

REPRESENTATIONS MADE ON MAIN MODIFICATIONS TO THE LOCAL PLAN

This document contains full copies of the representations made on the Main Modifications to the Local Plan, as part of the consultation held between 12th June and 24th July 2019.

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.

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MM1	21	CC1	Allen, Philip
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MM4	24-25	CC4 and 4.1.12-4.1.18	SEGRO; SH Reading Master LLP
MM5	32	CC9 and 4.1.50	Allen, Philip; Mapletree Investments Pte Ltd; McKay Securities PLC; SEGRO; Sport England; University of Reading
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MM15	65-66	EM1, 4.3.6 and 4.3.7	Caversham and District Residents' Association; Mapletree Investments Pte Ltd; McKay Securities PLC; SEGRO
MM16	69	EM3 and 4.3.13	McKay Securities PLC
MM17	72-73, 217- 219, 229, 244-245	H1, Figure 10.1, 11.1.4 and Figure 11.1, Appendix 1	Allen, Philip; Highways England
MM18	74-75	H2, 4.4.6 and 4.4.14	SGN and Danescroft; University of Reading; Viridis Real Estate Services Ltd
MM19	76-78	H3, 4.4.20 and 4.4.23	Allen, Philip; Home Builders Federation
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MM22	94-95	4.4.95-4.4.98	Unite Group plc; University of Reading
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MM26	99	TR2	Oxfordshire County Council

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MM32	120	4.7.26	Caversham and District Residents' Association; Reading Conservation Area Advisory Committee
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MM45	154-157	CR13a and 5.4.28	Caversham and District Residents' Association; Reading Conservation Area Advisory Committee
MM46	155	CR13b	Environment Agency
MM47	155	CR13c	Viridis Real Estate Services Ltd
MM48	155	CR13d	Environment Agency; SGN and Danescroft
MM49	161	CR14m	-
MM50	161	5.3.34	-
MM51	164	CR16	-
MM52	170	SR1a	Environment Agency; SEGRO
MM53	177	SR4e and SR4f	-
MM54	178, 193, 200- 201, 209-210	6.3.15, 7.3.14, 8.3.3, 9.3.3	-
MM55	180	SR5 and 6.3.20	-

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MM56	185	WR2	Sport England
MM57	194-195	WR4	-
MM58	198	CA1a	University of Reading
MM59	199-200	CA1b	Ainley, Jonathan; Anley, Ann; Andrew, Lorna; Ansell, Julian; Barclay, Belinda; Barclay, JD; Beasley, Anna; Bishop, Pamela; Bishop, Rob; Breadmore, Mr and Mrs G; Brooks, Michael; Byrne, Brendan; Calder, Colin; Capstick, David; Carter, Mr and Mrs; Caversham and District Residents' Association; Chandler, Daniel; Cooper, Mr and Mrs; Cushley, Jim; Dyer, Thomas; Fairfax and Reading Golf Club; Fletcher, Emma; Gandhi, Lokesh; Garrett, Clyde and Maureen; Garson, John; Gater, Jonathan; Grashoff, Andrea; Grashoff, Cllr Clare; Grashoff, Greg; Grashoff, Sam; Hambleton, Amy; Hanshaw, Chris, Heather and Ruby; Harrison, Barbara; Hicks, JM; Higgins, Gwen; Higginson, Sheila; Holmes, J; Howard, B; Hudson, Rachel; Hussey, David; Hussey, Susan; Hylton, Sheila; Iisley, Sandra; Jackson, Mr M and Mrs C; Jones, Nick; Jones, Richard; Josif, Andreas; King, Gillian and Denis; Lang, Graeme; Lawson, Ian; Lawson-Mudge, Jane; Lawson-Mudge, Luke; Lunn, Sue; Matthew, Andrew; Milligan, Des; Morgan, Ian; Morgan, Shen; Morley, David; Morley, Briony; Morley, Philip; Mudge, PW; Mustill, Richard; Neo, C; Neo, H J; Nutley, Jim; Orr, Clive; Page, Cameron; Page, Rob; Palarczyk, Ryszarda; Parry, Richard; Rendell, Peter; Roberts, Sue; Rodda, Matt; Scammell, Toby; Smith, Bill; Smith, Harvey; Smith, Peter and Linda; Sport England; Sun, Hualin; Taggart, Ryan; Teer, Sigi; Teer, Trevor; Treder, Mark and Geraldine; Waite, Pip; Wakely, Nigel; Wheeler, Robert
MM60	199	CA1d	-
MM61	200	CA1f	-
MM62	201-202	CA2	BBC; Caversham and District Residents' Association; Reading Conservation Area Advisory Committee
MM63	205	9.2.7	University of Reading
MM64	207	ER1c	University of Reading
MM65	211-212	ER2 and 9.3.10	Sport England; University of Reading
MM66	Map A	Proposals Map	-
MM67	Map F	Proposals Map	University of Reading
Sustainability Appraisal			Highways England; SEGRO; University of Reading
Confirmation of no comments			Natural England; National Grid; Surrey County Council; Transport for London
Comments not specifically related to a Main Modification			BBOWT; Brommell, Martin; Historic England; Hutt, Keith;

AINLEY, JONATHAN

Reading Borough Council
 Main Modifications to the Local Plan
 June 2019
 Representations Form



Please return by Wednesday 24th July 2019 to: Planning Policy, Civic Offices,
 Bridge Street, Reading, RG1 2LU or email planningpolicy@reading.gov.uk

PART A - YOUR DETAILS

Personal Details

Agent's Details *(if applicable)*

Title	MR	
First Name	JONATHAN	
Last Name	AINLEY	
Job Title <i>(if applicable)</i>		
Organisation <i>(if applicable)</i>		
Address 1	[REDACTED]	
Address 2	[REDACTED]	
Address 3		
Town	[REDACTED]	
Post Code	[REDACTED]	
Telephone	[REDACTED]	
E-mail	[REDACTED]	

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

B1. To which Main Modification does this representation relate?

CA 16 / READING GOLF CLUB

B2. Do you consider that the Local Plan as changed by the Main Modification(s):
(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"/>
Fulfil 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, as changed by the Main Modification(s), is or is not legally compliant, sound and/or complies with the duty to co-operate.

My concern is that the wording as it stands is open to mis-interpretation by developers. The original wording states that the small area of land could be put into the local plan on the basis that Reading Golf Club either re-designed the course or purchased land nearby to accommodate the two holes they would lose through development of part of holes 1 and 18. RGC have made it quite clear to the members and the general public via press releases that they fully intend to leave the site altogether to move to Caversham Heath and they expect that the entire golf course will be turned into a housing estate, not just the CA16 area.

As such the wording needs to be modified slightly to ensure as far as possible that golf remains on the site and the Emma Green and Caversham road / sewage / school / medical services are not over-run

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, as changed by the Main Modification(s), legally compliant and/or sound. Please provide specific wording where possible.

New clubhouse - This must be a permanent structure, not just a portacabin, "a permanent structure adjacent to and facing the remainder of golf club land, providing at least the same facilities, bar, function room, shop, and of the same size as the present clubhouse".

The provision of a 9-hole golf course and a family friendly golf facility should be detailed as a permanent feature. As we all know, the golf club have no intention of maintaining this land for golf, they just want to sell the whole lot for housing. Therefore the local plan must state that a permanent golf facility must be established.

The Local Plan must state that RGC shall maintain the security of the site. They have said they intend to leave, but if they do and abandon the land, who is responsible for protecting the site from travellers, for instance?

Please continue on another sheet if necessary

Continued on next page.

B5. 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:

Continuing from previous page.

Security of the site that the golf club abandon should have a legal requirement put on it for RGC to maintain security fencing and site patrols.

The local plan should reference the tree preservation orders and should clearly state that all trees on the site shall be protected by TPO.

I would like to see the Inspectors wording modified as per the red text.

" Residential development on the part of the RGC site identified as CA16 is dependent on ensuring the future use of the remaining land for golf, in line with the need to protect important sports and leisure facilities set out in policy RL6. Development will need to be careful to ensure that **safe** vehicular access from suitable roads continues to be provided to the remaining golf uses to ensure that they remain operable. A legal agreement will be necessary to ensure that the golf function is retained **permanently**, and development for residential will not take place until a replacement clubhouse, **healthcare and adequate parking** is provided and vehicular access from suitable roads is in place".

Many thanks

Jonathan Ainley

ALLEN, PHILIP

From: [Philip Allen](#)
To: [Planning Policy](#)
Subject: Local Plan
Date: 22 July 2019 22:26:41

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

I would like to object to the soundness of the "Independent" inspector's revised local plan. MM1 policy cc1 stopping the Council from insisting that development produces Economic, Social or Environmental improvement for the area conflicts with objectives 1; 14,16 & 19 as The people of Reading suffer the pollution, congestion, strain on services, loss of recreation & loss of a healthy environment resulting from development while the developer extracts vast amounts from the local economy.

MM5 cc9 4.1.50 Not able to recover the costs of monitoring & enforcing development conflicts with objectives 1,6,16,19 (unless the costs can be charged as part of the planning application fees) Not getting a contribution for Social housing from business development conflicts with objectives 13, 16, 19

mm19 H3 4.4.20-23 All (not just major) development should contribute 30% to social housing on-site (or in finance for minor developments) to be equitable so conflicts with 13, 16 & 19

mm21 H5 4.4.36 All development especially commercial should meet minimum standards of Net Zero Carbon as we hope to escape the Climate Emergency we are in because **all development increases climate change as buildings, Roads & Bare ground turn the sun's energy into extra heat (This fact has been known for 100 years but not included in objective one)** which is then trapped by the extra greenhouse gases emissions from the development. objective 1, 19

The policy to impose an annual figure for house building instead of the average over the plan period conflicts with all objectives as it will encourage developers to wait until the end of the year then submit damaging proposals. What happens when the property, economic & finance bubbles burst?

Philip Allen



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ANDREW, LORNA

Reading Borough Council
Main Modifications to the Local Plan
June 2019
Representations Form



Please return by Wednesday 24th July 2019 to: Planning Policy, Civic Offices, Bridge Street, Reading, RG1 2LU or email planningpolicy@reading.gov.uk

PART A - YOUR DETAILS

Personal Details

Name: Ms Lorna Andrew

Address:

Telephone:

Email:

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

B1. To which Main Modification does this representation relate?

Referring to the modified CA1b wording

B2. Do you consider that the Local Plan as changed by the Main Modification(s):
(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, as changed by the Main Modification(s), is or is not legally compliant, sound and/or complies with the duty to co-operate.

Referring to the modified CA1b wording:

1. The removal of the need to replace the land lost through development on CA1b with land for two replacement holes is in contravention of Policy RL6.
2. The future provision of golf on the remaining land is not ensured by the plan.
3. When referring to the new healthcare provision this does not ensure that the provision will be adequate
6. The onsite provision of open space should be clearly defined.
7. Road safety is of serious concern and not sufficiently mitigated in the plan.
8. The paragraph dealing with mitigation of the impact on the highways should give a clear indication of what measures would be acceptable.
9. Reference to the Tree Preservation Order (TPO) should be clear that ALL trees of whatever size or species are protected by the TPO.
10. A legal requirement to maintain permanently all boundaries and the complete security of the whole of the remaining Golf Club land must be required.
11. The parking requirements should be clearly defined and take account of the proposed healthcare facility and the new golf clubhouse.
12. The number of dwellings originally included in the submission for CA1b was 90-130 dwellings. With new requirements being included for a new clubhouse and a healthcare facility the overall number of dwellings should be reduced.
13. Air pollution and traffic assessments for CA1b were carried out in 2015, they are out of date and should be done again.

A large, empty rectangular box with a thin black border, occupying the upper half of the page. It is intended for the user to provide specific wording for modifications to a Local Plan.

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, as changed by the Main Modification(s), legally compliant and/or sound. Please provide specific wording where possible.

1. The requirement for a new clubhouse should define it as “a permanent structure adjacent to and facing the remainder of the golf club land similar in style and character to the current clubhouse providing at least the same facilities and of a size commensurate with the new golf offering”
2. A requirement to purchase adjacent land to provide 2 new holes should be included.
3. The future provision of golf on the remaining land is not ensured by the plan, it should be qualified by “to include a permanent family friendly golf offering on the land within the Reading Borough and a permanent nine-hole golf course on the land within South Oxfordshire, as proposed in the Reading Golf Club/Wates submission to the Inspector”
4. Addition of the word “entire” to the phrase “on the remainder of the *entire* Golf Club site” would be beneficial.
5. When referring to the new healthcare provision it should be qualified with wording that indicates the size and scale of the provision, including metrics based on the proposed number of dwellings.
6. Define the area of ‘Open Space’ clearly with metrics.

The Government Inspector has also recommended that a new paragraph (ref. 8.3.2) is added to improve the soundness of the Draft Local Plan.

