

Briefing

Reading Golf Club – Planning and S106 matters for consideration

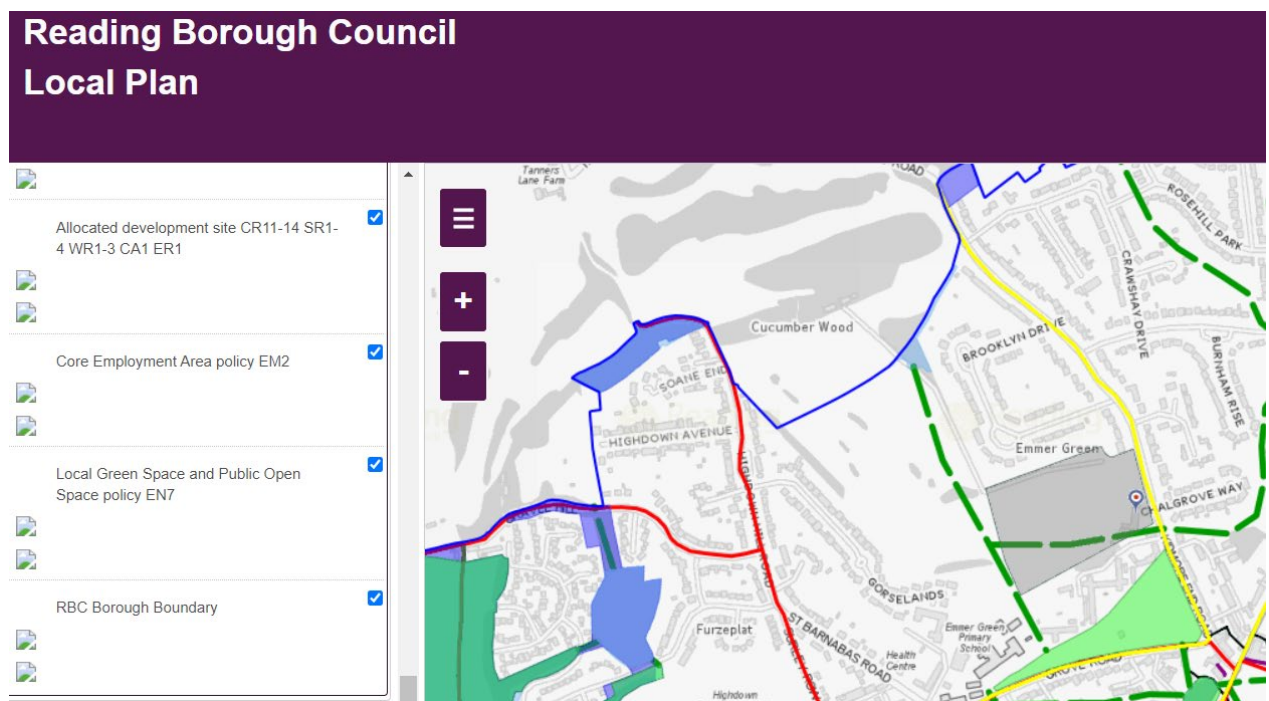
24th June 2021

Introduction

1. This note has been produced further to comments provided by RBC Officers on 22nd June 2021 with the intent of clearly demonstrating that the proposals at Reading Golf Club are policy-compliant, well-considered, appropriate to the locality and have appropriate levels of mitigation proposed where identified as necessary through consultation.
2. Attention is also given to areas where the proposals exceed policy requirements and/or resolve existing issues in the locality.
3. Reading Golf Club and Fairfax wish to work proactively with the Council to identify the means to support what is a robust application, built around a policy allocation, on land which requires something to be done to ensure long-term stewardship and appropriate legacy.

Principle of Development

4. The extract of the Local Plan policies map identifies the following:



- The site sits within white land within the Borough (Settlement) boundary, save for land already allocated within the Local Plan under Policy CA1b.
- The land is not designated as Public Open Space or Local Green Space under Policy EN7. As identified in the Council's Open Space Strategy, this was on account of its inaccessible nature.
- The site has a designated green link under Policy EN12 to link through to the Local Wildlife Site located in the north-eastern corner of the site.
- The site is well located in terms of proximity to a local centre, primary and secondary schools, a health centre and the public transport and cycle networks.

