle of 15-60+ years these can be viably directed. With medium and higher densities, and enhanced public transport links, most of the new settlement could be accessible with extremely low levels of private car ownership (cp. Freiburg). The eventual size of Readingstoke will be dictated by the market. Around to 200,000 new homes in 60 years will create scope for state of the art masterplanning opportunities. It will also mean the next round of Thames Valley local planning starts from a sustainable foundation in ten or fifteen years time.

\*\*\*\*\*

APPENDIX A Draft letter from Reading Council to spatial consultants

“Dear Sir,

THAMES VALLEY Long Term Sub-Regional Housing Needs and Delivery Options

Your name is recommended to us. We are also approaching other consultants with a view to making an appointment by xxxx.

Reading Borough recently completed an exhaustive two and half year consultation on its draft Local Plan. This plan will go to the Minister shortly for approval. In the consultation process the constraints on this council’s freedom to deliver the future housing needs of this area in a sustainable way have come into sharp focus. So too the necessity to look beyond the plan period (2036) to enable strategic housing policies for one to two generations to emerge.

The council intends to deliver the best accommodation solutions for its residents today and in the future. House prices and rents are at historically high ratios. Our key objective is to find the means over one or two decades to return these affordability ratios to past, long accepted norms prevailing two and three decades ago. Reading Council recognises this affordability problem is due in large part to long established, enduring restrictions on the supply of building land throughout the Thames Valley region. Reading Council now wishes to break a clean break with this historic approach, restraints based approach to housing land supply which has failed. It notes the government too accepts the current system is broken.

Within Reading's travel to work area, the Council is mindful of the intentions behind two Government white papers published in 2017 intended to find ways to address the unaffordability problem. It is not possible for this council, within the constraints of its own Local Plan to solve the housing supply problem in isolation. But the Council wish to identify a long term delivery solution which will meet the local needs of household growth whilst protecting the high quality undeveloped parts of the Thames Valley, maintain national protection policies in long term, and reflecting the spirit of our Duty to Cooperate obligations to the fullest extent.

Reading's and the Thames Valley's economic successes in recent decades have led to acute housing shortages throughout the Home Counties west of London. Affordability ratios are now at all time highs and growing. This trend must be halted. All the same Reading Council is committed to policies to maintaining, encouraging and supporting future economic growth.

Socially there is increasing concern about local levels of homelessness. Such problems can only be overcome by sharply increasing supply of all categories of tenure in a sustainable way. The council have therefore concluded it is time to examine radical steps to increase the supply of new homes of all tenure types within Reading's travel to work area.

Unlike other dynamic economic growth areas in the Home Counties, Reading is surrounded by a mix of protected and unprotected land areas. This mix provides development flexibility. In addition unitary authorities closer to London in east Berkshire have high concentrations of protected land (Windsor and Maidenhead, for example is 83% green belt) or in west Berkshire with large areas of ANOB. It is also foreseen that some part of London's overspill housing supply problem may eventually have to be met in the western Home Counties. Above all, if recent economic growth rates continue we foresee a need after the end of the current plan period in 2036 for a further 100,000 new homes by the mid/late 2050's and 200,000 sixty years ahead.

The most sustainable way forward to provide the homes needed now, and those in the future whilst continuing to protect the local rural environment and protect the quality of life of today's residents may be to pursue local land supply policies which are very different in two aspects: their spatial coverage and their time scale duration.

These two changes, which will have widespread consequences, will enable a range of land and housing supply options to be considered which under the existing spatial and time frameworks are excluded. By looking two generations ahead, to say 2088 for example it becomes possible to divide the whole travel to work search area into two parts: protected areas where long term national protection policies apply and must remain, and the rest. All the rest are unprotected and therefore potential host locations for future housing on a large scale looking far into the future.

In order to reduce future house price pressures in Reading the supply of housing land within Reading travel to work hinterland must therefore be liberated. We recognise government support will be needed. We are confident this initiative reflects government aspirations. To

make the study manageable we suggest a search area defined by four motorways or national roads, the M3; M4; M40 and A34.

Your task, if appointed, will be to advise in accordance with current government policies. First, it is to identify all protected and unprotected land within the search area. Second, it is to put forward site selection guidelines which will enable local councils to identify locations for new settlements or urban extensions on unprotected land, having regard to current and future infrastructure expectations. We are not seeking to identify specific sites but rather the principles needed to define a set of tools to decide optimum site locations in the future. Some general areas will emerge through your analysis with potential advantages and disadvantages in each case, depending upon what assumptions regarding infrastructure on which each will rely resulting in a ranking of the different options. These can be identified.

Please advise us how long this work will take if appointed bearing in mind we will need your report by no later than Easter 2018.

Signed

Reading Borough Council

\*\*\*\*\*

## APPENDIX B Who is Ian Campbell?

In January 2016, ( amended in February 2016), I made representations to Planning Policy, at Reading Borough Council in response to the Reading Local Plan Issues and Options paper.

In April 2016 I sent Berkshire's eight MP's a paper about the unique environmental pressures and opportunities facing the sub-region and the need for a longterm, Thames Valley wide, consensus based solution to the looming housing crisis. One took up my concerns with the housing Minister ( Brandon Lewis) and obtained a substantive reply. The Minister was supportive of a longer term approach in the Thames Valley.

In July 2017 I wrote to Planning Policy at Reading Borough Council with further submissions regarding the Reading Borough Council draft Local Plan published in May 2017, identifying the land supply dilemma, and suggesting a solution.

At other times during the last three years I have written during the relevant public consultation periods to Hart, Bracknell Forest, Windsor and Maidenhead, Wokingham, West Berkshire and South Oxfordshire councils advising on the need for a much wider perspective and a far more longterm approach to their draft local plans.

A longterm, sub-regional and consensus based approach necessary to win local support in popular rural areas was recommended in two DCLG consultations in 2017, and in May 2017 to the Cambridge/Milton Keynes/Oxford corridor initiative by the NIC.

In 2014 I wrote a 10,000 word essay for the Wolfson Economic Prize stating how a new garden city extension to the south of Reading could be visionary, economically viable and popular. Many years earlier in 1990 I published Growth v. Quality of Life, a Thames Valley solution which advocated building an urban extension to the south of Reading. That proposal anticipated a lead time of more than ten years.

Twice over two decades first on behalf of a consortium of land owners, and then investors I advised on two large housing projects, totalling 10,000 residential units.

Earlier in nineteen sixties when responsible for finding and buying residential building land in London and the south for an established house builder I researched and wrote an economic study, Growth Areas in the South East. It identified the Reading, Basingstoke, Bracknell and Farnham square as having by far the greatest growth potential in the South East outside London. For several decades after that I worked as chartered surveyor in Reading and have lived in west London or the Thames Valley for many decades.

SIGNED IAN CAMPBELL DATED 11 January 2018

-----ENDS-----

PS Please send written confirmation of receipt of this submission. Thank you.

Sent from my iPad

## CANAL AND RIVER TRUST

---

**From:** Jane Hennell <Jane.Hennell@canalrivertrust.org.uk>  
**Sent:** 15 January 2018 16:13  
**To:** Planning Policy  
**Subject:** Reading pre- submission local plan

**This is an EXTERNAL EMAIL. STOP. THINK before you CLICK links or OPEN attachments.**

Dear Sir

Thank you for your consultation on the pre-submission version of the Reading local plan. The Canal & River Trust have considered the content of the document and have no further comments to make in this case.

Kind regards

Jane Hennell MRTPI  
Area Planner South

The Canal & River Trust  
The Dock Office  
Commercial Road  
Gloucester  
GL1 2EB

Tel. 07747 897793

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#### **Cadw mewn cysylltiad**

Cofrestrwch i dderbyn e-gylchlythyr Glandŵr Cymru <https://canalrivertrust.org.uk/newsletter>

Cefnogwch ni ar <https://www.facebook.com/canalrivertrust>

Dilynwch ni ar <https://twitter.com/canalrivertrust> ac <https://www.instagram.com/canalrivertrust>

Mae'r e-bost hwn a'i atodiadau ar gyfer defnydd y derbynnydd bwriedig yn unig. Os nad chi yw derbynnydd bwriedig yr e-bost hwn a'i atodiadau, ni ddylech gymryd unrhyw gamau ar sail y cynnwys, ond yn hytrach dylech eu dileu heb eu copïo na'u hanfon ymlaen a rhoi gwybod i'r anfonwr eich bod wedi eu derbyn ar ddamwain. Mae unrhyw farn neu safbwynt a fynegir yn eiddo i'r awdur yn unig ac nid ydynt o reidrydd yn cynrychioli barn a safbwyntiau Glandŵr Cymru.

Mae Glandŵr Cymru yn gwmni cyfyngedig drwy warant a gofrestrwyd yng Nghymru a Lloegr gyda rhif cwmni 7807276 a rhif elusen gofrestrdig 1146792. Swyddfa gofrestrdig: First Floor North, Station House, 500 Elder Gate, Milton Keynes MK9 1BB.

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CHAPMAN, MARK

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**From:** MARK L. CHAPMAN  
**Sent:** 23 January 2018 20:56  
**To:** Planning Policy  
**Subject:** Mapledurham Playing Fields- Local Plan Section EN7N Item EN7Nn

**This is an EXTERNAL EMAIL. STOP. THINK before you CLICK links or OPEN attachments.**

Dear Sir/Madam,

With regard to the above planning item,

How can it be right, proper and possible that RBC is supporting a EDSA plan to build a school on a green space held in trust for exclusive recreational use ? Why is Mapledurham Playing Fields Charitable Trust at odds with its founding principles to preserve a green space purely for recreational and outdoor activities for the enjoyment of all. A decade ago a poll of local residents voted against such a decision to build a school on land held by the Charitable Trust.

Having seen the council fail in its upkeep of the current Pavillion (now closed) over the past decade and its commitment to sport on the grounds (where are the cricket fields and screens that once existed ?), what commitments can possible be made to safeguard the green space in the future ?

No regard has been taken of the effects on local traffic already seriously congested during the rush hour. Tailbacks of traffic trying to enter Reading on St Peter's Hill are often parallel with Highmoor Road. It may take 20 minutes to cross the river. A school on the proposed site will make matters worse.

There seems no end to the development of empty office blocks in Reading and housing projects in Caversham, though the EFSA obviously believes degrading a green space is a cheaper, and therefore more attractive option.

The air quality, the environment (the recent creation of an orchard and unmanaged green areas), the activities of many residents who use the park for sport or for social reasons will be compromised

A current Local Plan exists to safeguard the park. What is your commitment to that plan ? Why is it being rejected against the tenets of a trust that should be campaigning to preserve the environment, not degrade it.

Kind regards

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CHILTERN AND SOUTH BUCKS DISTRICT COUNCILS

Reading Borough Council  
Pre-Submission Draft Local Plan  
November 2017  
Representations Form



Please return by Friday 26<sup>th</sup> January 2018 to: Planning Policy, Civic Offices,  
Bridge Street, Reading, RG1 2LU or email [planningpolicy@reading.gov.uk](mailto:planningpolicy@reading.gov.uk)

**PART A - YOUR DETAILS**

	<b>Personal Details</b>	<b>Agent's Details</b> <i>(if applicable)</i>
<b>Title</b>		<b>Mr</b>
<b>First Name</b>		<b>Graham</b>
<b>Last Name</b>		<b>Winwright</b>
<b>Job Title</b> <i>(if applicable)</i>		<b>Planning Policy Manager</b>
<b>Organisation</b> <i>(if applicable)</i>	<b>Chiltern District Council &amp; South Bucks District Council</b>	<b>Chiltern District Council &amp; South Bucks District Council</b>
<b>Address 1</b>	<b>Chiltern District Council</b>	<b>Chiltern District Council</b>
<b>Address 2</b>	<b>King George V House</b>	<b>King George V House</b>
<b>Address 3</b>		
<b>Town</b>	<b>Amersham</b>	<b>Amersham</b>
<b>Post Code</b>	<b>HP6 5AW</b>	<b>HP6 5AW</b>
<b>Telephone</b>	<b>01494 729000</b>	<b>01494 729000</b>
<b>E-mail</b>	<b>ldf@southbucks.gov.uk</b>	<b>ldf@southbucks.gov.uk</b>

**PART B - YOUR REPRESENTATION** (please use a separate form for each representation)

**B1. To which part of the Local Plan does this representation relate?**

**Section 3: Spatial Strategy**

**B2. Do you consider that the Local Plan:** (please tick as appropriate)

Is legally compliant?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Is sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Fulfils the duty to co-operate?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

**B3. Please provide details of why you think the Local Plan, or part of the plan, is or is not legally compliant, sound and/or complies with the duty to co-operate.**

Chiltern District Council and South Bucks District Council do not consider that the Pre-Submission Draft Reading Borough Local Plan ('the Draft Local Plan') is sound for the following summary reasons:

- **The Draft Local Plan is not sufficiently justified.**
- **The Draft Local Plan is not effective**, Reading Borough Council having failed to engage effectively through joint working on cross-boundary strategic priorities.
- For the above summary reasons, the **Draft Local Plan is not consistent with national policy** as set out in the National Planning Policy Framework (NPPF).

The Chiltern and South Bucks District Councils' representation on soundness concerns the definition of Housing and Economic Market Areas.

This representation should be read in conjunction with the parallel representation by Chiltern and South Bucks District Councils on the Pre-Submission Draft Reading Borough Local Plan compliance with the Duty to Co-operate. This is because failings under the Duty to Co-operate have undermined the soundness of the evidence base of the Draft Local Plan in relation to market geography.

**Definition of Housing and Economic Market Area**

Chiltern and South Bucks District Councils do not consider that the housing and economic market area geography underlying the Reading Draft Local Plan is a sound basis for plan-making for the reasons set out below. These concerns have previously been placed on formal record by Chiltern and South Bucks District Councils in responding to the Reading Borough Local Plan Regulation 18 consultation. Those earlier comments remain relevant.

1. The Chiltern and South Bucks Local Plan evidence base (specifically Housing Market Areas and Functional Economic Market Areas in Buckinghamshire and Surrounding Areas [ORS & Atkins, March 2015] and Housing Market Areas and Functional Economic Market Areas in Buckinghamshire: June 2016 Update [ORS & Atkins, June 2016] available from <http://www.southbucks.gov.uk/planning/localplan2014-2036/evidence>) defines the functional housing market area for the Buckinghamshire authorities and, where relevant, the surrounding areas. This defines South Bucks District as split between two functional housing market areas: partly within a Berkshire-wide Housing Market Area with the six Berkshire authorities and partly within a functional housing market area comprising the rest of Buckinghamshire.
2. The Chiltern and South Bucks evidence base goes on to apply functional housing market areas on a best-fit basis in order to provide a practicable platform for plan-making. This concludes that South Bucks District, on the basis of undertaking a joint local plan with Chiltern District Council, forms part of a best-fit housing market area comprising the four Buckinghamshire districts and that there is a single housing market area comprising the six Berkshire authorities.
3. The Reading Draft Local Plan evidence base (specifically, the Berkshire Strategic Housing Market Assessment by GL Hearn, February 2016) does not define functional housing market areas but defines housing market areas on a best-fit basis in order to provide a platform for plan-making. This best-fit approach is on the basis of local authority districts and not on the basis of local plan areas resulting in Eastern and Western Berkshire housing market areas with the Eastern Berkshire Housing Market Area including the whole of South Bucks District.
4. The best-fit approach of both local plans' evidence bases does not and cannot change the functional housing market areas affecting Buckinghamshire or Berkshire. However, the full functional housing market areas for Eastern Berkshire including South Bucks and for Western Berkshire have not been defined and the evidence provided by G L Hearn demonstrates that there will be a significant degree of functional overlap between them.
5. Chiltern and South Bucks District Councils do not agree with the Berkshire best-fit approach of using district boundaries to define housing market areas as this is not an appropriate way to provide a practicable platform for plan-making given that there is a joint local plan being prepared for Chiltern and South Bucks. The emerging approach to preparation of a joint local plan was shared with G L Hearn and the Berkshire authorities in advance of the formal decision, while the public decision to do so (October 2015) was made some four months before the GL Hearn best-fit approach was finalised and published. The Berkshire best-fit approach to housing market areas is therefore not considered a sound approach by Chiltern and South Bucks Councils.
6. The GL Hearn report is also considered out-of-date as some key base data has changed.
7. Chiltern and South Bucks District Councils do not agree with the decision of the Berkshire authorities to define two best-fit housing market areas as this was not recommended to the Berkshire authorities by GL Hearn and is not supported by the Berkshire authorities' own evidence. The decision to progress based on two housing

market areas was made at a meeting of the Berkshire authority chief executives before the GL Hearn report was finalised and the final GL Hearn report evidence has sought to be presented in a way to seek to justify the Berkshire chief executives' decision. Chiltern and South Bucks District Councils do not consider that the decision to define two Berkshire Housing Market Areas is a sound basis for planning to meet Berkshire's housing needs in the most sustainable way.

8. There are inconsistencies between the housing and economic market geographies in Berkshire. Evidence on the latter (prepared for Berkshire by Nathaniel Lichfield & Partners [2016]) concludes that there are three functional economic areas operating across Berkshire (compared to the two housing market areas) with one of the Districts (the Royal Borough of Windsor & Maidenhead) sitting across two functional economic market areas on a best-fit basis. This supports the case for a single Berkshire-wide functional economic market area.

**B4. Please set out the modifications that you think would make the Local Plan, or part of the plan, legally compliant and/or sound. Please provide specific wording where possible.**

The Reading Borough Draft Local Plan should re-consider the Berkshire housing and economic market geography on functional and best-fit bases taking into account the Buckinghamshire Housing and Economic Development Needs Assessment.

**B5. If you are seeking a modification to the plan, do you wish to appear in person at the public examination?**

Yes



No

**B6. If you wish to appear in person, please briefly outline why you consider this necessary.**

Chiltern District Council and South Bucks District have engaged with Reading Borough Council through the Duty to Co-operate to seek to ensure that the Draft Borough Local Plan meets housing needs and delivers sustainable development consistent with national planning policy. Chiltern and South Bucks District Councils continue to have significant concerns that a fundamental element of the Draft Local Plan evidence base – namely the Berkshire Strategic Housing Market Assessment by GL Hearn – does not provide a sound basis for plan-making.

As Duty to Co-operate authorities, Chiltern District Council and South Bucks District Council can provide a valuable contribution to the Examination.

**B7. Do you wish to be kept informed of planning policy matters?**

Please keep me informed of the progress of this Local Plan:

Please keep me informed of all planning policy matters:



Please return by Friday 26<sup>th</sup> January 2018 to: Planning Policy, Civic Offices,  
 Bridge Street, Reading, RG1 2LU or email [planningpolicy@reading.gov.uk](mailto:planningpolicy@reading.gov.uk)

**PART A - YOUR DETAILS**

	<b>Personal Details</b>	<b>Agent's Details</b> <i>(if applicable)</i>
<b>Title</b>		<b>Mr</b>
<b>First Name</b>		<b>Graham</b>
<b>Last Name</b>		<b>Winwright</b>
<b>Job Title</b> <i>(if applicable)</i>		<b>Planning Policy Manager</b>
<b>Organisation</b> <i>(if applicable)</i>	<b>Chiltern District Council &amp; South Bucks District Council</b>	<b>Chiltern District Council &amp; South Bucks District Council</b>
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<b>Town</b>	<b>Amersham</b>	<b>Amersham</b>
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<b>Telephone</b>	<b>01494 729000</b>	<b>01494 729000</b>
<b>E-mail</b>	<b>ldf@southbucks.gov.uk</b>	<b>ldf@southbucks.gov.uk</b>

**PART B - YOUR REPRESENTATION** (please use a separate form for each representation)

**B1. To which part of the Local Plan does this representation relate?**

**Section 3: Spatial Strategy**

**B2. Do you consider that the Local Plan:** (please tick as appropriate)

Is legally compliant?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Is sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Fulfils the duty to co-operate?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

**B3. Please provide details of why you think the Local Plan, or part of the plan, is or is not legally compliant, sound and/or complies with the duty to co-operate.**

This representation relates to Reading Borough Council's compliance with the Duty to Co-operate as set out in the Localism Act 2011. The Act places a legal duty on local planning authorities to engage constructively, actively and on an on-going basis to maximise the effectiveness of local plan preparation relating to strategic cross-boundary matters. Reading Borough Council's approach to the Duty to Co-operate is set out in the Duty to Co-operate Statement (November 2017) published alongside the Pre-Submission Draft Reading Borough Local Plan (the 'Draft Local Plan'). The view of Chiltern and South Bucks District Councils is that the Duty to Co-operate Statement inadequately addresses Duty to Co-operate issues with South Bucks District Council and Chiltern District Council in respect of the emerging joint Chiltern and South Bucks Local Plan.

This representation should be read in conjunction with the parallel representation by Chiltern and South Bucks District Councils on the soundness of the Pre-Submission Draft Reading Borough Local Plan. This is because failings under the Duty to Co-operate have undermined the soundness of the evidence base of the Draft Local Plan in relation to market geography.

The declared purpose of the Duty to Co-operate Statement is to *'identify and describe Duty to Co-operate actions that have occurred during the preparation of the Local Plan and to demonstrate that the Duty has been complied with'*. The Statement claims to have identified *'any cross-boundary or strategic issues'* and *'describes their consideration with adjoining authorities, specified bodies and other organisations'*.

The Statement fails to meet the Duty to Co-operate requirements of the Localism Act 2011 and the National Planning Policy Framework and the objectives set out in the Borough's Statement in respect of South Bucks and Chiltern for the following reasons.

1. Reading Borough Council has failed to diligently and accurately record a key strategic Duty to Co-operate issue with Chiltern and South Bucks Councils and has failed to indicate why this remains an unresolved matter. The Duty to Co-operate issue is the inappropriate definition of the Berkshire Housing Market Area (HMA) geography and strong functional relationships between local authorities comprising the Eastern and Western Berkshire HMAs. For example:
  - In October 2015 South Bucks District Council commented on Reading Borough Council's Duty to Co-operate Scoping Strategy (September 2015). Those comments drew attention to the conflict between the then emerging HMA commissioned by the Berkshire authorities and the then emerging HMA commissioned by the Buckinghamshire authorities. At that stage the study for Buckinghamshire identified a HMA comprising all six Berkshire authorities plus South Bucks District. The emerging study for Berkshire identified a Western Berkshire HMA (of which Reading forms a part) and an Eastern Berkshire HMA which included South Bucks District.
  - The October 2015 comments also reiterated that South Bucks District Council was considering undertaking a joint local plan with Chiltern District Council and that Reading Borough Council had been consulted on the implications for HMA definition if a joint plan was prepared.
  - On the basis of undertaking a joint local plan with Chiltern District Council, evidence commissioned by the Buckinghamshire authorities confirmed that South Bucks District forms part of a best-fit housing market area comprising the four Buckinghamshire districts and that there is a single housing market area comprising the six Berkshire authorities. A draft consultants' report setting out the evidence was sent to Reading Borough Council and other relevant Duty to Co-operate organisations on 8 October 2015 for comment.
  - As well as failing to comprehensively record the conflicting evidence on housing market geography, the Duty to Co-operate Statement fails to record the fact that South Bucks District Council has never agreed the housing need figures for South Bucks District included in the Eastern Berkshire HMA. Nor does the Statement record the fact that South Bucks District Council has never agreed the functional economic market area (FEMA) geography defined for the six Berkshire authorities and Thames Valley Berkshire LEP.
  - South Bucks District and Chiltern District Council are not listed as 'Relevant Duty to Co-operate Partners' in the table immediately following paragraph 2.3.6 of the Duty to Co-operate Statement despite the fact that South Bucks District is, according to Berkshire's evidence, included in the Eastern Berkshire HMA. Likewise, South Bucks District and Chiltern District Councils are not listed as 'Relevant Duty to Co-operate Partners' in the table immediately following paragraph 2.4.4 of the Duty to Co-operate Statement despite the fact that South Bucks District is included in the East Berkshire FEMA as defined for Berkshire. These are significant omissions, particularly given that Chiltern and South Bucks Districts are identified as 'Relevant Duty to Co-operate Bodies' for the strategic issues of 'Housing needs and provision' and 'Needs

and provision for economic development and town centres' in Appendix 1 of the Statement.

2. Reading Borough Council has to date failed to progress a Memorandum of Understanding (MOU) with Chiltern and South Bucks Councils despite repeated requests to the six Berkshire authorities to do so. The requests date from 2015 when South Bucks District Council was first invited to attend meetings associated with the Berkshire SHMA and FEMA. The requests were never supported by the Berkshire authorities.
3. The Duty to Co-operate Statement includes as Appendix 4 'Objectively Assessed Need for Additional Housing – Memorandum of Understanding between the Berkshire local authorities in the Western Berkshire and Eastern Berks & South Bucks Housing Market Areas, May 2017'. The MOU includes reference to South Bucks' housing need and delivery and to the Duty to Co-operate. Publication of the Statement in November 2017 is the first time the MOU was shared with Chiltern and South Bucks District Councils. Chiltern and South Bucks Councils were not made aware by the Berkshire authorities that the MOU was being prepared, were not invited to participate, were not informed of its existence, were not invited to participate in the evidence based work coming out of the MOU and were not informed which authorities had/had not signed the MOU until the question was posed following publication of the Statement. The exclusion of Chiltern and South Bucks Councils from the process is a fundamental failing under the Duty to Co-operate. On-going disagreements between Chiltern/South Bucks and Berkshire about the Berkshire SHMA is not acceptable justification for Berkshire – including Reading Borough Council – to have excluded Chiltern and South Bucks from the MOU process.
4. The MOU also further undermines the Berkshire evidence base on market geography by confirming that the six Berkshire authorities have agreed to work together to meet full objectively assessed need for housing (paragraph 5.1).
5. The Duty to Co-operate Statement refers (at Section 2.7) to the West of Berkshire Spatial Planning Framework. Chiltern and South Bucks Councils note that Reading Borough Council is likely to have unmet housing needs over its Plan period and that any shortfall will be accommodated elsewhere within the Western Berkshire Housing Market Area based on the West of Berkshire Spatial Planning Framework. The table immediately following paragraph 2.7.4 of the Statement appears to confirm that in arriving at the Framework, the four local authorities comprising the Western Berkshire HMA have not worked with any other Duty to Co-operate partners despite the fact that Appendix 1 of the Statement identifies other Duty to Co-operate bodies that would be relevant, including Slough Borough Council. There is no clear evidence to show a pro-active or on-going Duty to Co-operate approach across administrative boundaries for helping to address a key strategic planning matter and area of common interest, namely boosting significantly the supply of housing to provide for the unmet needs for market and affordable housing originating from Slough consistent with national policy in respect of the Green Belt. Such an approach would also be consistent with the following statement on the Duty to Co-operate' comprising paragraph 5.1 of the May 2017

MOU referred to above: *'The six Berkshire authorities have agreed to work together to ensure that this full objectively assessed need for housing in the Western Berkshire HMA and Eastern Berks and South Bucks HMA will be met in the authorities' forthcoming Local Plan reviews, as far as is consistent with the policies set out in the NPPF'*.

6. Section 2.8 of the Duty to Co-operate Statement refers to a potential growth opportunity outside of the Reading boundary at Grazeley. The scale of the opportunity – up to 15,000 new homes supported by economic development and associated infrastructure – adds to the importance of wider dialogue within the framework of the Duty to Co-operate than the two partners listed in the table immediately following paragraph 2.8.4 (namely Wokingham Borough Council and West Berkshire District Council).

**B4. Please set out the modifications that you think would make the Local Plan, or part of the plan, legally compliant and/or sound. Please provide specific wording where possible.**

Not applicable

**B5. If you are seeking a modification to the plan, do you wish to appear in person at the public examination?**

Yes



No

**B6. If you wish to appear in person, please briefly outline why you consider this necessary.**

Local planning authorities have a Duty to Co-operate on strategic planning issues that cross administrative boundaries. The Duty to Co-operate Statement prepared by Reading Borough Council inadequately addresses Duty to Co-operate issues with South Bucks District Council and Chiltern District Council in respect of the emerging joint Chiltern and South Bucks Local Plan. As Duty to Co-operate authorities, Chiltern District Council and South Bucks District Council can provide a valuable contribution to the Examination.

**B7. Do you wish to be kept informed of planning policy matters?**

Please keep me informed of the progress of this Local Plan:



Please keep me informed of all planning policy matters:

CLARK, NICK AND SUSAN

---

**From:** nicksusan  
**Sent:** 23 January 2018 20:56  
**To:** Planning Policy  
**Subject:** Local Plan Section EN7N Item EN7Nn

**This is an EXTERNAL EMAIL. STOP. THINK before you CLICK links or OPEN attachments.**

Dear Sirs

1. Why is the current Local Plan being ignored in favour of RBC supporting the ESFA's proposals to build a school on Mapledurham Playing Fields, which is designated green open space and held in trust exclusively for recreation?
2. How will the new Local Plan be strengthened to overcome future threats to green open space, especially when it is held in trust?
3. In particular how will it safeguard against the following factors, which cannot be mitigated and will significantly impact Mapledurham Playing Fields, if the EFSA proposal is implemented:
  - a. Traffic movements
  - b. Air pollution
  - c. Noise pollution
  - d. Visual dominance and overbearing on the area of the site where they propose to build
  - e. Privacy and overlooking
  - f. Out of character with local residential properties
  - g. Light pollution
  - h. Impact to other users i.e. tennis club, dog walkers, footballers, casual visitors
  - i. Hours of operation
  - j. Reduction to the quality of the environment
4. What plans are there to demonstrate commitment to the current Local Plan and protect Mapledurham Playing Fields from the threat of the EFSA proposal?

Nick & Susan Clark

Click [here](#) to report this email as spam.

## CLIMATE CHANGE CENTRE READING



Reading Borough Council  
Pre-Submission Draft Local Plan  
November 2017  
Representations Form



**PART A - YOUR DETAILS**

	Personal Details	Agent's Details (if applicable)
Title	Mr	
First Name	Carl	
Last Name	Emerson-Dam	
Job Title (if applicable)	Facilitator - Resilience Action Planning	
Organisation (if applicable)	Climate Change Centre Reading	
Address 1	17 Newbury Close	
Town	Reading	
Post Code	17 Newbury Close	
Telephone	07447 934700	
E-mail	cemersondam@cccrdg.org.uk	

**PART B - YOUR REPRESENTATION**

**B1. To which part of the Local Plan does this representation relate?**

The Local Plan missing a Model Risk-Impact Evaluation Plan, therefore is not legally compliant.

The purpose with this Representation/Objection is via policy innovation and risk/protection impact evaluation, to improve Reading's local urban development practices and planning, to support the British realm and ambitions to become a great global leader in the fight against global warming.

