

HAMBLETON, AMY

**From:** [Amy Hambleton](#)  
**To:** [Planning Policy](#)  
**Subject:** Response: Reading Borough Council – Local Plan Main Modifications - Ref. Policy CA1b  
**Date:** 22 July 2019 14:18:35

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

Dear Sir/Madam

I am writing to respond to the reworded entry for CA1b regarding the soundness of the plan. As a local resident, I feel very strongly about the impact any development on Reading Golf Course will have on my local area. I consider it crucial, therefore, that the wording on CA1b is totally clear and unambiguous.

The new clubhouse should be defined as “a permanent building similar in style and character to the current clubhouse, providing the same facilities and of an appropriate size for the new golf provision”.

The land remaining should include “permanent family-friendly golf provision on the land within Reading Borough and a permanent nine-hole golf course on the land within South Oxfordshire, as proposed in the Reading Golf Club/Waters submission to the Inspector” and not for further housing.

There also need to be enough provision for the new Healthcare provision and new Golf clubhouse within CA1b. This would mean the number of dwellings originally included in the submission for CA1b (90-130 dwellings) should be reduced.

Explicit clarification needs to be made on what measures are proposed to deal with the extra traffic this development will generate. Also, what road safety measures are proposed? There are a large number of young children who access Emmer Green park close by.

I am also concerned that we have not had any air pollution tests since 2015. The volume of traffic around Emmer Green and Caversham has grown considerably since then, with over 100 new homes being built in nearby Sonning Common. The negative impact of pollution on the health of our community is of major importance.

Yours faithfully

Amy Hambleton

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HANSHAW, CHRIS, HEATHER AND RUBY

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**From:** Chris and Heather Hanshaw  
**Sent:** 16 July 2019 08:21  
**To:** Planning Policy  
**Subject:** Reading Golf Club, CA1b, Main Modification MM59

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

Dear Planning Dept.,

Re:- Reading Golf Club, CA1b, Main Modification MM59

We are writing to indicate our full support and endorsement of KEG's comments and suggested improvements and enhancements to the revised wording in CA1b. It is important that there is no ambiguity or misunderstanding and we believe the suggested improvements are important.

Yours faithfully

Chris, Heather and Ruby Hanshaw

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HARRISON, BARBARA

**From:** [Barbara Harrison](#)  
**To:** [Planning Policy](#)  
**Subject:** Planning application for Reading Golf Course  
**Date:** 21 July 2019 11:48:01

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

Dear Sirs

Reading Borough Local Plan - Consultation on Main Modifications

I have the following comments on the proposed modifications regarding CA1b (Reading Golf Club land). My comments relate to the soundness of the plan.

1. The requirement for a new healthcare provision should be amended to clearly identify the scope and size of the facility required to meet this condition.
2. Road safety is a very important matter given the proximity of the children's playground, the playing fields and the narrow roads in the approach to the Golf Club entrance. Proper provision for these matters should be made a condition.
3. Parking within the site must be adequate for all facilities to avoid street parking by residents, healthcare facility users and people using the sporting facility.
4. The number of houses to be built should be reduced from the original 90-130 as much space will be used up by the clubhouse and healthcare facility.
5. The new clubhouse should be located away from existing and planned housing and should be of a sympathetic design in relation to the surrounding properties.

Yours faithfully

(Mrs) Barbara Harrison

HERMES PLC

24 July 2019

**Delivered by email**

Planning Policy  
Reading Borough Council  
Bridge Street  
Reading  
RG1 2LU

To whom it may concern

## **RBC MAIN MODIFICATIONS LOCAL PLAN CONSULTATION – ST MARTIN’S CENTRE, CAVERSHAM DISTRICT CENTRE**

We are writing on behalf of Hermes PLC to provide representations to the Reading Local Plan Main Modifications consultation in respect of its land interests at St Martin’s Centre in Caversham District Centre.

### **CONTEXT**

We submitted representations previously to support the Local Plan Examination in October 2018 with a specific focus on emerging Policy RL3 (Vitality and Viability of Smaller Centres) of the Local Plan. These representations sought amendments to emerging Policy RL3 given we considered that as drafted the policy was overly restrictive and inconsistent with national policy guidance as it would undermine the vitality and viability of St Martin’s Centre. The principle concerns related to the following:

- The policy continues to impose restrictions on shopping frontages, rather than defined shopping areas as required under the Framework;
- The structural changes within the retail market where other uses (A3-A5,D2) are contributing significantly to supporting the vitality and viability of Centres rather than A1,A2 uses is not reflected within the draft policy which seeks to only support uses that are in decline; and
- There is little emphasis on the ability for ‘main town centre uses’ to contribute towards the vitality and viability of Centres, with the application of the policy resulting in the refusal of planning applications where they would support the vitality and viability of the Centre.

In this context we have reviewed the proposed main modifications which were published by Reading Council on 12 June 2019. Our Client welcomes the principle of the proposed amendments to the policy, which reflect the discussions with the Planning Inspector at the relevant Hearing Session (Issue 9 – Question 3) held on 2<sup>nd</sup> October 2018. At this session, it was recognised by both the Inspector and

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Council Officers that further consideration needs to be given to the specific wording and future application of the emerging retail policies in light of the on-going regeneration of St Martin's Centre, at the heart of Caversham District Centre. .

Whilst the main thrust of the proposed main modifications is supported, we do consider there are a number of amendments or matters of clarification required to ensure that these modifications satisfy para 16. of the National Planning Policy Framework ('the Framework') (February 2019). This h requires Local Plans to contain '*policies that are clearly written and unambiguous, so it is evident how a decision make should react to development proposals*'. At present, we do not consider this is achieved through the main modifications and we discuss these in turn below. We also consider that the amendments proposed do not fully accord with the Framework, in relation to ensuring the vitality and viability of the district centres, and are therefore unsound.

## **POLICY RL3 PROPOSED MODIFICATIONS**

The proposed modifications to policy RL3 are highlighted in bold below:

*a) Within the key Frontages (identified on the Proposals Map), development involving net loss of A1 retail or A2 financial professional to other 'centre uses' will only be permitted where:*

- *There would be no more than 3 consecutive units which are not in A1 or A2 retail use; and*
- *The proportion of the total length of the Key Frontage within the centre that is in A1 or A2 use would exceed the relevant proportion below:*

*Caversham, Cemetery Junction, Tilehurst Triangle and Whitley District Centre, Christchurch Road, Coronation Square, Wensley Road and Whitley Wood Local Centres - 60%*

*Emmer Green, The Meadway, Oxford Road West and Shinfield Road District Centres, Wokingham Road Major Local Centre, Basingstoke Road North, Dee Park, Erleigh Road and Northumberland Avenue North Local Centres - 50%*

*Whitley Street Major Local Centre - 40%*

*b) Within district, major local and local centres, development will be permitted provide that:*

- *There will be no more than 2 consecutive A5 takeaways, and no more than 30% of the length of the Key Frontage would be in takeaway use; and*
- *There would be no net loss of 'centre uses' for 'non-centre' uses at the ground floor (apart from entrances to upper floors) except in exceptional circumstances. On upper floors, other uses including residential ('living over the shops') will be acceptable.*

*c) Within and adjacent to district, major local and local centres, all new development should provide some 'centre' uses at the ground floor, unless it can be clearly demonstrated that this would not be possible or appropriate.*

***d) Where the Key Frontages within a centre as identified on the Proposals Map are proposed to significantly change, or have already significantly changed as a result of redevelopment, meaning that criteria a) and b) cannot be applied, proposals should ensure that a strong retail character is retained within the ground floor of the centre, and that ground floor concentrations of consecutive units not in A1 or A2 use, in particular A5 takeaway, are avoided.***

*4.6.18 Criterion (b) has two purposes. Firstly, concentrations of takeaways can have a negative effect on the amenity of residents, and can also change the character of the street. Its other purpose is to prevent inappropriate uses, particularly housing, from encroaching on centres at the ground floor and*

*permanently removing shop units or other facilities. Elsewhere in the country, whole centres have been lost in this way. However, it is important that uses such as housing and offices are integrated into centres at upper floors to ensure diversity and good access to jobs and housing. Exceptional circumstances are those where it can be clearly demonstrated that the only alternative to loss of the unit to any 'centre use' is long-term vacancy (e.g. that it could be expected to be vacant for longer than 5 years).*

*4.6.19 Finally, criterion (c) recognises the fact that opportunities for expansion of these centres are relatively rare, and therefore, where they do occur, they should be seized, in order to enhance the role of centres in serving their local communities.*

*4.6.20 Where the policy includes the term 'consecutive' under (a) and (b), this includes where units are separated by the entrance to a side-street or footpath, or any other small gap between buildings.*

*4.6.21 References to 'key frontage' in this policy, e.g. for proportion of A1/A2 use, will not be capable of being applied where there is a comprehensive development of a centre, **or a part of a centre**, that significantly alters the frontages. **In such a case, developments need to be judged against other policies, notably RL1 criterion d) of the policy.***

*4.6.22 This policy does not apply to the town centre of Reading. A different approach is required there, which is dealt with in Policy CR7."*

#### **Proposed Modification – criteria d)**

We support the inclusion of any additional criteria (point d) to the policy relating to centre redevelopment proposals. However, we have concerns regarding the wording of this criteria and the lack of reference to St Martin's Centre.

In relation to the latter point, we consider that St Martin's Centre should be specifically referenced as an example within the supporting text. There is an extant planning permission (ref. 140997) targeting the regeneration of the Centre, and our client is committed to delivering the regeneration of the St Martin's Centre. We therefore request that explicit reference is made within the policy or supporting text to confirm that point d) of the policy applies to proposals at St Martin's Centre.

This will ensure that there is clarity in the application of the policy and no ambiguity with regard to development proposals at St Martin's Centre and how Policy RL3 should be applied. It would also ensure that the Local Plan responds to PPG para 005 Ref ID: 2b-005-20140306 which references the need for Local Plan's to clearly articulate 'relevant sites'. The future role and function of St Martin's Centre is fundamental to the future health of the Caversham District Centre.

Whilst the addition of criteria d) is welcome to differentiate those proposals for significant development within a district centre, we consider the wording still places too much reliance on A1/A2 uses and is significantly out-of-step with the dynamics of the retail market. As highlighted in our Hearing Statement, the retail market is witnessing unparalleled structural change; in particular, the loss of A1 and A2 retailers from smaller and middle-ranking centres. Even with the introduction of criteria d) the policy is based on the premise that the vitality and viability of 'smaller centres' is sustained by A1 and A2 uses alone. Although such uses continue to be important, other uses (in particular A3-A5 and D2) contribute significantly and increasingly to the commercial and social fabric of smaller centres. The market is evolving rapidly and the policy as worded is based on a historic rather than contemporary perspective. We suggest that the reference to "strong retail character" and "ground floor concentrations of consecutive units not in A1/A2 use should be removed", and replaced with reference to "a diverse mix of town centres uses is provided within the centre which contribute positively to the vitality and viability of the centre as whole".

This more flexible approach more appropriately reflects the dynamics of the market, in particular the growth of A3-A5 and leisure sectors and the important role these uses play in creating a vital and viable centre promoting a 'positive strategy for the future'<sup>1</sup> of the Centre. Incorporating this flexibility within the policy would enable Planning Officers to consider significant development schemes within centres on their merits and reflect market demands and emerging trends at the time. To ensure our centres are able to evolve and maintain their central role in our communities it is essential they are able to adapt to market requirements and not unduly stifled by out dated and overly restrictive policy.

### **Modification Requested**

In view of the above, we request the following modification is made to Policy RL3 d)

***d) Where the Key Frontages within a centre as identified on the Proposals Map are proposed to significantly change, or have already significantly changed as a result of redevelopment<sup>2</sup>, meaning that criteria a) and b) cannot be applied, proposals should ensure that a diverse mix of town centre uses are provided within the centre which contribute positively to the vitality and viability of the centre as a whole. ~~strong retail character is retained within the ground floor of the centre, and that ground floor concentrations of consecutive units not in A1 or A2 use, in particular A5 takeaway, are avoided.~~***

<sup>1</sup> Applicable to St Martin's Centre, Caversham

### **Supporting text – 4.6.18**

On the modifications proposed to the supporting text to the policy, the additional clarification relating to retail unit vacancy '(e.g. that it could be expected to be vacant for longer than 5 years)' fails to address the concerns raised at the Hearing Session. This particularly relates to how the Local Plan will respond to changing market signals.

PPG Para. 004 ID:2b-004-2014 states that Local Authorities should use market signals to inform policies 'that are responsive to changes in the market as well as changing needs of business'. Firstly, reference to 5 years is excessive and neither justified nor appropriate. Planning for such an extensive period of vacancy will not support the vitality and viability of the town centre. Whilst we disagree with the application of an arbitrary timescale at all in this policy and do not consider it represents sound policy, if an arbitrary timescale is required then a 18 months to 2 year threshold would be more appropriate.

Secondly, as drafted, the policy or supporting text does not make clear the level of marketing evidence required to demonstrate a long term vacancy would occur if the unit was not reoccupied by a non 'town centre' use. The terminology 'it could be expected' is ambiguous and does not provide certainty on how a planning application would be determined. In particular, how would 'expected vacancy length' be assessed, and what evidence would be required to be submitted to demonstrate the forecast length of vacancy.

### **Modification Requested**

In view of the above, we request the following modification is made to supporting para 4.6.18:

Exceptional circumstances are those where it can be clearly demonstrated through **marketing evidence**<sup>3</sup> that the only alternative to the loss of the unit to any 'centre use' is long-term vacancy for a period of 2 years or where there is demand for other town centre uses arising from a lack of site availability<sup>4</sup>.

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<sup>1</sup> Paragraph 85 (b) of the Framework 2018

<sup>3</sup> Any planning application should be accompanied by supporting evidence from the Applicant which could include marketing leaflet/brochure, marketing price, confirmation of marketing period and interest received.

## Supporting text – 4.6.21

When considering the modification to para 4.6.21, it is requested that St Martin's Centre is referenced by way of any example of a district centre where the comprehensive development of part of an existing centre is being proposed.

### **Modification Requested**

It is requested the following modification is made to supporting para 4.6.21

4.6.21 References to 'key frontage' in this policy, e.g. for proportion of A1/A2 use, will not be capable of being applied where there is a comprehensive development of a centre, **or a part of a centre**, that significantly alters the frontages. **In such a case, developments need to be judged against other policies, notably RL3 criterion d) of the policy such as St Martin's Centre, Caversham District Centre.**

## SUMMARY

The above modifications are considered necessary to ensure that the emerging policy meets the requirements of the National Planning Policy Framework 2012 with regard to ensuring that the Town Centres remain competitive and allow flexibility to ensure that where *'town centres are in decline, local planning authorities should plan positively for their future to encourage economic activity'*<sup>5</sup>.

As drafted, the policy remains overly restricted and will undermine the vitality and viability by failing to recognise the role that other town centre uses other than A1 and A2 uses can play in supporting existing Centres. This is contrary to the Framework. This position is further exacerbated by the supporting text which appears to support unit vacancies of 5 years or more which could contribute towards the decline of the existing Centres and fail to create resilient town centres which are intended to be at the heart of communities.

It also considers that the policy, given the structural changes occurring within the retail sector, should reflect the position adopted by the National Planning Framework 2019 by being drafted such that it can *'respond to rapid changes in the retail and leisure industries'*<sup>6</sup> This is a clear acknowledgement of the well-evidenced changes occurring within the retail marketing with a significant decline in A1/A2 uses. By failing to propose a flexible emerging policy up to 2036, there will be a lack of opportunity for Town Centres to *'grow and diversify'*<sup>7</sup> with limited site availability for main-town centre uses which **do** contribute to the vitality and viability of these Centres.

More specifically, as discussed at the Local Plan Hearing Sessions, reference should be made to St Martin's Centre within Policy RL3(d) in light of the significant long-term investment our Client is making towards the regeneration of Centre. The policy needs to be explicit that the St Martin's Centre is one example where the policy will be applied to provide clarity for any future planning applications under the policy. Given our Client's long term commitment to the site, Policy RL3(d) needs to also reflect that the

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<sup>5</sup> Paragraph 23 of the Framework (2012)

<sup>6</sup> Paragraph 85 of the Framework (2019)

<sup>7</sup> Paragraph 85 of the Framework (2019)

emerging Local Plan covers the next 15 years and a positive approach with regard to recognising the role that all main town centre uses will play in supporting its long term vitality and viability.

We trust this representations will be given due consideration in the finalisation of the emerging Reading Plan. Should you require clarification on the above or wish to discuss further, please do not hesitate to contact me at this office.

Yours sincerely



PP Hannah Knowles  
Senior Planner

[hannah.knowles@turley.co.uk](mailto:hannah.knowles@turley.co.uk)

HICKS, JM

**From:** [John Hicks](#)  
**To:** [Planning Policy](#)  
**Subject:** Reading Borough Council - Local Plan Main Modifications - Policy CA1b  
**Date:** 23 July 2019 21:53:08

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Dear Policy Planning Team

I wish to make the following comment on the modifications to the Local Plan – Policy CA1b – Ref MM59

The revised wording refers to residential development being subject to “the future provision of golf on the remainder of the Golf Club site”. The word “future” should be deleted. No residential development should be allowed to take place until the new golf facilities on the remainder of the Golf Club site within the borough are planned, approved, constructed and in full operation. This must include a new clubhouse with suitable access road, parking and the necessary course maintenance facilities. The golf facilities should be provided in perpetuity enforced by a legal agreement.

Yours faithfully

Mr J M Hicks

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HIGGINS, GWEN



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**From:** Gwen Higgins  
**Sent:** 23 July 2019 14:17  
**To:** Planning Policy  
**Subject:** policy CA16. Local plan modifications

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I wish to register my objections to the construction of housing on the Reading Golf Club.

Firstly Kidmore End Road, due to parking out side property, is mainly only single track and as the road is a busy one constant hold ups occur. Entrance to the golf club is already busy and hundreds of houses would make it very dangerous especially for children. Already many people working in Reading park on existing side roads and use the excellent bus service into town.

Secondly, the destruction of one of the few green open spaces and loss of trees is a damage to the environment.

Thirdly, the shortage of medical provision is already a great problem.

Fourthly, school space is at a premium.

I appreciate that housing is important but surely there are more suitable places in the Reading area than destroying a beautiful area.

G. J. Higgins

HIGGINSON, SHEILAH

READING BOROUGH COUNCIL

18 JUL 2019

PLANNING

16<sup>th</sup> July 2019

Dear Sir/Madam

Reading Borough Council Local Plan

CA1b Part of Reading Golf Course, Kidmore End Road.

Para CA1b - Main Modification – you say provision of golf on remainder of land to secure important sports and leisure for Reading – but access is the main problem and will impact on already overstretched community infrastructure.

Kidmore End Road is already over used – off peak the other weekday mid-morning awaiting a bus I was passed by 30 cars/vans/ lorries etc in 5 minutes = 360 an hour. Prior to school its pedestrians, cyclists – children and adults, utility vehicles and cars. Highdown Hill is narrow and connecting roads pass Highdown School and very near Emmer Green Primary school – air pollution a big consideration. All these routes lead to Peppard Road which takes heavy traffic from Oxfordshire and Henley and via Sonning Bridge from the Wokingham area. You add healthcare – yes green open land with trees is important but dangerous particles have dire consequences to health particularly growing children's lungs. Healthcare appears to be added as an afterthought, or do you propose to include a doctor's surgery in the development – which would increase traffic even more!

“Vehicular access be retained for golf” – the population of people living near to the golf club should have priority over the much smaller number of golfers. No consideration has been given to the wild life that exists on the course at the present time.

Parking – The other day 3 cars parked on Kidmore End Road opposite the Golf Club bus stop (blocked road when bus arrived). Three more cars, just clear of path, parked at West end of Chalgrove Way. Changes to parking in Reading

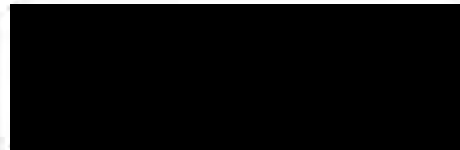
soon moves the problem out on to bus routes, in this case Nos 23 and 24, where commuters leave their cars then catch a bus into town.

"8.3.2 ..... what sports and leisure facilities in Policy RL6? Residential development on part of RCG site (CA1b) is dependent on ensuring future use of remaining land for golf, but how can you guarantee vehicular access from suitable roads where they don't exist. Who would obtain the legal agreement to ensure golf function is retained as the Reading Golf Club have already agreed a move to Caversham Heath Golf Course. This legal agreement to ensure a replacement clubhouse and vehicular access from suitable roads – our roads are already at breaking point!

Under the 'Reason' column you refer to a submission by Wates Developments Ltd. but they have already sold the land on, so no longer involved in this matter.

I trust that you will seriously consider my very valid comments.

Yours faithfully,

A large black rectangular redaction box covering the signature area.

Planning Policy Team, Reading Borough Council

## HIGHWAYS ENGLAND

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**From:** Townend, Zoe  
**Sent:** 26 June 2019 15:37  
**To:** Planning Policy  
**Cc:** Blake, Patrick; Ginn, Beata; Strongitharm, Glen; Planning SE  
**Subject:** Reading Borough Local Plan – chance to comment on Main Modifications to the Local Plan Consultation

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**FAO: Planning Policy Team**

**Our Ref: 7911**

**Reading Borough Local Plan – chance to comment on Main Modifications to the Local Plan Consultation**

Dear Planning Policy Team

Thank you for consulting Highways England in relation to the proposed main modifications to the Reading Borough Local Plan to 2036.

Highways England has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. In this case Highways England's interests relate to the potential impact of development on the M4.

We would be concerned if any material increase in traffic were to occur on the SRN as a result of planned growth within Reading Borough without careful consideration of mitigation measures. It is important that the Local Plan provides the planning policy framework to ensure development cannot progress without the appropriate infrastructure in place.

When considering proposals for growth, any impacts on the SRN will need to be identified and mitigated as far as reasonably possible. We will support a local authority proposal that considers sustainable measures which manage down demand and reduce the need to travel. Infrastructure improvements on the SRN should only be considered as a last resort. Proposed new growth will need to be considered in the context of the cumulative impact from already proposed development on the M4.

This correspondence follows on from our previous response dated 7 September 2018, produced in response to the earlier Submission Draft Reading Borough Local Plan consultation for which our comments remain. Only new/amended policy items are considered below.

We have undertaken a review of the latest information and have the following comments in addition to our previous comments on the Local Plan submitted on 29 March 2018:

**Schedule of Proposed Draft Main Modifications – June 2019**

**Main Modification MM17: H1: PROVISION OF HOUSING**

Provision will be made for at least an additional 15,847 homes (as opposed to the previously submitted figure of 15,433 homes) (averaging an increase from 671 to 689 homes per annum) in Reading Borough for the period 2013 to 2036. The Council have confirmed that they will continue to work with neighbouring authorities within the Western Berkshire Housing Market Area to ensure that the shortfall of 230 dwellings (reduced from the submitted figure of 644 homes) that cannot be provided within Reading will be met over the plan period.

**Main Modification MM27:**

The Main Modification states that “A new park and ride is permitted at Thames Valley Park in Wokingham, and 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.” We would welcome the opportunity to work closely with RBC in relation to understanding any potential impact on the SRN as a result of these proposals, in the absence of any existing evidence for sites in addition to Thames Valley Park.

**Sustainability Appraisal (SA) of Main Modifications**

**Main Modification H12(iv):** Policy to direct student accommodation to accessible areas

This main modification relates to a policy that would state that student accommodation would be on campus or existing student locations, or in other accessible areas. Highways England is supportive of policies that encourage sustainable development and access to public transport to reduce the demand on the SRN.

I hope that this is helpful.

Kind regards,

**Zoe Townend, Area 3 Spatial Planning Assistant Manager**

Highways England | Bridge House | 1 Walnut Tree Close | Guildford | Surrey | GU1 4LZ

Web: [www.highwaysengland.co.uk](http://www.highwaysengland.co.uk)

*Please note that I only work on Thursdays. For an urgent response please contact Patrick Blake.*

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## HISTORIC ENGLAND





Historic England

Our ref: PL00014674

Planning Policy Team  
Civic Offices  
Bridge Street  
Reading RG1 2LU

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

19 July 2019

Dear Sir/Madam

### Reading Borough Local Plan: Consultation on Main Modifications

Thank you for consulting Historic England on the main modifications for the Borough's Local Plan. As the Government's statutory adviser, Historic England is keen to ensure that conservation and enhancement of the historic environment is fully taken into account at all stages and levels of the planning process.

We note and welcome the several amendments made in response to previous Historic England comments on various elements of the draft Plan. However, while we acknowledge that the current consultation deals only with the main modifications put forward by the Inspector, and not previous comments/proposed amendments not taken forward, we would take this opportunity to reiterate our concerns regarding the Evidence Base and Section 4.2. A copy of previous correspondence on these issues is attached elsewhere to this letter, but in essence we continue to consider that the historic environment evidence base does not comply with the NPPF in terms of its adequacy or being up to date, or that that policy EN1 does not reflect the requirements of para 154 of the 2012 NPPF.

Finally, we should like to stress that this opinion is based on the information provided by you. To avoid any doubt, this does not affect our obligation to provide further advice or potentially object to specific proposals, where Historic England consider it appropriate to do so.

Yours sincerely



Historic England, 4<sup>th</sup> Floor, Cannon Bridge House, Dowgate Hill, London EC4R 2YA  
Telephone 020 7973 3700 Facsimile 020 7973 3001  
[HistoricEngland.org.uk](http://HistoricEngland.org.uk)

Please note that Historic England operates an access to information policy.  
Correspondence or information which you send us may therefore become publicly available.





Historic England



Tim Brennan MRTPI

Historic Environment Planning Adviser

E-mail: [tim.brennan@HistoricEngland.org.uk](mailto:tim.brennan@HistoricEngland.org.uk)

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Historic England

Ms Sarah Burr  
Planning Policy Officer, Planning Section  
Directorate of Environment and Neighbourhood  
Services  
Reading Borough Council  
Civic Offices  
Bridge Street  
Reading, RG1 2LU.

Our ref:  
Your ref:

Telephone 01483 252040  
Fax

29<sup>th</sup> June 2018

Dear Sarah,

### **Reading Borough Local Plan - Examination**

Thank you for sending through the schedules setting out the Council's responses to our comments and the changes that the Council is proposing to make to reflect those comments. We are grateful to the Council for proposing changes to address some of our comments.

#### Section 1.5

We note and welcome, in principle, the Council's Heritage Background Paper. However, we note that this is dated March 2018 which would indicate that it has been written (possibly in response to our comment) to retrofit the Plan rather than having been prepared to guide the Plan's production (as would its absence from the Technical Studies and Background Documents webpage). It also contains a number of errors which suggests that it was written in haste.

We welcome the references to the Conservation Area Appraisals, Draft Heritage Statement, National Heritage List for England and the Berkshire Historic Environment Record. However, we note that the Paper identifies gaps in the evidence base for the Plan i.e. the outdated archaeological survey (*"as the last archaeological survey of the historic town centre was carried out in 1978, the true extent of buried archaeological remains in Reading is not known"*).

Also the lack of a survey of Grade II listed buildings to see if any are at risk of neglect, decay or other threats (*"There is no information available on the condition of Reading's listed buildings, as no borough-wide buildings-at-risk or condition surveys have ever been undertaken"*), which is not entirely accurate as Historic England monitors the condition of Grade I and Grade II\* listed buildings).

We therefore remain concerned that the historic environment evidence base for the Local Plan is neither adequate nor up-to-date as required by the National Planning Policy Framework.



Historic England, Eastgate Court, 195-205 High Street, Guildford GU1 3EH  
Telephone 01483 25 2020 [HistoricEngland.org.uk](http://HistoricEngland.org.uk)

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.



### Paragraph 3.2.5

We welcome the Council's acknowledgement that the historic environment should not always be seen just as a constraint.

### Paragraph 3.2.11

We welcome the Council's proposed change to the text of this paragraph as we suggested.

### Section 4.2 - Heading

We are disappointed that the Council is not proposing to alter the heading as we suggest, particularly as the Council understands our reasoning and accepts that the historic environment does not fall entirely within the "built environment". We do not consider the Council's reason for not proposing the change to recognise the historic environment in its own right as the National Planning Policy Framework does to be satisfactory but if the concern is "overcomplicating" the heading then it could be "The Historic and Natural Environment". Therefore our concern remains.

### Section 4.2

We are disappointed that the Council is not proposing to add a policy or policies to the Plan setting out the important elements or characteristics of listed buildings and registered historic parks and gardens to which development proposals should have regard and seek to conserve or enhance.

It is interesting that the Council's Historic Environment Background Paper's conclusions on relying on Policy EN1 for Conservation Areas: "*This alternative would rely on EN1 and would grant cursory protection to Conservation Areas as a type heritage asset, but fails to highlight specific issues in Conservation Areas. A separate policy draws attention to an important issue.....*". The Background Paper does not consider whether or not there should be separate policies for listed buildings and/or historic parks and gardens at all.

Not only do we consider that Policy EN1, whilst adequate as the strategic policy required by the National Planning Policy Framework, does not satisfy the requirements of paragraph 154 of the Framework, but it is also incorrect to say that "*details regarding the important elements and characteristics of listed buildings and registered historic parks and gardens are detailed in the Historic England listing for each asset*". The list descriptions were originally intended simply to enable identification of the asset, not to explain what was important or significant about it. Therefore our concern remains.

### Paragraphs 4.2.1 – 4.2.24

We welcome the Council's changes in respect of paragraphs 4.2.2. and 4.2.23.



Neither paragraphs 4.2.10 nor 4.2.11 explain the difference between designated and non-designated assets, nor do they make it clear into which category the assets set out in paragraph 4.2.11 fall. We were aware that paragraph 4.2.11 refers to the five Historic Parks and Gardens in the Borough but our point is that these should be identified as Registered Historic Parks and Gardens to make it clear that they are designated heritage assets. We note the Council's responses to our comments on paragraphs 4.2.12 but maintain those comments (we note that the Council is willing to make one of the changes we seek to this paragraph to Policy CR10).

### Policy EN2

We welcome the Council's proposed change as we suggested.

### Policies H8 and H9

Policy EN1 requires that development proposals seek to conserve or enhance '*historic features, areas of historic importance and other elements of the historic environment*'. We have welcomed the policy as a strategic policy for the conservation and enhancement of the historic environment but consider that a more detailed development management policy on listed buildings should be included in the Plan for it to accord with Paragraph 154 of the National Planning Policy Framework.

Such a policy would address our concerns with Policies H8 and H9, but in the absence of such a policy, we would still welcome the strengthening of Policies H8 and H9 as we suggest (and as the Council has agreed for Policy OU3).

### Policy OU3

We welcome the Council's proposed change to Policy OU3 as we suggest.

### Policy CR2

We maintain our comment – it could be argued that Policy CC7 obviates the need for Policy CR2 altogether.

### Policies CR3 and CR10

We welcome the Council's proposed changes to Policies CR3 and CR10 as we suggest.

### Policies CR11c, CR12e and CR13c

We acknowledge that criteria vi) of Policy CR11, v) of Policy CR12 and v) of Policy CR13 afford general protection for designated heritage assets. However, the inclusion of the reference to the listed Station building in CR11c would be consistent with the references to listed buildings in CR11a and heritage assets in CR11d.



Likewise a reference to the St Mary's Butts and Castle Street Conservation Area and a number of listed buildings in CR12e would be consistent with the reference to listed buildings in CR12b and heritage assets in CR12c, and a reference to the listed buildings south of Gasworks Road in CR13c would be consistent with these identified references in Policies CR12 and CR13. We therefore maintain our comments.

### Policy CR12

We acknowledge that criterion vi) already includes "which should inform the development".

### Policy CR13a

We maintain our comment re residential use – we are not asking the Council to rule out residential as a possible future use for the prison building, merely to make it the last resort. We accept the Council's response to our comment re the numbers of houses.

### Paragraph 7.2.1

We welcome the Council's proposed change to paragraph 7.2.1 as we suggest.

### Paragraph 7.2.7

We accept the Council's response to our comment on this paragraph.

### Policy CA1f

We welcome the Council's proposed change to Policy CA1f as we suggest

### Policy CA2

We accept the Council's response to our comment on this Policy.

In conclusion, we would be pleased to sign a Statement of Common Ground in respect of the Council's proposed changes that address our concerns and where we accept the Council's response to our comments. We would also be pleased to discuss our outstanding concerns further, particularly regarding the Evidence Base, Section 4.2 and Policy CR13a which we consider to be matters of soundness.

We hope these comments are helpful. Please contact me if you have any queries. Thank you again for affording Historic England this opportunity.

Yours sincerely,



Martin Small, Principal Adviser, Historic Environment Planning



Historic England, Eastgate Court, 195-205 High Street, Guildford GU1 3EH  
Telephone 01483 25 2020 [HistoricEngland.org.uk](http://HistoricEngland.org.uk)

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Correspondence or information which you send us may therefore become publicly available.



HOLMES, J

**From:** [Jon Holmes](#)  
**To:** [Planning Policy](#)  
**Subject:** Reading Borough Council - Local Plan Main Modifications - Policy CA1b  
**Date:** 23 July 2019 17:20:29

---

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

Reading Borough Council - Local Plan Main Modifications - Policy CA1b

I have some suggestions relating to the soundness of the modifications to the plan concerning Policy CA1b, Main Modification MM59: developments on part of Reading Golf Club.

Impact on healthcare

We have seen two of our GPs' surgeries close recently and the length of time we have to wait before getting an appointment to see a doctor is increasing. Addition of new houses in the Emmer green area (via infill and proposed developments on our remaining 'green spaces') are making matters worse unless the developers are forced to build new healthcare infrastructure. I would like to see more specific wording on "mitigating impacts on community infrastructure, including for healthcare" to ensure that the housing development is accompanied by the provision of a new GPs' surgery. The wording should be made more specific to require "the provision of a new healthcare facility to include a GPs' surgery and the associated medical infrastructure, with adequate on-site parking for staff and visitors."

The legal agreement described in the new paragraph (8.3.2) should require the replacement of the clubhouse and provision of the new healthcare facility before residential development begins.

J Holmes

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## HOME BUILDERS FEDERATION

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

24/07/2019

Dear Sir/ Madam

**Response by the House Builders Federation to the main modifications to the Reading Local Plan**

Thank you for consulting the Home Builders Federation (HBF) on the main modifications. The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational corporations through to regional developers and small local housebuilders. Our members account for over 80% of all new housing built in England and Wales in any one year.

**MM19**

The proposed modification goes some way to addressing our concerns regarding the impact of small site affordable housing contributions on smaller developers. However, whilst it enables a less onerous viability test for such developments, we continue to consider the approach taken in this policy to be inconsistent with national policy. The Council have not adequately justified its decision to depart from the Written Ministerial Statement (now established in paragraph 63 of the National Planning Policy Framework) and as such the policy requiring contributions on developments of less than 10 dwellings should be deleted.

**MM21**

We support the modifications made to this policy but continue to consider there to be no justification for the Council requiring all homes to be built to part M4(2) of the Building Regulations.

We hope these representations are of assistance in taking the plan forward to the next stage of plan preparation and examination. Should you require any further clarification on the issues raised in this representation please contact me.

Yours faithfully



Mark Behrendt MRTPI  
Planning Manager – Local Plans



Home Builders Federation  
Email: [mark.behrendt@hbf.co.uk](mailto:mark.behrendt@hbf.co.uk)  
Tel: 020 7960 1616

HOWARD, B

**From:**  
**To:** [Planning Policy](#)  
**Cc:**  
**Subject:** Reading Golf Club site - Local Plan consultation  
**Date:** 24 July 2019 21:50:39

---

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

Please acknowledge receipt of this email as a response to the Local Plan consultation, within the consultation period, on 24 July 2019 regarding Reading Golf Course land. I am B. Howard, [REDACTED]. I do not want my name or address released to the public, unless my name is required to be shown on the consultation repossess document. My comments are as follows:

Regarding:

Part of Reading Golf Club, CA1b, Main Modification MM59 in the new consultation document "READING BOROUGH LOCAL PLAN CONSULTATION ON MAIN MODIFICATIONS JUNE 2019".

#### 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 or smaller"
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"- that is proper facilities, not a fudge to get round the planning system and the Inspector's intent.
4. Addition of the word "entire" to the phrase "on the remainder of the *entire* Golf Club site" would make the wording more in line with the Inspector's intent and less likely to be abused when planning is or may be applied for.
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." It should be of an appropriate size and not too small.
6. The onsite provision of open space is also welcomed but size of the area should be clearly defined and acceptable to the local community.
7. Road safety in the vicinity of the CA1b site, including Courtenay Drive, Kidmore End Road, Chalgrove Way and Grove Road, 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, and walking to Emmer Green Primary School and Children's Centre 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 and include Courtenay Drive, Kidmore End Road, Grove Road and Chalgrove Way.
9. Reference to the Tree Preservation Order (TPO) should be clear that ALL trees of whatever size or species are fully 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 to accommodate additional vehicles on busy days and prevent congestion on adjacent roads with the unacceptable associated added safety risks.
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 significantly 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. These assessments should be carried out by certified practitioners and peer reviewed to eliminate rogue findings.

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 *safe* vehicular access from suitable roads is in place."

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HUDSON, RACHEL

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**From:** Rachel Hudson  
**Sent:** 19 July 2019 16:22  
**To:** Planning Policy  
**Subject:** RGC

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

Please find detailed below my objections to the develop of RGC.

It is disappointing that the requirement for two new holes has been removed particularly since it is believed that Reading Golf Club has only made one attempt to buy new land in South Oxfordshire which was 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.

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. Being a resident of Kidmore End Road, the amount of traffic is already becoming unsustainable and posing a risk not only to local residents, children in the recreation ground but also to the environment.

Regards,

Rachel Hudson.

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HUSSEY, DAVID

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



Please return by Wednesday 24<sup>th</sup> July 2019 to: Planning Policy, Civic Offices,  
Bridge Street, Reading, RG1 2LU or email [planningpolicy@reading.gov.uk](mailto:planningpolicy@reading.gov.uk)

**PART A - YOUR DETAILS**

	Personal Details	Agent's Details <i>(if applicable)</i>
Title	Mr	
First Name	David	
Last Name	Hussey	
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?**

---

MM59 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	No
Is sound?	Yes	No <input checked="" type="checkbox"/>
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.**

---

1) As a Caversham resident for 40+ years and a member of RGC (the club) for 20 years, it is clear to me that the present board are determined to sell the clubs proprietary assets come what may.  
The Local Plan wording needs to be 100% watertight or the club will sell CA1b and maybe the rest of our land and walk away from the rest of its responsibilities. It is encouraging that a legal agreement is required before development takes place. It is necessary that this agreement is made with the existing owners/developers and will still apply to subsequent owners/developers of our land following any sale.

2) The modified proposals contain a lot of "should" s  
Quite clearly the potential developer will ignore all these, just as other developers have done in the past in Reading.  
I propose the word "should" is replaced with the word "shall", "will" or "must" in all this section.

---

*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.**

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*Please continue on another sheet if necessary*

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

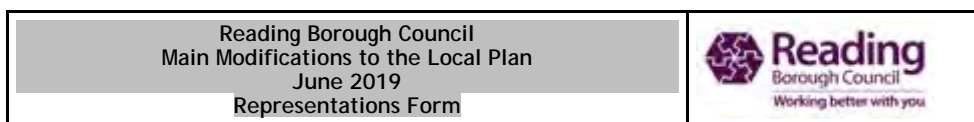
Please keep me informed of the progress of this Local Plan:

Please keep me informed of all planning policy matters:

HUSSEY, SUSAN

From: [Sue Hussey](#)  
 To: [Planning Policy](#)  
 Subject: Main Modifications to Local Plan  
 Date: 24 July 2019 15:51:54  
 Attachments: [pastedGraphic.png](#)

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Please return by Wednesday 24<sup>th</sup> July 2019 to: Planning Policy, Civic Offices, Bridge Street, Reading, RG1 2LU or email [planningpolicy@reading.gov.uk](mailto:planningpolicy@reading.gov.uk)

**PART A - YOUR DETAILS**

	Personal Details	Agent's Details <i>(if applicable)</i>
Title	Mrs	
First Name	Susan	
Last Name	Hussey	
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)

<b>B1. To which Main Modification does this representation relate?</b>
MM59, 199-200, CA1b

<b>B2. Do you consider that the Local Plan as changed by the Main Modification(s):</b> (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		No	
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**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 wording in paragraph 8.3.2 should be strengthened.

*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.**

"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."

I believe the above wording should read as follows:

"Residential development on the part of the Reading Golf Club site identified as CA1b **shall be solely** dependent on 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 **shall** 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 **shall be entered into** to ensure that the golf function is retained, and development for residential **shall** not take place until a **suitable** replacement clubhouse, **including changing facilities, bar and parking**, is provided and vehicular access from suitable roads is in place.

*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:	<input checked="" type="checkbox"/>
Please keep me informed of all planning policy matters:	<input type="checkbox"/>

HUTT, KEITH



**From:** [Keith Hutt](#)  
**To:** [Burr, Sarah](#); [martin brommell](#)  
**Subject:** Dangerous Road/ Hewett Avenue  
**Date:** 20 June 2019 18:50:19  
**Attachments:** [image1.jpeg](#)  
[image2.jpeg](#)  
[image3.jpeg](#)

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

Good afternoon Sarah .

This was Sunday afternoon at MPF

Football, very dangerous no traffic control in place and no respect for local people how would like this out side you home .

And this will be the norm once you give excess to the park from Hewett Avenue .

Strongly opposed the local plan





HYLTON, SHEILA

---

**From:** Sheila Hylton  
**Sent:** 24 July 2019 15:11  
**To:** Planning Policy  
**Subject:** Reading Golf Club

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

I am sending my comments in email form as I could not access the form provided.

This representation relates to MM 59

I consider the Local Plan as changed by main modifications is not sound.

B3 I generally support the modifications proposed by KEG but would particularly endorse their comments on CA1b 3 and 11.

B4 See B3

Please keep me informed of the progress of this local plan.

Mrs Sheila Hylton

Retired

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ILSLEY, SANDRA

**From:** [REDACTED]  
**To:** [Planning Policy](#)  
**Subject:** "Reading Borough Council – Local Plan Main Modifications - Ref. Policy CA1b  
**Date:** 20 July 2019 11:48:46

---

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

Dear Sirs

I am writing to raise my concerns and objections to the redevelopment of Reading Golf Course reference above. I live in [REDACTED].


1. I do not believe that the infrastructure in Emmer Green can cope with this redevelopment. I use the bus regularly for work and in the Winter particularly whether the 23 or 24 on occasions it has taken 45 mins to get to work due to the traffic. This development is only going to increase the volume of traffic. I have concerns about access in Kidmore End Road which is only narrow, also children walk and cycle to Emmer Green school along Grove Road where one side the pavement is narrow and the increase in cars from such a development is a concern.
2. The health centre and school would not be able to cope without a new facility being built within the development.
3. What is the definition of club house on a 9 hole course golf course. Is this to be a permanent structure. How will a 9 hole golf course work is it to be member based or public.
4. Access from Kidmore End Road onto the main Peppard Road is narrow and is already busy and difficult to get out onto the main road.
5. The noise the development will cause for months to the local residents who want to enjoy their homes ie sit in the garden in the summer.
6. The heavy works traffic that would be needed whilst building the development, how will the roads, surrounding area cope with this.

Sandra Ilsley

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JACKSON, MR J AND MRS C



Reading Borough Council  
Planning Policy Team  
Bridge Street  
Reading  
by e-mail

Dear Sirs

RBC – Local Plan Modification – Ref Policy CA1b

We are writing with reference to the revised wording of this application. We believe that as it stands it is not sufficiently binding & clear, and leaves scope for ambiguity. We have already expressed our concerns regarding the development and the extent to which the area is unable to adequately absorb further dwellings. Amending the wording of CA1b will go some way to alleviating these concerns. Required changes are as follows.

1. There should be an explicit statement that Reading Golf Club must provide 2 new holes. The removal of this requirement contravenes Policy RL6.
2. In view of the pressure on health services in Emmer Green, the reference to healthcare provision should be amended to explicitly state that the new provision should be appropriate for use by General Practitioners and associated medical infrastructure.
3. Traffic flow particularly along Kidmore End Road with its use, and the adjacent footpath, by children going to the recreation ground, and an aged population from the Lyefield Court retirement complex, remains a concern. The policy should require a statement as to how these dangers must be mitigated.
4. Since the air pollution and traffic assessments were carried out in 2015, traffic flow has increased. A new assessment is required and its findings taken in to consideration in CA1b.
5. Reference to Tree Preservation should explicitly state that ALL trees should be preserved.
6. The future provision of golf on the remainder of the site should be qualified by 'to include a permanent family friendly golf offering on land within Reading Borough and a permanent nine-hole course within South Oxfordshire as proposed in the Reading Golf Club/Wates submission'.
7. The word 'entire' should be added to the phrase 'on the remainder of the golf club site' would be beneficial.
8. The provision of onsite open space requires a statement explicitly stipulating its size.
9. The original submission for CA1b was for 90-130 dwellings. The requirement for a New Clubhouse and Healthcare facilities both with appropriately sized car parks requires this number of dwellings to be reduced.

We hope that you will accept these as sensible provisions and will act accordingly.

Yours faithfully

Mr M Jackson  
Mrs C Jackson

JONES, NICK

**From:** [Nick Jones](#)  
**To:** [Planning Policy](#)  
**Subject:** Local plan modifications consultation  
**Date:** 22 July 2019 22:22:22

---

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

**Nick Jones**

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

**Re:** *Reading Borough Council – Local Plan Main Modifications, June 2019*

Thank you for the opportunity to feedback on the plan. My comments are focused on the potential development of Reading Golf Club land in Emmer Green. And, how the modifications to CA1b, as you term it.

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. In particular its relation to the current boundaries and margins of the site. The margins are home to established trees, hedging, and shrub planting that contribute visually and acts a boundary markers, privacy belts and visual barriers.

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. In addition, the club sits on a popular route for cyclists entering and exiting Reading while trying to avoid the busier main roads.

8. The paragraph dealing with mitigation of the impact on the highways should give a clear indication of what measures would be acceptable. Token gestures will not deal with the road safety issues. For example, segregated cycle lanes rather than a lick of paint on a narrow pavement.

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. See point 6 also

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.

Thanks for providing the opportunity to feedback

Yours sincerely

Nick Jones

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JONES, RICHARD

---

**From:** Richard Jones  
**Sent:** 18 July 2019 12:33  
**To:** Planning Policy  
**Subject:** Comments on CA1b, proposed development of Reading Golf Club, Emmer Green.

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

For the attention of the Planning Policy Team: Comments on the Soundness of the Reading Borough Local Plan, Consultation on Main Modifications, June 2019 for section CA1b.

1. The revised plan has deleted the requirement for “additional land in South Oxfordshire being secured for replacement holes”. As a result, if the housing development goes ahead, the remaining land is insufficient to support an 18 hole golf course and “future provision of golf on the remainder of the site” will be limited to a 9 hole course with remaining 7 holes having no planned use; is this in contravention Policy RL6?
2. The requirement for a new clubhouse will need to be defined in greater detail. I doubt that the 9 hole golf course will be a “club” with members, it is more likely to be a place where people turn up to pay and play. Therefore, the “clubhouse” could turn out to be a small, minimum cost facility just for the collection of money from those who turn up to play. If it is to be something larger with toilets and catering facilities and be open to members of the public as well as those coming to play golf i.e. a community meeting place then this needs to be made clear by providing more detail in CA1b.
3. The healthcare facility mentioned in the opening paragraph should also be defined in greater detail in CA1b to indicate the size and scale of what is expected. The healthcare facility should be included in the site plan and work started before any new houses are built.
4. Road safety in the vicinity of the CA1b site is of paramount importance and the risk of accidents and injury, particularly to younger children is of serious concern especially during the construction phase when a large number of heavily loaded lorries will be using either Kidmore End Road or Courtney Drive to get to the site. Both of these roads are narrow with many parked cars and are busy with pedestrians, especially children, walking or cycling to and from Highdown Secondary School and Emmer Green Primary School.
5. There is a Tree Preservation Order on all of the trees on the site and a plan of the site showing the location of all of the existing trees should be produced before any plan is developed for the location of the new houses.
6. The site plan should also include sufficient parking spaces for the clubhouse and the healthcare centre as well as the dedicated access road to these facilities such that the traffic using them does not need to go through the housing estate.
7. The proposed development should also be clear on how the boundaries of the whole of the remaining Golf Club will be maintained and the whole of the site kept secure.
8. 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. Are there any plans to repeat the air pollution assessments especially during the morning and evening rush hour periods?

Thank you.

Richard Jones.

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JOSIF, ANDREAS

---

**From:** Andreas Josif  
**Sent:** 16 July 2019 08:32  
**To:** Planning Policy  
**Subject:** Reading Borough Plan Consultation ( Amendments)

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

Dear Sir

I would refer to the above and would make the following comments in respect of CA1b.

1 I am concerned that the existing club house will be replaced with a temporary structure such as a portacabin. It would therefore be prudent in my view that the wording be enhanced to make it clear that any replacement needs to be a permanent structure similar to what is there at the moment with the same facilities as a minimum.

2 The requirement to replace the 2 holes being used for development seems to have been removed; this is a retrograde step in my view, as it degrades the existing golfing facilities and should therefore be reinstated.

3 More houses in the Emmer Green area will put even more stain on Emmer Green Surgery which is already struggling as a result of other surgeries closing. As such the wording for a new healthcare provision should be enhanced to make sure it includes a doctors surgery.

On this subject I would also suggest that the Inspectors revised paragraph ref 8.3.2., be enhanced to read “the development for residential will not take place until the replacement clubhouse and healthcare facility are provided.”

Too often in the past Developers have promised facilities, that for various reasons have not been built, to the detriment of local people.

4 As a local resident I am also concerned about the security of the site once the golf club has moved. I would therefore like to see a legal requirement that they maintain all the boundaries and provide security to protect the whole of the remaining Golf Club.

5 The requirement to provided a green link is welcome but the size of the area should be clearly defined.

6 Another 100 or so houses will have an impact on roads in the area, the requirement to mitigate the impact in the report is a bit woolly and there should be examples of what the council is looking for in the submission to avoid future disputes.

Regards  
Andreas Josif

Sent from my iPad

KING, GILLIAN AND DENIS

**From:** [Gill King](#)  
**To:** [Planning Policy](#)  
**Subject:** Reading Borough Local Plan - Consultation of Main Modifications  
**Date:** 22 July 2019 20:14:10

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

Dear Sirs

There are several points regarding the CA1b which we would like you to consider . They are as follows -

1. All efforts should be made to obtain new land in South Oxfordshire to reinstate the course to a full 18 hole golf facility. This would open up the area for a permanent family course which would justify a club house with family facilities.
2. The new healthcare facility and golf club house must be given adequate vehicle parking which would surely reduce the number of dwelling proposed down from 90 - 130.
3. Particular attention should be paid to road safety round the Emmer Green playing field and children playground on Kidmore End Road.
4. It would seem that many of the trees have various marking on them. TPO should be on All trees irrespective of size or species.
5. It should be made clear that the provision for the healthcare centre and indeed club house are all of a permanent nature and not a stepping stone for future planning.

We would like to thank you for giving us the opportunity to express our concerns regarding the area we have live in for the last 40 years.

Kind Regards

Gillian and Denis King

LANG, GRAEME

---

**From:** Graeme Lang  
**Sent:** 03 July 2019 09:57  
**To:** Planning Policy  
**Subject:** Reading Local Plan, Policy CA1b

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

Below are my comments.

- 1 I believe Reading Golf club should make further attempt to buy land for additional holes for any holes lost through development.
- 2 Heath care provision should be more specific and state the inclusion of full time G Ps and health service.
- 3 The new clubhouse should be permanent structure and be sympathetic to the surrounding land.
- 4 Road safety is a major concern round the area of the golf course access. Increased traffic will only exasperate the situation.
- 5 Parking spaces should be sufficient for both golf and health care facilities.
- 6 Air pollution monitoring should be carried out now and extrapolated for the proposed increase in traffic movements to ensure a safe environment.
- 7 With increase space required for club house and health facility the number of proposed dwellings should be reassessed and reduced.

Regards

G Lang.

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LAWSON, IAN

**From:** [Ian Lawson](#)  
**To:** [Planning Policy](#)  
**Subject:** RE: Objection to development of Reading Golf Course  
**Date:** 24 July 2019 23:39:51

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

Dear Sir

I wish to register my objection to the change of use of the Reading Golf Course to a housing development, on the site

I cite the following reasons

1. The site is an historical golf course held in trust by the members for their use and that of future users. Reading residents would be deprived of its use if it were destroyed.
2. The shareholding value bears little relationship to the perceived value of the land and shareholders are persuaded by non-resident members to give up their shareholding without full stakeholder agreement.
3. Emmer Green is already fully developed and has no space for the infrastructure needs to accommodate a large development on the site
4. Properties already situated in the environs would be blighted by a new development.
5. The development of the site is motivated by greed and is not in the interests of Reading residents.
6. The site contains many trees which are protected by TPO and would be lost if the site were developed
7. Reading would unnecessarily lose an important green amenity within its boundaries

Yours sincerely

Ian Lawson  
Major R'etd



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LAWSON-MUDGE, JANE

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**From:** Jane Lawson-Mudge  
**Sent:** 12 July 2019 14:55  
**To:** Planning Policy  
**Subject:** CA1b MM59Reading Golf Club Kidmore End Rd RG4

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

Dear Planning Office,

I appreciate the efforts that you have gone to, in considering the overwhelming public opinion in objection to the proposed development of Reading Golf Club and I now wish to express additional concerns and recommendations/wording in the following areas:

1. The removal of the requirement for 2 new holes on the grounds. I believe that insufficient evidence has been provided by the owners of the club to present evidence of attempts to secure any land beyond one attempt at a purchase in 2015. Not making provision for replacement land to support the 2 holes contravenes policy RL6
2. The requirement to provide a Clubhouse should be more specific- clarification to prevent the positioning of a temporary structure would ensure permanency and reflect genuine investment in the community and sporting/communal facilities.
3. Provision of golf on the remaining land should be a permanent one, both community and family inclusive on the land within South Oxfordshire as was proposed by Reading Golf Club in the Wates submission to the inspector
4. To avoid pockets of land being held back for future intended/alternate housing development, it would appease public concern if the word "ENTIRE" be an addition to the sentence: 'the remainder of the Golf Club site'.
5. In light of severe GP shortages and continued closure of practices, it is essential that Healthcare provision NOT be an empty promise. This should be qualified with clear indication of intended size and scale of provision and also confirmation that it will house General Practitioners and the associated infrastructure will support and sustain, not only the existing population but the increased population that comes with all housing developments.
6. I strongly welcome provision of open space to the community but this MUST be clearly defined and honoured. EG: Caversham Park Village is the prime example of open space being 'acquired' by residents and builders alike and green spaces fenced off and swallowed up.
7. Safe passages/pedestrian access and road safety around CA1b is essential in preventing 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 requires clarification: heavy work vehicles and increased traffic MUST be taken into account and addressed as a point of urgency. There is NO public footpath/pavement on the roads leading from Tanners Lane; Kidmore End in the direction of Emmer Green and the strategy to minimise impact on roads; verges; trees; hedges must be detailed.
9. TPO's should include ALL trees.....this is an ancient woodland and parkland the TPO should reflect this. Evidence of damage to trees and protected bluebells on the site of RGC being damaged/burnt has already been reported (awaiting investigation by Dominic Lamb). RGC are custodians of this site and this must be honoured by any prospective developer.
10. To prevent trespass (particularly in light of the recent damage caused by travellers illegally setting up site at both the recreation ground of Emmer Green and the land off Clayfied Copse), the legal

requirement to permanently maintain all boundaries and secure the site must be a condition and priority.

11. Parking spaces should be adequate to serve the provision of the Healthcare facility and spaces should include space for those with disabilities.
12. To ensure adequate space for parking at the new Clubhouse and Healthcare facility is sited within CA1b, the original submission for 90-130 dwellings should be reduced accordingly.
13. In excess of 100 homes have been built in Sonning Common within the last 12 months- air pollution and traffic assessments for CA1b carried out in 2015 are now out of date. Irrespective of cleaner fuels and electric cars, it has been identified in the news this week, that a major cause of air pollution is 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 increased dangerous emissions).

14.

I 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.

I 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.”*

Finally, I wish to elevate the RGC site as a CRITICAL green lung to Caversham; its community and the farther-reaching areas of Reading.

CURRENT BBC news: July 2019 reported the rate at which forests Worldwide are being felled and the scientific proof that trees are ESSENTIAL to the absorption of poisonous carbon pollutants.

This is a natural habitat on the brink of destruction. We, the voting public, need Inspectors and planning officers like yourselves, to have the courage to promote existing and adequate Brownfield sites and protect the GREEN sites as a matter of public health and ecological priority.

Respectfully,  
Jane Lawson-Mudge

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LAWSON-MUDGE, LUKE

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**From:** jane lawson  
**Sent:** 02 July 2019 08:23  
**To:** Planning Policy  
**Subject:** CA1b MM59 Reading Golf Club Kidmore End Rd Emmer Green RG4

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

Dear Planning Officers,

I wish to put on record that the comments and recommendations made below, fully express my opinion- should the proposed development on the Reading Golf Club site be approved.

I do not believe that there should be development of green spaces such as this- a critical green lung to protect our environment when brownfield sites are already identified for development but the below is the minimum consideration that should be taken into account if development is passed.

#### Comments and Main Change Recommendations

Referring to the modified CA1b wording:

1. 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.

I 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.

I 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.”

Luke Lawson-Mudge

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LUNN, SUE

---

**From:** Sue Lunn  
**Sent:** 17 July 2019 21:15  
**To:** Planning Policy  
**Subject:** Reading Local Plan, Policy CA1b

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

Below are my comments:

Planning Policy, Reading Borough Council re Reading Golf Course.

It is most important to replace land if 2 holes are lost on CA1b.

Any new clubhouse should be a permanent structure adjacent to and facing the remainder of the golf club land.

Future provision of golf on remaining land should include permanent family friendly golf on land within Reading Borough and a permanent 9 hole golf course within South Oxon.

New healthcare provision should house GP and associated medical structure.

Paramount importance is road safety services around Emmer Green Playing Fields and the Playground in Kidmore End Road.

Tree preservation order should be for ALL TREES whatever size or species.

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

Parking requirements are essential for new Healthcare Facility and new Golf Club house.

New Clubhouse and Healthcare facility with car parks must be within CA1b and the number of houses must therefore be reduced.

Air pollution assessments needed as Emmer Green and Caversham traffic has already increased significantly.

It is important that golf function is retained permanently and no development of houses, until new clubhouse, healthcare and adequate parking are provided.

From: Mrs S. Lunn,



MAPLETREE INVESTMENTS PTE LTD

18 July 2019

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

Dear Sir/Madam,

### **Representation on Behalf of Mapletree Investments Pte Ltd in Response to the Draft Local Plan Main Modifications Consultation**

We write on behalf of our client Green Park Reading No.1 LLP, the owner of Green Park Business Park, Reading. Green Park Reading No.1 LLP (GPR) is ultimately wholly owned by Mapletree Investments Pte Ltd (Mapletree). This response relates to the proposed Main Modifications issued following the Examination Hearings to the Submission Draft Local Plan which took place in September and October 2018.

#### **Consultation Response**

##### MM15 'Policy EM1: Provision of Employment Development'

GPR supports the principal of the proposed amendment Main Modification 15 Reading Borough Council (the Council) has made, which removes the requirement for affordable housing contributions to be made to mitigate employment development. However, MM15 does not go far enough to resolve our concerns.

As noted in the Inspector's Post Hearing Advice Note, Reading Borough Council has provided no evidence through the emerging Reading Local Plan process which robustly demonstrates the viability (and, therefore, appropriateness) of Policy EM1 as drafted. Paragraph 002 of the Planning Practice Guidance states that "*viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan*".

Green Park is a business park of regional significance which has created significant economic, social and environmental benefits and its success has made Reading a key location to work in the South East. As paragraph 80 of the NPPF states "*planning policies should help create the conditions in which businesses can invest, expand and adapt*". The policy as worded continues to place a viability burden on major future employment development proposals in the Borough at a time of prolonged economic uncertainty, which would have wider social, economic and environmental implications.

Whilst the Council has made amendments to respond to the Inspector's comments, no further viability evidence has been provided to demonstrate that the policy has been tested to justify the need for the provision of housing from employment development. The Council's commissioned viability testing report by

BPS focused on supporting Policy H3 only and the further update dated 7 November 2018 addresses affordable housing viability and not employment development mitigation.

The removal of the affordable housing contribution wording is now more onerous because the reference to the provision of housing infers that this should be market housing, which it is not GPR's or economic development's role to be providing. It is for the Council to ensure that adequate housing land is provided in order to address any imbalance. Fundamentally, the Plan has to meet the assessed housing and employment needs in the Borough and if this changes, the strategic planning policies should be reviewed.

Furthermore, as paragraph 4.1.50 of the draft Plan (as amended) explains, "*one possible way to mitigate these impacts is through maximising the potential of the existing population to fill jobs, through improving skills, changing working practices or providing childcare facilities. Therefore, such development should include mitigation commensurate with its impact on the demand for labour and skills*". The focus for mitigation should be around maximising the potential of the existing population and not taxing development which supports the economy.

Looking at the Policy EM1 wording in detail, Part b) requires employment development to mitigate its impacts on local housing. However, the draft Plan provides no definition of what local housing is. The policy, as it stand, creates uncertainty and would prove restrictive when considering the viability of any future employment development at Green Park, over and above that approved. This has been demonstrated in the delay to delivery of 400 Longwater Avenue, which was caused, in part, because of viability issues related to the need to contribute financially to affordable housing. Furthermore, the second part of b) "*which may be through the provision of additional residential*" is imprecise.

It should also be noted that in order to meet the requirements of Policy EM1 Part a) in so far as needing to demonstrate that development would not result in additional need for housing can only be accurately defined at the latter stages of development when it is clear who the occupier will be. Currently, 400 Longwater Avenue is being developed on a speculative basis with no occupier lined up. Without this, it is difficult to assess where employees may live and the effects on the local housing market and economy, which is not an effective policy.

#### MM5 'Policy CC9 – Securing Infrastructure'

In amending Policy EM1, we note the Council has also made amendments to Policy CC9. However, although all references to affordable housing have been removed in this policy, it is now unconnected to Policy EM1 in respect of infrastructure provision and mitigation. It is, therefore, unclear what the justification for the references to housing in Policy EM1 now relate to. As the PPG on Viability, Para 001 states, policy requirements related to contributions should be informed by evidence of infrastructure and affordable housing need.

As paragraph 4.1.50 of the draft Plan states, one possible way to mitigate these impacts is through maximising the potential of the existing population to fill jobs, through improving skills, changing working practices or providing childcare facilities. The reference to affordable housing is now removed.

#### **Next Steps**

In summary, GPR welcomes the publication of the Inspector's Main Modifications to the draft Plan which sets a direction of travel in policy terms for Reading until 2036, however, additional consideration is required to make the Plan sound, specifically in relation to Policy EM1.

We look forward to receiving confirmation of receipt of these representations and request to be kept informed on progress of the draft Local Plan's adoption.

Yours sincerely



**Caroline McDade**  
For Deloitte LLP

MATTHEW, ANDREW

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



Please return by Wednesday 24<sup>th</sup> July 2019 to: Planning Policy, Civic Offices, Bridge Street, Reading, RG1 2LU or email [planningpolicy@reading.gov.uk](mailto:planningpolicy@reading.gov.uk)

**PART A - YOUR DETAILS**

	Personal Details	Agent's Details <i>(if applicable)</i>
Title	Mr	
First Name	Andrew	
Last Name	Matthew	
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?**

Modified CA1b wording -MM59

**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

Fulfil 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.

---

The Plan is not sound for the following reasons.

- 1) It is unclear that the items listed: housing, small golf course, parking, healthcare, public open space and related infrastructure will fit on the space or what amount of space will be allocated to each. It is easy to imagine token compliance with the unprofitable elements.
- 2) A critical issue for local residents, current and future, is adequate infrastructure provision. Only roads, water and waste water are mentioned. What about all the other utilities and requirements on how the development will avoid negative effects on current residents and the adequacy of future provision. The plan asserts things, for example mitigate impact on Kidmore End Rd and Tanners Lane, without constraining or suggesting how. The relevant sections of these roads are poorly maintained, single track and presumably controlled by South Oxfordshire.
- 3) An aspect that is completely missing is about constraints on the building phase to be carried through in to any application for detailed planning permission. It is absolutely vital for reasons of road safety, maintaining emergency, refuse, delivery and bus services, and general local amenity that all loading, unloading, queueing, builders/tradesmen parking etc is provided for on the site from day one. Under NO circumstances should the minor residential roads such as Lyefield Court, Tanners lane, Eric Avenue, etc be used for access or parking. The Kidmore End Road should be kept clear at all times. The current carpark and clubhouse area is adequate to allow this.
- 4) The Plan should require that any development retains the period cottages on the corner of Lyefield Court/Kidmore End road. This will aid maintenance of the look and feel of the area and reduce disruption to adjacent 60+ residents for whom Lyefield Court is the only access to their properties.
- 5) All the additional points below: a) 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. b)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” c) 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” d) Addition of the word “entire” to the phrase “on the remainder of the entire Golf Club site” would be beneficial. e) 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.” f) The onsite provision of open space is also welcomed but size of the area should be clearly defined. g) 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. h) Reference to the Tree Preservation Order (TPO) should be clear that ALL trees of whatever size or species are protected by the TPO. i) A legal requirement to maintain permanently all boundaries and the complete security of the whole of the remaining Golf Club land must be required. j)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. k) 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. l) 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.

*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.**

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1. A new paragraph should be inserted to address the additional concerns in my comments at B3 above (Sub paras 1-5)
2. In respect of the comments B3 Sub para 5 above addressing the current wording, the current wording should be amended 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."

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:

X

Please keep me informed of all planning policy matters:

X

MCKAY SECURITIES PLC

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

**By email only**  
**planningpolicy@reading.gov.uk**  
let.005.GD.RE.02230043

23 July 2019

Dear Sir / Madam

## **REPRESENTATION TO THE READING LOCAL PLAN MAIN MODIFICATION CONSULTATION**

On behalf of our client, McKay Securities PLC, we submit representations to the Reading Borough Local Plan Main Modifications consultation. Our client is the freehold owner of three commercial properties in B1(a) office use located at: 9 Greyfriars Road, 20-30 Greyfriars Road and Great Brigham's Mead, 1-9 Vastern Road.

These representations are made in respect of the following main modifications:

- MM5 (CC9 and 4.1.50);
- MM11 (4.2.67- 4.2.68);
- MM15 (EM1, 4.3.6 and 4.3.7);
- MM16 (EM3 and 4.3.13); and
- MM40 (CR11g).

### Main Modification MM5

We strongly support the removal of reference within Policy CC9 to employment development providing mitigation measures in line with its impacts on the demand for housing (including affordable housing).

This modification is required to prevent this policy being expressed in an unnecessarily restrictive way which will hold back and prevent the provision of new employment floorspace. This is unnecessarily restrictive because paragraph 80 of the NPPF places significant weight on the need to support economic growth and productivity. Matters to do with infrastructure, services, resources and so on, are best dealt with through pooled CIL contributions, and it is through these, rather than planning policy, that resources identified in the policy should be recouped. Without this proposed modification, Policy CC9 is not positively prepared and would conflict with other Local Plan policies which seek to encourage new employment floorspace as well as guidance within the NPPF and PPG.

The proposed modification to delete reference to monitoring costs is also supported. This is better dealt with on a case-by-case basis and controlled by a legal agreement.

#### Main Modification MM11

The additional clarity within paragraph 4.2.68 regarding alternative off-site provision of trees is welcomed. It is important to recognise that sustainable development can take place on a site which does not allow for the protection or re-provision of all existing trees. In addition, if the policy is flexible it will be easier for applicants to demonstrate net gains in biodiversity.

However, the main modification should be amended further in order to be more effective, and should be amended as follows:

~~Off-site tree provision will be appropriate in some cases~~ where it has been demonstrated that acceptable development cannot provide an appropriate level of mitigation planting (where trees are to be removed including in some cases TPO trees) and/or new planting within the site. This will be of particular importance where such sites are within or on priority tree planting areas/routes, as defined in the Tree Strategy.

This is an important clarification as it is not always possible to retain all trees within the site's red line boundary when delivering sustainable development and appropriate offsite contribution which adequately provides mitigation against tree loss should be accepted on more constrained sites such as town centre sites. This offsite provision can deliver equal or better environmental quality within the same area whilst also facilitating sustainable growth.

#### Main Modification MM15

We strongly support the Inspector's findings within the Post-Hearing Advice (EI014) that there is no evidence demonstrating that the requirement for employment development to contribute to affordable housing, has been robustly tested through the viability assessment for the RLP and therefore it is not justified. Without this justification, the policy as drafted is unsound as it does not seek to meet a sufficiently evidenced objectively assessed need for affordable housing.

However, proposed main modification MM15 does not go far enough to reflect the Inspectors findings. Instead, the following should be removed, in its entirety, from Policy EM1.

~~Development that would exceed the levels of employment development set out in this policy, after existing permissions and allocations are accounted for, 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, either which may be through the provision of additional residential or through contributions to affordable housing.~~

Without this modification, this policy will remain unduly onerous as it would make it

harder for a competitive town centre to emerge and will impact upon the viability of providing new employment space. Therefore, the policy does not accord with NPPF paragraph 85 which requires planning policies to be positive and promote competitive town centres. As such the proposed policy is not consistent with national policy and is unsound.

New office floorspace should be supported in the town centres to achieve this NPPF aim and it is the Council's responsibility to provide policies which encourage residential development on identified and appropriate sites which are consistent with National Planning Policy.

Furthermore, the Submission Draft of the Local Plan (March 2018) specifically highlighted that within the centre of Reading "over the last two decades, there has been a trend for older office buildings to be converted into flats, which has accelerated since 2013 due to new permitted development rights" (paragraph 5.1.6). This is clear acknowledgement that office provision is suffering from permitted development rights in the town centre and further office development should not be discouraged by onerous requirements.

The Plan also directs new office provision to the most sustainable locations within the town centre. These locations have excellent road, bus and rail connections. Therefore, additional office space in these locations will not necessarily generate any additional demand for housing within Reading and in many cases will replace existing buildings and jobs. Many employees will travel from outside of the Borough of Reading for work and as drafted this policy does not take this into account.

#### Main Modification MM16

We are concerned with the proposed addition to paragraph 4.3.13. Defining long term vacancy for employment sites as five years or more has the potential to seriously impact upon the health and diversity of the town centre and Core Employment Areas. There can be serious and significant change to the local, regional and national economic situations within a five-year period and requiring this time frame will prevent the market being able to respond to changes in the shorter term. It would be more appropriate and better reflect national policy trends for long-term vacancy to be defined as longer than two years.

This level of inflexibility is in contrast to paragraph 4.3.12 which recognises that there is a need for a certain degree of flexibility with existing employment land to allow an appropriate balance of uses to develop in the right locations.

#### Main Modification MM40

We object to the change in allocation from residential and some small-scale office and leisure use to only complementary offices. This is not justified as the allocation is also within the Office Core as defined on the emerging proposals map. The Office Core is where major office development is directed under policy CR1. As drafted, this allocation conflicts with other policy aims within the Local Plan.

Furthermore, the Riverside Major Opportunity Area (MOA) should be extended to the west to include the sustainably located Great Brigham's Mead site at 1-9 Vastern Road. This is an existing major office location which can be extended or redeveloped to provide additional office floorspace without resulting in any increase in demand on services and infrastructure.

The low rise-residential area adjacent to Great Brigham's Mead is already bordered by part of the proposed Riverside MOA and therefore including the Great Brigham's Mead site within the Riverside MOA would not present new problems or difficulties relative to the existing relationships in the area. The Great Brigham's Mead site provides an opportunity for optimised development within the MOA which would contribute to the aims of Policy CR11.

### **Conclusions**

We trust that you will take our client's comments into consideration when examining the Reading Borough Local Plan. We wish to be kept informed about the progression of the Local Plan, but in the meantime, please do not hesitate to contact me if you have any queries.

Yours faithfully

A large black rectangular redaction box covering the signature area.

Greg Dowden

MILLIGAN, DES

**From:** [Des Milligan](#)  
**To:** [Planning Policy](#)  
**Subject:** Reading Borough Council - Local Plan Main Modifications - Ref. Policy CA1b  
**Date:** 21 July 2019 09:00:35

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

Dear Sir

I have read the proposed modifications to the Local Plan and would like to comment on its 'Soundness' in respect of two issues in particular: -

1. The stipulation of providing a 'Health Care Facility'.

I have three children who are qualified doctors, so I have a particular interest in this area. I believe the plan should be quite prescriptive and clearly specify the scale and size of such a facility. My own practice, Sonning Common Health Centre, has 12 doctors and over 30 ancillary staff. I suggest that your plan identifies the size of a building that is fit for such a purpose and has sufficient parking for both patients and staff. My worry is that a developer will try to downsize such a facility, making it potentially unviable, unless there are clear obligations in the plan.

2. Tree Preservation Orders

I wrote to the Council some month ago about the need to preserve trees in this beautiful area of parkland and am gratified that TPO's were granted. I would urge that the plan specifies that **no** trees can be destroyed in the development of the site. We know that recent environmental reports have urged the government to plant many more trees, so we should not be in the business of cutting any down. The developer should be forced to build around them.

Thank you for taking my suggestions into consideration.

Regards

Des Milligan

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MORGAN, IAN

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**From:** Ian Morgan  
**Sent:** 19 July 2019 16:08  
**To:** Planning Policy  
**Subject:** Planning Consultation for RGC Ca1b

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

The PDF wasn't editable, so I've put my responses here inline. If this isn't an acceptable format please contact me and I can fill out the PDF instead by hand.

**PART A - Your details:**

Title: Dr  
Name: Ian Morgan  
Job Title/ Organisation:  
Address:  
Tel:  
Email:

**PART B - Your Representation:**

**B1. To which main modification does this representation relate?**

Soundness of CA1b proposal

**B2.**

Is legally compliant? (Unsure)

Is sound? (No)

Fulfills the duty to cooperate? (No)

**B3/B4**

**Legal Compliance/ Soundness:**

- It is a requirement to retain sporting facilities in the local area, however CA1b removes the ability to play a 'full' round of golf. There has been no attempt to secure further land around the course apart from one single email sent in 2015, with a one line reply from the land owner! This doesn't seem like due diligence has occurred, and feels like a disingenuous attempt by RGC to intentionally run down the golf facilities while paying lip service to the requirements. Further attempts should be made to identify expansion for the golf course, rather than accepting that the course is 'land-locked'. It feels like the council has submitted to lobbying from RGC on this point, as this requirement was in the original proposal.
- The requirement for health facilities should be strongly worded, including requirements for appropriate parking, access and staffing. Local surgeries have recently closed in Caversham.
- Traffic assessments should be carried out, and these should be historical in nature (can be obtained from O2 for example to identify annual traffic levels). This should also be considered when considering the density of the housing on CA1b, in terms of how many cars will be introduced.

I also fully support the points made by KEG, included below.

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.

I also strongly agree with the following;

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.”

### Duty to cooperate

- The newly elected LibDem council in Oxfordshire have announced that they are re-opening their draft plan for changes, so I do not see how Reading Borough have managed to cooperate with this new plan in mind (as it has not yet been completed).

### Points for the record

- In general, I am against any development on the site, however would support limited development if it makes the club's future sustainable. However, I also believe that RGC are operating in bad faith,

and will shortly look to submit a development proposal for the entirety of the golf course (at least, the land within the Reading boundary), which they have very clearly stated in a recent Henley Standard article, making this consultation void.

- Children centres on the Caversham side of the river have all now closed, resulting in additional traffic over the bridges where previously it was possible to walk.
- With the amount of development in Reading that is currently happening, I find it hard to believe that there is any requirement for additional housing in the area.

Kind regards

Ian Morgan.

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MORGAN, SHEN

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



Please return by Wednesday 24<sup>th</sup> July 2019 to: Planning Policy, Civic Offices,  
 Bridge Street, Reading, RG1 2LU or email [planningpolicy@reading.gov.uk](mailto:planningpolicy@reading.gov.uk)

**PART A - YOUR DETAILS**

	Personal Details	Agent's Details <i>(if applicable)</i>
Title	Mrs	
First Name	Shen	
Last Name	Morgan	
Job Title <i>(if applicable)</i>	Chartered Quantity Surveyor	
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?**

Soundness of CA1b proposal
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**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 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.**

<p>1. CA1b removes the ability to play a 'full' round of golf and no attempt to secure further land around the course. There should have identify expansion for the golf course and encourage the use of golf course.</p> <p>2. There should have more local facilities available</p> <p>3. There should have traffic assessment to be carried out based on the density of the housing on CA1b.</p> <p>I am strongly support KEG points made below:</p> <p>1. 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”</p> <p>2. 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”</p> <p>3. Addition of the word “entire” to the phrase “on the remainder of the entire Golf Club site” would be beneficial.</p> <p>4. 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.”</p> <p>5. The onsite provision of open space is also welcomed but size of the area should be clearly defined.</p> <p>6. 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.</p> <p>7. Reference to the Tree Preservation Order (TPO) should be clear that ALL trees of whatever size or species are protected by the TPO.</p> <p>8. A legal requirement to maintain permanently all boundaries and the complete security of the whole of the remaining Golf Club land must be required.</p>
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*Please continue on another sheet if necessary*

10. 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.

**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.**

I am against the development on the current greenfield site with the lack of local facilities (and the closure of the facilities recently - healthcare and children centre) as well as increase the traffic over the bridges.  
With the amount of development in Reading that is currently happening, I think North of Reading is over-populated and unsuitable for further development.

*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:



MORLEY, BRIONY

**From:**  
**To:** [Planning Policy](#)  
**Subject:** RBC Local Plan Main Modification - Reading Golf Club CA1b  
**Date:** 23 July 2019 19:21:02

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

To whom it may concern this is my comments on the above

I am very concerned about the future of the golf course as it would seem unfortunate that Reading Golf Club have not pursued any options to acquire land for two new golf holes for around five years. It's been suggested that the wording should include a permanent family friendly golf offering on the land within the Reading Borough and a permanent nine hold course on the land within South Oxfordshire.

We live on the course and are greatly concerned about the boundaries of CA1b are preserved and also that the TPO's are enforced. I have heard that developers just ignore these and cut the trees down without permission. It needs to be clear that all trees are protected.

I have other major concerns regarding the road safety in the area. There will undoubtedly be a lot of disruption to the access roads during the building process and I am worried that the car park for the new golf clubhouse and the new healthcare facility will not be large enough and will spill out into the surrounding residential roads. Traffic in the area has already increased recently especially with new housing developments in Sonning Common. I've been told that it is over 4 years since a review of air pollution and traffic flow has been done.

For the sake of clarity the word "entire" in the phrase "on the remainder of the entire Golf Club site" is necessary.

Kind Regards  
Briony Morley

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MORLEY, DAVID

**From:** [David Morley](#)  
**To:** [Planning Policy](#)  
**Subject:** RBC - Local Plan Main Modification - Reading Golf Club - CA1b  
**Date:** 20 July 2019 08:59:00

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

To whom it may concern – please find below my comment concerning the Local Plan Main Modification – Reading Golf Club – CA1b

- The future provision of golf on the remaining land should be qualified by the following wording “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 a previous submission from Reading Golf Club and the developer at that time in a submission to the Inspector”
- I have a major concern about road safety in the area of the CA1b site and it is something that needs addressing. I feel that road access to CA1b both as a development and importantly during the development/build process needs to be looked at in detail. Kidmore End Road and Courtenay Drive will be the access roads, and this is a major concern in general but especially for all those residents in that area. Parking at all times (during the build and when completed) must be confined to within the area of CB1b and must be enforced rigidly. Likewise, ALL parking for the proposed Surgery and the new clubhouse must be contained within CA1b
- I feel that for the sake of clarity the word “entire” in the phrase “on the remainder of the entire Golf Club site” is necessary.
- It is odd that the requirement for two new holes has been removed particularly. From my knowledge, Reading Golf Club has only made one attempt to buy new land in South Oxfordshire back in 2015. Does the removal of the two new holes lost through development on CA1b be in contravention of Policy RL6.
- 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 a new healthcare facility to house General Practitioners and the necessary associated medical infrastructure.”
- I feel that the whole subject of Air pollution and traffic flow for CA1b and the surrounding area needs to be reviewed. I believe that it’s now over 4 years since this was last reviewed. In general traffic in Emmer Green and Caversham has increased a lot especially with the construction of over 100 new homes in Sonning Common within the last 12 months.
- Tree Preservation Order currently in place - it must be made clear ALL trees of whatever size or species are protected by the TPO.
- It must be a legal requirement to maintain permanently all boundaries and the complete security of the whole of the remaining Golf Club.

Best regards  
David Morley

MORLEY, PHILIP

**From:**  
**To:** [Planning Policy](#)  
**Subject:** Fwd: RBC - Local Plan Main Modification - Reading Golf Club - CA1b  
**Date:** 23 July 2019 08:22:28

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

**Subject:** RBC - Local Plan Main Modification - Reading Golf Club - CA1b

To whom it may concern – please find below my comment concerning the Local Plan Main Modification – Reading Golf Club – CA1b

- I feel that the whole subject of air pollution and traffic flow for CA1b and the surrounding area needs to be reviewed. I believe that it's now over 4 years since this was last reviewed. In general traffic in Emmer Green and Caversham has increased a lot especially with the construction of over 100 new homes in Sonning Common within the last 12 months.
- I have a major concern about road safety in the area of the CA1b site and it is something that needs addressing. I feel that road access to CA1b both as a development and importantly during the development/build process needs to be looked at in detail. Kidmore End Road and Courtenay Drive will be the access roads, and this is a major concern in general but especially for all those residents in that area. Parking at all times (during the build and when completed) must be confined to within the area of CA1b and must be enforced rigidly. Likewise, ALL parking for the proposed Surgery and the new clubhouse must be contained within CA1b.
- The future provision of golf on the remaining land should be qualified by the following wording “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 a previous submission from Reading Golf Club and the developer at that time in a submission to the Inspector”
- I feel that for the sake of clarity the word “entire” in the phrase “on the remainder of the entire Golf Club site” is necessary.
- It is odd that the requirement for two new holes has been removed particularly. From my knowledge, Reading Golf Club has only made one attempt to buy new land in South Oxfordshire back in 2015. Does the removal of the two new holes lost through development on CA1b be in contravention of Policy RL6.

- 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 a new healthcare facility to house General Practitioners and the necessary associated medical infrastructure.”
- Tree Preservation Order currently in place - it must be made clear ALL trees of whatever size or species are protected by the TPO.
- It must be a legal requirement to maintain permanently all boundaries and the complete security of the whole of the remaining Golf Club.

Philip Morley

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MUDGE, PW



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**From:** philip  
**Sent:** 14 July 2019 14:21  
**To:** Planning Policy  
**Subject:** CA1b MM59 Reading Golf Club Kidmore End Rd RG4

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

Thank you for your considerations of the objections to RGC's proposals to development.

Please place on record my continued concerns and the request for inclusion:

1. The removal of the requirement for land for 2 holes . In face of insufficient attempt to secure land by RGC, I believe that not including the requirement for land to support the aforesaid 2 holes, contravenes policy RL6
- 2 The replacement Clubhouse should be a permanent structure (size indicated); functions should not be of inferior build or reduced usage and should serve the family-inclusive/friendly golf offering .
- 3.Ensure the provision of the new golf offering, be a permanemt and future investment to serve the community and add sporting facility for all abilities.
- 4.Identify that the entire remaining site be used for the use of a sporting facility for the community and not for future in-fill development
- 5.Show means by which a GP and healthcare service is to be provided. This is of huge public concern as the entire community has already been severely impacted by the shortage of GP services. Increased development further exacerbates this.
- 6.Clearly define the size of the promised green spaces to be accessible to the community and how this will be accessed e.g.additional pathways surrounding the existing site. Identify and protect the remaining area as an essential GREEN LUNG for Emmer Green and the surrounding areas of Reading.
- 7.Demonstrate how approach access to the site around CA1b will be made safe in an area that is in close proximity to playgrounds/playing field (Kidmore Rd is effectively a one lane rd opposite the parks due to on-road resident parking.
- 8.TPO's should take into account that this is a ancient woodland ie ALL trees that make up this established and ancient habitat should be protected.
- 9.The securing of the site to prevent illegal access; vandalism; occupation; burning. The site is already being used for the burning and damage to trees and flowerbeds has already been identified.
- 10.Ensure the number of parking spaces and cycle parking sited within the CA1b will be adequate to serve the Healthcare facility and the Clubhouse facility and that the proposed 90-130 dwellings are reduced meet this requirement.
- 11.Bring up to date traffic air pollution and traffic assessments. More than 100 homes have been built in Sonning Common and the surrounding areas since the 2015 findings and these records do not reflect current levels.

Sincerely,  
PW Mudge

MUSTILL, RICHARD

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



Please return by Wednesday 24<sup>th</sup> July 2019 to: Planning Policy, Civic Offices,  
 Bridge Street, Reading, RG1 2LU or email [planningpolicy@reading.gov.uk](mailto:planningpolicy@reading.gov.uk)

**PART A - YOUR DETAILS**

**Personal Details**

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

Title	MR	
First Name	RICHARD	
Last Name	MUSTILL	
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		
E-mail	[REDACTED]	

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

**B1. To which Main Modification does this representation relate?**

Policy CA 1b

**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.**

Not clear how <sup>increased</sup> traffic will be catered for, including additional parking.

Not clear in the scale of new General Practice Surgery to be provided.

*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.**

A clear plan showing how traffic will be managed throughout Kinross Green area in the future. Also taking account of other intended developments in the area and increased traffic from Sonning Common.

Details of how many additional GPs + what facilities to be available at the new healthcare centre.

*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:

## NATIONAL GRID

Reading Borough Council  
Civic Offices  
Bridge Street  
Reading  
RG1 2LU

Lucy Bartley  
Consultant Town Planner

Tel: 01926 439116  
[n.grid@woodplc.com](mailto:n.grid@woodplc.com)

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

10 July 2019

Dear Sir / Madam

**Reading Borough Council: Local Plan Main Modifications  
SUBMISSION ON BEHALF OF NATIONAL GRID**

National Grid has appointed Wood to review and respond to development plan consultations on its behalf.

We have reviewed the above consultation document and can confirm that National Grid has no comments to make in response to this consultation.

**Further Advice**

National Grid is happy to provide advice and guidance to the Council concerning our networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets. Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect our infrastructure. We would be grateful if you could add our details shown below to your consultation database:

Lucy Bartley  
Consultant Town Planner

[n.grid@woodplc.com](mailto:n.grid@woodplc.com)

Wood E&I Solutions UK Ltd  
Nicholls House  
Homer Close  
Leamington Spa  
Warwickshire  
CV34 6TT

Spencer Jefferies  
Development Liaison Officer, National Grid

[box.landandacquisitions@nationalgrid.com](mailto:box.landandacquisitions@nationalgrid.com)

National Grid House  
Warwick Technology Park  
Gallows Hill  
Warwick  
Warwickshire  
CV34 6DA



Yours faithfully

[via email]

**Lucy Bartley**  
**Consultant Town Planner**

cc. Spencer Jefferies, National Grid



## NATURAL ENGLAND

Date: 24 July 2019  
Our ref: 285310  
Your ref: Reading Borough Local Plan - Main Modifications



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

**BY EMAIL ONLY**

Customer Services  
Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

T 0300 060 3900

Dear Sir/Madam,

**Planning consultation: Reading Borough Local Plan - Main Modifications CONSULTATION REQUEST**

Thank you for your consultation on the above dated 12 June 2019 which was received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Following the Main Modifications consultation, Natural England is satisfied that areas within our remit are appropriately considered. We note that the Reading Borough is within 5-7km of Thames Basin Heaths Special Protection Area. Therefore, a Habitat Regulations Assessment (HRA) may be required for individual applications within this area.

Should the proposal change, please consult us again.

If you have any queries relating to the advice in this letter please contact me on 020802 61443.

Yours sincerely

Lauren Schofield  
Adviser  
Sustainable Development  
Thames Team

NEO, C

---

**From:** Bert Neo  
**Sent:** 19 July 2019 15:52  
**To:** Planning Policy  
**Subject:** Reading Local Plan, policy CA1b

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

Dear Sir/Madam,

As a local resident, I would like to add my comments as follows.

The sale of the first two holes by Reading Golf Club for housing development has reduce our 'green lungs' capacity and also increase pressure on our already overstretched infrastructure which includes the provision of medical facilities. Reading Borough Council must ensure that measures be taken to reduce the impact of this housing development.

Firstly it should ensure that the stipulated medical facility must be a properly constructed building and suitably equipped for doctors and nurses to treat patients. Secondly, again the club house must be a proper construct and to a standard comparable with the one it replaced. Our fear is that the developers will put up a large wooden shed for the medical facility and a metal shipping container for the clubhouse.

As to the land of the remaining 16 holes, RBC should ensure that this area is adequately secured and maintained. TPOs for the trees should be rigidly observed.

RBC should also agree the standard of the golf facility being provided. This will ensure that the families and local community will enjoy and support it. If the golf facility is provided just as a token and not looked after, it will soon be left 'in rack and ruin'. People will turn away and the golf facility will fold. This outcome might be what some parties desire.

The roads around Emmer Green, especially around the rush hours are already congested and we do not have enough schools or surgeries as it is. Any new housing development should not add to the concerns of the local residents.

Yours sincerely

C Neo

NEO, HJ

**From:** [Heather Neo](#)  
**To:** [Planning Policy](#)  
**Subject:** Response to new consultation on part of Reading Golf Club, CA1b, Main Modification MM59  
**Date:** 22 July 2019 13:24:36

---

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

Dear Sir/Madam

I am writing to respond to the reworded entry for CA1b regarding the soundness of the plan. As a local resident I feel very strongly about the impact any development on Reading Golf Course will have on my local area. I consider it crucial, therefore, that the wording on CA1b is totally clear and unambiguous.

The new clubhouse should be defined as “a permanent building similar in style and character to the current clubhouse, providing the same facilities and of an appropriate size for the new golf provision”.

The land remaining should include “permanent family-friendly golf provision on the land within Reading Borough and a permanent nine-hole golf course on the land within South Oxfordshire, as proposed in the Reading Golf Club/Waters submission to the Inspector”.

Sufficient car parking spaces need to be provided for the new Healthcare provision and new Golf clubhouse within CA1b. This would mean the number of dwellings originally included in the submission for CA1b (90-130 dwellings) should be reduced.

Explicit clarification needs to be made on what measures are proposed to deal with the extra traffic this development will generate. Also, what road safety measures are proposed, in particular for the young children in Emmer Green Playing Fields and the park nearby in Kidmore End Road?

I am also concerned that we have not had any air pollution tests since 2015. The volume of traffic around Emmer Green and Caversham has grown considerably since then, with over 100 new homes being built in nearby Sonning Common. The negative impact of pollution on the health of our community is of major importance.

With regards,

Mrs H J Neo

Sent from my iPad

NUTLEY, JIM

---

**From:** jim nutley  
**Sent:** 18 July 2019 11:08  
**To:** Planning Policy  
**Cc:**  
**Subject:** PROPOSED DEVELOPMENT READING GOLF CLUB /INCREASED RECREATIONAL USE OF GRAVEL HILL

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

Dear Sir/Madam , My name is James Nutley and I live in [REDACTED] . Several years ago my wife Margaret and I campaigned for the closure of Gravel Hill at the junction with Kidmore Rd , which thankfully resulted in the effective pedestrianisation of the hill and a huge increase in amenity use by local residents . When we came here 18 years ago you literally took your life in your hands negotiating the single lane hill ,with steep banks and no footpaths -However eventually the massive lorries that frequently got lost down here began to dwindle as their Satnavs updated and showed no through road !

As a direct result of the brave action by the local authority , the recreational use by local residents has spiralled , what used to be 10s of passers by is now counted in the hundreds in the course of a day . Indeed on a sunny day from dawn to dusk , you will find scores of dog walkers, recreational runners /cyclists,mums with children making their way to the park and equally the many school pupils that make their way to Highdown , having found a safe haven from the hideous traffic that blights the town generally .

As I mentioned in my previous mails , I am a keen amateur naturalist , and the decrease in traffic has also encouraged a surge in wildlife locally ,in my garden that sides onto the lane , we have had 47 species of bird , in excess of 10 indigenous mammals ,a good pollution of frogs/newts [global warming permitted] and many infrequent butterfly and dragonfly species .

It would be real shame to see this haven for local people to be obliterated by a new development proposed mainly by a group of avaricious individuals purely looking to fill their pockets at to the detriment of all the existing community !

I hope these environmental issues are taken fully into account when making your final decision , and I realise that because of local boundary issues the final decision is not fully in your hands , but as an Emmer Green resident who can track back his roots 5 generations to the village I would hate to see the area completely subsumed by the sprawl of the greater Reading conurbation , a fate that has already eradicated many of the other local hamlets!

I hope this mail reaches you in the spirit it leaves me , in the hope that a few of my local memories remain intact ...Jim NutleySent from [Mail](#) for Windows 10

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



ORR, CLIVE

**From:** [Clive Orr](#)  
**To:** [Planning Policy](#)  
**Subject:** Re. Consultation on Part of Reading Golf Club,  
**Date:** 20 June 2019 19:02:50

---

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

Dear Sir,

With regard to the above I wish to submit the following:

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 would 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."

Regards

Clive Orr

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

OXFORDSHIRE COUNTY COUNCIL

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



Please return by Wednesday 24<sup>th</sup> July 2019 to: Planning Policy, Civic Offices,  
Bridge Street, Reading, RG1 2LU or email [planningpolicy@reading.gov.uk](mailto:planningpolicy@reading.gov.uk)

**PART A - YOUR DETAILS**

	Personal Details	Agent's Details <i>(if applicable)</i>
Title	Mr	
First Name	John	
Last Name	Disley	
Job Title <i>(if applicable)</i>	Infrastructure Strategy and Policy Manager	
Organisation <i>(if applicable)</i>	Oxfordshire County Council	
Address 1	County Hall	
Address 2	New Road	
Address 3		
Town	Oxford	
Post Code	OX1 1ND	
Telephone	07767 006742	
E-mail	PlanninginOxfordshire@oxfordshire.gov.uk	

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

**B1. To which Main Modification does this representation relate?**

1. MM26 - 3 <sup>rd</sup> Reading River Crossing
--

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

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

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

<ol style="list-style-type: none"><li>1. Oxfordshire County Council raised concerns on the Pre-Submission Local Plan regarding a 3<sup>rd</sup> Reading River Crossing.</li><li>2. Reading Borough Council's proposals for a 3<sup>rd</sup> Reading River Crossing will require joint working and agreement with Oxfordshire County Council. The vast majority of the proposed River Crossing would be within South Oxfordshire and part is in Wokingham Borough. Joint working arrangements are ongoing, but we raised concerns in our Pre-Submission response about funding studies and about the scope of the project. The scope would need to consider the impact on Oxfordshire's roads and therefore any costing of the project would need to include the cost of works to improve or add to the road network in Oxfordshire. The 3<sup>rd</sup> Reading River Crossing and mitigation measures must not be considered as separate, all studies should consider this holistically, both in terms of efficacy and cost. Only when the entire scope is assessed will the full benefits and costs of the proposal be apparent.</li><li>3. Reading Borough Council agreed in their March 2018 consultation response to make changes about costs in the Infrastructure Delivery Plan but responded that mitigation within South Oxfordshire could be considered within the development management process which we think is incorrect as our concern is about the scope of the project as a whole.</li><li>4. MM26 amends Policy TR2 to make it clear that the transport priorities listed will only be safeguarded where necessary. Policy TR2 will therefore be as follows with the addition of the underlined words: TR2: MAJOR TRANSPORT PROJECTS Priority will be given to the implementation of the major transport projects identified</li></ol>
--

in the Local Transport Plan (or any successor document) and other identified major transport projects. Land required for these projects will be safeguarded where necessary. These will include:

- Mass Rapid Transit
- Park and Ride sites
- Green Park station and interchange
- Reading West station upgrade
- Cow Lane bridges
- Crossing of the River Thames
- National Cycle Network Route 422
- Development of high-quality bus services

5. We consider that safeguarding within South Oxfordshire is not currently required given that the scope of the project and required mitigation in South Oxfordshire is not yet known and therefore support the modification.

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

None

**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:

Yes

Please keep me informed of all planning policy matters:

Yes

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

**B1. To which Main Modification does this representation relate?**

2. MM26 and MM27 - Park & Ride Sites
--------------------------------------

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

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

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

<ol style="list-style-type: none"><li>1. Oxfordshire County Council objected to the Pre-Submission Plan which suggests Park &amp; Ride sites potentially being within South Oxfordshire. We also queried the costs which were underestimated.</li><li>2. MM26 amends Policy TR2 to make it clear that the transport priorities listed will only be safeguarded where necessary. Policy TR2 will therefore be as follows with the addition of the underlined words: TR2: MAJOR TRANSPORT PROJECTS Priority will be given to the implementation of the major transport projects identified in the Local Transport Plan (or any successor document) and other identified major transport projects. Land required for these projects will be safeguarded <u>where necessary</u>. These will include:<ul style="list-style-type: none"><li>• Mass Rapid Transit</li><li>• Park and Ride sites</li><li>• Green Park station and interchange</li><li>• Reading West station upgrade</li><li>• Cow Lane bridges</li><li>• Crossing of the River Thames</li><li>• National Cycle Network Route 422</li><li>• Development of high-quality bus services</li></ul></li><li>3. We consider that safeguarding within South Oxfordshire is not necessary given that the need for Park &amp; Ride sites has not yet been established through studies. We therefore support MM26.</li><li>4. In its March 2018 statement of consultation, Reading Borough Council explained that their concept is to remove existing car trips from the heavily</li></ol>
--



congested highway network and referred to the agreed approach of working in partnership to seek investment to enhance inter-urban bus services, which would reduce the need for people to use Park & Ride. Further joint work is required to assess whether Park & Ride sites within South Oxfordshire are needed in the context of other enhanced bus services.

5. MM27 amends paragraph 4.5.8 with the underlined words as follows:

- Park and Ride: Despite recent new park and ride provision at Mere oak and Winnersh (both in Wokingham Borough), there is a continued need for new provision. Opportunities for new sites will therefore be sought, particularly on the corridors identified on figure 4.8. The constraints of the Borough mean that the sites are most likely to be in adjoining authorities, and the Council will continue to work with its neighbours to bring new facilities forward. A new park and ride is permitted at Thames Valley Park in Wokingham, and 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. Park and ride can complement existing bus services, including inter-urban buses, by supporting their use.

6. We support MM27 as it makes it clear that sites have not been identified in South Oxfordshire and that further work would be required for Reading District Council to progress this.

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

None

**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:

Yes

Please keep me informed of all planning policy matters:

Yes

PAGE, CAMERON

---

**From:** Cameron Page  
**Sent:** 16 July 2019 16:53  
**To:** Planning Policy  
**Subject:** Comments on Consultation ref. CA1b Reading Golf Club

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

From Cameron Page

I wanted to comment on the proposed changes to the wording of CA1b:-

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” should be required
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 the 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. This is especially the case given the prevalence of young people playing ball games in the park, the balls from which sometimes end up on the road to be chased by the young owner...
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 has 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 commensurately

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 would like to suggest the addition adding the wording in red underlined 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.”

Many thanks

Cameron Page

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

PAGE, ROB

## Burr, Sarah

---

**From:** Rob Page  
**Sent:** 15 July 2019 14:35  
**To:** Planning Policy  
**Subject:** Comments on Consultation ref. CA1b Reading GC

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

From Rob Page

I write regarding the proposed changes to the wording of CA1b:-

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” should be required
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 the 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. This is especially the case given the prevalence of young people playing ball games in the park, the balls from which sometimes end up on the road to be chased by the young owner...
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 has 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 commensurately
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 would like to suggest the addition adding the wording in red underlined 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."

Many thanks

Rob Page

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

PALARCZYK, RYSZARDA



---

**From:** Palarczyk  
**Sent:** 19 July 2019 15:01  
**To:** Planning Policy  
**Subject:** Reading Borough Council – Local Plan Main Modifications - Ref. Policy CA1b

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

Dear Sir/Madam

I am writing in regards to 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".

I and many residents are still very concerned about the proposed development. I would like to make the following points:

RBC have made it a requirement that a replacement clubhouse and healthcare facilities including suitable parking provision must be built within the confines of CA1b. In order to fulfil this criteria, I feel that the estimated number of dwellings (90-130) should necessarily be reduced. I am very concerned about the potential overspill of parking in streets surrounding the new development. Many households have two or more cars and yet new developments do not make sufficient provision for this. Does the number of proposed dwellings take into account the problems we already experience with cars being parked by commuters who then take the bus into town? Quite a number of residents, eg in Kidmore End Road have three or more cars and then park in surrounding roads, rather than on their own drives. This problem will inevitably escalate if the new development reaches the upper limit of proposed dwellings and their residents will be obliged to park in surrounding streets.

The latest document states "On-site public open space will be provided" but it does not define how much space will be provided. I think this needs to be clarified.

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". I feel it very important that this will be a permanent and properly maintained fixture. My fear is that if it is not made a condition that it will be a permanent fixture and if it closes, the land will become derelict and prone to vandalism.

Will not the proposed nine hole golf course on South Oxfordshire's land also require a clubhouse? I cannot imagine people just rolling up, and changing in the car park and post round have no shower, toilets or refreshment facilities. The clubhouse deemed to be in CA1b will be too far away to be meaningful.

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

With climate change being in everyone's mind, we have to be careful not to build over green land that is the lungs of Emmer Green. Our descendants won't thank us for tarmacking over green land which soaks up pollution.

I should be grateful if you could take my comments into account.

Yours sincerely

Mrs Ryszarda Palarczyk

PARRY, RICHARD

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



Please return by Wednesday 24<sup>th</sup> July 2019 to: Planning Policy, Civic Offices,  
 Bridge Street, Reading, RG1 2LU or email [planningpolicy@reading.gov.uk](mailto:planningpolicy@reading.gov.uk)

**PART A - YOUR DETAILS**

**Personal Details**

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

Title

MR.

First Name

RICHARD

Last Name

PARRY

Job Title (if applicable)

[REDACTED]

Organisation (if applicable)

MEMBER OF KEG  
 (SUPPORTER)

Address 1

[REDACTED]

Address 2

[REDACTED]

Address 3

[REDACTED]

Town

[REDACTED]

Post Code

[REDACTED]

Telephone

[REDACTED]

E-mail

[REDACTED]



**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.**

Re Reading Golf Club and plot CA26  
The original proposal put forward by RGC in 2018 included a commitment to providing a golf facility on the remainder of the land.  
I propose that RBC wording re CA26 should be amended to say "to include a permanent family friendly golf offering on the <sup>remaining</sup> land within RBC's jurisdiction and a permanent 9 hole golf course on the land in South Oxfordshire. - Thank you.

*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?**

CA16 Part of Reading Golf Course

**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 checked="" type="checkbox"/>	No	<input checked="" type="checkbox"/>
Fulfils the duty to co-operate?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

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

*Please continue on another sheet if necessary*

READING CONSERVATION AREA ADVISORY COMMITTEE



Reading Conservation Area Advisory Committee  
24 July 2019

FAO PLANNING POLICY

**NEW LOCAL PLAN – CONSULTATION ON MAIN MODIFICATIONS**

Reading Conservation Area Advisory Committee commented extensively on the draft New Local Plan and is pleased to have this opportunity to make representations on the main modifications.

1. We commend the updated wording and consequent improvement in the legal compliance and soundness of the policies in relation to heritage assets. In particular in relation those modifications itemised below:

B1 – MM6  
B2 – Yes, Yes, Yes  
B3 – n/a  
B4 – n/a  
B5 – Yes, Yes

B1 – MM7  
B2 – Yes, Yes, Yes  
B3 – n/a  
B4 – n/a  
B5 – Yes, Yes

B1 – MM32  
B2 – Yes, Yes, Yes  
B3 – n/a  
B4 – n/a  
B5 – Yes, Yes

B1 – MM34  
B2 – Yes, Yes, Yes  
B3 – n/a  
B4 – n/a  
B5 – Yes, Yes

2. In relation to the modifications below there is the potential to improve the soundness of the policies as they impact on heritage assets.

B1 – MM44

B2 – Yes, No, Yes

B3 – There may be some conflict here with the emerging potential of a theatre on the prison site (MM45) and whether it is appropriate to restrict a new theatre to the area of the Hexagon.

B4 - see above.

B5 – Yes, Yes

B1 – MM45

B2 – Yes, No, Yes

B3 – We feel that the policy should give stronger support for the potential cultural uses of the prison site such as an arts hub and/or theatre and consideration of what is emerging as a popular local preference for finding a future cultural use for the site.

B4 – see above

B5 – Yes, Yes

B1 – MM62

B2 – Yes, No, Yes

B3 – More explicit wording is required in relation to the retention of interior features of Caversham Park House.

B4 – Reword second para: Conversion of the house from offices to residential and/or a cultural, community or heritage use, or other suitable use compatible with its heritage, will be acceptable if it sustains the significance of the listed building, **including any important internal features and the building’s major internal spaces.”**

B5 – Yes, Yes

Yours sincerely

Evelyn Williams

Chair Reading CAAC

On behalf of Reading Conservation Area Advisory Committee

43 Milman Road

Reading

RG2 0AZ

[chair.readingcaac@gmail.com](mailto:chair.readingcaac@gmail.com)

07955 153824



RENDELL, PETER

**From:** [Peter Rendell](#)  
**To:** [Planning Policy](#)  
**Subject:** Reading Borough Council-Local Plan Main modifications-ref policy CA1B  
**Date:** 23 July 2019 16:57:39

---

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

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.

Regards  
Peter Rendell

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ROBERTS, SUSAN

---

**From:** Sue Roberts  
**Sent:** 19 July 2019 16:23  
**To:** Planning Policy  
**Subject:** READING BOROUGH COUNCIL - LOCAL PLAN MAIN MODIFICATIONS: REF POLICY CA1b

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

Dear Sirs

As a local resident I feel **very strongly** about the potential impact that any development on Reading Golf Course will have on the local area and my family's quality of life.

I therefore wish to submit the following comments and suggestions on the modified wording of Policy CA1b in the Local Plan as recommended by the Inspector earlier this year, which relate to the **SOUNDNESS** of the plan.

My personal details are as follows:

[REDACTED]

#### Comments and Main Change Recommendations

Referring to the modified CA1b wording:

1. It is **very disheartening** 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, 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 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 **must** be sufficient for the new Healthcare Facility and the new Golf Clubhouse. Emmer Green Surgery, for example, currently has 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 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**, and since that date, 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. I suggest adding the following in red italics below to the Inspectors' wording:

*“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.”*

Please keep me informed of the progress of this Local Plan and all related planning policy matters.

I look forward to hearing from you.

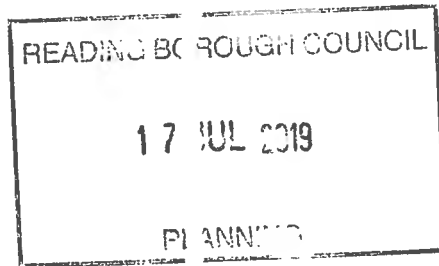
Regards

Susan Roberts

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

ROBSON, ELAINE

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



17<sup>th</sup> July 2019

Dear Mr Worringham,

**COMMENT ON MAIN MODIFICATIONS TO THE LOCAL PLAN**

My comment is related to

MM12 pp 57-58 4.2.79-82

From **page 82** I have consulted **footnote reference 55** (to be added to the present text)

This was published by the Institute of Air Quality Management (IAQM) in January 2017  
<http://www.iaqm.co.uk/text/guidance/air-quality-planning-guidance.pdf>

**Comment**

The IAQM has also published guidance on the assessment of dust and mineral dust and I suggest that a reference to one or both of the following titles should be included in Modifications to the Local Plan:

Guidance on the assessment of dust from demolition and construction 2014 Version 1.1

Guidance to the assessment of mineral dust impacts for planning May 2016 Version 1.1

Yours sincerely

A solid black rectangular redaction box covering the signature area.

PS In the new text my suggestions (of 28.1.2018) re EN15 Air Quality are included within broader perspectives but the additional reference(s) from IAQM would be useful.

Elaine Robson

A solid black rectangular redaction box covering contact information.



RODDA, MATT

**From:** [Matt Rodda MP](#)  
**To:** [enquiries\\_MP](#)  
**Cc:** [Crosbie, James](#)  
**Subject:** Reading Golf Course (Case Ref: MR12006)  
**Date:** 05 July 2019 14:54:46

---

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

Dear Team,

Please could you forward this email to Acting Assistant Director of Planning, Development and Regulatory Services James Crosbie.

I am writing to raise my concerns about the Reading Golf Course site, which is subject to public consultation. Please could you add my email and my previous related correspondence to this consultation.

I have the following concerns about the site:

1. Development of the site in general:

I am concerned that development of the Reading Golf Course site would not comply with the Reading Borough Local Plan. The site is on the edge of the Borough; it is currently used for leisure; and it is a valuable habitat for wildlife. Any development is likely to lead to more traffic and pollution in Caversham, Emmer Green and in Reading town centre, and to put further pressure on local services.

It is worth noting that a previous application was turned down by RBC Planning Committee on a number of grounds mentioned above, and the developer then lost at appeal. I believe this highlights the importance of the site and the need to protect it from development.

2. Size and number of homes on the site:

I am opposed to development of the site as mentioned above. If a smaller number of houses are given planning permission I hope that the impact of the development could be as limited as possible. Therefore I prefer any development to be a far smaller number of houses and that these should be suitable for purposes other than being larger executive style homes.

3. Preservation of nature:

In addition, I would ask that the maximum number of trees, shrubs, and wildlife habitat be protected on any development.

4. Leisure provision:

I would also like the site to continue to exist as a golf course, as this is a valuable sports facility for local people, particularly young people and families.

5. Transport:

It is also important that there is proper access to any golf course on the site and I would like to ensure that there is access to public transport.

I am grateful to local residents and Reading borough Council for their work on this important issue.

Yours sincerely,

Matt Rodda  
Member of Parliament for Reading East

01182062966  
mattroddampcasework@parliament.uk  
matt.rodga.mp@parliament.uk

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

## ROPEMAKER PROPERTIES

23<sup>rd</sup> July 2019

Planning Policy  
Reading Borough Council  
Civic Offices  
Bridge Street  
Reading  
RG1 2LU  
By email only to [planningpolicy@reading.gov.uk](mailto:planningpolicy@reading.gov.uk)

Thornbury House  
18 High Street  
Cheltenham  
GL50 1DZ

01242 230066  
[www.ridge.co.uk](http://www.ridge.co.uk)

Dear Sir/ Madam

## Representation on the Reading Borough Council Main Modifications Consultation

The opportunity to comment on the Main Modifications is welcomed and these comments are made on behalf of my client; Ropemaker Properties. As you will be aware, we have made representations throughout the Local Plan process and also attended the Examination in Public. More specifically on the main modifications, we would like to make the following comments.

### MM21: Policy H5: Housing Standards

Ropemaker Properties welcomes the flexibility of not being required to meet the nationally described space standards within the central area. It is however concerned about the requirement within the policy to be designed to meet zero carbon homes and accessibility requirements, particularly as this will take effect as soon as the plan is adopted.

Whilst the addition within the policy that "New build housing should be built to the following standards, unless it can be clearly demonstrated that this would render a development unviable:" is welcomed. It is considered that additional flexibility should be added into the policy, particularly in the early years of the plan given that zero carbon homes are still considered aspirational with many of the techniques/measures required not yet considered to be mainstream.

The viability study carried out by BPS as part of the Local Plan process, suggests that there is no additional cost to making homes zero carbon. However, this is not the case, and developers are currently experiencing a significant premium in making homes zero carbon, which is not reflected in the end value. It is appreciated that this is the council's aspiration, however it should be introduced over the course of the plan period.

The overly onerous requirements of this policy are noted within the supporting text which states that where homes are not designed to be carbon neutral "this will mean as a minimum a 35% improvement in the dwelling emission rate over the 2013 Building Regulations plus a contribution of £1,800 per tonne towards carbon offsetting within Reading (calculated as £60 per tonne over a 30 year period)." This, together with the requirements of affordable housing, CIL and other Section 106 Contributions means that developments, particularly those on brownfield sites in central Reading, are becoming increasingly unviable and viability arguments will delay housing delivery. This goes against government policy which seeks to make effective use of brownfield sites, particularly those which promote/allow for the use of sustainable modes of transport.

In case of M4(2) and M4(3) dwellings, it considered that by only relaxing these rules when a development is unviable is very rigid. It should be up to the applicant to demonstrate that a scheme is suitable given the site context, having regard to the requirements of policy H5 whilst not having to adhere to all elements rigidly. This would help to ensure a high-quality design, which is promoted within section 12 of the NPPF and will help to optimise the potential of the site and ensure it complements its wider setting.

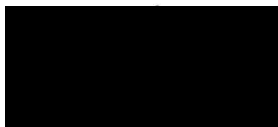
It is therefore the view of Ropemaker Properties that this policy is neither legally compliant or sound.

**MM36:** Policy CR10: Tall Buildings.

It is disappointing that no changes are proposed to the tall building areas boundaries, particularly when paragraph 118 of the NPPF emphasises the importance of making effective use of sites, including using the airspace above existing residential or commercial premises.

I trust these comments will be taken into account by the Inspector. If I can provide any clarification on the matters raised then please do not hesitate to contact me on the number at the head of this letter.

Yours faithfully



Emma Greening MRTPI  
Senior Planner  
For Ridge and Partners LLP

SCAMMELL, TOBY

**From:** [Toby](#)  
**To:** [Planning Policy](#)  
**Subject:** Proposed Development on Reading Golf Club/South Oxfordshire land.  
**Date:** 24 July 2019 22:13:02

---

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

Dear Sir/Madam,

I wish to register my concern that the proposed development on the above land would have a detrimental impact on the current, and future generations living in Emmer Green, Caversham, and Reading.

The traffic infrastructure is insufficient to allow cars and buses to move freely through Caversham- levels of pollution are already high, here- does RBC really want a series of legal challenges, similar to recent high-profile cases in London, where health events and even deaths have a demonstrable, causal link to uncontrolled traffic pollution, with the controlling local council liable?

Many other points have been made by a local group, and are summarised below:

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.

Many thanks for your consideration.

Best wishes

Toby Scammell

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SEGRO

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



Please return by Wednesday 24<sup>th</sup> July 2019 to: Planning Policy, Civic Offices,  
Bridge Street, Reading, RG1 2LU or email [planningpolicy@reading.gov.uk](mailto:planningpolicy@reading.gov.uk)

**PART A - YOUR DETAILS**

**Personal Details**

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

<b>Title</b>		Mr
<b>First Name</b>		Ben
<b>Last Name</b>		Taylor
<b>Job Title</b> <i>(if applicable)</i>		Planning Director
<b>Organisation</b> <i>(if applicable)</i>	SEGRO (C/o Agent)	Barton Willmore
<b>Address 1</b>		9th Floor Bank House
<b>Address 2</b>		8 Cherry Street
<b>Address 3</b>		
<b>Town</b>		Birmingham
<b>Post Code</b>		B2 5AL
<b>Telephone</b>		01217116375
<b>E-mail</b>		ed.pigott@bartonwillmore.co.uk

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

**B1. To which Main Modification does this representation relate?**

Please see attached letter

**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.**

Please see attached letter

*Please continue on another sheet if necessary*

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

Please see attached letter

*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:

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

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

25189/A3/EP/BT/sw

23rd July 2019

Dear Sir/Madam,

**Reading Borough Council – Local Plan Main Modifications Consultation**

We write on behalf of SEGRO in respect of their land interests at Island Road, Reading, in connection with the above public consultation on the Main Modifications for the Local Plan following the Examination in Public (EiP) undertaken in September - October 2018.

Following the EiP, a number of modifications have been suggested by the Inspector to make the Plan sound and suitable for adoption. We welcome the Council's pro-active approach to development, as set out within the Plan, and comment on the various suggested modifications below, where relevant.

**MM3 & MM4**

We welcome the proposed changes which ensure that Policies CC3 (Adaptation to Climate Change) and CC4 (Decentralised Energy) are sufficiently flexible while still requiring investigation into the provision of measures to adapt to climate change. The additions to Policy CC4 (Decentralised Energy) provide certainty as to what is required as part of any planning application.

**MM5 & MM15**

Employment development is a much-needed part of the spatial strategy of the Borough and will provide the requisite jobs for new and existing residents within the area. We welcome the amendment to Policies CC9 (Securing Infrastructure) and EM1 (Provision of Employment Development) which removes the requirement for employment development to provide mitigation measures relating to demand for housing (including affordable housing), given this has not been sufficiently evidenced, through a thorough viability assessment, to show such a requirement would not adversely impact upon the viability of any future employment schemes. For clarity we would, however, suggest that the wording is revised as set out below:

**“...which may be through ~~the provision of~~ additional residential provision”.**

Further, we welcome the additional wording within Paragraph 4.3.7 which sets out that additional residential development would be a way to counteract the first caveat within Policy EM1 (provision of Employment Development) which prohibits further employment development beyond that set out within Policy EM1 if it would result in ‘additional need for local housing’ and is something which could stymie economic growth within the region.

Notwithstanding this, Paragraph 80 of the NPPF sets out that planning policies should help create the conditions in which businesses can invest, expand and adapt and significant weight should be placed on the need to support economic growth and productivity. We would therefore have concerns with this approach and question if this requirement could create a scenario that would stifle economic development if the Annual Monitoring Report (which will monitor the relationship between employment and housing provision) suggests that the employment ‘limit’ has been met. It is our view that the provision within the Plan should be viewed as a minimum as opposed to a ceiling in line with Paragraph 81d of the NPPF. It is noted that the gross employment land requirement for Reading is 73.3ha between 2013-2036<sup>1</sup> of which 52.6ha of the requirement is for industrial uses.

We would therefore suggest that the main modification is expanded to create more flexibility to allow for employment development within the region which will meet the aims of the NPPF.

#### MM52

Within our representations to the Pre-submission Plan in January 2018 we set out various modifications which would benefit the Plan. We welcome the modification which clarifies that developments can come forward separately while still ensuring satisfactory access arrangements will be provided. This will allow sufficient flexibility for the Site to come forward in either one or two phases reflecting the land ownership and discussions between the two parties.

It should be noted that we also support the change that has been made to Figure 6.2 relating to the nearby sensitive location and the acceptability of water features as requested in our previous representations.

Finally, we welcome the clarification relating to the buffer zone required from top of bank of the watercourse which will avoid any unneeded uncertainty in the future.

#### Sustainability Appraisal of Main Modifications

We also note the Council’s assessment of this main modification referenced about (MM3,4, 5, 15 & 52) and support their conclusions.

We trust that our comments will be given due consideration in progressing the Plan. Should you require any further information, please do not hesitate to contact me as per the details of this letter.

Yours faithfully,



**BEN TAYLOR**  
Planning Director  
Enc.

---

<sup>1</sup> Central Berkshire FEMA Economic Development Needs Assessment October 2016)

SGN AND DANESCROFT



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



Please return by Wednesday 24<sup>th</sup> July 2019 to: Planning Policy, Civic Offices,  
Bridge Street, Reading, RG1 2LU or email [planningpolicy@reading.gov.uk](mailto:planningpolicy@reading.gov.uk)

**PART A - YOUR DETAILS**

**Personal Details**

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

Title

--

Mrs

--

First Name

--

Karen

--

Last Name

--

Charles

--

Job Title (if applicable)

--

Director, Head of Boyer Wokingham

--

Organisation (if applicable)

SGN & Danescroft
------------------

Boyer

--

Address 2

--

Crowthorne House

--

Address 3

c/o Agent
-----------

Nine Mile Ride

--

Town

--

Wokingham

--

Post Code

--

RG40 3GZ

--

Telephone

--

01344 753165

--

E-mail

c/o Agent
-----------

karencharles@boyerplanning.co.uk

--

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

**B1. To which Main Modification does this representation relate?**

MM9
-----

**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"/>
Fulfils the duty to co-operate?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

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

<p>SGN and Danescroft support the proposed changes to Policy EN12, in particular where it clarifies that permission will only be withheld for development that negatively affects the sites with identified interest or fragments the overall network.</p>
--

*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.**

No changes proposed.

*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 24<sup>th</sup> July 2019 to: Planning Policy, Civic Offices,  
 Bridge Street, Reading, RG1 2LU or email [planningpolicy@reading.gov.uk](mailto:planningpolicy@reading.gov.uk)

**PART A - YOUR DETAILS**

**Personal Details**

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

**Title**

--

Mrs

Karen
-------

**First Name**

--

Charles

**Last Name**

--

Director, Head of Boyer Wokingham

**Job Title (if applicable)**

SGN & Danescroft
------------------

Boyer

**Organisation (if applicable)**

--

Crowthorne House

**Address 2**

c/o Agent
-----------

Nine Mile Ride

**Address 3**

--

**Town**

--

Wokingham

**Post Code**

--

RG40 3GZ

**Telephone**

c/o Agent
-----------

01344 753165

**E-mail**

c/o Agent
-----------

karencharles@boyerplanning.co.uk

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

**B1. To which Main Modification does this representation relate?**

MM18
------

**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.**

SGN and Danescroft support the proposed changes to Policy H2 in particular the additional text which recognises that residential development capacity figures within the site allocation policies will need to be addressed at application stage, including detailed design and layout, and may differ from the range set out in the allocation.

*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.**

No changes proposed.

*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  
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**PART A - YOUR DETAILS**

**Personal Details**

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

**Title**

--

Mrs

Karen

**First Name**

--

**Last Name**

--

Charles

**Job Title (if applicable)**

--

Director, Head of Boyer Wokingham

**Organisation (if applicable)**

SGN & Danescroft
------------------

Boyer

**Address 2**

--

Crowthorne House

**Address 3**

c/o Agent
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Nine Mile Ride

**Town**

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**Post Code**

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RG40 3GZ

**Telephone**

--

01344 753165

**E-mail**

c/o Agent
-----------

karencharles@boyerplanning.co.uk

c/o Agent
-----------

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

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

<p>SGN and Danescroft support the proposed changes to Policy CR13d, in particular the changes removing reference to the mouth of the River Kennet.</p> <p>SGN and Danescroft also support the revision to the wording to provide for a 10m set back from the top of the bank of the River to reflect its wildlife significance, rather than to provide a wildlife corridor in this area.</p> <p>However, SGN and Danescroft remain strongly of the view that the site's development capacity should be increased as the site has the potential to accommodate around 130 homes, rather than the 'potential 46-70' identified in the Policy. This is demonstrated through the current application ref. 190627FUL which proposes 130 homes.</p> <p>SGN and Danescroft note and support the additional text proposed by MM18 which clarifies that "residential development capacity figures within the site allocation policies are often based on these densities, but the capacity of each site will likewise depend on various factors that need to be addressed at application stage, including detailed design and layout, and may differ from the range set out in the allocation". By including an indicative capacity of 46-70 in Policy CR13d, this fails to make efficient use of brownfield land in accordance with the NPPF. SGN and Danescroft therefore further request that this indicative capacity is increased to ensure that any forthcoming development on the site recognises the potential of this sustainably located brownfield site to deliver more housing.</p>
--

*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.**

Policy CR13d should be amended as follows:

"...

Site size: 0.71ha      Indicative potential: 100 - 130 dwellings"

*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:



SH READING MASTER LLP

DP4815

24 July 2019

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

DP9 Ltd  
100 Pall Mall  
London SW1Y 5NQ

Registered No. 05092507

telephone 020 7004 1700

facsimile 020 7004 1790

[www.dp9.co.uk](http://www.dp9.co.uk)

Dear Sir/Madam,

## **READING BOROUGH LOCAL PLAN – CONSULTATION ON MAIN MODIFICATIONS JUNE 2019**

### **REPRESENTATIONS ON BEHALF OF SH READING MASTER LLP**

We write on behalf of our client, SH Reading Master LLP, in respect of the Station Hill site in central Reading. We welcome this opportunity to respond to the Main Modifications proposed on the Reading Borough Local Plan.

The Council will be aware of the planning history for the Station Hill site, and the recent resolution to grant two Section 73 applications and reserved matters for the southern part of the site. SH Reading Master LLP are currently in ongoing discussions with officers at the Council regarding the future phases on the northern part of the Site. These representations have been prepared regarding the consented position and emerging discussions on the northern part of the Site, to ensure the new Local Plan policies are compatible and provide flexibility for the future.

#### **MM4 – Policy CC4 Decentralised Energy**

We welcome the removal of the preference for CHP as the favoured decentralised energy source. However, we consider that it is prudent that Reading Borough Council provide an undated heat mapping study should be undertaken by RBC to establish the existing decentralised energy networks and any areas of opportunity (with existing centralised plant), so that future applicants can make the necessary investigations and capitalise on any opportunities to create future decentralised energy networks.



Paragraph 4.1.13 should be updated or deleted. The grid is de-carbonising and therefore electricity is a much cleaner fuel. A CHP unit uses a significant amount of fuel to produce electricity and as such it is no longer considered to be a low carbon technology. The CHP reference should also be removed from Paragraph 4.1.15.

The feasibility study referred to in Paragraph 4.1.18 should be updated to provide a map that identifies areas of opportunity.

#### MM20 – Policy H4 Build to Rent Schemes

SH Reading Master LLP supports the amendments to Policy H4.

#### MM39 – Policy CR11c Station Hill & Friars Walk

SH Reading Master LLP continues to support the allocation of the site for redevelopment. However, the proposed dwelling numbers have now been exceeded on the southern part of the Site. SH Reading Master LLP are presently discussing the northern part of the site including residential floorspace (C3, C2 and sui generis) and as such it is vital that the proposed dwelling numbers are not regarded as a cap.

In addition, we consider that the “(no significant net gain assumed)”, should be removed from the policy wording. The permissible uses within this allocation should be extended to include all town centre uses including hotel, leisure and retail at uncapped quantum.

#### **Concluding Remarks**

We trust that the above comments will be considered as part of the ongoing evolution of the Reading Local Plan.

Yours sincerely,

**DP9 LIMITED ON BEHALF OF SH READING MASTER LLP**

SMITH, BILL



**From:** [Bill Smith](#)  
**To:** [Planning Policy](#)  
**Subject:** Comments on Inspectors Amendments to the New Draft Local Plan.  
**Date:** 21 July 2019 17:33:47

---

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

Comments relate to CA1b

1. Reference is now made to an open space. This requirement must be clearly defined. We do not want a token gesture.

2. I am very concerned by the potential impact on the stretch of Kidmore End Road adjacent to the Childrens Playground from the certain increase in traffic resulting from any residential development. We simply cannot have any changes that would further endanger the safety of the children using this facility.

3. Regarding the Tree Preservation Orders it must be made clear that none of the current specimens can be put at risk by any earthworks proposed for the whole of CA1b.

Bill Smith

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SMITH, HARVEY

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



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 Bridge Street, Reading, RG1 2LU or email [planningpolicy@reading.gov.uk](mailto:planningpolicy@reading.gov.uk)

**PART A - YOUR DETAILS**

	Personal Details	Agent's Details <i>(if applicable)</i>
Title	Dr	
First Name	Harvey	
Last Name	Smith	
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 (Policy 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 checked="" type="checkbox"/>	No	<input type="checkbox"/>
Is sound?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
Fulfils the duty to co-operate?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

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

The modifications in MM59 are generally very sound and reflect the concerns raised in responses to the Submission Draft of the Local Plan, but there are some inconsistencies and omissions which need to be corrected:

- (1) The proposed additional paragraph 8.3.2 rightly states that the remaining land needs to be retained as a golf course "in line with the need to protect important sports and leisure facilities set out in Policy RL6." The proposed deletion in the first paragraph of the requirement for "additional land in South Oxfordshire being secured for replacement holes" is therefore inconsistent with the new 8.3.2, as the loss of two greens would clearly not protect the sports and leisure facility. To correct this inconsistency the reference to the replacement holes needs to be retained.
- (2) "On-site public open space will be provided" has been retained in the first paragraph, but, in order to avoid an insignificant piece of land being provided for this, to be sound the text should state that the space should be "appropriate to the size of the development".
- (3) The proposed additional paragraph 8.3.2 refers to "a replacement clubhouse" (correctly reflecting the condition at the beginning of the first paragraph). In order to avoid a developer simply bringing in a portacabin or similar and calling it a clubhouse, to be sound this phrase should be amended to "a permanent replacement clubhouse".
- (4) RBC declared a climate emergency on 26 February 2019 and is undergoing a consultation for a new Reading Climate Change Strategy, with one key theme

being Natural Environment. Policy CA1b is one of the very few sites in the Local Plan being considered for development which is greenfield, and the Local Plan's Strategy for Caversham and Emmer Green (Section 8.2) requires that development is "done in a way that prevents adverse effects on the existing areas", avoids "potential effects on landscape" (8.2.4) and takes into account the inadequacy of local infrastructure (8.2.5). To be sound, the proposed new paragraph 8.3.2 will therefore need to be especially protective of the site's environment and should include a condition that any development complies with Reading's Climate Change Strategy and enhances the Natural Environment.

*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.**

The following changes to MM59 will remove inconsistencies and make this part of the Plan sound.

(1) Retain (do not delete) the text "additional land in South Oxfordshire being secured for replacement holes". [See (1) above.]

(2) Change "On-site public open space will be provided" to "On-site public open space will be provided appropriate to the size of the development." [See (2) above.]

(3) In the proposed new paragraph 8.3.2 delete "a replacement clubhouse" and replace with "a permanent replacement clubhouse". [See (3) above.]

(4) Add a further sentence to the proposed new paragraph 8.3.2: "Development will need to be fully compliant with Reading's Third Climate Change Strategy and enhance the natural environment."

*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:

SMITH, PETER AND LINDA

---

**From:** Peter & Linda Smith  
**Sent:** 12 July 2019 19:06  
**To:** Planning Policy  
**Subject:** Re Proposal to build on the existing Reading Golf Club site

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

Sir/Madam

We write to express our concern about the latest and continuing proposals to utilise the Reading Golf Club site for residential housing.

As we have previously written to express our objections to this proposal (see our e-mail of November 4 2018 to Mr Worringham) we do not repeat our objections (as you have requested) but stress new or modified issues relating to this proposal:

1. The latest proposals appear to plan for a different number/average foot size of dwellings to be constructed. This would alter the tone/tenor of the development in comparison to the original proposal and we would wish that there is clarity on the type of development now being proposed. (e.g. number of dwellings, type of dwellings, site density etc)
2. There is still NO detailed attention to the much increased traffic density implied on Kidmore End Road and other roads close by :
  - this would have significant impact on the dwellings on the road prior to reaching the Golf Club which have no garage/parking facility except for parking outside these properties, thereby creating what is in effect a "rolling" one way stretch of about 100 metres in both directions.:
  - this reduced amenity would impact on safe access/egress for the recreation area opposite to these houses used regularly by families and children playing alone.

We do however note that in the recent weeks there has been the temporary installation of what could be traffic sensors on Kidmore End Road and Grove Road which appeared to have the function of assessing traffic density on the road junction/road stretches in the vicinity.

This is a welcome intervention which could provide useful data on traffic issues close to the current Golf Club and recreation areas.

As this temporary installation has now ceased, it would be interesting to know what has been learnt.

3. We are aware that all trees on the Golf Course are subject to TPO's.  
If any planning permission, either limited or full is ultimately granted, we would expect full vigilance of any and all contractor activity to ensure that any "accidental" removal/lopping of protected trees does not occur in order to facilitate any implementation of the building proposals and to extend any building density achieved.
4. We note comments that the building works may encompass a new Doctor's surgery.  
The recent closure of a local surgery has added to pressure on facilities in the area and replacement would be welcome.  
However, please note that using Golf Club land to deliver a new surgery facility would require both a large car park (witness the parking facilities, always crowded and/over subscribed at Balmore Park Surgery on Hemdean Road and the current Emmer Green Surgery) and increase further the traffic density in the area especially along Kidmore End Road as patients attempt to access any new medical facility.  
The addition of such facilities requires careful planning and integration with all other elements of the plan.

5. There is still no mention of how the shortage of school places locally, especially at primary school level will be handled given the almost certain increase in demand following the building of such a substantial number of additional houses in this area.

Are we therefore to assume that existing schools will become more crowded and that catchment areas may be redrawn but only after permission has been given for this development?

This does not give any confidence of an integrated plan/policy that takes into account all the demands and requirements of local residents.

We still retain the strong objections expressed in our initial mail of 04/11/2018 to building on the Golf Club land and wish to add the above observations to our concerns.

Please ensure that all our objections are taken into account at relevant planning meetings and permission stages.

Yours sincerely

P A and L M Smith

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SPORT ENGLAND

---

**From:** Bob Sharples <Bob.Sharples@sportengland.org>  
**Sent:** 11 July 2019 09:05  
**To:** Planning Policy  
**Subject:** Main Modifications Reading Local Plan June 2019

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

Good morning,

Thank you for inviting Sport England to review the above document.

I would like to make the following comments/observations:

- MM5 - Sport England supports this modification and believes it to be sound.
- MM30 - Sport England supports this modification and believes it to be sound
- MM35 - Sport England supports this modification and believes it to be sound
- MM56 - Sport England supports this modification and believes it to be sound.
- MM59 - Sport England supports this modification and believes it to be sound.
- MM65 - Sport England supports this modification and believes it to be sound

Kind regards

Bob

**Bob Sharples** MRTPI RIBA  
Principal Planning Manager - South Team

**T:** 07830 315030  
**M:** 07830315030  
**F:** 01509 233 192  
**E:** [Bob.Sharples@sportengland.org](mailto:Bob.Sharples@sportengland.org)



We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our [website](#), and our Data Protection Officer can be contacted by emailing [Erin Stephens](#)

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SUN, HUALIN

---

**From:** Sunny  
**Sent:** 18 July 2019 12:56  
**To:** Planning Policy  
**Cc:**  
**Subject:** Reading Local Plan, Policy CA1b – comments about modifications

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

Dear RBC officer,

Hope this email finds you well.

I live in Emmer Green and am writing in response to 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” .

I’ d like to propose the following changes to the wording of the plan in order to ensure that CA1b is explicit and unambiguous as I am sure that RBC would be keen on avoiding any misunderstanding.

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.

In addition, I suggest to add the wording in red italics as below to the new paragraph (ref. 8.3.2) recommended by the Government Inspector.

“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.

Overall, I hope my above comments can be taken into consideration by the Planning Policy Team and look forward to seeing the improvement in the wording of the modified CA1b.

Thank you and kind regards,

Hualin Sun

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SURREY COUNTY COUNCIL

---

**From:** Maureen Prescott <maureen.prescott@surreycc.gov.uk> on behalf of Planning Consultations/EAI/SCC <planning.consultations@surreycc.gov.uk>  
**Sent:** 16 July 2019 13:09  
**To:** Planning Policy  
**Subject:** Reading Borough Local Plan – chance to comment on Main Modifications to the Local Plan

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

Dear Madam/Sir,

Thank you for consulting Surrey County Council on the Main Modifications. We do not have any comments on these.

Kind regards,

Maureen Prescott  
Spatial Planning and Policy Team  
Surrey County Council  
Tel: 020 8541 7412

\* \* \* \* \*

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TAGGART, RYAN

**From:** [Ryan Taggart](#)  
**To:** [Planning Policy](#)  
**Subject:** Response to the new consultation on Part of Reading Golf Club, CA1b, Main Modification MM59  
**Date:** 20 July 2019 09:26:25

---

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

**Response to 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".**

I am writing in response to the recent reworded plan for CA1b at Reading Golf Club.

Whilst it is clear that a majority of local residents are opposed to the plan to redevelop the land in stages to housing, it still seems that one way or another the people who stand to make money on the back of a unwanted and unwarranted development will manoeuvre their way through the objections made from the public and the Council.

The lack of interest in maintaining Golf at the site for the long term is demonstrated by the Reading Golf Clubs poor attempt to secure the land in order to deliver the two replacement holes as stipulated in policy RL6. And their unwillingness to take on new membership.

The required new club house should be a permanent structure and not a cheap 'shed' provided simply to bypass another planning requirement.

The provision of new healthcare facilities to balance any residential development should specify the need for the housing of new GPs surgery.

I would like to see more detail regarding the provision of road safety in relation to the proposed CA1b.

The submission of CA1b indicated 90-130 dwellings. This should be reviewed taking into account the continued requirement for parking at the NEW Golf club house (as the current car park will take approximately 100 cars) and also the provision for suitable car parking for a doctors surgery. Emmer Green Surgery currently has 27 spaces which is insufficient. Any new facility should take this into account and not give the space over to houses.

The reworded CA1b should specify the need for an up to date pollution and traffic assessment as the existing study is out of date by a number of years.

Also, any reference to the Tree Preservation Order should state specifically that ALL trees whatever age and type are covered.

Finally - I've been advised that any new consultations do not have to take into account previous concerns put forward regarding the proposed development. I therefore would like to reiterate my previous arguments:

***My email 21st October 2018.***

***Whilst it would be easy for me to sight the greed of existing Golf club members to make an easy penny once the proposal to sell up was put forward. (it's a farce to think that a club that claims it has a declining membership is refusing new full members so's not to dilute the payday pot for existing members) - It's not necessary when voicing opposition to the plans to sell off the site for development, for the simple reason that Reading has already identified the correct area for residential expansion.***

***I love living in Emmer Green, but admit that it is already at capacity regarding infrastructure for those people getting in and out of Reading on a daily basis. Geographically the possibility of improving the flow of people/traffic does not exist.***

***Park & Ride - Not possible due to the lack of space to provide dedicated bus lanes. Who would park their car only to sit in traffic on a bus.***

***Third Bridge - Not possible due to the lack of central government support and investment and the unwillingness of neighbouring counties to work together to solve the issue. If it was possible the A329 wouldn't finish at the business park.***

***Local Services - With Priory Road Doctors surgery closing this year we are not only struggling to provide simple services to the existing residents but would be mad to build more houses in large numbers without the confirmation of a new GPs practice.***

***Schools - We are lucky with schools in the area but are facing a real bottle neck when it comes to senior school age.***

***Reading Council it seems have already, sensibly identified the area close to the M4 as a more viable area to expand residential space. I am not against new housing. I'm personally very lucky but have a number of friends who are struggling to even get on the housing ladder which is often due to the lack of available affordable housing stock. I just want to see urban sprawl handled pragmatically and not fuelled by the greed of a few people. We need new houses, but in the right place and supported with the relevant infrastructure.***

***I trust that Reading will not allow the first stage of the golf club to be sold off. The agreement to take the money and improve the remaining site and facilities will obviously not be adhered to and the remainder of the site will eventually fall into the hands of developers. I trust that Reading will stick to their current more pragmatic residential expansion plans.***

Thank you. I trust that peoples valid concerns will be taken into account.

Ryan Taggart

Emmer Green Resident.

TEER, SIGI

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**From:** sigi.teer  
**Sent:** 04 July 2019 18:59  
**To:** Planning Policy  
**Subject:** Reading Borough Council Draft Local Plan - CA1b

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

Dear Sir/Madam,

I hereby would like to submit my comments on the modifications made by the Council and Government Inspector to CA1b in the Draft Local Plan.

I am welcoming some of the new wording but think certain aspects of the new wording should be made more stringent and clearer as I am afraid that any ambiguity in the wording might be exploited by the developer or the landowner.

*"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, being secured. On site facilities should be provided to mitigate impacts on community infrastructure, including for healthcare. On site public open space will be provided."*

It should make absolutely clear that the provision of golf should be on the whole of the remainder of the land in the Borough of Reading and South Oxfordshire. The provision should also be made permanent.

Reading Golf Club produced an 83 page report (EP043) , Appendix 4 shows what their plan for the rest of the land in both Reading and South Oxfordshire were. I am sure a feasibility study was undertaken before the report was compiled and submitted to the Government Inspector. If not, these were just empty words in order to secure CA1b to be included in the Local Planning as part 1 of the Master Plan.

The replacement Clubhouse should be defined more clearly. The Clubhouse must be of the same standard as the one which is currently there and offer facilities which will support golfing facilities/leisure facilities on a permanent basis.

A porterkabin or a small pavilion style clubhouse should not be acceptable. It needs to be a proper, permanent structure that at least provides the same facilities that the current clubhouse does.

Healthcare must be defined clearly. Does this mean a proper facility which provides General Practitioners and other medical and nursing staff?

This is important as building a surgery is not a problem. The real issue will be recruiting GPs and other primary care professionals.

*"Take measures to mitigate impacts on the highway network, particularly on Kidmore End road and Tanners Lane".*

The measure should be clearly defined.

Part of Kidmore End Road is virtually a one way road, with cars parked outside the terraced houses in Kidmore End Road and a playground opposite the terraced houses. It should be stipulated that the grass verge next to the playground must not be taken away as it provides an extra security buffer for children coming out of the playground which is already a busy road.

The safety of the residents and particularly young children must be of the utmost importance.

*"Include all parking requirements within the site to avoid exacerbating parking issues on existing streets"*

The exact amount of car parking spaces for the replacement clubhouse and the new health care facility should be clearly defined.

*"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 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 in place."*

The new paragraph from the Inspector should be tightened and it should include that the legal requirement is necessary to ensure that the golf function is retained on a permanent basis as well as the boundaries being maintained and secured on a permanent basis.

It should also state clearly that no development for residential will take place until a replacement clubhouse and healthcare facility with adequate parking for both is provided.

*"Avoid adverse effects on important trees including those protected by TPO"*

The trees on the Golf Course in Reading Borough have Tree Preservation Order on them and this applies to all trees of whatever size and species. This should be made clear.

The Golf Course acts as a green lung for Caversham and the adjacent area. Air pollution has worsened in Caversham in recent years and not been helped by housing developments in South Oxfordshire, in places such as Sonning Common, whose residents use their cars to get to Reading and the M4 via Emmer Green and Caversham.

Data collected by RBC states that air quality measurements at three locations in Caversham have exceeded the mean limit for the past nine years.

**The Draft Local Plan under EN15**, 4.2.74 confirms that "Air pollution can have serious effects on human health and environment".

4.2.76 states that DEFRA and the DfT produced a UK Plan for tackling roadside nitrogen dioxide concentrations in July 2018. Reading was identified as having roadside concentrations exceeding legal limits in 2017 -20 but dropping below legal limits from 2021.

It goes on to say that local monitoring (not used in the DEFRA model) indicates more areas of exceedance than modelled by DEFRA and that the rate of development in the Reading area was also something not taken into account.

Furthermore the Draft Local Plan does not state on what the Council's predictions are based.

I can only assume it must be the same data (traffic data from 2015) which was used as the baseline in the recent feasibility report published by the Council.

I have written to the Environment Health Officer for clarification on this and don't want to comment further on this subject.

However if the data used by the DEFRA model is really based on data from 2015 then it does not give a true picture of the situation and the air quality problems will last beyond 2021.

Please confirm receipt of this email.

Best regards

Sigi Teer

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TEER, TREVOR



---

**From:** Trevor Teer  
**Sent:** 01 July 2019 10:48  
**To:** Planning Policy  
**Subject:** Reading Borough Council Draft Local Plan - CA1b

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

Dear Sir/Madam,

I am writing to make comments on the modifications made to CA1b in the Draft Local Plan.

Firstly it is disappointing that since Reading Golf Club(RGC) have seemingly only made one attempt, over 4 years ago, to find extra land to build 2 new holes, this requirement has been dropped. To my mind the fact that RGC had only made a half hearted attempt several years ago makes CA1b undeliverable and is also in contravention of Policy RL6.

However I am pleased to see that other aspects of the wording of CA1b have been tightened up.

There are nonetheless a number of comments and recommendations I wish to make, to improve clarity even more and remove any ambiguity which the landowner/developer may wish to exploit.

1. It should be made clear what type of clubhouse should be erected. It should be a permanent structure, providing at the very least the same facilities and be of a similar style as the existing clubhouse
2. Reference to the future provision of golf should have the word “permanent” added to both of the golf offerings ( family friendly golf on Reading Borough land and a 9 hole golf course on SODC land) that were proposed by RGC/Wates in their submission to the Government Inspector last October.
3. The word “entire” should be added to the phrase in CA1b “ on the remainder of the (entire) Golf club site”
4. With regard to the provision of Healthcare facilities, there needs to be some indication of its size and scope.
5. The car parking requirements for the Clubhouse and the Healthcare facilities need to be made more explicit in terms of the number of spaces to be provided.
6. The provision of open space on CA1b is commendable but the size of the area involved needs to be made explicit.
7. The reference to the Tree Preservation Order should be made clear that it applies to all trees of whatever size or species.
8. An addition to the required Legal Agreement is necessary, to maintain all of the boundaries and security of the remaining land owned by RGC on a permanent basis.
9. Since the new Clubhouse and Healthcare facilities, plus car parking for both, are to be within the confines of CA1b, the number of dwellings must be reduced from the original figure of between 90 and 130.
10. Road safety must always be of prime importance. There are only two effective ways of accessing CA1b and those are via Kidmore End Road from Peppard Road or down Courteney Drive into Kidmore End Road.

Of particular concern is the area in Kidmore End Road by the Children's Playground and Emmer Green Recreation Field more generally. This road is effectively one lane because of the row of parked cars outside the terraced cottages. I believe it would be extremely dangerous to take away the grass verge to widen the road and in any event it would be impossible to widen it by the White Horse Pub.

Lastly the Government Inspector has added a new paragraph (8.3.2) to improve the soundness of the DLP. I believe that the words in red italics should be added as follows:-

“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, as well as the maintenance and security of the boundaries,* and development for residential will not take place until a replacement clubhouse, *healthcare facilities and adequate car parking* is provided and vehicular access from suitable roads is in place.”

Yours Faithfully

T S Teer

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THEATRES TRUST

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



Please return by Wednesday 24<sup>th</sup> July 2019 to: Planning Policy, Civic Offices,  
Bridge Street, Reading, RG1 2LU or email [planningpolicy@reading.gov.uk](mailto:planningpolicy@reading.gov.uk)

**PART A - YOUR DETAILS**

	Personal Details	Agent's Details <i>(if applicable)</i>
Title	Mr	
First Name	Tom	
Last Name	Clarke MRTPI	
Job Title <i>(if applicable)</i>	National Planning Adviser	
Organisation <i>(if applicable)</i>	Theatres Trust	
Address 1	22 Charing Cross Road	
Address 2		
Address 3		
Town	London	
Post Code	WC2H 0QL	
Telephone	020 7836 8591	
E-mail	planning@theatretrust.org.uk	

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

**B1. To which Main Modification does this representation relate?**

MM44

**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.**

The Trust welcomes the changes proposed following Examination, particularly that reference is made to liaising with the Trust. However, there is an inconsistency in the language used within the amended text between CR12e and paragraph 5.4.17 which compromises the ability to ensure theatre re-provision should the Hexagon not be retained. This is because CR12e states the Hexagon "will only be developed if a replacement facility for Reading is provided" whereas 5.4.17 states in that scenario there only "should" be a replacement rather than "must" be a replacement. This inconsistency can also be considered to be incompatible with Policy RL6 which has a strong presumption in favour of retaining leisure facilities (within which theatres have been defined) and paragraph 92 of the NPPF (2019) which seeks policies and decisions to plan positively for cultural buildings and to guard against unnecessary loss.

*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.**

We would suggest the following further minor amendment which would resolve the Trust's concerns cited in part B3:

The policy requires that, where the Hexagon site is proposed to be developed, there ~~should~~ **must** be replacement, which is expected to be within the same area. There will need to be liaison with The Theatres Trust on any proposed replacement.

*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:

## TRANSPORT FOR LONDON

**From:** [Carr Richard](#)  
**To:** [Planning Policy](#)  
**Cc:** [Carr Richard](#); [Jorn Peters](#)  
**Subject:** FW: Reading Borough Local Plan - chance to comment on Main Modifications to the Local Plan  
**Date:** 12 June 2019 14:23:54  
**Attachments:** [image003.jpg](#)

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Thank you for consulting Transport for London (TfL). I can confirm that we have no comments to make on the proposed main modifications. However, in the accompanying minor modifications it may be worth including revised timescales for the start of the operation of Elizabeth Line services and the transfer of responsibility of safeguarding from Crossrail Ltd to TfL to take account of delayed delivery of the Crossrail project

Best wishes  
Richard Carr

**Richard Carr | Principal Planner (Spatial Planning)**  
**TfL Planning, Transport for London**

E: [richardcarr@tfl.gov.uk](mailto:richardcarr@tfl.gov.uk)

A: 9<sup>th</sup> Floor, 5 Endeavour Square, E20, Westfield Avenue, E20 1JN

I work part time and so there may be a short delay in responding to emails

We have recently made changes to our pre-application service and charges, and introduced a new Initial Screening process. For more information please visit: <https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-applications/pre-application-services>

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**From:** Burr, Sarah [mailto:[Sarah.Burr@reading.gov.uk](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

### Reading Borough Local Plan - chance to comment on Main Modifications to the Local Plan

Reading Borough Council is now consulting on Main Modifications to the Local Plan until 24<sup>th</sup> July 2019.

The Council's Local Plan, which will set out the policies for planning decisions in Reading up to 2036, has recently been subject to public examination, held by an independent Planning Inspector. The Inspector has identified a number of modifications necessary to make the plan sound. The Council is now consulting on these proposed modifications. Once modifications are made and the Local Plan is adopted, it will be the main document that informs how planning applications are determined and covers a wide variety of strategic matters, policies and specific sites for development.

We are seeking comments over the next six weeks during a period of public consultation. The full schedule of main modifications to the Plan and the Proposals Map, as well as a Sustainability Appraisal is on the Council's website at: <http://www.reading.gov.uk/newlocalplan> and copies can also be viewed at the Civic Offices, Bridge Street, Reading, RG1 2LU (between 9 am and 5 pm on weekdays) and in all Council libraries (during normal opening hours). Guidance on how to make representations, which includes a representations form which can be used if you wish, is attached.

Please note that, at this stage, comments are only being accepted on the proposed modifications, not the remainder of the plan.



We welcome any comments that you have. Please provide written responses to the consultation by Wednesday 24<sup>th</sup> July 2019. Responses should be sent to: [planningpolicy@reading.gov.uk](mailto:planningpolicy@reading.gov.uk) or Planning Policy Team, Reading Borough Council, Civic Offices, Bridge Street, RG1 2LU.

Following this consultation, the Inspector will produce a final report on soundness and legal compliance of the Local Plan, incorporating the main modifications. If the plan is found to be sound and legally compliant, it can be adopted as Council policy. The Inspector has indicated that a final report could be expected in September 2019 which could lead to formal adoption at full Council in October 2019.

If you would like to be removed from our consultation lists, please let us know. We look forward to receiving your comments.

Regards,

Planning Policy Team  
Planning Section | Directorate of Environment and Neighbourhood Services

Reading Borough Council  
Civic Offices  
Bridge Street  
Reading  
RG1 2LU

0118 937 3337  
Email: [planningpolicy@reading.gov.uk](mailto:planningpolicy@reading.gov.uk)

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TREDER, MARK AND GERALDINE

**From:** [Mark Treder](#)  
**To:** [Planning Policy](#)  
**Subject:** Representation to Main Modifications to the Local Plan - June 2019  
**Date:** 23 July 2019 23:30:09

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**Plan Ref: MM59**

**Policy: CA1b**

As local residents, we are raising the following concerns over the modifications proposed to the Local Plan concerning Reading Golf Club, Kidmore End Road.

1. The modification to remove the requirement to replace any holes used for development does not make sense. This requirement should be retained to be consistent with policy RL6.
2. The new clubhouse should be required to have full facilities commensurate with the golf offering, being a permanent structure located adjacent to the golf course.
3. The reference to provision of Healthcare services is insufficient. As we have recently lost two GP services covering Caversham & Emmer Green, new demand cannot be expected to be absorbed by the remaining over-stretched practices. Hence, new residential development would require adequately staffed healthcare services, along with the appropriate infrastructure to support it, including provision for parking.
4. Matters of road safety in this area needs to be properly addressed. Kidmore End Road currently presents a challenge to vehicular traffic. It also has significant pedestrian use by children using local schools or recreational park and elderly local residents. Increase in road traffic will increase the risk of accidents, traffic blockages and consequent pollution. Hence the full impact of any development needs to be fully considered and policy wording needs to emphasise the need for **safe** road provision for both residents and golf club users.
5. For the same reason the paragraph suggesting 'mitigation of impact on highway network' is too vague. In addition to considerations of safety, the impact of traffic through Caversham needs to be included. For example, bus services in this area have recently been reduced as the company is finding it difficult to meet service timetables due to traffic congestion issues in Caversham and crossing the river Thames.
6. The reference to car parking should emphasise the provision to be adequate for new residential properties, golf club users and healthcare users.
7. The volume of new dwellings approved for construction should be limited to a number that allow sufficient space for clubhouse, healthcare facilities and all on-site parking demands. The number of 90-130 dwellings in the original submission for CA1b would appear too high under these circumstances.
8. The air pollution impact of the proposed development needs to be properly assessed. In the past year, over 100 homes have been added in nearby Sonning Common. We are aware that recent measurements at the end of Peppard Road in Caversham showed air safety limits were breached at peak traffic times. Similar measurements should be taken around the Peppard Road/ Kidmore End junction, as this area will bear the brunt of most traffic increases and is in the vicinity of 2 schools and the recreation ground.

Mark & Geraldine Treder

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UNITE GROUP PLC

**REF: R00039/MC/BH/MR**

By email only (planningpolicy@reading.gov.uk)  
Planning Policy Team  
Civic Offices  
Bridge Street  
Reading  
RG1 2LU

24 July 2019

Dear Sir/Madam,

**READING BOROUGH COUNCIL DRAFT LOCAL PLAN MAIN MODIFICATIONS  
REPRESENTATIONS ON BEHALF OF UNITE STUDENTS**

We are instructed by our client, Unite Group plc (Unite), to submit the enclosed representations to the proposed Main Modifications to the Reading Borough Council Draft Local Plan.

This follows the representations made through the preparation of the Local Plan, the Regulation 19 Consultation held in January 2018 and Examination in Public (EiP) Hearing Statement issued 12 September 2018.

We note that the Council has made a number of amendments to the Local Plan following the EiP. However, our client does not feel that the changes go far enough to ensure that there will be an adequate supply of purpose built student accommodation (PBSA) to satisfy Reading University's projected expansion in student numbers up to 2018.

Following a review of the proposed Main Modifications, our summary of Representations is:

- Support of modification MM21.and
- Objection to proposed modification MM22.

**MM21 (Policy H5 Housing)**

Unite supports the addition of text to paragraph 4.4.36 which confirms that the housing standards set out in Policy H5 apply to Class C3 residential uses only.

**MM22 (Supporting text to policy H12 on student accommodation)**

Whilst a number of largely nonconsequential modifications have been proposed to the supporting text, the wording of Policy H12 has not been amended. There is no change to the main student accommodation policy wording and as such this only permits PBSA development within the University Campus and two other potential sites only. The supporting text refers to two policies – Policy OU1 and Policy ER2 – which should be consulted upon when the need for additional PBSA development is required.

Policy OU1 relates to 'New and Existing Community Facilities' and Policy ER2 relates to 'Whiteknights Campus, University of Reading'. Policy OU1 simply refers to the actual university rather than student accommodation here. Policy ER2 supports the fact that they will direct student accommodation to the campus. Two sites (CR13a and ER1a) are now identified for student accommodation in locations which do not comply with the Policy H12. However, there is no comfort provided that these sites will come forward for PBSA development or that they will satisfy the requirements of the plan.

The modification to new paragraph 4.4.98 highlights the fact that Reading University is expecting significant growth in student numbers up to 2028. However, worryingly, the additional text to paragraph 4.4.96 confirms that there is already a *'shortfall in University accommodation of around 1,000 bed spaces for first year students and, across all years of study, for 2017/18, 5,000 students were not housed in purpose built student accommodation'*. This position will be further exacerbated if adequate PBSA developments cannot be secured efficiently through the planning system in the coming years.

Importantly, the Planning Practice Guidance (PPG) has been updated to include guidance on addressing the need for different types of housing, including student accommodation. In essence, the new guidance seeks to ensure that Local Planning Authorities (LPAs) plan for sufficient student accommodation, have regard to the needs of students in preparing development plans and in doing this, LPAs should engage with and take into account the needs of the universities.

Unite's concerns remain that the Council's policy position unduly restricts the location of purpose-built student accommodation (PBSA) development on or adjacent to existing further or higher education campuses, or as an extension or reconfiguration of existing student accommodation.

Unite feel that Policy H12 would deter the delivery of student housing as there would be a presumption against proposals for new student accommodation on sites (other than within the University Campus or CR13a and ER1a which may not come forward) unless it can be clearly demonstrated how the proposal meets a need that cannot be met on campus or sites adjacent to existing further or higher education campuses. The draft Local Plan has not sufficiently planned for or provided the scope to meet the future student housing requirements in Reading. In terms of addressing the needs for student accommodation, the draft Local Plan contradicts the PPG.

## **Conclusion**

Unite supports proposed modification MM21 but strongly objects to proposed modification MM22 as the restriction of student accommodation to existing campus locations under Policy H12 is inconsistent with national policy and guidance, and is clearly not justified by up to date evidence which makes clear that there is an increasing demand for PBSA in Reading.

I trust that you have all the information you require to validate this application. If, in the interim, you have any queries please do not hesitate to contact either Bethan Hawkins ([bethan.hawkins@rokplanning.co.uk](mailto:bethan.hawkins@rokplanning.co.uk)) or myself at this office. I look forward to your formal acknowledgement of the application.

Yours faithfully,



**Matthew Roe**  
Director  
ROK Planning

T: 0773 0064234

E: [matthew.roe@rokplanning.co.uk](mailto:matthew.roe@rokplanning.co.uk)



UNIVERSITY OF READING

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

25914/A3/NPN/dw

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

24<sup>th</sup> July, 2019

Dear Sir/Madam,

**READING BOROUGH COUNCIL - LOCAL PLAN MAIN MODIFICATIONS JUNE 2019  
REPRESENTATIONS ON BEHALF OF THE UNIVERSITY OF READING**

We write on behalf of our client, the University of Reading, in response to the above consultation which seeks the views of interested parties on the Local Plan Main Modifications.

The University supports MM3, Policy CC3 (Adaption to Climate Change), which inserts the wording "wherever possible." This change reflects the position agreed in the Statement of Common Ground between the University and the Council (EC042).

The University supports MM5, Policy CC9 (Securing Infrastructure), with regard to the deletion of text referring to contributing to the costs of monitoring the implementation and payment of planning contributions. This change reflects the position agreed in the Statement of Common Ground between the University and the Council (EC042).

The University supports the first part of MM18, Policy H2 (Density and Mix), in respect of the change to the paragraph of text which sits beneath the bullet points which recognises that site capacities will depend on various factors that need to be addressed at application stage, including detailed design and layout, and may differ from the range set out in the allocation.

The University **objects**, however to the proposed change in MM18 to Paragraph 4.4.6 in that it does not go far enough to reflect the decision of the recent appeal decision at St Patricks Hall APP/E0345/W/18/3209702 for a net increase of 654 bed spaces (in excess of the capacity stated in the draft Local Plan of 450-500 bed spaces). Moreover, the text in Paragraph 4.4.6 refers solely to dwellings figures and in the context of Policy ER1e, this should be clarified to also refer to student bedroom numbers (bed spaces).



At the Local Plan Examination hearing session, the Council's Local Plan lead officer acknowledged that the Council substituted the bedrooms numbers from new build accommodation on the footprint of Pearson Court at St Patricks Hall from the total number of bed spaces proposed by a previously withdrawn planning application to reach the 450-500 capacity figure. The Local Plan lead acknowledged that the Council did not assess whether or not there were opportunities to provide additional accommodation lost through the retention of Pearson's Court elsewhere within the site (which was an exercise carried out at the time by the Council's planning team as part of pre-application discussions prior to the Appeal Application). In the Council's Closing Statement to the St Patrick's Hall Public Inquiry, it was stated in relation to the site capacity figure in the draft Local Plan that:

**"That figure was calculated from the numbers sought under the withdrawn application, making allowance for the removal of plans for the redevelopment of the northern, eastern and western ranges of Pearson's Court and not on any 'scientific' assessment of capacity."**

The Inspector concluded that:

**"32. I accept that an extra 654 bed spaces would result in a considerable increase in density within the site, irrespective of which method is used for assessing it and irrespective of the actual boundaries taken into account, and that this would be in contrast to other adjacent areas. However, no significant evidence has been produced to show what the actual harm arising from this increase would be.**

**33. I am also aware that the Framework in paragraph 123 seeks to optimise the use of land to meet as much of the identified housing need as possible and that paragraph 122 of the Framework makes clear that planning policies and decisions should support development that makes efficient use of land.**

**34. As such therefore in terms of the density, mix and balance of the proposed development I find no conflict with policy CS15 of the Reading Borough Council Core Strategy (CS).**

**35. In arriving at this conclusion, I am conscious that the emerging plan contains a policy specifically related to redeveloping the appeal site with a figure of 450-500 extra bed spaces included. However, it was made clear at the Inquiry that this range of bed spaces was to some extent plucked out of the air and lacked a firm evidential base. Given this fact and also that the plan is still emerging and has objections I can give little weight to the figures of 450-500." (emphasis added)**

With specific regard to Policy ER1e (St Patricks Hall), in light of the appeal decision for St Patrick's Hall, in so far as an indicative capacity is referred to, it should state 650 bed spaces rather than 450-500. Without this change, MM18 would not be sound as despite the proposed change to refer to indicative capacities, the text of Policy ER1e should be changed to reflect the outcome of the appeal process and the lack of an evidential basis to justify the capacity referred to in the policy. This corresponding change is required to Policy ER1e to ensure consistency with MM18 and to ensure that the Local Plan is positively prepared and justified.

The University supports MM21, Policy H5 (Standards for New Housing) in that these standards do not apply to student housing (text change to Paragraph 4.4.36). This change reflects the position agreed in the Statement of Common Ground between the University and the Council (EC042).

The University supports MM22 (changes to supporting text Paragraphs 4.4.95 to 4.4.98). This change reflects the position agreed in the Statement of Common Ground between the University and the Council (EC042). However, the University **objects** to the changes made to the Sustainability Appraisal in light of MM22 as it does not provide the evidence to support the policy option in Policy H12 and therefore is neither positively prepared nor justified.

The Council asserts that the wording changes in MM22 do not change the assessment in the Sustainability Appraisal as a change to Policy H12 is not proposed.

The University had made representations on the Sustainability Appraisal of Policy H12 (Student Accommodation) at Pre-Submission stage, and reiterated these points in the hearings on 25<sup>th</sup> September, specifically that option iii appraised does not appear to match the policy as drafted.

The Council's response remains as set out during the hearings on 25<sup>th</sup> September, and in the response to Pre-Submission representations from the University (see pages 400-409 of the Statement of Consultation on Pre-Submission Draft Local Plan, LP006), that there had been a mislabelling of the title of the option in the Sustainability Appraisal, and that it should have read 'adjacent to' rather than 'close to'.

In terms of whether a distinct option should be appraised that would reflect the wording changes to H12 proposed by the University, i.e. that student accommodation should be located on university or accommodation sites or other sustainable locations with convenient access, the Council maintained its position expressed in the hearings, that there was no practical difference between this and the 'no policy' option, because at the current time, without locational policy, student accommodation is being delivered close to the university and in the town centre in any case.

The Council has now amended the Sustainability Appraisal to change the wording description (but not the scoring of option iii, and to insert an option iv to reflect that which the University had requested. The Council asserts that under option iv (Policy to direct student accommodation to accessible areas) that there would be likely to be very few differences from a Borough wide approach in option ii as most of the Borough is highly accessible by public transport and thus would lead to conflicts with general housing needs.

The Council has scored option iv the same as Option ii save in two respects. The first is objective 4 (minimising consumption of undeveloped land) where Option iv is scored with a question mark and tick compared to a question mark and cross for Option ii, presumably to reflect the fact that it is highly likely that previously developed land would be utilised in Option iv given proximity to the University. The second difference is Objective 14 (reducing the need to travel), which is scored with a tick in option iv (which the Council acknowledges is a positive aspect of proximity to the University).

Option iv is scored more negatively than the proposed Policy Option iii in only four respects. The first is objective 4 (minimising consumption of undeveloped land), despite that fact that the policy option iii is more likely to require use of previously undeveloped campus land. The second is objective 9 (enhancing landscape and townscape character), despite the fact that significant areas of the campus are undeveloped and have a positive landscape character compared to the largely built up areas in close proximity to the campus. The third is objective 13 (ensuring high quality housing needs). The fourth is objective 20 (maximise access to education), where Option iv is scored less positively than the policy option iii but no explanation is given.

There is therefore a lack of justification and evidence to support the scoring for Option iv, particularly in comparison to the policy Option iii. Whilst the Council purports that there is little difference with option ii (locate student accommodation anywhere in the Borough), this is based on a general interpretation of locational accessibility rather than relative to the campus, and in reality, there is little difference between the policy option iii and option iv. This underlines the University's case that directing student accommodation both to the campus and locations close to the campus in sustainable locations accessible to relevant education institutions is appropriate.

The University's position in summary is that there is a substantial existing shortfall in purpose-built student accommodation (PBSA), which is expected to worsen with growth in student numbers. The University therefore considers that the Council's draft policy position in H12, which directs new student accommodation to existing university or student accommodation sites in the first instance, is unduly restrictive and there should be greater flexibility to include other sustainable locations which are accessible to the relevant institution. New PBSA can make a contribution to housing supply through releasing existing homes occupied by students into the general market.

The University supports MM30, Policy OU1, (New and Existing Community Facilities). This change reflects the position agreed in the Statement of Common Ground between the University and the Council (EC042).

The University supports MM58, Policy CA1a, (Reading University Boat Club). This change reflects the position agreed in the Statement of Common Ground between the University and the Council (EC042).

The University supports MM63, Paragraph 9.2.7. This change reflects the position agreed in the Statement of Common Ground between the University and the Council (EC042).

The University supports MM64, Policy ER1c, (Land Rear of 8-26 Redlands Road). This change reflects the position agreed in the Statement of Common Ground between the University and the Council (EC042).

The University supports MM65, Policy ER2 and Paragraph 9.3.10, (Whiteknights Campus, University of Reading). This change reflects the position agreed in the Statement of Common Ground between the University and the Council (EC042).

The University supports MM67, Proposals Map, Map F. This change reflects the position agreed in the Statement of Common Ground between the University and the Council (EC042).

We trust that the above representations are helpful to you and would appreciate confirmation of their receipt.

Yours faithfully,



**NICK PATERSON-NEILD**

Director

cc. Ms J. Pich - University of Reading

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



Please return by Wednesday 24<sup>th</sup> July 2019 to: Planning Policy, Civic Offices,  
Bridge Street, Reading, RG1 2LU or email [planningpolicy@reading.gov.uk](mailto:planningpolicy@reading.gov.uk)

**PART A - YOUR DETAILS**

**Personal Details**

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

Title

--

Mr

First Name

--

Nick

Last Name

--

Paterson-Neild

Job Title *(if applicable)*

--

Director

Organisation *(if applicable)*

University of Reading
-----------------------

Barton Willmore LLP

Address 1

--

The Blade

Address 2

--

Abbey Square

Address 3

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Town

--

Reading

Post Code

--

RG13BE

Telephone

--

01189430113

E-mail

--

nick.paterson-  
neild@bartonwillmore.co.uk

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

**B1. To which Main Modification does this representation relate?**

MM18, Policy H2 (Density and Mix)

**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 University supports the first part of MM18, Policy H2 (Density and Mix), in respect of the change to the paragraph of text which sits beneath the bullet points which recognises that site capacities will depend on various factors that need to be addressed at application stage, including detailed design and layout, and may differ from the range set out in the allocation.

The University objects, however to the proposed change in MM18 to Paragraph 4.4.6 in that it does not go far enough to reflect the decision of the recent appeal decision at St Patricks Hall APP/E0345/W/18/3209702 for a net increase of 654 bed spaces (in excess of the capacity stated in the draft Local Plan of 450-500 bed spaces). Moreover, the text in Paragraph 4.4.6 refers solely to dwellings figures and in the context of Policy ER1e, this should be clarified to also refer to student bedroom numbers (bed spaces).

At the Local Plan Examination hearing session, the Council's Local Plan lead officer acknowledged that the Council substituted the bedrooms numbers from new build accommodation on the footprint of Pearson Court at St Patricks Hall from the total number of bed spaces proposed by a previously withdrawn planning application to reach the 450-500 capacity figure. The Local Plan lead acknowledged that the Council did not assess whether or not there were opportunities to provide additional accommodation lost through the retention of Pearson's Court elsewhere within the site (which was an exercise carried out at the time by the Council's planning team as part of pre-application discussions prior to the Appeal Application). In the Council's Closing Statement to the St Patrick's Hall Public Inquiry, it was stated in relation to the site capacity figure in the daft Local Plan that:

"That figure was calculated from the numbers sought under the withdrawn application, making allowance for the removal of plans for the redevelopment of the northern, eastern and western ranges of Pearson's Court and not on any 'scientific' assessment of capacity."

The Inspector concluded that:

"32. I accept that an extra 654 bed spaces would result in a considerable increase in density within the site, irrespective of which method is used for assessing it and irrespective of the actual boundaries taken into account, and that this would be in contrast to other adjacent areas. However, no significant evidence has been produced to show what the actual harm arising from this increase would be.

33. I am also aware that the Framework in paragraph 123 seeks to optimise the use of land to meet as much of the identified housing need as possible and that paragraph 122 of the Framework makes clear that planning policies and decisions should support development that makes efficient use of land.

34. As such therefore in terms of the density, mix and balance of the proposed development I find no conflict with policy CS15 of the Reading Borough Council Core Strategy (CS).

35. In arriving at this conclusion, I am conscious that the emerging plan contains a policy specifically related to redeveloping the appeal site with a figure of 450-500 extra bed spaces included. However, it was made clear at the Inquiry that this range of bed spaces was to some extent plucked out of the air and lacked a firm evidential base. Given this fact and also that the plan is still emerging and has objections I can give little weight to the figures of 450-500." (emphasis added)

With specific regard to Policy ER1e (St Patricks Hall), in light of the appeal decision for St Patrick's Hall, in so far as an indicative capacity is referred to, it should state 650 bed spaces rather than 450-500. Without this change, MM18 would not be sound as despite the proposed change to refer to indicative capacities, the text of Policy ER1e should be changed to reflect the outcome of the appeal process and the lack of an evidential basis to justify the capacity referred to in the policy. This corresponding change is required to Policy ER1e to ensure consistency with MM18 and to ensure that the Local Plan is positively prepared and justified.

*Please continue on another sheet if necessary*

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



With specific regard to Policy ER1e (St Patricks Hall), in light of the appeal decision for St Patrick's Hall, in so far as an indicative capacity is referred to, it should state 650 bed spaces rather than 450-500. Without this change, MM18 would not be sound as despite the proposed change to refer to indicative capacities, the text of Policy ER1e should be changed to reflect the outcome of the appeal process and the lack of an evidential basis to justify the capacity referred to in the policy. This corresponding change is required to Policy ER1e to ensure consistency with MM18 and to ensure that the Local Plan is positively prepared and justified.

*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?**

MM22 (Sustainability Appraisal)

**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.**

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The Council asserts that the wording changes in MM22 do not change the assessment in the Sustainability Appraisal as a change to Policy H12 is not proposed.

The University had made representations on the Sustainability Appraisal of Policy H12 (Student Accommodation) at Pre-Submission stage, and reiterated these points in the hearings on 25th September, specifically that option iii appraised does not appear to match the policy as drafted.

The Council's response remains as set out during the hearings on 25th September, and in the response to Pre-Submission representations from the University (see pages 400-409 of the Statement of Consultation on Pre-Submission Draft Local Plan, LP006), that there had been a mislabelling of the title of the option in the Sustainability Appraisal, and that it should have read 'adjacent to' rather than 'close to'.

In terms of whether a distinct option should be appraised that would reflect the wording changes to H12 proposed by the University, i.e. that student accommodation should be located on university or accommodation sites or other sustainable locations with convenient access, the Council maintained its position

expressed in the hearings, that there was no practical difference between this and the 'no policy' option, because at the current time, without locational policy, student accommodation is being delivered close to the university and in the town centre in any case.

The Council has now amended the Sustainability Appraisal to change the wording description (but not the scoring of option iii, and to insert an option iv to reflect that which the University had requested. The Council asserts that under option iv (Policy to direct student accommodation to accessible areas) that there would be likely to be very few differences from a Borough wide approach in option ii as most of the Borough is highly accessible by public transport and thus would lead to conflicts with general housing needs.

The Council has scored option iv the same as Option ii save in two respects. The first is objective 4 (minimising consumption of undeveloped land) where Option iv is scored with a question mark and tick compared to a question mark and cross for Option ii, presumably to reflect the fact that it is highly likely that previously developed land would be utilised in Option iv given proximity to the University. The second difference is Objective 14 (reducing the need to travel), which is scored with a tick in option iv (which the Council acknowledges is a positive aspect of proximity to the University).

Option iv is scored more negatively than the proposed Policy Option iii in only four respects. The first is objective 4 (minimising consumption of undeveloped land), despite that fact that the policy option iii is more likely to require use of previously undeveloped campus land. The second is objective 9 (enhancing landscape and townscape character), despite the fact that significant areas of the campus are undeveloped and have a positive landscape character compared to the largely built up areas in close proximity to the campus. The third is objective 13 (ensuring high quality housing needs). The fourth is objective 20 (maximise access to education), where Option iv is scored less positively than the policy option iii but no explanation is given.

There is therefore a lack of justification and evidence to support the scoring for Option iv, particularly in comparison to the policy Option iii. Whilst the Council purports that there is little difference with option ii (locate student accommodation anywhere in the Borough), this is based on a general interpretation of locational accessibility rather than relative to the campus, and in reality, there is little difference between the policy option iii and option iv. This underlines the University's case that directing student accommodation both to the campus and locations close to the campus in sustainable locations accessible to relevant education institutions is appropriate.

The University's position in summary is that there is a substantial existing shortfall in purpose-built student accommodation (PBSA), which is expected to worsen with growth in student numbers. The University therefore considers that the Council's draft policy position in H12, which directs new student accommodation to existing university or student accommodation sites in the first instance, is unduly restrictive and there should be greater flexibility to include other sustainable locations which are accessible to the relevant institution. New

PBSA can make a contribution to housing supply through releasing existing homes occupied by students into the general market.

*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:

VIRIDIS REAL ESTATE SERVICES LTD

24<sup>th</sup> July 2019

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



Philip Brown  
E: pbrown@savills.com  
DL: +44 (0) 1189 520 506

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

Ground Floor, Hawker House  
5-6 Napier Court  
Napier Road  
Reading RG1 8BW  
T: +44 (0) 118 952 0500  
[savills.com](http://savills.com)

Dear Sir,

**READING BOROUGH COUNCIL – LOCAL PLAN 2036 MAIN MODIFICATIONS CONSULTATION  
RESPONSE IN RELATION TO MAIN MODIFICATIONS MM18 AND MM47 ON BEHALF OF VIRIDIS REAL  
ESTATE SERVICES LTD**

Savills act on behalf of Viridis Real Estate Services Limited (“Viridis”) in relation to land at 38 - 41 Kenavon Drive, Reading (“the site”). This letter has been prepared in response to the Council’s consultation on the Main Modifications to the Pre-Submission Draft Reading Borough Local Plan 2036 (PSLP), in particular:

- Main Modification MM18 that relates to PSLP Policy H2 and specifically how estimates of allocated site capacity should be treated;
- Main Modification MM47 that relates to PSLP Policy CR13c referred to as ‘Kenavon Drive and Forbury Business Park’ and proposed for allocation for residential development.

Viridis are supportive of MM18 and in principle are supportive of the Inspector’s recommended changes to Policy CR13c via MM47, although as explained below it is considered that site CR13c could deliver more housing than the Main Modification suggests.

**Main Modification MM18: Policy H2 – Density and Mix**

The main modification is welcomed, Viridis agree that it is right for final site capacity to be established dependent on a number of factors including detailed design and layout. As well as these factors that are referred to in the Main Modification, site capacity should also be influenced by local site context, which is particularly relevant to site CR13c for the reasons set out in this letter.

**Main Modification MM47: Policy CR13c – East Side Major Opportunity Area**

The Inspector’s Main Modification seeks to raise the indicative site potential from 130-190 to 190-285 new homes in accordance with the Council’s response EC021.

It is noted however, that at Paragraph 4.6 of EC021, the Council acknowledge that Viridis’ estimate of site capacity is up to 500 new homes and that the Council have not discussed their own estimate of site potential with the site owners.

The estimate of site capacity set out in EC021 is based on the adjacent development at 42 Kenavon Drive, with the equally close Homebase and Toys R Us site discounted as an example of an appropriate density of development for site CR13c.

Viridis do not agree with the Council’s view, as expressed in EC021, that the Homebase and Toys R Us site is of limited relevance to the consideration of site capacity at CR13c. As illustrated by the extract from the



approved illustrative masterplan below, the south part of site CR13c is extremely closely related to the Homebase and Toys R Us site and both developments will share a similar relationship with Kenavon Drive.



Figure 1: Approved Illustrative Masterplan

It is considered therefore that the capacity of site CR13c should be based on the Homebase and Toys R Us site, which has planning permission for 715 new homes at a density of 273dph, rather than the 130dph at 42 Kenavon Drive.

Based on a developable site area of 1.83ha, as per the Council's suggestion in EC201, and a density of 273dph, the upper indicative potential for site CR13c should be stated to be 500 new homes. This will ensure that the potential of the site to deliver the homes needed for this part of Reading is optimised in accordance with Paragraph 58 of the 2012 NPPF.

**Conclusion**

In light of the above, we trust that further modifications will be made to PSLP Policy CR13c in order to allow for in the order of 500 new homes to be delivered.

Yours sincerely,



**Philip Brown BA (Hons) MRTPI**  
**Director Planning**



WAITE, PIP

---

**From:** Pip Waite  
**Sent:** 23 July 2019 16:36  
**To:** Planning Policy  
**Subject:** FW: RBC Local Plan - Consultation on Main Modifications

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

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**Subject:** RBC Local Plan - Consultation on Main Modifications

I am very concerned about the development on Reading Golf Course. It concerns me that Reading is losing another part of its 'green lung' and I hope the Council will make sure that provision is made for a family friendly golf course within the Borough and also some provision for golf within South Oxfordshire. It is also important that the size of these facilities is made very clear to the residents before any planning is granted and that all the trees on the course are protected with TPOs. I expect RBC to take very careful consideration of the extra traffic this development will create and to make sure that vehicular access is available to everyone wishing to use the course(s). It is also extremely important that any new healthcare provision is appropriate to the number of new residents moving into the area bearing in mind that two doctors practices have closed down locally in the last two years.

Pip Waite

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

WAKELY, NIGEL

**From:** [Nigel Wakely](#)  
**To:** [Planning Policy](#)  
**Subject:** Local Plan Amendments - MM59/CA1b  
**Date:** 23 July 2019 19:12:14

---

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

I wish to comment on the modification regarding the CA1b site involving a housing development on a part of Reading Golf Club.

In the context of the plan, I welcome the changes made by the council to the wording of CA1b as set out in MM59. I do believe that the drafting could be further improved to strengthen the requirement that the development is conditional on investment being made by the golf club to ensure the long-term viability of a sporting facility covering the entire remainder of the golf club land both within Reading and South Oxfordshire. Whilst this could be included later in the anticipated legal agreement, I think it better that policy is made crystal clear within the plan. For example, the required club house needs to be of proportionate scale and must offer sufficient good quality facilities to make the new golf facility attractive.

However, I remain of the view that CA1b would be better removed from the plan as it looks most unlikely to be deliverable by the golf club. There seem to be few strategic arguments in favour of development on the site other than it simply adds to the number of new homes that could be built in Reading. The many arguments against large-scale development in Caversham and Emmer Green (inadequate infrastructure, road congestion, air quality, etc) have strengthened during the period the plan has been under review and are even more relevant now than when the plan was first drafted. The plan should take full opportunity to support the on-going use of the golf club as a valued sporting facility for Reading and retain the site as a tract of scarce green space. Housing development should be prioritised in areas where it is most needed and most easily supported by suitable infrastructure.

Nigel Wakely

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WHEELER, ROBERT

---

**From:** Bob Wheeler  
**Sent:** 15 July 2019 16:42  
**To:** Planning Policy  
**Subject:** RE: Reading Borough Local Plan - chance to comment on Main Modifications to the Local Plan  
**Attachments:** CA1b\_Representations\_Form\_190715.pdf

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

Dear Sirs,

Please find attached my completed Representations Form relating to modifications to Policy CA1b of the Local Plan

Yours faithfully,

Robert Wheeler

---

**From:** Planning Policy <[planningpolicy@reading.gov.uk](mailto:planningpolicy@reading.gov.uk)>  
**Sent:** 12 June 2019 12:29  
**To:** Planning Policy <[planningpolicy@reading.gov.uk](mailto:planningpolicy@reading.gov.uk)>  
**Subject:** Reading Borough Local Plan – chance to comment on Main Modifications to the Local Plan

### **Reading Borough Local Plan - chance to comment on Main Modifications to the Local Plan**

Reading Borough Council is now consulting on Main Modifications to the Local Plan until 24<sup>th</sup> July 2019.

The Council's Local Plan, which will set out the policies for planning decisions in Reading up to 2036, has recently been subject to public examination, held by an independent Planning Inspector. The Inspector has identified a number of modifications necessary to make the plan sound. The Council is now consulting on these proposed modifications. Once modifications are made and the Local Plan is adopted, it will be the main document that informs how planning applications are determined and covers a wide variety of strategic matters, policies and specific sites for development.

We are seeking comments over the next six weeks during a period of public consultation. The full schedule of main modifications to the Plan and the Proposals Map, as well as a Sustainability Appraisal is on the Council's website at: <http://www.reading.gov.uk/newlocalplan> and copies can also be viewed at the Civic Offices, Bridge Street, Reading, RG1 2LU (between 9 am and 5 pm on weekdays) and in all Council libraries (during normal opening hours). Guidance on how to make representations, which includes a representations form which can be used if you wish, is attached.

Please note that, at this stage, comments are only being accepted on the proposed modifications, not the remainder of the plan.

We welcome any comments that you have. Please provide written responses to the consultation by Wednesday 24<sup>th</sup> July 2019. Responses should be sent to: [planningpolicy@reading.gov.uk](mailto:planningpolicy@reading.gov.uk) or Planning Policy Team, Reading Borough Council, Civic Offices, Bridge Street, RG1 2LU.

Following this consultation, the Inspector will produce a final report on soundness and legal compliance of the Local Plan, incorporating the main modifications. If the plan is found to be sound and legally

compliant, it can be adopted as Council policy. The Inspector has indicated that a final report could be expected in September 2019 which could lead to formal adoption at full Council in October 2019.

If you would like to be removed from our consultation lists, please let us know. We look forward to receiving your comments.

Regards,

Planning Policy Team  
Planning Section | Directorate of Environment and Neighbourhood Services

Reading Borough Council  
Civic Offices  
Bridge Street  
Reading  
RG1 2LU

0118 937 3337  
Email: [planningpolicy@reading.gov.uk](mailto:planningpolicy@reading.gov.uk)

[Website](#) | [Facebook](#) | [Twitter](#) | [YouTube](#)



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



Please return by Wednesday 24<sup>th</sup> July 2019 to: Planning Policy, Civic Offices,  
 Bridge Street, Reading, RG1 2LU or email [planningpolicy@reading.gov.uk](mailto:planningpolicy@reading.gov.uk)

**PART A - YOUR DETAILS**

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



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

**B1. To which Main Modification does this representation relate?**

CA1b 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.**

It leaves too many opportunities for a developer to not comply with the Policy in a way that would impact adversely on the local community.

The suggested wording modifications attached to this representation will improve the soundness of the Policy.

*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 refer to following 2-page document:

"CA1b modified text with specific wording changes"

This document includes my reasons for suggesting the changes

*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:

## CA1b MODIFIED TEXT WITH SPECIFIC WORDING CHANGES

## REASON

CA1b MODIFIED TEXT WITH SPECIFIC WORDING CHANGES	REASON
<p>“CA1b PART OF READING GOLF COURSE, KIDMORE END ROAD:</p> <p>Development for residential and <a href="#">permanent</a> replacement clubhouse, subject to the future provision of golf <a href="#">in perpetuity</a> on the remainder of the <a href="#">entire</a> Golf Club site, which fulfils an important sports and leisure function for Reading, being secured. On-site facilities should be provided to mitigate impacts on community infrastructure, including for healthcare. On-site public open space will be provided.</p>	<p><i>To ensure the replacement clubhouse and remainder of the Golf Club land is retained for a sports and leisure function and not developed for more housing</i></p>
<p>Development should:</p>	
<ul style="list-style-type: none"> <li>• Avoid adverse effects on important trees including <a href="#">all trees</a> <del>those</del> protected by TPO;</li> </ul>	<p><i>To make it clearer that <a href="#">all trees</a> on the site are currently protected by a TPO</i></p>
<ul style="list-style-type: none"> <li>• Provide a green link across the site from Kidmore End Road to the remainder of the golf course, rich in plant species and habitat opportunities;</li> </ul>	
<ul style="list-style-type: none"> <li>• Ensure that vehicular access is provided from suitable roads to the area to be retained for golf;</li> </ul>	
<ul style="list-style-type: none"> <li>• Take measures to <a href="#">ensure road safety and</a> mitigate impacts on the highway network, particularly on Kidmore End Road and Tanners Lane;</li> </ul>	<p><i>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</i></p>
<ul style="list-style-type: none"> <li>• Include all parking requirements within the site to avoid exacerbating parking issues on existing streets. <a href="#">In particular, sufficient parking spaces must be provided for the replacement clubhouse (&gt;150 spaces) and healthcare facility (&gt;50 spaces)</a></li> </ul>	<p><i>To ensure that sufficient space is allocated to these specific buildings</i></p>
<ul style="list-style-type: none"> <li>• Take account of potential archaeological significance; and</li> </ul>	

<ul style="list-style-type: none"> <li>• Take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water, and make provision for upgrades where required.</li> </ul>	
<p>Site size: 3.75 ha <u>maximum</u> 90-<del>130</del> dwellings, community provision including healthcare and replacement clubhouse <u>which must be completed before building of any residential properties are started</u>”</p>	<p><i>Maximum number of dwellings must be reduced to account for space required for healthcare provision, replacement clubhouse and associated parking requirements</i></p>
<p>Add new paragraph and renumber subsequent paragraphs:</p> <p>“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 <u>safe</u> 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 <u>permanently</u>, and development for residential will not take place until a replacement clubhouse, <u>healthcare facility and adequate car parking</u> is provided and vehicular access from suitable roads is in place.”</p>	<p><i>To include text to incorporate the recommended wording changes to Policy CA1b (as above)</i></p>

Notes: Amendments have been highlighted in blue  
~~Strike-through~~ text indicates deletion  
Underlined text indicates addition