JANUARY 2021 | JB/JW | P19-2877PL

OUTLINE PLANNING APPLICATION, WITH MATTERS RESERVED IN RESPECT OF APPEARANCE, FOR DEMOLITION OF THE EXISTING CLUBHOUSE AND THE ERECTION OF A NEW RESIDENTIAL-LED SCHEME (C3 USE TO INCLUDE AFFORDABLE HOUSING) AND THE PROVISION OF COMMUNITY INFRASTRUCTURE AT READING GOLF CLUB

PLANNING STATEMENT

READING GOLF CLUB, 17 KIDMORE END ROAD, EMMER GREEN, READING, BERKSHIRE, RG4 8SQ.

FAIRFAX (READING) LIMITED AND READING GOLF CLUB LIMITED

TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
PLANNING AND COMPULSORY PURCHASE ACT 2004

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1. INTRODUCTION

1.1 This planning statement has been produced in support of an outline planning application, with matters reserved in respect of appearance, for demolition of the existing clubhouse and the erection of a new residential-led scheme (C3 use to include affordable housing) and the provision of community infrastructure at Reading Golf Club. The application is submitted jointly by Fairfax (Reading) Limited (hereinafter referred to as 'Fairfax') and Reading Golf Club Limited (hereinafter referred to as 'RGC').

1.2 In addition to this Planning Statement, this application is accompanied by the relevant application forms and certificates, duly signed and completed, the correct planning fee and the following documents and plans:

- Completed Planning Application Form and Certificates
- Completed CIL Additional Information Form

- Planning drawings by Paul Hewett Architects and Pegasus Group, comprising:
  - 2054-PL01 Location Plan
  - 2054-PL02 Constraints Plan
  - 2054-PL03 Opportunities and Parameters Plan
  - 2054-PL04 Site Layout, Rev A
  - 2054-PL05 Site Layout Section 1, Rev A
  - 2054-PL06 Site Layout Section 2, Rev A
  - 2054-PL07 Site Layout Section 3, Rev A
  - 2054-PL08 Site Layout - Affordable Units
  - 2054-PL09 Site Layout – Car Parking
  - 2054-PL10 Indicative Street Scenes Sheet 1
  - 2054-PL11 Indicative Street Scenes Sheet 2
  - 2054-PL12 Indicative Floor Plans Sheet 1
  - 2054-PL13 Indicative Floor Plans Sheet 2
  - 2054-PL14 Indicative Floor Plans Sheet 3
  - 2054-PL15 Indicative Floor Plans Sheet 4
  - 2054-PL16 Indicative Floor Plans Sheet 5
  - 2054-PL17 Indicative Floor Plans Sheet 6
  - 2054-PL18 Indicative Floor Plans Sheet 7
  - 2054-PL19 Indicative Floor Plans Sheet 8
  - 2054-PL20 Indicative Floor Plans Sheet 9
  - 2054-PL21 Indicative Floor Plans Sheet 10

- 2054-PL22 Indicative Floor Plans Sheet 11
- P19-2877_01H Community Infrastructure Plan, Rev H
- P19-2877_03 Density Plan

- Landscape and Open Space Plans by fabrik, comprising:
  - D2743 Reading Golf Club L_101 Compensatory Tree Planting Plan, Rev 01
  - D2743 Reading Golf Club L_102 Green Space Provision, Rev 03
  - D2743 Reading Golf Club L_103 Tree Plan, Rev P10
  - D2743 Reading Golf Club L_104 Cross Sections, Rev 03
  - D2743 Reading Golf Club L_105 Key Area 1, Rev 03
  - D2743 Reading Golf Club L_106 Key Area 2, Rev 03

- Tree Constraints and Protection Plans by Arbortrack Systems, comprising:
  - Tree Protection Plan (Proposed layout + tree data & shadows), Rev G
  - Tree Protection Plan (Proposed layout + tree data), Rev G
  - Tree Constraints Plan (Tree survey plan on existing layout), Rev F

- Utilities Plans by Temple Group/Ridge and Partners LLP, comprising:
  - 5010065-RDG-XX-ST-PL-ME-9901 - C Services Diagram

- Schedule of accommodation and parameters detail by Paul Hewett Architects
- Design and Access Statement by Paul Hewett Architects
- Landscape DAS, December 2020 Addendum, by Fabrik

- Arboricultural and Planning Integration Report, December 2020 Update, by Arbortrack
- Dormouse Survey Report by Ecology Co-op
- Energy and Sustainability Strategy by Temple Group/Ridge and Partners LLP
- Geophysical Survey Report by Magnitude Surveys
- Landscape and Ecological Management Plan & Biodiversity Impact Calculation by Ecology Co-op
- Lighting Assessment, December 2020 update, by Stantec
- Minerals Resource Assessment by Stantec
- Planning Statement, including Affordable Housing Statement and CIL/S106 Obligations Statement, by Pegasus Group
- Soils Survey Report and Figures by Temple Group/Reading Agricultural Consultants

- Statement of Community Involvement by Cumpsty Communications
- Superfast Broadband Strategy Statement, December 2020 Update, by Stantec
- Topographical Survey by MAP

- Environmental Impact Assessment, by Temple Group with consultant input from Fabrik, Stantec, Archaeology South East and the Ecology Co-op, comprising:
    - Statement of Environmental Impact Assessment Conformity, December 2020
    - Volume 1 Non-Technical Summary (NTS) Summary of the ES in nontechnical language.
    - Volume 2 Main Text
        - 1 Introduction
        - 2 The Site Description of the Site and its surrounding environs.
        - 3 EIA Methodology Methods used to prepare each chapter (including limitations), description of ES structure and content, generic significance criteria, scoping and consultation.
        - 4 Alternatives Considered and Design Iterations Description of the main alternatives considered.
        - 5 The Proposed Development and Construction Overview Description of the Proposed Development and details of the construction.
        - 6 Socio-Economic Assessment of effects on social factors, housing and recreational facilities.
        - 7 Air Quality Assessment of air quality effects, December 2020 update.
        - 8 Traffic and Transport Assessment of traffic and transport effects, December 2020 update.
        - 9 Noise and Vibration Assessment of noise and vibration effects.
        - 10 Water Resources, Drainage and Flood Risk Assessment of effects on water quality, including effects relating to drainage and flood risk.
        - 11 Ecology Assessment of ecological effects.
        - 12 Archaeology and Built Heritage Assessment of effects on local archaeology and built heritage.

        - 13 Climate Change and Greenhouse Gas Emissions Assessment on the effect on global climate change and greenhouse gas emissions.
        - 14 Effect Interactions Assessment of potential for both intra (Type 1) and inter (Type 2) cumulative effects.
        - 15 Residual Effects and Conclusions Summary of the conclusions of the technical chapters of the ES (including Residual and Cumulative Effects).
    - Volume 3 Landscape and Visual Impact Assessment (LVIA) of effects on landscape and views.
        - Volume 3 LVIA Addendum, December 2020
    - Volume 4 ES Technical Appendices Supporting Assessments, Data, figures and photographs to support of Volume 2.
    - Technical Appendices:
        - A: Consultation A1: Scoping Report A2: Scoping Opinion
        - B: Traffic Assessment
        - C: Noise and Vibration Impact Assessment
        - D: Water and Flood Risk D1: Flood Risk Assessment (FRA) D2: Outline Drainage Strategy (SuDS) D3: Utilities Strategy
        - E: Air Quality
        - F: Phase 1 Ground Contamination Survey
        - G: Ecology G1: Ecological Impact Assessment (EcIA) G2: Preliminary Ecological Assessment (PEA)
        - H: Archaeology and Built Heritage H1: Archaeology Desk Based Assessment (Heritage Statement)
        - I: Climate Change

1.3 Whilst no opinion was sought from Reading Borough Council regarding whether the site forms development requiring Environmental Impact Assessment (EIA) and whilst the applicant and consultant team do not consider that the scheme meets requirements for this assessment to be required, given perceived site sensitivities, a decision was taken to progress with this more rigorous form of assessment to help strongly identify how the scheme can be brought forward in a sensitive and wholly appropriate manner.

2. SITE LOCATION AND DESCRIPTION

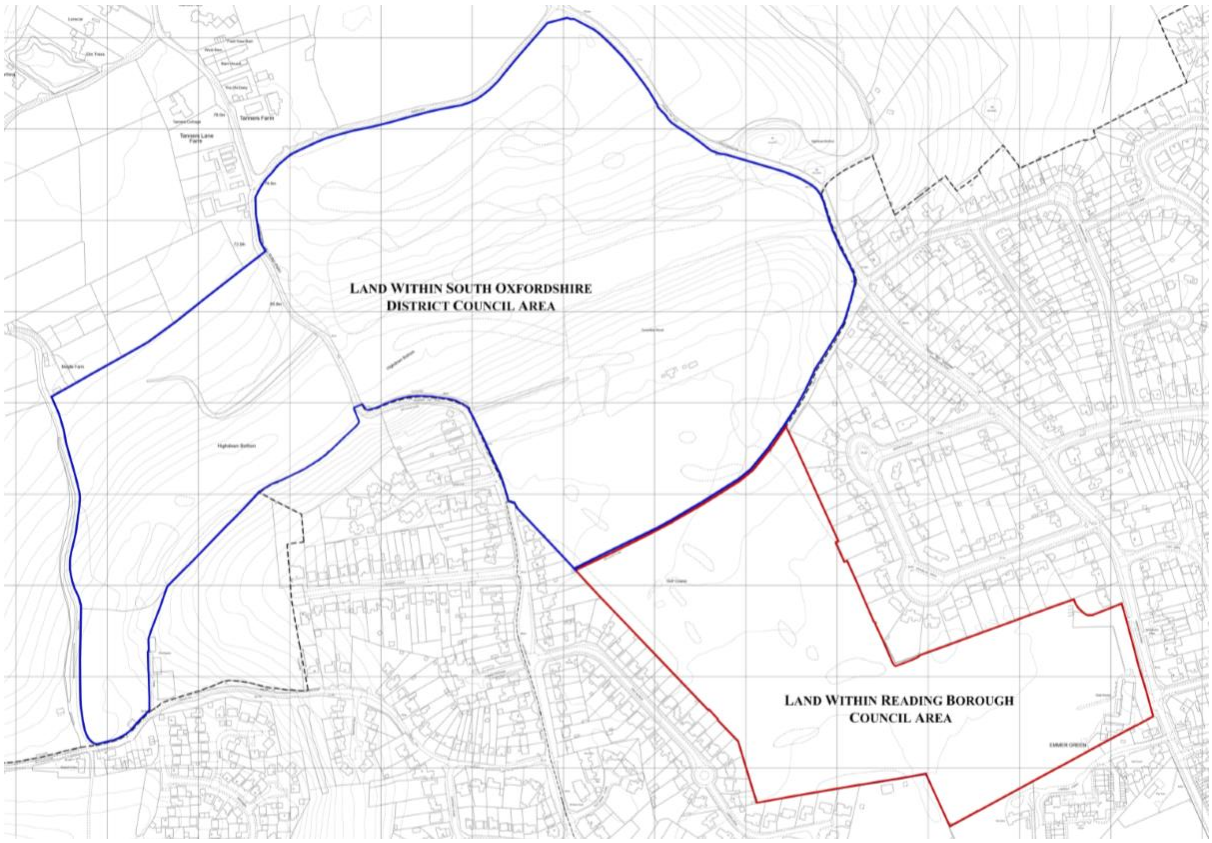


Figure 1 – Indicative boundaries of Local Authority Administrative areas in context of RGC land ownership

2.1 RGC is located in Emmer Green, to the north of Reading. It is c. 42 hectares in area and straddles two local authority areas: Reading Borough Council (RBC) to the south and South Oxfordshire District Council (SODC) to the north. The application site lies wholly within RBC and consists of the southern part of RGC, which is an area of 12.15 hectares (30.02 acres). The site is irregular in shape, lying to the west of Kidmore End Road and is identifiable by the red line shown in Figure 1. All other land owned by RGC, which sits in the SODC administrative area, is identifiable by the blue line shown in Figure 1.

2.2 The existing access to RGC is taken from the southern end of the Kidmore End Road frontage. The access runs into a tarmac surfaced car park, which extends along the western side of Kidmore End Road, before turning west along the rear of properties on Kidmore End Road and then continuing to the rear of properties on Brooklyn Drive, which abut the northern (current 18th hole) and eastern (current 17th hole) boundaries of the application site as a less formal stone and

gravel track for the purposes of providing access to the course and to the grounds maintenance buildings, which are located in Cucumber Wood.

2.3 There is a secondary access point from Kidmore End Road, which is located close to the northern boundary with residential properties and can be used for emergency vehicles or to access the golf club car park. This access has largely remained closed historically.

2.4 The southern boundary (current 1st hole) of the application site features a mature hedge, of varying heights, which is also populated by a number of mature trees, which help to give this boundary of the site a sylvan character and appearance.

2.5 Immediately to the south of the car park is the clubhouse, which is an L-shaped, single-storey, brick walled and concrete tile building, with a number of uPVC windows and doors on each elevation. It is a relatively modern building, which was built in the late 1960's and subsequently extended in the early 1970's.

2.6 The remainder of the site comprises some of the holes within the 18-hole golf course, including all of the 1st and 18th holes and part of the 2nd, 3rd, 4th and 17th holes, the remainder of which extend into SODC. Each of the holes are characterised by long, open spaces interspersed with trees and shrubs. The land is gently-sloping and undulating, with some of the greens adjoined by sand filled bunkers.

2.7 To the south-east of the site is Lyefield Court and The Conifers, which is a small development of 2-storey, retirement cottages and apartments, accessed by a cul-de-sac from Kidmore End Road. Slightly further west of this development lies Brindles, a significant detached dwelling which abuts the site boundary adjacent to the current practice range. The boundary with the golf club in this location features strong, well-established hedging and is also relatively tree-lined, so that there is an existing, robust green buffer between RGC and the retirement properties and other dwellings.

2.8 To the south of the site is Emmer Green Primary School, which consists of predominantly single-storey height, relatively modern buildings in its southern part, with the school playing field adjoining RGC to the north and adjacent to the western boundary of the practice range. There is a strong wooded and hedged boundary between the Primary School, its playing fields and RGC.

2.9 Along the western boundary of RGC, there are a number of residential properties in Highdown Hill Road, Eric Avenue and Gorselands. The properties backing onto RGC are a mix of 2-storey and single-storey detached houses and bungalows, which each have their own front and rear gardens. Most of the properties, especially along the western boundary, have dense tree and/or hedgerow buffers between themselves and RGC.

2.10 The northern boundary of the site has been drawn across the Golf Course, to link properties in Highdown Hill Road to the west, with properties in Brooklyn Drive to the east, following the line of the boundary between Reading Borough Council (RBC) to the south and South Oxfordshire District Council (SODC) to the north.

2.11 To the north and east of the site are residential properties in Brooklyn Drive. This road contains low-density, detached two-storey houses with their own front and rear gardens, private driveways and garages. There are a few small street trees, but the majority of the rear gardens, which back onto the Golf Course, have existing green buffers consisting of trees, hedgerows and shrubs.

2.12 Overall, the Golf Course lies in a sylvan, low to medium density, suburban location, where it is adjoined, in the main, by detached houses and bungalows with large verdant gardens, which have reasonable levels of screening along their boundaries.

2.13 The site lies within each reach of a range of services and facilities, including the following:

- Emmer Green Recreation Ground
- Emmer Green Playing Fields
- Emmer Green Allotments
- Emmer Green Primary School
- Emmer Green Surgery
- St Barnabas Church
- The Black Horse Public House
- Village Tandoori

- White Horse Public House
- Aphrodite's Beauty Salon
- The Cutting Edge Hairdressing Salon
- Coral Bookmakers
- Emmer Green Shops, including Budgens Supermarket, Lloyds Pharmacy, Martins, V & I Hardware, The Master Fryer, Domino's Pizza, Raj Tandoori, Turkish Grill and Emmer Green Post Office
- Highdown School and Sixth Form Centre
- Highdown Sport and Leisure Centre

2.14 The site is also close to several bus stops and is served by several regular Reading Buses services, including the following:

- 23 berry – to and from Reading Town Centre via Caversham (every 30-60 minutes)
- 24 berry - to and from Reading Town Centre via Caversham (every 30-60 minutes)
- 25 pink – to and from Peppard Common and Reading Town Centre (every 60 minutes)

2.15 Reading Railway Station is situated a little under 4 kilometres to the south of the site. Caversham Local Centre is about 2 kilometres to the south of the site. Reading Town Centre is also about 4 kilometres to the south of the site.

2.16 More detail concerning the accessibility of the site to facilities and services is contained in the Transport Statement, which is submitted with this planning application.

2.17 Overall, the site lies in a reasonably sustainable and accessible location, within easy reach of a reasonable range of local facilities, as well as good public transport links with the rest of Reading and the Town Centre.

3. PLANNING HISTORY

3.1 Reference to 'The Story of the First Hundred Years of Reading Golf Club' by Michael Tierney, supported by notable contributions by a number of local residents and representative associations, identifies that the first plans to create the club were reported in the Berkshire Chronicle editions of 3rd and 10th April 1909.

3.2 Works to complete the course and purchase additional land were undertaken over the next few years, all of which significantly pre-dated the Town and Country Planning Act 1947, which came into effect on 1 July 1948.

3.3 Following the destruction of the original clubhouse by fire in the 1960's, the current clubhouse received planning permission in 1967 and was subsequently built out in the late 1960's and early 1970's.

3.4 There is little recent planning history, save for that associated with the recent Local Plan process. Review of the Council's online records, however, identifies the following applications of note:

<u>Application 940383</u>

Proposed gate and fencing. Permitted on 21st September 1995.

<u>Application 161871</u>

Re-pollard 2 lime trees (T1 and T2). Permitted 11th October 2016.

<u>Application 181992</u>

Cut back one oak overhanging 3 Gorselands from the Golf Course to give 6.5m clearance from property. Permitted 9th January 2019.

<u>Application 200229</u>

Request for Scoping Opinion. Submitted 9th March 2020. Advice from RBC Officers and statutory consultees provided between April and May 2020, the detail of which has informed our approach to EIA and the planning assessment.

4. THE DEVELOPMENT PROPOSALS IN THE CONTEXT OF THE LOCAL PLAN

4.1 Since submission of the 'Response to Issue 13' representations on behalf of Wates Developments Ltd and RGC in October 2018, there have been a number of fundamental changes to golf club operations. It is considered appropriate to set these out as policy-making positions taken during the Local Plan process were (in our opinion) made in the context of the golf club staying in its current location, this no longer being the case, although it is pertinent to note that this is also as formally stated by RGC in response to the Main Modifications stage of the Local Plan in July 2019.

4.2 To provide the basis of changes made since the October 2018 Issue 13 submission to the Local Plan process:

- The chosen development partner has changed from Wates Developments Ltd (Wates) to Fairfax
- The initial club identified for purchase changed for reasons outside of RGC's control and accordingly RGC completed on a long lease for another club; Caversham Heath Golf Club (CHGC)

4.3 In both instances, the changes that occurred have had implications for strategy and hence our response made below is made in this context.

Change in Development Partner

4.4 Whilst it is not pertinent to explain the full details of the changes from Wates to Fairfax for the basis of this submission, the outcome of this change, which was progressed by RGC in order to gain certainty regarding the purchase of CHGC (see further detail below), is that there was significantly less upfront money available to RGC than as originally envisaged and forming part of the rationale for retaining family golf operations on site as set out within earlier Local Plan submissions; essentially the change from Wates to Fairfax only provided the funding necessary to purchase CHGC and undertake the clubhouse and course changes at that location. Unlike the earlier Wates deal, no substantial monies were left to maintain retained golfing operations[1].

4.5 The change in development partner has, however, given certainty to RGC to enable it to plan for its future and the long lease and planned rejuvenation of CHGC, which is discussed in more detail in later sections, therefore forms the first

[1] This detail can be provided on a confidential basis to the Council to corroborate decisions taken

step in providing a significantly enhanced golfing offer, for all ages and standards, being delivered for the benefit of the local area in line with policy aspirations.

Change in identified Golf Club

4.6 Following on from that above, and perhaps more importantly, it was not fully known which golf club RGC would move to at the time of the Response to Issue 13 submissions. Significant progress had been made with another Golf Club (the other Golf Club), the detail of which can be provided but is not placed in the public domain on grounds of confidentiality[2], to the point where Heads of Terms were being drafted and it was on this basis that decisions regarding future golf provision both at RGC and the potential new venue were formed.

4.7 In respect of the other golf club, it was understood that as a golfing destination it did not have the space available to provide 'family golf' facilities, hence the decision was made to show this at RGC, as ability to attract youngsters and a family-base was central to the golf club's long-term plans and, at the time of submission, there were additional funds to be made available through Wates purchase to enable this position to be maintained alongside operations elsewhere.

4.8 Discussions to purchase the other golf club were ceased by that party at a late stage of negotiations and for a period of time between Issue 13 and Main Modifications Local Plan submissions, RGC had no options available in terms of moving forward with its plans.

4.9 CHGC subsequently came forward as a destination for the move, with a long lease being secured in 2019. CHGC is a very different course to the other Golf Club, the key aspects being the space available on-site, the relative proximity to RGC, which alongside the fact that it has implemented consent for a further 18 golfing holes provides greater ability to provide all necessary facilities for the benefit of the local area within one site. The change in circumstances therefore provided opportunity to implement something materially different which is advantageous in terms of golfing provision to that initially envisaged.

4.10 The intent is now two-fold:

- At CHGC an academy/golf sixes course will be provided to encourage young players and new starters, with this, alongside a new practice range,

[2] As above

improvements to the clubhouse, course playability and to putting and chipping greens, enabling year-round facilities to meet the requirements of all entry-levels and standard of golfers. The proposals at CHGC sit within the parameters set by the implemented planning consent for 36 holes on site but feature significantly lower land take and will be progressed in a sensitive and sympathetic manner.

- At RGC a more fun-orientated, short, quick and diverse sports format comprising short game golf, foot golf and disc golf is intended to create a small amount of turnover to enable management and maintenance of this land, whilst not competing with the more formalised, practice and competition-based activities at CHGC. It is intended that the family facility, which will be called 'Reading Family Golf Centre', will utilise the current car park by the 7th hole, using a booking slot basis for games. As the short game golf, foot golf and disc golf essentially use the same holes, from tee to green, only one format can be played per hole at any one time. Accordingly, the level of activity will be low and controlled and SODC has determined that planning permission is not required for such activities. The consequence of this approach is that the facility will not generate the substantial funds necessary for management of other parts of the land outside of the Policy CA1b allocation. Instead, it is intended to appropriately manage other golf club land through provision of much-needed housing within RBC, with a service charge placed on residential development to look after the other open spaces in SODC.

4.11 Pre-application discussions with SODC have been undertaken and initial support for the wider proposals has been shown. In this regard, planning permission is not required for the proposed works at RGC. Planning applications for the clubhouse changes and for a new putting green and 18th green at CHGC have been submitted and recently consented, refs: P20/S1340/FUL and P20/S1619/FUL. Going forward, it is intended to apply to SODC for the practice range and academy/golf sixes course at CHGC over the winter/spring period.

4.12 The approach now being taken is consistent with RGC's stated strategy to encourage wide-ranging participation in the sport, which has been discussed with England Golf and Sport England, culminating in expressions of support for the proposals from these organisations, as identified during the earlier planning application process.

4.13 The approach also forms part of RGC's plans to deliver legacy to Emmer Green in respect of the RGC land and to turn CHGC into a top-level golfing destination with a solid, multi-strand financial base and therefore a long-term future. The changes consented and to be implemented have in this manner enabled RGC to secure hosting of the English Girls Golf Championship in 2023, which will feature players from all over the world. This form of change is crucial to the attraction of the new home of RGC 'The Caversham' and therefore its long-term viability, whilst also playing a central part in the development of a more diverse playing base.

4.14 The future of golf in the United Kingdom is a serious consideration, hence difficult decisions have had to be made by RGC throughout the Local Plan and planning application processes. RGC has, however, been diplomatic and open about its proposals and has informed its members regarding the proposals throughout this process, even though this has enabled local objector groups to campaign against aspects of the proposals that would not normally be in the public domain, something noted by the Council in its own response to Issue 13 during the Local Plan process:

'…The situation with the Golf Club is slightly unusual, in that its decisions are made in consultation with the membership, many of whom are local residents. This means that decisions and discussions that in another organisation would be entirely internal may become widely known before they are formally agreed'.

4.15 This is important to the consideration of RGC's position, as previously it has had to make decisions and place detail into the public domain to meet requests made of it, despite the fact that there was no certainty in place regarding its future, potential alternative locations or funding to enable purchase of these. The changes to development partner and golf club location have now provided certainty and RGC's proposals are therefore deliverable and realistic.

4.16 The impact of this certainty, however, is that changes to the proposals made at the Response to Issue 13 stage have been necessary, the detail forming this application being consistent with that highlighted as part of our response to the Main Modifications consultation of the Local Plan in July 2019. To assist understanding of matters, a summary of the Golf Club's position and rationale for the changes made is provided below.

4.17 Firstly, RGC did not have the financial ability to retain golfing operations at both its current site and at CHGC. A very different set of circumstances to that

envisaged at the Issue 13 stage of the Local Plan now exists. Accordingly, RGC has already publicly stated that it will cease current operations at the Kidmore End Road site by no later than 31st March 2021.

4.18 Secondly, CHGC provides the opportunity to encapsulate a wide-ranging offer that meets RGC's stated strategy in terms of encouraging more participants to the sport. Retention of similar operations at RGC and CHGC, which is only 1.7 miles door to door or 800m from course edge to course edge as shown in Figure 2 overleaf, would undermine each other's viability as the operations would create unnecessary competition, this being much of the basis for the decline of the RGC in recent years. As such, the intent is to develop a 'family-based' offer only at RGC, which has a different focus in terms of likely users, with this located in the northern part of the SODC land adjacent to Chalkhouse Green and extending west down towards Bugs Bottom. The latest Community Infrastructure Plan, Rev. H, evidences this.