Deviation from Policy CA1b

5. The Golf Club has sought to be open and honest about its position over the past three years. During the Local Plan, after the hearings, but before Main Modifications Stage, the Golf Club wrote to the Council to inform the Council and Planning Inspector of a change of approach, despite this potentially jeopardising the site allocation. The reasons for this change were:
 - The initial developer had changed their offer in the face of the High Court challenge between KEG and the Golf Club. This meant no money would be available until after any consent, undermining any possibility of purchasing another club to move to.
 - Sonning Golf Club, the initial destination, did not materialise.
 - The initial Local Plan submission was made on the grounds that Sonning Golf Club did not have significant practice facilities and therefore some golfing uses needed to be retained on site to allow Reading Golf Club members a full golfing offer.
 - Subsequently Caversham Heath Golf Club was purchased. Given the space available on site, there was no need to retain golfing facilities on site and submissions were made to the Planning Inspector and the Council to make this change apparent.
6. Policy advice given during pre-application stages that we essentially ignore Policy CA1b and submit a planning application for determination under the other policies of the Local Plan was taken. Our policy compliance checklist identifies complete adherence to all aspects of policy, whether outright or via proposed mitigation.

Policy EN8

7. Our previous application was withdrawn in November 2020 and in our resubmission on 6th January 2021 a robust response to set out scheme adherence to Policy EN8 was made and it is clear that both policy tests can be satisfied through:
 - Replacement space that is more accessible to both adjacent landowners and the neighbouring locality.
 - Provision of S106 contributions towards a 3G pitch within RBC and upgrading of Emmer Green Playing Fields.

8. The land at the golf course within RBC needs to be seen for what it is; fairly benign and non-biodiverse golf course land that until recently was treated and closely mown for golfing use. The land is inaccessible to local residents and only limited visual amenity can be attributed to it, as demonstrated in the attached 'Neighbouring Views' plan. This assessment has taken a conservative approach to availability of views and also assumes a post-development position alongside winter views.
9. There is 11.44ha subject to Policy EN8, the other land within the golf course comprising the clubhouse and car park. Of this:
 - 4.11ha (36%) will be retained as Public Open Space, SuDS or street planting.
 - 3.4ha (30%) will be retained as front or rear garden space, similar in terms to the existing 'green space' – partially visible, but inaccessible to the public.
 - 3.93ha (34%) will be developed in terms of built form and infrastructure.
10. The proposals at RGC will result in more on-site, higher value trees, a net biodiversity gain, accessible POS and a LAP being provided.
11. The approach to provision of Green Space is as shown in the attached 'Green Space Plan' and 'Green Space Plan – Policy EN8'. One plan identifies the delineation of spaces, whilst the other the amount of 'green space' retained across the site.
12. The locality is recognised as being in an area of Open Space deficiency and North Reading is identified in the Local Plan as having a deficiency in play spaces. The proposals in this manner provide an absolute uplift in both criteria.
13. Planning obligations to provide investment to Emmer Green Playing Fields and towards provision of a 3G pitch not only provide further balance in favour of the planning argument, they enable a significant investment for future generations in Emmer Green.
14. Policy EN9 and RL6 are separate requirements, with their own tests, and should not be conflated with Policy EN8. The quantum of spaces provided on site and response from Sport England very clearly identify policy adherence in terms of Policy EN9 and RL6.
15. Taking the above into account, it is considered that the requirements of Policy EN8 can be satisfied by the proposals solely within the RBC land.
16. Notwithstanding this, the applicant is also willing to discuss measures in respect of other land within its control for the benefit of local residents,

Affordable Housing

17. The proposals enable very significant affordable family homes, and in particular houses, to come forward. This is an acute need as identified in the Draft Affordable Housing SPD (DAHS).
18. The proposals currently identify a policy-compliant 77 units (30%) to be provided as affordable housing. Of this, of the affordable allocation, 60 units (77.9%) are provided as houses and 48 units (62.3%) are provided as 3 bed+ houses.

19. Taking into consideration matters raised by officers in discussion with us on 22nd June 2021, and in light of the Council's acute housing need and shortfalls in delivery, the applicant has chosen to **increase** the provision of **on-site affordable housing** from 30% to **35%, providing 90 affordable homes** instead of the policy requirement of 77.
20. This is an exemplar offer, which should be put into context against recent Council delivery, as set out in the DAHS:
- 2020: Target of 503 affordable homes per year
 - 2013-20: 648 affordable homes delivered
 - “Over the period of the Local Plan so far (2013-2020), 648 new affordable homes have been delivered, which equates to an annual average of 93 homes. It is therefore clear that the supply is falling some way short of the assessed need of 406 per year. It is therefore essential that all sources of affordable housing are maximised”.
21. Provision of these 90 affordable homes would equate to 97% of the annual average of all units provided across the Borough over the past 8 years.
22. Importantly, the units being provided meet the acute need highlighted in both the SHMA and the DAHS.

Housing

23. The Local Plan states that approximately 700 dwellings are to be delivered in North Reading, equating to 35 dwellings per annum over the plan period. Nevertheless, the Local Plan only identifies sites for up to 365 dwellings. The AMR states that 106 dwellings have already been completed over the plan period, but this is behind the target per annum, equating to just over 15 per annum. Only 6 dwellings were delivered in the last reporting year, and this was pre-pandemic for all but the last couple of weeks of the period. On this basis, housing delivery in North Reading is clearly falling behind target.
24. Furthermore, when the completions and the Local Plan allocations are combined, totalling 471 dwellings, this falls short of the 700 dwellings targeted in the Local Plan for North Reading by some 229 dwellings.
25. Proposed changes to the Government's Standard Methodology also potentially require the Council to deliver a further 187 homes per annum, which may threaten the 5YHLS position and also certainly require densification of development sites and/or release of further land for development.
26. Delivery of the South Reading housing sites will either not achieve the numbers identified by the Council or will fail to provide the family and affordable housing desired; the nature of land ownerships, neighbouring industry and fragmented regeneration required make it difficult to achieve in this regard.

27. Taken from the AMRs since 2016, the permitted housing by mix is as follows:

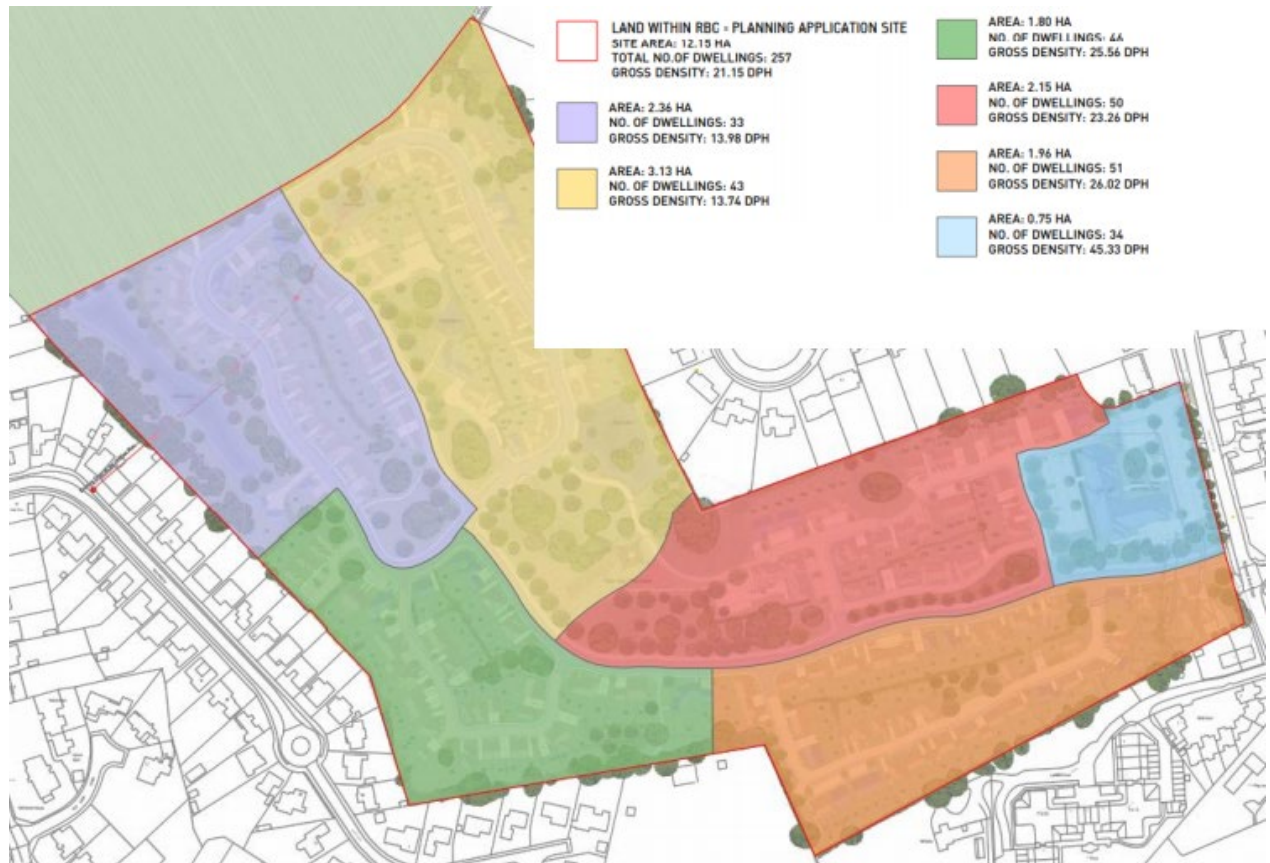
Year	1 Bed units	2 Bed units	3+ Bed units
2019/20	79%	18%	3%
2018/19	40%	48%	12%
2017/18	46%	46%	8%
2016/17	32%	46%	22%

* AMR figures rounded

28. It is clear from the above that the need to deliver larger 3+ bed housing will likely to have increased given the provision that will be coming forward in the Borough being overwhelmingly 1 and 2 bed, and predominantly as flatted development.
29. By contrast to the recently permitted development within the Borough, the proposed development at RGC proposes 63.8% of total accommodation as 3+ bed houses, a significant provision, in line with identified needs in the SHMA.

Density

30. The development represents a gross density of 21.15dph or a net density of 32.0dph if removing 3.53ha of Public Open Space, 0.49ha of SUDs and 0.09ha of street planting from calculations. In terms of Council policy, the net density sits just above the bottom of the density range given within Policy H2.
31. It is clearly identified within supporting text to Policy H2 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*'.
32. 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, it is also entirely appropriate to adopt such an approach.
33. Looking further at the housing proposals, densities are skewed by provision of flats over the health centre, as shown in the figure overleaf. 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 30.5dph, 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 and Policy H2.
34. Our very low density, sitting just above the bottom of Policy H2's range, has been guided by the densities in the surrounding area. Our legal team have reviewed our proposal and confirmed that we are policy compliant but that if the density was lowered any further it would be contrary to Policy H2.



Healthcare

35. The proposals have been subject to very significant consultation with the CCG, via Emmer Green Surgery (EGS). Discussions have highlighted a preference to extend the current health facility through purchase of a site next door to EGS. A pre-application submission was made and advice given, ref: 201471. On the basis of this advice, it is clear that a health centre could be delivered off-site; EGS has access to an existing 25 space car park which will reduce hard landscaping within the proposed development site and changes can be made to built form to accommodate a more satisfactory access.
36. The applicant is not in control of this third-party land and delays in receiving pre-application advice from the Council have meant that the adjacent property is currently on the market for sale (although not under offer).
37. Policy CA1b requires on-site provision and so this can be satisfied through the existing proposals. Should off-site provision be preferred, and deliverable, a commensurate sum towards this will be given.
38. It is noted that discussions between the applicant, Council and CCG will be required to determine the sums necessary to cover off-site delivery and the apportionment of contributions between these parties; the Council are able to support this through CIL and the CCG through funding.
39. The size of the health centre required in terms of rooms, use and therefore floorspace has been determined during the course of discussions with EGS.

40. It is proposed that this matter is controlled via the S106, which will specify on-site provision of the identified floorspace or provision of a commensurate sum towards off-site provision.
41. Should the latter be selected and negotiations satisfactorily concluded, a S73 application would need to be submitted to amend the on-site proposals.
42. Should it not be possible to conclude negotiations to enable off-site provision, the Health Centre will be built out as proposed and offered for this use. Given the acute need in the locality it is expected that this accommodation will be utilised in line with that envisaged in Policy CA1b.
43. A mechanism within the S106 will be employed to govern this process, including the timeframe for which any on-site health centre should be marketed before any alternative uses can be considered. It is also expected that, given the Policy CA1b allocation which identifies a need for 'Community Infrastructure', that the marketing process would be taken forward in two stages to allow for other qualifying uses to be explored before any open marketing of the site is considered.

Energy

44. The approach to the site seeks to reduce energy consumption through appropriate design measures, in this case, adherence to higher 'u-value' standards, plus provision of PV arrays and Air Source Heat Pumps (ASHP) on properties throughout the site. This approach ensures an 83% reduction in CO2 emissions over a Part L compliance baseline for the proposed homes, with a net 75 TCO² per annum liable for an offset payment to comply with Reading Policy H5 (£135,000).
45. Decentralised heating was considered, but discounted for a number of reasons including:
 - Distribution losses - CP1: Heat Networks: Code of Practice for the UK sets the target for 10% distribution losses which is challenging for designers to achieve on schemes, and in reality is often exceeded in operation. Even on schemes where a 10% distribution loss target is met – this is still a significant loss of energy. The proposed local generation of heat for the dwellings reduces these transmission losses.
 - Development Density - District heating networks are more feasible where there is a higher density of development - for example, in large apartment blocks. This is linked strongly with the issue of distribution losses.

Biodiversity

46. A significant exercise has been undertaken to determine how to achieve a 10% net gain in biodiversity associated with the project. The current approach, as submitted in May 2021 is as follows:
47. The development will see the provision of the following new habitat:
 - 0.5ha of new wet grassland (SuDS) – on-site
 - 0.4ha of new species-rich grassland – on-site
 - 120 new trees – on-site

- 430m of new species-rich hedgerow – on-site
- 1ha of new species-rich grassland – off-site
- 0.53ha of new mixed scrub – off-site
- 12 new trees – off-site
- 0.41ha of urban allotments – off-site

48. This approach allows for the creation of 3.79 Habitat units totalling a 11.89% net gain. The linear feature calculation for the proposed scheme results in a likely gain of 2.66 Hedgerow units totalling a 106.18% net gain.
49. We have proposed three solutions for the proposed off-site biodiversity provision, either:
- A commensurate financial contribution is paid to RBC via the S106.
- or
- It is delivered on land within RBC's control. This approach is as set out in our earlier January 2021 LEMP and BIC submission.
- or
- It is delivered on neighbouring land within the Golf Club's control in SODC. The Council's BAP identifies that it is acceptable to provide offset within adjacent authorities, with SODC being one of those named. This approach is as set out in our latest May 2021 LEMP and BIC submission.
50. It is notable that the above net gain calculation does not take into account any biodiversity value gained by the planting of 1,000 trees.

Trees and Transport

51. We have responded to ongoing advice from RBC Officers, providing further detail to assist with queries, as well as changes to the layout to accommodate comments made. Officers' comments offered 'on balance', particularly in the case of the trees comments where this was clearly stated, and it is considered that subsequent responses made by the Project Team ensure that policy requirements and technical and environmental mitigation requirements are met.

CIL

52. CIL will be based on the current schedule rate of £156.71 per sqm, levied on 17,854 sqm (GIA) of private residential floorspace, as set out in the current Schedule of Accommodation, Rev.G. There is £0 charge on the 600 sqm health centre floorspace.

Initial Heads of Terms for Section 106 Agreement

53. The information given above helps to set out the policy position and the performance of the site against prevailing policy. To supplement this, it is expected that a number of planning obligations will be required. Our offer for discussion is therefore as follows:

1. Provision of 35% on-site Affordable Housing at a tenure split of 50:50 (Affordable Rent / Shared Ownership) in line with the current Affordable Housing SPD 2013.
2. Provision of a 600 sqm health centre or a commensurate sum towards off-site provision.
3. Provision of off-site bio-diversity mitigation or a commensurate financial contribution towards such off-site provision.
4. A contribution of £135,000 to the Carbon Offset Levy to comply with Policy H5.
5. A contribution of £250,000 towards provision of 3G sports pitch provision, as per Sport England request.
6. A contribution of £50,000 towards upgrade of Emmer Green Playing Fields Play Equipment.
7. A contribution to Employment, Skills and Training of £62,470 (Band 9), based on a construction value of £76.8 million.
8. A contribution to Employment, Skills and Training monitoring of £6,134.40
9. A contribution towards S106 monitoring of £5,000
10. A contribution towards RBC Legal Costs of £10,000
11. A contribution towards provision of Public Art of £25,000
12. Off-site highways works and improvements, comprising:
 - Improvements to Kidmore End Road Access, plus new bus shelter and levelled access - drawing number 45675/5510/001A
 - Provision of a secondary access to Kidmore End Road, including informal crossing with tactile paving - drawing number 45675/5510/003.
 - Improvements to the Kidmore End Road / Peppard Road junction - drawing number 45675/5510/006
 - Improvements to the Kidmore End Road / Lyefield Court and Kidmore End Road / Grove Road junction - drawing number 5675/5510/004
 - Upgrading the signal junction at the Peppard Road / Henley Road / Prospect Street junction to MOVA. Exact amount to be agreed during S106 negotiations and once further information from RBCs Network Management team has been provided.

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24th June 2021

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