

READING BOROUGH LOCAL PLAN EXAMINATION COUNCIL COMMENTS ON SUBMISSION BY WATES DEVELOPMENT LTD AND READING GOLF CLUB

This note sets out the comments of Reading Borough Council officers ('the Council') on the submission reference EP043 provided by Wates Development Ltd and Reading Golf Club ('Wates/RGC') on the subject of proposed allocation CA1b, Part of Reading Golf Club, in the Reading Borough Local Plan. It should be noted that these are officer level comments only at this stage.

These comments cover the following matters:

- Deliverability of the proposed allocation CA1b;
- The Wates/RGC proposal;
- Other matters within the Wates/RGC submission; and
- Potential changes to the allocation.

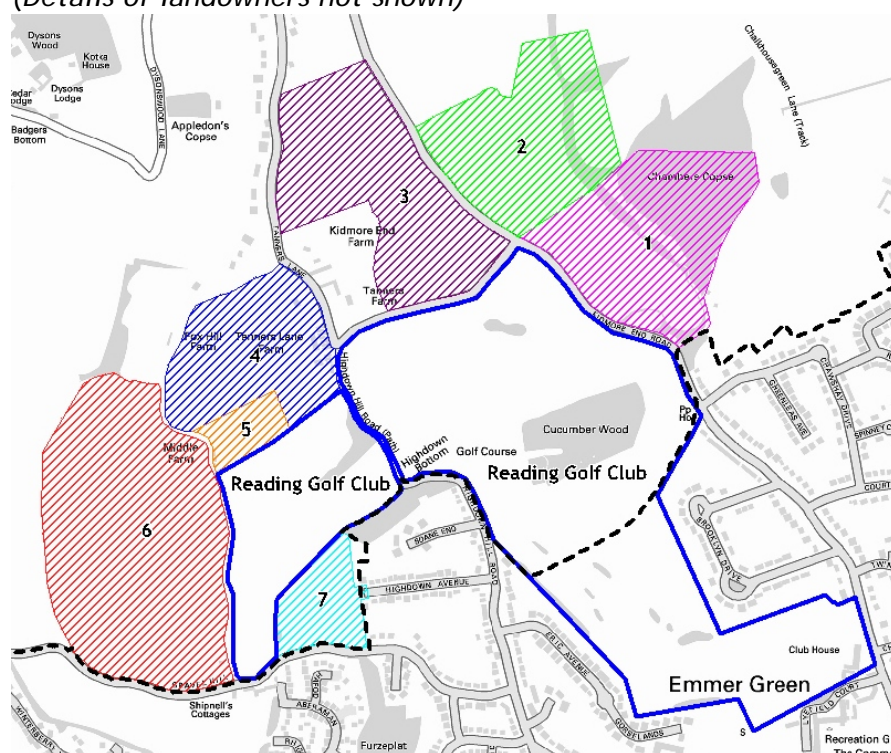
Deliverability of the Proposed Allocation CA1b

The Council are not in a position to carry out a detailed assessment of the finances of Reading Golf Club, and give a view on the degree to which RGC has no option but to move from its current site. The submission certainly seems to demonstrate that a business as usual approach is not sustainable in the long-term. We are not however clear about the extent to which the £0.87-£1.27 million's worth of 'Investment Projects' shown in Appendix 1, i.e. irrigation, car park resurfacing and kitchen upgrade are essential to keep the golf club financially secure, given the scale of these projects in relation to the golf clubs income and reserves. The latter two items would presumably be covered by the provision in CA1b for a new clubhouse. Without an up-to-date offer on the table to carry out the development envisaged in CA1b, it is not possible to categorically confirm that it is not deliverable.

There are also question marks around evidence relating to securing additional land for two new holes. The e-mail contained in Appendix 6 from representatives of Tanners Farm is quite clear, but dates from 2015, and discussions do not appear to have been pursued since then.

In addition, the land which appears, on the basis of information available to the Council, to be the subject of discussions in Appendix 6 is only one ownership. The Council has examined Land Registry details, and, according to those records, there are seven separate ownerships that adjoin Reading Golf Club land in South Oxfordshire, which are identified on Figure 1. The land which the Council believes is the subject of the e-mail is shown as site 3. Site 7 was the subject of a planning application for residential development which was refused in September 2018 (South Oxfordshire District Council reference P18/S1522/O). This does not mean that all or any of those pieces of land would necessarily be suitable or available for golf use, and may be constrained by matters such as important habitats, access (particularly where divided by a road) or topography. However, the submission does not appear to consider their availability.

Figure 1: Ownerships adjoining Reading Golf Club in South Oxfordshire
(Details of landowners not shown)



The Council accepts that land on the edge of Emmer Green is likely to be subject to residential hope value. This has no doubt been exacerbated by proposals for residential development such as those from Gladman (currently at appeal) and by the Golf Club itself. The outcome of consideration of those proposals will affect this land value.

In general, the Council accepts that the Wates/RGC submission casts considerable doubt over the delivery of the CA1b allocation, although it stops some way short of conclusively demonstrating that it is undeliverable.

The Wates/Reading Golf Club Proposal

The Council is also not certain whether the golf offer as proposed by Wates/RGC in their submission is itself deliverable. This does not appear to be a proposal that Wates/RGC itself would implement or operate, and there is no indication that potential operators have been approached. Appendix 4 of the submission mentions that 9-hole golf already exists at Grey's Green at Peppard Common which is only 3-4 miles from the RGC land, and this is soon to be expanded to include a driving range. Whilst it is accepted that England Golf considers facilities such as this to be part of golf's future, it is not clear whether there is sufficient demand to allow for a competitor facility in such close proximity. The risk would be that a golf operation would prove unviable after a few years and there would be reduced options for the future of the land.

In addition, provision of the new model of golf on the rest of the site would be dependent on securing a small clubhouse and car parking on land in South Oxfordshire. The Council has held no discussions with SODC about whether permission for these facilities would be likely to be granted. There would also need to be vehicular access from roads within South Oxfordshire, presumably the

northern part of Kidmore End Road or Tanners Lane, both of which are narrow country lanes, and would presumably require further assessment before SODC could come to a view on their suitability for the additional trips generated by this access, particularly if the proposals will be open to the general public. The Council is therefore not in a position to be certain that the golf proposals in the submission would be acceptable to SODC.

In terms of suitability, the Council expressed concerns during the examination hearings about the potential loss of leisure provision, in particular whether it would lead to a Sport England objection. The submission notes that there is no requirement to consult with Sport England, as it is not playing field. That may be true, but this is a Local Plan, not a planning application, and it is important that bodies such as Sport England are consulted. However, the comments and overall strategy from England Golf contained within the submission very much support the added value that different models of golf can bring to expanding the popularity of the game, even on a reduced footprint. These comments are underlined by the response of Sport England to the RGC submission, which supports the general principle of the alternative golf offer and the merger with another club, albeit with some caveats about the layout and delivery of the proposal. The Council is therefore satisfied that the proposed golf offer in the submission, if secured as part of a proposal, could be demonstrated to be in compliance with policy RL6 of the Local Plan, paragraph 74 of the 2012 NPPF (against which the Plan is assessed) or paragraph 97 of the 2018 NPPF (against which a future application will be assessed).

RGC propose a change to the site boundary, to include the strip along the north of the site bordering back gardens in Brooklyn Drive. The Council has no particular issue with extending the site boundary as long as it does not result in additional development over and above what has been assessed. Without additional development, it would allow for a redistribution of landscaping across the site, which in turn allows for greater flexibility to avoid damage to significant trees and potentially more useable open space provision. This extension would not trigger any of the suitability issues set out in the Housing and Economic Land Availability Assessment any more than the existing site area. As originally envisaged by CA1b, this land would not have been part of a retained golf course in any case, rather it would be likely to provide access to the site. Access to the remaining golf offer could instead be provided through the residential development, and this could be confirmed within the policy. Therefore, extending the boundary would involve:

- A boundary change to the Proposals Map
- A change to the policy regarding the site area, from 3.75 ha to 4.29 ha
- A change to refer to access to the golf provision

Other Matters in the Wates/RGC Submission

The Council has not viewed the detailed technical work that Wates/RGC have prepared, and are not therefore in a position to respond to the specific points made in section 3 of Wates'/RGC's submission. These matters will be for detailed consideration at development management stage. However, in general the overall conclusions in this section align with the Council's contention that the development of the land for residential as outlined in policy CA1b is suitable.

The Council does not wish to comment on Wates'/RGC's response to individual representations set out in section 4 of the submission.

Potential Changes to the Allocation

In summary, the Council accepts that there are strong question marks about the delivery of the policy as currently drafted, although does not believe that it has been conclusively shown to be undeliverable. The alternative golf provision shown by RGC is likely to be broadly suitable in terms of planning policy, but there are also potential questions to answer about the delivery of that alternative and specific proposals such as new accesses and buildings.

With all of the above considerations in mind, the Council considers that there are three possible options for the Local Plan, as follows:

1. That the allocation CA1b be deleted;
2. That the wording changes proposed by RGC be made; and
3. That alternative wording changes be made.

In terms of Option 1, the main issue for the Local Plan is that the site will fail to make any contribution to housing supply, in the context of an overall housing figure in the Local Plan which already does not meet the need in full. Any loss of housing sites within the Local Plan will reduce the ability to meet housing needs. The Reading Golf Club allocation is also one that would have been expected to make a substantial contribution to Reading's considerable need for affordable housing, as well as providing one of the few opportunities in the Borough for larger family housing, and potentially self-build.

However, the loss of the site would not be fatal to the overall approach of the Local Plan. The dwelling figures make an allowance for non-implementation rates, and as discussed throughout the examination, there is scope on individual allocations for the actual dwellings achieved to be higher or lower than the ranges set out in policy. The Council's note on dwelling ranges (EC021) considers that the policy dwelling ranges for both policy CR13c and CR12b could be increased, and this could balance out the loss of CA1b, albeit that it would preferably be additional housing rather than replacement of losses elsewhere. There is also flexibility in the Memorandum of Understanding on Reading's Unmet Needs, set out in the Duty to Co-operate Statement (EV001), with the agreement about unmet needs relating to a range of 500-1,000 dwellings rather than the identified Local Plan shortfall of 644.

Option 2, the wording change proposed by Wates/RGC, is the deletion of the reference to securing additional holes in South Oxfordshire. The issue with this change is that it does not provide an indication on what the future of the remainder of the golf club land is to be. Although it does refer to provision of a clubhouse, there is potential for such an allocation to enable this to be the first phase of a larger scale development, which is precisely the fear of many local residents. The Inspector made clear that the examination cannot consider a larger development scheme at this stage, but the Council's view is firmly that, if there is to be such a proposal, it is far preferable to consider it as a whole so that the full range of implications, including the need for new infrastructure such as transport and education, is considered at the outset. A more gradual development risks missing opportunities for securing such infrastructure. Ideally, consideration of a wider proposal would be through future Local Plan processes, in conjunction with SODC.

The Council's preferred option is Option 3. It is considered that alternative changes could be made in place of the existing requirement to secure additional

land for two holes, and that this could refer to the need to secure the future golf use of the remaining land without being specific as to how this would be achieved. The advantage of this approach would be that it includes flexibility to give the greatest potential for delivery. It would allow firstly for the original proposal for additional land being secured in South Oxfordshire. Secondly, it would allow for the proposal within Wates' /RGC's submission, which has the broad support of England Golf, and appears to tie in with the future of the game. Thirdly, it would also enable any proposal for an 18-hole golf course on a consolidated footprint, as proposed by some golf club members, albeit that the planning issues highlighted in Appendix 7, in particular related to the ancient woodland which is within the SODC portion of the site, are noted. This would maximise the chances of delivery of the development alongside securing the future of the rest of the land. The remainder of the policy would be unchanged, as is also proposed by Wates/RGC.

The Council's proposed wording is set out below:

CA1b PART OF READING GOLF COURSE, KIDMORE END ROAD

Development for residential and replacement clubhouse, subject to ~~additional land in South Oxfordshire being secured for replacement holes~~ the future provision of golf on the remainder of the Golf Club site being secured with suitable access. On-site facilities should be provided to mitigate impacts on community infrastructure, for instance for healthcare. On-site public open space will be provided.

Development should:

- *Avoid adverse effects on important trees including those protected by TPO;*
- *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;*
- *Take measures to mitigate impacts on the highway network, particularly on Kidmore End Road;*
- *Take account of potential archaeological significance; and*
- *Take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water, and make provision for upgrades where required.*

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

A change to the Proposals Map would also be required to amend the site boundary in line with that shown in Appendix 2 of the submission.