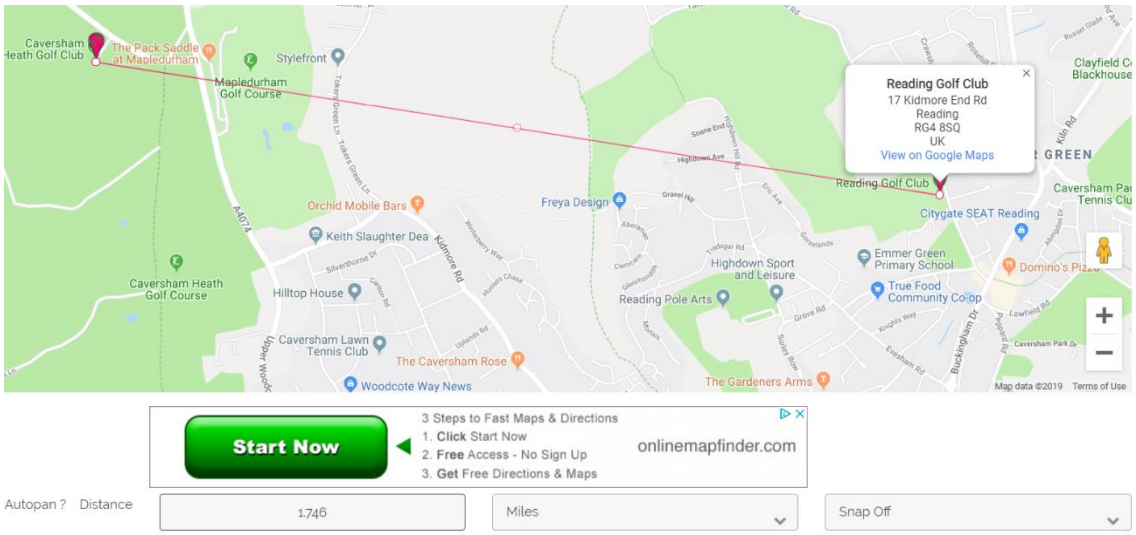


Figure 2 – Distance (miles) between RGC and SODC clubhouse locations

4.19 Thirdly, RGC has committed to a significant release of land within its landholding (both RBC and SODC) to:

- Provide a new c. 3ha parkland for local use;
- Provide c. 0.4 ha of land for new allotments to meet identified local need, which on the basis of a standard 250 sq.m pitch will allow for provision of c. 16 new allotments;

- Enable greater walking and cycling connectivity between Emmer Green, Caversham and beyond through provision of new accesses and paths throughout the landholding;
- Provide c. 1.1 ha of land for woodland planting to ensure a net gain of over 1,000 trees;
- Provide policy-compliant open and play spaces within the red line site area;
- In addition, a new 600m^2 health centre is proposed, as are contributions towards local playing fields and facilities.

4.20 Fourthly, ongoing world events have shown that a precarious financial position and inability to adapt to change, inevitably lead to the failure of enterprises such as RGC. Indeed, the lack of subscriptions and other income received by Golf Club's due to the lockdowns caused by the coronavirus pandemic, will have profound implications for the longevity of many clubs; the actual cost of lockdown in lost membership fees and revenue to RGC and CHGC to end May 2020 was in the region of £155,000 - £160,000, which followed a very tough winter business-wise due to the weather. It is likely that a similar loss will be incurred in respect of the latest January 2021 lockdown. Against this, RGC has sought to control its future allowing it to move forward in what would otherwise be very difficult economic circumstances.

4.21 Fifthly, in line with the above, the benefit of opening up green space to the local community has been well-catalogued during the coronavirus pandemic. The proposals, which are set out in more detail in Section 6, enable significantly greater public access to some of this resource, providing greater connectivity for walking, cycling and enjoyment of the environment to the residents of Emmer Green and Caversham. Access to the course is otherwise limited to golf club members.

4.22 Finally, the context of decisions made by RGC during this process is highly pertinent. Whilst much has been made of the state and causes of RGC's financial position, the facts are clear – golf in general is in a state of decline, the details of which are set out in the following section. As part of this wider industry situation, the club's future was under threat financially in 2016/17 and plans were needing to be made. That is why RGC took the decision some 18 months ago to merge with CHGC; both clubs were losing money, were unsustainable and facing closure.

That decision has been enacted and contracts (with Fairfax and Mapledurham Estates) have been signed. The fact is that RGC is committed, morally, financially and legally, to vacate their current site in March 2021, regardless of any planning considerations, and all golf activity will cease on the Emmer Green site from that date. Therefore, the decision now facing planning decision-makers is not choosing between a failing golf operation versus a development proposal, it is choosing between a vacant and potentially derelict plot of land versus a development proposal.

4.23 Taking into account the above, it is clear that the scheme has had to adapt, several times, to factors outside of its control. The project however has evolved with RGC seeking to maintain its commitment to a strong local legacy and in this regard it is considered that a robust, joined-up and beneficial position has been reached; the additional housing allows myriad benefits including delivery of acute affordable family need, delivery of a health centre that would most likely otherwise not be able to come forward given lack of available CCG funding, significantly more publicly accessible open land release and a range of environmental, ecological and leisure benefits associated with the allotments, parkland, footpaths/cycleways and tree planting proposed.

4.24 RGC wishes to ensure that Emmer Green is left with an appropriate, well-considered, well managed and sustainable legacy that benefits the wider community and the plans submitted evidence a strong desire to deliver on this basis.

5. THE STATE OF GOLF AND PRECEDENTS FOR SIMILAR DEVELOPMENT

5.1 Golf club membership across the UK has been falling in recent years. KPMG's Golf Participation Report for Europe 2019 makes concerning reading for the home unions, with all four showing a decline in the number of registered golfers between 2017 and 2018. In terms of the number of players, England has suffered the highest fall in Europe with more than 10,500 players having given up membership.

5.2 Following a boom in the latter part of the 20th century, the UK and Ireland has a huge concentration of golf facilities per capita. While an increasing number of people wanted to play golf there was an increasing demand for facilities. This, however, has created a position when, at a time when fewer people are playing outdoor sports in general, that there is now a surplus of golf facilities and insufficient investment from the golf-playing public to keep them all afloat.

5.3 When a club or facility is run with the objective of making money for the owners, then it will be quicker to close its doors when this is not happening. In the case of RGC, however, which is member-owned, there is a real and meaningful intent to seek a means to retain the Club, which in this case, following significant discussion of numerous alternatives by the Members and during the Local Plan process, means relocation to CHGC.

5.4 Clubs with significant history, such as RGC, have greater links to the surrounding area and its people and it is perhaps therefore not unsurprising that efforts are being made to secure an appropriate and beneficial next chapter in the Golf Club sites history, the detail of which is summarised in paragraph 4.10 and Section 6 of this document, rather than to allow it to eventually fall into disrepair or face fire sale.

5.5 There is a similar pattern of members-owned clubs throughout the local area where the closure of, or alterations to, the golf club buildings and/or course have been proposed in order to enable the development of further income streams, provide enhanced facilities or to merge failing businesses. In this regard, the following development proposals are pertinent to consideration of proposals at the Golf Club:

- Proposed alterations and extension to provide additional accommodation for management and training centre, including 7 bedrooms at Badgemore Park Golf Club;

- Removal of existing buildings and erection of 5no dwelling houses at Badgemore Park Golf Club;
- Change of use from offices (use class B1(A)) to use as a dwelling house at Badgemore Park Golf Club;
- Removal of existing leisure buildings and their replacement with a new purpose-built leisure centre building at Badgemore Park Golf Club
- The reorganisation of tourism facilities to deliver a Spa and Reception building, a replacement green keeper maintenance and laundry building, extension to the existing clubhouse and provision of 43 hotel lodges at The Springs Golf Club, North Stoke.
- Outline application with all matters reserved for demolition of 2 existing dwellings and the erection of up to 8 dwellings at Huntercombe Golf Club
- Outline planning application for the demolition of all existing buildings and removal of existing hardstanding and development of up to 1,000 home (C3), local centre (comprising a community facility (D1 / D2), a day nursery (D1), and local retail uses A1-5), formal and informal open space, sports provision, a Gypsy and Traveller pitch, pedestrian and cycle links, noise barriers, and vehicular access from Winchester Road at Basingstoke Golf Club
- Changes to holes 1, 2, 3, 4 & 5 involving additional mounding and earthworks to match style on newly completed holes 6 to 8 and 10 to 18 enabled by imported fill over a 27-month period at Weybrook Park Golf Club
- Change of use to mixed use to allow non-golf related functions to be held and temporary erection of marquee for functions (10 years) at Test Valley Golf Club
- Erection of a 40 no. bedroomed hotel at Sandford Springs Golf Club
- Provision of up to 30no. dwellings at Newbury and Crookham Golf Club to enable development of new clubhouse facilities

- Two storey extension to health and fitness club building to provide new children's pool at ground floor level with additional gym and club room at Castle Royle Golf Club

- 4 no. buildings to provide hotel accommodation, a function suite, a health club and spa with ancillary facilities; a single storey extension and refurbishment of existing clubhouse including one replacement residential flat; erection of ancillary energy and maintenance building with one additional residential flat; and Greenkeepers compound, plus associated plant, car parking and landscaping at Sand Martins Golf Club

- New high-quality standard greens to be constructed for every hole. New raised level teeing areas for every hole. Landscaping works on Red Course Hole 10, 13 and 17 fairways enabled by imported fill at Greys Green Golf Club.

- Part two and part three storey 120 bedroom care home (Class C2) with visitors lounges/ Dining rooms, day centre and ancillary facilities, parking and access provisions at Bishopswood Golf Club.

5.6 The list above is by no means exhaustive and there are a number of proposals the Golf Club is aware of, including major development in West Berks, Reading and South Oxfordshire that are at pre-application stage or are yet to come forward for planning, but the above proposals do demonstrate a strong desire by clubs to recognise the need to diversify income streams via a number of means. In addition, whilst not yet submitted, it is well catalogued that Maidenhead Golf Club is in the process of being closed down to enable development of up to 2,300 homes on site by the Royal Borough of Windsor and Maidenhead Council.

5.7 RGC's proposals in this regard follow on from that proposed by a number of local golf clubs. In this manner and in view of the current state of golf, which is well catalogued online, it is considered that, in the absence of funding sources to retain golf on site, the proposals for the retention of further open spaces and leisure uses on land land within the Golf Club's ownership to be provided for open-access, public use, alongside the woodlands which are also accessible, is a strong material planning consideration weighing in favour of the proposals, particularly as the failure of the course, something that without intervention would have been accelerated by the coronavirus lockdown and corresponding

impact on club revenues, would have unintended and undesired consequences for all aspects of the community.

5.8 In this regard, it is contended that it is in the wider interests of the area to help identify an acceptable planning solution that enables the longevity of golfing activities as part of a merged club at CHGC and allows for a wide-ranging, beneficial legacy to come forward at the current RGC site. In both cases, the residential, leisure, community infrastructure and open and play spaces identified will in turn create significant economic, social and environmental spin-off benefits for the locality[3].

[3] The Economic Statement submitted with the CHGC clubhouse scheme identifies increases in FTE employment and GVA contribution to the economy when compared to the existing situation at the two sites. In addition, there will be contributions from construction activity, increased income potential from hosting tournaments at CHGC and the significant health and social benefits associated with this scheme. The proposals at RGC also provide significant benefit as discussed in Section 6 of this document.

6. THE DEVELOPMENT PROPOSALS

6.1 This Planning Statement accompanies an outline planning application, with matters reserved in respect of appearance, for demolition of the existing clubhouse and the erection of a new residential-led scheme (C3 use to include affordable housing) and the provision of community infrastructure at Reading Golf Club.

6.2 The RGC redevelopment scheme proposes 257 dwellings, indicatively provided as a range of dwelling types as follows[4]:

Unit Type	**Reading Affordable Rent**	**Affordable Home Ownership**	**Private**	**Total**
1 Bed maisonettes /apartments	6	3	23	32
2 Bed maisonettes /apartments	6	2	18	26
2 bed houses	9	4	27	40
3 Bed houses	16	7	55	78
4 Bed houses	16	8	57	81
Total number of dwellings	**53**	**24**	**180**	**257**

6.3 With regard to cycle parking, a total of 449 cycle spaces will be provided for the dwellings. When a secure facility, such as a store or garage associated within a property cannot be provided, such as within an apartment, dedicated secure cycle parking will be provided. Cycle parking will be provided for the health centre in line with the standards set out in Revised Parking Standards and Design

[4] Affordable provision as defined in the emerging Affordable Housing SPD.

Supplementary Planning Document October 2011. Based on 5 treatment rooms and 10 FTE staff, this equates to 10 cycle parking spaces.

6.4 With regard to car parking, the residential proposal includes 474 car parking spaces and garages, an average of 1.84 spaces per dwelling. Parking will be sited on plot behind building lines, within under-croft spaces, in integrated on-street parking and in parking courts behind building lines. The objective being, to minimise the visual impact of car parking within the development, as much as possible. The Health Centre will be provided with 25 car parking spaces to provide for 10 staff spaces and 15 spaces associated with the treatment rooms for which five are currently assumed on the basis of proposed floorspace.

6.5 The proposed houses will rear gardens of a policy-compliant minimum depth. The apartments will have shared amenity spaces to meet policy requirements. In addition, a significant proportion of the proposed dwellings will overlook or adjoin the areas of public open space, including retained trees and natural features, which will run through the site and make up just over one third of the site area. The

6.6 The site has an overall area of 12.15 hectares. The proposed 257 dwellings equate to a density of 21.15 dwellings per hectare. This is broadly similar to the density of development in the vicinity of the site, which is relatively low-density, as well as being suburban in character and appearance.

6.7 It is important to make the best use of all available land and in this case 4.07 hectares of the site will be used as Public Open Space or for SUDS attenuation. Therefore, the remaining 8.08 hectares of land will be developed at a density of 31.8 dwellings per hectare. This is an acceptable density for a location within an existing suburban location and this density can be achieved with about one third of the site being set aside for use as public open space, with most of the most valuable trees retained and building heights of 2 and 3-storeys, which will be wholly in keeping with the existing character and appearance of the area.

6.8 The location and sizing of open and play spaces has been designed to maximise green spaces, both public and private, at the site edges and within central areas. Providing a majority back-to-back solution with houses on the site perimeter ensures good separation between existing and proposed built form, softened by intervening landscaping and garden spaces, whilst central areas provide a series

of linked green spaces to enable walking, cycling and leisure throughout the site without unacceptable severance by roadways.

6.9 The approach taken enables open and play spaces to be provided in accordance with policy requirements and for the green links envisaged through Policy EN12 to be established on site. As part of this approach, a rear entrance way to Emmer Green Primary School is proposed; this enabling the north-south green link from the local wildlife site (LWS) in the north-east extent of the proposed development area through to Emmer Green Primary School and the Grove Road Allotments.

6.10 As part of the proposals to bring forward 'Community Infrastructure', a new Health Centre with a floor area of c. 600 sqm has been identified on the Kidmore End Road frontage. This will help to meet the existing acute needs of the increasingly ageing population in the local area, as well as that relating to new residents of the proposed development. The land and building (either via financial contributions or to Shell and Core fitout) will be provided by the developer at no cost to the public purse and this can be secured by means of a section 106 agreement between the parties.

6.11 Discussions have taken place with the local NHS Clinical Commissioning Group to identify best use for this building, as well as an appropriate size[5], and it is intended to continue negotiations throughout the planning process to ensure that the healthcare offer in Emmer Green reflects that considered appropriate. In this regard, the proposed health centre is not intended as a replacement for Emmer Green Surgery, but to complement it, helping to meet acute healthcare requirements in the locality.

6.12 The proposals include the provision of a Local Equipped Area of Play (LEAP), which will be incorporated into the most central area of POS within the site.

6.13 The proposals also include a new road layout, including a primary spine road running from Kidmore End Road in the east to the western end of the site. The intent has been to provide a relatively traditional layout, served by a primary route with secondary roads that help to form a legible hierarchy. Cul-de-sacs and private drives with shared surfaces have been minimised but are used where appropriate to provide access to the dwellings that do not front directly onto the spine or secondary roads.

[5] The proposed health centre is slightly larger in size than Emmer Green Surgery, which measures just under 600 sqm in size.

6.14 A secondary access from Kidmore End Road is proposed to serve the health centre and flats above only. It is considered appropriate to split this element from the rest of the development, so that the health centre is relatively contained and also more accessible from the existing public transport network. Access for emergency vehicles, which will be controlled by bollards, will also be provided into the development via this route.

6.15 Primary pedestrian routes will be retained and enhanced, both into and through the site, with high quality landscape proposals enhancing the routes, thus encouraging walking and cycling.

6.16 The footpaths and cycleways will connect the development and existing homes with the proposed Parkland, new Woodland Area, Allotments and other community leisure uses on land to the north of the site, which currently comprises part of the remainder of the Golf Club. Change of use from Golf Club to Parkland, woodland and allotments does not require planning permission, as is the case with the routes proposed within the SODC land.

6.17 The additional commitments within SODC are not considered to be required for the development to proceed in line with NPPF Paragraph 56 tests and are therefore offered voluntarily by the applicant as part of the commitment to provide a sustainable and active legacy on the land to be vacated.

6.18 As the land is to be given on a voluntarily basis and is not required to support the application in planning terms, there is no absolute requirement for such works to form part of a legal agreement with RBC. Nevertheless, in terms of the applicant's commitment to provide a meaningful legacy, it is proposed that the above matters can be controlled via means of legal agreement, whether as a separate document or combined with other obligations. The applicant welcomes discussions with RBC to agree on an acceptable approach in this regard, but our initial thoughts are provided below in this respect.

6.19 In the first instance, it is important to delineate what is included for consideration by RBC as part of the planning application. In this regard, the other uses set out on the Community Infrastructure Plan that are within SODC, such as the foot golf, disc golf, 9-hole short game golf, café and outdoor seating area, are to be progressed separately by the Golf Club (and therefore do not form part of the planning application), and will form part of the new Reading Family Golf Centre, which will provide a much-needed boost to the leisure offer available to families

in the Reading area. These uses are already in the process of being implemented and discussions with SODC Planning Officers have acknowledged that planning permission is not required for the changes proposed. The use of this land is necessary to pay for its long-term upkeep and maintenance and so it is considered that there is a credible plan in place for this land.

6.20 In terms of the 4.4ha of which has been identified to provide parkland, allotments, cycle/walkways and tree planting for the benefit of the residential scheme, it is entirely possible to attach pre-commencement conditions to require implementation of these requirements prior to works commencing on the residential part of the site. The exact timing of such implementation conditions can be agreed as part of negotiations with the Council. Whilst the SODC land would not be within the control of the Council, the residential development would and therefore there would be adequate, enforceable legal control in place to cover this part of the requirements.

6.21 Turning to matters relating to the management and maintenance of the above land, it is considered that a management company could be put in place with financial cover for ongoing upkeep being secured by means of a service charge on residents within the new scheme. This element would be self-enforceable in that residents within the new development would hold control over any management company should any cases arise where the open space land in SODC is not properly maintained. This is an appropriate means of ensuring work is undertaken and several of the flatted schemes in Reading operate on this basis. It is also credible in that the attractiveness of the open space, and also value to the residents, social and economic, is intrinsically linked to the aesthetics of the open space and therefore the upkeep of this land.

6.22 If further certainty is provided, the appropriate percentage of monies from the service charge attributable to the open spaces is provided by the Management Company to RBC each year, with this being released either back to the Management Company or an identified third party to undertake works; possibly to RBC Parks and Gardens. This would ensure that the Council retains sufficient enforcement power to ensure that work is undertaken on an ongoing, satisfactory basis. The self-enforcing nature of the residents' service charge payment, and therefore expectation that work will be undertaken, would ensure it is not to any parties benefit not to accord with agreements.

6.23 As a fallback position, given that it is inherently more responsible to control all planning matters via one authority, discussions could be progressed with SODC to identify the parties responsible for management and maintenance of this land. It is expected that a similar arrangement to that above would be put in place, i.e. a service charge and third-party management. The only difference would be in the enforcement position, which given the measures that can be put in place is considered unnecessary in this instance.

6.24 It is anticipated that charges for use of the allotments, to be retained in line with that paid for use of the RBC allotments as set out at https://www.reading.gov.uk/allotments, will also provide ringfenced contributions towards upkeep of this aspect of the facilities.

6.25 Further, the scheme will include contributions, as part of a section 106 agreement, towards improvements to Emmer Green Playing Fields and existing children's play facilities (MUGA). More detail on the full set of proposed commitments is set out in the Planning Obligations Statement supporting this application.

6.26 The proposals have been developed to respond to the surrounding context and feedback received at the consultation stage, including from RBC Officers and Members, local residents, Design South East and Sport England amongst others. Details of the public-facing engagement are set out in the Statement of Community Involvement, which is submitted with this planning application.

7. SUMMARY OF PROPOSALS AT CAVERSHAM HEATH GOLF CLUB

7.1 The proposals for land at RGC set out in the earlier section represent part of an over-arching approach to retain the golf club and provide a lasting and meaningful legacy within the local area. As part of this process, RGC will close its doors and cease golfing operations on 31 March 2021, with RGC continuing as part of a merged club with CHGC.

7.2 The plans at CHGC, which RGC acquired CHGC in 2019 are to provide enhanced, more accessible and diverse golfing opportunities within the local area and planning applications have already been consented for the following:

1. Refurbishment and extension of the CHGC Clubhouse to provide a much higher quality offering, including improved external seating areas, expanded golf retail operations, new office spaces, health, well-being and fitness facilities, ref: P20/S1619/FUL.

2. Provision of a new 18th hole and practice putting green, including levelling work and new bunkers, ref: P20/S1340/FUL.

7.3 Further applications for provision of a golf sixes/academy course, plus a new practice range to assist with training of new starters and to appeal to a range of golfing abilities are also in the process of being progressed and applications are anticipated over the winter/spring period.

7.4 A summary of the proposals and supporting rationale is provided below:

- There will be an exterior terrace to make best use of the tremendous views across the course and beyond and to enable members and visitors to stay and enjoy the food and beverage offer.

- A large pro-shop which will incorporate a dedicated club fitting area and the simulator facility to help provide the very best expertise and experience for users.

- The loft space will be converted into a large, accessible function space and a meeting room available for hire, which will display items from the club's history. This area will also include an office.

- Regarding the loft space in the new clubhouse, a lease has been agreed to a Health and Wellbeing company. Clean Well-Being and Massage Works

will be offering a range of treatments including Pilates and Yoga classes for members from their new business venture "Well-Being in the Loft".

- The new clubhouse will incorporate a small gym comprising both aerobic and resistance equipment, specifically designed with the golfer in mind.
- There will also be a dedicated junior lounge/clubroom area within the new clubhouse, which in tandem with the academy course will help further develop the attractiveness of golf to a younger audience.
- The restaurant and bar area will be offering service from 8.00am daily for breakfast, lunch, snacks and meals.
- There will be a large function suite at ground floor level which can be partitioned to offer facilities of a size to suit many different groups. This will produce valuable revenue from what currently is a grossly underutilised facility.
- There will also be a member dedicated area, and patio area, exclusively for the use of our members and their guests, so as not to disturb the primary purpose of the club which is to be a golf club.

7.5 The plans for CHGC therefore allow RGC to rebuild its playing base. RGC has been very active with the Golf Foundation being a lead player in developing the successful Golf Sixes Programme. Alongside this, and as set out above, has been RGC's participation in Girls Golf Rocks, introducing golf to young girls, which is amongst the most successful in the country in terms of converting participants into club members. All Juniors are also offered free of charge group coaching weekly plus an individual lesson per month free of charge, unique in the golf club world. Further, Joe Templer, Head Professional, teaches golf in three local schools and discussions have already taken place for the new Academy/Golf Sixes Course, once consented and built on site, to become a golf development centre for many schools, something RGC is committed to.

7.6 RGC also sees the academy/golf sixes course as being perfect to enable access to golf by groups such as blind golfers. Joe Templer works weekly with Colin Chandler "The Blind Golfer" who is very active on social media and with improved facilities he is looking to expand this to involve a group Colin is involved with. RGC is also currently working on a charity day involving Colin and one of his causes.

7.7 Allied to this, the health and wellbeing offer, to be operated by Massage Works and Clean Well-Being will offer a number of holistic treatments, pilates and yoga classes and training courses on Health & Wellbeing, enabling a more comprehensive and diverse leisure offer to come forward; one that will benefit young and old, men and women. Both of the above companies have previously worked with Reading Borough Council in education, particularly together implementing the Healthy Schools Programme.

7.8 The CHGC proposals are therefore about much more than golf; they are about providing a next generation facility that is more financially robust and durable, which also provides for significant local economic and social benefit.

7.9 Although CHGC is in a neighbouring LPA area (SODC), it is important to note that it lies in close proximity from RGC and improvements to this club will be going ahead, so that members of RGC can move across seamlessly and continue to enjoy their sport locally.

7.10 The overall package of works at RGC and CHGC help to offer substantially more local benefit, not only in terms of sport, but provision of community infrastructure and opportunity to use and enjoy the enhanced amenities offered through both sites.

7.11 In this manner, the proposals provide substantial, enhanced social and economic benefit. This being perhaps best recognised by the decision of England Golf to host the Girls Championship there in 2023, which will comprise a field of 144 players, drawn from approximately 15 different countries and so will lead to significantly more local spend and international recognition in the run-up to and during the tournament.

7.12 RGC is therefore proud of the legacy it wishes to promote and its commitment to the locality is therefore set out in the following section.

8. RGC'S COMMITMENT

8.1 The proposals reflect RGC's desire to provide an appropriate and sustainable legacy for its site in Emmer Green, as well as the enhanced opportunity for enjoyment of sport and physical activity locally.

8.2 The proposals submitted reflect the culmination of a process that commenced in 2015 with the first of many submissions to the Local Plan process. During this time, there have been significant influences, both internal and external to RGC, that have made it necessary to amend the proposals, the principal detail of which is set out earlier in this document.

8.3 Throughout the process, however, RGC has been consistent in its desire not to simply sell on the site and walk away, but to work with a responsible development partner and to refine its plans through engagement with local decision-makers, statutory consultees, Residents Associations and members of the public. This formal process began with the Local Plan and has carried on via submissions for development proposals to RBC from June 2019 onwards.

8.4 The proposals have been further evaluated following the February 2019 Public Exhibition and consultation with Design South East and Sport England. Key in terms of responses received was for infrastructure and services to be prioritised. As such, we have chosen to determine how best to follow Sport England's *'Active Design'* guidance, as a core part of the development philosophy has been to provide the wider public in Emmer Green with more health, well-being and leisure benefit. The central tenets of our approach are set out below:

- *Activity for all:* The proposals at RGC will enable greater access to land within RGC and ensure that existing and new residents in Emmer Green and Caversham beyond have greater opportunity to undertake sport and physical activity. As part of this approach, it is proposed to provide contributions to RBC to upgrade the playing facilities at Emmer Green Recreation Ground, which in line with stated RBC policy could provide for an accessible playspace in the Borough. Contributions towards MUGA provision, which as stated in Sport England pre-application advice could be used for 3G pitch provision in the locality, also assist with this aspiration.