The Inspector’s wording is as follows and I agree with local pressure group KEG that the wording in red italics. as below, is added:

“Residential development on the part of the Reading Golf Club site identified as CA1b is dependent on ensuring the future use of the remaining land for golf, in line with the need to protect important sports and leisure facilities set out in Policy RL6. Development will need to be careful to ensure that *safe* vehicular access from suitable roads continues to be provided to the remaining golf uses to ensure that they remain operable. A legal agreement will be necessary to ensure that the golf function is retained *permanently*, and development for residential will not take place until a replacement clubhouse, *healthcare and adequate car parking* is provided

Please continue on another sheet if necessary

B5. 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:

ANLEY, ANN

From: Ann Anley
Sent: 23 July 2019 09:47
To: Planning Policy
Subject: Reading Local Plan, Policy CA1b

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

The following suggestions relate to the SOUNDNESS of the plan as requested by Reading Borough Council. It follows the recommendations put forward by Keep Emmer Green, which I wholeheartedly endorse

Comments and Main Change Recommendations

Referring to the modified CA1b wording:

1. It is disappointing that the requirement for two new holes has been removed particularly since it is believed that Reading Golf Club have only made one attempt to buy new land in South Oxfordshire back in 2015. The removal of the need to replace the land lost through development on CA1b with land for two replacement holes is in contravention of Policy RL6.
2. The requirement for a new clubhouse should also define it as “a permanent structure adjacent to and facing the remainder of the golf club land similar in style and character to the current clubhouse providing at least the same facilities and of a size commensurate with the new golf offering”
3. The future provision of golf on the remaining land should be qualified by “to include a permanent family friendly golf offering on the land within the Reading Borough and a permanent nine-hole golf course on the land within South Oxfordshire, as proposed in the Reading Golf Club/Wates submission to the Inspector”
4. Addition of the word “entire” to the phrase “on the remainder of the *entire* Golf Club site” would be beneficial.
5. When referring to the new healthcare provision this should be qualified with wording that indicates the size and scale of the provision for example, “for new healthcare facility to house General Practitioners and the necessary associated medical infrastructure.”
6. The onsite provision of open space is also welcomed but size of the area should be clearly defined.
7. Road safety in the vicinity of the CA1b site is of paramount importance and the risk of accidents and injury, particularly to younger children, around Emmer Green Playing Fields and the Childrens Playground on Kidmore End Road, is of serious concern.
8. The paragraph dealing with mitigation of the impact on the highways should give a clear indication of what measures would be acceptable.
9. Reference to the Tree Preservation Order (TPO) should be clear that ALL trees of whatever size or species are protected by the TPO.
10. A legal requirement to maintain permanently all boundaries and the complete security of the whole of the remaining Golf Club land must be required.
11. The parking requirements should be sufficient for the new Healthcare Facility and the new Golf Clubhouse. For example, Emmer Green Surgery currently have 27 parking spaces (acknowledged to be insufficient) and Reading Golf Club have 97 spaces plus overspill on the current site.
12. The number of dwellings originally included in the submission for CA1b was 90-130 dwellings. Now that it is clear that the New Clubhouse and New Healthcare Facility, both with suitably sized car parks, must be within CA1b the number of dwellings should be reduced.
13. Air pollution and traffic assessments for CA1b were carried out in 2015. These assessments are out of date, since when the traffic in Emmer Green and Caversham has increased significantly. Not least following the construction of over 100 new homes in Sonning Common within the last 12 months.

The Government Inspector has also recommended that a new paragraph (ref. 8.3.2) is added to improve the soundness of the Draft Local Plan.

The Inspector's wording is as follows and the addition of the wording in red italics as below is suggested:

“Residential development on the part of the Reading Golf Club site identified as CA1b is dependent on ensuring the future use of the remaining land for golf, in line with the need to protect important sports and leisure facilities set out in Policy RL6. Development will need to be careful to ensure that *safe* vehicular access from suitable roads continues to be provided to the remaining golf uses to ensure that they remain operable. A legal agreement will be necessary to ensure that the golf function is retained *permanently*, and development for residential will not take place until a replacement clubhouse, *healthcare and adequate car parking* is provided and vehicular access from suitable roads is in place.”

Regards

Ann Anley

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ANSELL, JULIAN

From: julian ansell
Sent: 23 July 2019 12:19
To: Planning Policy
Subject: RBC Local Plan

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

Reading Borough Council Local Plan
Consultation on main modifications

I wish to make the following comments in connection with the modifications to the Local Plan.

Reading Golf Club Ltd. have abandoned all pretence that they intend to build only on the area CA1b and have now publicly confirmed that it is their intention to develop the whole of their land for housing. An extract from a recent article in the Henley Standard confirming this is set out below. The various conditions attached to the CA1b entry are therefore no longer applicable and for these reasons the inclusion of CA1b in the Reading Local Plan makes it unsound. I would urge that further consideration be given to removing the entry, notwithstanding the lateness of this action. Removal will enable the club to make a comprehensive planning application covering the whole of the land.

In the event that the entry is not removed I make the following comments regarding the proposed entry for CA1b to improve the soundness of the plan:-

- The requirement to replace the existing clubhouse should be strengthened to ensure that it is a permanent structure, within the area of CA1b, suitable for the sporting and recreational facilities being proposed.
- The requirement for an area of open space should be clearly defined as to size and content.
- Road safety is of prime importance given the close proximity of the children's playground and the recreation field. The roads are narrow and the risk of injury is high. The need for adequate safety measures must be included in the wording.
- The requirement that the Club acquire land to replace the two lost holes should be re-instated. No recent efforts appear to have been made by the Club to acquire adjacent land.
- On site parking should be adequate to cater for the housing and also the leisure facilities so as to ensure that street parking is unnecessary.
- The requirement for a healthcare facility must be clearly defined regarding size and facilities.

Regards

Julian Ansell

The following extract is from the Henley Standard June 2019

'Reading Golf Club is working with Fairfax Acquisitions, of West Sussex, which hopes to build up to 700 homes on the land.

Almost four acres of the site are earmarked for 130 homes in Reading Borough Council's draft local plan.

The rest of the site was put forward as a "strategic housing site" in South Oxfordshire District Council's new local plan but it was not included in the final document.

The club has not revealed how much it would receive from the sale of the land but says it would use some of the money to fund the move. The club's board agreed the departure date at a meeting last week.

Club chairman Colin Reed said: "The over-provision of golf in the immediate region, combined with a downturn in the number of golfers nationally, has meant that something radical must happen to ensure the survival of both golf clubs.

"We have budgeted to absorb these losses for two seasons but unfortunately some large, unexpected and unwarranted legal challenges have brought the financial position to such a point that the move cannot be delayed beyond March 31, 2021.

"The land in Emmer Green has been identified for future housing development and funds from the club's development partners are being used to ensure a long-term sustainable model at Caversham Heath Golf Club."

He said people should welcome the opportunity for "much-needed family housing, including affordable homes, with significant publicly accessible open space". Mr Reed said: "We understand that for development to happen, appropriate traffic improvements, coupled with an essential new medical facility, will be required and this should help to offset some of the concerns over the development. That, however, is for the council to work on.

"It will, without doubt, be a sad day for the club when we leave Emmer Green, but the golfing industry is facing some challenging times and unfortunately our current home does not allow us the opportunity and space required to meet modern requirements.

"Clubs with standalone 18-hole courses and little to no additional facilities are facing the greatest challenges for survival and we are not prepared to let this 109-year-old club be another sad statistic.

"The bold steps the board and its members have been prepared to take will ensure the legacy of both clubs long into the future. With Caversham Lawn Tennis Club also considering a move on to adjacent land, the prospect of a regionally renowned 'sporting hub' is a real possibility."

The new combined club will be renamed Reading and Caversham Heath Golf Club.'

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BARCLAY, BELINDA

From: Belinda Barclay
Sent: 18 July 2019 12:53
To: Planning Policy
Subject: Reading Local Plan, policy CA1b-----concerning development at Reading Golf Club, Emmer Green.

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

To whom it may concern:

I am writing to you concerning my grave concerns for the soundness of the above plan.

I understand that residential development on part of the Reading Golf Club --CA1b--is dependent on ensuring the future of the remaining land for golf use in line with Policy RL6, and that any land lost for development (ie the 2 holes) is to be replaced, also as in Policy RL6.

Also that a replacement Clubhouse (a permanent structure with at least the same facilities as existing, and facing the golf club land) and Health Care facilities are provided before any other development takes place.

The Healthcare facilities need to be relevant as in General practitioners, and associated healthcare professional and infrastructure. Caversham and Emmer Green have lost 2 surgeries recently and are greatly inconvenienced by the lack of appropriate health resources.

Both the Clubhouse and healthcare facility will need adequate parking and access, as the area around the golf course is already overused by non-resident parking.

Access to and from the CA1b site is of serious concern, for the safety of pedestrians and other road users. The risk of accidents and injury is high. There are already various road accesses onto Kidmore End Road in the area and traffic is already heavier than previously with increased traffic from new housing in Sonning Common and Oxfordshire. It also of course has 2 bus routes, with stops very near the Golf Club. Children walk back and forth to the 3 local schools and the bus stops to schools in reading and families with children go to the Emmer Green playing Fields and Children's playground, also using local roads for parking.

Because of the increased space needed for the Clubhouse, Health Centre and their parkings and access roads there obviously will be less space for the original suggestion of 90-130 dwellings, this figure must therefore be drastically reduced.

It should be ensured a legal requirement is present so that all boundaries and land of the Golf Club be permanently maintained and made safe, and that all trees with TPO should be protected and reference to their status made very clear.

The Reading Golf Club land is the main green area in Emmer Green and has associated wildlife, it is also vital to reduce the effects of the increasing air and traffic pollution and should be maintained.

Yours sincerely

Belinda Barclay

BARCLAY, JD

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

Dear Sir or Madam,

RBC Local Plan, Consultation on main modifications June 2019

My comments below are on the Consultation, with particular reference to “Part of Reading Golf Club CA1b, Main Modification MM59”

- The requirement for two new golf holes, to replace those lost, should be retained.
- The new Clubhouse should be a permanent structure providing at least the same facilities as the old Clubhouse.
- Addition of the word “entire” to the phrase “on the remainder of the entire Golf Club site.” would be helpful.
- The new healthcare provision should be defined in size and scale. eg “for new Healthcare facility to house GPs and the necessary medical infrastructure”.
- The onsite provision of open space could be defined.
- Road safety in the vicinity of the CA1b site is of huge importance, particularly to young children around Emmer Green recreation ground and playground on Kidmore End Road.
- Reference to the Tree Preservation Order should be clear that all trees are protected.
- The parking requirement for the new Healthcare Facility and Golf Clubhouse should be adequate. For example Emmer Green Surgery has 27 spaces and the existing Golf Club 97 spaces.
- Since CA1b will now contain a Clubhouse and Health Facility, the number of new houses permitted should be reduced.

Yours Faithfully,

Jon Barclay

Mr J D Barclay.

BBC

23rd July 2019

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
Lambert Smith Hampton
United Kingdom House
180 Oxford Street
London
W1D 1NN

Dear Sir or Madam,

Representations on behalf of British Broadcasting Corporation (BBC) – Main Modifications to the Reading Borough Local Plan (June to July 2019)

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 Draft Local Plan Main Modifications Consultation (running from June to July 2019), specifically at Policy CA2: Caversham Park.

This representation is made on the grounds that even with the Main Modifications as proposed in the consultation document, the Draft New Reading Borough Local Plan is unsound. The reasons for this are set out below.

POLICY CA2: CAVERSHAM PARK – DEEMED TO BE UNSOUND

On 26th January 2017, we made representations with regards the Reading Borough Council Pre-Submission Draft Reading Borough Local Plan (November 2017) on behalf of BBC.

This representation again 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 will therefore be selling the land after inviting prospective parties to bid.

We have reviewed the proposed Main Modifications (this consultation); and whilst we welcome the proposed new wording which includes “*or other suitable use compatible with its heritage*”, where previously the draft policy just stated that the changes would be to “*residential and/or a cultural, community or heritage use*”; we believe the Policy is still unsound.

The Policy is still too restrictive where it still states that the policy does not allocate the site for additional development over and above conversion of the house and where it still includes the estimated number of new dwellings that could be accommodated in a conversion of the Listed Building house. Even though the proposed Main Modification adds that “*it is currently estimated that up to 40-45 dwellings could be accommodated*”, there is no benefit in providing this prescriptive, specific and narrow number range, without robust supporting evidence to support this.

Planning Officers determining an application would by default refer to this narrow range number/allowance, without valid evidence or details of justifying this specific quota. Any proposal must be determined based around the specifics. With such a large and complex building, the potential numbers of new homes that can be accommodated within it will vary considerably depending on the type and size of the units being delivered.

We note that there is indeed an increased (and recognised) national government desire to deliver housing in sustainable locations. We believe that against this national planning policy context, with the Governments housing objectives to deliver more dwellings being clear; Policy CA2: Caversham (as worded and as draft modified) is unsound.

The wording for Policy CA2 would allow Planning Officers to take an obstructive position, running counter to/against sustainable development objectives that would help the Borough meet the objectively assessed housing development needs.

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.

The Revised NPPF (2018, as amended) makes it abundantly clear where it states (paragraph 123) that:
"Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decision avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site."

With the above points in mind, we request that the Policy be further modified to remove any specific number of new dwellings that 'could' be accommodated in the Listed House, as this is too restrictive; and we request that the Policy is modified so that there is no wording referring (negatively) to 'additional development over and above conversion of the house'. This is again too obstructive and runs counter against the national level policies within the NPPF.

Yours sincerely,

A black rectangular redaction box covering the signature of Thaddaeus Jackson-Browne.

Thaddaeus Jackson-Browne MRTPI

Associate Director

Direct Line: 0207 198 2096

Email: tjackson-browne@lsh.co.uk

BBOWT

From: Sam Cartwright <samcartwright@bbowt.org.uk>
Sent: 24 July 2019 12:25
To: Planning Policy
Subject: BBOWT response to Main Modifications to the Local Plan

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

Dear Planning Policy Team,

Thank you for the opportunity to provide comment on the Planning Inspector's Main Modifications to the Local Plan. As a nature conservation charity our comments relate specifically to biodiversity and ecology.

General Comment Regarding Compliance with 2019 NPPF

We note that the modifications that have been made refer to the requirements of the 2018 NPPF. This has now been superseded by the 2019 NPPF, which has more stringent wording in relation to biodiversity net gain. In particular, where the 2018 NPPF referred to the need for plans and decisions to deliver "*biodiversity net gain where possible*", the 2019 NPPF removes this 'optional' element of the requirement and instead stipulates that plans should "*pursue opportunities for securing measurable net gains for biodiversity*" and in respect of planning decisions, it stipulates that "*opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity*".

There are numerous references in the Draft Local Plan spatial policies to "*avoid a net loss of biodiversity, and provide for a net gain where possible*" and in the general policy EN12 (Biodiversity and the Green Network) it is stated "*On all sites, development should not result in a net loss of biodiversity and geodiversity, and should provide a net gain for biodiversity wherever possible*". This appears to be significantly out-of-date wording given the requirements of the 2019 NPPF and the Government's statements this year on this matter, including the publicly-stated intention to mandate biodiversity net gain for new development in the forthcoming Environment Bill.

Furthermore, the Draft Local Plan makes only one confusing reference to measuring biodiversity net gain in Policy EN12: "*Provision of off-site compensation shall be calculated in accordance with nationally or locally recognised guidance and metrics*". It is our understanding that in the first instance biodiversity impact should be measured objectively with an approved metric and submitted for scrutiny alongside any planning application likely to have an impact, not just those deemed to require off-site biodiversity compensation. We therefore feel the wording of Policy EN12 in relation to securing measurable biodiversity net gains is not compliant with the 2019 NPPF.

We hope you find these comments helpful and would be happy to provide further clarification should that be helpful.

Yours faithfully,
Sam Cartwright.

Dr Samantha Cartwright MCIEEM
Senior Biodiversity & Planning Officer (Berks)
Berks, Bucks & Oxon Wildlife Trust
01628 829574 Ext 209
samcartwright@bbowt.org.uk
Hasker House, Woolley Firs, Cherry Garden Lane, Maidenhead, SL6 3LJ

From: Burr, Sarah [mailto:Sarah.Burr@reading.gov.uk]
Sent: 12 June 2019 12:30
To: Planning Policy
Subject: Reading Borough Local Plan – chance to comment on Main Modifications to the Local Plan

BEASLEY, ANNA

From: Anna Beasley
Sent: 23 July 2019 15:43
To: Planning Policy
Subject: Local Plan consultation CA1b (Reading Golf Course)

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

Dear Sir,

- *Take measures to mitigate impacts on the highway network, particularly on Kidmore End Road and Tanners Lane;*
- *Include all parking requirements within the*

- *Take measures to mitigate impacts on the highway network, particularly on Kidmore End Road and Tanners Lane;*
- *Include all parking requirements within the*

I wish to further comment on the modified local plan with regard to CA1b (Reading Golf Course, Emmer Green). The modified plan states that:

“Development should:

.....

- Take measures to mitigate impacts on the highway network, particularly on Kidmore End Road and Tanners Lane

.....”

This refers to the immediate area affected by the development. It is a rather non-committal, advisory statement which the developers can and will ignore, or at best provide a roundabout to smooth the traffic flow to and out of the development. The real problem is, as always, further away in Caversham. The bottleneck through Caversham and the two bridges is not going to be dealt with, yet this will potentially be one of several recent housing estates built north of the River Thames. The traffic jams now regularly stretch from the junction of Henley Road and Peppard Road in Caversham to Buckingham Drive in Emmer Green. Stationary traffic pollutes the air for all residents living along that route and in Caversham itself. Wouldn't it be reasonable to solve that problem before granting any planning permissions for development in and around Caversham?

Anna Beasley

- *Take measures to mitigate impacts on the highway network, particularly on Kidmore End Road and Tanners Lane;*
- *Include all parking requirements within the site to*

- *Take measures to mitigate impacts on the highway network, particularly on Kidmore End Road and Tanners Lane;*
- *Include all parking requirements within the site to*

BISHOP, PAMELA

Reading Borough Council
 Main Modifications to the Local Plan
 June 2019
 Representations Form



Please return by Wednesday 24th July 2019 to: Planning Policy, Civic Offices,
 Bridge Street, Reading, RG1 2LU or email planningpolicy@reading.gov.uk

PART A - YOUR DETAILS

	Personal Details	Agent's Details <i>(if applicable)</i>
Title	Mrs	
First Name	Pamela	
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 Main Modification does this representation relate?

MM59, pages 199-200, CA1b

B2. Do you consider that the Local Plan as changed by the Main Modification(s): (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 type="checkbox"/>

B3. Please provide details of why you think the Local Plan, or part of the plan, as changed by the Main Modification(s), is or is not legally compliant, sound and/or complies with the duty to co-operate.

The new EM001 (regarding CA1b) wording states: **“Take measures to mitigate impacts on the highways networks, particularly on Kidmore End Road and Tanners Lane.”** The addition of **“and Tanners Lane”** does not change the fact that the increase of about 200 cars from the proposed CA1b housing development to the traffic already using Peppard Road will **make the queues at the junction of Peppard Road and Henley Road even longer**. It will also make the **air pollution even more illegal** than it presently is.

There is no way around this. The Council must surely accept the reality that further building of dwellings north of the river will make the present unacceptable situation even worse, unless the Council builds a bypass to the north that links in with a third bridge crossing (between Sonning Bridge and Reading Bridge). I live in Grosvenor Road (a private road that I pay for) and I have to put up with my road being used as a rat run by drivers that are fed up having to sit in the queue of traffic to the lights at the Peppard Road/Henley Road junction. The rat-run traffic has got worse over the years. There was a big increase when Bugs Bottom was built and the extra traffic from CA1b will cause another surge. This is completely unacceptable! The idea that “measures to mitigate impacts on the highways networks” must be taken, is a joke! I can predict what will happen - the Council will tweak the road and pavement width on Kidmore End Road as evidence of having “taken measures” whereas it does nothing to address the bigger problem.

The revised wording does nothing to make CA1b any better than before. It is unsound and is not legally compliant.

B4. Please set out the modifications that you think would make the Local Plan, or part of the plan, as changed by the Main Modification(s), legally compliant and/or sound. Please provide specific wording where possible.

Remove CA1b from the plan.

Please continue on another sheet if necessary

B5. 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:

BISHOP, ROB

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

B1. To which Main Modification does this representation relate?

MM59, pages 199-200, CA1b

B2. Do you consider that the Local Plan as changed by the Main Modification(s): (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, as changed by the Main Modification(s), is or is not legally compliant, sound and/or complies with the duty to co-operate.

This is regarding the transport aspect of CA1b.

The new EM001 wording states: **“Take measures to mitigate impacts on the highways networks, particularly on Kidmore End Road and Tanners Lane.”**

The addition of **“and Tanners Lane”** is insufficient to address the increase of circa 200 cars to the traffic feeding into Peppard Road (there is no other road that they can use), most of which will be wanting to cross the River Thames. **It CONTRADICTS the Transport strategies stated elsewhere in the Local Plan and is therefore unsound.**

Specifically, it contradicts the following strategies:

- In 4.5.1, it states that one of its objectives is **“to improve journey times, journey time reliability.....”**. Adding 200 cars to the existing traffic on the existing road network makes it worse, not better.
- In 4.5.4, it states that **“developments will be assessed for their impact upon the transport network, including local and trunk roads and motorway networks”**. The additional 200 cars will worsen the existing traffic flow, yet no significant road improvements for the route Peppard Road into Caversham town centre and over the two bridges (or any other related routes) have been included in the plan. This contradicts the **“remedial measures will be taken”** stated in the same paragraph, yet there is no mention of what these measures might be.
- In the last 20 years, there have been large housing developments and many in-fills. For example, Hemdean/Bugs Bottom was a development of 317 (growing ultimately to 372) homes and Lea Meadow (Sonning Common) was a development of 39 new homes. They all ultimately feed

into Peppard Road or Hemdean Road that, in turn, enter into the Caversham town centre. Yet there have been zero improvements to the road network. In the case of Hemdean/Bugs Bottom, in 2014 the Council provided information under a Freedom of Information request (your reference: 1754278) that states that: “£80k under Section 106 was contributed to transport improvements”. Nothing appears to have been done and, in any event, £80k is a trifling sum when considering the scale of the required improvements (a school was also promised and not delivered by the Council). There is no evidence in this Local Plan that the Council will act any differently regarding CA1b and this is unacceptable.

- ***Under the Freedom of Information Act, can the Council please supply me with the data and associated dates from your traffic models (both contemporary as well as the simulation of future scenarios)?*** To be clear, I wish to receive the actual data from your software application such as Vissim (from the PTV Group) or any other software that you use. The Council appear to believe that the current infrastructure can cope. I therefore wish to see for myself how the Council has reached that decision by examining your detailed and realistic simulation of the status quo of the traffic flow and impacts, with various what-if scenarios including tipping points.
- Furthermore, regarding 4.5.4, a by-product of the traffic jams on the Peppard Road is the rat run through Grosvenor Road [REDACTED] [REDACTED] I cherish the green space around the road. Children can walk safely to school and often play outside in the road. This is being threatened by drivers that use it as a cut-through from Peppard Road to Henley Road, down Donkin Hill into Caversham and the two bridges. The rat-run traffic has got worse. There was a big upsurge when Bugs Bottom was built and the in-fill developments north of the river has exacerbated the situation to an unacceptable level. Without a significant infrastructure improvement, the addition of a further 200 cars feeding into Peppard Road will cause another upsurge and make an unacceptable situation completely intolerable.
- In 4.5.12, it states that the “the M4 Smart Motorway will be implemented between 2017 and 2022”. It is a direct acknowledgement that journeys to/from London and other M4 corridor destinations are increasing. Reading contributes to this traffic, including that from South Oxfordshire. Indeed, traffic to/from the north have either Reading town centre as their destination or are crossing the two bridges to get to/from the A4/M4 or other M4 corridor destinations. Central government has partly addressed this with the M4 Smart Motorway and it should surely be matched by Reading Council to provide complementary improvements to the feeder road network. If this is not done, it is a bottleneck and will partly negate the motorway improvement. There is no mention of any complementary improvements in the Local Plan and the addition of a further 200 cars will make it even worse.

The above points are all part of the same problem and because it is not addressed in this plan, the revised wording is unsound.

B4. Please set out the modifications that you think would make the Local Plan, or part of the plan, as changed by the Main Modification(s), legally compliant and/or sound. Please provide specific wording where possible.

Add the following sentence:

“In addition, this development is subject to being able to achieve a substantial improvement in the traffic capacity of the highways networks from the Peppard Road, through Caversham town centre and across the two bridges. This development should not proceed until such an improvement has taken place.”

to the paragraph in CA1b that presently reads:

“Take measures to mitigate impacts on the highways networks, particularly on Kidmore End Road and Tanners Lane.”

Please continue on another sheet if necessary

B5. 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 Main Modification does this representation relate?

MM27, page 100, paragraph 4.5.8

B2. Do you consider that the Local Plan as changed by the Main Modification(s): (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, as changed by the Main Modification(s), is or is not legally compliant, sound and/or complies with the duty to co-operate.

The new EM001 wording states: "... the Council has also discussed the potential for park and ride in West Berkshire and South Oxfordshire with the relevant authorities over a number of years, but no sites have yet been formally proposed. Specific proposals will be supported by a business case showing the benefits of the scheme".

Regarding the potential South Oxfordshire Park and Ride sites, the localities identified on the map are unsound because:

- All research so far indicates that, without a dedicated bus lane, journey times are not faster than in a private car. When you add to that the time for the car driver to enter the site, park, walk to the shelter, wait for a bus and for the bus to depart, the total journey time is slower and is therefore a disincentive for motorists.
- The three potential routes of Peppard Road, Woodcote Road and Henley Road would all ultimately feed into the network of narrow roads leading through Caversham to the two bridges and they do not provide sufficient width for a dedicated bus lane. Only for some of its length would that be possible but that would mean cutting down mature trees and making pavements narrower. In any event, it would ultimately encounter pinch points in the Caversham town centre and the dedicated bus lane would be forced to merge with other road traffic.
- In addition, the Park and Ride schemes only makes sense for those commuters who have Reading town centre as their destination (either to catch a train or to work in the town centre). It does not make sense to those commuters who have an alternative destination. Therefore, the Park and Ride schemes north of the river will NOT provide a solution to traffic

jams.

- Lastly, the northern sites are likely to be very expensive to acquire, expensive to build and expensive to acquire a sufficient fleet of buses to provide frequent departures/arrivals (anything more than every 15 minutes is not viable). That's only the fixed costs. Then there are the operational costs of maintenance, staff, etc.

The new wording of **"Specific proposals (for the South Oxfordshire sites) will be supported by a business case showing the benefits of the scheme"** is unsound because it is very clear that there is no chance of a successful business case being made.

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, as changed by the Main Modification(s), legally compliant and/or sound. Please provide specific wording where possible.

Remove the words "and South Oxfordshire".

Please continue on another sheet if necessary

B5. 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:

Reading Borough Council
 Main Modifications to the Local Plan
 June 2019
 Representations Form



Please return by Wednesday 24th July 2019 to: Planning Policy, Civic Offices,
 Bridge Street, Reading, RG1 2LU or email planningpolicy@reading.gov.uk

PART A - YOUR DETAILS

	Personal Details	Agent's Details <i>(if applicable)</i>
Title	Mr	
First Name	Robert	
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 Main Modification does this representation relate?

MM59, pages 199-200, CA1b

B2. Do you consider that the Local Plan as changed by the Main Modification(s): (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, as changed by the Main Modification(s), is or is not legally compliant, sound and/or complies with the duty to co-operate.

This is regarding securing an important sports and leisure function. The new EM001 wording states: **“Development for residential and replacement clubhouse subject to the future provision of golf on the remainder of the Golf Club site”**. Later it also states: **“Ensure that vehicular access is provided from suitable roads to the area to be retained for golf”**. Later it also states: **“Include all parking requirements within the site....”**. Later it also states: **“Site size 3.75 hectares, 90-130 dwellings, community provision including healthcare and replacement clubhouse”**.

The new wording is unsound because it is insufficiently explicit to protect the future provision of golf, its associated clubhouse and parking within RBC’s land.

Reading Golf Club have stated in their 83-page proposal dated 15th October 2018 to the Council/Government Inspector how they intend to use the remaining RBC land using terms such as: “responsible management of the RBC land”, “responsible steward of its land”, “leaving an appropriate legacy”, “provision of a family golf/leisure facility”, “more short form, welcoming and inclusive format”, “ideal as a feeder facility”, “attractive to families and a par 3 course could be created”, “publicly accessible golf alongside a clubhouse on the remainder of the site”, etc., all of which applies to the RBC land, not SODC land.

This is also relevant because RBC do not have the assurance that the rest of the club’s golf offer (another clubhouse on SODC land) would be approved by SODC because this is outside RBC’s control.