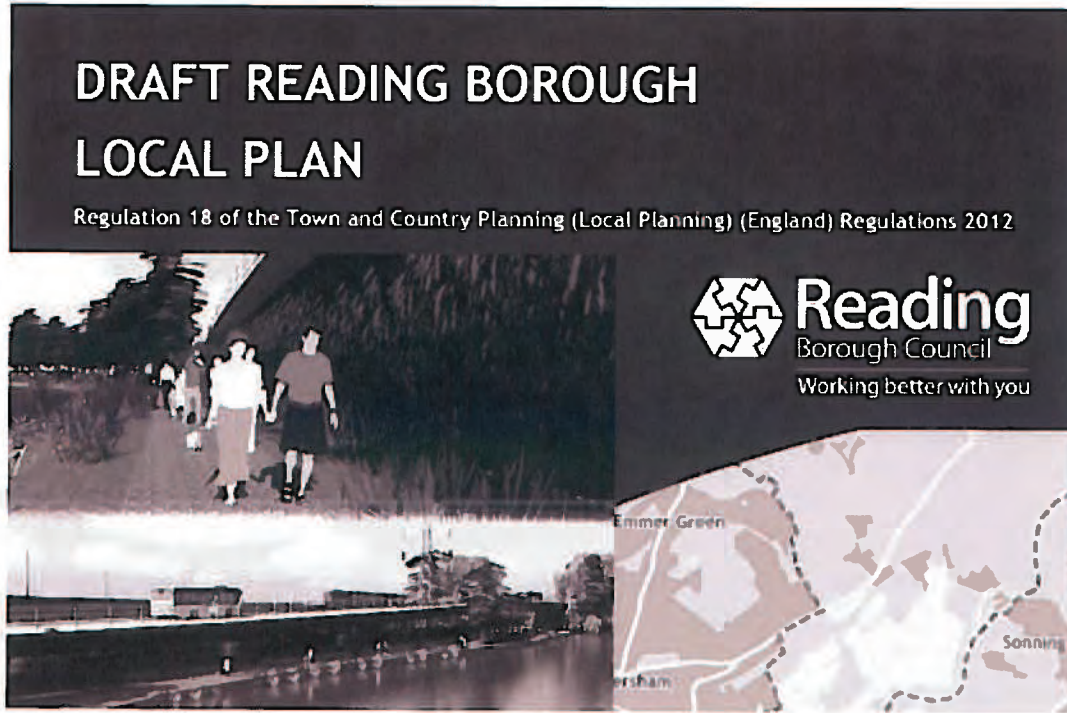
Is legally compliant? - No, Is sound? - No, Fulfils the duty to co-operate? -No

**B2. Are you seeking a modification to the plan, do you wish to appear in person at the public examination? - Yes**

We strongly advise a one-year consultation on risk-impact with Climate Change Centre Reading and that the whole RBC get involved with the Ninth session of the World Urban Forum that will take place from 7 to 13 February 2018 at the Kuala Lumpur Convention Center - <http://wuf9.org> - the only way to secure a safer city in Reading's New Local Plan.

# Is this happening?

A representation from Climate Change Centre Reading  
to RBC Planning Policy Team about the New Local Plan



## From One Page to Ten Pages and Ten proposed changes

To save lives and reduce impact, we have no choice but to reject Reading Borough Council's draft **New Local Plan** setting out how Reading will develop over the next 18 years... for the following reasons: The plan is not adequate or thorough enough to meet immediate and near future requirements for urban development planning; There is no risk evaluation; There is no consideration of the design-life of the new housing stock with regards to our changing climate.

*The key elements of what protects a City in Development is the Health of its Citizens and the Natural Environment. With a Risk/Protection Impact Evaluation, the social/economic effects enter automatically!*

Ecopreneurs for the Climate in Reading Climate Innovation +Jobs Strategy 2.5,  
<https://tvb-climatechallenge.org.uk/wp-content/uploads/2017/12/Eco4ClimRD-Climate-Innovation-Jobs-Strategy-Outcome-Document-12-December-2017.pdf>



**Climate Change Centre Reading, Ecopreneurs for the Climate in Reading**  
**18<sup>th</sup> January 2018 - "Better City - Better Life" ~Shanghai Expo 2010 →**

## Preamble: Reading residents together towards #Reading2026

C40 Cities / Covenant of Mayors (Compact of Mayors) / WRI / ICLEI / Eurocities / UCLG and many more open city organisations have acted since the **Paris Agreement** to advance mitigation objectives [#OnePlanet](#)

- Carbon policy options are available for countries to implement even relatively ambitious mitigation targets
- There is potential for open cities to go beyond their government's Nationally Determined Contributions (NDCs) targets
- Local open governance and institutional arrangements must be significantly innovative for countries to achieve their goals – **Leave No One Behind**
- We “glocally” have an urgent duty to adopt the Sust. Development Goals,  
Goal 13: Take urgent action to combat climate change and its impacts  
Goal 11: Make cities open, inclusive, resilient and sustainable  
Goal 2: End hunger, achieve food security and improved nutrition - Kindly see; <http://www.un.org/sustainabledevelopment/blog/2016/12/city-mayors-strengthen-efforts-to-tackle-climate-change>

### **Shape Reading by 2018**

**The Paris Agreement** was formalised on the 12th December 2015. It has entered force on the 4th November 2016 and is now bound into Law of Treaty. However, it has been said; “England’s planning system is not effectively engaging with current risks and is simply disengaged from its core task of addressing long-term future change. The system remains critically unprepared to deliver both carbon dioxide emissions reduction and the **urban resilience measures** needed to deal with the scale of the climate change impacts anticipated in the UK, as identified by the scientific evidence.” 70% of carbon emission come from cities, this require adequate and open urban governance.”

Reading Borough Council (RBC) needs to fast track actions now towards a 100% sustainable Reading. The plotting System of land and Planning Applications must have mitigation/adaptation (M,A) and ecological consent. All new-build developments should be passive housing in the same area, min. **LEED Gold standard - OBJECTIVE 2020: READING BOROUGH TO COMMIT TO ECOLOGY**

**A. Climate change: Mitigation & Adaptation, L. Integrated Environmental Management**

Complete decarbonisation of the local economy (Zero-Carbon) 2026-50, which is necessary to avoid the gravest climate risks, can only be achieved by profoundly - transforming energy systems and other high-emissions infrastructures. This transformation could inspire **Innovation** and channel **Investment** into sustainability and risk/impact protection, and into the kinds of sustainable **Infrastructure** (accessibility)\* that need to be established and expanded. At the same time, the transformation could combat inequality and promote **Inclusion** within societies and “globally”, thus becoming an equity project. Search the Action Framework for Implementation of the New Urban Agenda (AFINUA) #WUF9



**Ecopreneurs for the Climate in Reading**

12 December 2017 - "Better City - Better Life" ~Shanghai Expo 2010

# New Local Plan 2018-36

Open Governments should ensure all regulations (e.g. building codes, public health regulations) are climate-proofed. Thus, **Reading's New Local Plan** must also do this. The SEPT of Reading Borough Council is trying to fast-track the "New Local Plan" (NLP) by referring to a Sustainability Appraisal of the Pre-Submission Draft Local Plan dated 2014 and to:

**Reading's Climate Change** Strategy (Reading Means Business on Climate Change 2013-2020) and although it says it sets challenging targets for tackling the **Borough's contribution to climate change – THE TARGETS ARE VERY VAGUE!** ☹

4.1.2 The future growth of Reading in terms of the amount of new development taking place has the potential to impose a large environmental footprint in terms of consumption of resources and materials, the use of energy and the associated emission of greenhouse gases that contribute towards climate change. As such, the incorporation of sustainable design and construction techniques are essential to minimise this impact in the context of Reading. Reading's Climate Change Strategy<sup>14</sup> (Reading Means Business on Climate Change 2013-2020) seeks to tackle **the Borough's contribution to climate change by reducing Reading's carbon footprint by 34% by 2020 in comparison to 2005 levels** (Strategy outsourced to Reading Climate Change Partnership (RCCP)). New development has a role to play in achieving these aims.

## Index/Acknowledgements

### 0. Preamble, Reading residents together towards #Reading2026

### 1. Representation/Objection - Urban Resilience p. 1-2

### 2. Planning Rules please p. 3

### 3. Sustainability Objectives (2014) p. 4-5

### 4. The Solution – Change proposed to improve the New Local plan: We recommend making it legally compliant:

The Reading Model Risk-Impact Evaluation Plan (Protection of People and Assets in Berkshire, Oxfordshire, Buckinghamshire) p. 5-7

## N.B.

A Risk/Protection Impact Evaluation MUST be carried out before the launch of the New Local Plan, Not after!! (It can take up to one year)

One year ago, the SEPT was strongly advised to revise and provide adequate resources to plan for urban action adapting to our changing climate. This plan shows climate ignorance without any future ambition or vision.



If non-ambitious climate risk/impact action is taken in response to our representation to Reading's Town Plan, Reading's new urban development agenda (the NLP) will not be legally compliant with the national targets within the Paris Agreement, Climate-Illegal\* etc.

*\*To actively promote the continuing emission of carbon gasses into the atmosphere with full knowledge of the consequences, including the breakdown of the large ice sheets, sea level rise and intensification of extreme weather events such as hurricanes and fires around the world.*

#### **Community Groups Obligations Fulfilled, but Local Political Leadership Lacking**

**Negotiations at the 23rd World Climate Conference outcomes and analysis report:**

**Initial at-a-glance findings show that although COP23 in Bonn fulfilled its diplomatic obligations. Among the key issues addressed at the conference were defining implementation rules for the Paris Agreement, support for countries in the Global South in dealing with the effects of climate change and preparation of the first global review of climate action in time for COP24 in Katowice, Poland.**

**Poor long-term environment decisions are already affecting the Reading people's health. They will continue to will lead to more human suffering if nothing is changed in plan they will bring higher costs to the near future. Two years ago, Change proposed to improve the New Local plan: We advise policy coherence with the New Urban Agenda, <http://nua.unhabitat.org/list1.htm#> a clear change to moving toward a Zero-Carbon Society via some basic acknowledgements.**

**The Reading Climate Change Strategy is out-dated sub-documentation supporting the Strategic Environment, Planning and Transport Committee's (SEPT) draft New Local Plan" are simply illegal acts and needs to be revised.**

*The Town and Country Planning Association said, "The local planning system must deliver the homes and communities that our nation needs, but it must do so within the context of one of the greatest challenges ever to face our society: climate change. It remains unclear whether the United Nations Framework Convention on Climate Change (UNFCCC) Paris Agreement resulting from the 21st session of the Conference of the Parties (COP 21) held in December 2015 can deliver long-term climate stabilisation, but this report highlights that England's planning system is not effectively engaging with current risks and is simply disengaged from its core task of addressing long-term future change. The system remains critically unprepared to deliver both carbon dioxide emissions reduction and the kind of resilience measures needed to deal with the scale of the climate change impacts anticipated in the UK, as identified by the scientific evidence."*

Find evidence here, page 59-61: <https://www.tcpa.org.uk/Handlers/Download.ashx?IDMF=7d92ec4c-09f7-4b21-9d22-b1aad77fd062>

The planning policy team of Reading should not propose a plan for the next 18 years based on inconclusive sub-documentation, out-of-date sustainability appraisals dated 2014 and lack of sustainable urban vision.

**Change proposed to improve the New Local plan: We advise the Sustainability Objectives should be aligned with the 17 Sustainable Development Goals Agenda (2015-30) to support targets in the New Local Plan.**

## **Top economists show that the decline of nature poses severe threats to continued national and global prosperity.**

### **Oxford economists have raised alarm at vanishing wealth of nature**

Ministries of Finance and Treasuries are often blind to how dependent economies are on nature, which is declining at a dangerous rate. As a result, businesses and politicians are failing to register the systemic risk building up as the natural world fails. Read report here <https://www.greeneconomycoalition.org/assets/reports/webWealthofNature.pdf>

**Professor Cameron Hepburn**, who led the research at the University of Oxford's Institute for New Economic Thinking at the Oxford Martin School, says that flawed economic and political institutions are to blame. "Much of the value that economies create is built upon a natural foundation – the air, water, food, energy and raw materials that the planet provides. Without nature, no other value is possible."

It's called *natural capital*, and it's the basis for all human prosperity. But because most economies fail to account for this dependency, "business as usual" is driving a dangerous trend of environmental decline.

# Urban Resilience

## Representation/Objection

Open Governments should ensure all regulations (e.g. building codes, public health regulations) are climate-proofed. Thus, **Reading's New Local Plan must also do this.** The SEPT of Reading Borough Council is trying to fast-track the "New Local Plan" (NLP) by referring to a Sustainability Appraisal of the Pre-Submission Draft Local Plan dated 2014 and to:

**Reading's Climate Change Strategy** (Reading Means Business on Climate Change 2013-2020) and although it says it **sets challenging targets for tackling the Borough's contribution** to climate change – THE TARGETS ARE VERY VAGUE! ☹

4.1.2 The future growth of Reading in terms of the amount of new development taking place has the potential to impose a large environmental footprint in terms of consumption of resources and materials, the use of energy and the associated emission of greenhouse gases that contribute towards climate change. As such, the incorporation of sustainable design and construction techniques are essential to minimise this **impact in the context of Reading.** Reading's Climate Change Strategy<sup>14</sup> (Reading Means Business on Climate Change 2013-2020) seeks to tackle **the Borough's contribution to climate change by reducing Reading's carbon footprint by 34% by 2020 in comparison to 2005 levels** (Strategy outsourced to Reading Climate Change Partnership (RCCP)). New development has a role to play in achieving these aims.

All councillors, planners and developers, in local government policy for implementation, ECOLOGY and restoring the nature are the critical elements to protecting and sustaining development: They should also repeatedly refer to: the only five global binding frameworks that protect and safeguard humans and the planet from our changing climate are:

- The Sendai Framework for Disaster Risk Reduction (DRR) - June 2015
- The Addis Ababa Action Agenda (AAAA) of the agreement Financing for Development A global framework for financing development – July 2015
- The Sustainable Development Goals (SDGs) – September 2015
- The Paris climate agreement (PA) is an agreement within the United Nations Framework Convention on Climate Change (UNFCCC) – December 2015
- The New Urban Agenda (NUA), which will serve as a guideline for sustainable urban development for the next eighteen years – October 2016 <http://nua.unhabitat.org/list1.htm#>

### Out-dated and incomprehensive planning framework and sub-documentation

Therefore, we have to say no to Reading Borough Council's whole New Local Plan, it is based on relying to planning rules and regulations that have not been updated according to national and global development.

### Immediately adopting the five binding framework agendas is the one way to safeguard Reading's New Local Plan (the Supplementary planning documentation)

The planning policy team of Reading should not propose a plan for the next 18 years based on inconclusive sub-documentation, out-of-date sustainability appraisals dated 2014 and lack of sustainable urban vision.

Change proposed to improve the **Reading's Development Control Plan**, See above.

## Referring to current form; Urban Extension Form for site planning approval in the draft New Local Plan, see - Appendix p.8

Is insufficient and not fit for purpose under current legislation. It does not fit with the national plan for the environment.: A Green Future: "Our 25 Year Plan to Improve the Environment"?"

Change proposed to improve the NLP: We recommend these questions added to make the "Urban Extension Form" fit with current legislation.

A Are there concerns the function/policy is legally compliant **with** "Our 25 Year Plan to Improve the Environment"?

B What climate change local-government adaptation outcome/concerns are wanted from this function/policy?

C What risk/impact outcome/concerns are wanted from this function/policy?

D How does this urban extension affect or constitute site destruction on this land in relation to this function/policy?

E Are there concerns that the function/policy does or have a differential impact due to restoring/improving the natural environment?

G **Are there concerns that the function/policy does or have a differential impact due to people's livelihood?**

F Are there concerns that the function/policy does or have a differential impact due to inequality?

...

## Innovation key messages to the Strategic Environment, Planning & Transport Committee (SEPT) of Reading Borough Council

Highlights to Parties (multi-stakeholders and non-state-actors) that the implementation of industrial energy efficiency, including material efficiency, measures in emission-intensive sectors can update the work carried out in 2017, Industrial energy and material efficiency in emission-intensive sectors.

Ecopreneurs for the Climate in Reading wishes to deliver the following key messages,

Innovation (to channel investment into urban resilience and (climate) hazards protection

To achieve the goals of the Paris Agreement, there is a pressing need to accelerate and strengthen technological innovation so that it can deliver environmentally and socially sound, cost-effective and better-performing climate technologies on a larger and more widespread scale. **But there is no 'one size fits all'** approach. Different innovation approaches are needed.

On a local level represent and enhance the implementation of nationally determined contributions (NDCs), National Adaptation Plans (NAPs) and mid-century strategies, Change proposed to improve the NLP: We recommend that the SEPT encourage Parties:

- (a) To prioritize resources (human, institutional and financial) for such innovation efforts, in accordance with their needs, priorities and capacities;
- (b) To enhance public and private partnership in the RD&D of climate technologies by increasing expenditure for it and providing a clear policy signal of a long-term commitment to act on climate change;
- (c) To strengthen open governance systems of innovation and enabling environments, including through market creation and expansion and capacity- building;
- (d) To enhance existing and build new collaborative initiatives for climate technology innovation, including for sharing expertise, good practices and lessons learned;
- (e) To create an inclusive innovation process that involves all key stakeholders, facilitating the incorporation of diverse and relevant expertise, knowledge and views and generating awareness of the benefits and impacts;
- (f) To acknowledge and protect indigenous and local knowledge and technologies and incorporate them in their local and regional innovation systems.

# Planning Rules

Open Governments should ensure all regulations (e.g. building codes, public health regulations) are climate proofed. **Thus, Reading's New Local Plan must also do this.**

## Land use planning

The Planning team / experts needs a wide range of special expertise (ex. land evaluation specialists, economists and sociologists).

The Land users, these are people living in the planning area whose livelihood depends wholly or partly on the public land. The involvement of all land users in planning is essential as they must put the plan into effect and must therefore believe in its potential benefits as well as in their fairness on the planning process

### **The purpose is to select and put into practise those land uses that will best meet the need of the people**

Two conditions must be met if planning is to be useful:

- the need for changes in land use, or action to prevent some unwanted change, must be accepted by the people involved;
- there must be the political will and ability to put the plan into effect.

Comprehensive Planning is a “big picture” look at the community today and where the community envisions future development. It generally includes the community's goal and objectives along with its principles and policies

- Risk-based land use plans must inform all urban infrastructure projects and incorporated in all phases of the urban project's cycle.
- Develop model plans that incorporate risk evaluation, safe construction techniques and building maintenance that integrate maintenance.

In risk-impact assessing and modelling their new local plan, RBC should ask:

- Has a legal framework for effective land use planning been put in place?
- Has a Strong Partnerships Among Community orgs been established?
- Land use planning require a multi-stake holder participation. Can be done through:
- Involving relevant Ministries/Departments, Technical Experts and ensuring Communities Participation
- Establishing a multi-stakeholder committee

Appendixes giving supporting data, Change proposed to improve the NLP: **Reading Town Plan should include open mapping;**

- physical environment, planning units, agro-climate and soil data
- population, settlement, infrastructure, tenure
- present land use
- land-use types and land requirements; land suitability
- economic projections, etc.



# Sustainability Objectives (2014)

RBC has for years failed to address development risk and sound assessment to the impact of (climate) hazards in line with the Sendai Framework, arguing;

“4.1.2 It is not considered that there is any reason to make amendments to the Sustainability Appraisal Framework for the purposes of undertaking this appraisal. The Framework was produced very recently, in 2014, and is therefore reasonably up-to-date. The Local Plan is concerned with strategic issues, and does not have a limited scope that might necessitate amending the Framework. Whilst there may be plans and documents to consider that were published more recently than the Framework, or new information that has become available, these will be highlighted where relevant.”

## 4.1 Sustainability Objectives

4.1.1 The Sustainability Appraisal Framework (found in the 2014 Sustainability Appraisal Scoping Report, Appendix 3) sets out the sustainability objectives against which the effects of the plan will be assessed. The Sustainability Appraisal Framework contains 20 environmental, social and economic objectives, which are set out below. The Framework also lists sub-questions to allow the effects to be considered, and contains baseline indicators and an overall aim for each objective.

<b>Living within Environmental Limits (Environmental Objectives)</b>	
1	To limit the impact of climate change through minimising CO2 emissions and other greenhouse gases.
2	Adapt to inevitable climate change in terms of preparedness for extreme weather events, including avoiding and managing the risk of flooding, heat wave, drought and storm damage.
3	Ensure appropriate, efficient, reliable and careful use and supply of energy, water, minerals, food and other natural resources.
4	Minimise the consumption of, and reduce damage to, undeveloped land.
5	Minimise the generation of waste and promote more sustainable approaches to waste management.
6	Minimise air, water, soil/ ground and noise pollution, and improve existing areas of contaminated land and poor air and water quality.
7	Value, protect and enhance the amount and diversity of wildlife, habitat and geology, and other contributors to natural diversity, including establishing/enhancing ecological networks, including watercourses and surrounding corridors.
8	Avoid contributing towards a likely significant effect, either alone or in combination with other plans and projects that could lead to an adverse effect on the integrity of internationally-designated wildlife sites.
9	Create, enhance and maintain attractive and clean environments including protecting and, where appropriate, enhancing landscape and townscape character.
10	Value, protect and, where possible, enhance the historic environment and the heritage assets therein and the contribution that they make to society and the environment.
<b>Ensuring a Strong, Healthy and Just Society (Social &amp; Economic Objectives)</b>	
11	Protect, promote and improve human health, safety and well-being including through healthy lifestyles.
12	Promote strong and vibrant communities through reduction in crime and the fear of crime and enhanced community cohesion.
13	Ensure high quality housing of a type and cost appropriate to the needs of the area.
14	Reduce the need for travel and transport particularly by car or lorry and facilitate sustainable travel choices.
15	Ensure good physical access for all to essential services and facilities, including healthcare.
16	Avoid significant negative effects on groups or individuals with regard to race, disability, gender reassignment, pregnancy and maternity, religion or belief, sex or sexual orientation.
17	Value, protect and enhance opportunities for all to engage in culture, leisure, and physical and recreational activity, particularly in areas of open space and waterspace.
18	Facilitate sustainable economic growth and regeneration that provides employment opportunities for all and supports a successful, competitive, and balanced local economy that meets the needs of the area.
19	Reduce deprivation and inequality within and between communities.
20	Maximise access for all to the necessary education, skills and knowledge to play a full role in society and support the sustainable growth of the local economy.

## 4.0 FRAMEWORK FOR THE SUSTAINABILITY APPRAISAL, page 12

2.2.2 The 20 Sustainability Objectives for the Local Plan are as follows:

“(3. Improve the quality of life for those living, working, studying in and visiting the Borough, creating inclusive, sustainable communities with good access to employment, open space and water-space, transport, education, services and facilities (such as sustainable water supplies and wastewater treatment, healthcare services, social and community facilities, sport and recreation, etc.) to meet identified needs;”

Open Governance and institutional arrangements must be significantly innovative for local authorities to achieve their targets. We have an urgent duty to adopt the Sustainable Development Goals (the SDGs). They should shape the approach to delivering growth and sustainable development until 2030.

Change proposed to improve the NLP: We recommend the 20 Sustainability Objectives should be aligned with the 17 Sustainable Development Goals Agenda (2015-30) to support targets in the New Local Plan,  
[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/603500/Agenda-2030-Report4.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/603500/Agenda-2030-Report4.pdf)

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# **The Solution - Change proposed to improve the New Local Plan: We recommend making it legally compliant:**

There should be a consultation on risk-impact with Climate Change Centre Reading (protection of People and Assets)

There should be an indication of Reading Model Risk-Impact Evaluation Plan (Berkshire, Oxfordshire, Buckinghamshire) would look like.

Before a development plan can be launched the following questions should be asked,

- Is this strategy developed through inclusive, participatory multi-stakeholder consultation?
- Is participation and coordination of all relevant organizations defined?
- Is the strategic plan reviewed on a regular basis? This is defined as at least once every 5 years or as circumstances change (whichever is sooner). Years since the city strategy was reviewed and/or revised
- What kind of authority does the lead agencies or institutions have?
- Does co-ordination of all relevant pre-event planning and preparation activities in the municipality/city exist, with clarity of roles and accountability across all relevant organizations?
- Etc., etc.

**Urban essential** Effective, inclusive organisational structure to identify necessary processes to Organise understand and act on reducing exposure, it's impact and vulnerability to (climate) hazards.  
**Collaboration** Practical solutions - Single point coordinator

It is very urgent to build risk knowledge of existing capacities and gaps, overlaps and bottlenecks. The New Local plan doesn't have an outline and scope for this. It is therefore insufficient, incomplete and not legally compliant - **The New Local Plan must protect all Reading's livelihoods through Inclusive Leadership.**

## There is a dilemma about housing in Berkshire. We need Resilient Housing.

*Not everyone can live in a house with a door, front garden and a back garden any longer, society is entering in the paradigm of a sharing economy, this might very well include housing. Change proposed to improve the New Local Plan, for consideration with regards to energy, mobility, security, healthcare and community"*

Ecopreneurs for the Climate in Reading with regards to the New Local Plan 2018-36 agree;

That there is needs to be a re-thinking on the national/local housing plan., because this area is in danger of saturation. With Reading and Wokingham not having enough land to fulfil its national housing requirement. It doesn't mean we are against housing, but it can no longer be built at the nationally imposed and standard rate without serious damage to character of the area which has attracted both employers and residents in recent times. Despite this, RBC is having to consider where it can build its allocation of homes if its appeals to central government fail, and to this end it is evaluating all sites put forward. There were a considerable number of possible sites put forward, which is why RBC is having to spend a serious amount of time considering these areas - otherwise, if these sites are simply rejected and then questioned by an inspector, RBC may not be able to defend the decisions from accusations of not looking at all sites equally...

While efforts will be made to develop brown field sites and re-develop Reading town centre, there will be inevitably be greenfield development as well. Planners try to choose sites which have boundaries, like motorways, railways etc., and some sites put forward are unpopular because they could lead to merging of settlements...

## Ecopreneurs for the Climate in Reading fully support Campaign To Protect Rural England

***Government failing to protect England's celebrated landscapes from mass urban development, Cities react***

We strongly advise a one-year consultation on risk-impact with Climate Change Centre Reading and that the whole RBC get involved with the **Ninth session of the World Urban Forum that will take place from 7 to 13 February 2018 at the Kuala Lumpur Convention Center - <http://wuf9.org>** - the only way to safe secure Reading's New Local Plan.

## We are concerned that soon RBC could be the effect of the following:

**EU Environmental principles, which include:**

- (a) the precautionary principle;
- (b) the principle that preventive action should be taken to avert environmental damage;
- (c) the principle that environmental damage should as a priority be rectified at source;
- (d) the polluter pays principle;
- (e) the principle that environmental protection requirements must be integrated into the definition and implementation of policies and activities, with a view to promoting sustainable development.

***\* Reading REbuilding for a better future \****

**Green Infrastructure in cities includes:** greening streets, squares and roadsides; greening roofs and facades save energy, attenuate (trap) rain and storm water, and provide cooling, developing urban agriculture; create urban green corridors; replace impermeable surfaces; natural water filtration; phyto-purification; daylighting urban rivers and restoring embankments, etc. **Blue Infrastructure in cities includes:** river corridors, wetlands and other waterways...

*...leading to carbon neutral districts, an EV charging grid, and enough renewable energy to power the city for five days off-grid. A solar panel microgrid that can power the city for 72 hours in the event of a manmade major incident. A transit-oriented city with streets lights consist of power-saving LEDs and return of 30 percent back to the grid.*

There still is a little time left to make the right decisions and take correct resilient urban measurements. We hope and believe with open governance innovation... one brave cross-party council collaboration would dare to work on an ambitious resilience urban agenda... also working progressively increasing responsibility and duty, well... in the end saving lives & assets.

*It's important an urban development plan has a positive tone on improving the environment not just holding it steady. This include among others more wild flowers, improving forests, rivers and bringing more greenery into people's life. To value, protect and enhance natural diversity is weak and insufficient wording*

*We wish to see wording in the New Local Plan of Reading Borough Council to act as the body to hold all local stakeholders to account and give the environment a voice*

## **\* Reading REbuilding for a better future \***



### **Climate Change Centre Reading**

**18<sup>th</sup> January 2018 - "Better City - Better Life" ~Shanghai Expo 2010 →**

#### **ABOUT US:**

Climate Change Centre Reading looking to unlock Reading's green infrastructure potential – Driving Reading's REsilience bid for the 2019-26 European Green Capital Award. Risk/Protection leadership and advocacy with Climate Change Centre Reading (NGO) aims to create a multilateral partnership between the Reading area and the active companies working it. Our mission is for Reading and its businesses to join forces to reduce its emissions and other environmental risk-impacts of we who live and work in the area, as in Reading over 40% of our carbon output comes from local business. We understand every business is different and must work within its own financial constraints, but the common goal is a clear focus to reduce climate risk-impact, and not by 2050... ASAP!

*The main purpose with this Representation/Objection is via policy innovation and risk/protection impact evaluation improve local urban development practices and planning, to support the British realm and ambitions to become a great global leader in the fight against global warming.*



Appendix: Urban Extension Form for site planning approval in the draft New Local Plan - Sustainability Appraisal of the Presubmission Local Plan 1117.pdf

E.g. Urban Extension: Southeast of Reading Borough, page 924

1. Briefly describe the aims, objectives and purpose of the function/policy The Draft Local Plan omits support for an urban extension at land Southeast of the Borough. The aim is to ensure sustainable economic, environmental and social development.			
2. Who is intended to benefit from the function/policy and in what way? The wider community would benefit from avoiding large scale environmental, economic and social effects, particularly with regard to transport and landscape.			
3. What outcomes are wanted from this function/policy? The outcome would be avoiding negative effects landscape, transport and the environment.			
4. Who are the main stakeholders in relation to the function/policy? Landowner, developer, future neighbours and occupants, infrastructure providers and the wider community			
5. Are there concerns that the function/policy does or could have a differential impact on racial groups?	Y	N	✓
6. What existing evidence (either presumed or otherwise) do you have for this? This is not expected to have a differential impact in relation to race.			
7. Are there concerns that the function/policy does or could have a differential impact due to gender?	Y	N	✓
8. What existing evidence (either presumed or otherwise) do you have for this? This is not expected to have a differential impact in relation to gender.			
9. Are there concerns that the function/policy does or could have a differential impact due to disability?	Y	N	✓
10. What existing evidence (either presumed or otherwise) do you have for this? This is not expected to have a differential impact in relation to disability.			
11. Are there concerns that the function/policy does or could have a differential impact due to sexual orientation?	Y	N	✓
12. What existing evidence (either presumed or otherwise) do you have for this? This is not expected to have a differential impact in relation to sexual orientation.			
13. Are there concerns that the function/policy does or could have a differential impact due to their age?	Y	N	✓
14. What existing evidence (either presumed or otherwise) do you have for this? This is not expected to have a differential impact in relation to age.			
15. Are there concerns that the function/policy does or could have a differential impact due to their religious belief?	Y	N	✓
16. What existing evidence (either presumed or otherwise) do you have for this? This is not expected to have a differential impact in relation to religion.			
17. Based on the answers given in 5-16 is there potential for adverse impact in this function/policy?	Y	N	✓ Please explain No, there is no reason to believe that this will have an adverse effect on any groups due to the matters set out above.
18. Can this adverse impact be justified?	Y	N	Please explain

CONNELL, CAROLINE

---

**From:** caroline connell  
**Sent:** 24 January 2018 11:55  
**To:** Planning Policy  
**Subject:** Draft Local Plan Section EN7N

**This is an EXTERNAL EMAIL. STOP. THINK before you CLICK links or OPEN attachments.**

Draft Local Plan Section EN7N Item EN7Nn

I have the following questions regarding the above plan.

1. Why is the current Local Plan being ignored in favour of RBC supporting the ESFA's proposals to build a school on Mapledurham Playing Fields, which is designated green open space and held in trust exclusively for recreation?
  
2. How will the new Local Plan be strengthened to overcome future threats to green open space, especially when it is held in trust?
  
3. In particular how will it safeguard against the following factors, which cannot be mitigated and will significantly impact Mapledurham Playing Fields, if the EFSA proposal is implemented:
  - a. Traffic movements
  - b. Air pollution
  - c. Noise pollution
  - d. Visual dominance and overbearing on the area of the site where they propose to build
  - e. Privacy and overlooking
  - f. Out of character with local residential properties
  - g. Light pollution
  - h. Impact to other users i.e. tennis club, dog walkers, footballers, casual visitors
  - i. Hours of operation
  - j. Reduction to the quality of the environment

4. What plans are there to demonstrate commitment to the current Local Plan and protect Mapledurham Playing Fields from the threat of the EFSA proposal?

I would appreciate a comprehensive answer to these questions.

Caroline Connell

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CONNELL, JOHN

---

**From:** john connell  
**Sent:** 24 January 2018 13:22  
**To:** Planning Policy  
**Subject:** Questions re: Draft Local Plan Section EN7N

**This is an EXTERNAL EMAIL. STOP. THINK before you CLICK links or OPEN attachments.**

Draft Local Plan Section EN7N Item EN7Nn

I have the following questions regarding the above plan.

1. Why is the current Local Plan being ignored in favour of RBC supporting the ESFA's proposals to build a school on Mapledurham Playing Fields, which is designated green open space and held in trust exclusively for recreation?
  
2. How will the new Local Plan be strengthened to overcome future threats to green open space, especially when it is held in trust?
  
3. In particular how will it safeguard against the following factors, which cannot be mitigated and will significantly impact Mapledurham Playing Fields, if the EFSA proposal is implemented:
  - a. Traffic movements
  - b. Air pollution
  - c. Noise pollution
  - d. Visual dominance and overbearing on the area of the site where they propose to build
  - e. Privacy and overlooking
  - f. Out of character with local residential properties
  - g. Light pollution
  - h. Impact to other users i.e. tennis club, dog walkers, footballers, casual visitors
  - i. Hours of operation
  - j. Reduction to the quality of the environment

4. What plans are there to demonstrate commitment to the current Local Plan and protect Mapledurham Playing Fields from the threat of the EFSA proposal?

I would appreciate a comprehensive answer to these questions.

Kindly acknowledge Receipt of this email.

Thank You  
John Connell

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## CONSERVATION AREA ADVISORY COMMITTEE



Reading Conservation Area Advisory Committee

26 JANUARY 2018

**FAO Planning Policy**

**READING CONSERVATION AREA ADVISORY COMMITTEE - REPRESENTATIONS ON THE NEW LOCAL PLAN**

We set out below three wording changes which we consider are important to the Plan and the reasons why.

**1. EN1 PROTECTION AND ENHANCEMENT OF THE HISTORIC ENVIRONMENT**

After the bullet points listed insert 'identify' where shown below:

*All proposals will be expected to "identify," protect and where possible enhance the significance of heritage assets and their settings...*

Reason: To demonstrate that consideration of the significance and settings of heritage assets impacted by proposals has taken place and that this has been based on adequate information.

**2. EN1 para 4.2.13**

Include an additional sentence:

*"The Design & Access statement should state and justify whether a whether a Heritage Statement is required or not."*

Reason: To ensure that heritage is a formal consideration for all proposals where a Design & Access Statement is required.

**3. EN2 Areas of Archaeological Significance**

'Significance' should be replaced by 'potential' throughout.

Reason: This better captures the requirement here. It also aligns with the key to the Proposals Map which shows "areas of archaeological potential".

We do not wish to appear at the public examination.

Yours Faithfully

Evelyn Williams  
Chair Reading Conservation Area Advisory  
Committee

COOK, T.J.

---

**From:** Tim Cook  
**Sent:** 14 December 2017 08:00  
**To:** Planning Policy; Hacker, Sarah (Councillor); Khan, Gul (Councillor)  
**Subject:** Future Development Plan

**This is an EXTERNAL EMAIL. STOP. THINK before you CLICK links or OPEN attachments.**

Dear Sir/Madam

I would like to ask why there is not significant sections on the following areas, below

<http://www.reading.gov.uk/newlocalplan>

At the moment too much emphasis is on planning and road development, but this doesn't take into consideration "How People Live", as this important aspect of health of the community

Youth Development in the Area within different age bands  
Sports, Health and Recreation  
Elderly Development in the Area - consider people over the age of 65  
Reading Parks, Rivers and Green Areas including wildlife  
Business co-operation/sponsorship with local councils reducing costs  
Energy production in the area - self-sufficiency working with local Power Suppliers  
Reading/Berkshire Development Bank for small and Medium Enterprises

I feel if the planning for a significant period on the future these area need their own section shouldn't be wrapped in one small section of recreation in the plan

Regards,

Mr. Cook

*The sender has requested a read receipt. If you do not wish to provide one, [click here](#).*

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COTTEE, JENNY



Reading Borough Council  
Pre-Submission Draft Local Plan  
November 2017  
Representations Form



Please return by Friday 26<sup>th</sup> January 2018 to: Planning Policy, Civic Offices, Bridge Street, Reading, RG1 2LU or email [planningpolicy@reading.gov.uk](mailto:planningpolicy@reading.gov.uk)

**PART A - YOUR DETAILS**

**Personal Details**

**Agent's Details** *(if applicable)*

<b>Title</b>	Mrs	
<b>First Name</b>	Jennifer	
<b>Last Name</b>	Cottee	
<b>Job Title</b> <i>(if applicable)</i>		
<b>Organisation</b> <i>(if applicable)</i>		
<b>Address 1</b>		
<b>Address 2</b>		
<b>Address 3</b>		
<b>Town</b>		
<b>Post Code</b>		
<b>Telephone</b>		
<b>E-mail</b>		

**PART B - YOUR REPRESENTATION** (please use a separate form for each representation)

**B1. To which part of the Local Plan does this representation relate?**

WR2 Park Lane Primary School, The Laurels, and Downing Road

**B2. Do you consider that the Local Plan:** (please tick as appropriate)

Is legally compliant?

Yes  **yes**

No

Is sound?

Yes

No  **no**

Fulfils the duty to co-operate?

Yes

No

**B3. Please provide details of why you think the Local Plan, or part of the plan, is or is not legally compliant, sound and/or complies with the duty to co-operate.**

The section does not mention a very significant matter: the number of Early Years School places on the site. It appears that implementing the unaltered plan would result in the total number of Early Years places being very significantly reduced. This matter has not been the subject of any public consultation. It is this avoidance of a difficult issue that renders this section unsound.

It appears that the much-needed places currently provided in both schools (Blagrove Nursery School and Park Lane Primary School) that will be accommodated within the scheme, not elsewhere in the vicinity. There has been no mention of the retention of Early Years places; the matter of re-provisioning the number of Early Years places has not been addressed in publicly available documents.

*Please continue on another sheet if necessary*

**B4. Please set out the modifications that you think would make the Local Plan, or part of the plan, legally compliant and/or sound. Please provide specific wording where possible.**

Include in 7.3.4 after car parking and associated facilities, insert include replacement Early Years school provision, replacement library, health clinic.

Include in 7.3.6 the following new sentence after the first one. *The replacement Early Years provision within the new scheme will match that currently provided by the two schools (Blagrove Nursery and Park Lane Primary)*

*Please continue on another sheet if necessary*

**B5. If you are seeking a modification to the plan, do you wish to appear in person at the public examination?**

Yes

yes

No

**B6. If you wish to appear in person, please briefly outline why you consider this necessary.**

The matter has not been raised in any of the many consultation documents over the years. Blgrave Nursery school, although in 'temporary' accommodation has been an important community asset for decades . It's influence to local well-being stretched beyond the youngsters directly catered for. Latterly the influence was achieved through 'Sure Start'. Previously many less formal methods were successful in supporting families. I have no knowledge of the Early Years provision at Park Lane Primary School, but believe the issue of the possibility of loss of quality local Early Years provision needs attention.

**B7. Do you wish to be kept informed of planning policy matters?** (please tick as appropriate)

Please keep me informed of the progress of this Local Plan:

yes

Please keep me informed of all planning policy matters:

yes

Reading Borough Council  
Pre-Submission Draft Local Plan  
November 2017  
Representations Form



Please return by Friday 26<sup>th</sup> January 2018 to: Planning Policy, Civic Offices,  
Bridge Street, Reading, RG1 2LU or email [planningpolicy@reading.gov.uk](mailto:planningpolicy@reading.gov.uk)

**PART A - YOUR DETAILS**

	Personal Details	Agent's Details <i>(if applicable)</i>
<b>Title</b>	Mrs	
<b>First Name</b>	Jennifer	
<b>Last Name</b>	Cottee	
<b>Job Title</b> <i>(if applicable)</i>		
<b>Organisation</b> <i>(if applicable)</i>		
<b>Address 1</b>		
<b>Address 2</b>		
<b>Address 3</b>		
<b>Town</b>		
<b>Post Code</b>		
<b>Telephone</b>		
<b>E-mail</b>		

**PART B - YOUR REPRESENTATION** (please use a separate form for each representation)

**B1. To which part of the Local Plan does this representation relate?**

**WR3s- The land at Kentwood Hill.**

**B2. Do you consider that the Local Plan:** (please tick as appropriate)

Is legally compliant?

Yes

y

No

Is sound?

Yes

y

No

Fulfils the duty to co-operate?

Yes

No

B3. Please provide details of why you think the Local Plan, or part of the plan, is or is not legally compliant, sound and/or complies with the duty to co-operate.

*The section is sound. Regarding this part of the Local Plan the wording and sense are consistent with other parts of the document eg En5 and EN13 .*

*Please continue on another sheet if necessary*

B4. Please set out the modifications that you think would make the Local Plan, or part of the plan, legally compliant and/or sound. Please provide specific wording where possible.

*None suggested: retain as is.*

*Please continue on another sheet if necessary*

**B5. If you are seeking a modification to the plan, do you wish to appear in person at the public examination?**

Yes

If  
variation is  
considered

No

B6. If you wish to appear in person, please briefly outline why you consider this necessary.

I am reluctantly content with the loss of ex- allotment land to development proposed in the pre-submission draft, believing that some of this land should have been designated for other purposes. However if there were a suggestion to modify the text protecting the views through the site to the Chiltern escarpment etc I would wish to speak .

**B7. Do you wish to be kept informed of planning policy matters?**

(please tick as appropriate)

Please keep me informed of the progress of this Local Plan:

yes

Please keep me informed of all planning policy matters:

yes

COWLING, TONY

---

**From:** Tony Cowling  
**Sent:** 10 January 2018 22:17  
**To:** Planning Policy  
**Subject:** Local plan

This is an EXTERNAL EMAIL. STOP. THINK before you CLICK links or OPEN attachments.

Hello, I have some comments on the local plan,

2.1.3 I would much rather we talked about low energy than low carbon I can explain why and the difference between the two

3.1.5 I strongly object to the colours on the map it is a bit cheeky, using green for proposed development areas and is unusual too, some of the areas identified for future development crazily are in flood alert areas too! That goes against the policy.

Section 4 – why are we using the BREEAM standard instead of a robust low energy standard like for example Passive Haus? Other authorities are adopting the Passive House standard as are the best social housing providers.

I am very happy to hear that Reading is intending to require a better standard of insulation than the minimum required by currently building regulations.

4.1.2 - is 34% a sufficiently good target to set? We will need to be doing an awful lot better than this in order to meet future targets.

It becomes increasingly difficult to make further savings, i.e. initial savings are much easier to make than later ones, therefore we should aim higher earlier.

It actually makes economic sense (Exeter City Council has already shown that it is as cheap to build social housing to the Passive House standard, I am in favour of a robust low energy standard for all new construction and a less exacting one for refurbishment.

CC3 bullet point one is nonsense, and self contradictory, please revisit this. For instance should all buildings have large south facing roofs?

4 EN1 Enhancing conservation areas - this could best be done by having, fewer, smaller better quality ones.

EN3 Whole Street retrofit would be a good way to go with Council led facilitation.

EN14 – trees need to be managed, safe, replaced, generally looked after, the policy should make reference to these aspects.

EN18 SUDS I do not see that these systems can help in times of severe heavy rainfall as they fill up and then offer no further protection.

It is good to have a plan, I would like it to see a plan that is fit for purpose into the future where we will all need to be using a lot less energy.



Tony Cowling, involved in the consultation process and I am a local sustainability consultant.

CUNNINGHAM, VIVIEN

---

**From:** vivien cunningham  
**Sent:** 23 January 2018 18:36  
**To:** Planning Policy  
**Subject:** Fwd: Draft Local Plan

**This is an EXTERNAL EMAIL. STOP. THINK before you CLICK links or OPEN attachments.**

Begin forwarded message:

**From:** vivien cunningham  
**Date:** 23 January 2018 at 18:25:21 GMT  
**To:** [policy@reading.gov.uk](mailto:policy@reading.gov.uk)  
**Subject:** Draft Local Plan/Mapledurham Playing Fields

Dear Sirs,

I write regarding the draft Local Plan Section EN7N item EN7Nn in particular to ask why RBC is ignoring the plan by supporting the ESFA's proposal to build a school on Mapledurham Playing Fields, which is designated green open space in its entirety?

What plans are there to demonstrate commitment to the current Local Plan and to protect Mapledurham Playing Fields?

I am at a loss to understand Reading Borough Council's actions in this matter, it appears that the plan can be ignored whenever RBC feel like it when they primarily should be upholding it. RBC should be safeguarding the environment, not adding to the air/noise pollution, traffic movement in a currently peaceful, green environment.

Vivien Cunningham

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CUSHLEY, JIM

---

**From:** Jim Cushley

**Sent:** 19 February 2018 18:08

**To:** Bell, Alison

**Cc:** Page, Tony (Councillor); Grashoff, Clare (Councillor); Stanford-Beale, Jane (Councillor); Robinson, Simon (Councillor)

**Subject:** Objection to CA1b Reading Golf Club being included in Local Plan as a misleading representation

**This is an EXTERNAL EMAIL. STOP. THINK before you CLICK links or OPEN attachments.**

Dear Alison Bell, Director of Environment and Neighbourhood Services at Reading Borough Council,

(copied to Tony Page, Deputy Council Leader and Lead Councillor for Strategic Environment, Planning & Transport

Jane Stanford-Beale, Simon Robinson and Clare Grashoff)

I wish to object to the development on Reading Golf Course, as described in CA1b in the Local Plan. I would like this site to be removed from the Local Plan before it is submitted to the Secretary of State.

I think the Local Plan is in part unsound, because CA1b is not a true representation of what is planned.

It says that the golf clubhouse will be relocated, and that additional holes will be acquired in South Oxfordshire. None of this is true. Reading Golf Club have told its members that they plan to sell the whole of the golf course for housing, with 300-500 homes on Reading Borough Council land, and 480 homes in South Oxfordshire. Members of the golf club have been told that they will receive a 6 figure sum from the sale of the land, which will be done in a phased way. The golf club have been talking to a planning expert, developers, and South Oxfordshire District Council, and should have informed Reading Borough Council of their plans, which are different from CA1b.

So my objection is that CA1b is incorrect and gives a misleading impression. CA1b refers to 90-130 dwellings. A replacement club house. Replacement holes in South Oxfordshire. It is based on a golf course still existing. The public have looked at this description, and made their comments. But it is a masquerade. It does not say that the plot of land in CA1b is the first phase of a huge development.

The public have rightly objected to the plan, because of lack of infrastructure – roads, no 3<sup>rd</sup> bridge, schools, GP surgeries, etc. Imagine the number of responses if the people of Reading knew that there are discussions about almost 1,000 dwellings on the golf course, not the 90-130 in the Local Plan. But the public were not able to comment because CA1b is not a reflection of what is being proposed. So I think CA1b, Part of Reading Golf Course, should be removed from the Local Plan.

Yours sincerely

Jim Cushley

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DARLOW, PHILIP

---

**From:** Philip Darlow  
**Sent:** 24 January 2018 14:23  
**To:** Planning Policy  
**Subject:** Draft Local Plan

**This is an EXTERNAL EMAIL. STOP. THINK before you CLICK links or OPEN attachments.**

Draft Local Plan Section EN7N item EN7Nn.

Why is the Local Plan being ignored in favour of RBC supporting the ESFA's proposal to build a school on Mapledurham Fields, which is designated open space & held in Trust exclusively for recreation?

How will the New Local Plan be strengthened to overcome future threats to green open space.

In particular how will it safeguard against the following factors, which cannot be mitigated and will significantly impact on MPF if the EFSA proposal is implemented:

1. Traffic movements
2. Increase of provision of sports facilities as local football clubs are having to provide for more teams particularly women's teams.
3. Air Pollution
4. Noise Pollution
5. Extra Parking spaces for the extra number of vehicles using MPF
6. Light Pollution
7. Replacement of wooded area due to the number of trees to be felled to make way for the school
8. Impact on other users.
9. Replacement Pavilion

What Plans are there to demonstrate commitment to the current local plan & protect the Trust from the threat of the EFSA Proposal?

Regards Philip | Darlow

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DAY, STEPHEN

Reading Borough Council  
 Pre-Submission Draft Local Plan  
 November 2017  
 Representations Form



Please return by Friday 26<sup>th</sup> January 2018 to: Planning Policy, Civic Offices,  
 Bridge Street, Reading, RG1 2LU or email [planningpolicy@reading.gov.uk](mailto:planningpolicy@reading.gov.uk)

**PART A - YOUR DETAILS**

	Personal Details	Agent's Details <i>(if applicable)</i>
Title	Mr	
First Name	Stephen	
Last Name	Day	
Job Title <i>(if applicable)</i>		
Organisation <i>(if applicable)</i>		
Address 1		
Address 2		
Address 3		
Town		
Post Code		
Telephone		
E-mail		

**PART B - YOUR REPRESENTATION** (please use a separate form for each representation)

**B1. To which part of the Local Plan does this representation relate?**

Presubmission\_proposals\_map\_1117\_pages\_A-D.pdf

**B2. Do you consider that the Local Plan:** (please tick as appropriate)

Is legally compliant?	Yes	<input type="checkbox" value="yes"/>	No	<input type="checkbox"/>
Is sound?	Yes	<input type="checkbox"/>	No	<input type="checkbox" value="no"/>
Fulfils the duty to co-operate?	Yes	<input type="checkbox" value="yes"/>	No	<input type="checkbox"/>

**B3. Please provide details of why you think the Local Plan, or part of the plan, is or is not legally compliant, sound and/or complies with the duty to co-operate.**

From the map on page A, it appears that part of our garden at the bottom of Kidmore End Road has been designated a "Major Landscape Feature (policy EN13)" and is shown with a black border between our house (number 164) and garden.



We bought the house (and garden) 12 years ago. The area you have shown in blue consists of lawn, trees under a TPO, shrubs and flowers, as can be found in many other gardens. There is no border or delineation between the house and garden. Looking at the map as a whole, I cannot find another example of a resident's garden being designated a "Major Landscape Feature", nor can I understand why a private garden should be so. Therefore, I believe this designation is unsound and would please ask you to revisit your decision.

*Please continue on another sheet if necessary*

**B4. Please set out the modifications that you think would make the Local Plan, or part of the plan, legally compliant and/or sound. Please provide specific wording where possible.**

Based on surrounding properties, I believe our property should look thus:



*Please continue on another sheet if necessary*

**B5. If you are seeking a modification to the plan, do you wish to appear in person at the public examination?**

Yes  No

**B6. If you wish to appear in person, please briefly outline why you consider this necessary.**

**B7. Do you wish to be kept informed of planning policy matters?**  
(please tick as appropriate)

Please keep me informed of the progress of this Local Plan:

Please keep me informed of all planning policy matters:

DUNKLEY, JIM AND DOWNER, SUSIE

---

**From:** Susan Downer  
**Sent:** 24 January 2018 16:54  
**To:** Planning Policy  
**Cc:** jim dunkley  
**Subject:** Reading Borough Local Plan with particular reference to housing development in the Emmer Green area

**This is an EXTERNAL EMAIL. STOP. THINK before you CLICK links or OPEN attachments.**

Dear Sir/Madam,

We find it hard to believe that the building of yet more houses in the Emmer Green area is being considered. I wonder whether the planners have ever:

1. Driven from Emmer Green toward Caversham and Reading during the rush hour.
2. Having eventually reached Caversham experienced the frustration of trying to park in the Waitrose/Iceland car park.
3. Tried to book an appointment in one of the local medical practices.
4. Tried to get a place for their child in the local schools.
5. Have they damaged their tyres on the terrible road surfaces, Tarmac that cannot cope with the sheer weight of traffic.
6. Presumably the new development of 120+ houses at Sonning Common has not escaped their notice, traffic from this development will be using the same roads.
7. Considered that the Thames Valley is already over populated.
8. That if Reading Golf Course at Emmer Green is built upon then the community will lose a green space with many trees which help to keep a healthy environment.
9. The existing infrastructure will not cope with more cars and more people and where is money to be found to provide more services, health, education, transport?

We would appreciate consideration being given to our concerns and perhaps some answers to the above comments.

Yours faithfully,

Jim Dunkley and Susie Downer

Sent from my iPad

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EBERST, ALAN

---

**From:** A.H.& L.C. Eberst  
**Sent:** 23 January 2018 18:20  
**To:** Planning Policy  
**Subject:** Mapledurham Playing Fields

**This is an EXTERNAL EMAIL. STOP. THINK before you CLICK links or OPEN attachments.**

I write with reference to the draft Local Plan Section EN7N Item EN7Nn:

1. Why is the current Local Plan being ignored in favour of RBC supporting the ESFA's proposals to build a school on Mapledurham Playing Fields, which is designated green open space and held in trust exclusively for recreation?
  
2. How will the new Local Plan be strengthened to overcome future threats to green open space, especially when it is held in trust?
  
3. In particular how will it safeguard against the following factors, which cannot be mitigated and will significantly impact Mapledurham Playing Fields, if the EFSA proposal is implemented:
  - a. Traffic movements
  - b. Air pollution
  - c. Noise pollution
  - d. Visual dominance and overbearing on the area of the site where they propose to build
  - e. Privacy and overlooking
  - f. Out of character with local residential properties
  - g. Light pollution
  - h. Impact to other users i.e. tennis club, dog walkers, footballers, casual visitors
  - i. Hours of operation
  - j. Reduction to the quality of the environment
  
4. What plans are there to demonstrate commitment to the current Local Plan and protect Mapledurham Playing Fields from the threat of the EFSA proposal?

--  
Alan Eberst



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EDEN-JONES, SARAH

---

**From:** Sarah Eden-Jones  
**Sent:** 25 January 2018 17:42  
**To:** Planning Policy  
**Subject:** Pre-Submission Draft Local Plan - CA1b

**This is an EXTERNAL EMAIL. STOP. THINK before you CLICK links or OPEN attachments.**

Dear Sirs,

I would like to make comments on CA1: Site for development and change of use in Caversham and Emmer Green and in particular the development of Reading Golf Course, Kidmore Road.

I am grateful for the plan's identification of sensitivities relating to this development and the care that needs to be taken. However I understand that very recently on 23rd January, therefore since the publication of the Pre-Submission Draft Local Plan, there were firm proposals by the Chairman of Reading Golf Course to sell the whole site and re-locate the club elsewhere. This is an entirely different proposition to that in the Plan. I believe, in the light of this, greater restrictions need to be put in the Plan for this site to manage the ambitions of developers.

I would urge the Council to consider very carefully the impact of 700 dwellings - suggested by the golf club and feasible if agreed to by South Oxfordshire - on this piece of land on the surrounding area. Already the schools in the area are at capacity. Even if only half of the suggested dwellings had one child on a conservative estimate that is a whole new school that would be required. This is the same issue for doctors surgeries. Strain would also be put on the water and sewage network. The roads are already at gridlock in this area in the mornings and evenings and there is much congestion with the schools around St Barnabas Road with risks to pedestrians and cyclists.

I believe there is no capacity in terms of the infrastructure of this area for additional housing on this site.

Equally as the plan has identified the Golf course is home to a rich natural habitat for birds, Red Kites especially and other wildlife, plants and ancient woodland. It provides an area of recreation and enjoyment for local people. It greatly improves the quality of life for the significant number of houses which border the site and the children of Emmer Green Primary School whose grounds also border the golf course. Maintaining such a quality of life is an objective of your plan.

While the owners of the Golf Club have little regard for these concerns, leaving with money in their pockets, Reading Borough Council does rightly have a duty for Reading inhabitants to maintain the balance in the built and natural environment. I urge you to keep to this task.

with many thanks,

Sarah Jones

Click [here](#) to report this email as spam.

ELLIS, LIZ

Please return by Friday 26<sup>th</sup> January 2018 to: Planning Policy, Civic Offices,  
 Bridge Street, Reading, RG1 2LU or email [planningpolicy@reading.gov.uk](mailto:planningpolicy@reading.gov.uk)

**PART A - YOUR DETAILS**

	Personal Details	Agent's Details <i>(if applicable)</i>
Title	Mrs	
First Name	Liz	
Last Name	Ellis	
Job Title <i>(if applicable)</i>		
Organisation <i>(if applicable)</i>		
Address 1		
Address 2		
Address 3		
Town		
Post Code		
Telephone		
E-mail		

**PART B - YOUR REPRESENTATION** (please use a separate form for each representation)

**B1. To which part of the Local Plan does this representation relate?**

WR2:PARK LANE PRIMARY SCHOOL, THE LAURELS AND DOWNING ROAD

**B2. Do you consider that the Local Plan:** (please tick as appropriate)

Is legally compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Is sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Fulfils the duty to co-operate?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

**B3. Please provide details of why you think the Local Plan, or part of the plan, is or is not legally compliant, sound and/or complies with the duty to co-operate.**

In the Tilehurst area, there is already little free space.

Tilehurst bounds West Berkshire. The West Berkshire Local Plan proposes allowing the building of a large number of new houses immediately on the border of Tilehurst. These sites are Land to the east of Sulham Hill, Tilehurst - Policy HSA8, Stonehams Farm, Tilehurst (EUA003) - Policy HSA9 and Stonehams Farm, Long Lane, Tilehurst (site reference EUA008). These sites are listed on pages 29 to 34 in the Housing Site Allocations DPD (2006-2026) West Berkshire Council: Adopted May 2017. It is proposed that these sites will provide the delivery of 35, 15 and 60 dwellings respectively. That is a total of 110 of residential housing, which should have an emphasis on family housing. As seen in the West Berkshire Council Local Plan, these sites border West Tilehurst.

In their plans there is no mention of providing any local infrastructure such as schools, doctors, surgeries, pharmacies etc. The implication is that the additional inhabitants of West Berkshire will use those facilities that are currently provided by West Reading, ie Tilehurst.

In addition there appears to have been little or no collaboration between West Berkshire and West Reading to determine how appropriate services and infrastructure should be provided,

The Park Lane School site provides junior schooling in the main for the children of western Tilehurst. It has its own playing field in Downing Road. It must be noted that the playing field is the only bit of open space in this area of Tilehurst that is suitable for playing sports. Once it has gone there will be no other.

Much has been made of the fact that the infant school, The Laurels, is not on the

same site as the junior school, Park Lane School, but in general this is not seen as an impediment to providing a good level of education both in the Infants and Junior Schools.

Now in this version of the local plan, it appears that it is intended to sell off the site of Park Lane School including the Downing Road playing field to provide residential housing (45 to 55 dwellings). The education authorities have for many years attempted to persuade those that will listen that it is expedient to take this course of action for the good of our future.

Although there is a general move to amalgamate infant and junior education into one site and provide one primary level of schooling it is often for financial reasons rather than educational reasons. There is little evidence to show that a primary school on one site provides for a better education.

Section 7.3.5 in the local plan states:

*Park Lane Primary School is a 2 Form Entry (2FE) Primary School. The school currently operates from a split campus across four separate sites. This arrangement provides an unsatisfactory primary education environment.*

However this statement gives no rationale or evidence as to why the current arrangement provides an unsatisfactory primary education environment. The statement is unsubstantiated. And indeed it does not suggest how packing a nursery school, an infant school, a junior school, a library and a health clinic on to a small site - with practically play or sports fields, will benefit our children. Moreover the plan as outlined suggests that the Blagrove nursery will also be incorporated into the Laurels site.

The proposed replacement school on the Laurels site will be a smaller school on a smaller site and will have practically no playing field space. So at a time when there will be a requirement to have a larger school to accommodate the increase in the local population together with that of West Berkshire too (potentially as many as 160 families) the local authority plans to decrease the number of school places and build on the only playing field in this area.

This cannot be sound. In particular The Laurels site cannot possibly provide sufficient room to school all these new children.

When the idea for the redevelopment for the new Laurels school was first mooted it was rejected by many local people. Rightly they thought that the authorities were planning to take Blagrove Recreation ground to be part of the Laurels site. The authorities have no absolute right to do so. That was established after a public inquiry.

In addition, section WR2 of the plan mentions that Tilehurst Library and the Health Clinic are currently on the Laurels Site. There is no mention of how these services will be retained if the plan to move the junior school to the Laurels site is undertaken. It smacks of squashing a large number of necessary services into a very small space with no room for manoeuvre at a later stage when services for an even larger population are required.



The inhabitants of Tilehurst will be very much impoverished if the plan to release Park Lane school site and the Downing Road Playing Field for housing goes ahead.

*Please continue on another sheet if necessary*

**B4. Please set out the modifications that you think would make the Local Plan, or part of the plan, legally compliant and/or sound. Please provide specific wording where possible.**

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Site WR2:PARK LANE PRIMARY SCHOOL, THE LAURELS AND DOWNING ROAD should be removed from the local plan as a site suitable for development for 55 dwellings. It is unsound in that it does not meet development and infrastructure requirements for west Tilehurst, nor does it include providing for any infrastructure required by the neighbouring authority, namely West Berkshire. The rationale has been given in the previous section of my statement.

There will, in the not too distant future, be a requirement for increased numbers of school places. To go ahead with destruction of a perfectly satisfactory primary school for short term gain ie to meet the housing figures, is a nonsense. If the WR2 site is allowed to be developed for dwellings there is no other suitable site in the vicinity to accommodate services and infrastructure.

There is no evidence that any discussions have been undertaken between West Berkshire and West Reading to determine how any of the required infrastructure and services required by the local inhabitants will be provided.

I repeat, this site WR2 should be removed from the local plan.

*Please continue on another sheet if necessary*

**B5. If you are seeking a modification to the plan, do you wish to appear in person at the public examination?**

Yes

No

**B6. If you wish to appear in person, please briefly outline why you consider this necessary.**

**B7. Do you wish to be kept informed of planning policy matters?**

(please tick as appropriate)

Please keep me informed of the progress of this Local Plan:

Please keep me informed of all planning policy matters:

EMMER GREEN RESIDENTS' ASSOCIATION

Reading Borough Council  
 Pre-Submission Draft Local Plan  
 November 2017  
 Representations Form



Please return by Friday 26<sup>th</sup> January 2018 to: Planning Policy, Civic Offices,  
 Bridge Street, Reading, RG1 2LU or email [planningpolicy@reading.gov.uk](mailto:planningpolicy@reading.gov.uk)

**PART A - YOUR DETAILS**

	Personal Details	Agent's Details <i>(if applicable)</i>
Title	Mrs	
First Name	Annette	
Last Name	Fairweather	
Job Title <i>(if applicable)</i>	Chairperson	
Organisation <i>(if applicable)</i>	Emmer Green Residents Association	
Address 1		
Address 2		
Address 3		
Town		
Post Code		
Telephone		
E-mail	egra.contact@gmail.com	

**PART B - YOUR REPRESENTATION** (please use a separate form for each representation)

**B1. To which part of the Local Plan does this representation relate?**

Section 8.3 CA1b Part of Reading Golf Course - Kidmore End Road

**B2. Do you consider that the Local Plan:** (please tick as appropriate)

Is legally compliant?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Is sound?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
Fulfils the duty to co-operate?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

**B3. Please provide details of why you think the Local Plan, or part of the plan, is or is not legally compliant, sound and/or complies with the duty to co-operate.**

There is real concern among the residents in the locality of this planned housing development that it is “unsound” - in that it will not be deliverable in accordance with the Plan’s provisions.

The measures needed to mitigate impacts on the local infrastructure are set out, and it is a general principle of the Plan that developments will provide/contribute towards infrastructure needs. The proposal also identifies other benefits to flow from the scheme - replacement golf holes, replacement club house and on-site public open space.

The fear is that the provision of these benefits and the safeguarding of local infrastructure will be beyond the financial capacity of the development. It has been understood locally that the widening of the nearby section of Kidmore End Road that is effectively single track would in particular be complex and expensive. Widening will be essential if the use of residential roads as rat runs is to be avoided.

*Please continue on another sheet if necessary*

**B4. Please set out the modifications that you think would make the Local Plan, or part of the plan, legally compliant and/or sound. Please provide specific wording where possible.**

If adequate financial capacity is a problem, the local belief is that it will be the funding of local infrastructure will be restricted. A more robust - "sound" - Plan would identify a significantly reduced number of houses for the site. This would be certain to reduce the impact of the local infrastructure whereas the provision of contributions will be uncertain.

*Please continue on another sheet if necessary*

**B5. If you are seeking a modification to the plan, do you wish to appear in person at the public examination?**

Yes  No

**B6. If you wish to appear in person, please briefly outline why you consider this necessary.**

**B7. Do you wish to be kept informed of planning policy matters?**

(please tick as appropriate)

Please keep me informed of the progress of this Local Plan:

Please keep me informed of all planning policy matters:

## ENGLEFIELD ESTATE

Please return by Friday 26<sup>th</sup> January 2018 to: Planning Policy, Civic Offices,  
Bridge Street, Reading, RG1 2LU or email [planningpolicy@reading.gov.uk](mailto:planningpolicy@reading.gov.uk)

**PART A - YOUR DETAILS**

	Personal Details	Agent's Details <i>(if applicable)</i>
Title		Mr
First Name		Phil
Last Name		Brown
Job Title <i>(if applicable)</i>		Director
Organisation <i>(if applicable)</i>	The Englefield Estate	Savills
Address 1		Hawker House
Address 2		Napier Court
Address 3		Napier Road
Town		Reading
Post Code		RG1 8BW
Telephone		0118 952 0506
E-mail		<a href="mailto:pbrown@savills.com">pbrown@savills.com</a>

**PART B - YOUR REPRESENTATION** (please use a separate form for each representation)

**B1. To which part of the Local Plan does this representation relate?**

Spatial Strategy  
Paragraphs 6.1.6, 6.2.1(d), 6.2.10 and 6.3.17  
Policies TR2 and SR4(f)  
Sustainability Appraisal

**B2. Do you consider that the Local Plan:** (please tick as appropriate)



Is legally compliant?

Yes

No

Is sound?

Yes

No

Fulfils the duty to co-operate?

Yes

No

**B3. Please provide details of why you think the Local Plan, or part of the plan, is or is not legally compliant, sound and/or complies with the duty to co-operate.**

See attached letter.

*Please continue on another sheet if necessary*

**B4. Please set out the modifications that you think would make the Local Plan, or part of the plan, legally compliant and/or sound. Please provide specific wording where possible.**

See attached letter.

*Please continue on another sheet if necessary*

**B5. If you are seeking a modification to the plan, do you wish to appear in person at the public examination?**

Yes

No

**B6. If you wish to appear in person, please briefly outline why you consider this necessary.**

If the Inspector wishes to hold any discussions pertaining to land at Grazeley we would be happy to attend if it would assist him/her.

**B7. Do you wish to be kept informed of planning policy matters?**

(please tick as appropriate)

Please keep me informed of the progress of this Local Plan:

Please keep me informed of all planning policy matters:

24<sup>th</sup> January 2018



Planning Policy  
Reading Borough Council  
Civic Offices  
Bridge Street  
Reading  
RG1 2LU

Philip Brown  
E: pbrown@savills.com  
DL: +44 (0) 118 952 0506  
F: +44 (0) 118 952 0501

Ground Floor, Hawker House  
5-6 Napier Court  
Napier Road  
Reading RG1 8BW  
T: +44 (0) 118 952 0500  
savills.com

Dear Sir/Madam,

**Reading Borough Pre-Submission Draft Local Plan Consultation:  
Response of Behalf of the Englefield Estate**

We write on behalf of the Englefield Estate ("The Estate") in response to consultation by Reading Borough Council on the Pre-Submission Draft Local Plan ("the Plan"). Representations have previously been made to earlier stages on consultation on the Plan.

The Estate is located to the south of Reading, within Wokingham Borough and West Berkshire Districts, but adjoining the edge of Reading Borough. Part of the Estate's landholdings lie within an area at Grazeley which has been identified in the Pre-Submission Draft Plan as having potential for strategic development to help meet the needs of the wider housing market area.

***Representations to the Pre-Submission Draft Local Plan***

The Pre-Submission Draft Local Plan recognises that the Berkshire Strategic Housing Market Assessment (SHMA) identifies the Objectively Assessed Housing Need (OAN) for Reading as being 699 homes per year in the period 2013 to 2036. In accordance with the requirements of the National Planning Policy Framework (NPPF), the Reading Borough Council Local Plan must therefore plan to meet this need **in full**, by identifying land for 699 homes per annum as a minimum.

The Council contends that it is unable to meet this requirement in full – the level of housing proposed within the Pre-Submission Draft Plan is only 671 dpa, leaving a shortfall over the Plan period of 644 dwellings. The Council proposes to work with neighbouring Authorities in the Western Housing Market Area (HMA) to provide for this need. This approach is welcomed and helps to meet the Council's requirements under the Duty to Co-operate (as imposed by the Planning and Compulsory Purchase Act 2004).

In order to address this deficit and consider the increased scale of housing across the Western HMA as a whole, Reading Borough, West Berkshire, Bracknell Forest and Wokingham Borough Councils have created the 'West of Berkshire Spatial Planning Framework' as a means of working together to deliver the scale of housing need identified by the SHMA. The Framework recognises that a significant proportion of new development will need to be located on greenfield land and will include sites brought forward collaboratively to deliver the scale of growth required. Land at Grazeley is identified as an 'opportunity area' for a major housing and mixed use development. The identification of land within adjoining authorities and close to the existing

urban area of Reading, is considered to represent the most appropriate response to Reading's inability to meet its needs and to deliver the shortfall. Given this, the Estate's full support is given to the Pre-Submission Draft Local Plan's identification of land at Grazeley as a strategic solution.

**The Estate therefore wishes to express support for the references made within the Draft Plan for development at Grazeley, for example at Policy SR4(f), paragraphs 6.1.6, 6.2.1(d), 6.2.10 and 6.3.17.**

Further, we welcome the references to Grazeley that are made in the 'Spatial Strategy' section (paragraphs 3.1.15 and 3.2.12), as clearly any development of this scale will form a major part of the spatial strategy for the Western Housing Market Area.

We welcome recognition of the potential impacts that development at Grazeley could have on infrastructure requirements for Reading Borough. These are acknowledged in the Plan, including the potential to link to and deliver improvements to sustainable transport modes (such as the new railway station at Grazeley, Park and Ride facilities at Mere oak, and potential Mass Rapid Transit facilities). Support is therefore expressed for the major transport projects identified in Policy TR2 and at Figure 4.8, in particular the south Reading Mass Rapid Transit (MRT) and Mere oak Park and Ride site which would support sustainable development at Grazeley.

In terms of the scale of growth identified at Grazeley, the Draft Local Plan notes the potential capacity of 15,000 dwellings as identified by the West of Berkshire Spatial Planning Framework. It will be important to plan flexibly for growth at Grazeley, because the Berkshire SHMA recognised that (a) the housing needs of the Eastern HMA are materially greater than for the Western HMA (within which Reading, Wokingham and West Berkshire Councils sit); and (b) that the Eastern HMA is significantly more constrained. As such, the opportunities for the Eastern HMA to meet its own needs may be more limited and so the authorities in the Western HMA may need to accommodate "overspill" from the Eastern HMA. It will therefore be necessary to plan flexibly for growth at Grazeley and to 'future proof' infrastructure and services so that the scale of growth accommodates the required housing needs.

**In planning across boundaries for strategic growth to meet the needs of the HMA, the Council is working effectively and planning positively for growth, as required by the 'test of soundness' set out at paragraph 182 of the NPPF. As noted previously, it is also aiming to fulfil its requirements under the Duty to Co-Operate. Growth at Grazeley represents an appropriate strategy to deliver the housing needs of the area, and would further the aim of delivering sustainable development as required by national policy (and, again, would be consistent with the tests of soundness set out in paragraph 182 of the NPPF).**

#### ***Comments on the draft Sustainability Appraisal (SA)***

Appendix 2 of the Sustainability Appraisal tests Policy SA4(f) against the SA objectives (pages 242).

We welcome the assessment of the SA which finds that strategic growth at Grazeley would offer significant sustainability benefits, such as assisting significantly in ensuring high quality housing of a type and cost appropriate to the needs of the area; reducing the need for travel and transport particularly by car or lorry and facilitating sustainable travel choices; and ensuring good physical access for all to essential services and facilities.

**We therefore support the finding of the SA where it concludes that allocation of land at Grazeley would bring the most positive sustainability effects.**

Yours faithfully



**Philip Brown BA (Hons) MRTPI  
Director**

## ENVIRONMENT AGENCY

Mark Worringham  
Reading Borough Council  
Planning Manager  
Civic Centre  
Castle Street  
Reading  
Berkshire  
RG1 7AE

**Our ref:** WA/2006/000005/CS-  
05/SB1-L01  
**Your ref:**  
**Date:** 25 January 2018

Dear Mark

**Reading Borough Local Plan – Pre-Submission Draft Local Plan. November 2017.**

Thank you for your consultation on the above local plan. We are pleased to have worked with you on this local plan and have the following comments to make.

We have written our soundness representations separately in the representation forms. The following comments cover points we are pleased with and support, points of clarity and accuracy and general comments and recommendations where we think the local plan could have been worded to make the policy or supporting text more robust.

**Flood Risk**

Pre-submission Local Plan

Policy EN11: Waterspaces

Paragraph 4.2.48 – We are pleased to see that this supporting text takes into consideration the possibility of opening up and naturalising culverts where possible. This will reduce the likelihood of blockages and can increase flood storage and was a recommendation that was set out in section 10.5.9 of the level 1 SFRA.

EN18: Flooding And Sustainable Drainage Systems

We are pleased to see that the council have taken our recommendations given at the draft consultation stage and those in the level 1 SFRA on board. We believe that this is a strong policy which is in accordance with the NPPF. The supporting text is reflective of the flood risk issues in the Reading Borough and sets out the required measures of mitigation needed for any new development.

Cont/d..

## Infrastructure Delivery Plan

We recommend that you mention the potential for flood defence infrastructure within the Reading Borough.

### Site allocations and safe access and egress

It has not been stated in the level 2 SFRA if Reading's Emergency Planning team have agreed to the safe access and egress approach set out in the level 2 SFRA. This could have implications to a number of sites being allocated in the Local Plan.

Paragraph 3.4.6 of the level 2 main report sets out Reading Borough Councils approach to safe access and egress for more vulnerable development. The Environment Agency detailed modelled extents show that the site allocations in the Local Plan should have safe access and egress for up to a 1 in 100 year flood event. The SFRA proposes to leave the full access and egress analysis to see if an area outside of the 1 in 100 year plus an allowance for climate change event is achievable, until the planning application stage. It is proposed that if a detailed flood risk assessment (FRA) demonstrates that safe access and egress can't be achieved in the 1 in 100 year plus an allowance for climate change event, then the emergency planning team will then be consulted to see whether an evacuation plan is acceptable. If not, then the site will be considered for less vulnerable development.

It has not been confirmed if Reading's emergency planning team have already had sight of these potential allocated sites where access and egress outside of a 1 in 100 year plus an allowance for climate change event may not be possible. If they haven't, there is a risk that the evacuation plans will not be approved. This would mean that these sites could become undeliverable for residential development at the planning application stage. This is an issue that the local planning authority need to be aware of and address in their evidence for their site allocations.

It should also be clarified if the emergency planning team have agreed with the safe access and egress approach for more vulnerable development for any windfall sites that may come forward too.

## **Water efficiency**

### H5: Standards for new housing

We are pleased to see that point b of this policy refers to the 'higher water efficiency standard' to be used for new dwellings which is 110/l/p/d in the Building Regulations Approved document Part G.

## **Water quality**

### Policy EN16: Pollution and Water Resources

We recommend adding to the first paragraph of policy EN16 with the following:

*'Developers will be expected to demonstrate that they have consulted with sewer undertaker regarding available capacity within the receiving network to accommodate effluent flows. A Drainage Strategy should be provided to ensure there are clear plans for the disposal of surface and effluent flows from the site.'*

### Paragraph 4.2.91

We strongly agree with the supporting paragraph 4.2.91.

### Infrastructure Delivery Plan

Thames Water highlight that the total development identified in the sewerage catchment draining to Blakes Lock SPS may cause concern if all developments were to go ahead. They welcome early consultation concerning any proposed development. It is therefore recommended that the local plan embeds a development control policy such as the one we have recommended above to require developers to provide evidence that they have consulted with the sewer undertaker and that capacity will be in place prior to occupation. This is important to avoid potential sewer flooding pollution incidents.

### **Groundwater quality and contaminated land**

#### Paragraph 3.2.3

The Local Plan appears to only consider a two dimensional view of Reading Borough. It does not consider the underlying geology and the sensitivity of the aquifers in particular the Chalk (Principal Aquifer) that in the southern part of the Borough is confined by the London Clay and Lambeth Group. Paragraph 3.2.3 says that Central Reading offers opportunities for tall buildings in appropriate locations. Since tall buildings will require the use of piling, any surface contamination could be connected to this aquifer.

Therefore we strongly recommend a caveat is added saying that the contaminative status of the land has to be considered where piling is to be used. Providing a definition of 'Appropriate' would be useful and should say something along the lines of: "that in some instances, due to contamination, that piling may not be suitable unless remediation is carried out to a suitable standard to protect the Principal Aquifer."

#### Policy EN16: Pollution and Water Resources

We still consider that Policy EN16 should include the need for dealing with unsuspected contamination. This is particularly important when there is no contaminative previous use stipulated on an application form due to the site having changed from a previously contaminative (industrial) to a current non-contaminative use such as an office block or car park. We recommend that this is included.

#### Local plan and sustainability appraisal and contaminated sites

There is a discrepancy between the Local Plan and the Sustainability Appraisal document regarding sites that had been identified as having potential for contamination.

Sites identified for development are listed in the Local Plan and some of these have been identified as having potential contamination issues and hence flagged up with the statement '\*Address any contamination on site'. We are concerned that this may be giving a misleading impression that all sites without this flag are uncontaminated.

Whilst this discrepancy has been amended in the November 2017 draft Local Plan for two sites :-

*CR13d, GAS HOLDER and  
WR3q NORCOT COMMUNITY CENTRE, LYNDHURST ROAD,*



This amendment has not been made for the following sites:

*CR14a CENTRAL SWIMMING POOL, BATTLE STREET;  
SR1a, b and c FORMER LANDFILL, ISLAND ROAD and  
SR4d 16-18 BENNET ROAD.*

For the purposes of clarity and accuracy this needs amending.

## **Nature conservation and watercourses**

### General comments

We were pleased to see that the majority of our suggested amendments in the nature conservation and river corridors section of our letter dated 30 June 2017 in response to the Draft reading Borough Local plan Regulation 18 consultation dated May 2017 have been incorporated into the pre-submission document.

Some of our suggested amendments were only partially included and therefore we would like to explain the reasons why we require stronger wording for two points in particular:

1. The 10m wide undeveloped ecological buffer zone between a new development and any watercourse should be measured from the top of the river bank and not the water's edge (as is often assumed), as the latter could be considerably smaller. Wording that included the top of the bank was included in site allocation CR14m on p.161 but not elsewhere.
2. The word watercourses should be used instead of waterways as the latter suggests a navigable river, whereas all watercourses should be included, whether navigable or not.

We strongly recommend that the following amendments that include the above points are also required to ensure that your Local Plan is deliverable and compliant with National Planning Policy Framework paragraphs 99, 109, 114 and 117.

### Policy EN11: Waterspaces

An additional bullet point should be included in this policy:

*'Planning permission will only be granted for development proposals which would not have an adverse impact on the functions and setting of any watercourse and its associated corridor.'*

### Paragraph 4.2.47

This paragraph seeks to promote the active use of the waterside environment. While we support this ethos, we would still expect there to be a 10m undeveloped buffer zone measured from the bank top, which could of course be used for informal recreation. Ecological enhancements to watercourses in the borough does not conflict with contributing '...to the creation of attractive...waterside environments...' as native planting can create both an attractive and safe environment.

### Paragraph 4.2.48

The mention of the two main rivers (i.e. Thames and Kennet), Holy Brook and '...other small tributaries within Reading...' suggest that only the town centre is being considered. Please can it be made clearer that there are a number of additional watercourses within Reading Borough and that all are important ecologically?

#### Paragraph 4.2.50

Please add that the undeveloped buffer zone should be a minimum of 10m wide measured from the top of the river bank.

#### Paragraph 4.2.52 (previously 4.2.51)

With regard to the Thames Parks Plan, more could be done to enhance the ecological value of parks that are adjacent to watercourses. There are major opportunities to do this in these areas which are not currently being realised.

This supporting paragraph should be added as follows:

*'Watercourses that are adjacent to parks will be enhanced for the benefit of wildlife and people'*

#### Paragraph 4.2.53

Due to recent changes in Environment Agency permitting, please could you replace the following sentence:

*'In addition, the Environment Agency will also consider proposals affecting watercourses under separate legislation. Development within 8 metres of the riverbank will require the prior consent of the Environment Agency under the Thames Region Land Drainage Byelaws.'*

With the following:

*'The Environment Agency must be consulted for any proposals affecting watercourses under separate legislation. Developments within 8 metres of the top of a river bank of a main river is likely to require the prior consent of the Environment Agency under the Environmental Permitting Regulations, 2016.'*

The link to environmental permits is:

<https://www.gov.uk/topic/environmental-management/environmental-permits>

#### Policy EN12: Biodiversity and the Green Network

Please replace the last sentence of part b) 'It should not replace existing alternative habitats, and should be provided prior to development.' with:

*'The compensatory habitat should be the same habitat type that will be lost to the development and should be established prior to development.'*

#### Policy CC3: Adaptation to Climate Change

With regard to the third bullet point, please can you add that any planting plans along river corridors or in any other semi-natural habitat, should only use native plants of UK provenance?

#### Vision

We would like to see more emphasis put on the fact that much of Reading's heritage and landscape is tied to the rivers and their valleys and floodplains.

#### Paragraph 3.2.5

Reference is made to the risk of flooding and rivers being physical barriers to movement. This focuses only on the constraints that rivers impose. More emphasis should be put on the opportunities that rivers provide, i.e. they should be seen as assets and not constraints.

#### Paragraph 4.1.27

This paragraph again refers to rivers as barriers/constraints rather than as opportunities and features. The emphasis should be changed so that rivers are seen as assets rather than barriers for development.

#### Policy CC7: Design and the Public Realm

The first sentence in this policy should be amended to read:

*“All development must be of high design quality that maintains and enhances the character, appearance and ecological value of the area of Reading in which it is located.”*

In the second bullet point, add ‘*and ecology*’ after “Landscape”.

In the third set of bullet points, in the first bullet point insert ‘*and ecological*’ between “historic” and “environment”.

#### Paragraph 4.2.45

With regard to the last sentence, we agree that paths alongside watercourses do provide an opportunity to enhance the network of green links and corridors across the Borough, but would stress that this paragraph should include ecological enhancement such as the 10 metre ecological buffer zones measured from the top of the river bank.

#### Paragraph 4.5.8

With regard to the bullet point about the potential new crossing of the River Thames, please add that should this be agreed, it must be designed in such a way as to ensure that the river, river corridor and adjacent lakes are not impacted negatively.

### 5.3 General Policies for Central Reading

#### Policy CR3: Public Realm in Central Reading

The first sentence of point iv of this policy should be amended to read:

*“The design of developments adjacent to a watercourse, including the refurbishment of existing buildings, will be required to enhance the appearance and ecological value of the watercourses....”*

In the last sentence of point iv of this policy, please replace “waterways” with ‘*watercourses*’ (all were amended in iii and iv apart from this one instance).

#### **Site and area allocations, river corridors and ecology**

We strongly advise you to include the following amendments concerning the site allocations and the opportunity areas to be compliant with national planning policy and your emerging policy EN11 and the changes we have recommended for that policy.

#### CR11g, Riverside

In the first sentence, insert ‘*the top of the bank of*’ before “the river” and at the end of this sentence, add ‘*to create an undeveloped ecological buffer with enhanced ecological value.*’

#### Policy CR13: East Side Major Opportunity Area

##### CR13b, Forbury Retail Park and CR13d, Gas Holder

We are pleased to see reference to buffer zones along the River Kennet in CR13b, Forbury Retail Park and CR13d, Gas Holder. These should be amended to state that the buffer zones should be a minimum of 10 metres in width measured from the top of the river bank, that they should be free from development and the ecological value enhanced. For 13d Gas Holder, we do not believe that access to Kennet Mouth is necessary as there is access on the opposite side and a footbridge very close by.

#### CR13c, Kenavon Drive & Forbury Business Park

While this does state that ‘...opportunities to create an area of open space close to the Kennet should be sought.’, to be consistent with 13b and 13d, it should also include a buffer zone that is a minimum of 10 metres in width measured from the top of the river bank, that should be free from development and the ecological value enhanced.

For all riverside sites, reference should be made to policy EN11: Waterspaces.

#### CR14: Other Sites for Development in Central Reading

##### CR14m, Caversham Lock Island and Caversham Weir, Thames Side

In the fifth bullet point, we are pleased to see the inclusion of ‘...and set buildings back at least ten metres from the top of the bank of the river;’ For consistency, this wording should be used throughout the document when referring to ecological buffers to watercourses.

A sixth bullet point should be added: ‘*Not impact on the operation of the lock and weir.*’

#### Policy SR1: Island Road Major Opportunity Area

At the end of point v, please remove ‘based on the findings of an ecological assessment;’ as the biodiversity of all watercourses and their riparian corridors should be protected and enhanced, irrespective of the findings of an ecological assessment.

##### SR1a, Former Landfill, Island Road

The words ‘*measured from the top of the river bank*’ should be added between ‘...and a 10m undeveloped buffer’ and ‘to the watercourse to the east.’

##### SR1b, North of Island Road

Please add that the ecological buffer to the River Kennet should be a minimum 10m wide, measured from the top of the river bank.

#### SR4: Other Sites for Development in South Reading

##### SR4a, Pulleyn Park, Rose Kiln Lane

Amend the first bullet point to read “*Include a landscaped ecological buffer a minimum of 10 metres in width to the River Kennet, measured from the top of the bank of the watercourse, to ensure no detrimental impacts ...*” Omit “wherever possible” at the end of the sentence in this bullet point.

Add to the end of the second bullet point “*to the stream and its associated river corridor. This will include an undeveloped ecological buffer zone of at least 10 metres width measured from the top of the bank on both sides of the watercourse.*”

##### SR4e, Part of Former Berkshire Brewery Site

Third bullet point: We are pleased to see that development should be set back at least 10m from the river, but please add that this should be measured from the top of the river bank and that it should include ecological enhancements.

##### SR4f, Land South West of Junction 11 of the M4

We are pleased to see that a 10m buffer to the watercourse has been included, but please add that this should be measured from the top of the river bank and that it should include ecological enhancements.

#### Leisure and Recreation Use of the Kennetside Areas

Paragraph 6.3.20 (previously 6.3.19) - With regard to any proposed marina development, consideration would have to be given to the potential for additional boat traffic to have a deleterious impact on the River Kennet Site of Special Scientific Interest further upstream.

## 8.2 Strategy for Caversham and Emmer Green

Paragraph 8.2.2 – Mention is made of the potential for development involving residential gardens. This is at odds with paragraph 4.2.60 in support of policy EN12, which stresses the importance of “well vegetated gardens” as green links through the Borough.

## Figure 10.2 Summary Infrastructure Delivery Schedule Green Infrastructure

Open Spaces Strategy - should have a focus on ecological enhancement.  
Biodiversity Plan – replace the word ‘waterways’ with ‘*watercourses*’.

## Figure 11.1 Monitoring Framework

With regard to the ‘Area of Biodiversity Action Plan habitat’ indicator, rather than having a target of ‘No net loss’, there should be a more stretching target for positive gain.

### **Final Comments**

Once again, thank you for contacting us. Please quote our reference number in any future correspondence.

If you have any queries please contact me.

Yours sincerely

**Ms Michelle Kidd**  
**Planning Advisor**

Direct dial 02030259712  
E-mail [planning\\_THM@environment-agency.gov.uk](mailto:planning_THM@environment-agency.gov.uk)

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**PART A - YOUR DETAILS**

**Personal Details**

**Agent's Details** *(if applicable)*

Title	Miss	
First Name	Michelle	
Last Name	Kidd	
Job Title <i>(if applicable)</i>	Planning Advisor	
Organisation <i>(if applicable)</i>	The Environment Agency	
Address 1	Red Kite House	
Address 2	Howbery Park	
Address 3		
Town	Wallingford	
Post Code	OX10 8BD	
Telephone	02030259712	
E-mail	Planning_THM@environment-agency.gov.uk	

**PART B - YOUR REPRESENTATION** (please use a separate form for each representation)

**B1. To which part of the Local Plan does this representation relate?**

Sequential and Exception Test of sites in the Pre-Submission Draft Local Plan.  
December 2017.

**B2. Do you consider that the Local Plan:** (please tick as appropriate)

Is legally compliant?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Is sound?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
Fulfils the duty to co-operate?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

**B3. Please provide details of why you think the Local Plan, or part of the plan, is or is not legally compliant, sound and/or complies with the duty to co-operate.**

In the sequential test it is not clear to us why some sites have been discarded in Flood Zone 1 whilst there are sites allocated in Flood Zone 3. The sequential test does not explain in planning terms why sites at a lower risk of flooding have been discounted. Paragraphs 2.3 and 2.4 refer to regeneration needs but it is not clear why this outweighs flood risk. Therefore the evidence base is not robust and the plan is unsound as it is not justified.

*Please continue on another sheet if necessary*

**B4. Please set out the modifications that you think would make the Local Plan, or part of the plan, legally compliant and/or sound. Please provide specific wording where possible.**

We need further clarification and justification on these points regarding the sequential test. We need to know the planning reasons for discounting sites at a lower risk of flooding. How do these reasons outweigh flood risk?

*Please continue on another sheet if necessary*

**B5. If you are seeking a modification to the plan, do you wish to appear in person at the public examination?**

Yes

No

**B6. If you wish to appear in person, please briefly outline why you consider this necessary.**

To ensure that the flood risk evidence is adequately addressed during the examination.

**B7. Do you wish to be kept informed of planning policy matters?**

(please tick as appropriate)

Please keep me informed of the progress of this Local Plan:

Yes

Please keep me informed of all planning policy matters:



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**Agent's Details** *(if applicable)*

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**PART B - YOUR REPRESENTATION** (please use a separate form for each representation)

**B1. To which part of the Local Plan does this representation relate?**

Strategic Flood Risk Assessment (SFRA) Level 1

**B2. Do you consider that the Local Plan:** (please tick as appropriate)

Is legally compliant?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Is sound?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
Fulfils the duty to co-operate?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

**B3. Please provide details of why you think the Local Plan, or part of the plan, is or is not legally compliant, sound and/or complies with the duty to co-operate.**

Paragraphs 10.1.7 -10.1.9 of the Level 1 SFRA tries to define functional floodplain which is Flood Zone 3b. This has been defined in two categories as Flood Zone 3b 'Developed' and Flood Zone 3b 'Functional Floodplain'. The definition of Functional Flood Plain 'Developed' is "areas of 'previously developed land', which are considered equivalent to Flood Zone 3a for planning purposes. "The definition of Flood Zone 3b 'Functional Floodplain' is "areas of existing open space that are subject to flooding.

Our concern with the 'developed' definition of the functional floodplain is that more vulnerable and highly vulnerable development may be promoted in the Functional Floodplain (Flood Zone 3b). This is not consistent with national policy, which is the National Planning Policy Guidance (NPPF) paragraph 100 which states that:

"Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk"

and

"Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property"

In table 3 titled 'Flood risk vulnerability and flood zone 'compatibility' of the Planning Practice Guidance it states that less, more and highly vulnerable development should not be permitted in Flood Zone 3b (Functional Floodplain). As the Environment Agency we will object to any development which is inappropriate with the flood zones according to Table 3. Therefore the guidance within paragraphs 10.1.7 -10.1.9 of the SFRA Level 1 is not consistent with national policy.

We do not believe that the definitions of functional floodplain in paragraphs 10.1.7 and 10.1.8 clearly set out that inappropriate development will not be permitted in these flood zones.

Paragraph 10.1.8 of the level 1 SFRA, further promotes inappropriate development in the functional floodplain by taking the definition of 'previously developed land' from the glossary of the National Planning Policy Framework, and misinterpreting it to be used to define the functional floodplain 'developed'. Paragraph 10.18 reads as follows:

***“Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time”.***

This definition of 'previously developed land' is not meant to be referred to in the context of the functional floodplain. Our concern is that planning applicants may consider this definition to mean that any new development on land that is subject to flooding in a 1 in 20 (5%) annual probability fluvial flood event, will be appropriate as long as there is a structure already on the land, regardless of what this structure is, or whether the land is prevented from flooding in a 1 in 20 year flood event by existing defences, infrastructure or solid buildings or not.

For example, a developer could argue that this definition means that a residential dwelling could be located on a site within the 1 in 20 year flood extent, as there is an existing warehouse on the site. This would result in an increase of the vulnerability of the development on the site, putting future occupants at risk of flooding.

If the definitions within paragraphs 10.1.7 and 10.1.8 are necessary for site allocations in this local plan then the local planning authority need to justify this decision as part of their local plan evidence. However these definitions are a concern to us as they may be used more widely as detailed above.

*Please continue on another sheet if necessary*

**B4. Please set out the modifications that you think would make the Local Plan, or part of the plan, legally compliant and/or sound. Please provide specific wording where possible.**

Paragraphs 10.1.7-10.1.9 need to be clear that they follow Table 3 of the Planning Practice Guidance so there is no inappropriate development within Flood Zones 3b or 3a. The definition of previously developed land needs to be removed or clarified so it is clear what this will mean for applicants and developers. This is especially the case if the vulnerability of the development on site increases. It also needs to be clear that the sequential and exception test may need to be applied in accordance with national planning policy and that a flood risk assessment will be required.

*Please continue on another sheet if necessary*

**B5. If you are seeking a modification to the plan, do you wish to appear in person at the public examination?**

Yes

No

**B6. If you wish to appear in person, please briefly outline why you consider this necessary.**

To ensure that the flood risk evidence is adequately addressed during the examination.

**B7. Do you wish to be kept informed of planning policy matters?**

(please tick as appropriate)

Please keep me informed of the progress of this Local Plan:

Yes

Please keep me informed of all planning policy matters:

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**PART A - YOUR DETAILS**

	Personal Details	Agent's Details <i>(if applicable)</i>
Title	Miss	
First Name	Michelle	
Last Name	Kidd	
Job Title <i>(if applicable)</i>	Planning Advisor	
Organisation <i>(if applicable)</i>	The Environment Agency	
Address 1	Red Kite House	
Address 2	Howbery Park	
Address 3		
Town	Wallingford	
Post Code	OX10 8BD	
Telephone	02030259712	
E-mail	Planning_THM@environment-agency.gov.uk	

**PART B - YOUR REPRESENTATION** (please use a separate form for each representation)

**B1. To which part of the Local Plan does this representation relate?**

Strategic Flood Risk Assessment (SFRA) Level 2 - Site AB099 Network Rail Land, Napier Road

**B2. Do you consider that the Local Plan:** (please tick as appropriate)

Is legally compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Is sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Fulfils the duty to co-operate?	Yes <input type="checkbox"/>	No <input type="checkbox"/>

**B3. Please provide details of why you think the Local Plan, or part of the plan, is or is not legally compliant, sound and/or complies with the duty to co-operate.**

According to our flood map for planning, the boundary for this site is in FZ3 and not FZ2 as stated in the level 2 SFRA. Unless a topographical survey demonstrates that this site lies above the 1 in 100 year flood level. If a topographical survey does not demonstrate that the site boundary lies above the 1 in 100 year flood level, then the flood mitigation measures for the development will need to be designed to the 1 in 100 plus climate change allowance of 35% and not 25% as stated in the level 2 SFRA. Residual risk to the development should be investigated against the 1 in 100 annual probability +70% allowance for climate change flood event and not the +35%.

We recommend that the level 2 SFRA and sequential test are updated to include the evidence as to why this site is considered FZ2 and not FZ3. If this is not possible, then we recommend that the documents are updated to reflect the possibility that the site may lie in FZ3 and therefore, any flood risk mitigation will need to be designed to the 1 in 100 plus climate change allowance of 35% with further resilience measures designed to 1 in 100 plus climate change allowance of 70%.

All development will take place on the Western edge of the site but it is not clear how much. The development allocation is for 210-310 dwellings but this allocation will be shared alongside site AB007 (Napier Court).

Therefore the evidence for the local plan is unsound as it is not justified or effective.

*Please continue on another sheet if necessary*

**B4. Please set out the modifications that you think would make the Local Plan, or part of the plan, legally compliant and/or sound. Please provide specific wording where possible.**

We recommend that the council consider the effect that providing flood risk mitigation measures up to the 1 in 100 plus climate change allowance of 35% could have on the proposal and be confident that they can allocate the level of required dwellings on this site and still provide the necessary floodplain compensation.

A route of safe access and egress will need to be provided to an area of land wholly outside the 1 in 100 plus an allowance for climate change flood level of +35%. As this assessment is being left until the planning application stage, the council should also be sure that the emergency planning team would be willing to except an evacuation plan if it becomes apparent that a safe access and egress route is not achievable.

We advise that the emergency planning team are consulted prior to these sites being out forward in the local plan. If a safe access and egress route cannot be achieved to an area outside of the 1 in 100 year flood plus an appropriate allowance for climate change extent, then it should be confirmed that an evacuation plan would be acceptable.

*Please continue on another sheet if necessary*

**B5. If you are seeking a modification to the plan, do you wish to appear in person at the public examination?**

Yes  No

**B6. If you wish to appear in person, please briefly outline why you consider this necessary.**

To ensure that the flood risk evidence is adequately addressed during the examination.

**B7. Do you wish to be kept informed of planning policy matters?**

(please tick as appropriate)

Please keep me informed of the progress of this Local Plan:  Yes

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**PART A - YOUR DETAILS**

	Personal Details	Agent's Details <i>(if applicable)</i>
Title	Miss	
First Name	Michelle	
Last Name	Kidd	
Job Title <i>(if applicable)</i>	Planning Advisor	
Organisation <i>(if applicable)</i>	The Environment Agency	
Address 1	Red Kite House	
Address 2	Howbery Park	
Address 3		
Town	Wallingford	
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E-mail	Planning_THM@environment-agency.gov.uk	



**PART B - YOUR REPRESENTATION** (please use a separate form for each representation)

**B1. To which part of the Local Plan does this representation relate?**

Strategic Flood Risk Assessment (SFRA) Level 2 - Site AB005 Riverside

**B2. Do you consider that the Local Plan:** (please tick as appropriate)

Is legally compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Is sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Fulfils the duty to co-operate?	Yes <input type="checkbox"/>	No <input type="checkbox"/>

**B3. Please provide details of why you think the Local Plan, or part of the plan, is or is not legally compliant, sound and/or complies with the duty to co-operate.**

The level 2 SFRA classifies this site as Flood Zone 2. According to our flood map for planning, the site boundary is partly within the Flood Zone 3 flood extent. The level 2 SFRA assessment says that the site lies above Flood Zone 3a and is therefore Flood Zone 2. We can't see any evidence that this is the case. It could be due to the fact that the spatial grid cells in this model are quite large, but if we are consulted on this site as a planning application, we would expect to see this demonstrated by a topographical survey showing that all areas within the site boundary lie above the 1 in 100 year flood level (Flood Zone 3).

If it is found that the site lies within Flood Zone 3, although residential dwellings on this site will still be appropriate in accordance with table 3 of the NPPF, it will have consequences on what the appropriate climate change allowance should be for this site. If a topographical survey does not demonstrate that the site boundary lies above the 1 in 100 year flood level, then the flood mitigation measures for the development will need to be designed to the 1 in 100 plus climate change allowance of 35% and not 25% as stated in the level 2 SFRA. Residual risk to the development should be investigated against the 1 in 100 annual probability +70% allowance for climate change flood event and not the +35%.

Therefore the evidence for the local plan is unsound as it is not justified or effective.

*Please continue on another sheet if necessary*

**B4. Please set out the modifications that you think would make the Local Plan, or part of the plan, legally compliant and/or sound. Please provide specific wording where possible.**

We recommend that the level 2 SFRA and sequential test are updated to include the evidence as to why this site is considered FZ2 and not FZ3. If this is not possible, then we recommend that the documents are updated to reflect the possibility that the site may lie in FZ3 and therefore, any flood risk mitigation will need to be designed to the 1 in 100 plus climate change allowance of 35% with further resilience measures designed to 1 in 100 plus climate change allowance of 70%.

We recommend that the council consider the effect that providing flood risk mitigation measures up to the 1 in 100 plus climate change allowance of 35% could have on the proposal and be confident that they can allocate 250 - 370 dwellings and 1,000 and 2,000m<sup>2</sup> of leisure on this site and still provide the necessary floodplain compensation. If the floor levels have to be raised higher, there may be other planning constraints that conflict with this?

Consideration should be given to the possibility that a 1 in 100 flood plus climate change allowance of 70%, could result in a sudden increase and speed of flooding to the site if the high wall to the North of the site could be overtopped by flood water. Therefore the residual risk could have a significant effect on any development. If this is the case, it may be that consideration is given to designing the flood risk mitigation measures to the climate change allowance of 70% and not just the 35%.

A route of safe access and egress will need to be provided to an area of land wholly outside the 1 in 100 plus an allowance for climate change flood level of +35%. As this assessment is being left until the planning application stage, the council should also be sure that the emergency planning team would be willing to accept an evacuation plan if it becomes apparent that a safe access and egress route is not achievable.

The policy for this site should be updated to include that ***Development should take account of mitigation required as a result of a Flood Risk Assessment***, as with the other sites that are situated in the flood zones.

We understand that this site is to serve as a gateway connecting Caversham and the pedestrian bridge to the train station. The site is currently on a raised plinth. We presume that the ground level will remain the same and that the ground will not be lowered, which in turn would increase the flood risk on this site and also increase the risk of this site being deliverable.

*Please continue on another sheet if necessary*

**B5. If you are seeking a modification to the plan, do you wish to appear in person at the public examination?**

Yes

No

**B6. If you wish to appear in person, please briefly outline why you consider this necessary.**

To ensure that the flood risk evidence is adequately addressed during the examination.

**B7. Do you wish to be kept informed of planning policy matters?**

(please tick as appropriate)

Please keep me informed of the progress of this Local Plan:

Please keep me informed of all planning policy matters:

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**PART A - YOUR DETAILS**

	Personal Details	Agent's Details <i>(if applicable)</i>
Title	Miss	
First Name	Michelle	
Last Name	Kidd	
Job Title <i>(if applicable)</i>	Planning Advisor	
Organisation <i>(if applicable)</i>	The Environment Agency	
Address 1	Red Kite House	
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Telephone	02030259712	
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**PART B - YOUR REPRESENTATION** (please use a separate form for each representation)

**B1. To which part of the Local Plan does this representation relate?**

WR4: Potential Traveller Transit Site at Cow Lane

**B2. Do you consider that the Local Plan:** (please tick as appropriate)

Is legally compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Is sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Fulfils the duty to co-operate?	Yes <input type="checkbox"/>	No <input type="checkbox"/>

**B3. Please provide details of why you think the Local Plan, or part of the plan, is or is not legally compliant, sound and/or complies with the duty to co-operate.**

The site boundary for this site allocation is in FZ3. Table 2 of the National Planning Practice Guidance classifies caravans, mobile homes and park homes intended for permanent residential use as 'highly vulnerable' and Table 3 shows that this vulnerability would not be compatible with Flood Zone 3. We advised in our consultation response to the *Reading Borough Gypsy and Traveller, Travelling Showperson and Houseboat Dweller Accommodation Assessment 2017* on 06 Nov 2017 that this site is redrawn to exclude all areas of Flood Zone 3. This has not been done. We recommend that the site boundary is redrawn, otherwise we would object to the planning application for this site as it would be contrary to the NPPF.

*Please continue on another sheet if necessary*

**B4. Please set out the modifications that you think would make the Local Plan, or part of the plan, legally compliant and/or sound. Please provide specific wording where possible.**

If this site is redrawn so that the site lies wholly within FZ2, then the exception test is required in accordance with table 3 of the NPPF. The flood risk for this site has not been assessed in the level 2 SFRA and therefore it has not been shown that it has passed the exception test.

We suggest that the flood risk for this site is assessed in the level 2 SFRA and if part 2 of the exception test can be passed, suitable flood risk mitigation measures are incorporated into the site specific policy.

*Please continue on another sheet if necessary*

**B5. If you are seeking a modification to the plan, do you wish to appear in person at the public examination?**

Yes  No

**B6. If you wish to appear in person, please briefly outline why you consider this necessary.**

To ensure that the flood risk evidence is adequately addressed during the examination.

**B7. Do you wish to be kept informed of planning policy matters?**

(please tick as appropriate)

Please keep me informed of the progress of this Local Plan:

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**PART A - YOUR DETAILS**

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**PART B - YOUR REPRESENTATION** (please use a separate form for each representation)

**B1. To which part of the Local Plan does this representation relate?**

The Reading BC local plan evidence base - Water Cycle Study

**B2. Do you consider that the Local Plan:** (please tick as appropriate)

Is legally compliant?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Is sound?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
Fulfils the duty to co-operate?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

**B3. Please provide details of why you think the Local Plan, or part of the plan, is or is not legally compliant, sound and/or complies with the duty to co-operate.**

There are a significant number of new houses proposed within this growth period (>15,000) which equates to an additional effluent flow of approx. 5400m<sup>3</sup>/day that will eventually end up in the rivers. Only Reading Sewage Treatment Works (STW) is mentioned within the Infrastructure Delivery Plan (IDP), therefore it is assumed that this works will be receive effluent from all the proposed growth. This growth may have an impact on the water quality downstream of the STW. At present it is unclear if there is supporting evidence to show that this growth will not impact on the objectives of the Water Framework Directive (WFD).

If the Council cannot satisfy the following questions it may be likely that a Water Cycle Study (WCS) may be required as part of the evidence base to show that the Local Plan strategy, policies, and/or allocations for new development are the most appropriate for an area, are deliverable within the timescales and are supported by suitable infrastructure, without detrimental impact on the water environment to ensure the Local Plan is deemed sound at inspection:

- Will the proposed housing growth have a detrimental impact on water quality?
- Is there sufficient environmental capacity within the receiving water environment to accommodate the resulting increase in flow and pollutant loads from the Sewage Treatment Works as the result of the planned housing growth?
- If not, are there alternative discharge locations that will not cause a failure of water quality targets or cause deterioration in water quality?
- Is there an increased risk of discharges from storm water overflows causing an adverse water quality impact?



- Will the sewerage undertaker need to apply to increase the level of treated sewage effluent that is allowed to be discharged under the existing environmental permits, to allow for future growth?
- Will the quality standard on the environmental permit need to be tightened to meet existing or future water quality standards as a result of the proposed growth (e.g. Water Framework Directive (WFD))?
- Can the existing sewerage and wastewater treatment networks cope with the increased wastewater the proposed growth will generate?

Without the above assessment the local plan and the proposed growth may not be consistent with national policy and may not be justified or effective. The relevant National Planning Policy framework (NPPF) paragraphs are 110, 120, 165 and 173.

*Please continue on another sheet if necessary*

**B4. Please set out the modifications that you think would make the Local Plan, or part of the plan, legally compliant and/or sound. Please provide specific wording where possible.**

In order to be satisfied that the proposed growth set out in the Reading Local plan does not have an impact on water quality then the above questions will need to be answered and if necessary a water cycle study will need to be completed. When this evidence is completed the local plan policy concerning water quality and the infrastructure delivery plan may need to be updated to reflect the findings of the water cycle study.

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*Please continue on another sheet if necessary*

**B5. If you are seeking a modification to the plan, do you wish to appear in person at the public examination?**

Yes

No

**B6. If you wish to appear in person, please briefly outline why you consider this necessary.**

To ensure that the water quality evidence is adequately addressed during the examination.

**B7. Do you wish to be kept informed of planning policy matters?**  
(please tick as appropriate)

Please keep me informed of the progress of this Local Plan:

 Yes

Please keep me informed of all planning policy matters:

EVANS, GARY

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**From:** Gary Evans  
**Sent:** 26 January 2018 15:57  
**To:** Planning Policy  
**Subject:** Reading Golf Course planning proposals objection  
**Attachments:** Statement 23rd January 2018 Final  
Version.pdf

**This is an EXTERNAL EMAIL. STOP. THINK before you CLICK links or OPEN attachments.**

Dear sir/madam

I am emailing to express my concerns about the proposal for development on the golf course, as highlighted in your Pre-Submission Draft Reading Borough Local Plan November 2017.

This has just been brought to our attention by local residents and some that are as do, have our properties backing onto the golf course. This is therefore of concern to us and due to the fact that Caversham and Emmer Green are already suffering from over development and cannot handle or support the existing population with the current infrastructure in place.

The increase in traffic into the area particularly with developments in South Oxfordshire, namely in Sonning Common is also bearing more weight and strain on the only two road traffic bridges we have in Reading.

The current NHS services with local surgeries and the Royal Berks hospital are under strain and under performing, we are at Priory Avenue surgery regarded as one of the worst in the country and with an increase in more housing into the area it will not get any better!

The schooling is also under strain and a new school still not agreed for the Caversham area? albeit there was one in the planning for when Bugs Bottom was passed and never appeared?

The golf course is steeped in history over 100 years old and should be kept for recreation to the community of Reading and surrounding areas without alteration.

When we had planning submitted for an extension to our property on Highdown Hill Road in Emmer Green, it was initially turned down for being an 'Over visually dominant bulk and not in keeping with the natural beauty and surroundings of the area' what impact would 90 - 130 houses do to this area in respect to natural beauty?

There are many trees with TPO's along and across the golf course as well as natural areas for wild life to thrive, we have seen deer, pheasants, foxes, badgers, bats, hedgehogs, toads, frogs, many bird species and more in our garden. This would create a massive impact to the wild life in the area.

I understand too from some of the members that they are not keen on this either and that it may be in the interest more for the shareholding members, as I am led to believe that they may get a substantial return with any development that gets passed.

I have read the statement which is attached from the Chairman, that a member has sent to me and it appears that the club has financial difficulties and that they are keen to progress with this. This is not in the interest of all members and certainly not all local residents! The club should be open more to the public and considering improvements in management, then perhaps it would be in a better place and continue to provide sport for the local community.

We object to any planning proposals and can be contacted by email or my mobile if required.

Kind regards

Mr Gary Evans

Email to the membership

Subject: The future of Reading Golf Club Ltd

## Background

First of all, let me confirm what was said last week. No agreement has been entered into by the club by way of planning or development. Understandably there has been increased speculation last week following the Board's decision to suspend offering shareholding membership and we believe that decision was in the shareholders' best interest.

I believe the memo that we issued in August, whether you agreed with all the content or not, was one of the most open statements from a Board of Reading Golf Club to its members. We informed members of the process we were undertaking and that we would come back to the membership when we had something substantial to share.

The sole agenda in all of this has been to investigate opportunities and to develop a long-term strategy for Reading Golf Club. That was our starting point and whilst no-one needs to be or should be held responsible for where we find ourselves now, we could all be accountable for ignoring the warning signs.

We promised that nothing can or will be done without the will of the membership and that promise remains full and intact. I must thank all the Board for their work on this to date but in particular our Treasurer Ian Roostan and General Manager Gary Stangoe who have churned through an inordinate amount of work, mostly during unsociable hours, to bring us to a point where we can present some findings, opportunities and recommendations.

## Our Current Situation

Ian has brought a short sharp reality check to our financial position. This will be made clearer at the AGM but this week a highly respected club in this area has announced losses of nearly £190,000 before tax. We know many others, including ourselves, are enduring six-figure operating losses following years of similar results and sadly, as was highlighted by the BBC news last week, we are operating a golf model that is just not sustainable.

For nearly twenty years, successive Boards of this club have discussed but not addressed a variety of issues. These include the deteriorating greenkeepers' compound, (never mind our legal requirement to provide a proper environmentally acceptable washdown facility), necessary machinery outlay, a 25-year-old irrigation system that will need replacing shortly, greens drainage work, repair of the car park and a building in desperate need of repairs and improvements. If all these issues were to be corrected over the next 5 years, then we estimate a spend in the region of £1million, with at least 400k in the short term.

The impending Grey's Green golf operation with planned membership fees of around £900 when fully open will tempt members away, especially if we were to, as is required, introduce substantial subscription increases to cover losses.

Clubs who provide top quality facilities continue to do well and many, whilst not operating what could be regarded as great courses, have pitched themselves at a price point to attract

the ever-increasing nomadic golfer and they too are doing well. The clubs offering leisure facilities also seem to thrive. Castle Royal, Foxhills and to a slightly lesser extent Mapledurham, are prime examples. That is not to say the number of golfers is increasing, they are not, they are decreasing, as are the numbers of members in clubs. Increasing numbers of regular golfers just want to pay and play and are not interested in membership, as identified by leading figures in the golf industry.

## Our Future

### Option 1 – Staying at our current location

Reference has been made to selling assets. Realistically we have limited properties which could be sold to help cover the impending costs we will need to absorb over the next five years. These improvements will not bring the much-needed increase in revenue and in effect will only prove to be expensive sticking plasters.

In continuing business at the club, operational costs must be reduced and income increased. We have identified green-fee income as our best opportunity to increase revenue and to do so we must utilise the tee-time booking system more effectively. Most golfers book online now and unused playing times must be made visible to the modern golfer. Restrictions on society bookings later in the day on weekends also need to be removed.

Catering services offered in the clubhouse will be reduced but the halfway house operation would continue unaffected as the members have requested this facility.

Despite increasing our membership, our subscription income is relatively static. Juniors pay very little, Intermediates (18-34 year olds) are on a sliding scale, and more of our members benefit from the reduced fees as they are over 80 years old. The club has limited practice facilities which limits the teaching of juniors and deters new members as they expect and want to have the full facilities that other clubs offer.

We are currently losing £200 per member per year. Further to this, the essential work needed in the short term will require, at the very least, an additional £200 per golfing member per year and these figures assume that membership numbers remain the same as 2017. As such, full members would be required to pay £1936, rather than £1536 this year. Social members would also be expected to pay an increased subscription. These figures are guidelines only and may be revised when we set next year's subscriptions. The knock-on effect of these increases will likely mean a reduction in members and the problem of diminishing returns would therefore be exacerbated.

We could borrow money for working capital against the club's assets, to be paid back over a number of years. However this would also impact on the subscription fees.

Should the club fail in the future, there may not be an opportunity to maximise money from the sale of the land. A speculative developer may purchase the land for a relative "pittance" and then reap the benefit of developing the land, leaving nothing for the shareholders.

### Option 2 – Sell some or all of the land assets

We are incredibly grateful for the assistance of a member, Jonathan Walton, in guiding us very professionally through the minefield of planning and development opportunities. Both Reading Borough and South Oxfordshire District Councils have a serious shortfall of land available for development in the next 20 year period. Once land has been identified, no more calls for land should be required till 2038.

The substantial offer received recently for an acre and a half of road frontage could have built us a new clubhouse, relocation of car park and a new 18<sup>th</sup> green but this would still leave us with a similar ailing business model on a shorter golf course with even more neighbours within our shrinking footprint.

A large proportion of Reading Golf Club land has been identified by the South Oxfordshire District Council as meeting the criteria suitable for development and have given approximate numbers of around 480 houses in a phased development stretching over a 10-15 years timeframe. If you add that to the land already on the Reading Borough Council development plan with other opportunities that may arise, you will understand the financial implications of this.

It has been clear from the beginning that a “Master Plan” needs to be developed and must be mindful of the location we are in, our neighbours and the environment. Just putting land up for mass development will be embroiled in politics and debate for many years and would be unlikely to be approved.

### Option 3 – Relocate the Club

A limited number of opportunities have been presented to us at this time. Two current opportunities would allow the shareholders to influence the development and the facilities that we believe you would expect.

With your approval, the sale of our land and relocating the club to a location within reasonable proximity that offers a family friendly clubhouse, with increased facilities to maximise revenue streams and has improved all year-round course conditions is a current possibility.

This will ensure employment is retained or increased and will offer an improved and hopefully nationally recognised facility, which will be reassuring to the planning authorities. This will give us the club model which the R&A and England Golf see as the club of the future. Over the last 18 months or so we have really expanded the base of our membership with around 90 juniors and 60 intermediate members. Having proper facilities to develop new members will be crucial in the future and is just not possible at our current location.

This relocation will be a fundamental and crucial part of the “Masterplan”. To do so and to cover all costs of planning we are at a point now that we need to appoint land agents and to engage in formal discussions and agreements with a series of quality developers. Informal meetings have proved beneficial in reassuring the Board there is an exciting future for the club, but the next step is to employ the professionals to do a thorough job on behalf of the shareholders. We anticipate that most costs will not be directly absorbed by the club but that they will be covered by developers and then recovered out of the proceeds. We will not progress beyond a point of no return without securing a new home for Reading Golf Club. As soon as we can announce what the Board unanimously believe the best location and facility is for the club’s future, we will do so.

Realistically, even if all plans came to fruition we are likely to have use of the existing site for 2/3 years. However we cannot endure continuing losses by continuing our current processes.

We are sure all of you will wish to know how this would affect you all financially. At this point we would expect that no more than 10% of the expected total nett sale would be invested in securing a facility and leaving the club in a very secure financial position for the future. That should allow the remaining 90% to be shared out amongst shareholders. This would likely be in a series of payments over a number of years. A proposal regarding a change of category shares to ensure the benefits of this could be passed down to family members would be a likely possibility. We would envisage that members could enjoy a financial benefit of a six-figure sum, proportionate to their membership subscription.

We will need to engage professional help to establish the tax position of the company following a land sale. Should the distribution of income or perhaps shares to members occur then it will be up to individuals to seek their own advice to establish their personal liabilities, but we will seek advice on behalf of the membership on how this should be treated in principle. The club will bear this cost.

Many of you will want further details but as we said we are bound by confidentiality at this time. We have exhausted many avenues of enquiry and to go back over everything, given the timeframe we have for this opportunity, will be damaging.

## The Board's Recommendations

Whilst we all enjoy playing golf at Reading, as directors we have a legal duty to set the company's strategic aims, provide the leadership to put them into effect and supervise the management of the business. Our actions are subject to laws, regulations and the shareholders.

We believe, armed with all the information we have, that the best future for Reading Golf Club Ltd and all of the club's members is to create a masterplan around options 2 & 3, which would include the sale of land for a structured and quality development and to relocate the club to a site to offer vastly improved and additional facilities - a club for the future.

Most organisations who contacted us are very reluctant to engage in serious discussion with member-run golf clubs because of the set-up of the committee structure and the voting policies inherent in most clubs. At best we have been allowed a maximum of three representatives at meetings, sometimes fewer. At worst we have been, and still are, bound by confidentiality agreements.

As mentioned previously, please remember we are still covered in many areas by confidentiality. Divulging fine detail and elements of information received could well be damaging at this stage. Golf clubs notoriously have become embroiled in political debate where understandably sentiment has dictated the agenda, but we cannot afford for this to happen here.

We are advised that this is a "once in a lifetime opportunity" with regards to planning and our investigations concur with that. The window of opportunity, however, is small.



## The Way Forward

To engage the members at every step of our investigation would be too time consuming and difficult. To develop a strategy with 500 different thoughts on various scenarios as they arise is also not an option and the confidentiality requested makes that impossible.

However, we do seek the members' approval now on the way to go forward. We will support a question and answer session after the AGM on Friday evening. Written questions prior to Friday would be appreciated. Again, please be aware that some answers may not be provided for confidentiality reasons.

We encourage all shareholders to support the Board's investigation to re-locate the club. You have the opportunity to agree or disagree and provide comments by following the link. <http://www.readinggolfclub.com/comments2018/>. This link will be available until 5pm on Tuesday 6<sup>th</sup> February. Once your views have been collated, the Board can proceed with its work for the members.

Should the majority agree with the Board's recommendation, then we would hope to report back in more detail of the chosen option for the continued future and success of the club within the next 4 months.

Colin Reed

Chairman and on behalf of the Directors of Reading Golf Club Ltd

EVERITT, NICHOLAS

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**From:** Everitt, Nicholas  
**Sent:** 26 January 2018 18:09  
**To:** Planning Policy  
**Subject:** Draft Local Plan Section EN7N Item EN7Nn - EFA proposal for The Heights school on Mapledurham Playing Fields

**This is an EXTERNAL EMAIL. STOP. THINK before you CLICK links or OPEN attachments.**

As a Caversham resident I feel compelled to register my objections to the EFA proposal to build The Heights Primary School on Mapledurham Playing Fields – Land held in Trust for recreational use. Not educational use.

Throughout the process I have been alarmed and at times baffled by the RBC's approach to this matter. As a parent of two primary school age children, I'm all too aware of the pressure on places which built up over the last 5 years. However, it seems obvious that this pressure was a result of a longer term failure in planning, and particularly in the Caversham area, the building of a large development of family homes on Bugs Bottom with no corresponding local infrastructure, i.e. a school. I would like to know how this came about.

It is also obvious that the vast majority of the potential future and current intake for The Heights will live in the Caversham Heights area to the East of the A4074. A very small proportion of the intake will live on the West of the A4074, meaning that children will have to cross a busy road at the busiest time of day. The end results will be very predictable, particularly given the inadequate road alterations proposed. Those children who do walk to school will face unnecessary danger, and more parents will take to their cars to transport their children to and from school, thus further compounding the traffic management issues we see on the A4074 at peak times. The modelling suggesting relatively high rates of journeys to and from school on foot just are not plausible. In the real world, busy parents will have no choice but to make journeys by car.

I would dearly love to understand how the EFA proposal can be reconciled with RBC's commitment to open, green spaces for the benefit of local residents. This proposal will remove exactly that thing, replacing it with a school in the wrong part of Caversham, creating a highly questionable future for the Pavilion, and opening the door to future development of land held in Trust specifically for recreational use.

It really does not reflect well on RBC.

Nick Everitt

Click [here](#) to report this email as spam.

FAREY, JULIA AND STEVE

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**From:** Julia Farey  
**Sent:** 24 January 2018 18:52  
**To:** Planning Policy  
**Subject:** Re: Site A19 : Part of Reading Golf Course, Kidmore End Road

This is an EXTERNAL EMAIL. STOP. THINK before you CLICK links or OPEN attachments.

Dear Sirs,

A19a - Suggestion

With reference to the Residential and new clubhouse and suggestion of 100 dwellings, using plan densities approx 85-134 dwellings we would to register our opposition to this and any further development of Reading Golf Course due to the impact on the environment and further pressure on the already densely populated area of Emmer Green.

Road congestion at current levels are already causing major concerns in this area. Our current infrastructure is struggling to meet present demand, without adding all of the above.

Additional housing, additional people and additional motor vehicles will increase admissions still further and the loss of open land will be gone forever. Not withstanding the effect on our wildlife, trees, shrubbery and open space that we need to maintain as a human race.

We are gravely concerned not only about the present but the future of this area. It is beholden on all of us to protect our environment for the future generations.

Yours sincerely,

Julia and Steve Farey

## F.C.C. ENVIRONMENT

Please return by Friday 26<sup>th</sup> January 2018 to: Planning Policy, Civic Offices,  
 Bridge Street, Reading, RG1 2LU or email [planningpolicy@reading.gov.uk](mailto:planningpolicy@reading.gov.uk)

**PART A - YOUR DETAILS**

**Personal Details**

**Agent's Details** *(if applicable)*

<b>Title</b>	Mr	<b>Mr</b>
<b>First Name</b>	David	<b>James</b>
<b>Last Name</b>	Molland	<b>Cook</b>
<b>Job Title</b> <i>(if applicable)</i>		
<b>Organisation</b> <i>(if applicable)</i>	FCC Environment	<b>Sirius Planning</b>
<b>Address 1</b>		<b>4245 Park Approach</b>
<b>Address 2</b>		<b>Thorpe Park</b>
<b>Address 3</b>		
<b>Town</b>		<b>Leeds</b>
<b>Post Code</b>		<b>LS15 8GB</b>
<b>Telephone</b>		<b>0113 264 9960</b>
<b>E-mail</b>		<b>James.Cook@thesiriusgroup.com</b>

**PART B - YOUR REPRESENTATION** (please use a separate form for each representation)

**B1. To which part of the Local Plan does this representation relate?**

Policy SR1a: Former Landfill Island Road

**B2. Do you consider that the Local Plan:** (please tick as appropriate)

Is legally compliant?

Yes

No

Is sound?

Yes

No

Fulfils the duty to co-operate?

Yes

No

**B3. Please provide details of why you think the Local Plan, or part of the plan, is or is not legally compliant, sound and/or complies with the duty to co-operate.**

It is considered that the policy is sound as it provides for bringing underused/potentially despoilt land back in a positive use whilst meeting a need for employment land in the area. Having an industrial and commercial designation on land adjoining the existing recycling facility will limit the potential for any amenity concerns and also provides opportunities should the existing facility wish to expand. Thus helping to provide enhanced resource management facilities in accordance with the waste hierarchy.

*Please continue on another sheet if necessary*



**B4. Please set out the modifications that you think would make the Local Plan, or part of the plan, legally compliant and/or sound. Please provide specific wording where possible.**

It is agreed that industrial proposals should be located towards the northern boundary of the designation. But draft Policy SR1a should recognise the need for existing businesses to expand in the future, especially given the levels of growth/development allowed for by the Local Plan. Therefore the following wording should be included in the last sentence of the draft policy

“Development should be considered as a comprehensive whole but also respect the future needs of existing businesses.”

*Please continue on another sheet if necessary*

**B5. If you are seeking a modification to the plan, do you wish to appear in person at the public examination?**

Yes  No

**B6. If you wish to appear in person, please briefly outline why you consider this necessary.**

To ensure that the future interests of FCC Environment and the services it provides to Reading and the surrounding area are adequately protected.

**B7. Do you wish to be kept informed of planning policy matters?**

(please tick as appropriate)

Please keep me informed of the progress of this Local Plan:

Please keep me informed of all planning policy matters:

## FESTIVAL REPUBLIC



**BLANDY & BLANDY**  
solicitors

**Reading Borough Council**  
**Pre- Submission Draft Reading Borough Local Plan**

**Representation on behalf of Festival Republic in respect of proposed policy WR4: Potential Traveller Transit Site at Cow Lane**

This representation is made on behalf of Festival Republic in respect of the annual Reading Festival which is undertaken by our client Festival Republic.

Festival Republic are strongly opposed to the proposed identification of land at Cow Lane for a traveller transit site. Our clients were extremely disappointed to note that notwithstanding the representations made on their behalf on 16 October 2017 regarding the gypsy and traveller consultation document the Borough Council has proposed the policy in the most recent iteration of the Local Plan. A copy of those representations which still stand is attached. Paragraph 2.3 of the Consultation Document indicates that if following the consultation the site is “considered suitable for transit provision” it “would potentially” be included in the Pre-Submission Draft Local. There has been no indication of any evaluation of the consultation responses and (particularly in the light of our client’s representations) no justification for inclusion of the proposed policy has been given.

**General**

It is of course noted that the policy as drafted makes it clear that:

“any proposed development for transit accommodation should:...

- Not have significant adverse effects on existing operations in particular the Reading Festival...”

The acknowledgment of the importance of Reading Festival in paragraph 7.3.21 of the Pre-Submission Draft is welcomed. It is appreciated that the Borough Council recognises that the Festival is a “major asset” and that any proposal must “ensure that the ability of the Festival to operate will

not be threatened” but Festival Republic’s position is that that cannot in practice be achieved. There will inevitably be “significant adverse effects” on the operation of the Reading Festival. The reality is that if Cow Lane becomes a transit site the Festival cannot place. The site at Cow Lane should not therefore be allocated.

## **Reasons**

There are a number of reasons why the proposed site is unsuitable as a transit site for travellers and in particular why the proposed development would have a dramatically adverse impact upon the whole of the festival operation. Those include:

- The site is part of the centre of operations for the entirety of the Festival organisation throughout the 6-8 weeks when the festival site is being prepared and then taken down
- The access to the site (the Blue Gate – at the south end of Cow Lane) is the main access for all supplies and construction materials. It is the only access suitable for high vehicles which are required for construction purposes. It is essential that the Festival has absolute control of the Blue Gate from the start to the finish of the 6-8 week period.
- The main stage is on land owned by Festival Republic immediately to the west of the footpath in Cow Lane. Behind the stage is the backstage area and where portable cabins used as offices throughout the festival are located. Immediately across Cow Lane to the east is the proposed site area. For many years this area has been used for security, counter terrorism checks, catering, broadcasting and other communications and emergency vehicles.
- The northern strip of the proposed site adjacent to the existing ditch is used as a direct exit route from the arena onto Richfield Avenue for up to 20,000 day visitors.
- For the smooth operation of the Festival organisers need absolute control of the areas in which they operate. A transit site in the heart of the operation would deny the operators, the police and other services the necessary control and compromise any counter-terrorism checking that currently takes place at the entry point.

The site is required for 6-8 weeks from the end of July to the beginning of September. There are three main vehicle access points to the main Festival site, Blue Gate, Orange Gate and Yellow Gate. Blue gate is the only access which is in practice suitable for use by high vehicles. It is directly off Richfield Avenue and is the only appropriate access for production and artist arrivals and for setting up and closing down as well as supplies during the whole 6-8 week period. Further the Blue Gate provides the best available access to the whole of the festival complex.

As the Borough Council is aware the event has capacity (and licence) for 99,999 people (for the 2018 event). The main stage is located in the optimum position to accommodate festival goers and manage noise. The core of the operation needs to be proximate to the backstage area and offices. The area has been used over a number of years for various administrative requirements including security control, counter-terrorism checking of personnel (those employed at the site and others as necessary) communications (the BBC has its own compound within the site) other organisations and catering for personnel/staff working on the site. The chosen site therefore functions as part of the nerve centre of the whole festival operation.

The strip of land immediately to the south of ditch and within the identified site is used to enable safe and speedy egress from the arena through the site for day visitors heading back into Reading and/or to the main railway station. It is not used for access but enables visitors to leave the arena as swiftly as practicable directly onto Richfield Avenue and to follow the public highways network from there. The route has been agreed with the Borough Council and the police who arrange for the road to be closed to facilitate egress for such visitors.

Attached to this representation is an aerial photo demonstrating something of the strategic location and impact of the proposed site and a plan which has been prepared to illustrate the proximity of actual uses undertaken on the potential site to the stage and backstage areas.

Over the years the Reading Festival organisers have worked hard to agree and to refine practical arrangements for the various operations with the Borough Council, the police, emergency services, suppliers, broadcasters as well of course as visitors to the Festival itself. The allocation of the heart of the operation for another use would seriously disrupt the existing arrangements which are known to and accepted by the key stakeholders. Such disruption would endanger the smooth running of the event.

As will be apparent and is already known to the Borough Council, the organisers of the festival need to have control of the whole of the festival site. It is inconsistent with that need for control for a third party to be in the middle of the operations. The organisers would of course have no control over any third party which would have rights of access and egress conflicting with the needs of the festival.

## **Possible Alternative Sites**

Paragraph 7.3.20 of the pre-submission draft asserts that the Cow Lane site “is considered to be the only location in Reading where transit needs could potentially be met”. That is with respect an extreme proposition.

Our clients made representations on the Gypsy and Traveller Consultation Document (September 2017) on 16 October 2017. The September document identified 80 or so sites owned by the Council that were considered. At the end of Annex 1 of the consultation document there is the comment:

“The reasons for rejections set out above are not necessarily the only reason why a particular site is considered unsuitable. Once a site had been excluded for robust reasons, there was not considered to be any need to identify further issues”.

A number of sites are rejected on the basis on visual amenity. Others are rejected on the basis that the land is required for other use – e.g. continued use as a car park. There is no evidence of why the various reasons are considered “robust”. In particular there are a number of parcels of land where the only reason is “visual amenity” but nothing to demonstrate the robustness of the assertion.

The final bullet point in draft policy WR4 requires “a strong landscape buffer”. Landscaping is anticipated. It must be possible to make appropriate landscaping provision even where in the case of other possible sites there may be a potential adverse impact on visual amenity. There are a number of sites - e.g. within the South Reading area - that could be reconsidered if it is considered that provision must be made for a travellers’ transit site within the Borough.

## **Reading Festival – The Importance to Reading**

The recognition of the importance of the Festival to Reading as a “major asset to the town” is welcomed. As indicated in Festival Republic’s response to the consultation draft the most recent economic impact assessment indicated that the Festival generates approximately £20 million into the local economy with a further £20 million into the wider UK economy. It is therefore a major economic driver.

Reading has become well known internationally for the Festival and in some parts of the world Reading is known more for its Festival than for any of its other significant achievements.

## **Summary**

The objective contained within the draft policy itself that the proposed development should “not have any significant adverse effects on the existing operations (in particular the Reading Festival) cannot be achieved. It is either the transit site or the Festival.

The allocation of the site should be rejected.

**Simon Dimmick**

**Blandy & Blandy LLP**

**25 January 2018**

Please return by Friday 26<sup>th</sup> January 2018 to: Planning Policy, Civic Offices,  
 Bridge Street, Reading, RG1 2LU or email [planningpolicy@reading.gov.uk](mailto:planningpolicy@reading.gov.uk)

**PART A - YOUR DETAILS**

	<b>Personal Details</b>	<b>Agent's Details</b> <i>(if applicable)</i>
<b>Title</b>		<b>Mr</b>
<b>First Name</b>	<b>Festival Republic Limited</b>	<b>Simon</b>
<b>Last Name</b>		<b>Dimmick</b>
<b>Job Title</b> <i>(if applicable)</i>		<b>Partner</b>
<b>Organisation</b> <i>(if applicable)</i>	<b>Festival Republic Limited</b>	<b>Blandy &amp; Blandy LLP</b>
<b>Address 1</b>	<b>2<sup>nd</sup> Floor Regent Arcade House</b>	<b>1 Friar Street</b>
<b>Address 2</b>	<b>18-25 Argyll Street</b>	
<b>Address 3</b>		
<b>Town</b>	<b>London</b>	<b>Reading</b>
<b>Post Code</b>	<b>W1F 7TS</b>	<b>RG1 1DA</b>
<b>Telephone</b>		<b>0118 951 6800</b>
<b>E-mail</b>		<b>simon.dimmick@blandy.co.uk</b>



**PART B - YOUR REPRESENTATION** (please use a separate form for each representation)

**B1. To which part of the Local Plan does this representation relate?**

Proposed policy WR4

**B2. Do you consider that the Local Plan:** (please tick as appropriate)

Is legally compliant?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Is sound?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
Fulfils the duty to co-operate?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

**B3. Please provide details of why you think the Local Plan, or part of the plan, is or is not legally compliant, sound and/or complies with the duty to co-operate.**

The identification of the Traveller Transit Site at Cow Lane has not been justified. As such the plan cannot be sound.

Other sites that could potentially meet the needs of travellers exist but have been dismissed without any evidence as to why. The proposed policy was inserted in the draft plan in November 2017 without any indication of the evaluation of the consultation responses submitted in October 2017.

No real account or evaluation has been taken as to the economic and cultural impact on Reading of the Reading Festival not taking place.

*Please continue on another sheet if necessary*

**B4. Please set out the modifications that you think would make the Local Plan, or part of the plan, legally compliant and/or sound. Please provide specific wording where possible.**

Delete proposed policy WR4.

*Please continue on another sheet if necessary*

**B5. If you are seeking a modification to the plan, do you wish to appear in person at the public examination?**

Yes  No

**B6. If you wish to appear in person, please briefly outline why you consider this necessary.**

To ensure the serious implications of the proposal as outlined in the attached representation are understood fully and to answer any questions the Inspector may have.

**B7. Do you wish to be kept informed of planning policy matters?**

(please tick as appropriate)

Please keep me informed of the progress of this Local Plan:

Please keep me informed of all planning policy matters:

12

C28

McCaddilly Circus

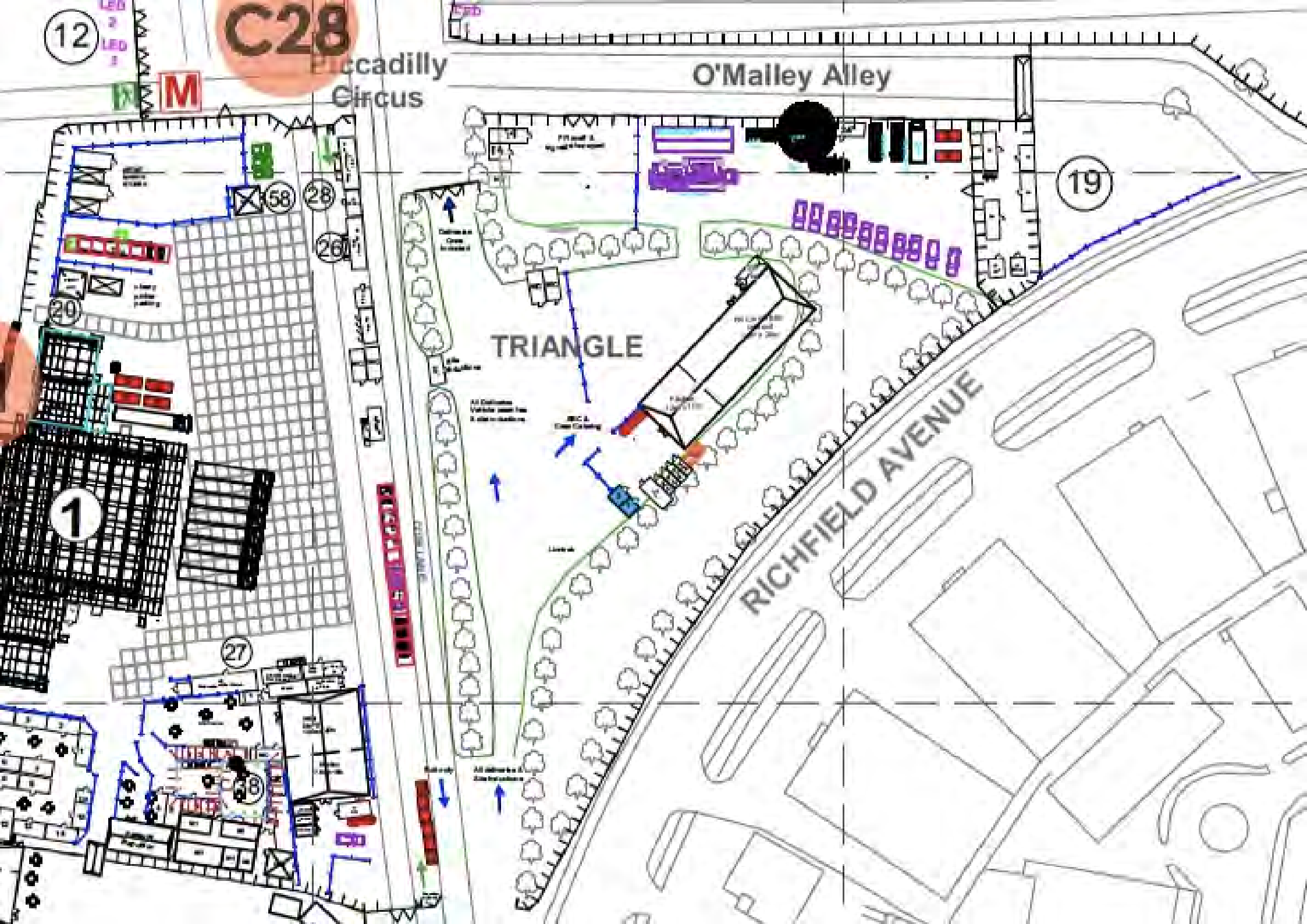
O'Malley Alley

M

19

TRIANGLE

RICHFIELD AVENUE







GYPSY AND TRAVELLER PROVISION  
CONSULTATION DOCUMENT (2017)

RESPONSE ON BEHALF OF FESTIVAL REPUBLIC

We are instructed by Festival Republic.

Festival Republic run, inter alia, the Reading Festival (“the Festival”).

Festival Republic object strongly to the proposal by Reading Borough Council (“the Council”) to promote and allocate in the new Local Plan a gypsy and traveller transit site on land identified at the junction of Richfield Avenue and Cow Lane (“the Site”).

Although Festival Republic might accept there is an unmet need for a gypsy and traveller transit site within the Borough, Festival Republic do not accept that it would be appropriate, or possible, for the need identified by the Council to be met on the Site.

The Council have produced a basic sketch layout. The sketch shows that as a minimum a site would need to be around 0.15ha to accommodate five transit pitches. Whilst the Site would appear to be larger than the amount of land needed, Festival Republic’s objection to what is proposed, which is based on the severe adverse impact the proposal has on Festival Republic’s operation of the Festival, would apply equally to a smaller site on land used annually in connection with the Festival.

The Council say it has considered eighty potential sites. Out of the eighty sites considered the Council has concluded that only the Site has the potential to meet the identified need. Ultimately, therefore, if the Site is rejected it may not be possible for the Council to address the identified need within the Borough. However, that fact cannot be allowed to detract from the reality that the Site should not be allocated, or from the fact that if a site must be allocated within the Borough, an alternative site should be allocated in preference to the Site.

Festival Republic note, for example, that site 2, which is the Rivermead overflow parking areas are rejected because they are required for continued use as a car park; albeit Festival Republic believe the need for overflow parking has only ever arises in connection with the Festival. Whilst, and for that reason, Festival Republic would not support the use of the Rivermead overflow parking area to provide a gypsy and traveller site, the same reasoning applies equally, if not more so, to the Site.



Indeed, the Council must be aware that during the Festival, and the Festival has now run for circa 40 years, the Festival operator, now Festival Republic, take over and fully utilise both the Site and the Rivermead overflow parking; the only difference being that The Site is used in connection with the Festival for a significantly longer period of time.

Besides site 2, and Festival Republic would reiterate that the reference to site 2 above is made merely to emphasise the inconsistency between the rejection of that site and the continued promotion of the Site, Festival Republic also note that other potential sites, for example sites 14,18,19,36,41,46,48,56,62,64,66,67,68,69,71 and 72, have only been rejected on grounds of apparent residential and/or visual amenity. It is not clear, however, why that should be the case and more significantly what weight has been applied to those consideration in reaching that conclusion, compared to the weight applied to the obvious, not potential, serious adverse impact the allocation would have on the continued functioning of the Festival.

The importance of the Festival to Reading is obvious. The Festival, which has now run for circa 40 years, is one of the largest in the UK. Besides helping to raise the profile of Reading, the Festival puts circa £20 million directly into the local economy and an additional circa £20 million into the wider UK economy. These facts are known and documented and anything that would put the future of the Festival at risk is not, we would suggest, something that should be advocated.

The area of land identified as site 1 i.e. the Site forms an integral and essential part of the Festival venue. Indeed, it is an essential part of the backstage area. Specifically, and being immediately behind the main stage, the land is used intensively before the Festival proper begins, during the Festival itself and after the Festival proper has ended. It is used by the BBC. It is used by on-site catering. It is used for the induction of staff. It is used as a direct route for on-site communication and security and It is also used to unload, and re-load equipment. Further, and importantly, the Site is used as the principal point of exit for circa 20,000 day-ticket holders on each of the three concert dates. An aerial photograph showing the Site in use forms Appendix 1. What is important to note, however, is that the Site is not just used on the three days of the main concert event, or on just the five days of the associated camping. Indeed, it is important to note that the Site is used intensively for circa 7 weeks of the year in the lead-up to and take down of the Festival. In short, the Site, and the land adjoining it, are essential to the safe, secure and proper organisation of the Festival and the loss of the Site would have very serious implications for the continued safe and successful operation of the Festival. Further, the activities that take place on the Site cannot, for logistical reasons and for reasons of space, take place elsewhere. In short, the uses that take place on the Site take place where they do because that is where they need to take place. Moving the uses and functions to another location is not an option.

Festival Republic cannot believe the Council would want to bring into question the safe and efficient organisation of the Festival. The Festival attracts circa 100,000 people. On whatever basis it is judged the Festival is a major event. All such events face a heightened threat from terrorism. The Festival is no exception and conscious of that threat Festival Republic do all within their power to minimise that threat and genuinely believe that the introduction of a transit site within the cordon they are

currently able to create and control could affect not only the efficient operation of the Festival, but also its' safety.

The Consultation Document (September 2017), to which Festival Republic are responding, acknowledges, under the heading "Availability", that the Site is :-"used in part for Festival, which would need to be addressed." The Site, however, is not used "in part". The Site is, as can be seen from Appendix 1, used completely and intensively for operations central to the organisation and running of the Festival. To be clear, and even if this reference is a reference to a time period, as opposed to a physical area, the Site is not used for just the 3 days of the Festival proper, but intensively for circa 7 weeks of the year. Whilst it is disappointing, and regrettable, that the Council decided to issue the Consultation Document without having first taken the opportunity to discuss matters with Festival Republic, it is not immediately obvious to Festival Republic how the issues of the Site's use by the Festival can be "addressed". Specifically, and unless the Festival's exclusive use of the Site between July and September, inclusive, can be guaranteed i.e. unless there was no transit site on the Site between July and September inclusive, it is impossible to see how the issue can be addressed.

On the above basis, and without prejudice to other arguments Festival Republic may make if the allocation is taken forward, Festival Republic firmly believe that if the Council remain determined to meet the identified need within the Borough, the Council must re-visit the availability of alternative sites in the light of the impact a transit site would, undoubtedly, have on the efficient and safe operation of the Festival.

Dated 16<sup>th</sup> October 2017

Eminence Grise Limited Solicitors

For and on behalf of Festival Republic

FRASER-HARDING, KATHLEEN



---

**From:** Kathleen Fraser-Harding  
**Sent:** 23 January 2018 22:00  
**To:** Planning Policy  
**Subject:** Local Plan Section EN7N

This is an EXTERNAL EMAIL. STOP. THINK before you CLICK links or OPEN attachments.

Item EN7Nn.....

I still can't understand why Mapledurham Playing Fields is still been looked at to build on. It is outrageous that an open space that was left in trust to the whole community is even being thought about for such a project.

I would like to know:

1. Why is the current Local Plan being ignored in favour of RBC supporting the ESFA's proposals to build a school on Mapledurham Playing Fields, which is designated green open space and held in trust exclusively for recreation?
2. How will the new local plan be strengthened to overcome future threats to green open space, especially when it is held in trust?
3. In particular how will it safeguard against the following factors, which cannot be mitigated and will significantly impact Mapledurham Playing Fields, if the EFSA proposal is implemented:
  - A) Traffic movements
  - B) Air pollution
  - C) Noise pollution
  - D) Visual dominance and overbearing on the area of the site where they propose to build.
  - E) Privacy
  - F) Out of character with local residents properties
  - G) Light pollution
  - H) Impact to other users i.e. tennis club (which I am a member), dog walkers, footballers, casual visitors
  - I) Hours of operation
  - J) Reduction to the quality of the environment
4. What plans are there to demonstrate commitment to the current local plan and protect Mapledurham Playing Fields from the threat of the ESFA proposal?

Very concerned local resident  
Kathleen Fraser-Harding

FRASER-HARDING, TIM

---

**From:** Fraser-Harding, Tim  
**Sent:** 26 January 2018 23:18  
**To:** Planning Policy  
**Subject:** Local Plan Section EN7N Item EN7Nn

**This is an EXTERNAL EMAIL. STOP. THINK before you CLICK links or OPEN attachments.**

Item EN7Nn.....

I still can't understand why Mapledurham Playing Fields is still been looked at to build on. It is outrageous that an open space that was left in trust to the whole community is even being thought about for such a project.

I would like to know:

1. Why is the current Local Plan being ignored in favour of RBC supporting the ESFA's proposals to build a school on Mapledurham Playing Fields, which is designated green open space and held in trust exclusively for recreation?
2. How will the new local plan be strengthened to overcome future threats to green open space, especially when it is held in trust?
3. In particular how will it safeguard against the following factors, which cannot be mitigated and will significantly impact Mapledurham Playing Fields, if the EFSA proposal is implemented:
  - A) Traffic movements
  - B) Air pollution
  - C) Noise pollution
  - D) Visual dominance and overbearing on the area of the site where they propose to build.
  - E) Privacy
  - F) Out of character with local residents properties
  - G) Light pollution
  - H) Impact to other users i.e. tennis club (which I am a member), dog walkers, footballers, casual visitors
  - I) Hours of operation
  - J) Reduction to the quality of the environment
4. What plans are there to demonstrate commitment to the current local plan and protect Mapledurham Playing Fields from the threat of the ESFA proposal?

Very concerned local  
resident Tim Fraser-Harding

Click [here](#) to report this email as spam.

GILLOTTS SCHOOL

Please return by Friday 26<sup>th</sup> January 2018 to: Planning Policy, Civic Offices,  
 Bridge Street, Reading, RG1 2LU or email [planningpolicy@reading.gov.uk](mailto:planningpolicy@reading.gov.uk)

**PART A - YOUR DETAILS**

	Personal Details	Agent's Details <i>(if applicable)</i>
Title	Ms	
First Name	Catharine	
Last Name	Darnton	
Job Title <i>(if applicable)</i>	Headteacher	
Organisation <i>(if applicable)</i>	Gillotts School	
Address 1	Gillotts Lane	
Address 2		
Address 3		
Town	Henley-on-Thames	
Post Code	RG9 1PS	
Telephone	01491 636807	
E-mail	cdarnton@gillotts.org.uk	

**PART B - YOUR REPRESENTATION** (please use a separate form for each representation)

**B1. To which part of the Local Plan does this representation relate?**

Educational provision  
Specifically 4.7.6, and the Infrastructure Delivery Plan (within the Draft Local Plan), and the separate Infrastructure Delivery Plan (p32)

**B2. Do you consider that the Local Plan:** (please tick as appropriate)

Is legally compliant?	Yes	<input checked="" type="checkbox"/>		No	<input type="checkbox"/>
Is sound?	Yes	<input checked="" type="checkbox"/>		No	<input type="checkbox"/>
Fulfils the duty to co-operate?	Yes	<input type="checkbox"/>		No	<input checked="" type="checkbox"/>

**B3. Please provide details of why you think the Local Plan, or part of the plan, is or is not legally compliant, sound and/or complies with the duty to co-operate.**

On page 32 of the Infrastructure Delivery Plan, it states that 38% of the Borough’s secondary pupils cross the Borough’s boundaries to attend school in surrounding authorities. In 4.7.6, it is identified that a new 6 form entry secondary school is required and in the Infrastructure Delivery Plan, it states the need in addition for the expansion of existing schools to provide 3 additional forms of entry.

No pupil place planning data is provided in the plan, and there is no evidence of any cooperation with neighbouring Local Authorities or Academies. Through our own work with RBC, it seems likely that if such an expansion in school places occurs, there is a significant potential for the amount of cross border movement to reduce and so render schools in other Authorities unviable.

In addition, given the physical barrier of the River Thames, the location of the new school and the existing schools that will be expanded are crucial to understand the impact on schools in neighbouring authorities.

For example, if the new school were to be situated north of the river, it would be likely that one (or more) of the three south-east-Oxfordshire secondary schools (Chiltern Edge- Sonning Common, Gillotts - Henley-on-Thames, Langtree - Woodcote) would become unviable. This is because rolls are falling in the primaries that feed all three secondary schools. Our own modelling, using data provided by OCC, suggests that, even when housing growth is accounted for, there will be significant surplus places across the three schools if they do not also admit pupils from outside Oxfordshire:

Year of transfer	2018	2019	2020	2021	2022	2023
Total surplus places in SE Oxon	146	76	129	89	105	106

The Local Plan (4.7.6) states that a new secondary school would “ideally be located close to the town centre”. The word “ideally” is insufficient and should be strengthened as locating the school in north Reading would be:

- (a) detrimental to south-east Oxfordshire schools (meaning the Plan does not fulfil the duty to co-operate),  
and/or
- (b) fail to provide sufficient capacity for Reading’s needs, as the vast majority of houses will be built south of the River (see 8.2.3) (meaning the Plan is not adequately planning for sufficient infrastructure),  
and/or
- (c) worsen traffic if Reading pupils have to be transported across the River (meaning the Plan is not sustainable).

*Please continue on another sheet if necessary*

**B4. Please set out the modifications that you think would make the Local Plan, or part of the plan, legally compliant and/or sound. Please provide specific wording where possible.**

Pupil place planning needs to be undertaken with all the neighbouring Local Authorities to establish accurately:

- (a) The need for new secondary provision
- (b) The location of the secondary provision to meet this need
- (c) The impact on existing secondary provision in neighbouring Local Authorities

It is not possible to suggest accurate replacement wording for 4.7.6 and the Infrastructure Delivery Plan (within the Draft Local Plan), and the separate Infrastructure Delivery Plan (p32), until the pupil place planning has been completed and the potential locations of additional secondary provision identified.

*Please continue on another sheet if necessary*

**B5. If you are seeking a modification to the plan, do you wish to appear in person at the public examination?**

Yes

No

**B6. If you wish to appear in person, please briefly outline why you consider this necessary.**

**B7. Do you wish to be kept informed of planning policy matters?**  
(please tick as appropriate)

Please keep me informed of the progress of this Local Plan:

Please keep me informed of all planning policy matters:



GLADMAN DEVELOPMENTS LTD

Please return by Friday 26<sup>th</sup> January 2018 to: Planning Policy, Civic Offices,  
 Bridge Street, Reading, RG1 2LU or email [planningpolicy@reading.gov.uk](mailto:planningpolicy@reading.gov.uk)

**PART A - YOUR DETAILS**

	Personal Details	Agent's Details <i>(if applicable)</i>
Title	Mr	
First Name	Richard	
Last Name	Crosthwaite	
Job Title <i>(if applicable)</i>	Planning Policy Manager	
Organisation <i>(if applicable)</i>	Gladman Developments Limited	
Address 1	Gladman House	
Address 2	Alexandria Way	
Address 3		
Town	Congleton	
Post Code	CW12 1LB	
Telephone	01260 285649	
E-mail	r.crosthwaite@gladman.co.uk	

**PART B - YOUR REPRESENTATION** (please use a separate form for each representation)

**B1. To which part of the Local Plan does this representation relate?**

See attached document

**B2. Do you consider that the Local Plan:** (please tick as appropriate)

Is legally compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Is sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Fulfils the duty to co-operate?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

**B3. Please provide details of why you think the Local Plan, or part of the plan, is or is not legally compliant, sound and/or complies with the duty to co-operate.**

See summary table in attached document

*Please continue on another sheet if necessary*

**B4. Please set out the modifications that you think would make the Local Plan, or part of the plan, legally compliant and/or sound. Please provide specific wording where possible.**

See attached document

*Please continue on another sheet if necessary*

**B5. If you are seeking a modification to the plan, do you wish to appear in person at the public examination?**

Yes  No

**B6. If you wish to appear in person, please briefly outline why you consider this necessary.**

See attached document

**B7. Do you wish to be kept informed of planning policy matters?**

(please tick as appropriate)

Please keep me informed of the progress of this Local Plan:

Please keep me informed of all planning policy matters:

**Pre- Submission Draft Reading Borough Local Plan  
Local Plan**

**Regulation 19 Consultation, November 2017**



**January 2018**



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Appendix 1- Land off Peppard Road, Emmer Green

# 1 INTRODUCTION

## 1.1 Context

1.1.1 Gladman Developments Ltd. (Gladman) specialise in the promotion of strategic land for residential development with associated community infrastructure. This submission sets out representations from Gladman on the Draft Reading Borough Local Plan, which has been issued in draft form for consultation between 30<sup>th</sup> November 2017 and 26<sup>th</sup> January 2017. Gladman welcome the opportunity to comment on the emerging Local Plan and are keen to be involved in the plan making process as it reaches its examination stage.

1.1.2 Gladman note that this Pre-Submission Reading Borough Local Plan sets out the proposed strategy for growth and development up to 2036, together with land use allocations and key policies.

## 1.2 Structure of Representations

1.2.1 These representations are structured to follow the Council's consultation document that was published on 30<sup>th</sup> November 2017 and will cover the following key topic areas:

- National Planning Policy
- Legal Compliance
- Objectively Assessed Housing Needs
- Draft policies of the Reading Borough Local Plan
- Housing White Paper

1.2.2 This response to the consultation also makes reference to a proposed site for residential development:

- Land off Peppard Road, Emmer Green

1.2.3 Whilst this site sits outside of the Reading administrative area and within South Oxfordshire District, given the tightly constrained urban nature of Reading Borough, it is vital that sustainable locations for growth alongside the urban area are thoroughly considered under the duty to cooperate and the plan making process. Indeed, the Local Plan should seek to ensure that the development needs of Reading are met in full in locations that are in proximity to where they arise. This will require cross boundary working with all neighbouring authorities, recognising that the geography of housing market areas overlap along the northern fringes of Reading.

1.2.4 Further details for this site can be found within these representations and at Appendix 1.



1.2.5 The Framework sets out four tests that must be met for Local Plans to be considered sound. These tests should form a key consideration during the preparation of the Local Plan and its supporting evidence base:

- **Positively Prepared** – The Plan should be prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.
- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base.
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with National Policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

1.2.6 Gladman requests that it is given the opportunity to discuss the objections contained within these representations at the Examination in Public. A summary of the main issues and concerns raised in relation to the Plan are summarised in Table 1 below:

Table 1 – Summary of soundness issues and concerns

Policy / issue	Sound/Unsound	Test of Soundness	Reason	Evidence
Duty to Co-operate	N/A	N/A	The ability to meet OAN in full must be fully considered and addressed	Pre-Submission Local Plan NPPF
Objectively Assessed Housing Need	unsound	Positively Prepared Justified Effective Consistent with National Policy	Affordability issues must be considered through the local plan  The ability to meet OAN in full must be fully considered and addressed	Pre-Submission Local Plan SHMA Housing and Economic Land Availability Assessment Housing Implementation Strategy
Policy H1: Provision of Housing	unsound	Positively Prepared Justified	The Policy fails to set out how OAN will be delivered in	NPPF

		Effective Consistent with National Policy	full over the plan period whilst maintaining a rolling 5 year housing land supply through the provision of adequate contingencies	PPG  Housing and Economic Land Availability Assessment  Housing Implementation Strategy
Policy H3: Affordable Housing	unsound	Justified Consistent with National Policy	There is no evidence available to justify the proposed policy	Viability Study  NPPF  PPG
Policy H5: Standards for New Housing	unsound	Justified Consistent with National Policy	There is no evidence available to justify the proposed policy	Viability Study  NPPF PPG
Policy EN13: Major Landscape Features and AONB	unsound	Positively Prepared Justified Consistent with National Policy	The proposed policy must be justified and consistent with Section 11 of the NPPF	Landscape Assessments  NPPF
Policy CA1: Sites for Development and Change of Use in Caversham and Emmer Green	unsound	Positively prepared Justified Consistent with National Policy	Policies relating to Emmer Green should recognise the sustainable nature of the area and the opportunities that exist for development beyond the administrative boundary of Reading to support the further sustainable development of these areas.	NPPF
Policy RL1: Network and Hierarchy of Centres	sound	Consistent with National Policy	Gladman supports the establishment of the hierarchy of centres and in particular the recognition that Emmer Green is an established District Centre within this hierarchy.	Pre-Submission Local Plan

## 2 NATIONAL PLANNING POLICY

### 2.1 National Planning Policy Framework and Planning Practice Guidance

2.1.1 The National Planning Policy Framework has been with us now for five years and the development industry has experience with its application and the fundamental changes it has brought about in relation to the way the planning system functions. The Framework sets out the Government's goal to 'significantly boost the supply of housing' and how this should be reflected through the preparation of Local Plans. In this regard, it sets out specific guidance that local planning authorities must take into account when identifying and meeting their objectively assessed housing needs:

***"To boost significantly the supply of housing, local planning authorities should:***

- ***Use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area***
- ***Identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements..."***
- ***Identify a supply of specific, developable sites or broad locations for growth, for years 6-10, and where possible for years 11-15" (Paragraph 47)"***

2.1.2 The starting point of identifying objectively assessed housing needs is set out in paragraph 159 of the NPPF, which requires local planning authorities to prepare a Strategic Housing Market Assessment, working with neighbouring authorities where housing market areas cross administrative boundaries. It is clear from the Framework that the objective assessment of housing needs should take full account of up-to-date and relevant evidence about the economic and social characteristics and prospects of the area, with local planning authorities ensuring that their assessment of and strategies for housing and employment are integrated and take full account of relevant market and economic signals (paragraph 158).

2.1.3 Once a local authority has identified its objectively assessed needs for housing these needs should be met in full, unless any adverse impacts would significantly and demonstrably outweigh the benefits of doing so (paragraph 14). Local planning authorities should seek to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. Adverse impacts on any of these dimensions should be avoided. Where adverse impacts are unavoidable, mitigation or compensatory measures may be appropriate (paragraph 152).

2.1.4 As the Council will be aware the Government published its final suite of Planning Practice Guidance (PPG) on the 6<sup>th</sup> March 2014, clarifying how specific elements of the Framework should be

interpreted when preparing their Local Plans. The PPG on the Housing and Economic Development Needs in particular provides a clear indication of how the Government expects the Framework to be taken into account when Councils are identifying their objectively assessed housing needs. Key points from this document include:

- Household projections published by the Department for Communities and Local Government should provide the starting point estimate of overall housing need
- Plan makers should not apply constraints to the overall assessment of need, such as limitations imposed by the supply of land for new development, historic underperformance, infrastructure or environmental constraints.
- Household projection based estimates of housing need may need adjusting to reflect factors affecting local demography and household formation rates which are not captured by past trends, for example historic suppression by under supply and worsening affordability of housing. The assessment will need to reflect the consequences of past under delivery and the extent to which household formation rates have been constrained by supply.
- Plan makers need to consider increasing their housing numbers where the supply of working age population is less than projected job growth, to prevent unsustainable commuting patterns and reduced local business resilience.
- Housing needs indicated by household projections should be adjusted to reflect appropriate market signals, as well as other market indicators of the balance between the demand for and supply of dwellings.
- The more significant the affordability constraints (as reflected in rising prices and rents, and worsening affordability ratio) and the stronger other indicators of high demand (e.g. the differential between land prices), the larger the improvement in affordability needed, and the larger the additional supply response should be.
- The total affordable housing need should be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, given the probable percentage of affordable housing to be delivered by market housing led developments. An increase in the total housing figures included in the local plan should be considered where it could help to deliver the required number of affordable homes.

## 3 LEGAL COMPLIANCE

### 3.1 Duty to Cooperate

- 3.1.1 The Duty to Cooperate is a legal requirement established through Section 33(A) of the Planning and Compulsory Purchase Act 2004, as amended by Section 110 of the Localism Act. It requires local authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues throughout the process of Plan preparation. As demonstrated through the outcome of the 2012 Coventry Core Strategy Examination and the 2013 Mid Sussex Core Strategy Examination, if a Council fails to satisfactorily discharge its Duty to Cooperate, this cannot be rectified through modifications and an Inspector must recommend non-adoption of the Plan.
- 3.1.2 Whilst Gladman recognise that the Duty to Cooperate is a process of ongoing engagement and collaboration<sup>1</sup>, as set out in the PPG it is clear that it is intended to produce effective policies on cross-boundary strategic matters. In this regard, Reading Borough Council must be able to demonstrate that it has engaged and worked with neighbouring authorities, alongside any existing joint working arrangements, to satisfactorily address cross boundary strategic issues and the requirement to meet any unmet housing needs. This is not simply an issue of consultation but a question of effective cooperation on a range of inter-related planning issues, such as the need for effective infrastructure planning and for housing needs of Reading to be met in full in a manner that is consistent with achieving sustainable development. This is required in order to ensure a comprehensive approach to development and infrastructure provision is being taken across an urban area that crosses administrative boundaries, for example in order to ensure that development. Gladman are concerned that opportunities for sustainable growth in areas surrounding the whole of the urban area of Reading could be arbitrarily restricted if the current approach to the re-distribution of housing needs is taken forward. The approach to discharging the duty to cooperate should fully recognise those parts of South Oxfordshire District that functionally form part of the Western Berkshire Housing Market Area. This issue is discussed further under Policy H1 below.
- 3.1.3 The PPG reflects on the public bodies which are subject to the duty to cooperate. It contains a list of the prescribed bodies. The PPG then goes on to state that:

**“These bodies play a key role in delivering local aspirations, and cooperation between them and local planning authorities is vital to make Local Plans as effective as possible on strategic cross boundary matters.”**

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<sup>1</sup> PPG Reference ID. 9-011-2014036

- 3.1.4 The Council's proposed submission local plan and supporting evidence base does not demonstrate that the policy requirements for cooperation contained in paragraphs 178 to 181 of the Framework have been met.

## **3.2 Sustainability Appraisal**

- 3.2.1 In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in Local Plans must be subject to Sustainability Appraisal (SA). Incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, SA is a systematic process that should be undertaken at each stage of the Plan's preparation, assessing the effects of the Local Plan's proposals on sustainable development when judged against reasonable alternatives.
- 3.2.2 The Council should ensure that the results of the SA process clearly justify the policy choices made within the Local Plan. In meeting the development needs of the area in full, it should be clear from the results of the assessment why some policy options have been progressed and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the Local Plan's the methodological approach to scoring and associated decision making should be robust, justified and transparent. The sustainability merits of all of the reasonable alternatives should be fully explored and tested in the context of their ability to achieve a sustainable form of development that accord with national policy and fully support the economic, social and environmental objectives of the area.
- 3.2.3 Gladman would wish to highlight that sustainable development opportunities to support the delivery of its development needs in full must be thoroughly considered. In this regard, Gladman would highlight the need to assess a policy approach for the identification of development opportunities (and meeting any unmet development needs) on the urban edge of Reading within all boroughs that border its urban area, fully recognising those parts of South Oxfordshire District that functionally form part of the Western Berkshire Housing Market Area.

## 4 OBJECTIVELY ASSESSED HOUSING NEEDS

### 4.1 Background

4.1.1 The process of undertaking an OAN is clearly set out in the Framework principally in § 14, § 47, § 152 and § 159 and should be undertaken in a systematic and transparent way to ensure that the plan is based on a robust evidence base.

4.1.2 The starting point for this assessment requires local planning authorities to have a clear understanding of housing needs in their area. This involves the preparation of a Strategic Housing Market Assessment (SHMA) working with neighbouring authorities where housing market areas cross administrative areas as detailed in § 159 of the Framework. The Framework goes on to set out the factors that should be included in a SHMA including identifying

***“the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which:***

- ***Meets household and population projections taking account of migration and demographic change;***
- ***Addresses the need for all types of housing including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes); and***
- ***Caters for housing demand and the scale of housing supply necessary to meet this demand.”***

4.1.3 Key points that are worth noting from the above is that the objective assessment should identify the full need for housing **before** the Council consider undertaking any process of assessing the ability to deliver this figure. In addition, § 159 specifically relates to catering for both housing need and housing demand within the authority area. It is worth pointing out that any assessment of housing need and demand within a SHMA must also consider the following factors; falling household formation rates, net inward migration, the need to address the under provision of housing from the previous local plan period, the results of the Census 2011, housing vacancy rates including the need to factor in a housing vacancy rate for churn in the housing market, economic factors to ensure that the economic forecasts for an area are supported by sufficient housing to deliver economic growth, off-setting a falling working age population by providing enough housing to ensure retiring workers can be replaced by incoming residents, addressing affordability and delivering the full need for affordable housing in an area.

4.1.4 Of particular importance is the need to consider market signals. The consideration of market signals is one of the core planning principles considered in § 17 of the Framework, which states:

***'Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities.'***

- 4.1.5 Of critical importance is what the Framework goes on to say in §158 in the section discussing Plan Making. It states here:

***'Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals.'***

- 4.1.6 Market signals are therefore at the very core of what the Framework is trying to achieve in promoting sustainable development and boosting the supply of housing land.

- 4.1.7 The formal publication of the Planning Practice Guidance in March 2014 gives further explanation to what the Framework means with regard to market signals, and sets out, in a range of paragraphs, the way in which local planning authorities should go about factoring in relevant market signals in arriving at their OAN. §19 and §20 of the PPG gives guidance on what market signals should be taken into account and how plan makers should respond to these market signals. The below extracts identify some particularly pertinent points.

***'The housing need number suggested by household projections (the starting point) should be adjusted to reflect appropriate market signals, as well as other market indicators of the balance between the demand for and supply of dwellings. Prices of rents rising faster than the national/local average may well indicate particular market undersupply relative to demand.'***

- 4.1.8 The paragraph goes on to indicate that these factors would include, but should not be limited to, land prices, house prices, rents, affordability, rates of development and overcrowding. However, given what the Framework says at §17, quoted above, it seems clear that particular consideration should be given to affordability.

- 4.1.9 In order to consider how market signals should be taken forward §20 identifies some key concepts:

***'Appropriate comparisons of indicators should be made. This includes comparison with longer term trends (both in absolute levels and rates of change) in the: housing market area; similar demographic and economic areas; and nationally. A worsening trend in any of these indicators will require upward adjustment to planned housing numbers compared to ones based solely on household projections.'***

- 4.1.10 It is therefore clear that where market signals are apparent (in any of the indicators assessed) there is an absolute and clear direction that an upward adjustment to housing numbers is required. It is



also clear that both the absolute level of change and the rates of change are considerations, and that local planning authorities need to carefully benchmark themselves against other areas. This should not simply be a case of considering neighbouring authorities but should look at, as well as these, local authorities on a national basis, if the demographic and economic indicators are relevant. Gladman are firmly of the view that considering comparisons purely against neighbouring authorities is not sufficiently robust and does not address the underlying issues which both the Framework and PPG are trying to tackle with regard to housing.

4.1.11 What is of further importance when considering these issues is the period of time analysed when considering both relative and absolute change. It has become apparent, in our consideration of a number of plans that many local authorities choose to look at periods of time which are not fully representative of the depth of the housing crisis which we are currently within.

4.1.12 The problems are noted in *Fixing the Foundations: Creating a more prosperous nation* published by HM Treasury in July 2015. In paragraph 9.7 the report states:

***'There remains more to do. As the London School of Economics (LSE) Growth Commission found, 'under supply of housing, especially in high-growth areas of the country has pushed up house prices. The UK has been incapable of building enough homes to keep up with growing demand.'***

4.1.13 Gladman are therefore of the view that local planning authorities must take a long term view when considering affordability and consider the relative and absolute change over a long term 15-20 year period, which coincides with the normal time span of a Local Plan. Authorities should assess, as a constituent part of their OAN, how they can improve affordability over the life time of a plan to a point where affordability is more in line with average earnings and affordable mortgage lending rates. They should assess a level of housing over the 15-20 year plan period which would enable this step change and consider its deliverability in the plan. Only through planning for significant housing growth can local authorities realistically tackle market signals in the way advocated by the PPG and tackle the affordability and housing crisis.

4.1.14 The need to identify the full OAN before considering any issues with the ability of a Local Planning Authority to accommodate that level of development has been confirmed in the High Court. Most notably in *Solihull Metropolitan Borough Council v (1) Gallagher Homes Limited (2) Lioncourt Homes Limited* where it was considered that arriving at a housing requirement was a two stage process and that first the unconstrained OAN must be arrived at. In the judgement it was stated:

***"The NPPF indeed effected a radical change. It consisted in the two-step approach which paragraph 47 enjoined. The previous policy's methodology was essentially the striking of a balance. By contrast paragraph 47 required the OAN [objectively assessed need] to be made first, and to be given effect in the Local Plan save only to the extent that that would be inconsistent with other NPPF policies. [...] The two-***

***step approach is by no means barren or technical. It means that housing need is clearly and cleanly ascertained. And as the judge said at paragraph 94, “[h]ere, numbers matter; because the larger the need, the more pressure will or might be applied to [impinge] on other inconsistent policies”.***

4.1.15 Therefore, following the exercise to identify the full, OAN for housing in an area,

**“Local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. Significant adverse impacts on any of these dimensions should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where adverse impacts are unavoidable, measures to mitigate the impact should be considered. Where adequate mitigation measures are not possible, compensatory measures may be appropriate.” (NPPF §152)**

4.1.16 This statement clearly sets out that local planning authorities should seek to deliver the full OAN and that this should be tested through the evidence base. Only where the evidence shows that this is not achievable should they then test other options to see if any significant adverse impacts could be reduced or eliminated by pursuing these options. If this is not possible then they should test if the significant adverse impacts could be mitigated and where this is not possible, where compensatory measures may be appropriate.

4.1.17 The final stage of the process is outlined in §14 and involves a planning judgement as to whether, following all of the stages of the process outlined above,

**“Local Plans should meet OAN, with sufficient flexibility to adapt to rapid change, unless:**

- **any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this framework taken as a whole; or**
- **specific policies in this Framework indicate development should be restricted.”**

4.1.18 It is also worth noting that the final part of this sentence refers to footnote 9 of the Framework which sets out the types of policies that the Government consider to be restrictive. These include:

**“sites protected under the Birds and Habitat Directive (see paragraph 119) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, Heritage Coast**

**or within a National Park (or the Broads Authority); designated heritage assets; and locations at risk of flooding or coastal erosion”.**

- 4.1.19 Although this list is not exhaustive it is clear that local landscape designations, intrinsic value of the countryside, the character of areas, green gaps etc. are not specifically mentioned as constraints by the Framework.
- 4.1.20 The National Planning Practice Guidance (NPPG) contains guidance to support local authorities in objectively assessing and evidencing development needs for housing (both market and affordable) and economic development. This document supports and provides further guidance on the process of undertaking such assessments, in addition to what is set out in the Framework.

Berkshire (including South Bucks) Strategic Housing Market Assessment (February 2016)

- 4.1.21 The Local Plan relies on the OAN set out in the above document which indicates that OAN for Reading is 699 dwellings per annum over the period 203 to 2036. This is based on the 2012 Household Projections, which are then adjusted to take into account a number of matters.
- 4.1.22 In response to market signals, Gladman would raise concerns that the proposed uplift of 57 dwellings per annum is insufficient to address the affordability issues that exist in the area. ONS data confirms that the median quartile resident affordability ratio in Reading is 8.98 and the lower quartile ratio is 10.64. This is a worsening issue in the local context and the Local Plan must take this fully into account. This is an issue that has the potential to get worse over the plan period if housing supply in local markets within and around Reading are unnecessarily constrained, for example through arbitrary constraints being applied at the urban edge where administrative boundaries are tightly drawn.

## **5 POLICIES OF THE READING PRE-SUBMISSION LOCAL PLAN**

### **5.1 Policy H1: Provision of Housing**

- 5.1.1 It is noted that the Berkshire (with South Bucks) SHMA proposes an OAN of 2,855 dwellings per annum from 2013 to 2036 for the Western Berkshire HMA and OAN of 699 in Reading. It is essential that the objectively assessed housing needs of the Borough are met in full and that the Local Plan sets out how this will be achieved, having fully considered this through the plan preparation process and in discharging the duty to cooperate. Where there are issues of unmet need, the mechanism for securing the most appropriate and sustainable strategy for accommodating any such needs elsewhere in the HMA should be tested through plan making and the mechanism for enabling this clearly set out within policy wording. This will require positive engagement on this important cross boundary issue with all relevant neighbouring authorities within the functional housing market

- area through the duty to cooperate and this process should be supported by documentary evidence.
- 5.1.2 Gladman would expect the policy wording to provide certainty that the OAN will be met in full within the housing market area in the most sustainable manner (fully recognising that the HMA geography overlaps into South Oxfordshire District to the north of Reading) and a commitment given to on-going monitoring of the situation regarding unmet need to ensure that corrective action can be swiftly taken to resolve any issues with delivery that are observed during the plan period.
- 5.1.3 Gladman are also concerned that the Local Plan at Paragraph 1.2.2 is potentially misleading by inferring that the relationship between Reading and South Oxfordshire is different to that between Reading and West Berkshire or Wokingham. The Plan must take into consideration that there are opportunities for growth to the north of Reading and that this can be delivered in a sustainable manner that supports the needs of communities in this area and has the ability to respond to associated market demand. In doing so it will ensure that a sustainable solution is achieved that meets the needs of Reading immediately alongside where they arise.
- 5.1.4 Policy RL1 of the pre-submission Local Plan sets a network and hierarchy of centres within Reading within which Emmer Green is defined as a District Centre. It is also notable that the Local Plan highlights in its Strategy for Caversham and Emmer Green at Paragraph 8.2.2 that:
- “Caversham and Emmer Green have relatively little scope for additional development compared to some other areas of Reading, as virtually the whole area is covered by residential areas with some public open space. Much of lower Caversham is subject to flood risk constraints. There remains potential for infill development and development involving residential gardens, but this is not likely to be able to accommodate a significant proportion of Reading’s identified need.”*
- 5.1.5 This conclusion seemingly disregards development opportunities that exist beyond the administrative boundary of Reading which provide scope to deliver development in these areas to the north of the urban area.

## **5.2 Policy EN13: Major Landscape Features and AONB**

- 5.2.1 Any landscape policies should be consistent with the guidance set out in Section 11 of the Framework. In this regard, “Major Landscape Features” are not a designation that is defined within national planning policy. Any local landscape designations must be fully justified through the Council’s proportionate evidence base and associated policies drafted in a manner that ensures that balanced weight is applied to the hierarchy of designations as guided by the Framework.
- 5.2.2 Paragraph 113 of the Framework refers to the need for criteria based policies in relation to proposals affecting protected wildlife or geodiversity sites or landscape areas, and that that protection should be commensurate with their status and give appropriate weight to their importance and

contribution to wider networks. As currently drafted Gladman do not believe this landscape policy aligns with the provisions set out within the Framework.

5.2.3 Gladman wish to point out that impact on the landscape is one factor that should be considered by the decision maker when determining any planning proposal and ultimately it is a balance of the harm of development against the benefits. It is only where the harm significantly and demonstrably outweighs the benefits that planning permission should be refused.

5.2.4 Gladman also note that the policy confirms that none of Reading Borough lies within an area defined as AONB.

### **5.3 Policy H3: Affordable Housing and Policy H5: Standards for New Housing**

5.3.1 The Council's evidence base does not include a viability assessment that tests the implications of the proposed policies within the local plan in line with Paragraph 173 of the Framework. The absence of this works means that it is no possible for interested parties to assess the justification for the proposed policy requirements and make comments on whether policies such as H3: Affordable Housing or H5: Standards of New Housing are justified, effective or consistent with national policy.

## **6 HOUSING WHITE PAPER: FIXING OUR BROKEN HOUSING MARKET**

- 6.1.1 The Government published its Housing White Paper: Fixing Our Broken Housing Market on 7 February 2017. It provides a clear indication that the Government are in no doubt that the housing market in Britain is broken which, according to the Prime Minister, is one of the greatest barriers to progress in the country today.
- 6.1.2 Average house costs are almost eight times average earnings which is an all-time record and soaring prices and rising rents caused by a shortage of the right homes in the right places has slammed the door of the housing market in the face of a whole generation
- 6.1.3 The reason for this crisis is that the Country is simply not building enough homes and has not done so for far too long. The consensus is that we need from 225,000 to 275,000 or more homes per year to keep up with population growth and to start to tackle years of under-supply.
- 6.1.4 Everyone involved in politics and the housing industry therefore has a moral duty to tackle this issue head on. The White Paper states quite unequivocally that 'the housing shortage isn't a looming crisis, a distant threat that will become a problem if we fail to act. We are already living in it.'
- 6.1.5 Tackling the housing shortage is not easy. It will inevitably require some tough decisions. But the alternative, according to the White Paper, is a divided nation, with an unbridgeable and ever-widening gap between the property haves and have-nots.
- 6.1.6 The challenge of increasing supply cannot be met by government alone. It is vital to have local leadership and commitment from a wide range of stakeholders, including local authorities, private developers, housing associations, lenders and local communities.
- 6.1.7 The starting point is building more homes. This will slow the rise in housing costs so that more ordinary working families can afford to buy a home and it will also bring the cost of renting down. We need more land for homes where people want to live. All areas therefore need a plan to deal with the housing pressures they face.
- 6.1.8 Currently, over 40 per cent of local planning authorities do not have a plan that meets the projected growth in households in their area. All local authorities should therefore develop an up-to-date plan with their communities that meets their housing requirement based upon an honest assessment of the need for new homes.
- 6.1.9 Local planning authorities have a responsibility to do all that they can to meet their housing requirements, even though not every area may be able to do so in full. The identified housing requirement should be accommodated in the Local Plan, unless there are policies elsewhere in the National Planning Policy Framework that provide strong reasons for restricting development, or the adverse impacts of meeting this requirement would significantly and demonstrably outweigh the

- benefits. Where an authority has demonstrated that it is unable to meet all of its housing requirement, it must be able to work constructively with neighbouring authorities to ensure the remainder is met.
- 6.1.10 Plans should be reviewed regularly, and are likely to require updating in whole or in part at least every five years. An authority will also need to update their plan if their existing housing target can no longer be justified against their objectively assessed housing requirement.
- 6.1.11 Policies in Local Plans should also allow a good mix of sites to come forward for development, so that there is choice for consumers, places can grow in ways that are sustainable, and there are opportunities for a diverse construction sector including opportunities for SME housebuilders to deliver much needed housing.
- 6.1.12 In terms of rural areas, the Government expects local planning authorities to identify opportunities for villages to thrive, especially where this would support services and help meet the need to provide homes for local people who currently find it hard to live where they grew up. It is clear that improving the availability and affordability of homes in rural areas is vital for sustaining rural communities, alongside action to support jobs and services. There are opportunities to go further to support a good mix of sites and meet rural housing needs, especially where scope exists to expand settlements in a way which is sustainable and helps provide homes for local people. This is especially important in those rural areas where a high demand for homes makes the cost of housing a particular challenge for local people.
- 6.1.13 Finally, the Government have made it clear through the White Paper that local planning authorities are expected to have clear policies for addressing the housing requirements of groups with particular needs, such as older and disabled people.
- 6.1.14 The White Paper is the cornerstone of future Government policy on fixing the broken housing market. It provides the direction of travel the Government is intending to take and is a clear statement of intent that this Government is serious about the provision of the right number of houses in the right places. The Local Plan therefore needs to consider these policy intentions now in order to ensure that it fulfils the Government's agenda and provides the homes that its local communities need.
- 6.1.15 More recently, in October 2017, the Prime Minister reaffirmed the Government's commitment to addressing the broken housing market by bringing forward measures to boost home ownership and housing supply, stating:

*"I will dedicate my premiership to fixing this problem – to restoring hope. To renewing the British Dream for a new generation of people. And that means fixing our broken housing market."*

*"For 30 or 40 years we simply haven't built enough homes. As a result, prices have risen so much that the average home now costs almost 8 times average earnings. And that's been a disaster for young people in particular."*

6.1.16 Furthermore, in a message to housebuilders, the Prime Minister indicated that:

*"We, the government, will make sure the land is available. We'll make sure our young people have the skills you need. In return, you must do your duty to Britain and build the homes our country needs."*

6.1.17 The Autumn Budget 2017 brought further details of the Government's commitment to building a Britain that is 'fit for the future'. A prominent feature of this is tackling the housing crisis, with housebuilding featuring prominently amongst the Chancellor's announcements, indicating that:

*"The Government is determined to fix the broken housing market, and restore the dream of home ownership for a new generation."*

6.1.18 The affordability of housing for young people is a key challenge for the Government, and whilst it is recognised that there is no 'single magic bullet' to solve the housing crisis, the Government is actively seeking to tackle obstacles standing in the way of first-time buyers. The Government sees a 'big step up' in new house building as an important element in its strategy to address the acute affordability problem and has set a goal to build 300,000 homes a year by the mid-2020s.

6.1.19 The vital importance of housing to the economic success of our cities and regions is also highlighted in the Government's *"Industrial Strategy: building a Britain fit for the Future"*, November 2017. This includes reference to the introduction of planning reforms that will ensure more land is available for housing, and that better use is made of underused land in our cities and towns. It also sets out the challenge to raise housing supply to 300,000 per year before the end of the current Parliament. The Government wants to support places with ambitious and innovative plans to build additional homes where they are needed, and those which will support wider economic growth. Furthermore, the Government wants to support greater collaboration between councils, a more strategic approach to the planning of housing and infrastructure, more innovation and high quality design in new homes and the creation of the right conditions for new private investment.



## 7 SITE SUBMISSION

### 7.1 Context

7.1.1 Gladman wish to submit the following site for consideration through the plan-making process:

- Land off Peppard Road, Emmer Green

7.1.2 This site is located adjacent to the urban area of Reading but is located wholly within the administrative boundary of South Oxfordshire District. The site should be considered through the plan making process as a strategic growth location that relates to Reading. It therefore presents an opportunity to accommodate the unmet needs of Reading in a sustainable location alongside the administrative boundary of the Borough.

7.1.3 Whilst it is not the role of the Reading Local Plan to allocate land outside of its administrative boundary, it would be appropriate to consider this site as a strategic location for meeting unmet housing needs in the same manner as proposals for Grazeley within the Wokingham and West Berkshire administrative areas.

7.1.1 The site comprises 13.48 hectares adjacent to existing residential development at Emmer Green, Reading, in the Parish of Eye and Dunsden, in South Oxfordshire.

7.1.2 The site comprises three fields currently in agricultural use. It is well contained within the landscape and important trees and other landscape features would be retained. The local highway network has capacity to accommodate the additional traffic associated with the development of the site without adverse impact. There is an existing public right of way that crosses the southern part of the site linking Peppard Road with Kiln Road which will be retained and enhanced.

7.1.3 The site has a low ecological value and any loss of habitat would not be significant; mitigation and net biodiversity gains can be readily achieved. There are no designated heritage assets within or immediately adjacent to the site and its development would not adversely affect the setting of any listed building.

7.1.4 The site has the capacity to accommodate approximately 245 dwellings. In accordance with the National Planning Policy Framework, for a site to be considered deliverable, it must be available now, offer a suitable location for development now and there should be a realistic prospect that development would be delivered within five years. The site should also be viable. A Development Framework (CSA/3001/102 Rev H) is included at Appendix 1.

7.1.5 Emmer Green has a wide range of local services and facilities which are within easy walking and cycling distance of the site including; a primary school, secondary school, supermarket, newsagent, post office, pharmacy, playing fields and allotments. Indeed, Policy RC1 of the Pre-Submission Local Plan highlights Emmer Green as a District Centre within the local network and hierarchy of centres.

Furthermore, the Plan introduces a strategy for the areas of Caversham and Emmer Green which includes key transport measures that include the introduction of park and ride facilities. However, the Plan highlights that there is relatively little scope for growth in these areas, which disregards the clear development opportunities that do exist adjacent to these important and sustainable locations to the north of the urban area. These areas provide a sustainable opportunity for development to meet the needs of Reading in a location adjacent to where this need arises.

- 7.1.6 Emmer Green has excellent bus services to Reading town centre, Caversham and Sonning Common which pass the site. Local services are available in Caversham and Sonning Common. The bus journey from the site to central Reading (including the railway station) has a journey time of approximately 15 minutes
- 7.1.7 Reading is a major service centre with significant employment opportunities and is a key hub for the Thames Valley Region. Reading Railway Station provides very frequent services to London Padding and Waterloo stations throughout the day to further widen employment opportunities.
- 7.1.8 Gladman is fully committed to bringing forward this site for development at the earliest opportunity and its application for up to 245 dwellings was validated by South Oxfordshire District Council in November 2016 (application ref: P16/S3630/O). However, the application was refused at Planning Committee in September 2017, despite receiving a recommendation for approval by the Case Officer. Gladman submitted an appeal against the refusal of planning permission and the application is to be heard by way of Public Inquiry between the dates of 1<sup>st</sup>-4<sup>th</sup> May 2018.
- 7.1.9 Gladman is committed to bringing forward the site for development at the earliest opportunity. The site is eminently capable of being fully developed in the early years of the Local Plan.

## **8 CONCLUSIONS**

- 8.1.1 Gladman welcome the opportunity to make comments at this stage of the plan preparation process. We trust that these representations will prove constructive in assisting the Council in further developing its Local Plan.
- 8.1.2 Gladman has raised a number of issues of soundness that should be addressed by the Council prior to the submission of the Local Plan to the Secretary of State for Examination. In particular, it is important that interested parties are provided an opportunity to comment on the evidence base that has been prepared to support the drafting of the policies contained within the local plan. The Council should therefore carefully consider whether it would be prudent to publish a Viability Study for consultation prior to the Submission of the Local Plan.
- 8.1.3 Please feel free to make contact should the Council have any queries or require further details in relation to the site submission that we have proposed through these representations. We look forward to being provided the opportunity to further explain our concerns with the Local Plan at the Examination in due course.

# **Appendix 1**

## **Development Framework Plan**

### **Land off Peppard Road, Emmer Green**



Based upon the Ordnance Survey map with the permission of the Controller of Her Majesty's Stationary Officer. Crown Copyright reserved.

Licence Number AR 100031731



- Site boundary: 13.48ha
- Potential residential land: 8.23ha  
Approx. 245 dwellings at average density of 30dph
- Lower density housing areas
- Higher density housing areas
- Proposed vehicular access points
- Potential spine road through development
- Potential secondary streets/private drives
- Existing public footpath
- Existing bridleway
- Local cycle route (Sustrans)
- Existing bus routes and bus stops
- Potential recreational routes
- Road crossing points designed for pedestrian priority
- ✱ Potential play facilities for children and young people
- ↔ Existing pedestrian linkages
- ↔ Potential pedestrian linkages
- Existing vegetation
- Potential formal and informal recreation areas and small amenity spaces (to include new landscaping and tree planting)
- Proposed structural vegetation
- Tree Preservation Orders
- New sustainable drainage features
- Clayfield Copse Local Nature Reserve
- Potential location for pump station

H	22.03.17	SeM	Minor amendments
G	21.03.17	SeM	Minor amendments
F	26.10.16	SG	Minor red line amendments
E	03.10.16	AgB	Minor amendments
D	05.09.16	SE	Access amended
C	10.08.16	CM	Layout amended
B	01.08.16	SeM	Text amendment

Rev	Date	By	Description
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**CSA**  
environmental

Dixies Barns, High Street,  
Ashwell, Hertfordshire SG7 5NT

☎ 01462 743647  
✉ ashwell@csaenvironmental.co.uk  
🌐 csaenvironmental.co.uk

Project	Emmer Green, Reading		
Title	Development Framework Plan		
Client	Gladman Developments Ltd		
Scale	1:2500 @ A2	Drawn	AS
Date	July 2016	Checked	RR
Drawing No.	CSA/3001/102	Rev	H



GRASHOFF, ANDREA

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**From:** Andrea  
**Sent:** 26 January 2018 11:31  
**To:** Planning Policy  
**Subject:** PRE SUBMISSION DRAFT READING BOROUGH LOCAL PLAN November 2017

**This is an EXTERNAL EMAIL. STOP. THINK before you CLICK links or OPEN attachments.**

Mrs Andrea Grashoff

**PART B**

B1 This representation relates to the PRE-SUBMISSION DRAFT READING BOROUGH LOCAL PLAN November 2017

B2 Do I think that the local Plan:

Is legally compliant? No

Is sound? No

Fulfils the duty to co-operate No

B4.

**Comments on Reading Borough Council (RBC)**

**PRE-SUBMISSION DRAFT READING BOROUGH LOCAL PLAN November 2017**

I strongly object to the inclusion of the area designated as 8 CA1b “Part of Reading Golf Course, Kidmore End Road” in the Draft Local Plan (DLP) and request its removal.

Its inclusion is counter to two of the main expectations of the DLP:

“Open Spaces - key open spaces remain subject to strong policy protection, including a new designation for Local Green Space”

“Heritage - substantially expanded heritage policies outlining a positive strategy for conservation and enhancement of Reading’s heritage.”

The whole of Reading Golf Course (RGC) is a natural open Green space supporting the environment and an extensive array of wildlife, fauna and flora. It has been this way for the last 108 years it should remain this way into the future. The area is an important green space, home to many and diverse floral and fauna. Protected wildflowers thrive in parts and there are many and various tree species many of which are subject to Tree Preservation Orders. A multiplicity of fauna use RGC as a home and foraging area and any development would have a highly detrimental impact on this established balanced natural environment. Loss of green space and loss of recreation and amenity value of the current use would be highly detrimental. Removing part of this would be counter to RBC policy. The green space in question forms a natural conduit to the neighbouring ancient woodlands and areas of Outstanding Natural Beauty in the Chilterns in South Oxfordshire.

Any residential development on 8 CA1b would not only have all the above negative effects but also cause further damage and harm. For example, increased traffic flow in the area would be highly negative given the current high density of housing, relatively narrow roads, already excessive on-road parking with resulting exacerbated local traffic congestion. Further, the flow of traffic across the Thames would substantially increase causing congestion in Caversham and the town centre. The promise of a third bridge in the document is clearly undeliverable. This has been an 'agenda item' for the last 30 years and still undelivered. The provision of this important transport link is not even mentioned on the DLP "Major Transport Projects". The body of the document recognises that the delivery of the third bridge is outside the remit of RBC and dependant on the opinion, priorities and decisions made by surrounding local councils.

The services and infrastructure for the houses in Emmer Green was designed to meet the needs of the original housing development in the 1930s to 1950s. Adding more houses to the infrastructure would place an unbearable further stress on the infrastructure. Limited development in the local area has already stressed the infrastructure such that healthcare and schooling cannot properly be provided to the community locally. Local Doctors Surgeries are oversubscribed, local schools cannot even accommodate children who live within their catchment.

Please remove the area designated as 8 CA1b "Part of Reading Golf Course, Kidmore End Road" in the Draft Local Plan (DLP)

B5. If you are seeking a modification to the plan, do you wish to appear in person at the public examination?  
**No**

B7. Do you wish to be kept informed of planning policy matters

Please keep me informed of the progress of this Local Plan: **Yes**

Please keep me informed of all planning policy matters **Yes**

Yours sincerely

Andrea Grashoff

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GRASHOFF, GREGORY

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**From:** Greg Grashoff  
**Sent:** 26 January 2018 11:02  
**To:** Planning Policy  
**Subject:** Four (4) Separate submissions relating to the PRE-SUBMISSION DRAFT READING BOROUGH LOCAL PLAN November 2017

**This is an EXTERNAL EMAIL. STOP. THINK before you CLICK links or OPEN attachments.**

**Please find four (4) separate submissions in relation to the PRE-SUBMISSION DRAFT READING BOROUGH LOCAL PLAN November 2017.** I have organised these into the format required but I am unable to submit on the form as this will not download to my computer.

Thank you  
]  
G J Grashoff

**THIS IS SUBMISSION GRAS001**

**PART A**

Mr Gregory Grashoff

**PART B**

B1 This representation relates to The Local Plan and documents ‘Statement of Consultation on the Draft Local Plan November 2017’ and PRE-SUBMISSION DRAFT READING BOROUGH LOCAL PLAN November 2017

B2 Do I think that the local Plan:

Is legally compliant? No

Is sound? No

Fulfils the duty to co-operate No

B3

The document is not legally compliant as comments submitted by individuals and organisations and included in the ‘Statement of Consultation on the Draft Local Plan November 2017’ have been summarised and key elements of the comments have been excluded. This does not represent full and appropriate disclosure and hides potentially important information from all interested parties.

The document is not sound as comments submitted by individuals and organisations and included in the ‘Statement of Consultation on the Draft Local Plan November 2017’ have been summarised and key elements of the comments have been excluded. This does not represent full and appropriate disclosure and hides potentially important information from all interested parties.

The document does not comply with the duty to co-operate as there is no rigorous analysis of the the interaction with all the relevant bodies that should be consulted and involved in the development of the Draft Local Plan before the its’ publication.

B4.

The PRE-SUBMISSION DRAFT READING BOROUGH LOCAL PLAN November 2017 should be withdrawn and the ‘Statement of Consultation on the Draft Local Plan November 2017’ should be thoroughly reviewed and revised to provide an accurate and complete version of all the comments made by individuals and organisations. To provide clarity and transparency, any comments that were omitted in the ‘Statement of Consultation on the Draft Local Plan November 2017’ should be highlighted so that the content can be properly reviewed by all interested parties.

B5. If you are seeking a modification to the plan, do you wish to appear in person at the public examination?

**Yes**

B6. If you wish to appear in person, please briefly outline why you consider this necessary?

**To fully represent all the points that need to be made to the examiner**

B7. Do you wish to be kept informed of planning policy matters

Please keep me informed of the progress of this Local Plan: **Yes**

Please keep me informed of all planning policy matters **Yes**

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-----  
**THIS IS SUBMISSION GRAS002**

**PART A**

Mr Gregory Grashoff

**PART B**

B1 This representation relates to the PRE-SUBMISSION DRAFT READING BOROUGH LOCAL PLAN November 2017, Section 8. CAVERSHAM AND EMMER GREEN and CA1b of the Local Plan and the document ‘Statement of Consultation on the Draft Local Plan November 2017’

B2 Do I think that the local Plan:

Is legally compliant? No - see Submission GRAS001 and

Is sound? No - see Submission GRAS001 and

Fulfils the duty to co-operate No - see Submission GRAS001 and

B3 the comments made by the Reading Borough Council Officer in the ‘Statement of Consultation on the Draft Local Plan November 2017’ in response to the submissions are inadequate, often non-specific, often out-of-date and clearly not well constructed.

For example:

“ECOLOGICAL: The part of the Golf Course identified is not a designated Wildlife Heritage Site/Local Wildlife Site. Previous ecology advice has not identified any particular significance.”

The second sentence clearly indicates that this statement is out-of-date and not current.

B4 Withdraw the PRE-SUBMISSION DRAFT READING BOROUGH LOCAL PLAN November 2017. The ‘Statement of Consultation on the Draft Local Plan November 2017’ should be thoroughly reviewed and revised. The Responses made by the Reading Borough Council Officer to the comments made by individuals and organisations should be reviewed and revised so that they are all current, relevant and devoid of any bias.

B5. If you are seeking a modification to the plan, do you wish to appear in person at the public examination?

**Yes**

B6. If you wish to appear in person, please briefly outline why you consider this necessary?

**To fully represent all the points that need to be made to the examiner**

B7. Do you wish to be kept informed of planning policy matters

Please keep me informed of the progress of this Local Plan: **Yes**

Please keep me informed of all planning policy matters **Yes**

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**THIS IS SUBMISSION GRAS003**

**PART A**

Mr Gregory Grashoff

**PART B**

B1 This representation relates to Section 8 .CAVERSHAM AND EMMER GREEN and CA1b of the Local Plan and the document ‘Statement of Consultation on the Draft Local Plan November 2017’

B2 Do I think that the local Plan:

Is legally compliant? No - see Submission GRAS001 and

Is sound? No - see Submission GRAS001 and

The inclusion of CA1b is totally inappropriate. The document reads like Reading Borough Council encourage the building of houses on land that is private and has been used as green space and leisure facilities for more than a century, without any submission for planning. It appears that RBC are proposing a plan to utilise this space without any positive intent from the land owners to pursue a development. Furthermore the plan proposed requires action by third parties (SODC) to be undertaken to allow any sensible progress.

Fulfils the duty to co-operate No - see Submission GRAS001 and

the documentation makes no reference to any attempt to co-operate with RGC to establish the opinions of the land owners. Nor is there any references to co-operation with SODC about the potential acquisition of land which would require their planning approval either for a change of use or for new buildings.

B4.

The Section 8 CA1b should be removed from the PRE-SUBMISSION DRAFT READING BOROUGH LOCAL PLAN November 2017 document as a credible and suitably compliant option for development.

B5. If you are seeking a modification to the plan, do you wish to appear in person at the public examination?

**Yes**

B6. If you wish to appear in person, please briefly outline why you consider this necessary?

**To fully represent all the points that need to be made to the examiner**

B7. Do you wish to be kept informed of planning policy matters

Please keep me informed of the progress of this Local Plan: **Yes**

Please keep me informed of all planning policy matters **Yes**

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**THIS IS SUBMISSION GRAS004**

**PART A**

Mr Gregory Grashoff

## PART B

B1 This representation relates to PRE-SUBMISSION DRAFT READING BOROUGH LOCAL PLAN November 2017, Section 8 .CAVERSHAM AND EMMER GREEN and CA1b of the Local Plan.

B2 Do I think that the local Plan:

Is legally compliant? No - see Submission GRAS001 and

Is sound? No - see Submission GRAS001 and

Using extracts from the PRE-SUBMISSION DRAFT READING BOROUGH LOCAL PLAN November 2017 shown below in blue:

### 8.1.2

Emmer Green was a smaller settlement in a location at the edge of the Chiltern Hills, featuring a number of chalk mines, before becoming subsumed within the wider urban area.

### 8.1.3

Unlike other suburban parts of Reading, the urban area does not extend beyond the Borough boundaries into South Oxfordshire district, and these areas directly abut the Oxfordshire countryside. For most of its length, the northern part of the Reading Borough boundary follows the exact urban edge. To the west of Caversham, the Chilterns Area of Outstanding Natural Beauty adjoins the Borough boundary.

### 8.1.6

However, the ground quickly rises to the north and northwest, as the remainder of the area undulates as it meets the fringes of the Chiltern hills. The 'dry valleys' typically found in the Chilterns also extend into Caversham, and there are a number of wooded and undeveloped areas that help to link the area into the wider Chilterns landscape beyond.

The area designated in PRE-SUBMISSION DRAFT READING BOROUGH LOCAL PLAN November 2017, as CA1b has been established green space and leisure area for more than a century. The inclusion of this space in the Local Plan contravenes the clearly stated Strategy for Caversham and Emmer Green (Section 8.2) and key principles for the area in the following ways:

#### 8.2.1 The following represent some key principles for the area:

a. There will be enhanced pedestrian links between central Caversham and Reading town centre; **This statement should be removed**

There is no demand for such enhanced pedestrian links, RBC have no data to support this 'key principle'

There is no suggestion of a key principle to improve traffic flow and reduce congestion for individuals car owners and seeking access to and from Caversham and Emmer Green which would be supported by residents. A clear lack of poor consultation and RBC operating their own agenda.

b. New development will provide or contribute to infrastructure to adequately support the development; **This statement should be removed**

Based on previous performance, this statement is hard to believe. Similar statements have been made for previous developments and in the end, not followed through. (eg Bugs Bottom development)

d. The Council will continue to work with its neighbouring authorities towards provision of a crossing of the Thames east of Reading **This statement should be removed**

This is an idle and insincere statement which has no justification and cannot be believed based on all previous actions of RBC over the last 30 years in attempting to establish a third river crossing.

e. Areas of landscape and heritage importance will be preserved, including the edge of the Chilterns Area of Outstanding Natural Beauty;

The inclusion of CA1b is directly opposed to this "key principle. It removes important green space and leisure facilities. It removes an important part of the green corridor from the heart of Emmer Green into the Oxfordshire countryside where there are numerous wooded and undeveloped areas that link the area into the Chilterns landscape and Area of Outstanding Natural Beauty. The area of RGC in South Oxfordshire is designated "Ancient Woodland, BAP priority habitat, local wildlife site, protected species buffer zone" (SODC SHELAA number 71)

SODC exclude the total area of RGC that falls in their jurisdiction from any development and designate it as "undeveloped Golf Course" until 2036.

EN7(iii): New policy with inclusion of Local Green Space designation

This option would introduce Local Green Space designation according to the guidelines outlined the NPPF. This would bring more significant positive effects in terms of recreation, leisure and culture (17) by providing an additional level of protection to sites most deserving. Effects to the natural environment (7), landscape character (9) and community cohesion (12) would also be more pronounced than in option (ii). A tendency towards negative effects would occur with regard to adaptation to climate change (2), undeveloped land (4), health (11) and sustainable transport (14). Effects on housing (13) are unclear.

Conclusion

Option (iii) is the preferred option because it brings particularly positive effects.

Fulfills the duty to co-operate

No - see Submission GRAS001

B4.

The Strategy for Caversham and Emmer Green should be revised as indicated above and **Section 8 CA1b should be removed** from the PRE-SUBMISSION DRAFT READING BOROUGH LOCAL PLAN November 2017 document as a credible and suitably compliant option for development.

Policy EN7 should be applied and the whole of Reading Golf Club land designated as an important Local Green Space in perpetuity.

RBC policy on this natural green space should align with SODC policy to harmonise and consolidate the treatment and protection of the environment, wildlife and fauna.

B5. If you are seeking a modification to the plan, do you wish to appear in person at the public examination?

**Yes**

B6. If you wish to appear in person, please briefly outline why you consider this necessary?

**To fully represent all the points that need to be made to the examiner**

B7. Do you wish to be kept informed of planning policy matters

Please keep me informed of the progress of this Local Plan:

**Yes**

Please keep me informed of all planning policy matters

**Yes**

**Yours Sincerely**

**G J Grashoff**

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GREATER LONDON AUTHORITY

---

**From:** Jorn Peters <Jorn.Peters@london.gov.uk>  
**Sent:** 02 February 2018 16:09  
**To:** Roughan, Kiaran; Worringham, Mark; Planning Policy  
**Cc:** Darren Richards; Carr Richard (RichardCarr@tfl.gov.uk)  
**Subject:** Reading Borough Local Plan - chance to comment on Pre-Submission Draft Local Plan  
**Attachments:** Reading LP - GLA response June 2017.pdf

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Dear Kiaran,

We have no records of having been directly consulted on your Pre-Submission Draft Local Plan, but we were informed about it by Transport for London and are taking the opportunity to supplement the comments we made in our letter of 14 June 2017, which I attach again.

We welcome the slight increase in your housing supply figure and the Memorandum of Understanding with the West Berkshire local authorities about Reading's unmet housing need.

Please note that London's housing need is based on our 2016-based projections, which are available on the London Datastore: <https://data.london.gov.uk/dataset/2016-based-projections-national-outputs>. These projections include consistent outputs for all local authorities in England and form the basis for housing need in the draft London Plan, which we are consulting on until 2 March 2018.

Please also note that Reading is part of the following two joint Strategic Infrastructure Priorities set out in the Wider South East section of the new draft London Plan (see Policy SD3 and Figure 2.15).

- North Down Rail Link (Gatwick - Reading)
- Great Western Mainline (London - Reading / Western Rail Access to Heathrow)

If you would like to discuss the matters raised above further and/or arrange a meeting, please get in touch.

Kind regards  
Jorn

**Jörn Peters MRTPI**

Senior Strategic Planner - Development, Enterprise & Environment [GREATERLONDONAUTHORITY](http://GREATERLONDONAUTHORITY)  
City Hall, The Queens Walk, London SE1 2AA T: +44 (0)20 7983 4432 E: [jorn.peters@london.gov.uk](mailto:jorn.peters@london.gov.uk)

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**From:** Planning Policy [<mailto:planningpolicy@reading.gov.uk>]  
**Sent:** 30 November 2017 11:20  
**Subject:** Reading Borough Local Plan – chance to comment on Pre-Submission Draft Local Plan

**Reading Borough Local Plan – chance to comment on Pre-Submission Draft Local Plan**

Reading Borough Council is now consulting on the Pre-Submission Draft Local Plan until 26<sup>th</sup> January 2018.

We are in the process of producing a new Local Plan to replace existing development plan documents, and to plan for development in Reading up to 2036. Once adopted, the Local Plan will be the main document that informs how



planning applications are determined and covers a wide variety of strategic matters, policies and specific sites for development.

We are seeking comments over the next eight weeks during a period of public consultation. The full Pre-Submission Draft Local Plan is on the Council's website at: <http://www.reading.gov.uk/newlocalplan> and copies can also be viewed at the Civic Offices, Bridge Street, Reading, RG1 2LU (between 9 am and 5 pm on weekdays) and in all Council libraries (during normal opening hours). Supporting documents, such as a Pre-Submission Draft Proposals Map, Sustainability Appraisal and Infrastructure Delivery Plan are also available on the Council's website and are available for your comments. Guidance on how to make representations, which includes a representations form which can be used if you wish, is attached.

We welcome any comments that you have. Please provide written responses to the consultation by 5 p.m. on Friday 26<sup>th</sup> January 2018. Responses should be sent to: [planningpolicy@reading.gov.uk](mailto:planningpolicy@reading.gov.uk) or Planning Policy Team, Reading Borough Council, Civic Offices, Bridge Street, RG1 2LU.

You may also wish to attend one of our drop-in events to talk about the Local Plan to a planning officer in more detail. There is no need to let us know if you wish to attend beforehand. These will be held at the Civic Offices, Bridge Street, RG1 2LU in main reception on Wednesday 6<sup>th</sup> December from 1:00 to 6:00 p.m. and Tuesday 12<sup>th</sup> December from 2:00 to 7:00 p.m.

We intend to submit the plan to the Secretary of State in February or March 2018, taking your responses to this consultation into account. A public examination will take place thereafter with adoption expected in late 2018 or early 2019.

If you would like to be removed from our consultation lists, please let us know. We look forward to receiving your comments.

Regards,

Planning Policy Team  
Planning Section | Directorate of Environment and Neighbourhood Services

Reading Borough Council  
Civic Offices  
Bridge Street  
Reading  
RG1 2LU

0118 937 3337

Email: [planningpolicy@reading.gov.uk](mailto:planningpolicy@reading.gov.uk)

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**GREATER LONDON AUTHORITY**  
Development, Enterprise and Environment

**Kiaran Roughan**  
Planning Manager

Reading Borough Council  
Civic Offices  
Bridge Street  
Reading  
RG1 2LU

Date: 14 June 2017  
Our ref: LP/JP24

Dear Kiaran,

**Draft Reading Borough Local Plan**

Thank you for consulting us on your draft Local Plan.

The Borough sits within the 'Western Wedge' Coordination Corridor extending from west London into the Thames Valley. Policy 2.3 of the London Plan sets out how these corridors can support strategic co-ordination of planning and investment. In the context of Reading's role as a significant economic and business centre, it may be useful to explore relevant economic linkages with London. Given Reading's good access to the transport network, we support the draft Plan's level of ambition in terms of employment including industry/warehousing/freight/logistics. We would welcome a conversation with the Council on collaboration opportunities regarding related wider land use requirements, where mutual benefits can be achieved.

The approach to housing need set out in the Berkshire Strategic Housing Market Assessment (SHMA) is welcomed, in particular the use of a 10-year historic migration trend and the consideration of an adjustment to reflect pre-recession migration patterns to and from London. The Council should note that our latest population and household projections will be published in w/c 10 July 2017. These projections will form the basis of the next London Plan and will include consistent outputs for all local authorities in England.

The draft Plan states that the Council cannot accommodate identified need for 943 dwellings within its boundaries over the Plan period. We support the joint West of Berkshire Planning Framework and in particular its strategic perspective on longer term growth opportunities within the area and agree this should be developed as an avenue to address the shortfall identified in the draft Plan.

From a transport perspective, we refer to the capacity improvements and related opportunities arising from the Great Western Mainline, Western Access to Heathrow, and Crossrail set out in our response to your Issues and Option draft. We welcome the reference to the Crossrail Safeguarding Direction in 4.5.10. It will be important to liaise closely with Transport for London on taking proposals for individual sites forward. For further details, please see TfL's response included as Annex 1.

If you would like to discuss the matters raised above further and/or arrange a meeting, please contact Jorn Peters ([Jorn.peters@london.gov.uk](mailto:Jorn.peters@london.gov.uk)).

Yours sincerely

**Julietta McLoughlin**

Assistant Director - Planning

cc: National Planning Casework Unit, DCLG  
Lucinda Turner, TfL

## **Annex 1**

### **Detailed comments from Transport for London**

Crossrail services (but not Crossrail Ltd or the Crossrail project/scheme) are now referred to as the Elizabeth Line and this wording should be reflected in the Local Plan e.g. in 1.26, 3.2.2, 4.5.10, 5.4.2. The Elizabeth Line could also be added to the glossary.

TfL welcomes the reference to the Crossrail Safeguarding Direction in 4.5.10. It has not been possible to verify the accuracy of the safeguarding limits shown on the proposals map but the intention to consult Crossrail Ltd is welcomed. From 2019 when Elizabeth Line services are fully operational, consultation regarding any development proposals within the safeguarded area or any other applications likely to affect the operation of Elizabeth Line services should be sent to TfL Planning. Crossrail Ltd only exists to deliver the project and Elizabeth Line operations and any remaining assets that are not transferred to other authorities will be the responsibility of TfL.

## GREYFRIARS CHURCH

26<sup>th</sup> January 2018

Planning Policy,  
Reading Borough Council,  
Civic Offices,  
Bridge Street,  
Reading,  
RG1 2LU

By email: [planningpolicy@reading.gov.uk](mailto:planningpolicy@reading.gov.uk)

Dear Sir / Madam

**Reading Borough Council Pre-Submission Draft Local Plan November 2017  
Representations on Behalf of Greyfriars Church**

Greyfriars Church thank the Planning Authority for the opportunity to comment on the Pre-Submission Reading Local Plan. This letter and enclosure set out their comments on the draft Plan.

I trust that the above and enclosed are of assistance. Should you require any further information please do not hesitate to contact Bluestone Planning.

Yours faithfully

  
Jeremy Flawn  
Partner – Bluestone Planning

Encs.

Cc. Julian Rowlandson - Greyfriars Church

Please return by Friday 26<sup>th</sup> January 2018 to: Planning Policy, Civic Offices,  
 Bridge Street, Reading, RG1 2LU or email [planningpolicy@reading.gov.uk](mailto:planningpolicy@reading.gov.uk)

**PART A - YOUR DETAILS**

	<b>Personal Details</b>	<b>Agent's Details</b> <i>(if applicable)</i>
<b>Title</b>		MR
<b>First Name</b>		JEREMY
<b>Last Name</b>		FLAWN
<b>Job Title</b> <i>(if applicable)</i>		PARTNER
<b>Organisation</b> <i>(if applicable)</i>	GREYFRIARS CHURCH	BLUESTONE PLANNING
<b>Address 1</b>	C/O AGENT	SUITE 5 ENTERPRISE CENTRE
<b>Address 2</b>		BDG 41/42 SHRIVENHAM 100 BUSINESS PARK
<b>Address 3</b>		MAJORS ROAD
<b>Town</b>		WATCHFIELD
<b>Post Code</b>		SN6 8TZ
<b>Telephone</b>		07725 601457
<b>E-mail</b>		<a href="mailto:jeremy@bluestoneplanning.co.uk">jeremy@bluestoneplanning.co.uk</a>

**PART B - YOUR REPRESENTATION** (please use a separate form for each representation)

**B1. To which part of the Local Plan does this representation relate?**

POLICY CR11 AND PROPOSALS MAP (J)

**B2. Do you consider that the Local Plan:** (please tick as appropriate)

Is legally compliant?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Is sound?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
Fulfils the duty to co-operate?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

**B3. Please provide details of why you think the Local Plan, or part of the plan, is or is not legally compliant, sound and/or complies with the duty to co-operate.**

POLICY CR11 IS TO BE SUPPORTED AS A POSITIVE TOOL TO SECURE IMPROVEMENTS TO SPECIFIC AREAS WITHIN THE TOWN CENTRE.

GREYFRIARS CHURCH IS A PARTICULARLY IMPORTANT HISTORIC LANDMARK IN A PART OF THE TOWN CENTRE THAT IS CHARACTERISED BY ITS MODERN, BUSTLING ATMOSPHERE AT THE WESTERN END OF ONE OF THE TOWN'S MAIN RETAIL AREAS. IT PROVIDES A PHYSICAL AND VISUAL 'END' TO FRIAR STREET BEFORE THE A329 JUNCTION ABRUPTLY APPEARS AHEAD.

HOWEVER, DESPITE THE HISTORICAL AND CULTURAL SIGNIFICANCE OF THE CHURCH, THE LAND IMMEDIATELY SURROUNDING THE CHURCH DOES NOT CONTRIBUTE TO THAT SIGNIFICANCE, PARTLY DUE TO THE AGE AND STATE OF REPAIR OF THE BUILDINGS AND PARKING AREA WITHIN THE CHURCH'S CURTILAGE, BUT ALSO BECAUSE OF THE POOR QUALITY PUBLIC REALM TO THE WEST OF THE CHURCH PARKING AREA.

POLICY CR11 PROVIDES AN EXCELLENT OPPORTUNITY TO DESIGNATE THE CHURCH AND THE LAND AROUND IT (INCLUDING THE PUBLIC REALM LAND BETWEEN THE A329 AND THE CHURCH) AS AN AREA FOR MODERNISATION AND PUBLIC REALM ENHANCEMENTS.

HOWEVER AS DRAFTED, POLICY CR11 IS CONSIDERED TO BE UNSOUND IN THAT IT FAILS TO PROVIDE THE OPPORTUNITY TO IMPROVE THE SITE INCLUDING AND ADJACENT TO GREYFRIARS CHURCH, AND IT IS THEREFORE NOT ONLY NOT POSITIVELY PREPARED, BUT IT IS NOT THE MOST APPROPRIATE STRATEGY AND IS THEREFORE NOT JUSTIFIED EITHER.

*Please continue on another sheet if necessary*



**B4. Please set out the modifications that you think would make the Local Plan, or part of the plan, legally compliant and/or sound. Please provide specific wording where possible.**

1. AMEND POLICY CR11 BY INSERTING A FINAL PARAGRAPH (CR11j) TO READ AS FOLLOWS:

*“CR11J, GREYFRIARS CHURCH AND ENVIRONS:  
THIS AREA OF THE TOWN CENTRE PRESENTS AN OPPORTUNITY TO DELIVER PUBLIC REALM IMPROVEMENTS AS WELL AS THE REDEVELOPMENT OF THE GREYFRIARS CHURCH PRECINCT WHICH CONTAINS SEVERAL STRUCTURES THAT DO NOT CONTRIBUTE TO THE SIGNIFICANCE OF THIS HIGHLY VALUED GRADE I LISTED CHURCH (INCLUDING THE CHURCH CENTRE, PORTACABIN STRUCTURES AND 1970s WEST END EXTENSION). DEVELOPMENT PROPOSALS SHOULD HAVE REGARD TO THE DESIRABILITY OF SUSTAINING AND ENHANCING THE SIGNIFICANCE OF THE CHURCH AS WELL AS THE WIDER SOCIAL, CULTURAL, ECONOMIC AND ENVIRONMENTAL BENEFITS THAT CONSERVATION OF THIS HISTORIC PART OF READING CAN BRING.”*

2. ALTER THE PROPOSALS MAP (INSET MAP J) TO DEPICT THE BOUNDARY OF THIS ADDITIONAL AREA.

*Please continue on another sheet if necessary*

**B5. If you are seeking a modification to the plan, do you wish to appear in person at the public examination?**

Yes  No

**B6. If you wish to appear in person, please briefly outline why you consider this necessary.**

N/A

**B7. Do you wish to be kept informed of planning policy matters?**  
(please tick as appropriate)

Please keep me informed of the progress of this Local Plan:

Please keep me informed of all planning policy matters:

**PART B - YOUR REPRESENTATION** (please use a separate form for each representation)

**B1. To which part of the Local Plan does this representation relate?**

POLICY CR9

**B2. Do you consider that the Local Plan:** (please tick as appropriate)

Is legally compliant?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Is sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Fulfils the duty to co-operate?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

**B3. Please provide details of why you think the Local Plan, or part of the plan, is or is not legally compliant, sound and/or complies with the duty to co-operate.**

AS DRAFTED, POLICY CR9 IS INCONSISTENT WITH THE APPROACH TO THE PROTECTION OF DESIGNATED AND NON-DESIGNATED HERITAGE ASSETS AS SET OUT IN NATIONAL PLANNING POLICY.

THE PLAN IS THEREFORE UNSOUND BEING NEITHER CONSISTENT WITH NATIONAL POLICY NOR JUSTIFIED, AS IT IS NOT THE MOST APPROPRIATE STRATEGY.

PARAGRAPH 133 OF THE NPPF ALLOWS ‘SUBSTANTIAL HARM’ TO THE SIGNIFICANCE OF A DESIGNATED HERITAGE ASSET TO ARISE WHERE IT CAN BE DEMONSTRATED THAT THE SUBSTANTIAL HARM OR LOSS IS NECESSARY TO ACHIEVE SUBSTANTIAL PUBLIC BENEFITS THAT OUTWEIGH THAT HARM OR LOSS.

PARAGRAPH 134 OF THE NPPF INDICATES THAT ‘LESS THAN SUBSTANTIAL HARM’ SHOULD BE WEIGHED AGAINST THE PUBLIC BENEFITS OF A PROPOSAL THAT AFFECTS A DESIGNATED HERITAGE ASSET, INCLUDING SECURING THE OPTIMUM VIABLE USE OF THAT HERITAGE ASSET.

PARAGRAPH 135 OF THE NPPF CONFIRMS THAT WHEN WEIGHING APPLICATIONS THAT DIRECTLY OR INDIRECTLY AFFECT NON-DESIGNATED HERITAGE ASSETS, A BALANCED JUDGEMENT WILL BE REQUIRED HAVING REGARD TO THE SCALE OF ANY HARM OR LOSS AND THE SIGNIFICANCE OF THE HERITAGE ASSET.

IN EACH CASE HARM MAY BE ACCEPTABLE IF IT IS OUTWEIGHED BY BENEFITS INCLUDING PUBLIC BENEFITS. IN CONTRAST, DRAFT POLICY CR9 (WHICH ESSENTIALLY DEALS WITH NON-DESIGNATED HERITAGE ASSETS) REQUIRES THAT DEVELOPMENT SHOULD NOT RESULT IN THE LOSS, OR HAVE A DETRIMENTAL EFFECT ON THE CHARACTER, OF THE AREAS THAT POLICY CR9 APPLIES TO. THIS IS AN ABSOLUTE RESTRICTION, IN CONTRAST TO THE PLANNING ASSESSMENT OF HARM AGAINST PUBLIC BENEFITS THAT THE NPPF ADVOCATES.

*Please continue on another sheet if necessary*

**B4. Please set out the modifications that you think would make the Local Plan, or part of the plan, legally compliant and/or sound. Please provide specific wording where possible.**

AMEND POLICY CR9 BY REVISING THE FINAL PARAGRAPH TO READ AS FOLLOWS:

*“CR9: TERRACED HOUSING IN CENTRAL READING*

THE CHARACTER OF THE FOLLOWING AREAS OF TRADITIONAL TOWN CENTRE TERRACED HOUSING WILL BE RESPECTED:

- CR9A: BLAKES COTTAGES
- CR9B: CRANE WHARF
- CR9C: QUEEN’S COTTAGES
- CR9D: SACKVILLE STREET & VACHEL ROAD
- CR9E: STANSHAW ROAD

DEVELOPMENT SHOULD NOT RESULT IN A LOSS, OR HAVE A DETRIMENTAL EFFECT ON THE CHARACTER OF, THESE AREAS OTHER THAN WHERE PROVIDED FOR IN NATIONAL PLANNING POLICY.”

*Please continue on another sheet if necessary*

**B5. If you are seeking a modification to the plan, do you wish to appear in person at the public examination?**

Yes  No

**B6. If you wish to appear in person, please briefly outline why you consider this necessary.**

N/A

**B7. Do you wish to be kept informed of planning policy matters?**  
(please tick as appropriate)

Please keep me informed of the progress of this Local Plan:

Please keep me informed of all planning policy matters: