

# Reading Local Plan Examination

## Issue 13: Caversham and Emmer Green

Hearing Statement on behalf of T A Fisher

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## 1.0 Introduction

- 1.1 This Hearing Statement has been prepared by Arrow Planning Limited on behalf of T A Fisher. T A Fisher has previously submitted representations to the Local Plan in respect of Policy CA1d. This Statement should be read in conjunction with those earlier representations.
- 1.2 T A Fisher are a local housebuilder who have interests in the land included within Policy CA1d. They have previously constructed the adjoining Overton Drive scheme, which sits centrally within the CA1d allocation.
- 1.3 This Statement has been prepared in response to the Inspector's list of main matters, and in particular Question 4 of Issue 13.
- 1.4 As confirmed in our email of the 6<sup>th</sup> August 2018, we intend to appear on behalf of our client at the Issue 13 Hearing session.

## 2.0 Issue 13: Caversham and Emmer Green

### Inspector Question 4

- 2.1 Question 4 of the Inspector's list of questions for Issue 13 queries whether the requirements of Policy CA1d are justified. Our representations at the Regulation 19 consultation stage raised this exact issue in respect of 6 points.
- 2.2 Since that time, Reading Borough Council (RBC) have provided a list of minor changes prior to submission of the Plan (document LP008). This list of minor changes proposes two changes to Policy CA1d.
- 2.3 Change 93 proposes an amendment to the policy wording such that air quality impacts should only be addressed in respect of the southern portion of the site. Change 103 proposes an amendment to the allocation boundary to include land up to the public highway.
- 2.4 We are pleased that the Council has made these proposed changes, which address points 1 and 4 of our previous submission. We can therefore confirm we have no objection to those changes.
- 2.5 However, despite these changes we consider that there remain elements of the policy wording that are not justified.

### Green Link

- 2.6 As set out in our point 2, the proposed green link is not deliverable and would not be capable of connecting the site to the wider area. This is due to the absence of sufficient land or green space in Overton Drive to connect the site back through to All Hallows Road. This will be evident to the Inspector upon their site visit.
- 2.7 Furthermore, the future of the link cannot be secured. The link would extend through back gardens and therefore future owners of the

individual properties could choose to remove elements of the link, thus severing it in places. It would therefore not serve any purpose.

- 2.8 Finally, the requirement for a green link is not justified by the evidence base. The Sustainability Appraisal (LP011) is not correct in respect of its assessment of this element of the site. It states on p.294 that development could sever a green link which means a potential effect on wildlife. The land in question presently comprises back gardens, so development would not change the use for much of the land in question.
- 2.9 No evidence is provided to justify why this green link is required, nor whether it is currently in use by wildlife. Instead it appears to have been carried forward in the Plan from the current Proposals Map without a full assessment as to whether it is necessary or justified.

Archaeology and Contamination

- 2.10 Our earlier representations also contended that the requirement for the development to specifically address archaeological and ground contamination issues are not justified. We maintain this position.
- 2.11 No evidence has been provided to justify why these requirements have been included. As applicants and ultimate developers of the adjoining Overton Drive scheme, our clients undertook the necessary assessments to obtain planning permission and ultimately build, and sell, those homes. At no point during that process did any investigations identify any contamination risk or archaeological interest.
- 2.12 Due to the lack of evidence identifying the need for these requirements, they should be removed from the Policy wording as they are not justified.

Dwelling Numbers

- 2.13 The final point in our original submission was in respect of the proposed number of dwellings on the site. RBC have since responded with reference to the wording of the supporting text. Whilst we acknowledge that the supporting text does suggest that these figures are indicative, it still suggests that the majority of figures are “maximum” figures.
- 2.14 We propose the deletion of the word “maximum” from paragraph 8.3.2. The paragraph states that the capacity of the sites will be determined by a number of factors at the application stage, including the requirement to comply with other policies. We therefore contend that the word “maximum” is not justified or necessary in this instance.

**3.0 Summary**

- 3.1 This statement is submitted on behalf of T A Fisher, in response to the Inspector’s Question 4 for Issue 13, Caversham and Emmer Green.
- 3.2 This statement confirms no objection to the proposed minor changes to Policy CA1d. However, it maintains our client’s original objection to the policy requirement for a green link; archaeological work; and a



contamination assessment. No evidence is provided for these requirements and therefore the policy wording is not justified.

- 3.3 Finally, it proposes the deletion of the word “maximum” from paragraph 8.3.2 as the requirement for this word is not justified.