The new **EM001** wording intends to ensure that the proposal would comply with

Policy RL6 whereas the relocation of the club to Caversham Heath Golf Club (located in South Oxfordshire, 3.1 miles away) clearly does not (not same catchment area, etc.).

But, as the **EM001** wording presently stands, there is not a sufficiently explicit statement that the golf facility is to be on RBC land and so it could in the future be interpreted as anywhere on the land currently owned by the club (including on SODC land). Also, there is no assurance that it is to be permanent. Neither of these two outcomes would be acceptable and would be contrary to the council's intentions. Even the wording: **"A legal agreement will be necessary to ensure that the golf function is retained"** does not go far enough.

Because this ambiguity may well become a future issue, the revised wording is unsound.

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, as changed by the Main Modification(s), legally compliant and/or sound. Please provide specific wording where possible.

Replace the paragraph in CA1b that presently reads:

“Development for residential and replacement clubhouse, subject to the future provision of golf on the remainder of the Golf Club site, which fulfils an important sports and leisure function for Reading, be secured.”

With:

“Development for residential and replacement clubhouse (**within the boundaries of CA1b**), subject to the **future permanent** provision of golf on the remainder of the Golf Club site **within RBC land**, which fulfils an important sports and leisure function for Reading, be secured.”

Please continue on another sheet if necessary

B5. 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:

Reading Borough Council
 Main Modifications to the Local Plan
 June 2019
 Representations Form



Please return by Wednesday 24th July 2019 to: Planning Policy, Civic Offices,
 Bridge Street, Reading, RG1 2LU or email planningpolicy@reading.gov.uk

PART A - YOUR DETAILS

	Personal Details	Agent's Details <i>(if applicable)</i>
Title	Mr	
First Name	Robert	
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 Main Modification does this representation relate?

MM59, pages 199-200, CA1b

B2. Do you consider that the Local Plan as changed by the Main Modification(s): (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, as changed by the Main Modification(s), is or is not legally compliant, sound and/or complies with the duty to co-operate.

This is regarding the impact of CA1b on local traffic. I submitted a previous submission in this respect on 18th June 2019. In the submission I requested traffic modelling information under the Freedom of Information Act and I am pleased to advise that I have since received the Council’s own Transport Modelling Report that now enables me to make additional comments.

The new EM001 wording states: **“Take measures to mitigate impacts on the highways networks, particularly on Kidmore End Road and Tanners Lane.”**

The addition of **“and Tanners Lane”** is hopelessly insufficient to address the increase of circa 200 cars to the traffic feeding into Peppard Road (there is no other road that they can use), most of which will be wanting to cross the River Thames. **It CONTRADICTS the Transport strategies stated elsewhere in the Local Plan and is therefore unsound.**

The Council’s own Transport Modelling Report confirms this as follows:

- In 2.6.4 on page 8: “... between the modelled base year, 2015 and the Local Plan forecast year, 2036, the growth is expected to be around 9%”. Then, in 2.6.5 on page 8 it states: “It has been decided not to apply this growth within either the Reference Case model or the Local Plan model”. It explains that by not applying it to both, it does not distort the figures. Agreed, but it misses the point. As I will explain shortly, the traffic near the proposed CA1b is already over capacity and it will therefore get worse by 9% even before any planned housing developments.
- Figure 3.1 Local Plan Sites on page 15: shows the development of CA1b yet it is not named in Table 3.1 on page 11 nor in Appendix A: Reading Local Plan Developments: Committed Developments on page 49. It infers

therefore that the additional traffic generated by this development has NOT been included in the 2036 Local Plan model. If that is not the case, then the forecast traffic will be even worse if CA1b goes ahead.

- Figure 4.8 (AM Peak Hour) on page 30 shows 4 junctions in/near Caversham where V/C (volume over capacity) is already greater than 1 (100% capacity):
 - Peppard Road/A4155 Henley Road/Prospect Street (leading to both bridges over the Thames)
 - Gosbrook Road/B3345 (leading to Reading Bridge)
 - St Peters Hill/Church Street/A4155 (leading to Caversham Bridge)
 - Sonning Bridge
- Figure 4.10 (PM Peak Hour) on page 32 shows the St Peters Hill/Church Street/A4155 to have a V/C already greater than 1 (100% capacity).
- Regarding Link/Volume Capacity in Section In 4.6.5 on page 40: “The main areas of congestion are forecast to be (among others), the approaches to Caversham and Reading Bridges from the north”. This consistent with Figures 4.8, 4.10 and 4.12.
- In 5.1.2 Summary on page 47: “This indicates that the Local Plan developments would lead to an increase in traffic at a number of already congested locations across Reading and most significantly:
 - Within the town centre
 - Along the A33/Basingstoke Rd corridor
 - Along the A327 corridor
 - London Rd
 - Reading Bridge junctions
 - Caversham Bridge junctions”
- In 5.2.1 on page 47: “Having identified areas of congestion which are likely to occur as a result of the Local Plan developments, the next step would be to determine the transport improvements necessary to accommodate the developments and to mitigate the congestion forecast to be generated by the developments.” Having stated the obvious, it then fails to provide any meaningful mitigation in this report nor has any other report nor the revised Local Plan done so.
- **It is quite clear from the Council’s own report that the network of roads from the north leading into Caversham and the two bridges are already over capacity and any additional traffic generated by developments such as CA1b will only make it worse yet no mitigation of this problem has been proposed.**

I now move on to the 417-page document “LP006 Statement of Consultation on the Pre-Submission Draft Local Plan, March 2018”, and refer to pages 336 to 364 which are a continuous stream of multiple objections to CA1b. The right-hand column contains a generic response from the Council to all the individual objections and it states: “The Council is aware of concerns around transport infrastructure within the area. Transport Modelling work has been undertaken and does not indicate that this development will have a significant effect on the local road network in terms of pushing road and junctions over capacity.”

Yet, the previously described Transport Modelling Report dated 17th March 2017 clearly states, by any measurement, that this is NOT the case.

How can the Council so blatantly ignore its own earlier report? How can CA1b still be part of the LP when it is clearly unsound? The revised wording does not change this and is therefore unsound.

B4. Please set out the modifications that you think would make the Local Plan, or part of the plan, as changed by the Main Modification(s), legally compliant and/or sound. Please provide specific wording where possible.

Do either of the following two things:

Either:

Remove CA1b from the Local Plan

Or:

Add the following sentence:

“In addition, this development is subject to being able to achieve a substantial improvement in the traffic capacity of the highways networks from the Peppard Road, through Caversham town centre and across the two bridges. This development should not proceed until such an improvement has taken place.”

to the paragraph in CA1b that presently reads:

“Take measures to mitigate impacts on the highways networks, particularly on Kidmore End Road and Tanners Lane.”

Please continue on another sheet if necessary

B5. 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:

BREADMORE, MR AND MRS G

From: [Graham Breadmore](#)
To: [Planning Policy](#)
Subject: Modification to CA1b wording
Date: 22 July 2019 13:49:50

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

Mr & Mrs G. Breadmore, [REDACTED]
[REDACTED]

It is our view that the proposed development at the Reading Golf club is unsound and should not be allowed.

However in reference to the modified CA1b wording:

1. It is disappointing that the requirement for two new holes has been removed particularly since it is believed that Reading Golf Club have only made one attempt to buy new land in South Oxfordshire back in 2015. The removal of the need to replace the land lost through development on CA1b with land for two replacement holes is in contravention of Policy RL6.
2. The requirement for a new clubhouse should also define it as “a permanent structure adjacent to and facing the remainder of the golf club land similar in style and character to the current clubhouse providing at least the same facilities and of a size commensurate with the new golf offering”
3. The future provision of golf on the remaining land should be qualified by “to include a permanent family friendly golf offering on the land within the Reading Borough and a permanent nine-hole golf course on the land within South Oxfordshire, as proposed in the Reading Golf Club/Wates submission to the Inspector”
4. Addition of the word “entire” to the phrase “on the remainder of the entire Golf Club site” would be beneficial.
5. When referring to the new healthcare provision this should be qualified with wording that indicates the size and scale of the provision for example, “for new healthcare facility to house General Practitioners and the necessary associated medical infrastructure.”
6. The onsite provision of open space is also welcomed but size of the area should be clearly defined.
7. Road safety in the vicinity of the CA1b site is of paramount importance and the risk of accidents and injury, particularly to younger children, around Emmer Green Playing Fields and the Children’s Playground on Kidmore End Road, is of serious concern.
8. The paragraph dealing with mitigation of the impact on the highways should give a clear indication of what measures would be acceptable.

9. Reference to the Tree Preservation Order (TPO) should be clear that ALL trees of whatever size or species are protected by the TPO.

10. A legal requirement to maintain permanently all boundaries and the complete security of the whole of the remaining Golf Club land must be required.

11. The parking requirements should be sufficient for the new Healthcare Facility and the new Golf Clubhouse. For example, Emmer Green Surgery currently have 27 parking spaces (acknowledged to be insufficient) and Reading Golf Club have 97 spaces plus overspill on the current site.

12. The number of dwellings originally included in the submission for CA1b was 90-130 dwellings. Now that it is clear that the New Clubhouse and New Healthcare Facility, both with suitably sized car parks, must be within CA1b the number of dwellings should be reduced.

13. Air pollution and traffic assessments for CA1b were carried out in 2015. These assessments are out of date, since when the traffic in Emmer Green and Caversham has increased significantly. Not least following the construction of over 100 new homes in Sonning Common within the last 12 months. The Government Inspector has also recommended that a new paragraph (ref. 8.3.2) is added to improve the soundness of the Draft Local Plan.

The Inspector's wording is as follows and we suggest adding the wording in red italics as below: "Residential development on the part of the Reading Golf Club site identified as CA1b is dependent on ensuring the future use of the remaining land for golf, in line with the need to protect important sports and leisure facilities set out in Policy RL6. Development will need to be careful to ensure that *safe* vehicular access from suitable roads continues to be provided to the remaining golf uses to ensure that they remain operable. A legal agreement will be necessary to ensure that the golf function is retained *permanently*, and development for residential will not take place until a replacement clubhouse, *healthcare* and *adequate car parking* is provided and vehicular access from suitable roads is in place."

Mr & Mrs G. Breadmore.

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BROMMELL, MARTIN

From: [martin.brommell](#)
To: [Burr, Sarah](#); [Planning Policy](#)
Subject: RE: Reading Borough Local Plan – chance to comment on Main Modifications to the Local Plan
Date: 25 June 2019 17:38:35
Attachments: [image001.jpg](#)

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

Dear Sarah,

Over the past 10 years I have commented on the Local Plan in the belief that it was a strategic document setting out Reading Borough Council's direction and intent for Reading for the next 10-15 years. It seems I have been totally misled.

A particular example I have is Mapledurham Playing Field. This was classified in previous documents as protected public green open space and I wrote to one of your colleagues, Jane Greenaway on 25th Sep 2018, to confirm that I fully supported Policy EN7Nn which I was led to believe offered full protection for the whole of the land held in trust at Mapledurham Playing Field.

Nothing could have been further from the truth. If you visit Mapledurham Playing Field today, you will see it is all fenced off as bulldozers move in to churn up the football pitches in preparation for a new landscape plan and the building of a primary school on the site, which is not needed in this part of Caversham. It is a vanity project.

I am utterly disgusted at the roughshod manner in which senior councillors of RBC simply choose to override long established trusts or planning laws to suit their own needs, mainly for financial reasons. What is the point of commenting on a Local Plan if it is not worth the paper it is written on. RBC have failed to protect Arthur Hill swimming bath, failed to protect Kings Meadow swimming bath, failed to replace Reading Central Pool, failed to protect Mapledurham Playing Field which was left in trust in 1938 in perpetuity for the sole purpose of recreation and leisure – not education ! There are many other examples, in fact, too many to quote in this email.

If you wish to feed my comments back into the Local Plan, they are that RBC could stop wasting vast sums of ratepayers money by being honest and by simply declaring what they hell they intend to do. This is because they will do whatever they choose to, regardless of whether it is what the public want, and just continue in the usual corrupt manner they seem to conduct all of their business operations in, where Reading is concerned.

There is no sustainability across Reading. There is less public green open space in Reading than in just about every other borough across the country – even London has more per head of capita than Reading. RBC are ruining the town I was born and grew up in, to the point where it is becoming a concrete jungle full of housing with no infrastructure to support ever growing numbers of residents. Either produce a Local Plan which has teeth and where you actually stick to the policies written in it, or simply save money but cutting out the charades the council plays and just tell the public what you are planning to do next to ruin the next part of the borough!

Martin Brommell

BROOKS, MICHAEL

From: [mike brooks](#)
To: [Planning Policy](#)
Subject: Main modifications to the local plan CA1b
Date: 23 July 2019 18:08:41

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

Dear sir or madam

Thank you for this opportunity to comment. Clearly the removal of the requirement for land to be acquired for two new holes dilutes the intention to ensure the future provision of golf on the remainder of the site. In this context the requirement in 8.3.2, a new paragraph, for a replacement clubhouse before residential development can take place should stress that it must be a permanent structure offering at the very least the same facilities as the current clubhouse.

Whilst the health care provision is welcome, no reference is made to educational facilities in the area.

Earlier this year the Council declared a climate emergency, surely ALL trees are important and must be protected by the TPO.

The provision of a "green link" across the site is to welcomed, but as phrased the sentence is slightly ambiguous. It must be stressed that the existing course is rich in plant species and habitat opportunities and these must be preserved and protected.

As mentioned, the Council has declared a climate emergency, it is odd that I am being invited to comment on a proposed development that will increase traffic and air pollution adjacent to a primary school. My understanding is that the air quality assessment for this project was carried out some 4 years ago and is clearly out of date. A new assessment is surely desirable. Is this residential development really consistent with the Council's intention to be carbon neutral by 2030?

Measure to mitigate the impact on the highway network are essential and it is disappointing that no provisions for cycle paths are mentioned. A precise description of the minimum measures that are acceptable would be welcome.

Michael Brooks

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BROWN, BENJAMIN

From: Benjamin Brown
Sent: 01 July 2019 18:10
To: Planning Policy
Subject: Main Modifications representation: MM10

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

Dear Louise Gibbons,

A representation on MM10 at paragraph 4.2.65. This pertains to the Soundness of the Local Plan.

- Landscape and Visual Impact Assessment (LVIA) is a tool applicable across all landscapes, not simply designated landscapes (i.e. AONBs)
- LVIA pertains to both visual impact and character. It is useful in both urban and rural contexts. Further guidance about LVIA can be found here: <https://www.landscapeinstitute.org/technical-resource/landscape-visual-impact-assessment/>
- The NPPF affords special status to AONBs (para172). This status should be reflected in local plan policy, not in terms of how potential environmental impacts can be assessed (e.g. through an LVIA).
- Policy EN13 in the Reading Local Plan identifies major landscape features in addition to those within the AONBs. It would be appropriate (and useful) to assess the impact of development in these areas using an LVIA. The wording of MM10 indicates that this is not so, which risks the efficacy of Policy EN13.

Therefore the proposed amendment to 4.2.65 (MM10) is not necessary. The paragraph is sound as stands (pre-amendment).

Please keep me informed of all planning policy matters.

Best wishes,

Benjamin Brown

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BYRNE, BRENDAN

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

B1. To which Main Modification does this representation relate?

MM59 - "CH16 PART OF READING GOLF COURSE, KIDMORE END ROAD"

B2. Do you consider that the Local Plan as changed by the Main Modification(s):
(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, as changed by the Main Modification(s), is or is not legally compliant, sound and/or complies with the duty to co-operate.

I believe that the Main Modification above does not meet the test of being legally sound and fulfilling the duty to co-operate for a number of reasons:

- TRAFFIC IN THE AREA IS ALREADY FREQUENTLY JAMMED FOR NUMEROUS REASONS: FLOODING CLOSING THE SONNING CROSSING; DURING THE READING FESTIVAL.
Even in normal circumstances the queuing traffic in the Cavesham area and down Peppard Road in particular results in high pollution caused by vehicular traffic.
A development of the proposed size on top of the substantial development taking place in the Sonning Common area can only result in catastrophically high traffic increases. The only way to mitigate this is by the co-operation of Reading Borough Council with Wokingham and South Oxfordshire District Council.
- There is insufficient provision of primary and secondary education north of the congested Thames crossings, which will not be helped by the proposed new secondary school at Rivermead.

B4. Please set out the modifications that you think would make the Local Plan, or part of the plan, as changed by the Main Modification(s), legally compliant and/or sound. Please provide specific wording where possible.

Considerable efforts have been undertaken to the South Side of Reading to improve infrastructure - this would be a better location in which to develop, given the much better transport links and access to the M4 Motorway in particular.

Given the constraints imposed on traffic by the already overstretched bridges at Henley, Sanding, Reading and Caversham, a clause should therefore be inserted in section MM 59 to state that any development on the Reading Golf Club should only take place once an additional Thames crossing has been put into operation, in order to mitigate the detrimental impact on local traffic.

A clause should also be inserted requiring there to be additional primary and secondary school places funded, with the required infrastructure (extra classrooms etc) funded by the developers before construction starts.

Please continue on another sheet if necessary

B5. 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:

CALDER, COLIN

From: [Colin Calder](#)
To: [Planning Policy](#)
Subject: Reading Borough Council Draft Local Plan - Reference CA1b.
Date: 19 July 2019 18:52:39

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

I will begin my comments and suggestions on the latest version of Reading Borough Council's Draft Local Plan with an acknowledgement of the entirely sensible and practical conditions that now require completion prior to the building of domestic properties on the CA1b site. Whilst I still believe that any building on any of the Golf Club land to be a bad decision, the current Draft is a great improvement on the original.

The wording will be further improved by the following additions and/or amendments:

a) The new Golf Club Clubhouse must be a permanent and substantial structure. The possibility of a temporary "hut" has to be totally ruled out. The new Clubhouse must also be easily accessible, have adequate parking and be positioned in such a way as enhances and supports the Course, Golf Club Members and all of the facilities. A Golf Course, with 18 holes, which can be redesigned even with the loss of the CA1b space.

b) The Healthcare building requirement needs more detailed specification of what services will be available there - qualified doctors, general medical and support staff and should be described as a fully functioning GP Practice. As is well known locally the current Emmer Green Surgery is "closed" to new patients. The Healthcare facility must also have adequate patient and staff parking.

c) The sentences dealing with the impact of CA1b on the roads - main roads and the many very narrow side roads - should make clear much more precisely what improvements and general standards are required. The irony is that some domestic residences might have to be demolished to sufficiently widen some of the current side roads! And I note that in a recent Reading Golf Club communication the responsibility for access will be "passed" to Reading Borough Council.

d) There needs to be much better definition and more precise requirements on the very welcome Open Space requirement. It seems to me to be open to all manner of interpretation and therefore exploitable by developers.

Turning to Paragraph numbered 8.3.2, I suggest it will benefit from the addition of some precise definition. Specifically in CAPITALS:

"---- to ensure that SAFE vehicular access ----".

"---- the golf function is retained PERMANENTLY and development ----".

"---- replacement clubhouse , HEALTHCARE BUILDING AND ADEQUATE CAR PARKING is provided ----".

There are a number of areas where I believe further improvement is possible but I see the above as key. We have seen many examples of planning given the go ahead and when the domestic properties are built the support functions identified in the original plan are then "forgotten" - the area known as "Bugs Bottom" in Emmer Green comes readily to mind. I trust that Reading Borough Council will not allow that to happen with the CA1b proposal.

Kind regards,

Colin Calder.

CAPSTICK, DAVID

Burr, Sarah

From: David Capstick
Sent: 23 June 2019 16:22
To: Planning Policy
Subject: Reading Borough Council Main Modifications to the Local Plan June 2019

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

Dear Sir/Madam

Following the publication of the above Plan please see my comments below.

Comments and Main Change Recommendations

Referring to the modified CA1b wording:

1. It is disappointing that the requirement for two new holes has been removed particularly since it is believed that Reading Golf Club have only made one attempt to buy new land in South Oxfordshire back in 2015. The removal of the need to replace the land lost through development on CA1b with land for two replacement holes is in contravention of Policy RL6.
2. The requirement for a new clubhouse should also define it as “a permanent structure adjacent to and facing the remainder of the golf club land similar in style and character to the current clubhouse providing at least the same facilities and of a size commensurate with the new golf offering”
3. The future provision of golf on the remaining land should be qualified by “to include a permanent family friendly golf offering on the land within the Reading Borough and a permanent nine-hole golf course on the land within South Oxfordshire, as proposed in the Reading Golf Club/Wates submission to the Inspector”
4. Addition of the word “entire” to the phrase “on the remainder of the *entire* Golf Club site” would be beneficial.
5. When referring to the new healthcare provision this should be qualified with wording that indicates the size and scale of the provision for example, “for new healthcare facility to house General Practitioners and the necessary associated medical infrastructure.”
6. The onsite provision of open space is also welcomed but size of the area should be clearly defined.
7. Road safety in the vicinity of the CA1b site is of paramount importance and the risk of accidents and injury, particularly to younger children, around Emmer Green Playing Fields and the Childrens Playground on Kidmore End Road, is of serious concern.
8. The paragraph dealing with mitigation of the impact on the highways should give a clear indication of what measures would be acceptable.
9. Reference to the Tree Preservation Order (TPO) should be clear that ALL trees of whatever size or species are protected by the TPO. **(I note a photograph of a tree which had been removed and which I sent through to the Council has still not been replaced even through the Golf Club assured the Council it would be; perhaps you are already looking in to this?)**
10. A legal requirement to maintain permanently all boundaries and the complete security of the whole of the remaining Golf Club land must be required.
11. The parking requirements should be sufficient for the new Healthcare Facility and the new Golf Clubhouse. For example, Emmer Green Surgery currently have 27 parking spaces (acknowledged to be insufficient) and Reading Golf Club have 97 spaces plus overspill on the current site.
12. The number of dwellings originally included in the submission for CA1b was 90-130 dwellings. Now that it is clear that the New Clubhouse and New Healthcare Facility, both with suitably sized car parks, must be within CA1b the number of dwellings should be reduced.
13. Air pollution and traffic assessments for CA1b were carried out in 2015. These assessments are out of date, since when the traffic in Emmer Green and Caversham has increased significantly. Not least following the construction of over 100 new homes in Sonning Common within the last 12 months.

The Government Inspector has also recommended that a new paragraph (ref. 8.3.2) is added to improve the soundness of the Draft Local Plan.

The Inspector's wording is as follows and we suggest adding the wording in red italics as below:

“Residential development on the part of the Reading Golf Club site identified as CA1b is dependent on ensuring the future use of the remaining land for golf, in line with the need to protect important sports and leisure facilities set out in Policy RL6. Development will need to be careful to ensure that *safe* vehicular access from suitable roads continues to be provided to the remaining golf uses to ensure that they remain operable. A legal agreement will be necessary to ensure that the golf function is retained *permanently*, and development for residential will not take place until a replacement clubhouse, *healthcare and adequate car parking* is provided and vehicular access from suitable roads is in place.”

Thanks

David Capstick

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CARTER, MR AND MRS

From: [Beryl](#)
To: [Planning Policy](#)
Subject: CA1b MM59Reading Golf Club Kidmore End Rd RG4
Date: 22 July 2019 15:40:02

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

Dear Planning Office,

We wish to express these concerns and recommendations/wording in the following areas:

1. The removal of the requirement for 2 new holes on the ground is not acceptable without sufficient evidence the owners of the club have attempted to secure any land. Not making provision for replacement land to support the 2 holes contravenes policy RL6
2. The requirement to provide a Clubhouse as a permanent structure with sporting facilities equivalent to those in place and also for the use of the community.
3. Provision of golf on the remaining land should be a permanent one (family inclusive) and on the land within Berks/South Oxfordshire as was proposed by Reading Golf Club in the Wates submission to the inspector
4. The "ENTIRE" remainder of the Golf Club site" should be for the sole use as a sporting/green facility.
5. Any Healthcare provision must be qualified with clear indication of size; scale and provision and also confirmation that it will house General Practitioners and the associated infrastructure will support and sustain, the increased population that comes with this housing developments.
6. Green space returned to the community MUST be clearly defined. Caversham Park Village's open space was 'acquired' by residents and builders over time and green spaces were fenced off and built on.
7. Safe passages/pedestrian access and road safety around CA1b should be in place to prevent serious accidents: this is an area that is adjacent to playing fields; a playground and is also the cycling/walking route for many children to schools.
8. Mitigation of the impact on the highways: heavy work vehicles and increased traffic should be taken into account.
9. There is NO public footpath/pavement on the roads leading from Tanners Lane; Kidmore End in the direction of Emmer Green. Strategies to minimise impact on roads; verges; trees; hedges must be detailed.
10. TPO's should include ALL trees including the ancient woodland and parkland.
11. To prevent trespassers/damage, all boundaries must be secured.

12. Parking spaces be sufficient for the Healthcare facility and spaces should include disabled access.
13. As parking would be required for both Clubhouse and Healthcare facility is sited within CA1b, the original submission for 90-130 dwellings should be reduced to provide this- Kidmore end rd does not have provision for off road parking as it already functions on a single lane from the park to the junction.
14. Air pollution and traffic assessments for CA1b carried out in 2015 are now out of date. Major causes of air pollution are caused by the impact of rubber from tyres on the poor surface of roads- the roads around this proposed site will not only be subjected to an increase in traffic put under excessive and intensive use but also the increase in heavy lorries (many diesel and many with dangerous emissions).

WE note that the Government Inspector has recommended that a new paragraph (ref. 8.3.2) is added to improve the soundness of the Draft Local Plan.

We believe that the wording in red italics reduces the possibility of ambiguity:

“Residential development on the part of the Reading Golf Club site identified as CA1b is dependent on ensuring the future use of the remaining land for golf, in line with the need to protect important sports and leisure facilities set out in Policy RL6. Development will need to be careful to ensure that *safe* vehicular access from suitable roads continues to be provided to the remaining golf uses to ensure that they remain operable. A legal agreement will be necessary to ensure that the golf function is retained *permanently*, and development for residential will not take place until a replacement clubhouse, *healthcare and adequate car parking* is provided and vehicular access from suitable roads is in place.”

Updated BBC news: July 2019 World forest are under increased threat (far worse than reported at the time of the initial consultation). The land at RGC is ESSENTIAL to support the absorption of poisonous carbon pollutants.

It is not too late to promote existing Brownfield sites and protect the GREEN sites as a matter of public health and conservation.

Sincerely,

Mr & Mrs Carter

CAVERSHAM AND DISTRICT RESIDENTS' ASSOCIATION

Comments from the Caversham and District Residents Association (CADRA) on the main modifications to the Reading Borough Council Local Plan - July 2019

B1 Main Modification	B2 Whether Sound	B3 Comment	B4 Suggested Revision
MM6	Yes	CADRA welcomes the modification	
MM7	Yes	CADRA welcomes the modification	
MM15	No	<p>The Local Plan succeeds in accommodating almost all of its substantial housing requirement within a tight geographical boundary. However, that combination impels a big increase in the number of apartments and, particularly, in the height of residential development. This is already having a dramatic and unwelcome effect on the townscape of central Reading, which is being changed beyond recognition. Reading is being severely stretched to accommodate its own predicted housing needs.</p> <p>The reasons for that are understood. So too is the wish avoid the situation where beneficial windfall employment growth, beyond the plan's allocations, would have to be rejected because of insufficient housing and the consequent inflation of this market. We assume that is the logic behind this policy, but suggest it is misplaced in its revised form.</p> <p>As drafted, it means that additional employment development could provide a pretext for additional housing beyond current allocations. It provides a loophole for developers to coordinate applications for offices and housing, enabling them to exceed the Plan's targets for both. In our view, the town's capacity to absorb more of either is badly enough stretched by existing allocations, without such a potentially open-ended increase beyond them.</p> <p>With a very high proportion of potential sites within Reading already identified and allocated, such pressure would place renewed pressure for development on the town's fringes which hitherto, for good reasons, has been successfully resisted.</p>	<p>CADRA suggests that the risk of windfall employment inflating the housing market could be overcome by reinstating the previous references to affordable housing, which would have the opposite effect, and by omitting references to the provision of new housing.</p> <p>MM15 would then read:</p> <p>"...will need to either (a) demonstrate that it will not result in additional need for local housing; or (b) mitigate its impacts on the need for local housing through contributions to affordable housing".</p>
MM32	Yes	CADRA welcomes the modification	
MM34	Yes	CADRA welcomes the modification	
MM44	No	The requirement that any replacement for the Hexagon should be in the same area is damagingly restrictive. The possibility of a new theatre could be	Remove the first proposed amendment and revert to the original. Delete 'which is expected

Comments from the Caversham and District Residents Association (CADRA) on the main modifications to the Reading Borough Council Local Plan - July 2019

		<p>decisive in building the critical mass needed for a new cultural quarter centred on a regenerated Reading Gaol.</p> <p>The policy as amended unnecessarily restricts this possibility. Removing the amendment, to make the policy non-site specific, would not preclude either location.</p>	to be in the same area' from the second amendment.
MM45	No	<p>CADRA urges revisions to make this policy proactively supportive of the re-use of the Gaol as the core of a new cultural quarter for Reading. For a town of its size and prosperity, Reading lacks many of the cultural facilities one might expect: for example, a high-quality dedicated gallery, a producing theatre, and easy-terms accommodation for creative businesses. Smaller and less prosperous places out-perform it markedly in these respects, and restoration of the Gaol for these purposes would be a double win, through not only their provision but also the exciting restoration of this important historic building for purposes of wide community benefit.</p> <p>CADRA appreciates the huge financial and other problems in achieving this, so suggests that this aspiration be expressed as a strong first preference for the site. The other uses mentioned in the policy should be cast very much as fall-backs, only applicable should there be conclusive evidence that this aspiration cannot be delivered.</p> <p>The bland current reference to including 'some cultural or heritage element' within a scheme devoted primarily to other uses is a wholly inadequate response to this great potential.</p>	
MM59	Yes	CADRA welcomes this revision. The issues of extensive development north of the Thames have been extensively considered.	
MM62	Yes	CADRA broadly welcomes a policy which should enable a new use for this important building while retaining its important historic features. Our only concern is that important internal features should be protected as well as its external appearance, and we suggest a slight amendment below to reinforce this point.	"... if it sustains the significance of the listed building, including any important internal features and the building's major internal spaces."

CHANDLER, DANIEL

From: Dan
Sent: 16 July 2019 11:58
To: Planning Policy
Subject: Reading Local Plan, Policy CA1b

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

Dear Sirs,

Regarding the the new consultation on Part of Reading Golf Club, CA1b, Main Modification MM59 in the new consultation document "READING BOROUGH LOCAL PLAN CONSULTATION ON MAIN MODIFICATIONS JUNE 2019", please see below for comments and suggested improvements and enhancements to the wording to ensure that CA1b is explicit and unambiguous, leaving no room for misunderstanding:

Comments and Main Change Recommendations

Referring to the modified CA1b wording:

1. It is disappointing that the requirement for two new holes has been removed particularly since it is believed that Reading Golf Club have only made one attempt to buy new land in South Oxfordshire back in 2015. The removal of the need to replace the land lost through development on CA1b with land for two replacement holes is in contravention of Policy RL6.
2. The requirement for a new clubhouse should also define it as "a permanent structure adjacent to and facing the remainder of the golf club land similar in style and character to the current clubhouse providing at least the same facilities and of a size commensurate with the new golf offering"
3. The future provision of golf on the remaining land should be qualified by "to include a permanent family friendly golf offering on the land within the Reading Borough and a permanent nine-hole golf course on the land within South Oxfordshire, as proposed in the Reading Golf Club/Wates submission to the Inspector"
4. Addition of the word "entire" to the phrase "on the remainder of the *entire* Golf Club site" would be beneficial.
5. When referring to the new healthcare provision this should be qualified with wording that indicates the size and scale of the provision for example, "for new healthcare facility to house General Practitioners and the necessary associated medical infrastructure."
6. The onsite provision of open space is also welcomed but size of the area should be clearly defined.
7. Road safety in the vicinity of the CA1b site is of paramount importance and the risk of accidents and injury, particularly to younger children, around Emmer Green Playing Fields and the Childrens Playground on Kidmore End Road, is of serious concern.
8. The paragraph dealing with mitigation of the impact on the highways should give a clear indication of what measures would be acceptable.
9. Reference to the Tree Preservation Order (TPO) should be clear that ALL trees of whatever size or species are protected by the TPO.
10. A legal requirement to maintain permanently all boundaries and the complete security of the whole of the remaining Golf Club land must be required.
11. The parking requirements should be sufficient for the new Healthcare Facility and the new Golf Clubhouse. For example, Emmer Green Surgery currently have 27 parking spaces (acknowledged to be insufficient) and Reading Golf Club have 97 spaces plus overspill on the current site.
12. The number of dwellings originally included in the submission for CA1b was 90-130 dwellings. Now that it is clear that the New Clubhouse and New Healthcare Facility, both with suitably sized car parks, must be within CA1b the number of dwellings should be reduced.
13. Air pollution and traffic assessments for CA1b were carried out in 2015. These assessments are out of date, since when the traffic in Emmer Green and Caversham has increased significantly. Not least following the construction of over 100 new homes in Sonning Common within the last 12 months.

The Government Inspector has also recommended that a new paragraph (ref. 8.3.2) is added to improve the soundness of the Draft Local Plan.

The Inspector's wording is as follows and I suggest adding the wording in red italics as below:

"Residential development on the part of the Reading Golf Club site identified as CA1b is dependent on ensuring the future use of the remaining land for golf, in line with the need to protect important sports and leisure facilities set out in Policy RL6. Development will need to be careful to ensure that *safe* vehicular access from suitable roads continues to be provided to the remaining golf uses to ensure that they remain operable. A legal agreement will be necessary to ensure that the golf function is retained *permanently*, and development for residential will not take place until a replacement clubhouse, *healthcare and adequate car parking* is provided and vehicular access from suitable roads is in place.

Kind regards,

Daniel Chandler

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COOPER, MR AND MRS

From: [Andrew Cooper](#)
To: [Planning Policy](#)
Subject: Reading Borough Local Plan Consultation on Main Modifications June 2019
Date: 23 July 2019 23:24:23

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

Dear Sir/Madam,

CA1b PART OF READING GOLF COURSE, KIDMORE END ROAD

With regard to the suggested wording, '*subject to the future provision of golf on the remainder of the Golf Club site, which fulfils an important sports and leisure function for Reading, being secured*', it is suggested that the nature and scale of this future golf provision should be specified in the wording. Also, it is suggested that wording is added to note that the Golf Club site also fulfils an important function protecting the landscaping, trees, wildlife and countryside.

The suggested wording notes, '*On-site facilities should be provided to mitigate impacts on community infrastructure, including for healthcare*'. It is suggested that the wording should be altered to, '*will be provided*', given that Emmer Green Surgery is stretched to the limits. Also, consideration should be given to other community infrastructure, and the type of facilities to be provided by a future developer ought to be specified in the wording.

'The development will need to ensure that vehicular access is provided from suitable roads to the area to be retained for golf... take measures to mitigate impacts on the highway network, particularly on Kidmore End Road and Tanners Lane'. The means of access may well form part of an outline planning application, though it ought to be provided now. Certainly, the definition of a suitable road for access to future development needs to be provided. Kidmore End Road become a rural lane on leaving the sub-urban area. It is de-restricted, unlit, steep, bendy, does not provide proper two-way access, and does not have any footways. Tanners Lane is a narrow country lane, and it is not possible for two vehicles to pass. It is even extremely limited for a vehicle to pass a pedestrian. It is difficult to see how these roads would provide suitable access and the proposed measures to mitigate impacts on the highway network should be detailed now. Also, whilst the golf club may well have control over land adjacent to these ancient highways, works to improve these lanes would likely impact on trees, hedgerows and ditches etc. It is suggested that wording is added to require the development to ensure that acceptable non-car access to future development is provided.

Suggested wording is proposed which notes, '*include all parking requirements within the site to avoid exacerbating parking issues on existing streets*'. It should be noted that the on-site parking provision needs to comply with the Council's adopted parking standards, and take account of car ownership within this part of Reading. The design and layout of a future residential development may well form part of a reserved matters application, though it is expected that parking would be suitably-designed to be user-friendly for residents and their visitors. Adequate parking should be provided for community facilities, including healthcare; and of course suitable parking is required for the golf offering.

The suggested proposed new paragraph and renumber subsequent paragraphs notes, "*8.3.2 Residential development on the part of the Reading Golf Club site identified as CA1b is dependent on ensuring the future use of the remaining land for golf, in line with the need to protect important sports and leisure facilities set out in Policy RL6. Development will need to be careful to ensure that vehicular access from suitable roads continues to be provided to the remaining golf uses to ensure that they remain operable. A legal agreement will be necessary to ensure that the golf function is retained, and development for residential will not take place until a replacement clubhouse is provided and vehicular access from suitable roads is in place.*" It is suggested that the wording requires details of the said legal agreement (presumably a s106 agreement) to be provided, if indeed the golf function can be secured via legal agreement. This is considered necessary to clarify and confirm the future of the site, including the golf provision.

We trust these suggestions are of help.

Yours sincerely

Mr and Mrs Cooper

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CUSHLEY, JIM

From:
Sent: 24 July 2019 13:10
To: Planning Policy
Subject: Reading Borough Local Plan – comments on Main Modifications to the Local Plan

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

As a local resident, I fully support the clauses to:

'mitigate impacts on the highway network, particularly on Kidmore End Road and Tanners Lane'

and

'Include all parking requirements within the site to avoid exacerbating parking issues on existing streets...'

Currently, part of Kidmore End Road (by the terrace houses, opposite the park) operates as a single lane or single-flow road, because you have a row of parked cars outside the terrace houses opposite the park, and you have to give way to oncoming traffic (including buses). It is all done in an informal, usually friendly way, and it works because it is only about 100 yards long, and you can clearly see both ends of the parked cars. With the new development, and increased traffic, it will make it more difficult to get past this section of road.

The other issue is that residents/visitors of the new development, particularly if parking spaces in the new development are restricted, will use Kidmore End Road and surrounding roads as alternative, overspill parking options, and that could be more dangerous as children walk and cycle to the park, childrens' play area, and to Emmer Green and Highdown schools. In about a 200 yard stretch outside the golf club, there are 5 roads (excluding the entrance to the golf club) coming onto on Kidmore End Road - St Benets Way, Lyfield Court, Chalgrove Way, Twin Oaks, and Brooklyn Drive - plus 2 bus stops. If cars from the new development start parking on Kidmore End Road, and surrounding roads, this could be dangerous for children, pedestrians, and cyclists, and so I welcome these extra clauses. Would double yellow lines on Kidmore End Road help?

I support the change that is more specific about on-site facilities *'including for healthcare'*. There is huge pressure on GP practices in Caversham and Emmer Green, with Priory Avenue closing a few months ago, and Peppard Road Surgery closing last month, and that just leaves Balmore Park Surgery and Emmer Green Surgery. I think both practices are restricted in working space, and car parking facilities, and it is difficult for them to expand on their current sites, and the recent closures of other surgeries just adds to the pressure. Then we add CA1b with up to 130 dwellings, and possibly 260-300 people.

I support the clauses referring to the future use of the golf club land outside of CA1b:

'subject to the future provision of golf on the remainder of the Golf Club site, which fulfils an important sports and leisure function for Reading, being secured.'

and

'Residential developmentis dependent on ensuring the future use of the remaining land for golf, in line with the need to protect important sports and leisure facilities set out in Policy RL6.'

and

'A legal agreement will be necessary to ensure that the golf function is retained'

I cannot reconcile RGC proposing golf facilities on the remaining golf club land outside of CA1b, with their statements to members saying that they wish to develop the whole of the golf club land for housing, and submitting land to SODC for housing development - so I support the proposal that some type of legal agreement, to retain the land as a golfing facility, is necessary - otherwise I fear the golfing facilities will be a stop-gap measure until further planning applications for housing development are made.

I am sending you a separate email on Air Quality. I am sending it as a separate email, as I'm not sure if you will accept comments on Air Quality, as I don't think it was referred to in the modifications to the Local Plan. My concern is that Air Quality is an issue that most people, including myself, have not been aware of until very recently, after the Local Plan consultation, and now we are realising the tragic consequences of NO2 and PM pollution from diesel car exhaust fumes. I understand if you wish to ignore my comments at this stage, but I would like to ask that Air Quality be discussed at some later stage in the planning process.

Thank you

Jim Cushley

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

From:
Sent: 24 July 2019 13:18
To: Planning Policy
Subject: Reading Borough Local Plan – Air Quality
Attachments: The silent killer on Caversham's busy roads - 2018.pdf

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

Air Quality is a serious and relevant topic, and a lot of new information about this issue has come out in the media in the last 6 months and raised public awareness. - so in earlier stages of the Local Plan process, people were not aware that outdoor air pollution can be attributable to 40,000 deaths per year, nor that it actually applied to us in Caversham and Emmer Green (see attached article 'The silent killer on Caversham's busy roads - 2018').

I think the new development, CA1b, will have a significant negative impact on air quality, and so endanger lives, particularly so in Caversham, which is part of the Reading Borough Council AQMA (Air Quality Management Area). CA1b is a development of up to 130 dwellings. I estimate that could be 200 cars. Most people will drive to work, and most people will drive out of the development and turn right along Kidmore End Road, and then turn right on the Peppard Road and head for Caversham and the 2 bridges crossing the River Thames - there is little option if you want to shop or work in central Reading, want to catch the train, work in Thames Valley Business Park, Green Park, Theale, Bracknell, want to get on the M4 west to Newbury, east to Heathrow and London, south to Basingstoke and so on. This will increase traffic congestion in central Caversham, and increase the poor air quality - I am referring to NO₂ and PM emissions from diesel cars and vans. These toxic fumes, from congested, often stationary traffic, are being emitted just-outside Caversham Library, Costa Coffee, where people are sat outside, the entrance to Waitrose, Boots etc, where adults and children are very close to the road. Are people dying from these fumes? Am I over-reacting?

I know Reading Borough Council are doing their best to address this issue by promoting alternative forms of transport, electric car charging points, by investing in active travel such as walking and cycling, but does it make sense to add more cars from this new development to the mix.

I'm not sure if my comments are relevant at this stage of the Local Plan process, or if they are for a later stage of the planning process, but I leave that for you to decide. I have sent some other comments on the modifications proposed to you in an earlier email.

Thank you for reading through my comments.

I have attached the Caversham Globe article 'The silent killer on Caversham's busy roads - 2018'

Jim Cushley

The silent killer on Caversham's busy roads - 2018

The harm to human health and our environment of "Poor Air Quality" has been the subject of international, UK and local media discussion for some years. The alarming measurements taken by Caversham GLOBE (**Go Local On a Better Environment**) group, as part of a national campaign organised by Friends of the Earth (FoE), reveal the dangerous levels of nitrogen dioxide (NO₂) in central Caversham. Special test tubes were obtained and installed to measure the amount of harmful and dangerous nitrogen dioxide (micro-grams per cubic metre) on some local roads and the results were analysed by Gradko Laboratories of Winchester. These **results, in µg/m³ (micrograms per cubic metre) are as follows:**

Caversham Location	Dec 2017	March 2018	July 2018	Sept 2018
Church Street/Prospect Street jnc	Not tested	41 µg/m ³	41 µg/m ³	34 µg/m ³
Near Church St/Priory Ave jnc	Not tested	47 µg/m ³	49 µg/m ³	40.5 µg/m ³
Church Road/St Anne's Road jnc	56 µg/m ³	57 µg/m ³	50 µg/m ³	41.5 µg/m ³
Peppard Rd near Prospect St jnc	Not tested	54 µg/m ³	71 µg/m ³	48.5 µg/m ³

This means we're breathing in dangerous particles! The **legal MEAN ANNUAL limit for nitrogen dioxide is 40µg/m³**. These alarming results show just how bad pollution is on our roads and how dangerous they are for residents, pedestrians and cyclists.

Of more concern is the equivalent information that RBC has collected for air quality measurement – see below – showing that **THREE CAVERSHAM LOCATIONS HAVE EXCEEDED THE MEAN ANNUAL LEGAL LIMIT FOR THE PAST NINE YEARS!**

131 Caversham Road	471261	174236	Yes	BORDERLINE	45	41	49	43	43	47	40	36	36
14 Church Road	471103	174774	Yes	BORDERLINE	41	38	38	41	41	42	35	37	36
Baron Cadogan PH	471461	174840	Yes	EXCEEDING AQO	60	49	50	52	51	50	44	46	44
45 Prospect Street	471558	174919	Yes	BORDERLINE	45	40	42	45	45	44	39	38	37
59 Prospect Street	471599	174966	Yes	EXCEEDING AQO	58	50	50	50	49	58	49	48	45
60 Prospect Street	471557	174944	Yes	BELOW AQO	41	40	35	38	40	38	35	34	33
212 Gosbrook Road	471904	174635	No	BELOW AQO	38	31	37	43	34	40	-	-	
241 Gosbrook Road	471942	174600	Yes	BELOW AQO	33	34	38	43	38	40	35	35	34
2 Kings Road	471928	174548	No	BELOW AQO	37	32	33	35	33	39	-	-	
68 George Street	471913	174490	Yes	BELOW AQO	36	36	33	37	36	38	34	33	31
40 George Street	471909	174543	Yes	EXCEEDING AQO	52	46	48	50	44	52	42	44	47
					2009	2010	2011	2012	2013	2014	2015	2016	2017

What is to be done? Who will do it? When? These crucial questions and many more need some answers. This matter has now been raised with the RBC Strategic Environment and Transport Committee. However, the agenda papers of 21 November 2018 on Air Quality (search for 7 page RBC document at <http://www.reading.gov.uk/article/11415/Archived-meetings-from-01-September-to-31-December-2018>) does not make any reference to AQ readings north of the

Thames, even though Prospect Street readings have been above the illegal limit for many years and GLOBE's AQ readings are not mentioned. Residents groups and RBC Councillors in north Reading need to develop a joint approach for remedial action underpinned with funding and commitment from RBC This could include more trees, street planters and green walls. However, only by reducing the levels of polluting traffic exhaust fumes will residents, pedestrians and cyclists be able to breathe cleaner air in the long term.

Readers should also note that the infamous Cow Lane Bridges project will be completed in Spring 2019. This will result in increased eastbound vehicle traffic coming to Caversham Bridge junction with Richfield Avenue as well as more traffic coming from the north and east seeking a westbound route across town. Reading Borough Council proposes to restrict traffic in west Reading, on the Oxford Road, so that Portman Road, Richfield Avenue and Caversham Road will be an alternative route. High density of residential apartment blocks planned for Caversham Road, Vastern Road and nearby locations will also bring heavier vehicle traffic. Anyone can reasonably predict longer traffic queues, slower journey times and increased air pollution. Action is overdue. Meantime, best advice might be "hold your breath"?

Contacts:

www.cavershamglobe.org.uk

<https://www.facebook.com/cavershamglobe/>

February 2019 ref: GLOBE/Air Quality.

DYER, THOMAS

Reading Borough Council
 Main Modifications to the Local Plan
 June 2019
 Representations Form



Please return by Wednesday 24th July 2019 to: Planning Policy, Civic Offices,
 Bridge Street, Reading, RG1 2LU or email planningpolicy@reading.gov.uk

PART A - YOUR DETAILS

Personal Details

Agent's Details *(if applicable)*

Title	MR	
First Name	THOMAS	
Last Name	DYER	
Job Title <i>(if applicable)</i>		
Organisation <i>(if applicable)</i>		
Address 1	[REDACTED]	
Address 2	[REDACTED]	
Address 3		
Town	[REDACTED]	
Post Code	[REDACTED]	
Telephone	[REDACTED]	
E-mail	[REDACTED]	

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

B1. To which Main Modification does this representation relate?

C A 1 b

B2. Do you consider that the Local Plan as changed by the Main Modification(s):
(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, as changed by the Main Modification(s), is or is not legally compliant, sound and/or complies with the duty to co-operate.

AS ATTACHED

Please continue on another sheet if necessary

READING BOROUGH LOCAL PLAN CONSULTATION ON MAIN MODIFICATION JUNE 2019

CA1b – Reading Golf course

B3

I believe the Government Inspectors Report and subsequent Revised Local Plan at CA1b seems reasonable pending some minor wording alterations to avoid ambiguity.

With Fairfax & Reading Golf Club having entered into a long term option agreement for the sale it would be entirely likely that further pre-applications will be forwarded over various tranches of land within the Berkshire Borough...of course with a larger allocation for social housing and health centre facilities in a desperate search of a favourable outcome. Of course, our current infrastructure simply cannot cope with anything so vast and the Inspector report appears conclusive.

The Government Inspectors Report and subsequent Revised Local Plan appear to be decisive and any attempt by Fairfax & Reading Golf Club for further planning beyond CA1b will be further desperation as it appears Reading Golf Club have jumped the gun and recklessly entered into a long term lease agreement with Caversham Heath, committing the memberships shareholding to the project prior to the result of the Government Inspectors Report. They now find themselves having to manage two clubs even though they were strongly advised by many members not to enter into any agreement prematurely.

The carrot of big sums of money to each shareholder to encourage the membership to vote to relocate were dangled by the committee but given the latest Revised Local Plan with the stipulation that golf should be retained in Emmer Green and the restriction of housing development solely at CA1b, this money is unlikely to be forthcoming. You would therefore, assume that members as a result will be much happier to remain in Emmer Green and venture forward with a new sustainable clubhouse and revised golf course layout to incorporate the development at CA1b.

Tom Dyer



B4. Please set out the modifications that you think would make the Local Plan, or part of the plan, as changed by the Main Modification(s), legally compliant and/or sound. Please provide specific wording where possible.

AS ATTACHED

Please continue on another sheet if necessary

B5. 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:

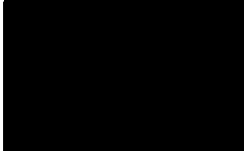
READING BOROUGH LOCAL PLAN CONSULTATION ON MAIN MODIFICATION JUNE 2019

CA1b – Reading Golf course

B4

1. I think it is important that the new clubhouse requirement specifically states a size to at least **'match the square footage of the existing structure.'** Plus ensure long term sustainability within the structure to incorporate modern day facilities including a Gym, Restaurant and Coffee Shop to embrace the commercial catchment of Emmer Green.
2. Whilst it is surprising that the requirement for two extra holes has been removed it should be stated that to retain a full 18 hole golf course, this should be fulfilled by attaining adjacent land or **to create 2 extra holes in the remaining footprint.**
3. A provision for the size of the Health Centre should be stated bearing in mind 100+ new homes are being proposed and the current over subscription of local doctor's surgeries at this time.
4. The parking requirement should be made clearer in terms of my points 1 & 3 to ensure there is a provision for overflow to avoid the typical clogging up of nearby streets.

Tom Dyer



ENVIRONMENT AGENCY

Ms Sarah Burr
Reading Borough Council
Planning Manager
Civic Centre
Castle Street
Reading
Berkshire
RG1 7AE

Our ref: WA/2006/000005/CS-
09/EW1-L01
Your ref:
Date: 24 July 2019

Dear Ms Burr

Reading Borough Local Plan – Main Modifications to the Local Plan

Thank you for your consultation on the above local plan consultation. Some of the following comments have also been written in our representation forms which we have forwarded to you in another email. Please note that I have also made comments on the sequential test in this letter, which we made a soundness representation on in January 2018. However this has not been covered in the main modifications document.

MM14 - Functional floodplain definition in SFRA

The Strategic Flood Risk Assessment (SFRA) is unsound as it is not consistent with national planning policy and it is also not justified.

I refer to the main modification paragraph MM14. In paragraph 4.2.100 you have stated:

“4.2.100 The SFRA also defines the extent of the functional floodplain within Reading. The 2017 SFRA, in describing how this has been approached, distinguishes between Flood Zone 3b ‘Functional Floodplain’ and Flood Zone 3b ‘Developed’. For clarity, the final definition on the flood zone maps F4 in the SFRA incorporates both of these categories, and it is this combined area which should be considered as Flood Zone 3b for the purposes of applying policy.”

We are pleased that you have tried to address the definition of ‘developed land.’ However it’s still not clear to us that this ensures that the SFRA does not promote more vulnerable and highly vulnerable in Flood Zone 3b (Functional floodplain).

In our representation form for the Regulation 19 local plan submission we also raised the point about the definition of ‘previously developed land’ and the potential misinterpretation of this definition. Our concern was that developers may take this to mean that any new development on land that is in functional floodplain will be appropriate as long as there is already a structure on the land regardless of what the

Cont/d..

structure is.

Please confirm in the above paragraph you are now saying that any developed land as well as undeveloped land will be considered to be Flood Zone 3b. Therefore any proposed more or highly vulnerable development would not be permitted in accordance with Table 3 'Flood risk vulnerability and flood zone 'compatibility' of the Planning Practice Guidance? This needs to be clear for developers and applicants so they understand what to expect when proposing development.

In order to help you with this wording, we have the following suggested wording which we would provide clarity to see in the local plan supporting text for policy EN18: Flooding and Sustainable Drainage Systems and the SFRA:

“Development proposals in the ‘developed’ flood zone 3b will only be approved where the footprint of the proposed building(s) is not greater than that of the existing building(s). There must be no increase in development vulnerability or intensification in use and developers should proactively seek a reduction in risk.”

For the purposes of clarity you should also delete paragraphs 10.1.7 -10.1.9 from the Level 1 SFRA to avoid contradicting paragraph 4.2.100.

MM41 - Site allocations CR 11g and CR11i

The site allocations CR 11g and CR11i are unsound as they are not consistent with national planning policy, justified or effective.

Regarding paragraph 5.4.12 we are pleased that you have acknowledged that an assessment of the 35% and 70% allowances for climate change needs to be addressed if these sites include an area of Flood Zone 3. However this needs to be assessed in the SFRA level 2 evidence base now so you can determine whether site allocations CR11g and CR11i are going to deliverable.

If the 35% or 70% allowances for climate change show that flood extents are increased then your site may not be deliverable. Please refer to our representation forms from the Regulation 19 response we made in January 2018 for sites AB005 –Riverside and AB099 – Network Rail land, Napier Road for further explanation.

MM46 etc - 10 metre ecological buffer zone for watercourses

For the following site allocations we support the wording amendments to require a 10 metre buffer zone from the top of the bank of the watercourses at these sites.

- MM46 - CR13b, Forbury Retail Park
- MM48 - CR13d, Gas holder:
- MM52 - SR1a, Former landfill, island road:
- MM53 - SR4e part of former Berkshire brewery site part of former Berkshire brewery site
- MM53 - SR4f land south west of junction 11 of the M4 land south west of junction 11 of the M4

- MM40 - CR11g, Riverside

Please also read our letter to Reading Borough Council dated 16 November 2018 with more explanation about the importance of ecological buffer zones for watercourses.

Flood risk sequential test

In January 2018 we also made a soundness representation about the sequential test. These comments were:

“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.”

We have received no further information about this soundness point. Please can you let us know what the Inspectors conclusions were about the sequential test.

Final Comments

Once again, thank you for contacting us. Our comments are based on our available records and the information as submitted to us.

Please quote our reference number in any future correspondence.

If you have any queries please contact me.