- *Walkable communities:* The proposals provide for a missing link in North Reading, providing access to dedicated open and play spaces and allotments that can be used by all. Proposals to connect all spaces by

footpaths and cycleways, rather than roads, is consistent with the Council's emerging Transport Strategy 2036 and allows for greater connectivity and therefore usability by the community, both existing and new residents. Proposals to connect the development site with Highdown Hill Road, Kidmore End Road (north and south) and to the rear of Emmer Green Primary School will enable more opportunity for movement around the area by means other than the private motor car.

- *Connected walking and cycling routes:* A legible network of walking and cycling routes is proposed, with additional paths within SODC proposed to best integrate the existing PROW and National Cycle Network (NCN) routes with the development and through the development to the existing built-up area. Currently there is little opportunity for walking and cycling outside of the existing street network between Caversham and Emmer Green and therefore provision of links to the PROW and NCN network, and enabling a link from Kidmore End Road to Bugs Bottom, allows for significantly greater opportunity for physical activity, leisure and enjoyment of nature. Routes within the development site will accord with active design principles, but routes to the north of Cucumber Wood are proposed to be less formalised and not lit to ensure that existing ecology is respected and protected.

- *Co-location of community facilities:* it is proposed to provide one of Reading's largest health centres at the site frontage, this being in close proximity to the local Primary School, access to which is proposed to be enhanced through provision of a rear access point, Emmer Green Recreation Ground and local amenities at Emmer Green centre. Depending on the amount of floorspace identified as required by the local NHS Clinical Commissioning Group, there is potential for additional space to be provided as a community room/space for hire.

- *Network of multifunctional open space:* Land is provided within the development site and SODC which, together with proposed financial contributions to RBC, meets all specified Sport England aspirations in terms of providing a network of multifunctional open space to support a range of activities including sport, recreation and play, plus other landscape features including Sustainable Drainage Systems (SuDS), woodland, wildlife habitat and productive landscapes (allotments, orchards).

- *High quality streets and spaces:* following Design South East and RBC advice, the health centre has been moved to the Kidmore End Road frontage to improve legibility. In tandem with adopting a more traditional street design that is in keeping with the surrounding area, a scheme that can clearly delineate primary and secondary streets, open and play spaces and walking and cycling routes has been able to emerge.

- *Appropriate infrastructure:* A cohesive, multi-site approach has been progressed to ensure that opportunities for sport and physical activity are optimised within the development site, within RGC land in SODC, at CHGC and via financial contributions to RBC to improve existing facilities and implement others. The overall contribution to improvement of sport, including opportunities for physical activity, health and well-being services and provision of more diverse and accessible forms of golf at CHGC, as set out above and in sections 6 and 7, identifies a very significant desire to provide sport for all.

- *Active buildings:* whilst the application is within outline, the provision of mainly housing, with spacious back gardens, and flatted accommodation with self-contained amenity spaces will enable opportunities for private activity. Houses and flats will be built to or in excess of Nationally Described Space Standards (NDSS) providing opportunity for inside exercise. In addition, the site layout is well-connected in terms of access to open and play spaces and the walking and cycling network.

- *Management, maintenance, monitoring and evaluation (MMME):* All spaces within the development site will be subject to legal agreement to ensure the active management and maintenance of facilities and public spaces. Where contributions are provided to RBC, the Council will be responsible for this aspect of MMME. With regards to the uses within the SODC land, it is proposed that a legal agreement is entered into that would either see this land managed and maintained by Kidmore End Parish Council or, more likely, via Private Management Company in perpetuity.

- *Activity promotion and local champions:* The proposals at RGC and CHGC promote the importance of participation in sport and physical activity as a means of improving health and well-being. RGC has been a local champion, offering free training to juniors, promoting girls and disability sport and the move to CHGC represents a step-change improvement in

this offer. The provision of a direct health and well-being offer at CHGC helps to further evidence this intent.

8.5 For the reasons given above, it is considered that RGC has endeavoured to achieve Sport England's Ten Principles of Active Design as part of its wider approach. A number of these commitments are shown visually within planning drawing no. P19-2877_01 Rev H, Community Infrastructure Plan.

8.6 Our considerations in respect of how the proposals also accord with RBC planning policy are set out in the section below.

Figure 3 – Sport England – The Ten Principles of Active Design

9. PLANNING POLICY ASSESSMENT

9.1 This section will assess the proposal against relevant planning policy. First, the Development Plan for Reading Borough Council will be considered, followed by other material considerations. Such an approach is consistent with planning law, which requires planning applications to be determined in accordance with the Development Plan, unless material considerations indicate otherwise.

9.2 The development plan for Reading Borough consists of the:

- *Reading Borough Local Plan - adopted 4th November 2019 (RBLP)*

9.3 Material considerations in this instance consist of:

- *The NPPF*
- *Supplementary Planning Documents (SPD's)*

9.4 This report will now consider each of the key planning issues in relation to the proposed development in the context of the relevant development plan policies and material considerations.

Principle of Development

9.5 Policy CC1 of the RBLP *Presumption in Favour of Sustainable Development* states that:

"A positive approach to considering development proposals will be taken that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework (NPPF). Where appropriate, the Council will work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible.

Planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. Planning applications that accord with the policies in the development plan (including, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise. Proposed development that conflicts with the development plan will be refused, unless other material considerations indicate otherwise".

9.6 This policy makes it clear that proposals for sustainable development that accord with adopted development plan policies should be approved without delay. Where schemes do not accord with adopted development plan policies they should be refused unless material considerations indicate otherwise.

9.7 In consideration of the merits of the application, it is also important to note that:

1. The land is not 'countryside', it is a golf course in terms of use definition.
2. The site is located within the Reading settlement boundary as defined in earlier Local Plans, now Borough boundary;
3. The site mainly comprises white land in the Local Plan proposals map, save for the Policy CA1b allocation and Policy EN12 which will be delivered by the proposals;
4. The residential land surrounding the golf club was built after the course, therefore the green land that benefits the area was not part of the planning for it, indeed it could be successfully argued that the existence of the golf club precluded development up to the Borough boundary in this location.

9.8 In this case, it will be explained below that it is considered that there are material considerations, which outweigh potential policy objections and are significantly robust and therefore sufficiently persuasive to enable the LPA to grant planning permission.

9.9 Policy EN8 of the RBLP *Undesignated Open Space* states that:

"There will be a presumption in favour of retention of undesignated open space, which will include allotments. Development should not result in the loss of or jeopardise use and enjoyment of undesignated open space. Development may be permitted where it is clearly demonstrated that replacement open space, of a similar standard and function, can be provided at an accessible location close by, or that improvements to recreational facilities on remaining open space can be provided to a level sufficient to outweigh the loss of the open space".

9.10 Taking the thrust of policy for what it is, it is clear that the three key criteria requiring assessment are loss, use and enjoyment of the 'open space'. Taking each in turn:

- Loss – it is evident that there will be a loss of undesignated open space associated with the proposals. Against this, there will be an increase in accessible and usable public open space.

  Looking at the detail for the purposes of assessment, the development site comprises 12.15ha of land, of which 11.44ha is not currently built upon. The scheme proposals identify 3.51ha of public open space to be provided, which will include a Local Area of Play. A further 0.49ha of SUDS is also provided on site, as is 0.07ha of street planting and 3.45ha of green space associated with front and back gardens. Based on a simple loss consideration, and taking the aggregate of the above into account, there will be 3.92ha of undesignated open space lost as part of the project. Against this, however, more than 4ha of land will become publicly accessible, for the first time, on a permanent basis. This land will not only provide opportunity for relaxation and play, but will also act as a green corridor, linking the site to South Oxfordshire and enabling more active pursuits and greater connectivity between existing residential parcels in the locality. Drawing number D2743_102 Rev 03, reproduced as Figure 10 later in this document, identifies the composition of built form and open spaces proposed throughout the site.

  It is also important to recognise that the SUDS areas and garden spaces will be more ecological diverse and therefore beneficial than the relatively benign golf course they will replace – plants, hedges, shrubs and trees will be planted by occupants, whilst fairways and rough are regularly mown. In addition, relatively continuous golfing play, even in some of the more remote locations within the course, acts against habitation of the areas 'in play' as golfers hit and retrieve golf balls throughout the course of each day.

  Whilst much has been made of the 'loss of open space' by some locals, it is perhaps somewhat ironic that the existing open space deficiency in the area relates to the very composition of street patterns in which residents currently live. Review of an area satellite map, as reproduced overleaf as Figure 5, evidences a street pattern dominated by houses and streets. Green spaces are in this manner confined to front and rear gardens or larger spaces such as Bugs Bottom, Clayfield Copse and Emmer Green Playing Fields which can often be outside of the 400m desired buffer for pedestrian access to such spaces. The proposals at the Golf Club provide

assistance to the Council's Open Space Strategy in this manner in that it will offer more opportunity for residents to benefit from access to public open space, as well as helping to better link existing green spaces, providing opportunity to walk and cycle from Emmer Green Playing Fields to Bugs Bottom through the golf club land without having to cross a classified or primary residential street.

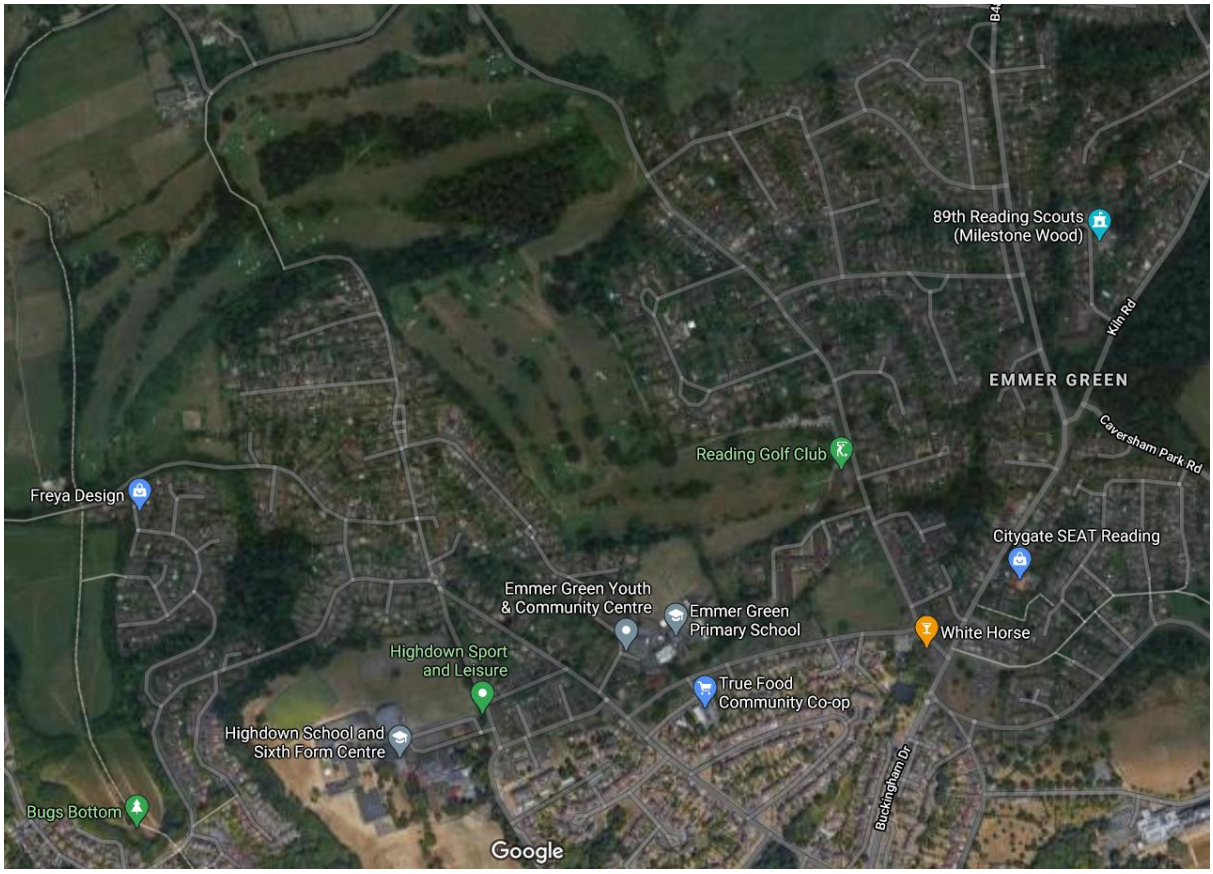


Figure 5 – Satellite map showing lack of open spaces directly accessible to most existing urban streets

<u>Use</u> - In terms of use, the accessibility of the site is a strong material consideration that requires significant weight to be attached in terms of decision-making; a site that is inaccessible has limited use. This rationale is strongly supported by the Council's own assessments of the land; The Reading Open Spaces Strategy 2007 identifies the land as 'limited', as demonstrated in Figure 2.1. of this document, which is reproduced overleaf.

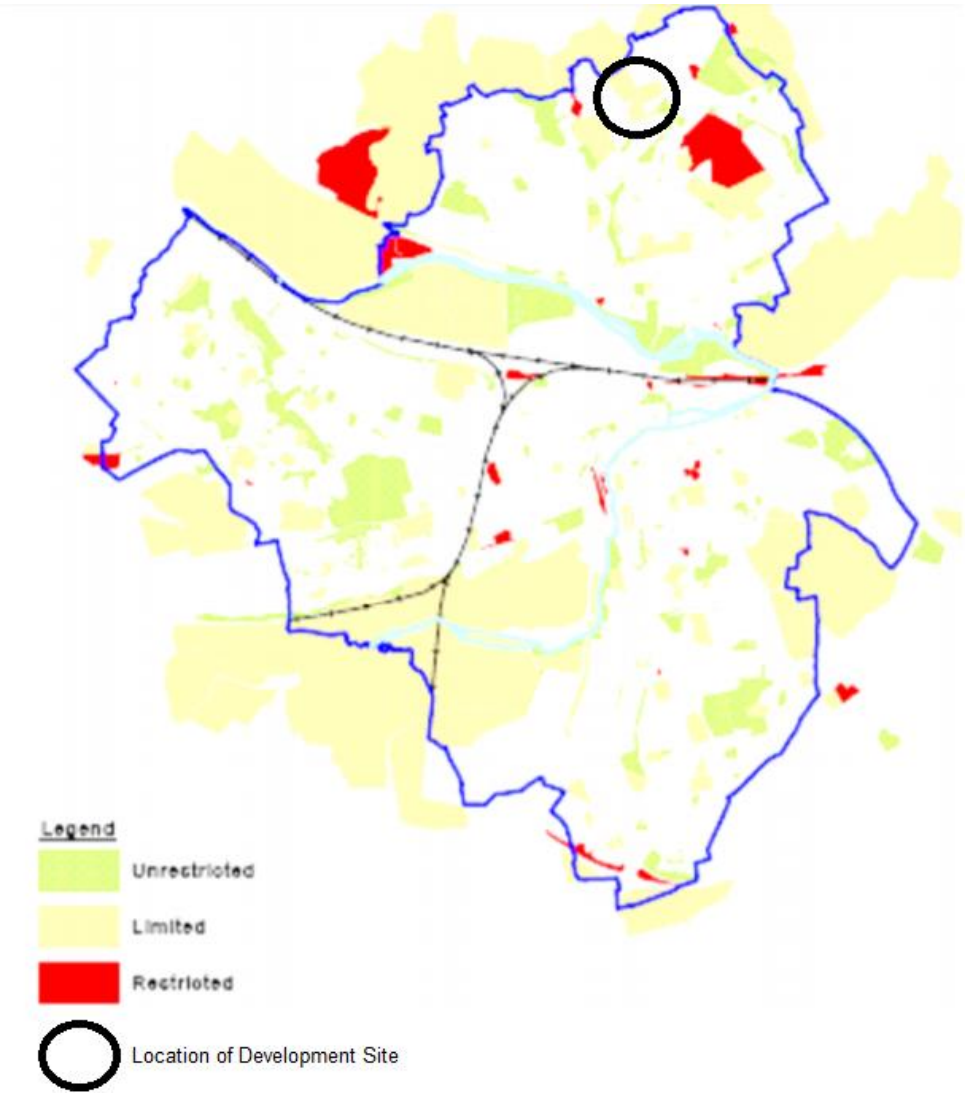


Figure 6 – Reproduction of Figure 2.1 RBC Open Spaces Strategy, 2007

It is also notable, but not entirely unexpected, that Reading Golf Club is not counted within Reading's Open Space calculations. Assessment of the benefit provided by potential Public Open Space (POS) and Local Green Space (LGS) within the Borough was thoroughly assessed as part of the Local Plan process within the EV033 Local Green Space and Public Open Space Background Paper[6]. The land at Reading Golf Club was discounted as both POS and LGS, the latter of these potential designations being that "designated for their value to a local community" (paragraph 5.2.1, EV033 Background Paper). An extract from EV033 to set out the rationale for non-inclusion of this space as designated POS or LGS is set out overleaf, with accessibility identified as a key factor:

[6] EV033 paras 5.2.1 to 5.2.4 (sic)

Sites considered, but not designated POS or LGS:

Site name	Is it an extensive tract of land?	Is it local in character and in proximity to the community it serves?	Particular local significance					Ward	Is it demonstrably special to the local community?	Recommendation
			Beauty	Historic significance	Recreational value	Tranquillity	Wildlife			
Reading Golf Course	No	Yes	Yes	No	Yes	No	Yes	Peppard	Yes	Does not meet the requirements of POS or LGS designation - The golf course is not accessible to the wider public.

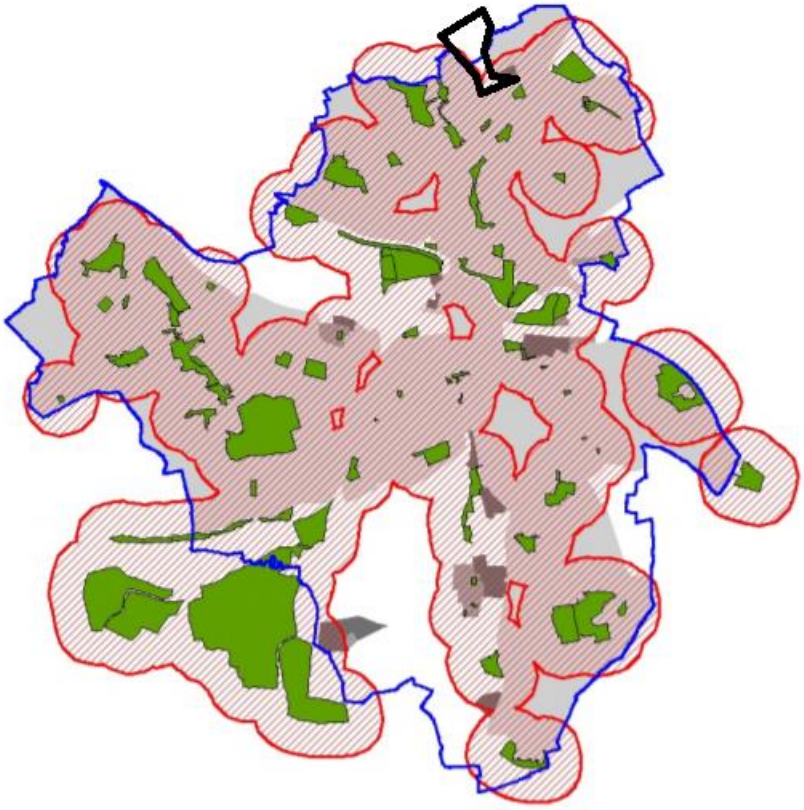
Figure 7 - Reproduction of extract from RBC EV033 Local Green Space and Public Open Space

Considering the EV033 Background Paper further, there are a number of key issues identified as facing Reading, including, inter alia:

- *"Poor access to formal children's play facilities in a number of areas of the Borough, <u>particularly in North Reading</u>;*
- *<u>Barriers that reduces residents' access to open space</u>;*
- *Many local open spaces that do not meet <u>users' aspirations with respect to variety, quality and facilities,</u> causing a significant number of people to travel to more attractive recreational open space further afield; and*
- *<u>Reading provides less recreational open space than guidelines recommend although much of the deficit is supplied by private or school's sports pitches</u>."* (Our emphasis)

As clearly set out in this document, the green space to be provided, by making it more accessible, by enabling better connection to and throughout the locality and by providing a multitude of uses within the land for public enjoyment ensures 'use' is substantially improved.

In this manner, members of the public will be able to access green spaces from Gravel Hill, Highdown Hill Road and Kidmore End Road, providing much-needed, off-road connectivity for pedestrians and cyclists. Provision of this space will also help to plug an identified gap in open space provision within RBC, as evidenced by Figure 2 of the Open Spaces Strategy 2018 Update Note (reproduced overleaf), which shows the desired 400m buffer from recreational open space. The proposals at RGC will therefore directly benefit the northern extents of Brooklyn Drive, Crawshay Drive and Kidmore End Road, through provision of open spaces to areas within these residential locations which sit outside of the current buffer.



Approximate location of open and play spaces in RBC and SODC land

Figure 7 – Reproduction of Figure 2 RBC Open Spaces Strategy Update Note, 2018

Currently use benefit is accrued by golfers who pay for the privilege of accessing the course. In respect of the small number of residents who overlook the land, there is no use; they have no access to the land. Therefore, only enjoyment can be gained, for which our considered response is given in the following section.

Enjoyment – how an individual, household or group gains 'enjoyment' from land is highly subjective. It is personal and takes into account many different factors. When determining this in terms of the proposals, the enjoyment perceived to be lost versus that perceived to be gained relates in many ways to the direct or indirect way this is encountered.

A key direct loss is to the golfers, who will no longer be able to enjoy playing golf at the site at Kidmore End Road. A background of having to open the course at later hours due to noise complaints from some adjacent residents, objections to earlier plans for expansion of the course to the west within SODC and lack of local patronage of facilities meant that this was the only available, credible course of

action and therefore promotion of the site through the RBC and SODC Local Plan processes, following two membership votes, meant that the decision was taken to leave. This planning application, plus the other uses set out in the Community Infrastructure Plan show how it is envisaged to manage and maintain the golf club land. There will be no continuation of existing uses from the end of March 2021, this being for commercial reasons that are set out earlier in this document.

An indirect loss relates to the small number of local residents that overlook the course. Whilst certain enjoyment will have been gained by proximity to the golf course, it is a central tenet of planning that there is no "right to a view", as underlined by the judgement in Wood-Robinson v Secretary of State for the Environment (1998). A simple way of explaining this point in the context of the golf club land would be that it would be entirely within the rights of RGC to erect a fence of not more than two metres around its boundary, in much the same way that adjacent landowners do between their properties. Such works would not require planning permission. Irrespective of this fact, many of the properties bordering the golf club have sought to protect their own amenity from the noises of machinery and the views of passing golfers by erecting large fences or hedging to the extent that no view over the course is possible save for from first floor level. Whilst there are some exceptions, in the majority of instances, the 'enjoyment' of the site extends to no more than a view, from first floor level, over extensive gardens, towards the course.

Against this, the proposed development will enable access to the course by residents of the new housing development and by existing local residents, including those currently overlooking the course, and will therefore provide for significantly greater immersive enjoyment by a significantly greater number of people than is currently the case.

Finally, it is recognised that, in line with Policy EN8, development may be permitted where it is clearly demonstrated that:

'replacement open space, of a similar standard and function, can be provided at an accessible location close by, or

that improvements to recreational facilities on remaining open space can be provided to a level sufficient to outweigh the loss of the open space'

Taking the latter point first, the proposals clearly identify that improvements to the remaining open space, including provision of recreational facilities, are

provided to a level sufficient to outweigh the loss of open space. The open space currently offers limited use, limited access and limited enjoyment. Against this, the development proposals comprise roughly one third of the current open space being available for open and full use, access and enjoyment, roughly one third remaining in a similar position to that in-situ, i.e. inaccessible green space; this forming front and back garden space, and roughly one third taken up by residential development, which also accrues other benefit in terms of Council aspirations and meeting acute housing need in the Borough. A basic balancing exercise in this regard shows a positive outcome when giving consideration to perceived loss and accrued benefit in respect of the open space.

Notwithstanding this, RGC's commitment to the local area provides for contributions to existing open and play spaces in the locality, as well as contributions towards sporting provision as requested by Sport England.

The Project Team has long maintained that land in SODC is not required to offset Policy EN8; some of this is to be given back to the community and obviously therefore provides additional benefit that is pertinent to the decision-making process.

Nevertheless, for the purposes of assessment, should the Council consider this pertinent, the proposals for 4.4ha of open spaces within the SODC land, which will include parkland, allotments, tree planting and new walking and cycle links, help the scheme to exceed policy requirements. The relevant policy criterion clearly states that replacement open space, of a similar standard and function, can be provided at an accessible location, *close by*. The above quantum of land within SODC is of a similar standard, but of an improved function, given that it will be more accessible and features more uses for public benefit than that it proposes to replace.

In addition, the SODC land is in a highly accessible location, which will help gel Caversham and Emmer Green by enabling north to south and east to west pedestrian and cycle connections and is 'close by'. The dictionary definition of 'close by' is 'nearby, adjacent or neighbouring' which in line with policy can be taken to extend beyond the confines of the Borough. Use of the golf club by members did not stop at county lines, nor will future use for residents be curtailed in this manner. It is therefore entirely reasonable that for the assessment of this aspect of the application that the benefit provided by inclusion

of the part of the SODC land identified for use as parkland, for tree planting and for allotments is given significant, positive weight in decision-making.

Taking the above into account, it is patently clear that the proposed use of land associated with the planning proposals, represents not a loss but a gain in usable, accessible and enjoyable open space; one that better accords with Council Open Space policy and, indeed, overcomes the shortcomings identified in EV033, enabling the wider locality to have access to 'unrestricted' open space that will doubtless be formally designated as POS should the application be approved. As evidenced, the scheme will also benefit Emmer Green and Caversham residents and the Borough in general, and not just the limited number of groups that currently hold this enjoyment.

The proposals are therefore considered to not only fully accord with Policy EN8, on the basis that they provide the necessary mitigation required alongside wider direct benefit to the locality, but to also accord with Sport England 'Active Design' principles and, perhaps more importantly, with other over-arching policies of the Local Plan; in this regard, supporting text to Policy EN7 states at paragraph 4.2.28 that '*Access to high quality open spaces, sport and recreation can make an important contribution to the health and well-being of communities. Open space policies contribute towards many of the goals of the Council's Health and Wellbeing Strategy (2017-2020) by supporting residents to make healthy lifestyle choices and reducing social isolation through public open space*'. (Our emphasis).

The proposals will also ensure an absolute *designated* public open space gain in the Borough of 3.6ha[7], as well as the 10% net biodiversity gain identifiable within Section 6 of the Ecological Impact Assessment and a significant increase in the number of trees within RGC's landholdings. In respect of this latter point, whilst it will take time for these trees to mature it must be remembered that it is RGC that has been responsible for the majority of planting of what is in-situ in the development area, alongside the sensible and appropriate management of this and other woodland within its landholding. RGC wish to enhance overall tree cover and it is for this reason that the Tree Preservation Order (TPO) applications made by RBC and SODC were not challenged at the time of making and a significant commitment to tree planting has been made.

Finally, the proposals help to meet a number of the key issues facing Emmer Green in terms of open space; providing an accessible amenity for all;

[7] 4.1ha if SUDS basins are included, which will form usable space

substantially improving the play offer in the locality; enabling informal play, walking, cycling and leisure activity in an area measuring at least 3.6ha in total on site, supported by CIL/S106 contributions and substantial off-site voluntary contribution of 4.4 ha of land, infrastructure and facilities; and ensuring that this combination of amenities is available to help offset the desire to travel elsewhere through being directly available for use by local residents, both existing and proposed.

Overall, the proposed improvements to the level of amenity to be enjoyed by the general public significantly outweigh the loss of a private, inaccessible facility that is currently enjoyed by a relatively small number of golf club members and those with a view over the course. Consequently, for the reasons given above it is considered that the proposal robustly complies with the requirements of Policy EN8.

9.11 Policy RL6 of the RBLP Protection of Leisure Facilities and Public Houses states that:

"Existing leisure facilities or public houses will generally be retained, and there is a strong presumption in favour of retaining leisure facilities or public houses where they are the only facility of their type in a district, major local or local centre. Developments that would result in the loss of a leisure facility or a public house will not be permitted unless it can be clearly demonstrated that:

a. There is no need for this type of facility in this area; <u>or</u>

b. The function of the facility can be adequately fulfilled by an existing facility, or a facility proposed as part of the development, where that facility would be at least as accessible to the same catchment; <u>or</u>

c. Unless the site is a sports or recreation facility, the impacts on amenity of residents or on crime and security of retaining the facility could not be dealt with through other measures and would be so severe as to outweigh the benefits to the wider community of retaining the facility". (Our emphasis)

RGC is classified as a leisure facility. Loss of this leisure facility is justified because there is an over-supply of golf courses in the Reading area; the function of RGC will be taken over by CHGC, which is being upgraded for this purpose and with 3.6ha of the RGC golf course within RBC proposed to be converted into public, as opposed to currently private, open space, the community will benefit

from this change to a significant degree alongside the provision of additional and enhanced local leisure and community facilities.

As part of the pre-application process, discussions have also been held with Sport England and England Golf regarding the proposals at both RGC and CHGC, with both organisations concluding that the move from RGC to CHGC can be supported for the reasons set out throughout this document.

In addition, it is clear, given that golfers in many instances drive to playing venues due to the need to transport equipment that CHGC occupies the same 'catchment' as RGC; it is only 800m away from closest point to closest point and indeed will be more accessible to a portion of the existing membership.

In the context of RBC, it is also important to note that:

- A full complement of golfing activity would not have been able to have been provided by the remainder of the site; RGC's requirement was always to provide an 18-hole course with additional facilities, the details of this approach having been set out in Section 4 of this document. By comparison, the proposals at CHGC provide for a full 18-hole course, as well as improved practice and function facilities over and above that on offer at RGC on the basis of that currently in-situ. In this regard, the function of RGC can be adequately fulfilled by an existing facility, satisfying criterion b) of Policy RL6.

- Notwithstanding the above, proposals to improve the course, clubhouse and to provide new driving range and academy course/golf sixes facilities to cater for a range of ages and abilities form a wider part of RGC's aspirations for the redevelopment project, as set out in Section 7 of this document.

- Only six golfing holes are located in RBC, two of which will be significantly curtailed through any implementation of Policy CA1b built form.

- Provision of a replacement clubhouse and car parking would not logically take place in RBC, given the land take involved and the impact this would have upon space available for golfing activity when compared locating this to the current car park adjacent to the 7th hole within the SODC land. In this regard, it has been determined to offer a small family golf centre in some of the SODC land, which will offer footgolf, disc golf and short game

golf, alongside a café and outdoor seating area. The proposed location and layout of this facility is as detailed in the Community Infrastructure Plan ref: P19-2877_01H.

The latest iteration of the proposals has also sought to provide more certainty and commitment to the number of deliverables cited in this document, in so doing helping to identify a scheme that closely follows Sport England's *'Active Design'* principles, as set out in Section 8 of this document.

Consequently, the proposals identify a solid rationale for the changes proposed and on-site and off-site improvements that meet policy requirements on the basis of that currently in-situ, whilst identifying significant further enhancements to the leisure offer available within the catchment, in doing so demonstrating irrefutable compliance with Policy RL6.

9.12 Policy OU1 of the *RBLP New and Existing Community Facilities* states that:

"Proposals for new, extended or improved community facilities will be acceptable, particularly where this will involve co-location of facilities on a single site. Proposals for on-site intensification of important facilities, such as schools and healthcare uses will be supported, subject to other policies in the plan.

New community facilities should be located where there is a choice of means of travel (including walking and cycling), and in existing centres where possible".

The proposal includes the provision of a new Health Centre, which constitutes a significant community benefit. The health centre is proposed to be situated in an accessible location by the Kidmore End Road frontage, which is both close to Emmer Green local centre and within easy access to the public transport network. Consequently, this part of the proposal ensures compliance with this policy.

9.13 Policy H1 of the RBLP *Provision for Housing* states that:

"Provision will be made for <u>at least</u> an additional 15,847 homes (averaging 689 homes per annum) in Reading Borough for the period 2013 to 2036.

The Council will continue to work with neighbouring authorities within the Western Berkshire Housing Market Area to ensure that the shortfall of 230 dwellings that cannot be provided within Reading will be met over the plan period". (Our emphasis)

The LPA's housing need target is a challenging one. The proposal will help to meet this target and the additional homes will go some way towards addressing the shortfall of 230 dwellings over the plan period (to 2036). Consequently, this proposal will help to meet the objectives of this policy.

9.9 Paragraph 4.4.1 of the RBLP states that:

"There is a pressing need for additional housing in Reading and the surrounding area".

This is a clear statement of fact. The proposal will provide 260 new homes that will help to meet this pressing need.

9.10 Paragraph 4.4.2 of the RBLP states that:

"The Berkshire Strategic Housing Market Assessment (SHMA) identifies Reading as being part of a Western Berkshire Housing Market Area, together with West Berkshire, Wokingham and Bracknell Forest. Within this area, an 'objectively assessed need' is identified for a total of 2,855 new homes every year up to 2036. Reading's share of this need is 699 homes per year, or a total of 16,077 between 2013 and 2036. The expectation in the NPPF is that local planning authorities should meet their need unless they can demonstrate that doing so is not possible". (Our emphasis)

Clearly, RBC should be meeting its own need and not expecting neighbouring LPA's to carry the burden. Development of this site will help to ensure that RBC can meet its own need.

9.11 Paragraph 4.4.3 of the RBLP states that:

"However, Reading is a very tightly defined urban area, and sites for new development are limited. The undeveloped land that does exist is mainly either in the functional floodplain or is important public open space. Provision of new housing therefore involves a heavy reliance on previously developed land, and the supply of such sites constrains the amount of housing that can be delivered in the Borough. The Council therefore needs to set targets for housing provision that are capable of being met". (Our emphasis)

Policy EN8 states that development of important open spaces, such as RGC, can be permitted if it can be replaced nearby, as has been demonstrated in this case. It should also be noted that the application site is not public open space or local

green space; it is private land. In this regard, the provision of housing at RGC will help the Council more satisfactorily meet the minimum housing targets it has set.

9.12 Looking at matters in greater detail, it is considered that increased importance should be placed on the deliverability of schemes and, in particular, how they meet identified housing need as defined by the SHMA. In light of the recent coronavirus pandemic, it is likely that residents will identify further need for outdoor spaces, both public and private, which the RBC will find more difficult to successfully achieve given reliance on previously developed sites and a high number of flatted schemes. Recent governmental changes to housing need methodology place also further pressure on the Council to increase housing delivery within the Borough across the Local Plan period. We deal with these matters in greater detail, below.

Reliance on Previously Developed Sites

9.13 The Local Plan identifies several site allocations within the Central (CR), South Reading (SR), West Reading and Tilehurst (WR), East Reading (ER) and Caversham and Emmer Green (CA) areas that together with existing planning permissions and windfall assumptions will help to deliver upon identified housing need in the Borough. The table below which supports Policy H1 identifies these assumptions:

Total need for Reading Borough 2013-36	**16,077 homes**
Minus completed 2013-2019	*4,202 homes*
Minus permitted or resolution to grant (>10 dwellings) at 31st March 2019[74]	*4,696 homes*
Minus allowance for small site (<10 dwellings) windfalls at 127 per year 2019-2036	*2,159 homes*
Remainder not already identified	**5,020 homes**
Identified in Local Plan	**4,790 homes**
Shortfall to be accommodated elsewhere in HMA	**230 homes**

Figure 7 – Housing delivery identified in the Local Plan

9.14 Review of the Local Plan identifies, as set out earlier in this section, that there is a heavy assumption on previously developed land. In tandem with this, there are relatively few sites that can deliver true family housing, with gardens, rather than the flatted development that accounts for the bulk of the housing numbers identified in the Local Plan.

9.15 During the pre-application process, much has been made by objector groups of the ability of 'South Reading' to deliver the family accommodation identified

within the Local Plan period. Whilst some of this development will undoubtedly come forward during the plan period, it is noted that there are significant constraints to development coming forward as envisaged due to the piecemeal nature of the locations proposed and the different lease arrangements that will exist over some of these land parcels.

9.16 In respect of the Policy SR2 allocation, footnote 115 within the Local Plan identifies some of the potential issues facing the site. The technical complexity of bringing forward a residential site within close proximity to a number of existing commercial and industrial processes will require significant buffers to guard against noise and air pollution, which unless brought forward as one uniform scheme will constrain the site from reaching its full potential, unless a wider masterplan with interim arrangements to protect amenity can be satisfactorily identified.

9.17 Whilst the wide housing range identified for Policy SR2 partly acknowledges this, it is contended that achievement of the lower quantum would still require densities in excess of 70dph (gross), given a 13.69ha overall site area and the stated policy desire to provide landscape and commercial buffers, a retail extension to the existing Morrisons Centre and a potential new commercial area along the Manor Farm Road frontage.

9.18 To provide context, the site area for the Policy SR2 allocation is highly comparable in size to that with the application site at RGC, but this particular site is seeking to achieve between close to triple and quadruple the housing delivery.

9.19 Policy SR3 features similar constraints and the difficulties faced in juxtaposing residential and commercial uses are noted in policy text, alongside very significant constraints relating to flooding, archaeology and contaminated land. Accordingly, seeking to provide a lower quantum of 330 dwellings on 5.38ha would again require densities in excess of 70dph (gross).

9.20 Whilst it is doubtless that such densities can be achieved, some consideration has to be given to the type of housing being provided within the Borough, the spaces that will support this and how this can be reconciled with housing need as evidenced in the SHMA; this aspect of planning for Reading has never been more important, as seen during the recent coronavirus lockdown and the profound impact it has had on the way we all work, live and play. Green space will become

ever more important for sitting in private gardens to take solace and for walking through pocket parks to parklands for exercise and fresh air.

9.21 In this context, there is also some doubt as to whether the full complement of town centre and PDR schemes envisaged will come forward during the plan period; supply matches up with demand and it is considered likely that there will be inevitable reduction in the attractiveness of flats to the market in the short term, which will manifest in delayed delivery against planned numbers.

9.22 Further, it is now recognised that some of the closest, largest developments to Reading Golf Club, including the Hermes proposals for land at Vastern Court Retail Park, as well as that on the former SSE site on Vastern Road, are currently proposed to come forward without affordable housing. As such, delivery against local plan objectives, particularly acute housing need, will need to be made up from other sources.

The CA allocations

9.23 Looking at the local level in greater detail, it is noted that within Section 11 *Monitoring* of the Local Plan that a net change of 'approx.' 700 additional dwellings is anticipated within Caversham and Emmer Green to 2036. Considering the maximum housing level associated with the various CA1 and CA2 site allocations, only 443 dwellings are currently identified against this target, meaning that a significant shortfall exists that would need to be found via other means.

9.24 The CA2, *Caversham Park,* allocation identifies that this policy does not allocate the site for additional development over and above conversion of the house and that there may be scope for some limited development on previously developed land within the site, subject to compliance on heritage, landscaping and ecological matters In this respect, and in light of the significant views into and around the site and the presence of a Grade II listed building on site, it is considered that no more than 100 dwellings are likely to be generated in total from this site.

Indicator	Relevant policies	Target		Data		
		Target	Target Date	Source	Date	Where presented
Caversham and Emmer Green						
Dwellings completed in Caversham and Emmer Green (net change)	CA1, CA2	700 (approx.)	By 2036	RBC	Annual	AMR

Figure 8 – Extract from Figure 11.1, RBLP 2019

9.25 The above development quanta, which are taken as maxima, and also include a 78 bed nursing home, identify that more than 200 additional homes would still need to be found over the plan period to meet identified supply in Caversham and Emmer Green unless significant windfall allowance can come forward. In this regard, it is considered unlikely that such windfall could be found without significant intensification of existing urban and suburban sites, which in the case of those in 'Zone 3' for the purposes of housing mix and parking would also need to meet stringent house size and space standards.

9.26 Taking the above into consideration, it is evident that the site at RGC holds a number of significant advantages: firstly, it is deliverable immediately; secondly, it is being progressed as a low density development of 21.15dph (gross), which in turn provides the Council with 3.6ha dedicated public open space for the use by residents in Emmer Green and farther afield (the course was well patronised during the lockdown and RGC received a very significant number of letters of gratitude[8] helping to evidence the importance of providing space); thirdly, the site will allow for the CA1 and CA2 housing numbers identified in the RBLP to be more effectively and appropriately met; fourthly, flatted development on site is surrounded by private amenity space and significant open space, as well as access to dedicated parking and so provides a relatively rare form of sustainably-located and spacious, yet more affordable accommodation within the Borough (it is considered that some of the market portion of the flatted development could be sold as Over 55's retirement property); finally, the provision of new, accessible, public open space in Emmer Green will also act as a welcome local counter-balance to the recent loss of designated green space in North Reading, namely that to the rear of Chiltern Road, which was a well-used resource by families with children and dog walkers.

Housing Delivery

9.27 Irrespective of potential barriers to housing delivery in South Reading and within the town centre, an assessment of overall housing delivery in Reading is appropriate to consideration of matters pertaining to this application. This detail is set out in the yearly Annual Monitoring Reports (AMR) produced by the Council. The various results and indicators within this document identify that RBC has seen significant housing growth through permitted development applications for office to residential conversion (PDR); paragraph 8.32 of the most recent 2018-

[8] This evidence can be provided for the Council's consideration if considered appropriate.

19 AMR highlights that between 16% and 40% of all housing supply over the past three years has been from this source.

9.28 The housing delivery figures that feed into the Local Plan respond to the aggregated totals of that completed, permitted/resolution to grant, plus site allocations and shortfalls and so it can clearly be interpreted that whilst units are being delivered within Reading, a significant proportion of these are falling well short in terms of that required to meet housing need, particularly acute family need, as evidenced in the SHMA. The Council itself has commented on the relative failings, save for some limited exceptions, of PDR in terms of providing an adequate standard of housing product.

9.29 Taking this point further, it is clear that net completions for the plan period from 2013 onwards would not have met the required 689 per annum delivery rate in any single year, save for 2018/19, without PDR units coming forward.

9.30 Accordingly, whilst the Local Plan now evidences a much smaller shortfall and the AMR is identifying that the Council has been meeting planned targets in terms of housing delivery since 2015/16, in order to effectively and properly meet housing need there is a requirement to find sites that can deliver the family-sized market and affordable housing as identified within the SHMA. A review of housing need is covered in following paragraphs.

Housing Need

9.31 Produced on behalf of the Berkshire Local Planning Authorities in 2016, the SHMA sets out an objective assessment of housing needs across the Housing Market Areas (HMAs) included within the study area, including guidance on the form of housing required within the HMA.

9.32 In this manner, at Table 101[9] it is indicated that, within the Western Berkshire HMA, 62.0% of the additional market housing required between 2013 and 2036 will be for 3+ bedroom dwellings. Conversely, 23.9% of the additional affordable housing required between 2013 and 2036 will be for 3+ bedroom dwellings.

9.33 Breaking this down to the local scale, Tables 107 and 108[10] set out that (across the same period) 6,180 additional 3 and 4 bedroom market dwellings and 813 additional 3 and 4 bedroom affordable dwellings will be required within Reading

[9] Ibid (February 2016), p. 289.
[10] Ibid (February 2016), p. 295/296.

Borough. This equates to 60.0% and 23.9% of the total number of market and affordable dwellings needed respectively.

9.34 Against this, RGC seeks to provide 61.9% of all dwellings as 3+bedroom. It is proposed to provide a balanced mix between market and affordable housing, meaning that the scheme will strongly deliver on the affordable housing need evidenced in the SHMA, whilst significantly exceeding that required by planning policy H3.

Changes to Governmental Standard Methodology

9.35 In December 2020, the Government announced changes to way that housing need is calculated on a national basis. This housing need formula will be used to provide a starting point in the process of local planning for new homes, with the updated methodology introduced to help councils to enable the delivery of 300,000 homes a year by the mid-2020s, while prioritising brownfield sites and urban areas.

9.36 Under the proposals, cities will be encouraged to plan for more family homes – which are the right size and type for families to live in – and to make the most of vacant buildings and underused land to protect green spaces. The plans will encourage more homes to be built in England's 20 largest cities and urban centres (of which Reading is identified as one such location), boosting local economies by supporting jobs in the building sector, and revitalising high streets with the footfall new residents bring.

9.37 The associated proposed increase in housing need methodology from the 689 homes per annum cited in Policy H1 of the Local Plan to 876 homes per annum, with increased focus not only on family homes, but family homes of the right size and type for families to live in, will require greater consideration to be given to the means of how best to achieve this. It is considered that *inter alia* the following options are available to increase housing delivery within the Borough:

1. Deliver more from existing allocations within the Local Plan. It is evident that this would mean developing to higher heights/densities in order to achieve this. Whilst this could help to achieve the higher figures required by changes in the standard methodology, there would be other planning implications to consider such as impact on skyline and neighbouring amenity, and the resultant development may also not meet the aspirations in terms of delivery of family housing.

2. Utilise vacant or under-utilised land and buildings, including offices and retail space. Whilst this could help meet requirements, the loss of commercial space in a constrained urban environment would run contrary to Local Plan Policy EM3 which seeks to protect against loss of such land.

3. Find new sites for development. In a constrained urban environment, which features a number of natural and man-made barriers to development, it is considered that there would be few sites falling outside of the above two categories that would be available for development and sequentially preferable to that at RGC.

4. Extend current Duty to Co-operate agreements in place with adjacent Local Planning Authorities to help meet any shortfall in housing delivery, particularly given the recent failure of the proposed Grazeley development to the south of Reading.

9.38 Taking into consideration that set out above, it is evident that housing delivery has not met requirements in terms of unit type, mix or tenure and that current acute housing need will be exacerbated further by changes to the standard methodology. Therefore, good use of sites such as RGC that directly deliver on *need*, rather than simply delivering on *numbers*, should be prioritised and supported.

9.39 To summarise the current position in respect of housing need:

- There is a housing shortfall that exists within the Local Plan – which in real terms has been artificially bolstered by a high number of office to residential permitted development schemes;

- There has been an increase in housing need attributable to the recent change in standard methodology, which will require the Council to identify how to deliver a further 187 homes per annum over and above that identified in Policy H1 of the Local Plan;

- A number of town centre projects have stalled – with many of these equally not providing the affordable housing envisaged on the basis of applications submitted;

- Grazeley has been shelved by West Berkshire Council, which has implications for the Borough in terms of meeting Local Plan shortfall in the

medium to long term – particularly bearing in mind that the start of the defined 'medium term' in the Local Plan runs from 2021 to 2026;

- There are few options for traditional family housing on sites other than Reading Golf Club, these being primarily related to small-scale infill or regeneration schemes on former industrial and commercial land, the former of which will contribute nothing to open space generation and the latter of which will need to meet open and play space requirements whilst also in-building buffers to ensure satisfactory amenity can be achieved as well as dealing with remediation costs to consider whether affordable housing requirements can be achieved;

- There is a historic and ongoing position regarding delivery of policy compliant affordable housing, which has not been achieved on a very significant amount of brownfield sites within the Borough. Indeed, the Council's overall affordable housing delivery rate stands at around 20%, against a policy requirement of 30% and an actual requirement of 60%, as identified in the draft Affordable Housing SPD.

9.40 In this context, it is considered that the proposals at Reading Golf Club represent good, considered, multi-benefit development. Whilst the Council should seek to focus development on brownfield sites, this should not and equally cannot form the sole focus. Greenfield releases, on 'white land' within the Settlement Boundary and on what is soon to be vacant land, is appropriate, particularly in consideration of the highly sustainable development proposed and the consequent benefits the development will bring to the locality, including actual public access to green space, 10% net biodiversity gain and significant and properly targeted delivery to offset acute and growing housing need in the Borough.

9.41 Planning is there to ensure the benefits enjoyed by today's residents can also be enjoyed by tomorrow's residents. The proposals in this manner are sustainable; allowing for greater enjoyment and activity in open and play spaces, net gain in biodiversity, very significant tree planting, provision of healthcare and delivery of housing for those on low incomes, new entrants to the market, families wishing to move up the ladder and also downsizing opportunities for the empty nesters who inadvertently live in highly unsustainable living patterns and currently form a block to the housing ladder, in doing so, creating the very housing need that this project seeks to redress.

The Site Allocation

9.42 Policy CA1b of the RBLP *Part of Reading Golf Course, Kidmore End Road* states that:

"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.

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;*
- *Ensure that vehicular access is provided from suitable roads to the area to be retained for golf;*
- *Take measures to mitigate impacts on the highway network, particularly on Kidmore End Road and Tanners Lane;*
- *Include all parking requirements within the site to avoid exacerbating parking issues on existing streets;*
- *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 ha. 90-130 dwellings, community provision including healthcare and replacement clubhouse".

Clearly, this policy demonstrates that the LPA considers RGC to be a suitable and sustainable location for new development, albeit on a smaller scale than currently proposed. However, the pressing need for housing, highlighted above, and the surplus of golf courses, logically points to the site being able to accommodate more housing than the number proposed by this policy. Furthermore, the proposed development will comply with the bullet point requirements of this policy, to deliver a high quality residential-led development in a sustainable location. Overall, the proposal broadly complies with this policy, whilst delivering additional, much needed, new homes.

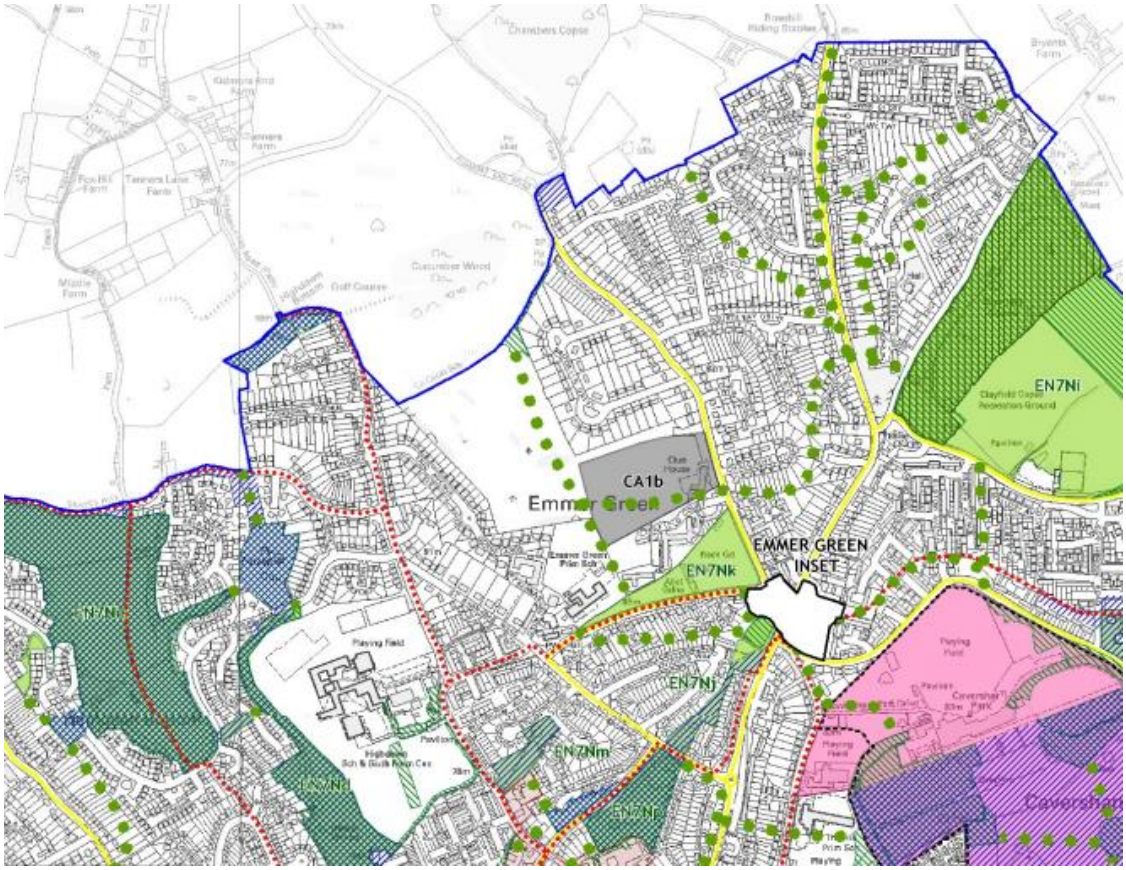


Figure 9 - Extract from Reading Borough Local Plan 2019 Proposals Map.

9.43 Paragraph 8.22 of the RBLP states that:

"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".

There is no need to protect the use of this site for golf. There is a surplus of golf courses and a shortage of housing. For the reasons provided earlier in this document, it neither makes sound planning or commercial sense to retain land for golf use in this context. That said, under current proposals 3.6ha of the application site will be converted to public open space use, which will be of significant benefit to the local community. There will be no need to replace the

clubhouse within the site because upgraded golf clubhouse facilities are being provided at CHGC, which has been acquired for this purpose. The loss of one private membership golf club will not be harmful to the local community, whilst the provision of much needed new housing, significant areas of public open space, enhanced play facilities, greater walking and cycling connectivity and a new health centre will be of considerable benefit. A new family golf centre within the SODC land further extends this local benefit, enabling access to sport by a more diverse range of users.

9.44 Paragraph 11 of the NPPF states that:

"Plans and decisions should apply a presumption in favour of sustainable development. For decision-making this means:

c) approving development proposals that accord with an up-to-date development plan without delay".

In this case, the development plan (RBLP) is up to date, having only been adopted in November 2019.

9.45 Paragraph 12 of the NPPF states that:

"*The presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision making. Where a planning application conflicts with an up-to-date development plan (including any neighbourhood plans that form part of the development plan), permission should not usually be granted. Local planning authorities may take decisions that depart from an up-to-date development plan, but only if material considerations in a particular case indicate that the plan should not be followed".*

In this case, the proposal broadly complies with relevant development plan policies, but there are areas of deviation. Therefore, it is important to recognise that there are "material considerations", which indicate that the proposal should be permitted, which are explained in this planning statement.

9.46 Paragraph 59 of the NPPF states that:

"To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing

requirements are addressed and that land with permission is developed without unnecessary delay".

In this context, it is important to note that the proposal will deliver much needed new housing in a sustainable location, which will help to meet the "pressing need" for new homes in Reading, whilst supporting the Government's objective of "significantly boosting the supply of homes".

9.47 Paragraph 92 of the NPPF states that:

"To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:

- *plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;*

The proposal will meet this criterion by providing much needed new housing, including affordable housing, in a sustainable location, whilst also providing a new health centre and areas of public open space, which will be of significant benefit to the health and well-being of the local population.

- *take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community;*

The provision of new health facilities and public open space will support the local community and improve health and well-being.

- *guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs;*

The loss of RGC, although valued by some, will not be overly harmful to the ability of the local community to meet its day-to-day needs. No-one would agree that a golf course is essential for a community to meet its everyday needs. It will be replaced with much needed housing, a health centre and accessible public open space, all of which will make a far more valuable contribution towards meeting the day-to-day needs of the local community. Furthermore, the golf course will be replaced at CHGC, which will ensure that the relatively small

number of members are still able to continue this activity within the same local catchment. The family golf centre will also open wider access to golf to a greater proportion of the local community; perhaps those that would wish to try out the sport on more of a fun basis.

- *ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community; and*

The additional new housing will help to support and sustain local shops and businesses, so that they are retained for the benefit of the wider community.

- *ensure an integrated approach to considering the location of housing, economic uses and community facilities and services".*

The new housing, health centre and public open space will be located in a sustainable and accessible suburban location. The site has been selected in the RBLP as a location for new housing development. The provision of more homes on a larger site will help to effectively meet the pressing need for more homes in Reading, which will accord with the overall aims of the development plan.

9.48 Paragraph 97 states that:

"Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- *an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or*

As explained above, there is currently a surplus of golf courses in the UK, something that has been supported by relevant statutory consultees further to pre-application consultation. In this context, there is no need for RGC to be retained.

- *the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or*

RGC has purchased CHGC and replacement facilities of a much higher standard are already in place, these being in the process of being upgraded. RGC members will be able to transfer to CHGC with no loss of amenity in a very accessible location with the same local catchment.

- *the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.*

While one third of the Golf Course is to be developed with housing and a health centre, 3.6ha of open and play spaces will be provided within the development area, whilst significant landholdings are proposed to support this within part of the land owned by RGC in SODC. Conversion of such an area of private open space to public use will be of direct and realisable benefit to local residents and the wider community. Consequently, the benefits of building on the Golf Course will far outweigh the disbenefits, which will justify the proposed development, as required by this Government policy.

Overall, whilst the LPA may have held concerns that the proposal contravenes policies aimed at protecting public open spaces and leisure facilities, it needs to be borne in mind that the site is currently a private members club, which only benefits in the region of 500 paying members, is not open to the general public, and the package of on-site, community benefits and planning contributions, combined with the provision of improved facilities at CHGC, make it entirely possible for the Council to adopt a flexible approach to the interpretation of its policies, which would enable the application to be approved at the local level taking into account relevant material considerations.

9.49 Consequently, the proposal is considered to be acceptable in principle. Where it deviates slightly from the precise wording of relevant development plan policies, it can be justified by material considerations, including a considerable package of health and well-being benefits, that will accrue from the proposal for the local population.

Affordable Housing Statement

9.50 Policy H3 of the RBLP *Affordable Housing* states that:

"Residential development will make appropriate contribution towards affordable housing to meet the needs of Reading

- *on sites of 10 or more dwellings, 30% of the total dwellings will be in the form of affordable housing;*

The proposal for 257 dwellings, will comprise of 180 (70%) open market homes and 77 affordable homes (30%). This level of provision will comply with Policy H3. The tenure of the affordable homes will accord with the LPA's requirements

and will be secured by means of a section 106 agreement, to be agreed and signed by the appropriate parties.

In determining residential applications the Council will assess the site size, suitability and type of units to be delivered in relation to the current evidence of identified needs. The Council will seek an appropriate tenure mix of affordable housing to include social rented, affordable rent, intermediate rent and shared ownership affordable units. The affordable units provided should be integrated into the development.

In this case, the developer is proposing 77 affordable homes as part of the development. The tenure mix will be agreed between the developer and the LPA as part of the negotiations concerning the heads of terms of the S106 agreement, taking into account that set out within paragraph 4.4.26 of the Local Plan.

The affordable dwellings will be integrated into the development, to ensure that there is a satisfactory mix of dwelling sizes, types and tenures to meet local housing need.

Priority needs are currently for housing with two or more bedrooms that can house families. The Council will regularly monitor and review the need for, and delivery of, affordable housing". (Our emphasis)

The proposal is for most of the affordable dwellings to be 2-bedroom and larger (88.3%). In particular, the proposals will deliver a significant proportion of the 3+ bedroom affordable housing that is a key objective of the Council (77.9%). More details regarding dwelling mix are contained in the section below.

9.51 Paragraph 62 of the NPPF states that:

"*Where a need for affordable housing is identified, planning policies should specify the type of affordable housing required, and expect it to be met on-site unless:*

a) off-site provision or an appropriate financial contribution in lieu can be robustly justified; and

The need for affordable housing is identified in Reading. The proposal will contribute 77 new homes towards meeting this need. All of the homes will be provided on-site, as required by this policy.

b) the agreed approach contributes to the objective of creating mixed and balanced communities".

The proposed development will include a mix of dwelling sizes, tenures and types, which will help to meet local housing need, whilst creating a mixed and balanced community, as required by this policy.

9.52 Consequently, the proposed development, which will include 77 affordable homes (30%), most of which will be 2-bedroom and larger, will be wholly in compliance with Policy H3 and the NPPF regarding affordable housing provision and will also help make up for under-provision coming forward from other allocated sites as set out earlier in this document.

Housing Density and Mix

9.53 Policy H2 of the RBLP *Density and Mix* states that:

"The appropriate density of residential development will be informed by:

- *the character and mix of uses of the area in which it is located, including the housing mix, and including consideration of any nearby heritage assets or important landscape or townscape areas;*

The application site is enclosed to the north, east and south by existing development areas, which form part of the settlement of Emmer Green in Reading. The area is characterised, in the most part, by relatively low-density, suburban, detached housing with large, verdant gardens. In order to respect and be informed by this context, the proposal is for new housing to be provided at an overall density of about 21.15 dph (257 dwellings on 12.15 ha), which is close to the prevailing density of housing in the local area, especially to the east of the site. However, as 4.1 hectares of the site will be dedicated as POS and for SUDs measures, this equates to a net density of about 31.8 dph (257 dwellings on 8.08 ha), which is close to the prevailing density of existing housing to the south and west of the site. The fact that in the region of one third of the site will be landscaped POS, including many retained, mature trees and other greenery, will ensure that the impact of the development on the local area will be softened to a large degree and there will be a transition from development to the south and west to new POS to the north and east, which will ensure that the proposal is in keeping with the existing suburban character and appearance.

Further considerations in respect of density in the context of the character of the local area are provided below in relation to Policy CC7.

- *its current and future level of accessibility by walking, cycling and public transport;*

The application site lies in a highly sustainable and accessible, suburban location close to the facilities of Emmer Green, with easy access also to public transport links into the town centre. More details are provided in the Transport Statement submitted with this planning application, which demonstrate that the proposal complies with this criterion of the policy.

- *the need to achieve high quality design;*

This is an outline application, which has reserved appearance to a later planning stage and so the amount of design information required is limited. However, the Design and Access Statement prepared by Paul Hewett Architects, which is submitted with this application, sets out the general design principles of the scheme.

- *the need to maximise the efficiency of land use; and*

As stated above, the proposed density of the new housing development will be in keeping with character and appearance of the local area. The mixed-use development proposed, including a health centre and large, landscaped areas of POS, will ensure that the land is used as efficiently as possible, in compliance with this criterion.

- *the need to minimise environmental impacts, including detrimental impacts on the amenities of adjoining occupiers.*

The new buildings will be carefully sited within the development to avoid any detrimental impacts on the amenities of neighbours. This aspect of the proposal will be covered in more detail below.

Indicative densities for different types of area are set out in figure 4.5, but the criteria above may indicate that a different density is appropriate. 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. Net densities of below 30 dwellings per hectare will not be acceptable. (Our emphasis)

9.54 Figure 4.5 is set out below:

Figure 4.5: Indicative density ranges (dwellings per hectare)

Town Centre	Urban	Suburban
Above 100	60-120	30-60

As stated above, the gross density of the development will be 21.15 dph and the net density will be 31.8 dph. This is a suburban location, as defined by Figure 4.5 of the Local Plan, which is characterised by low to mid-density, existing housing. This means that housing of a similar density is appropriate on this site. In order to make effective use of the land, yet provide for a scheme that can complement its surroundings, the applicant is proposing a net density that is close to the lower end of that indicated as acceptable within Policy H2 text and supporting Figure 4.5. and is therefore considered to be compliant with policy requirements.

Wherever possible, residential development should contribute towards meeting the needs for the mix of housing set out in figure 4.6, in particular for family homes of three or more bedrooms. As a minimum, on new developments for 10 or more dwellings outside the central area and defined district and local centres, planning decisions will ensure that over 50% of dwellings will be of 3 bedrooms or more, having regard to all other material considerations".

9.55 Figure 4.6 is set out below:

Figure 4.6: Estimated size of accommodation type required in Reading (Source: SHMA 2016)

	1 bedroom	2 bedroom	3 bedroom	4+ bedroom
Market	10.3%	29.6%	41.5%	18.5%
Affordable	43.4%	32.9%	21.6%	2.1%
Overall	18.6%	30.5%	36.5%	14.4%

In this context, the mix of homes proposed to be built on the site will be as follows:

Dwelling Type	**Number**	**Percentage**
1 Bed units	32	12.4%

2 Bed units	66	25.7%
3 Bed units	78	30.4%
4 Bed units	81	31.5%
Total	**257**	**100%**
Tenure	**Number**	
Market	180	70.0%
Affordable	77	30.0%
Total	**260**	**100%**

9.56 From the above table, it can be noted that the proposal includes a smaller number of 1 and 2-bedroom dwellings and the proportion of 3-bedroom and larger dwellings will exceed the suggested percentages within Figure 4.6. This is because the site lies in a low to medium density, suburban location where larger, family-sized dwellings are most appropriate. It should be noted that many more than 50% of the new dwellings will be 3-bedroom and larger (61.9%) and that houses constitute more than three-quarters of all development; the total skewed by provision of flats above the health centre, which is considered to be an appropriate use of land and buildings in terms of location, ensuring 24-hour activity and surveillance on the site frontage and enabling minimum net densities as advocated by Policy H2 to be met.

9.57 Paragraph 4.4.10 of the RBLP states that:

"In terms of a policy requirement, it is not possible to introduce a blanket requirement across the whole Borough. A very substantial amount of Reading's housing need will need to be met in the town centre due to the availability of sites, and delivery of a substantial amount of family housing on these sites will not be achievable. <u>This places a particular onus on those sites outside centres to help to meet the needs for family homes</u>. As such, a minimum requirement for family homes should be applied to major schemes as a baseline, but, <u>on sites where a greater contribution is possible, the presumption will be that the</u>

percentage of family homes should increase, unless other material considerations, such as viability, indicate otherwise. (Our emphasis)

The proposal includes only a small number of 1 and 2-bedroom flats. This is because it is considered that the appropriate place for small flats is the town centre, where large number of smaller flats are being provided. In suburban locations such as this, it is most appropriate to provide larger, family housing, which is what is being proposed.

9.58 Paragraph 122 of the NPPF states that:

"Planning policies and decisions should support development that makes efficient use of land, taking into account:

- *the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;*

There is a recognised need for housing in Reading and especially larger homes for families. The proposal will provide larger homes that will help to meet this need.

- *local market conditions and viability;*

The local area is characterised by family-sized homes and there is clearly a demand for such homes. The proposal will help to meet this demand.

- *the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;*

As described above, the site is located close to a range of services and amenities in Emmer Green and there is good access by public transport to the town centre and other locations. Furthermore, the proposal includes the provision of a new health centre and public open space, which will help to improve local amenities and reduce car use. More details are set out in the Transport Statement.

- *the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and*

The proposal will result in the redevelopment of a private members club and its replacement with much needed new housing and other amenities. The proposal

will be carefully designed to ensure that the prevailing, verdant character of this edge of town location, will be enhanced, and not harmed, by the proposal.

- *the importance of securing well-designed, attractive and healthy places".*

The proposal package, which includes a new health centre and significant new areas of public open space, will considerably enhance the health and well being of both existing and future local residents.

9.59 Consequently, it is considered that the proposal is for an appropriate density and dwelling mix, including a significant number of family-sized homes, which will comply with the relevant development plan policy and the NPPF.

Character of the Area

9.60 Policy CC7 of the RBLP *Design and the Public Realm* states that:

"*All development must be of high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located. The various components of development form, including: -*

- *Layout: urban structure and urban grain;*

The illustrative layout submitted with the application (which is in outline with only access not reserved), shows that the layout will largely be led by the need for a spine road from Kidmore End Road in the east to the western end of the site adjoining the proposed main area of POS to the east of the site. Either side of the central spine road, smaller roads will radiate of the north and south, some of which will be cul-de-sacs and some will link back to the central spine road to ensure a traditional street pattern and as much permeability as possible. Footpaths and cycleways will also link between the roads and the areas of POS to add to the permeability of the site. The development will mostly consist of semi-detached and detached housing, reflecting the character of adjoining properties to the south, east and north. Further details are contained in the Design and Access Statement, which is submitted with this application.

- *Landscape;*

The proposal will include considerable areas of POS; about one third of the site area, which will be landscaped to a high standard. Each of the houses will have its own discreet front and rear gardens, and the flats will have shared open space,

so that the whole scheme will retain a very verdant character and appearance. Existing quality trees and hedgerows will be retained and incorporated into the landscaping scheme, so that the development will have a mature character from the very start. Surface water attenuation basins will be required within the development, which will increase the proportion of greenspace within the scheme. Car parking areas will be broken up with landscaping in order to avoid areas of excessive hardstanding within the site. Further details are contained in the Landscape Strategy, which is submitted with this application.

- *Density and mix;*

The development represents a gross density of 21.15dph or a net density of 31.8dph if removing 3.51ha of Public Open Space, 0.49ha of SUDs and 0.07ha of street planting from calculations[11]. In terms of Council policy, the net density sits just above the bottom of the density range given within Policy H2.

Whilst it is understood that the approach to density will be informed by the criteria set out within Policy H2 including *inter alia* the character and mix of uses of the area in which it is located, accessibility and environmental impacts, it is also clearly identified within policy that there is a need to *'maximise the efficiency of land use'* and that *'Net densities of below 30 dwellings per hectare will not be acceptable'* (Our emphasis). This supporting text is provided after the criteria within Policy H2, i.e. taking into account of the above, net densities of 30+dph *must* still be achieved. This is not unsurprising given the thrust of NPPF policy to optimise the use of land and buildings. Given acute housing need within the Borough, and the implications of changing (and increasing) housing need through changes to the Government's Standard Housing Methodology (the detail of which is provided later in this document), it is also entirely appropriate to adopt such an approach.

Looking further at the housing proposals, densities are skewed by provision of flats over the health centre. For the purposes of assessment of the main body of houses, if looking at these properties in isolation of the 34 flats above the Health Centre, the area for which measures 0.75ha, net densities are only 30.4dph, which suggests that every effort has been made to provide a low-density and sympathetic development which satisfactorily accords with the prevailing character of the area.

[11] This figure reduces to 29.75dph if SUDS and street planting is excluded from the calculation

When assessing matters further, it is important in the assessment process to consider the existing street pattern and how this is represented in terms of density. The local area is characterised by large houses with large back gardens, but these streets feature a distinct lack of directly or closely accessible local space. Gross densities within the area range from 7dph for Brooklyn Drive (6.87ha and 48 dwellings) to 18dph for Gorselands and Eric Avenue (3.6ha and 65 dwellings).

If simply replicating the prevailing pattern of development in the area, housing on the golf course land at a gross density of 21.15dph would closely accord with that in-situ in respect of land on the western boundary, which has been calculated at 18.06dph.

Notwithstanding this, it is important to apply appropriate criteria to the determination exercise, as this will enable an honest assessment of the site in the context of the local character of the area and ensure that an appropriate baseline is applied. In this regard, if Brooklyn Drive, Gorselands, Kidmore End Road etc were to be developed to today's standards, given that the current quantum of open space provided within this area has been proven to be insufficient according to the Council's own Open Space Assessment, it is contended that more open space would have to be placed across this area, which in turn would lead to smaller overall garden spaces for these properties. The resultant smaller net developable area would push up net densities, which in the case of Eric Avenue and Gorselands would extend to densities either closely according to or exceeding that proposed on the adjacent golf club land; this assumes 0.89ha land take for open space (using the same percentage measure as that applied to the golf club), which would be approximate to that required on the development site, meaning that gross densities would increase to 23.98dph – 2.71ha and 65 dwellings. Land at Brooklyn Drive would similarly increase to 7.73dph on the same measure (assuming 0.66ha land take).

The above position does not take into account NPPF policy in terms of optimising use of land and buildings, Local Plan policy on density or the acute housing need identified in the Borough, all of which are strong material considerations in terms of setting an appropriate density for housing on the golf club land.

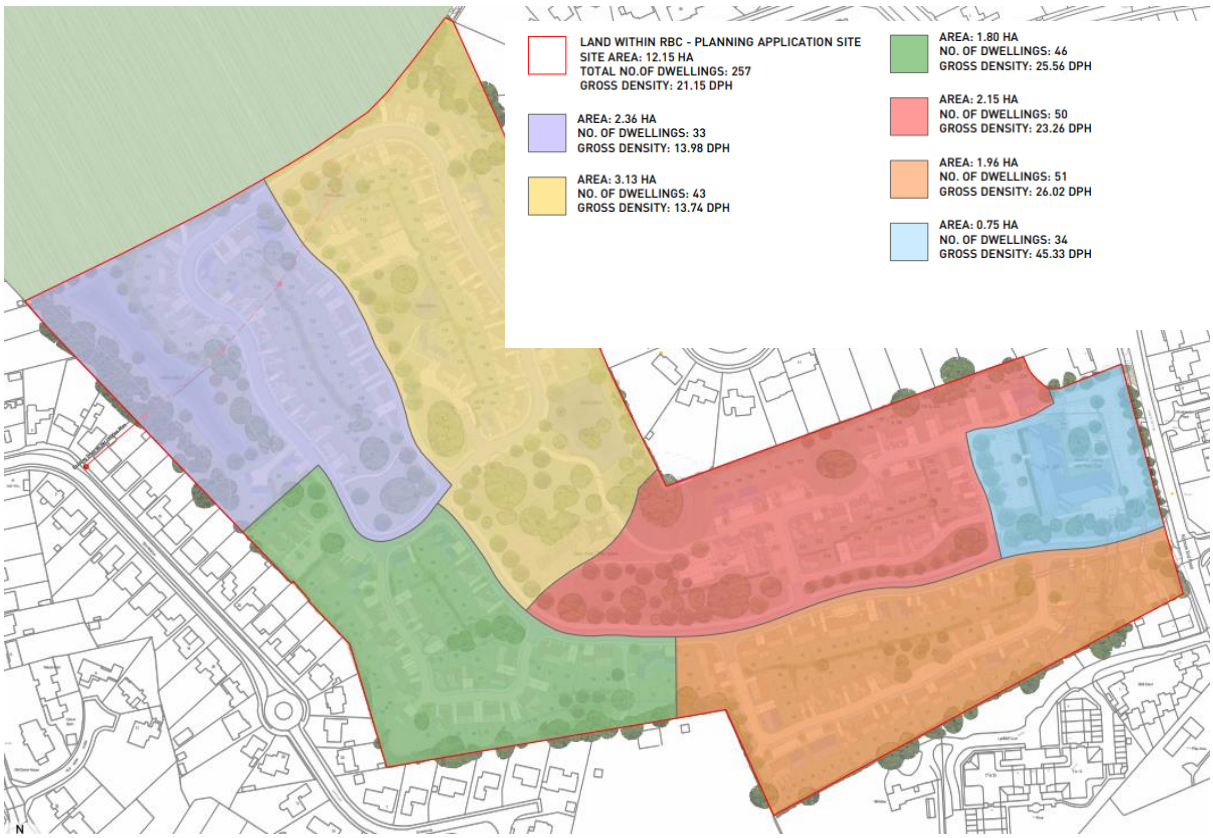


Figure 10 – Gross densities per area within the proposed development site

Providing further evidence to set out our considerations in terms of density, Figure 10 above identifies how this has been distributed throughout the site. The distribution highlights a number of key aspects to the determination of the application:

1. The density within 'Policy CA1b' will be no more than 27dph on the basis of the aggregation of that provided in the blue, red and orange shaded areas. Whilst these land parcels do not fully follow the policy allocation boundary, the additional 23 units and land shown in these areas that do not form part of Policy CA1b are provided at a lower density (23 units within 1.09ha additional to the 3.75ha identified in that policy, i.e. 21.10dph).
2. Density is lowest adjacent to the western boundary of Brooklyn Drive at 13.74dph.
3. Density reduces from south to north, being lowest at the transition point to the land in the SODC administrative area.
4. There are no land parcels containing only houses that exceed 26.02dph.

Table of Open Space Provision On Site			
	Quantum Guideline (hectares per 1000 population)	Quantum Required Based On 260 Units (2.4 people per unit)	Quantum Provided On Site
Playing Pitches	1.2	0.75Ha	0ha
All Outdoor Sports	1.6	1.00ha	0ha
Equipped / Designated Play Area	0.25	0.16ha	0.16ha (plus informal play throughout within parks and gardens)
Other Outdoor Provision (MUGAs and Skateboard Parks)	0.3	0.19ha	0ha
Total Formal Outdoor Space Quantum		0.16ha (Play only) 1.94ha (Sports)	0.16ha (Play only)
Parks and Gardens	0.5	0.31ha	1.05ha
Amenity Green Space	0.6	0.37ha	1.14ha
Natural and Semi-Natural	1.8	1.12ha	1.16ha
Total Informal Outdoor Space Quantum		1.8ha	3.41ha
Total Open Space Quantum		**1.96ha (excluding sports)**	**3.51ha**
SuDS (In addition to the above)			0.49ha

Figure 11 – Distribution of Green Space within the proposed development site

As identified within the Green Space Plan above, on the golf club land in RBC roughly one third of the land area will be given over to public open space, with roughly one third of the entire site to be included as garden space. Only one third is sought to be built upon. The effect of policy, however, is an anomalous position in that the urban grain pattern of old can no longer be replicated if fully meeting prevailing policy requirements.

Review of density, and in this case, gross density, therefore provides a helpful yardstick in terms of what is or is not acceptable in accordance with today's policies and standards and so provision of a scheme that accords not only with surrounding density, but is at the very bottom of that considered acceptable by the Council in planning terms is by right acceptable on assessment of this criterion.

Looking at mix, it is considered that the provision of a family housing-focused development is entirely compatible with the surrounding area. The proposals will bring forth a scheme that comprises 199 houses (77.4%), with the flats being primarily limited to above the health centre, where they are most appropriate. In this manner, a considered and appropriate mix of housing and affordable housing

to meet the clearly defined range of housing needs set out in the Local Plan and draft Affordable Housing SPD will be delivered by this project.

Finding means to offset loss of family housing created by empty nesters in the locality, whilst simultaneously providing products that allow for downsizing has a dual benefit, freeing up a congested housing market and enabling more housing choice, affordability and flexibility to both existing and next generations of Emmer Green residents. The scheme in this manner strongly accords with policy requirements.

- *Scale: height and massing; and*

As stated above, this is an outline application and these aspects of the scheme are not yet fixed. However, the illustrative scheme shows just one block of apartments, plus that proposed above the health centre, with the remainder of the scheme being mainly semi-detached and detached housing. This reflects the character of the local area, which mostly consists of larger houses in their own plots. The flats are likely to be 2.5-storey, while the significant majority of the houses will be 2-storey, which, again, reflects the existing character and appearance of the area. More details in this regard are contained in the Design and Access Statement, which is submitted with this application.

- *Architectural detail and materials*

This is an outline application, so detailed matters relating to appearance will be submitted at the reserved matters stage, as explained in the Design and Access Statement. Needless to say, the developers will ensure that the new buildings will be designed to a high standard and constructed out of quality materials that blend in with the local vernacular.

will be assessed to ensure that the development proposed makes a positive contribution to the following urban design objectives: -

- *Character - a place with its own identity and sense of place*

The existing undulating landscape will be retained and incorporated into the layout and design, which will give the development a unique character and appearance. The sites natural features, including mature trees and hedgerows, will be retained, as much as practicable, to provide for a better relationship between the new development and its surroundings.

- *Continuity and enclosure*

The development will include significant areas of public open space. The new dwellings will each have their own individual private areas of amenity space. These will be enclosed by walls, hedges and fences. Buildings will follow a continuous line around each street block, with open front gardens and enclosed rear gardens.

- *Quality of the public realm and provision of green infrastructure and landscaping*

The arrangement of paving, lighting, planting, orientation, shelter, signage and street furniture of high quality, will ensure that the public realm is easy and enjoyable for everyone to use. Existing green infrastructure will be retained and incorporated into the development. A comprehensive landscaping scheme of the highest quality will ensure that the development blends successfully into the existing urban edge environment.

- *Ease of movement and permeability*

The proposed new roads, footpaths and cycleways will connect into existing routes and ensure that existing movement patterns can be improved and enhanced. The scheme has been designed with a spine road running from east to west and smaller roads and driveways running off it. These smaller roads will link up with existing footpaths and cycleways and they will then link into the new areas of POS to the north-west. Overall, the scheme will be extremely permeable.

- *Legibility - clear image and easy to understand*

Landmarks, gateways and focal points will help people to find their way into and around the development. Vistas and views into and out of the development will create visual links between the existing and newly developed areas. New planting will help to emphasise pedestrian routes into, out of and around the development. Visible routes will help to make the area feel safe and unthreatening. Public open spaces will be overlooked to ensure a high level of natural surveillance

- *Adaptability – capable of adaptation over time*

Most of the new buildings will be created for residential use. However, there will be scope to use them for other, related uses over time. For example, there is a trend towards more home working and all new dwellings will be suitable for this

use. Equally, the health centre will be built in a manner allowing it to be put to other uses, such as community or leisure uses, if needed at some time in the future.

- *Diversity – meets a wide range of needs.*

The proposal contains a mix of uses, which will make best use of the available land. The majority of the site, in the region of 60%, will be taken up by a mix of residential uses, including flats and houses, market and affordable homes, while about one third will be taken up by Public Open Space, which will make good use of existing green infrastructure and new landscaping. A small area will be occupied by the new Health Centre, which will be located at the Kidmore End Road site frontage, close to existing bus routes.

Developments will also be assessed to ensure that they: -

- *Respond positively to their local context and create or reinforce local character and distinctiveness, including protecting and enhancing the historic environment of the Borough and providing value to the public realm;*

The existing character of the local area is urban fringe and suburban. There are no high-quality heritage assets in the immediate area. The site is surrounded by fairly modern low-density housing. Mostly made up of detached, two-storey houses in large, verdant gardens. There are some more modern dwellings situated to the south-east of the site, but, in the main, the site is adjoined by traditional buildings and spaces. In this context, the proposal will seek to create a much more attractive built form, which will incorporate and improve upon existing green infrastructure. The scheme will include a great deal of new POS, which will greatly improve local amenity, as the site is currently private open space, only used by paying RGC members. The public realm will be significantly enhanced as a result of the provision of this new POS.

- *Create safe and accessible environments where crime and disorder or fear of crime does not undermine quality of life or community cohesion;*

All of the proposed areas of POS, roads, footpaths and cycleways, will be overlooked by new dwellings, which will face outwards into the communal areas, rather than turning their back on it. This will ensure that the development is a secure and safe place to live, work and travel within.

- *Address the needs of all in society and are accessible, usable and easy to understand by them, including providing suitable access to, into and within, its facilities, for all potential users, including disabled people, so that they can use them safely and easily;*

All of the new buildings, roads, footpaths, cycleways and areas of POS will be provided to a high standard and the developer will ensure that they are all accessible for all sectors of society, including the elderly and disabled.

- *Are visually attractive as a result of good high-quality built forms and spaces, the inclusion of public art and appropriate materials and landscaping.*

The development will be constructed to a high standard using good quality materials and landscaping. This will ensure that the proposal is highly attractive and a welcome addition to the built-form, landscape and streetscape of the local area.

Applications for major developments, or other relevant developments, should be accompanied by a design and access statement that deals with all the above matters.

This planning application is accompanied by the DAS, provided by Paul Hewett Architects, which sets out the design ethos of the proposal in far more detail.

9.61 Paragraph 122 of the NPPF (referred to in full above) states that development should make efficient use of land, taking into account a number of matters, including the desirability of maintaining an area's prevailing character and setting. In this case, the development will respect and improve the prevailing character of the local area and it will improve its setting, through the provision of high quality built form in the context of existing and new green infrastructure, which will enhance the character and appearance of the local area.

9.62 Paragraph 127 of the NPPF states that:

Planning policies and decisions should ensure that developments:

- *will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*

The proposed development will bring quality to the local area. Although the Golf Club is open space, it is private and for the use of paying members only. The proposals will create a new development, which will meet high standards of urban design and it will include substantial areas of POS, which will be linked by roads, footpaths and cycleways, in a highly permeable manner. These features will ensure that the new townscape and built form will endure for many decades into the future and make a positive contribution to the character and appearance of the local area.

- *are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*

The application has set out significant detail through provision of site layout plans, landscape plans, utilities plans and tree constraints plans to provide a series of parameters within which high-quality development can come forward. The resultant proposals are low to medium density in line with the Local Plan policy with the approach to architecture and landscaping robustly set out in the DAS, Landscape DAS and planning drawings.

- *are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*

The local area is characterised, primarily by relatively low-density suburban housing in an urban fringe location. The proposal will have a slightly higher net density (31.8 dph), whilst the development will incorporate a significant amount of POS and high-quality landscaping, to ensure that this slight increase in density does not detract at all from the verdant, existing character of the locality. For the reasons set out earlier in paragraph 9.60, the approach to density is sympathetic to the local character and history of the area, whilst being realistic in terms of adoption of today's planning standards.

- *establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*

This proposed arrangement of streets, spaces, buildings and public realm, will be of a high standard that will improve and enhance the existing character and appearance of the area.

- *optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*

The proposed development of 257 dwellings (180 market and 77 affordable), as well as a health centre and significant areas of Public Open Space, will make an optimal use of the site. Currently, the site is very underused. It is a Golf Club that is only used by paying members. The development will open the site up to considerably more use by new and existing residents, which will be to be benefit of their health and well-being. Furthermore, the new residents will make use of existing shops, restaurants, buses and other services, which will provide health and well-being benefit and help to maintain a sustainable community.

- *create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.*

The local area is already safe, inclusive and accessible. The development will improve and enhance this, especially through the replacement of inaccessible private undesignated open space with accessible, designated Public Open Space, which will greatly improve amenity locally, increase connectivity between Emmer Green and Caversham and help to improve people's quality of life and mental well-being. The proposal will add positively to the community and help to improve social cohesion and resilience.

9.63 Consequently, it is considered that the proposal will considerably improve and enhance the character and appearance of the local area, thus ensuring that the proposal complies with relevant development plan policy and the NPPF.

<u>Residential Amenity</u>

9.64 Policy CC8 of the RBLP *Safeguarding Amenity* states that:

"Development will not cause a detrimental impact on the living environment of existing residential properties or unacceptable living conditions for new residential properties, in terms of:

- *Privacy and overlooking;*

Although this is an outline application, the proposal has been carefully designed in order to ensure that the new dwellings will be sited in accordance with policy standards to ensure that no unacceptable loss of privacy will accrue as a result of these proposals. Most of the new dwellings will only be 2-storey in height and existing landscaping along the boundaries of the site will be retained and re-enforced in order to further mitigate the likely impact on neighbours. In addition, the new dwellings will be sited carefully in relation to each other in order to ensure that none of the new dwellings will suffer harmful levels of overlooking.

- *Access to sunlight and daylight;*

As stated above, the proposed dwellings will be low-rise and of an indicative maximum of 2.5-storeys in height. Where they are to be sited to the south of existing properties, where overshadowing and loss of daylight and sunlight could occur, they will also be sited well away from the boundaries of the site. The risk of loss of sunlight and daylight to neighbouring properties will be minimal. In addition, the proposed dwellings will be sited carefully in relation to each other in order to ensure that none of the new dwellings will suffer harmful levels of overshadowing.

- *Visual dominance and overbearing effects of a development;*

As stated above, the new buildings closest to the property boundaries will be set away from existing properties by mainly using a back to back arrangement so that no overbearing impact will accrue. Existing boundary landscaping will be retained and re-enforced to act as a buffer between properties and new buildings will be low-rise and no more than 2.5-storeys in height. New dwellings will be carefully sited in relation to each other, in order to ensure that none of the new dwellings suffers from any harmful overbearing impact as a result of the proposals.

- *Harm to outlook;*

The existing outlook for residents will be preserved as much as possible, in that existing green infrastructure will be retained as much as possible. Over one third of the site area will be public open space and none of the new buildings will be more than 2.5-storeys in height and provided at low density. It should be recognised that the LPA has allocated the eastern half of the development site for new housing and therefore the additional 'in principle' elements relate in the main to the proposed land that has not been allocated within RBC. Furthermore,

although neighbouring residents are used to having a green and pleasant view across the Golf Course, they have no legal entitlement to this view, which is across land that they do not own and planning rights exist that could entirely block this view at ground floor level if implemented. It is therefore strongly contended that the perceived impact on the small number of local residents with a limited view over the golf course is not sufficient, in planning terms, to outweigh the significant benefits offered by the project. The limited, realistic amenity that can be assessed in planning terms is that from first floor level, which in many instances is across deep back garden spaces. Balancing this perceived loss of amenity against the delivery on acute market and affordable housing need, opening up of the site to benefit a significantly greater proportion of local residents and providing improvements in, amongst other things, connectivity, healthcare and biodiversity, it is evident that the residential proposals not only robustly comply with policy they also deliver strongly on numerous IDP aspirations.

- *Noise and disturbance;*

The noisiest and most disturbing time for neighbouring residents is likely to be during the construction phase of the development. However, the LPA will be able to place enforceable conditions on the planning consent to ensure that a Construction Management Plan is put in place prior to development and the hours of working are not excessive. Environmental health legislation is in place to prevent excessive noise and fumes being created by building works, which the Council also has the power to enforce against.

- *Artificial lighting;*

The development will need street lighting on the spine road. However, it will be possible for the Council to control the level of lighting to ensure that it is not excessive or harmful. The LPA will be able to place a condition on the planning consent to ensure that lighting levels are not excessive and do not harmfully disturb the amenities of neighbouring properties or areas of ecological interest.

- *Vibration;*
- *Dust and fumes;*
- *Smell;*

As with noise, during the construction phase, these elements can be controlled by the LPA by means of a condition on the planning consent.

- *Crime and safety.*

The applicant would welcome the feedback of the Thames Valley Police Crime Prevention officer on the proposal, bearing in mind the fact that this is an outline planning application and all plans, apart from the access, are reserved matters at this stage.

The position of habitable rooms, windows and outdoor living spaces will be particularly important. A back-to-back distance of 20 metres between dwellings is usually appropriate, although the circumstances on individual sites may enable dwellings to be closer without a detrimental effect on privacy.

The new dwellings will be carefully sited to ensure that they relate well to each other and neighbouring properties. All back to back distances will be a minimum of 20 metres to ensure that adequate levels of privacy are provided within the new development.

As well as immediate impacts, other aspects to which this policy applies will include matters such as hours of operation of businesses, and effects of traffic movements, particularly of heavy goods vehicles (HGVs). Proposals which would generate regular movements of HGVs on residential roads will not be acceptable".

These matters can all be controlled by the LPA by suitable conditions on the planning consent.

9.65 Paragraph 127 f) of the NPPF states that developments should create spaces that have *a high standard of amenity for existing and future users.* The proposal will comply with this requirement of national policy.

9.66 Consequently, it is considered that the proposal will not result in any material harm to residential amenity and it will comply with the requirements of the relevant development plan policy and the NPPF.

<u>Internal and External Amenity Standards</u>

9.67 Policy H5 of the RBLP *Standards for Housing* states that:

"New build housing should be built to the following standards, unless it can be clearly demonstrated that this would render a development unviable:

a. *All new build housing outside the Central Area as defined on the Proposals Map will comply with the nationally described space standard".*

In this case, all of the new dwellings will be constructed to comply with the national space standard.

9.68 The Technical Housing Standards – nationally described space standard, published by the Government in March 2015, sets out minimum areas for different sizes and types of dwellings, which are set out in the table below:

Table 1 - Minimum gross internal floor areas and storage (m^2)

Number of bedrooms(b)	Number of bed spaces (persons)	1 storey dwellings	2 storey dwellings	3 storey dwellings	Built-in storage
1b	1p	39 (37) *			1.0
	2p	50	58		1.5
2b	3p	61	70		2.0
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	
4b	5p	90	97	103	3.0
	6p	99	106	112	
	7p	108	115	121	
	8p	117	124	130	
5b	6p	103	110	116	3.5
	7p	112	119	125	
	8p	121	128	134	
6b	7p	116	123	129	4.0
	8p	125	132	138	

The proposal will be built in accordance with these standards. Full details will be provided at the reserved matters stage.

9.69 Policy H10 of the RBLP *Private and Communal Outdoor Space* states that:

"Dwellings will be provided with functional private or communal open space, including green space wherever possible, that allows for suitable sitting-out areas, children's play areas, home food production, green waste composting, refuse storage, general outdoor storage and drying space. Houses will be provided with private outdoor space whereas flats may be provided with communal outdoor space, balconies and/or roof gardens.

The proposed houses will have private rear gardens of sufficient size and dimensions, which will provide future residents with a high standard of amenity.

The proposed flats will have shared gardens and balconies, where no overlooking will accrue, so that future residents will enjoy a high standard of amenity.

The design of outdoor areas will respect the size and character of other similar spaces in the vicinity, clearly identify whether they are private or communal spaces, ensure that they are appropriately related to main entrances, enhance safety and the perception of safety for future residents and the general public, and not be compromised by the relationship of other buildings which may be detrimental in terms of overlooking, overbearing or overshadowing".

The indicative site layout shows that all outdoor areas, both private and public open spaces, will be designed to a high standard to ensure that they can be enjoyed by future residents without causing any risk to safety for residents and the general public. More details in this regard will be submitted at the reserved matters stage.

9.70 Paragraph 4.4.87 of the RBLP states that:

"In the past, the Council has sought the following minimum provisions for private or communal outdoor space for each type of accommodation, and they provide a useful guide for proposals:

Houses: Useable private outdoor space should be no less than the gross floor area of the dwelling to which it relates (measured externally and including garage space).

As indicated on the illustrative site layout plan, it is intended that the proposed houses will have gardens that are equivalent in area to the overall floor area of the house to which they are attached.

(b) Flats outside central Reading:

- *1 and 2-bedroom: 25 sq m per flat*

As indicated on the illustrative site layout plan, it is intended that the proposed flats will have at least 25 sqm of amenity space each, either in the form of balconies, shared gardens or both.

9.71 Consequently, it is clear that, with regard to internal and external amenity space, the proposal complies with relevant development plan policies and Government standards.

Public Open Space

9.72 Policy EN9 of the RBLP *Provision of Open Space* states that:

"*All new development should make provision for appropriate open space based on the needs of the development. This can be achieved through on or off-site provision, contributions toward provision or improvement of existing leisure or recreational facilities.*

In this case, the proposal includes a considerable amount of POS. Within the development site alone, c. 4.1 ha, equating to 33.5% of the site area, will be provided as POS. In addition, a considerable tract of land to the north of the site, measuring 4.4ha, which forms part of the remainder of the golf course, will be turned into a parkland, woodland and allotments, which will all be provided for the benefit of the local community.

On sites of 50 dwellings or more, or for developments where the availability and quality of existing open space has been identified as deficient, new provision will be sought. Development must ensure satisfactory provision of children's play areas and neighbourhood parks.

A LAP will be provided centrally within the areas of POS within the application site. In addition, an existing children's play area at Emmer Green Recreation Ground will be upgraded, by means of a financial contribution from the developer, which will be controlled by the LPA by means of a s106 agreement. Provision of designated, accessible and well-connected POS alongside improvements to existing provision will help to improve identified shortages in play provision in North Reading and POS more generally as set out in the EV033 Local Green Space and Public Open Space Background Paper.

A secure maintenance arrangement shall be demonstrated to ensure that any open space is properly maintained throughout the life of the development. In exceptional circumstances where the Council agrees to the adoption of the open space, a commuted sum for future maintenance will be required as part of any legal agreement.

As with the payment of a financial contribution mentioned above, any contributions required for the future maintenance of POS will be controlled by legal agreement. As stated earlier in this document, it is intended to offer 4.4 ha of the SODC land, containing the parkland, woodland and allotments, to be

maintained by a private management company with a service charge placed upon the development to enable ongoing cover, likely to be paid to Reading Borough Council annually, but then released to the manager of the land as a means of ensuring the financing and enforcement of the ongoing upkeep of this land. Discussions with the Council can enable fine tuning of such detail, including the exact extent of land parcels involved, to ensure that management and maintenance of land is appropriately catered for in perpetuity.

The provision of open space for all developments shall satisfy the most urgent need subject to considerations of particular deficiencies. The most up-to-date Open Spaces Strategy should guide provision type and size. New open space should:

- *Be in useable parcels of land and not be fragmented;*

The site layout submitted with this planning application shows that the proposed areas of POS within the site will be connected throughout the site and along the spine road. Further detail regarding intent is set out within the Landscape Strategy supporting this submission.

- *Be safely and easily accessible and not severed by any physical barrier, including a road;*

There will significant areas of POS within the development, which will be sited on both sides of the spine road. Individual areas of POS on either side of the road will be connected with each other to provide a sinuous, connected area of POS to the benefit of future and existing residents.

- *Be accessible to the general public and be designed so as to feel that it is part of the public and not private realm;*

All of the areas will be accessible to the general public, not just the residents of the new homes. Footpaths and cycleways will link existing residential areas, from Emmer Green to Caversham, with the new areas of POS, so that they are inviting, usable and provide benefit that extends well beyond site confines.

- *Create a safe environment, appropriately considering lighting and layout to reduce the fear of crime;*

All of the proposed areas of POS will be overlooked by homes, which will discourage anti-social behaviour. In addition, lighting will be provided where it is considered appropriate to avoid any overly dark areas.

- *Provide some informal landscaping for aesthetic, wildlife and recreational purposes; and*

A comprehensive landscaping scheme will be submitted at the reserved matters stage, which will include informal planting areas. A robust indication of intent is also provided within the Landscape Strategy submitted with this application, whilst landscape plans included within the Landscape DAS help to set context in terms of locations and quantum of open, play and landscaped spaces.

- *Link into the Green Network where possible".*

As stated above, footpaths and cycleways will provide access into and through the areas of POS. These will link up with existing and new footpaths and cycleways to provide access into the new area of POS to the north and other parts of the network. The proposals also help to introduce a strong north-south and east-west green link through the site in line with that proposed by Policy EN12.

9.73 Paragraph 92 of the NPPF states that:

"*To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:*

- *plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments".* (Our emphasis)

In this case, the developer is providing a significant community benefit in the form of a health centre, potential additional community spaces within this building (depending on the amount of space identified by the local NHS CCG) and large areas of POS, both within and to the north of the development area, which will be of benefit to the local community for decades to come.

9.74 Paragraph 96 of the NPPF states that:

"Access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate".

In this case, the proposal includes a considerable amount of POS, both within the development area and on the northern part of the site, outside of the red line area. Currently, the site is a private members club, which is not open to the general public. The opening up of the site to the general public will significantly enhance and improve recreational facilities for the local community. There is no need to retain the site as a golf course, as there is a surplus of such facilities as evidenced in this document and supported by Sport England and England Golf further to pre-application consultation, but there is a need for housing and public open space, as identified within the Local Plan and background documents (an assessment of which has been made within this document) which the proposals will help to meet.

9.75 Consequently, as the proposed POS will more than meet the minimum requirements of the proposed development and will also help improve upon existing under-supply within the Borough, it is considered that the scheme will comply with relevant development plan policies and the NPPF in this regard.

Access and Movement

9.76 Policy CC6 of the Local Plan *Accessibility and the Intensity of Development* states that:

"The scale and density of development will be related to its level of accessibility by walking, cycling and public transport to a range of services and facilities, with the densest and largest scale development taking place in the most accessible locations. Unless it can be demonstrated that the accessibility of a site is to be significantly upgraded, for example, by providing high quality pedestrian routes or providing access to good public transport services, any new development must be at a scale, density and intensity appropriate to that level of accessibility".

In this regard, the location is highly accessible; it is located within walking distance of Emmer Green shops and services, close to Bus Stops on Kidmore End Road and Grove Road and within close walking distance of schools and the existing and proposed Health Centre's. More detail is provided within the Transport Assessment supporting this application.

In addition, the scheme proposes very significant increases in walking and cycling connectivity which in line with paragraph 4.1.25 of the Local Plan recognises that:

"It is important that development is accessible by a choice of modes of transport. This means that the primary locations for new development will be those accessible by walking and cycling to a wide range of employment, services and facilities, leisure, education and health facilities, or which are accessible by walking to routes/stops of frequent public transport services that provide easy access to the aforementioned uses…"

Further, paragraph 4.1.25 of the Local Plan goes on to state that:

"Locating development in areas accessible by walking and cycling can serve important public health goals, including

- *increased physical activity;*
- *decreased incidences of cardiovascular disease and obesity;*
- *reduced levels of stress caused by traffic noise and congestion;*
- *fewer cases of lung or heart disease associated with poor air quality;*
- *proximity to healthcare services;*
- *access to open space for recreation".*

The proposals in this manner, and in line with the Active Design principles and commitments set out in Section 8 of this document, significantly improve connectivity to existing and proposed infrastructure and services, not only for proposed residents, but also for those already residing in the area. The provision of new walking and cycling routes will provide greater accessibility from the north-west of the development to Emmer Green centre and potentially from north-east of the development to Emmer Green Primary School.

Figure 6.1. *Wider Sustainable Connections* and supporting text in the Transport Assessment also highlights the good connectivity of the site to the range of proposed services within Emmer Green. As with large sections of Emmer Green, the existing bus stops are accessible to residents of the development and provide good access to bus services from all homes, even if some are more than 400m from the stop. Within the development high quality, overlooked, lit and surfaced walking routes to the bus stops on Kidmore End Road will be provided. Through successful travel planning, new residents living at the development will also be aware of the bus services and how to access them.

In respect of the intensity of development, it is recognised that the golf club has for a long time held membership in the region of 500 members. As is the case with golf, a high number of these members will travel to the club by car, given the need to carry equipment. As such, whilst the baseline conditions have not been assessed on this basis, it is necessary to note that the site attracts quite heavy car usage, particularly in the summer months and on competition days.

Further, part of the site is allocated for the development of up to 130 units, plus community infrastructure, which in accordance with representations made during the Local Plan process, has been identified as a preferable location for a Health Centre. As such, the uplift in traffic relevant to the proposals against both the baseline and allocation is relatively low and therefore able to be accommodated by the local highway network alongside minor works to some junctions, as set out in the Transport Assessment. Indeed, Section 7 of the Transport Assessment clearly identifies the capacity of the local highway network to accommodate traffic associated with the proposed development.

Taking into account the nature of the proposals, walking and cycling links proposed and the package of highways mitigation measures set out in the Transport Assessment, it is contended that: the site is highly accessible; will improve accessibility and connectivity for many existing residents; will encourage greater use of non-car modes and public transport and works towards fulfilment of the NHS Healthy Urban Development Checklist cited in paragraph 4.1.25 of the Local Plan. In this regard, the requirements of Policy CC6 will be fulfilled.

9.77 Policy TR1 of the RBLP *Achieving the Transport Strategy* states that:

"*Proposed development should contribute appropriately to meeting the objectives of the most up-to-date Local Transport Plan or any successor document, including sub-strategies, specific projects identified and the local action plans.*

Planning permission will not be granted for major development proposals unless there is a commitment to implement measures to promote and improve sustainable transport facilities, such as through provision to encourage walking, cycling and the use of public transport; and through agreed travel plans, safe routes to local facilities and services, including schools and parks, and similar measures".

The proposals include the provision of a network of footpaths and cycleways, which will encourage walking and cycling in the local area. The proposed areas of POS, including the parkland, woodland and allotments to the north of the development site, will be linked by footpaths and cycleways, which will encourage people to walk and cycle to them. Public transport will be accessible, as there are existing bus stops close to the site, which will make it very usable for future residents; indeed the proposals represent provision of a missing link between Emmer Green and Caversham, allowing walking and cycling from Crawshay Drive and Kidmore End Road through to Hemdean Road without the need to use the existing street network. This is a substantial benefit which accords with the central ethos of the emerging Reading Transport Strategy 2036, in particular, the proposals for a walking and cycling link from Kidmore End Road to Gravel Hill and then onto Bugs Bottom will allow for a largely flat, off-street link, which connects into the Reading Strategic Cycle Route network to be provided, in turn enabling significantly greater connectivity within North Reading to be achieved. Figure 12 overleaf demonstrates this; a larger scale version of this plan, which is an edited extract from Appendix C of the draft Local Walking and Cycling Infrastructure Plan, which forms part of the Reading Transport Strategy 2036, is also submitted as part of the planning drawing package.

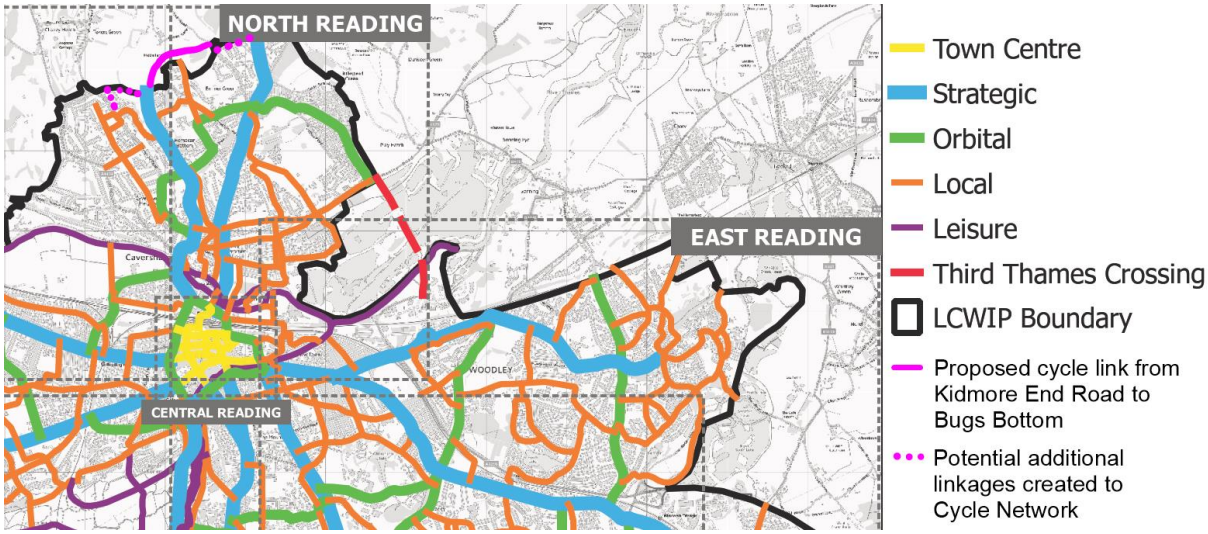


Figure 12 – Extract (edited) from Appendix C, RBC Local Walking and Cycling Infrastructure Plan.

More detail on the proposed location of walking and cycling links within the development site and SODC land is also available within planning drawing no. P19-2877_01 Rev E, Community Infrastructure Plan.

All development proposals should make appropriate provision for works and contributions to ensure an adequate level of accessibility and safety by all modes of transport from all parts of a development, particularly by public transport, walking and cycling, in accordance with any agreed transport assessment submitted as part of the application".

A Transport Assessment and Travel Plan are submitted with this planning application, which set out in detail how the development will comply with these requirements.

9.78 Policy TR3 of the RBLP *Access, Traffic and Highway-Related Matters* states that:

"*In determining proposals involving a new or altered access onto the transport network, improvement works to the transport network, the creation of new transport infrastructure or the generation of additional trips on the transport network, consideration will be given to the effect on safety, congestion and the environment.*

As set out in the Transport Assessment submitted with this application, the masterplan will be designed to accommodate necessary movements by car and service and emergency vehicles but prioritise active modes where possible.

Vehicular access is proposed as a priority junction onto Kidmore End Road. The junction has been designed to achieve appropriate Manual for Streets visibility requirements and accommodate refuse and delivery vehicles turning movements.

Through capacity assessments, it has been demonstrated that the junction is predicted to operate within capacity and cause minimal delays to traffic.

A second access location for health centre users, pedestrian, cycle and emergency access is located north of the main vehicular access onto Kidmore End Road. This emergency access has been designed to accommodate a fire tender in case of emergency.

Proposals involving either the construction of a new site access, or a material increase in the use of an existing site access, directly onto the Classified Highway Network will not be acceptable if they would be likely to result in the encouragement of the use of the network for short local trips or compromise the safe movement and free flow of traffic on the network or the safe use of the road.

The TA has determined that improvements are necessary to accommodate potential traffic impacts generated by the development.

In this regard, a mini roundabout junction arrangement is proposed at the Kidmore End Road / Peppard Road T-Junction to provide traffic calming and better cater for increased traffic flow along Kidmore End Road. The proposed junction has been assessed and the results demonstrate that the junction will operate within capacity.

It is proposed that the developer will provide a contribution (amount to be determined through S106 negotiations) to RBC to enable them to introduce a smarter signal operating scheme such as MOVA at the Peppard Road / Henley Road / Prospect Street / Westfield Road signalised junction. The existing junction has been assessed to determine the impact of the proposed development on the local highway network. The results show that the junction currently operates above the maximum theoretical operating capacity of 90% degree of saturation for a signalised junction in both peak hours. Based on the day of the traffic survey, there are relatively large queues on Peppard Road and Prospect Street in both peak hours and Westfield Road in the PM peak hour.

9.79 Consequently, it is considered that the application includes proposals, which will provide safe access and egress onto the local highway network, which will comply with this policy.

9.80 Policy TR4 of the RBLP *Cycle Routes and Facilities* states that:

"*Developments will be expected to make full use of opportunities to improve access for cyclists to, from and within the development and to integrate cycling through the provision of new facilities. Development of new facilities for cycling, such as cycle hire points and cycle parking, will be acceptable".*

As set out in the Transport Assessment, a well-connected and walkable, safe neighbourhood will be created with high quality links between the site and existing facilities in the local area, such as Emmer Green local centre to the south of the site and leisure routes to the north of the site, so that active travel is an attractive choice for residents living at the new development. Routes will be lit, appropriately surfaced and overlooked and therefore will facilitate walking and cycling through the site. Space has also been set aside to accommodate a cycle hire point by the Health Centre should the Council wish to implement this at a later stage, which can be secured by condition and via legal obligations.

The cycle routes identified in the most up-to-date Cycling Strategy will be maintained, enhanced and added to or extended. Development will not detrimentally affect an identified cycle route. Where opportunities exist, improvements to that route, including the provision of connecting routes, and/or cycling facilities will be sought within developments or through planning contributions".

Existing pedestrian and cycle routes will be retained by the development. The following improvements are also proposed to significantly enhance pedestrian and cycle accessibility to/from the site:

- Provision of raised informal crossing points with herringbone imprint on Lyefield Court at its junction with Kidmore End Road, Kidmore End Road just north of Grove Road and on Grove Road at its junction with Kidmore End Road. These traffic calming features should slow traffic and increase the visibility of pedestrians to drivers.

- Provision of a new mini roundabout at the junction of Kidmore End Road and Peppard Road with imprinted crossing across the Kidmore End Road approach.

The mini roundabout will create a traffic calming feature, slowing traffic on all approaches and next to the signalised pedestrian crossing over Peppard Road, which provides a connection to Emmer Green local centre for pedestrians. The imprinted crossing will raise driver's awareness to pedestrians in the area, which will improve road safety.

- Provision of paths from the development to Highdown Hill Road and Kidmore End Road to connect into the PROW and NCN networks and facilitate easier non-motorised travel from the north, west and east into the site, as set out in Figure 10, above. These will be provided on a voluntary basis by the applicant and for which planning permission is not required.

- Provision of a path through the parkland and to connect Kidmore End Road to Gravel Hill/Bugs Bottom. Provided on a voluntary basis by the applicant and for which planning permission is not required.

9.81 Consequently, it is considered that pedestrian and cycle routes and facilities will be enhanced and improved by the development, which will comply with this development plan policy and also work towards facilitation of the Reading Transport Strategy 2036.

9.82 Policy TR5 of the RBLP *Car and Cycle Parking and Electric Vehicle Charging* states that:

"*Development should provide car parking and cycle parking that is appropriate to the accessibility of locations within the Borough to sustainable transport facilities, particularly public transport*

The proposal will provide sufficient car and cycle parking as part of the development, in compliance with RBC's parking standards (set out below). The site lies in Zone 3, defined as an area with a variety of land uses, within a 400m walk of high frequency bus services (as set out above).

The proposal comprises a mix of 1 to 2-bedroom flats/maisonettes and 2 to 4-bedroom houses. The flats will be provided with communal parking areas, while the houses will have garages and/or driveway parking. An appropriate number of disabled and visitor parking bays will be provided. The health centre will also feature sufficient dedicated parking in compliance with RBC's standards. Policy-compliant cycle parking will also be provided for the dwellings and health centre.

Development should make the following provision for electric vehicle charging points:

- *All new houses with dedicated off-street parking should provide charging points;*
- *Within communal car parks for residential or non-residential developments of at least 10 spaces, 10% of spaces should provide an active charging point.*

The development will provide an active charging point for electric vehicles in 8 of the spaces provided within the communal parking areas. More details will be provided at the Reserved Matters stage.

9.83 Consequently, it is considered that the proposal will provide sufficient car and cycle parking to comply with this policy.

9.84 Paragraph 103 of the NPPF *Promoting Sustainable Transport* states that:

"*The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making".*

As set out in the Transport Assessment, this proposal will provide sustainable connections to the open space to the north and Emmer Green local centre to the south. A raised informal crossing will be provided on Kidmore End Road, Lyefield Court at its junction with Kidmore End Road and on Grove Road at its junction with Kidmore End Road. These traffic calming measures will improve highway safety and encourage walking and cycling locally.

With regard to public transport, the illustrative masterplan shows potential for a bus loop to be provided within the road layout. Existing bus services could be extended to include the bus loop within the site. This option would be subject to discussion with bus operators and other stakeholders.

However, even if a bus loop is not utilised, the site is well served by bus stops at present, with availability in Kidmore End Road. High quality, overlooked, lit and

well surfaced routes will be created. The Travel Plan, submitted with the application, will make residents aware of bus services and how to access them.

9.85 Paragraph 111 of the NPPF *Considering Development Proposals* states that:

"All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed".

The application is accompanied by a Transport Assessment and a Travel Plan, which demonstrate that the proposal meets all of RBC's and national requirements regarding access, travel and parking. Consequently, it is considered that the proposal complies with the relevant access and movement requirements of the NPPF.

9.86 Parking requirements as set out in RBC's Parking Standards SPD. The following tables regarding cycle parking are relevant to this application:

Table 4.2: Minimum Cycle Parking Standards

Land Use	Unit Type	RBC Parking Zone 1-4 Minimum Provision
C3 Residential	1-bed Apartment	0.5 per unit*
	2-bed Apartment	0.5 per unit*
	3+ bed Apartment	1 per unit*
	1-bed House	1 per unit
	2-bed House	2 per unit
	3+-bed House	2 per unit
D1 Clinic / Health Centre	Health Centre	1 space per 2 staff + 1 stand per consulting room

*If no individual secure facility e.g. store or garage associated with property, dedicated parking required. This can be in the form of communal cycle parking.

Table 4.3: Minimum Cycle Parking Provision

Unit Type	Number of Units	Number of Spaces
1-bed Apartment	26	13
2-bed Apartment	20	10
1 Bedroom Maisonette	6	6
2 Bedroom Maisonette	6	12
2-bed House	40	80
3+-bed House	159	318
Total	257	439

The total number of cycle spaces includes those provided within garages at residential properties. When a secure facility, such as a store or garage associated within a property cannot be provided, such as within an apartment, dedicated secure cycle parking will be provided.

Cycle parking will be provided for the health centre in line with the above standards.

9.87 The following tables regarding car parking provision are relevant to this application:

Table 2-1: Maximum Vehicle Parking Standards (Zone 3)

Land Use	Unit Type	RBC Parking Zone 3
C3 Residential	1-bed apartment	1.5 per unit
	2-bed apartment	1.5 per unit
	3+ bed apartment	2 per unit
	1-bed house	1 per unit
	2-bed house	1.5 per unit
	3+-bed house	2 per unit
	Visitor Parking	1 space per 4 dwellings (apartments only)
D1 Clinic / Health Centre	Health Centre	3 per consulting room + 1 per FTE Staff

Table 4.5: Maximum Car Parking Provision

Unit Type	Number of Units	Number of Spaces
1-bed apartment	26	39
2-bed apartment	20	30
1 Bedroom Maisonette	6	6
2 Bedroom Maisonette	6	9
2-bed house	40	60
3+-bed house	318	318
Visitor Parking		12
Total Residential	**257**	**474**
Health Centre		25
Total		**499**

As per RBC's parking standards, proposed units with garages have been included in the parking provision for residential properties. A maximum of 69 spaces will be provided within communal parking areas to cater for residents of apartments who do not have access to a garage or driveway.

Visitor parking has been calculated based on the number of apartments provided within the development only at a ratio of 1 space per 4 dwellings.

Disabled parking will also be provided in line with RBC's parking standards (5% of the total parking capacity). Disabled parking provision typically excludes residential developments, and therefore the number of spaces has been calculated based upon the number of spaces required for apartments. Based upon the above information, 5 disabled spaces will be provided for the residential units and 2 disabled spaces will be provided to serve the Health Centre.

For the purpose of this outline planning application, the health centre has been assumed to have 5 treatment rooms and 10 FTE Staff, as such based on the RBC standards it is assumed that the facility will require 25 spaces (15 for the treatment rooms and 10 for staff).

9.88 Consequently, it has been demonstrated that the proposal complies with the requirements of RBC's cycle and car parking standards, as well as all relevant development plan policies and the NPPF. Further access and movement information, in support of this outline planning application, is contained in the accompanying Transport Assessment and Travel Plan.

Flooding and Drainage

9.89 Policy CC3 of the RBLP *Adaptation to Climate Change* states that:

"*All developments will demonstrate how they have been designed to incorporate measures to adapt to climate change. The following measures shall be incorporated into development:*

All development shall minimise the impact of surface water runoff from the development in the design of the drainage system, and where possible incorporate mitigation and resilience measures for any increases in river flooding levels as a result of climate change".

The development will include measures in the form of SuDS, which will ensure that surface water run-off can be accommodated within the development area, both in the present and the future, taking into account the potential for climate change, so that no material harm will be caused to adjoining land users. The risk of fluvial flooding from rivers is not likely to be an issue in this location. Clearly, the proposal will therefore comply with the requirements of this policy.

9.90 Policy EN18 of the RBLP Flooding and Sustainable Drainage Systems states that:

"*Development will be directed to areas at lowest risk of flooding in the first instance, following the Sequential and Exceptions Test set out in the NPPF, and taking into account the effects of climate change. It will consider flooding from all sources, including fluvial, surface water, groundwater and sewer flooding. Where development in areas at risk of flooding is necessary, it will not reduce the capacity of the flood plain to store floodwater, impede the flow of floodwater or in any way increase the risks to life and property arising from flooding. Wherever possible, development should be designed to reduce flood risk, both on- and off-site*

The application site lies within the Environment Agencies designation of Flood Zone 1, where the risk of fluvial flooding is very low. However, as the site is over 1 hectare in area, a Flood Risk Assessment (FRA) has been submitted with the application. This explains how the development will deal with all flooding risks.

All major developments must incorporate sustainable drainage systems (SuDS) as appropriate and in line with the Government's Technical Standards. Smaller schemes are encouraged to incorporate SuDS, where possible. Runoff rates should aim to reflect greenfield conditions and, in any case, must be no greater

than the existing conditions of the site. Schemes should ensure that the movement of water through vertical infiltration as well as horizontal run-off does not worsen contamination effects. Wherever possible, SuDS provision should maximise ecological benefits, link into the existing Green Network, incorporate tree planting and landscaping and avoid damage to existing significant trees, including through changes to the site hydrology. All new developments in areas of flood risk should give priority to SuDS".

The FRA submitted with this application includes provision for SuDS within the application scheme. The incorporation of SuDS into the development will ensure that surface water run-off from the proposed areas of hardstanding into the local water network will not exceed current greenfield run-off rates. This will ensure that the development will not result in any increased risk of flooding to adjoining land uses.

9.91 Consequently, it is considered that the proposal complies with this policy in terms of mitigating all forms of flood risk. Surface water drainage will be provided in the form of SuDS. Further details are contained in the FRA and Outline Drainage Strategy submitted with this application.

Landscape and Visual Impact Assessment

9.92 Policy EN13 of the RBLP Major Landscape Features and Areas of Outstanding Natural Beauty states that:

"*Development which affects the setting of an Area of Outstanding Natural Beauty (AONB) will be accompanied by a Landscape and Visual Impact Assessment that demonstrates that there is no detrimental impact on the North Wessex Downs or Chilterns AONBs in terms of scale, design, layout or location. None of Reading Borough falls within an AONB, but where the urban area meets the Chilterns AONB is shown on the Proposals Map".*

RGC's landholdings are not located within the AONB, which is situated just over 500m away to the north. The land in RBC itself is located significantly well away from the AONB, at over 1km, with the development site situated within the settlement boundary, flanked by residential development along the entirety of the western and eastern boundaries and well-screened by existing mature and ancient woodland to the north.

In order to assess the impact of the development on the AONB, a Landscape and Visual Impact Assessment has been submitted with this application. This assesses the likely impact of the development on the setting of the AONB, as required by this policy. The LVIA concludes that the development will not have a harmful effect on the AONB.

9.93 Consequently, it is considered that the proposal will not harm the setting of the AONB to the north of the site and the scheme will comply with the requirements of this policy.

9.94 Paragraph 172 of the NPPF *Conserving and Enhancing the Natural Environment* states that:

"*Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues".*

In this case, the application site lies outside of the AONB and is well-screened by natural and man-made features. A LVIA accompanies this outline planning application, which assesses the likely impact of the development on the setting of the AONB. The report concludes that the development will not have a harmful impact on the setting of the AONB.

9.95 As a result, it is considered that the proposal will not have a materially harmful on the AONB and, in this regard, it complies with the requirements of the NPPF, as well as the relevant development plan policies.

<u>Trees and Green Infrastructure</u>

9.96 Policy EN14 of the RBLP *Trees, Hedges and Woodland* states that:

"*Individual trees, groups of trees, hedges and woodlands will be protected from damage or removal where they are of importance, and Reading's vegetation cover will be extended".*

The application site currently contains a significant number of trees and hedges. As far as possible, as indicated on the illustrative masterplan, the development will seek to retain and maintain existing green infrastructure. This will ensure that the development is as verdant and mature as possible from the start. Fencing will be installed before the construction phase in order to protect trees from machinery and ensure their longevity. Inevitably, some trees and hedges will be

removed to enable the development to proceed, but every effort will be made to ensure that the best trees and hedges are retained. Any trees and hedges that are lost will be replaced, on a greater than one for one basis within RBC, as part of a comprehensive landscaping plan, which will be agreed with the LPA at the Reserved Matters stage. In addition, a commitment has been made to a *minimum* 1,000 net gain in trees with land identified in SODC that will help to reinforce the distinction between urban and rural (and RBC and SODC) whilst providing further longer-term screening from the AONB.

New development shall make provision for tree retention and planting within the application site, particularly on the street frontage, or off-site in appropriate situations, to improve the level of tree coverage within the Borough, to maintain and enhance the character and appearance of the area in which a site is located, to provide for biodiversity and to contribute to measures to reduce carbon and adapt to climate change. Measures must be in place to ensure that these trees are adequately maintained.

Important street trees fronting onto Kidmore End Road will be retained, wherever possible, as an integral part of the proposed development. The Kidmore End Road frontage is the gateway to the site. Therefore, it will be important to ensure that these trees are in the majority retained in order to provide a green and verdant entry point into the development. Furthermore, as indicated on the Framework Masterplan submitted with this outline planning application, there will be considerable scope, both within the developed areas and around the fringes of the built-up area, to provide high quality planting of trees and hedges to maintain and enhance the verdant character of the site in this suburban location.

As stated above, the proposal includes significant areas of public open space. These are situated throughout the development and they offer tremendous scope for new and enhanced planting of trees and hedges. Areas of POS have been concentrated where there are the most existing trees and hedges to minimise the need for removal of green infrastructure. Native species will be used as much as possible to attract local fauna and enhance the biodiversity of the area. The full details of the proposed planting will be contained in the comprehensive landscaping scheme that will be submitted to the council at the Reserved Matters stage. The LPA will be able to ensure that planting is maintained in the long-term through the imposition of reasonable conditions on the planning consent notice.

9.97 In this context, it is considered that the impact of the development on trees and green infrastructure will be mitigated by the incorporation of existing trees and hedges into large areas of POS located throughout the site and a proposal to provide significant new landscape planting across the development as part of a comprehensive landscaping scheme.

9.98 The very significant off-site planting proposed holds a benefit to the Borough, due to the proximity of the planting area to the Borough boundary, but further off-site planting in the Borough can be catered for if considered appropriate.

9.99 Clearly, in consideration of the above, the proposal will comply with the relevant development plan policy in this regard.

Environmental Health and Ground Contamination

9.100 Policy EN16 of the RBLP *Pollution and Water Resources* states that:

"*Development will only be permitted on land affected by contamination where it is demonstrated that the contamination and land gas can be satisfactorily managed or remediated so that it is suitable for the proposed end use and will not impact on the groundwater environment, human health, buildings and the wider environment, during demolition and construction phases as well as during the future use of the site".*

This outline planning application is accompanied by a Phase 1 Ground Contamination Assessment. This report concludes that potential ground contamination may be present in the soils underlying the groundkeeper's sheds and associated fuel storage and waste oil tanks and sundry containers, as well as the former chalk quarry.

The risks to human health, plants, water resources, and buildings and services is assumed to be moderate in these areas in the absence of a more detailed site investigation.

Desk Study data has identified the presence of historical landfills located to the north of the site. The possibility of landfill gases migrating towards the site can therefore not be discounted and it is recommended that this should be investigated to ascertain whether any gas protection measures should be incorporated into any proposed structures constructed on the site.

It is therefore recommended that confirmatory samples are collected from the soils underlying the site in the areas of the groundkeeper's sheds, waste oil container, and former chalk quarry. In addition, a series of gas monitoring wells should be installed in the northern part of the site, where gases may migrate from the historical landfill sites, and a gas monitoring programme implemented. This would take the form of a Phase 2 Intrusive Investigation of the site.

9.101 The contamination mitigation measures recommended in the accompanying Phase 1 Ground Contamination Assessment can be secured by the LPA by means of a condition on the planning consent notice. This would ensure that any ground contamination that is found can be dealt with appropriately prior to construction of any dwellings starting on site.

9.102 Paragraph 178 of the NPPF states that:

"*Planning policies and decisions should ensure that:*

a) a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination. This includes risks arising from natural hazards or former activities such as mining, and any proposals for mitigation including land remediation (as well as potential impacts on the natural environment arising from that remediation);

b) after remediation, as a minimum, land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990; and

c) adequate site investigation information, prepared by a competent person, is available to inform these assessments".

In this context, the developer has commissioned a Phase 1 Ground Contamination Assessment, which has identified potential areas for mitigation within the site. The report recommends measures to be taken which can be secured by the LPA by condition to provide adequate protection over the health of existing and future residents.

9.103 Consequently, it is considered that the proposal complies with the relevant development plan policy and the NPPF regarding ground contamination and environmental health.

Noise and Vibration

9.104 Policy CC8 of the RBLP *Safeguarding Amenity* states that:

"*Development will not cause a detrimental impact on the living environment of existing residential properties or unacceptable living conditions for new residential properties, in terms of:*

Noise and disturbance;

Vibration"

In this context, a Noise and Vibration Report has been submitted with this outline planning application. This found that there is the potential for significant effects at existing and future residents due to the proposal as a result of:

- noise and vibration from construction on surrounding residents;
- increases in off-site road traffic noise from construction traffic impacting on residents adjacent to traffic routes;
- road traffic noise changes once operational on residents adjacent to local roads; and
- operational noise associated with the development, including noise from the proposed Health Centre (e.g. delivery noise) and from mechanical plant on surrounding residents.

The report recommends several standard mitigation measures, to reduce any potential for harm to the amenities of existing and future residents from noise and vibration, which can be secured by the LPA by means of suitable conditions on the planning consent.

9.105 Policy EN16 of the RBLP *Pollution and Water Resources* states that:

"*Development will only be permitted where it would not be damaging to the environment and sensitive receptors through land, noise or light pollution".*

As stated above, the Noise and Vibration Report submitted with the application sets out what the potential risks are regarding noise, for existing and future residents, and it recommends measures to mitigate against any harm. The suggested measures will ensure that existing and future residents do not suffer

from unacceptable levels of noise and vibration from the development. The LPA will be able to monitor noise levels, taking action where necessary to prevent any material harm to residential amenity.

9.106 Paragraph 170 of the NPPF states that:

"*Planning policies and decisions should contribute to and enhance the natural and local environment by:*

e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability".

9.107 Paragraph 180 of the NPPF states that:

"*Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:*

a) mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life."

9.108 It is acknowledged that it is important to ensure that new development does not harm residential amenity through unacceptable levels of noise, vibration and other forms of pollution. In this context, it is considered that the risk of harm from noise and vibration will be mitigated by the measures recommended in the Noise and Vibration Report. The LPA will be able to control noise and vibration levels by means of suitable conditions on the planning consent.

9.109 Consequently, it is considered that with regard to harm caused by potential noise and vibration, the proposal complies with the relevant development plan policies and the NPPF.

Air Quality

9.110 Policy EN15 of the RBLP *Air Quality* states that:

"*Development should have regard to the need to improve air quality and reduce the effects of poor air quality.*

i. *Development that would detrimentally affect air quality will not be permitted unless the effect is to be mitigated. The following criteria should be taken into account:*

- *Whether the proposal, including when combined with the cumulative effect of other developments already permitted, would worsen air quality;*
- *Whether the development is within, or accessed via, an Air Quality Management Area; and*
- *Whether it can be demonstrated that a local worsening in air quality that would not detrimentally affect human health or the environment would be offset by an overall improvement in air quality, for instance through reduction in the need to travel".*

The Air Quality Assessment submitted with this outline planning application states that the application site lies more than 1 kilometre from the nearest Air Quality Management Area (AQMA) in Reading Borough.

There are two air quality issues that could potentially arise from the proposal: the impact of the development on local air quality and the suitability of the site for the proposals. The impact of the development may arise from the construction phase as well as road traffic emissions associated with any additional traffic from the new development. The suitability of the site for the proposed development, and therefore the need for mitigation, arises from the impacts of existing emission sources on the site; in particular, local road traffic emissions.

9.111 The AQA concludes that the construction works have the potential to create dust and mitigation measures will need to be put in place to reduce the risk of nuisance in the surrounding area. With mitigation in place the effects of construction are considered to be "not significant". Air pollution levels locally are low and the vehicle traffic created by the development is not likely to have a significant impact on local air quality. Mitigation in the form of 10% electric vehicle charging capacity will further reduce the risk of any impact on air quality from the development.

9.112 Consequently, it is considered that, with regard to air quality considerations, the proposal will comply with the relevant development plan policy and NPPF requirements.

Ecology

9.113 Policy EN12 Biodiversity and the Green Network states that:

"*a) The identified Green Network, the key elements of which are shown on the Proposals Map, shall be maintained, protected, consolidated, extended and enhanced. Permission will not be granted for development that negatively affects the sites with identified interest or fragments the overall network. The Green Network comprises:*

- *Sites with identified biodiversity interest - Local Wildlife Sites, Local Nature Reserves, Biodiversity Opportunity Areas, protected and priority species and their habitats, Priority and Biodiversity Action Plan habitats, and the River Thames and all its tributaries (including the River Kennet and the Kennet & Avon Canal); and*

The application site does not fall within any of these categories or designations.

- *Areas with potential for biodiversity value and which stitch the Green Network together – designated Local Green Space and open green spaces, and existing and potential Green Links.*

The application site is bisected by a Green Link, which connects Emmer Green in the south with the countryside to the north of the town. At present use of this Green Link is limited, because of the fact that the land is owned by a private club. However, once the site is developed, the Green Link will run through areas of Public Open Space and will link Emmer Green with further areas of POS, woodland and allotments to the north in the AONB. The Ecological Assessment and Landscape Strategy submitted with this application help to highlight the measures undertaken to increase net biodiversity on site.

New development shall demonstrate how the location and type of green space, landscaping and water features provided within a scheme have been arranged that they maintain or link into the existing Green Network and contribute to its consolidation. Such features should be designed to maximise the opportunities for enhancing this network. All new development should maximise opportunities to create new assets and links into areas where opportunities are as yet unidentified on the Proposals Map.

The application includes proposals to provide significant areas of Public Open Space, landscaping and water features, which will enable the site to be bisected

from east to west and north to south along the lines roughly envisaged by Policy EN12. Provision of water features, strengthening of existing long-grassed areas, additional tree and hedge planting and provision of a use that will encourage more planting of flowers and plants than has been the case with that associated with the golf course (which is regularly mown and treated for golfing, rather than ecological benefit) will enable greater biodiversity of a long-term beneficial context that will enhance the green network in the locality.

b) On all sites, development should not result in a net loss of biodiversity and geodiversity, and should provide a net gain for biodiversity wherever possible. Development should:

- *Protect and wherever possible enhance features of biodiversity interest on and adjacent to the application site, incorporating and integrating them into development proposals wherever practicable; and*

The site currently contains numerous features of biodiversity interest, including trees, hedgerows and small areas of long grasses. As much as possible, these will be retained and incorporated into the proposed development. A Landscape and Ecological Management Plan and Biodiversity Impact Calculation forms part of the planning application package, helping to define the approach to providing a minimum 10% net biodiversity gain in line with policy requirements.

- *Provide new tree planting, wildlife friendly landscaping and ecological enhancements (such as wildlife ponds, bird and bat boxes) wherever practicable.*

The application is accompanied by a Framework Masterplan and other supporting drawings, which show that the development will incorporate significant areas of Public Open Space, which will contain new tree and greenery planting, using native species, which will enhance the biodiversity of the local area. Ecological enhancements will also be incorporated into the scheme. More details are contained in the Phase 1 Ecological Assessment, which is submitted with the application.

In exceptional circumstances where the need for development clearly outweighs the need to protect the value of the site, and it is demonstrated that the impacts cannot be: 1) avoided; 2) mitigated or; 3) compensated for on-site; then new development will provide off-site compensation to ensure that there is "no net loss" of biodiversity. Provision of off-site compensation shall be calculated in

accordance with nationally or locally recognised guidance and metrics. It should not replace existing alternative habitats and should be provided prior to development".

The proposal includes significant on-site provision of Public Open Space, which will be policy-compliant. However, it is also proposed to convert 4.4ha of the Golf Course within the SODC land into a Parkland, woodland and allotments, which will be linked to the development site by a network of green cycleways and footpaths. These areas will be heavily landscaped and in an ecologically friendly way in order to encourage wildlife to remain in the local area.

9.114 Paragraph 170 of the NPPF *Conserving and enhancing the natural environment* states *inter alia* that:

"*Planning policies and decisions should contribute to and enhance the natural and local environment by:*

d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.

It is considered that the proposal, which includes significant areas of Public Open Space and the conservation of existing natural features, will result in substantial net gains for biodiversity, such as the planting of native flora species and provision of bat boxes, etc. These are set out in more detail in the Phase 1 Ecological Assessment and can be secured by the LPA by condition and at the Reserved Matters stage.

9.115 Paragraph 175 of the NPPF *Habitats and Biodiversity* states that:

"*When determining planning applications, local planning authorities should apply the following principles:*

a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused"

The proposal will result in development on what is currently a green space, which has an existing biodiversity value. This is recognised by the applicant. Therefore, significant biodiversity net gains are to be built into the development, including,

but not limited to, provision of areas of POS, retaining existing green infrastructure as far as practicable, new native species planting and provision of bat boxes. Off-site mitigation within the local area is also proposed to enhance the on-site offer and ensure delivery of an overall 10% net biodiversity gain within the Borough. The additional tree planting within the SODC land would form an additional benefit to this.

9.116 Consequently, it is considered that, with regard to ecology and biodiversity, the proposal complies with relevant development plan policies and NPPF requirements.

Archaeology and Built Heritage

9.117 Policy EN1 of the RBLP *Protection and Enhancement of the Historic Environment* states that:

"*Historic features, areas of historic importance and other elements of the historic environment, including their settings will be protected and where possible enhanced. This will include:*

- *Listed Buildings;*
- *Conservation Areas;*
- *Scheduled Monuments;*
- *Historic parks and gardens; and*
- *Other features with local or national significance, such as sites and features of archaeological importance, and assets on the Local List.*

All proposals will be expected to protect and where possible enhance the significance of heritage assets and their settings, the historic character and local distinctiveness of the area in which they are located. Proposals should seek to avoid harm in the first instance. Any harm to or loss of a heritage asset should require clear and convincing justification, usually in the form of public benefits".

An Archaeology and Built Heritage Statement is submitted with this application. This sets out how all archaeological and heritage features within a 1 kilometre range of the site have been assessed in the context of the proposed development. With regard to buried archaeological deposits, it is considered that there is a medium level of risk of impact during the construction phase. The presence of

buried archaeological deposits will be evaluated by a phased programme of archaeological works, which will be secured by means of a suitable condition on planning consent. In the first instance, however, and further to pre-application advice from Berkshire Archaeology, a Geophysical Survey has been undertaken to assess the subsurface archaeological potential of the survey area, the conclusions of which are that no anomalies suggestive of significant archaeological features were identified.

There are several Listed Buildings and a Historic Park within 1 kilometre of the site. However, it has been assessed that the impact of the development on these heritage assets will be negligible at both the construction and operation stages.

9.118 Policy EN2 of the RBLP *Areas of Archaeological Significance* states that:

"*Applicants should identify and evaluate sites of archaeological significance by consulting the Historic Environment Record. This will require an assessment of the archaeological impacts of development proposals to be submitted before the planning application is determined. Planning permission will not be granted in cases where the assessment of the archaeological impacts is inadequate.*

Where remains cannot be preserved 'in situ,' remains should be properly excavated, investigated and recorded. This will require adequate provision for the identification, investigation, recording and publication of the archaeological resource. Where appropriate, Section 106 agreements will be negotiated to protect, enhance and interpret archaeological remains".

As stated above, the Archaeology and Built Heritage Statement, which is submitted with this application, sets out how the developer will commission archaeological investigations as part of the development. If these unearth any remains, they will be excavated, investigated and recorded, as required by this policy. Normally, this methodology will be secured by the LPA by means of a suitable condition on the planning consent. However, further to pre-application advice from Berkshire Archaeology, a Geophysical Survey was undertaken to assess the subsurface archaeological potential of the survey area, the conclusions of which are that no anomalies suggestive of significant archaeological features were identified.

9.119 Policy EN6 of the RBLP *New Development in a Historic Context* states that:

"*In areas characterised by heritage assets, the historic environment will inform and shape new development. New development will make a contribution to the historic character of the area by respecting and enhancing its architectural and visual qualities and considering how heritage considerations can influence the design of new development. When determining planning applications for new development, the following factors will be taken into consideration:*

a. The positive contribution of the development to the existing historic townscape (scale, height, mass, proportion, plot size, street form, materials, significant vistas and views, and open space);

b. Sensitivity to historic context;

c. Reflection of borough-wide major heritage themes that contribute to local distinctiveness (e.g. patterned brickwork or former worker terraced housing);

d. Whether development promotes and/or improves access to previously undiscovered or neglected historic significance".

As stated above, the proposal will have a "negligible" effect on the setting of heritage assets in the local area. Therefore, the proposal complies with this policy.

9.120 Paragraph 189 of the NPPF *Proposals affecting heritage assets* states that:

"*In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation".*

As stated above, the application is accompanied by an Archaeology and Historic Assets Assessment, which includes proposals for the identification, recording and

preservation of any remains unearthed by the development. The council will be able to secure this process by a suitable condition on the planning consent.

9.121 Paragraph 192 of the NPPF *Proposals affecting heritage assets* states that:

"*In determining applications, local planning authorities should take account of:*

a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;

b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and

c) the desirability of new development making a positive contribution to local character and distinctiveness".

As stated previously, the development will have a "negligible" effect on local heritage assets. Therefore, all nearby heritage assets, including several listed buildings and a historic park, will be preserved in their entirety, as they will not be affected by the proposed development.

9.122 Consequently, it is considered that, with regard to the impact on archaeology and heritage assets, the proposal complies with relevant development plan policies and the requirements of the NPPF.

Sustainable Design and Construction

9.123 Policy CC2 of the RBLP *Sustainable Design and Construction* states that:

"*Proposals for new development, including the construction of new buildings and the redevelopment and refurbishment of existing building stock, will be acceptable where the design of buildings and site layouts use energy, water, minerals, materials and other natural resources appropriately, efficiently and with care and take account of the effects of climate change".*

The Sustainability Assessment submitted with this application sets out how the proposed Health Centre will meet the requirements of BREEAM "Very Good" standard, in compliance with this policy. Furthermore, the new dwellings will be built to accord with current Building Regulations, which require sustainable construction methods.

9.124 Consequently, it is considered that, with regard to sustainable design and construction, the proposal complies with the relevant development plan policy.

Energy

9.125 Policy CC2 (see above) requires new development to use sustainable design and construction methodologies, including the use of energy appropriately, efficiently and with care to take account of climate change.

9.126 An Energy Strategy is submitted with this outline planning application, which explains how the proposed development will comply with current standards for energy use, including the use of renewable energy.

9.127 Consequently, it is considered that, with regard to energy considerations, the proposed development complies with the relevant development plan policy.

Minerals

9.128 Within pre-application discussions that took place early in 2020, Officers highlighted that:

"Part of the resource is soft sand, which is something there is a considerable shortfall in across much of the south east. As such, I am flagging up the issue of mineral safeguarding and the requirement for a Mineral Resource Assessment to determine the extent to which the material can be extracted prior to development. This is due to Saved Policy 2 of the Replacement Minerals Local Plan for Berkshire says:

The local planning authorities will oppose development proposals which would cause the sterilisation of mineral deposits on the proposed development site, or which would prejudice the future working of minerals on adjacent sites, except "Where it is demonstrated that:

> *(i) the mineral deposit is of no commercial interest, and is unlikely to be so in the future; or*
>
> *(ii) having regard to all relevant planning considerations, there is an overriding case in favour of allowing the proposed development to proceed without the prior extraction of the mineral; or*

(iii) extraction of the mineral would be subject to such strong environmental or other objection that it would be highly unlikely that it would ever be permitted in any circumstances."

9.129 Against this policy context, a Minerals Resource Assessment (MRA) is submitted to consider matters further, with the conclusions demonstrating that both points (i) and (iii) apply to the site.

9.130 Section 4.3.3 of the MRA highlights that an estimated 51% of the Black Park Gravel Member at the Site is considered to comprise the mineral resource (sand and gravel grade). A geological model based on borehole logs and surface mapping indicates that an estimated 171,000 tonnes of Black Park Gravel are located within the Site boundary. However, if standoffs or buffers are considered (Section 5) this may reduce the available reserve to approximately 156,000 tonnes. This could be further reduced to 147,000 tonnes if the mineral less than 1 m thick is excluded from the resource for economic reasons.

9.131 The key constraints identified while assessing the opportunity to work the mineral at the Site include: relatively small tonnage, high silt/clay content, increased HGV traffic, requirement to import restoration material, environmental and socio-economic constraints (Section 5).

9.132 It is considered that the mineral tonnage would be insufficient to justify on-site processing. Off-site mineral processing may be possible however the high silt/clay content means potentially only ~50% of the processed mineral would be recoverable. Such a high silt/clay content is unlikely to be of commercial interest to local mineral operators. Off-site processing would potentially have additional environmental impacts associated with extraction (noise and dust) and traffic (noise, air quality and traffic movements).

9.133 Extraction would require import of material for restoration which also would have added impact of additional traffic movements, noise, dust and air quality.

9.134 Overall, the mineral within the Site is likely to have limited commercial interest. In addition, there are significant constraints and the extraction of the mineral would likely be subject to strong environmental objection.

9.135 Therefore, when assessed in the context of the prevailing RMLP Policy 2:

i. the mineral deposit is of no commercial interest, and is unlikely to be so in the future;

The relatively small tonnage of low-quality mineral resource would require significant processing and generate over 50% fines so unlikely to be of commercial interest to a mineral operator.

iii. extraction of the mineral would be subject to such strong environmental or other objection that it would be highly unlikely that it would ever be permitted in any circumstances.

The close proximity of residential properties and the potential environmental impacts of mineral extraction and export combined with the need to import restoration material is such that there is likely to be significant objection to any mineral extraction.

9.136 Therefore, the Project Team considers that it has completed the requirement to *"demonstrate that prior extraction has been fully considered, the developer must undertake an assessment of the practicality of prior extraction, either for use in the development itself or elsewhere".*

CIL and Section 106 contributions

9.137 Policy CC9 of the RBLP *Securing Infrastructure* states that:

"*Proposals for development will not be permitted unless infrastructure, services, resources, amenities or other assets lost or impacted upon as a result of the development or made necessary by the development will be provided through direct provision or financial contributions at the appropriate time".*

As stated under various headings above, this outline planning application includes proposals, which will provide infrastructure as part of the development, including roads, junction improvements, footpaths, cycleways, Health Centre, an on-site LAP and public open spaces. Contributions to implement off-site improvements to local parks and children's play areas are also proposed within RBC.

In addition, the applicants will work with the LPA to identify any further infrastructure improvements that may be required as part of the development or funded by the development by means of contributions, such as education improvements, community facilities and environmental improvements in line with RBC's Planning Obligations under S106 SPD.

In particular, discussions with RBC have identified the need for contributions towards an accessible play facility and it is thought that this could be provided as part of an upgrade to Emmer Green Recreation Ground. Furthermore, discussions with Sport England have highlighted the potential for contributions to be used towards provision of 3G playing pitches in North Reading. Infrastructure improvements and funding that accord with NPPF Paragraph 56 tests will be secured for the LPA by means of a section 106 agreement, which will be entered into by the applicants in partnership with the LPA.

9.138 The Reading Borough Community Infrastructure (CIL) Charging Schedule was published in January 2015. The charges are set out in the table overleaf.

9.139 The proposal includes residential development, which could be charged at £120 per sqm (currently indexed to £156.71), while the new Health Centre will be charged at £nil per sqm. It should be noted that affordable housing is also charged at £nil per sqm. Furthermore, the amount payable is index-linked using the RICS All-In Tender Price Index figures for the year in which planning permission is granted. Given the size of the development, it is likely that CIL payments will be made in instalments, following commencement of development, which will be agreed with the LPA at the appropriate time.

Use	Charging Zone Location	Charge £/m^2
Residential / Hotels / Sheltered Housing/ Private Rented Hostel Accommodation (including student accommodation)	Boroughwide	£120
Care homes (those providing nursing care and fully catered)	Boroughwide	£0
A1 Retail	Central Reading*	£0
A1 Retail of 2000m^2 and over (including foodstores)	Remainder of Borough	£150
A1 Retail of under 2000m^2 (including foodstores)	Remainder of Borough	£0
Offices	Central Core**	£30
All other chargeable developments	Boroughwide	£0

Figure 13 – Extract RBC CIL Charging Schedule.

9.140 On the basis of the current accommodation schedule and CIL index, the scheme will indicatively yield in the region of £3,820,433.09 of CIL payments to help meet with infrastructure and service delivery both locally and within the Borough.

9.141 Consequently, it is considered that the proposal complies, regarding the provision of infrastructure and CIL payments, with the relevant development plan policy and SPD guidance.

9.142 Additional commitments, which are not considered to be required for the development to proceed in line with NPPF Paragraph 56 tests, are also offered voluntarily by the applicant as part of the commitment to provide a sustainable and active legacy on the land to be vacated. In this manner, provision of new woodland comprising a minimum of 1,000 trees, a parkland, walking and cycling links and allotments on part of the RGC land in SODC is proposed. These works do not require planning permission and proposals for the management and maintenance of this land and facilities has been set out elsewhere in this document.

9.143 As the land is to be given on a voluntarily basis and is not required to support the application in planning terms, there is no absolute requirement for such works to form part of the legal agreement with RBC. Nevertheless, in terms of the applicant's commitment to provide a meaningful legacy, proposals are made within this document to ensure that the necessary controls can be put in place to ensure responsible ongoing management and the applicant welcomes post-submission discussions with RBC in this regard.

9.144 To summarise, the proposals will deliver:

- CIL payments
- 600 sqm of Community Infrastructure, identified for a Health Centre
- Additional contributions as identifiable through the Planning Obligations under S106 SPD
- Further voluntary contributions on land within SODC

Performance against Infrastructure Delivery Plan objectives

9.145 Figure 10.2 of the RBLP sets out a series of Borough-wide and localised improvements to physical, green and social and community infrastructure that the Council aspires to deliver within the plan period. The proposals at RGC help to achieve several of the Infrastructure Delivery Plan (IDP) objectives, including:

Physical Infrastructure

- Cycle Hire – the applicant is willing to provide contributions to enable provision of bike hire facilities at the Health Centre

- Cycling strategy – the proposals, both within RBC and SODC will enable significantly improved connectivity between Emmer Green and Caversham, providing an opportunity to cycle on both dedicated paths within the site and then via linkages through SODC land to the NCN, as well as a connecting route from Kidmore End Road to Bugs Bottom which will help provide significantly-enhanced opportunity for walking and cycling in North Reading

- Public Transport and Enhancements – provision of the Health Centre on the Kidmore End Road frontage, alongside contributions to public transport provision will help to achieve the central objective of increasing attractiveness of public transport

- Walking Strategy – as has been evident during the lockdown, use of the land for walking is both attractive and well-used. This is only possible via the development as the land is otherwise private and inaccessible as noted in the EV033 Background Paper assessment. Provision of walking links through the site and into SODC, connecting north, south east and west through the site, will allow for significantly higher connectivity within the area and more readily available access to the PROW network and green space.

- Berkshire Superfast Broadband – in line with Sections 4.2 – 4.5 of the Superfast Broadband Strategy submitted there are a range of options for the delivery of superfast broadband at the Proposed Development. It is considered at this stage that BT Openreach provides the optimum service for the site, helping to achieve well above the minimum level of service required by policy.

Green Infrastructure

- Open Spaces Strategy – the applicant has committed to provide dedicated, accessible open spaces within the development site totalling c. 3.6ha in size. This is complemented by 4.4ha of parkland, woodland and allotment uses, provided voluntarily, which will also help to link areas to the east of

the golf club with open spaces that are within a desired 400m walking distance, as identified within Figure 2 of the RBC Open Spaces Strategy 2018 Update Note.

- Green Infrastructure/Access to Open Space – as identified within this document, most notably within the response to Policy EN8, the proposals provide access to open space, so that it is usable, and therefore beneficial to the local populous and not simply those that enjoy a view over it or play golf upon it. This represents a significant local benefit that can be enjoyed by the residents of Emmer Green and Caversham; something that was evident during lockdown prior to golfing activities resuming. Significant thought has been given, not only to provision of on-site open spaces, but also as to how these can be linked through the site into the wider area, as well as to other green spaces such as Bugs Bottom.

- Play Requirements – The proposals identify significant opportunity for formal and informal play directly associated with the proposals. In line with discussions held with RBC and also Sport England, it is suggested that contributions are identified towards upgrade of Emmer Green Recreation Ground, which could provide for RBC's long-standing aspiration to implement a new, accessible playground within the Borough. In addition, contributions towards MUGA provision could be put towards the creation of 3G pitches in the locality, as advocated by Sport England in its pre-application response.

- Biodiversity Plan – the proposals enable the creation of the north/south and east/west green link identified within Policy EN12. The applicant is also committed to provision of a 10% net biodiversity gain within the development site through the measures set out in Section 6 of the Ecological Impact Assessment supporting the planning submission.

- Allotment Creation and Enhancement – the IDP identifies a need to improve allotment provision, where there are only 20 allotment sites available within the Borough and waiting times are significant, especially in the North and West, as evidenced at https://www.reading.gov.uk/allotments which identifies a 5.5 year waiting time for facilities at Grove Road, Emmer Green[12]. Whilst the allotment

[12] This having increased from 4.5 years from the point of the submission of the earlier planning application in June 2020.

facilities provided will be within SODC, they will be located closest to the population at Emmer Green and the intent is for this facility to be provided on a commensurate basis with those provided by the Council. Discussions with RBC will be undertaken to identify how best to manage and maintain these facilities, but our initial thoughts are as set out in paragraph 6.17 – 6.26 of this document. The provision of 0.41ha for allotment use, should help to supply in the region of 16 new pitches, on the basis of a standard 250 sqm pitch.

Social and Community

- General – CIL contributions, topped up by S106 commitments (as appropriate under NPPF Paragraph 56 tests) will help to provide for education and police service provision. In addition, it is proposed to provide a c. 600 sqm Health Centre on site, to shell and core, for use by the local NHS CCG. Discussions with this body and Emmer Green Surgery will continue during the planning process to identify requirements and to define the principles of use for this building.

10. CONCLUSIONS

10.1 The application site is a sustainable location for development. There is a presumption of favour of sustainable development embedded in the planning system. Development must accord with development plan policies unless material considerations indicate otherwise.

10.2 In this case, the proposals will comply with the key development plan policies, and in particular, local plan policies RL6 and EN8.

10.3 Policy RL6 states that existing leisure facilities, such as Reading Golf Club should be retained, subject to *inter alia* there being no need for this type of facility in this area or the function of the facility being fulfilled elsewhere within the same catchment.

10.4 In this case, loss of this leisure facility is justified, because there is an over-supply of golf courses in and around Reading; the function of RGC will be taken over by CHGC, which is being upgraded for this purpose and with c. 3.6ha of the golf course proposed to be converted into public, as opposed to currently private, open space, the community will benefit from this change to a significant degree alongside the provision of additional and enhanced local leisure and community facilities. Inclusion of SUDs within this figure provides for 4.1ha of publicly accessible open spaces on site.

10.5 As part of the pre-application process, discussions have also been held with Sport England and England Golf regarding the proposals at both RGC and CHGC, with both organisations concluding that the move from RGC to CHGC can be supported for the reasons set out throughout this document.

10.6 Policy EN8 states that Undesignated Open Spaces, such as Reading Golf Club, should be retained. However, it goes on to state that:

Development may be permitted where it is clearly demonstrated that replacement open space, of a similar standard and function, can be provided at an accessible location close by, or that improvements to recreational facilities on remaining open space can be provided to a level sufficient to outweigh the loss of the open space.

10.7 In this case, Reading Golf Club is a private sports facility, which currently can only be enjoyed by c.500 fee paying members. The redevelopment of the application site is accompanied by a proposal to considerably upgrade CHGC,

which is located very close to RGC, and relocate members to this substantially improved facility. This has been possible, because golf, as a participation sport, has declined considerably in recent years and there is now an over-supply of golf courses in the UK.

10.8 In addition, the proposal includes significant areas of Public Open Space, both within the development area and on land to the north, which will include a new Parkland, Woodland and Allotments, with access provided via new and improved cycleways and footpaths. Furthermore, a new children's play area will be provided in the main central area of POS and an existing local children's play area will be improved. Separate to this planning application, a family golf centre is also in the process of being prepared on the existing golf course land within SODC.

10.9 The LPA acknowledges that there is a "pressing need" for new homes in Reading Borough, especially family-sized homes and there are questions regarding the ability of some sites in the Local Plan to provide the quantum and type of housing required to properly meet this need. In this context, the majority of the new homes on the site will have at least 3-bedrooms and private gardens, which will be highly suitable for families. Furthermore, 77 of the proposed 257 homes will be affordable, which will help to meet the local need for families who cannot afford to purchase their own homes outright and will make-up for under-provision coming forward on other allocated sites.

10.10 The density of development and the proposed mix of house types and sizes will be compatible with the local area, whilst making efficient use of the land.

10.11 The layout and design of the development will be of high quality and in keeping with the character and appearance of the local area. The proposal will include the retention of as many trees and other natural features as possible, as well as the provision of new planting, so that the development will be extremely sylvan and attractive in character and appearance, which will be beneficial, as it lies in a low to medium density suburban location.

10.12 The amenities of adjoining residential properties will be preserved as much as possible. Although a small number of properties may lose views across open land, which is privately owned and to which they have no legal entitlement, the proposal will include low density housing and considerable planting around the edges in order to provide a green buffer, which will considerably soften the

impact of the new development. This will ensure that existing residential amenities will not be unduly harmed by the development.

10.13 The new homes will be built to current standards, including satisfactory levels of internal space and external amenity. High quality materials will be used to ensure that the development is in keeping with the character and appearance of the local area.

10.14 New roads, footpaths and cycleways will be provided on site in compliance with council standards to ensure that the site is safely accessible and linking it to the surrounding highway network. Further links are proposed to significantly improve accessibility in, between and around the local area for walking and cycling opportunities.

10.15 The site is located close to existing facilities in Emmer Green and a new Health Centre will be provided as part of the development. The site is also located close to existing bus stops, so that future residents will have the option of accessing Reading Railway Station and Town Centre without need to use the private car. Furthermore, it may be possible to extend local bus routes to include the new development and further improve the connectivity of the site.

10.16 The proposals help to deliver on a very significant number of IDP aspirations, which include the deliverance of designated, accessible and usable public open space, which in turn help to deliver marked enhancements in walking and cycling connectivity within the local area.

10.17 With regard to other considerations, such as flood risk, drainage, trees, ground contamination, air quality, noise, vibration, ecology, archaeology, heritage, CIL and infrastructure provision, the proposal will comply with relevant development plan policies and NPPF requirements.

10.18 Overall, it is considered that the proposed development is acceptable in planning terms and it is therefore respectfully requested that planning permission be granted expeditiously.