Yours sincerely

Miss Michelle Kidd
Planning Advisor

Direct dial 02030259712

E-mail planning_THM@environment-agency.gov.uk

Reading Borough Council
Main Modifications to the Local Plan
June 2019
Representations Form



Please return by Wednesday 24th July 2019 to: Planning Policy, Civic Offices,
Bridge Street, Reading, RG1 2LU or email planningpolicy@reading.gov.uk

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	OX14 2RR	
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 Main Modification does this representation relate?

MM14

B2. Do you consider that the Local Plan as changed by the Main Modification(s): (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, as changed by the Main Modification(s), is or is not legally compliant, sound and/or complies with the duty to co-operate.

The Strategic Flood Risk Assessment (SFRA) is unsound as it is not consistent with national planning policy it is also not justified.

Functional floodplain definition in SFRA

I refer to the main modification paragraph MM14. In paragraph 4.2.100 you have stated:

“4.2.100 The SFRA also defines the extent of the functional floodplain within Reading. The 2017 SFRA, in describing how this has been approached, distinguishes between Flood Zone 3b ‘Functional Floodplain’ and Flood Zone 3b ‘Developed’. For clarity, the final definition on the flood zone maps F4 in the SFRA incorporates both of these categories, and it is this combined area which should be considered as Flood Zone 3b for the purposes of applying policy.”

We are pleased that you have tried to address the definition of ‘developed land.’ However it’s still not clear to us that this ensures that the SFRA does not promote more vulnerable and highly vulnerable in Flood Zone 3b (Functional floodplain).

In our representation form for the Regulation 19 local plan submission we also raised the point about the definition of ‘previously developed land’ and the potential misinterpretation of this definition. Our concern was that developers may take this to mean that any new development on land that is in functional floodplain will be appropriate as long as there is already a structure on the land regardless of what the structure is.

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, as changed by the Main Modification(s), legally compliant and/or sound. Please provide specific wording where possible.

Please confirm in the above paragraph you are now saying that any developed land as well as undeveloped land will be considered to be Flood Zone 3b. Therefore any proposed more or highly vulnerable development would not be permitted in accordance with Table 3 'Flood risk vulnerability and flood zone 'compatibility' of the Planning Practice Guidance? This needs to be clear for developers and applicants so they understand what to expect when proposing development.

In order to help you with this wording, we have the following suggested wording which we would provide clarity to see in the local plan supporting text for policy EN18: Flooding and Sustainable Drainage Systems and the SFRA:

“Development proposals in the ‘developed’ flood zone 3b will only be approved where the footprint of the proposed building(s) is not greater than that of the existing building(s). There must be no increase in development vulnerability or intensification in use and developers should proactively seek a reduction in risk.”

For the purposes of clarity you should also delete paragraphs 10.1.7 -10.1.9 from the Level 1 SFRA to avoid contradicting paragraph 4.2.100.

Please continue on another sheet if necessary

B5. 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 Main Modification does this representation relate?

MM41

B2. Do you consider that the Local Plan as changed by the Main Modification(s): (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, as changed by the Main Modification(s), is or is not legally compliant, sound and/or complies with the duty to co-operate.

Site allocations CR 11g and CR11i

The site allocations CR 11g and CR11i are unsound as they are not consistent with national planning policy, justified or effective.

Regarding paragraph 5.4.12 we are pleased that you have acknowledged that an assessment of the 35% and 70% allowances for climate change needs to be addressed if these sites include an area of Flood Zone 3. However this needs to be assessed in the SFRA level 2 evidence base now so you can determine whether site allocations CR11g and CR11i are going to be deliverable.

If the 35% or 70% allowances for climate change show that flood extents are increased then your site may not be deliverable. Please refer to our representation forms from the Regulation 19 response we made in January 2018 for sites AB005 –Riverside and AB099 – Network Rail land, Napier Road for further explanation.

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, as changed by the Main Modification(s), legally compliant and/or sound. Please provide specific wording where possible.

Please continue on another sheet if necessary

B5. 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 Main Modification does this representation relate?

MM48

B2. Do you consider that the Local Plan as changed by the Main Modification(s): (please tick as appropriate)

Is legally compliant?	Yes	<input 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 type="checkbox"/>

B3. Please provide details of why you think the Local Plan, or part of the plan, as changed by the Main Modification(s), is or is not legally compliant, sound and/or complies with the duty to co-operate.

<p>We support the inclusion of a 10 meter buffer zone from the top of the river bank to reflect its wildlife significance for site allocation CR13d, gas holder.</p> <p>Whilst there may not be specific policy or guidance that says the ecological buffer zone must be 10 metres wide from the top of the river bank on either side of the river, our expert opinion is that 10 metres provides the minimum width of buffer for the function of wildlife habitats whilst being able to facilitate informal access for enjoyment of the river.</p> <p>Rivers and the land adjacent to them form an important and effective part of a network of linked habitat corridors to allow the movement of species between suitable habitats, thus promoting the expansion of biodiversity.</p> <p>It is important that rivers and their associated corridors are protected from development through the establishment and appropriate management of buffer zones, and that opportunities are taken through redevelopment and the planning process to enhance their wildlife and landscape value.</p> <p>This approach is supported by the following legislation:</p> <p><u>The Environment Act 1995</u></p> <p>Section 6 of the Environment Act 1995 states that is the duty of the Environment Agency :</p> <ul style="list-style-type: none">• to promote conservation of inland and coastal waters;

- to promote the conservation of wildlife dependant on the aquatic environment;

By implementing this duty we have gained improvements to habitat and the aesthetic value of the river corridors while improving connectivity for people and wildlife and enhancing ecological networks.

The following national and local plan policy also promotes net gains in biodiversity and ecological networks including river corridors and their ecological buffers.

National Planning Policy Framework (NPPF)

The NPPF dated March 2012 recognises the importance of providing net gains for biodiversity in paragraph 109. Paragraph 109 also promotes establishing ecological networks. We believe river corridors and the provision of ecological buffer zones along these river corridors can provide habitats and networks for wildlife that are more resilient to current and future pressures such as climate change and development.

Paragraph 118 of the March 2012 NPPF says that opportunities to incorporate biodiversity in and around developments should be encouraged. The river corridors provide a great opportunity to do this because they are a natural existing habitat in the landscape and the ecological buffer zones would provide refuge for a variety of flora and fauna.

The revised NPPF dated July 2018 contains very similar paragraphs for biodiversity. We understand that the Reading local plan is being examined using the NPPF dated 2012.

Reading Local Plan Policy EN11

We are pleased to see that this policy says that waterspaces will be protected and enhanced. This includes rivers and watercourses. This policy also says that development needs to be set back from the watercourse by 10 metres “wherever practicable and appropriate in order to protect its biodiversity significance.” This provides the developers with flexibility as each individual development site will be assessed on its own merits.

Policy EN11 also asks for the protection and enhancement of habitats in line with national planning policy. It also recognises that there is a balance between habitat creation and access to rivers and urban uses. We are also pleased that Policy EN11 also asks for opportunities for deculverting of watercourses.

Please also read our letter to Reading Borough Council dated 16 November 2018 with more explanation about the ecological buffer zones for watercourses.

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, as changed by the Main Modification(s), legally compliant and/or sound. Please provide specific wording where possible.

Please continue on another sheet if necessary

B5. 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 Main Modification does this representation relate?

MM40

B2. Do you consider that the Local Plan as changed by the Main Modification(s): (please tick as appropriate)

Is legally compliant?	Yes	<input 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 type="checkbox"/>

B3. Please provide details of why you think the Local Plan, or part of the plan, as changed by the Main Modification(s), is or is not legally compliant, sound and/or complies with the duty to co-operate.

We support the inclusion of a 10 meter buffer zone from the top of the river bank to reflect its wildlife significance for site allocation CR11g, Riverside.

Whilst there may not be specific policy or guidance that says the ecological buffer zone must be 10 metres wide from the top of the river bank on either side of the river, our expert opinion is that 10 metres provides the minimum width of buffer for the function of wildlife habitats whilst being able to facilitate informal access for enjoyment of the river.

Rivers and the land adjacent to them form an important and effective part of a network of linked habitat corridors to allow the movement of species between suitable habitats, thus promoting the expansion of biodiversity.

It is important that rivers and their associated corridors are protected from development through the establishment and appropriate management of buffer zones, and that opportunities are taken through redevelopment and the planning process to enhance their wildlife and landscape value.

This approach is supported by the following legislation:

The Environment Act 1995

Section 6 of the Environment Act 1995 states that is the duty of the Environment Agency :

- to promote conservation of inland and coastal waters;
- to promote the conservation of wildlife dependant on the aquatic environment;

By implementing this duty we have gained improvements to habitat and the aesthetic value of the river corridors while improving connectivity for people and wildlife and enhancing ecological networks.

The following national and local plan policy also promotes net gains in biodiversity and ecological networks including river corridors and their ecological buffers.

National Planning Policy Framework (NPPF)

The NPPF dated March 2012 recognises the importance of providing net gains for biodiversity in paragraph 109. Paragraph 109 also promotes establishing ecological networks. We believe river corridors and the provision of ecological buffer zones along these river corridors can provide habitats and networks for wildlife that are more resilient to current and future pressures such as climate change and development.

Paragraph 118 of the March 2012 NPPF says that opportunities to incorporate biodiversity in and around developments should be encouraged. The river corridors provide a great opportunity to do this because they are a natural existing habitat in the landscape and the ecological buffer zones would provide refuge for a variety of flora and fauna.

The revised NPPF dated July 2018 contains very similar paragraphs for biodiversity. We understand that the Reading local plan is being examined using the NPPF dated 2012.

Reading Local Plan Policy EN11

We are pleased to see that this policy says that waterspaces will be protected and enhanced. This includes rivers and watercourses. This policy also says that development needs to be set back from the watercourse by 10 metres “wherever practicable and appropriate in order to protect its biodiversity significance.” This provides the developers with flexibility as each individual development site will be assessed on its own merits.

Policy EN11 also asks for the protection and enhancement of habitats in line with national planning policy. It also recognises that there is a balance between habitat creation and access to rivers and urban uses. We are also pleased that Policy EN11 also asks for opportunities for deculverting of watercourses.

Please also read our letter to Reading Borough Council dated 16 November 2018 with more explanation about the ecological buffer zones for watercourses.

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, as changed by the Main Modification(s), legally compliant and/or sound. Please provide specific wording where possible.

Please continue on another sheet if necessary

B5. 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 Main Modification does this representation relate?

MM46

B2. Do you consider that the Local Plan as changed by the Main Modification(s): (please tick as appropriate)

Is legally compliant?	Yes	<input 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 type="checkbox"/>

B3. Please provide details of why you think the Local Plan, or part of the plan, as changed by the Main Modification(s), is or is not legally compliant, sound and/or complies with the duty to co-operate.

We support the inclusion of a 10 meter buffer zone from the top of the canal bank to reflect its wildlife significance for site allocation CR13b, Forbury Retail Park.

Whilst there may not be specific policy or guidance that says the ecological buffer zone must be 10 metres wide from the top of the river bank on either side of the river, our expert opinion is that 10 metres provides the minimum width of buffer for the function of wildlife habitats whilst being able to facilitate informal access for enjoyment of the river.

Rivers and the land adjacent to them form an important and effective part of a network of linked habitat corridors to allow the movement of species between suitable habitats, thus promoting the expansion of biodiversity.

It is important that rivers and their associated corridors are protected from development through the establishment and appropriate management of buffer zones, and that opportunities are taken through redevelopment and the planning process to enhance their wildlife and landscape value.

This approach is supported by the following legislation:

The Environment Act 1995

Section 6 of the Environment Act 1995 states that is the duty of the Environment Agency :

- to promote conservation of inland and coastal waters;

- to promote the conservation of wildlife dependant on the aquatic environment;

By implementing this duty we have gained improvements to habitat and the aesthetic value of the river corridors while improving connectivity for people and wildlife and enhancing ecological networks.

The following national and local plan policy also promotes net gains in biodiversity and ecological networks including river corridors and their ecological buffers.

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Paragraph 118 of the March 2012 NPPF says that opportunities to incorporate biodiversity in and around developments should be encouraged. The river corridors provide a great opportunity to do this because they are a natural existing habitat in the landscape and the ecological buffer zones would provide refuge for a variety of flora and fauna.

The revised NPPF dated July 2018 contains very similar paragraphs for biodiversity. We understand that the Reading local plan is being examined using the NPPF dated 2012.

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Policy EN11 also asks for the protection and enhancement of habitats in line with national planning policy. It also recognises that there is a balance between habitat creation and access to rivers and urban uses. We are also pleased that Policy EN11 also asks for opportunities for deculverting of watercourses.

Please also read our letter to Reading Borough Council dated 16 November 2018 with more explanation about the ecological buffer zones for watercourses.

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, as changed by the Main Modification(s), legally compliant and/or sound. Please provide specific wording where possible.

Please continue on another sheet if necessary

B5. Do you wish to be kept informed of planning policy matters?
(please tick as appropriate)

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Please keep me informed of all planning policy matters:

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

B1. To which Main Modification does this representation relate?

MM52

B2. Do you consider that the Local Plan as changed by the Main Modification(s): (please tick as appropriate)

Is legally compliant?	Yes	<input 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 type="checkbox"/>

B3. Please provide details of why you think the Local Plan, or part of the plan, as changed by the Main Modification(s), is or is not legally compliant, sound and/or complies with the duty to co-operate.

We support the inclusion of a 10m undeveloped buffer to the top of the bank of the watercourse to the east for site allocation SR1a, Former Landfill, Island Road

Whilst there may not be specific policy or guidance that says the ecological buffer zone must be 10 metres wide from the top of the river bank on either side of the river, our expert opinion is that 10 metres provides the minimum width of buffer for the function of wildlife habitats whilst being able to facilitate informal access for enjoyment of the river.

Rivers and the land adjacent to them form an important and effective part of a network of linked habitat corridors to allow the movement of species between suitable habitats, thus promoting the expansion of biodiversity.

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Please continue on another sheet if necessary

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Please continue on another sheet if necessary

B5. 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: