

**Caversham
And
District
Residents
Association**

To the Planning Inspectorate

Copies to Planning Department of
South Oxfordshire District Council and
Reading Borough Council

5 Derby Road
Caversham
Reading RG4 5HE

helenlambert@btinternet.com
0118 947 3165

20th November 2017

Dear Sir,

**Planning Application No. P16/S3630/O Residential development between
Peppard Road and Kiln Road, Eye and Dunsden/Emmer Green**

Planning Appeal APP/Q3115/W/17/3185997

We refer to the Planning Application for a residential development of up to 245 dwellings (including up to 40% affordable housing), structural planning and landscaping, informal public open space and children's play areas, vehicular access from Peppard Road and Kiln Road and associated ancillary works. All matters reserved with the exception of the main vehicular access.

Responding to the appeal submitted, CADRA wishes to restate serious concerns about this application, particularly in the light of the emerging Reading Local Plan and believes that it should be rejected. Our reasons are detailed here.

1. SODC Planning Policy and Strategy

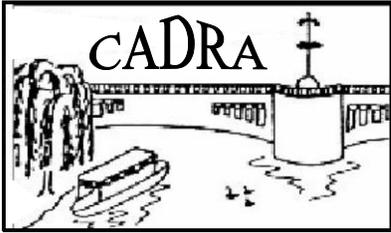
1.1 SODC Local Plan

In 2014 SODC consulted on the option of locating housing adjacent to the edge of Reading.

http://www.southoxon.gov.uk/sites/default/files/2014-06-05_SODC%20LP2031%20ISSUES%20&%20OPTIONS%20DOCUMENT%20final.pdf

Option F: Next to neighbouring major urban areas

“Our rural district lies immediately adjacent to the major town of Reading and the city of Oxford. Here there are many employment opportunities as well as universities, regional hospitals and bigger shopping centres. One option would be to put our housing growth on the edge of these neighbouring urban areas.”



Caversham And District Residents Association

This option had already been specifically rejected in the South Oxfordshire Proposed Submission Core Strategy December 2010:

“7.22. As part of our distribution strategy we have considered land outside Reading. Some of this lies within the floodplain and other areas within the Chilterns AONB. Further development focused on Reading would increase the pressures on the constrained bridges crossing the Thames and the strategy does not therefore provide for urban extensions to Reading.”

1.2 Planning Inspectorate review of SODC Core Strategy

In October 2012, the Planning Inspector examining the SODC Core Strategy reported:

http://www.southoxon.gov.uk/sites/default/files/Report%20_final_.pdf

106. Turning to the CS coverage of Thames crossings, there has been ‘considerable pressure’ for a new bridge near Reading, but OCC and SODC do not consider that a convincing case has been made for a bridge as an appropriate solution to cross-river issues in that area. However, policy CSM1(iv) commits them to continue current working arrangements with other local authorities affected by cross-Thames travel near Reading. The CS is therefore sound on this point.

1.3 Refined Options

The Refined options document February 2015, confirmed Option F as not appropriate.

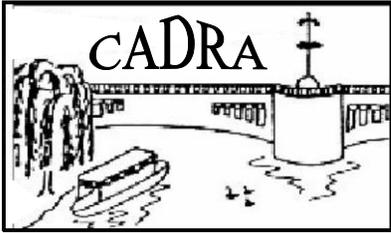
http://www.southoxon.gov.uk/sites/default/files/2015-02-02_SODC%20LP2031%20REFINED%20OPTIONS%20DOCUMENT%20Final%20web%20ready_1.pdf

Option F: Next to neighbouring major urban areas. As with ‘Option D’, this is not likely to be the most appropriate way deliver the new homes required for South Oxfordshire. However, it could help accommodate unmet need from Oxford.

1.4 Summary of current planning policy

All current SODC planning policy relating to land adjacent to the Reading boundary has been limited to small, exceptional development, except for specific provision for development in existing larger and smaller villages.

This application for 245 new homes, adjacent to the Reading boundary and separate from existing SODC settlements is therefore clearly contrary to both adopted and emerging SODC planning policy.



**Caversham
And
District
Residents
Association**

2. Relationship with Reading

The SODC Committee report, the Reasons for Refusal, and the submissions of the Principal Parties, all focus heavily on the policies of the South Oxfordshire Local Plan(s) and the adequacy or otherwise of the housing land supply within it.

Important as that may be, we suggest that at least as pressing a strategic planning issue is the relationship of the appeal site to Reading and its impact on Reading's Local Plan policies.

The site physically abuts the Reading boundary, and Reading's housing areas extend right up to it. This proximity, the structure of local transport, health and schools, the retail offer and Reading's huge pull as an employment centre all mean that, if developed, this site would in all practical respects function as an extension of Reading. The administrative boundary of SODC would have no real impact on that.

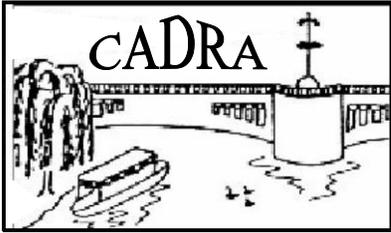
We make three points in this respect.

2.1 Reading Housing Need

Firstly, Reading has no need in planning terms for such an extension. Reading's Pre-Submission Draft Local Plan (November 2017) identifies a need for 16,077 new homes for the 2013-36 period. It defines locations for 15,433 (96%) of these within the Borough boundary (para 4.4.4). We understand that at least 90% of these are, consistent with the NPPF's priorities, on brown field sites, (para 4.4.3 refers) where the often more challenging development economics could be undermined by competing ad hoc green field releases like the current proposal. The Local Plan sensibly locates the remaining requirement which cannot be met within Reading's boundaries (644) to the south and west of the town, where transport infrastructure is best suited to accommodate it. Para 4.4.5 refers to a need for agreement with other Councils in the HMA to accommodate this; para 4.9 of the covering report to Reading's 22nd November Strategic Environment, Planning and Transport Committee records that a Memorandum of Understanding has been signed with these authorities to accommodate this need.

2.2 Appropriate Location

Secondly, if an ad hoc extension of Reading were to take place over and above the needs defined in the Local Plan, the very last place this should happen is north of the Thames – the area covered by CADRA. The major part of Reading, and the large majority of its employment and retailing, lies south of the river and is accessible from the north by only two river bridges. These bridges and their approach roads are notoriously congested within and often outside peak hours. Traffic to one of them, Caversham Bridge, passes through and severely impacts on the historic core of Caversham – a Conservation Area currently in the process of re-appraisal and extension. Development north of the river has historically respected the topography, occupying



Caversham And District Residents Association

the steep slopes up from the Thames and linked valleys up to a natural ridge line. This proposal oversteps that ridge and breaks out into open countryside.

2.3 Impact on North Reading

Thirdly, the wider impact of this development beyond its immediate locality would be felt primarily by north Reading - Emmer Green and Caversham - rather than by wider South Oxfordshire. As para 8.2.5 of the Reading Local Plan remarks, with specific reference to Caversham and Emmer Green: *"The adequacy of infrastructure to support additional development remains one of the most significant concerns in the area."*

The balance of our submission addresses those impacts.

2.4 Transport Links

2.4.1. Thames Crossing

No work appears to have been undertaken to show the possible additional trips across the Thames to and from the development. The cumulative impacts of developments in SODC have contributed to a significant worsening of traffic conditions in Emmer Green, Caversham and Reading.

Recently Wokingham District Council, together with: Reading Borough Council, Oxfordshire County Council and South Oxfordshire District Council, has started a traffic modeling exercise to examine a possible 'Third' Reading Bridge over the Thames. We understand that this bridge could remove some of the South Oxfordshire 'through' traffic from Reading, Caversham, Sonning and (possibly) Henley Bridges.

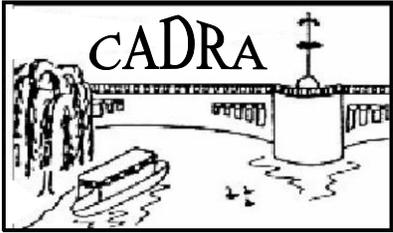
Until the traffic modeling has been completed and the location of the Third Reading Bridge and connecting roads has been determined, we believe that no further residential development should be permitted within the South Oxfordshire study area.

The Traffic Management Act 2004 Part 2 Section 16 - Network Management Duty: requires traffic authorities to consider:

"the expeditious movement of traffic on road networks for which another authority is the traffic authority."

We believe that contributions by developers should be made available to the adjacent traffic authority where the development would have a detrimental impact.

This might be for upgrading highways and junctions, to accommodate generated traffic, or for the provision of additional public transport services. The aim should be for the road network and



**Caversham
And
District
Residents
Association**

public transport services to be returned to the levels of capacity that were available before the development was constructed.

The adjacent traffic authority should be consulted, at an early stage, to enable the traffic impact on that authority's area to be assessed and the level of contribution towards mitigating measures to be agreed before planning permission is granted.

Therefore, we object to the proposed residential development on the grounds that the cumulative effects of South Oxfordshire developments have contributed to a worsening of traffic congestion, pollution, which is already at dangerous levels, and quality of life in Caversham.

2.4.2 Local Traffic

The 2011 Census data shows that the likely workplace destinations of residents of the new development are likely to be (approximately): 42% to Reading, 11% through Reading and 25% towards Sonning Bridge via Caversham Park Village. Therefore 53% of the newly generated traffic would travel through Caversham which is already heavily congested. In these circumstances, it is reasonable to assert that one additional vehicle equates to one additional vehicle on the queue length.

The peak hour Trip Generation figures appear to be over optimistic especially as the new development is proposed at the boundary of a major town and in an area with poor and infrequent public transport provision. It would have been helpful if new data had been collected from similar, nearby, developments with similar resident demographics. Reliance upon generic TRICS data seems naive.

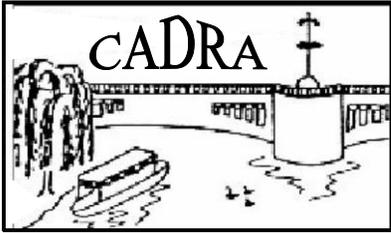
The individual junction analyses show that some junctions are at, or above, their capacities in peak periods and that traffic generated by the new development would increase existing queues and delays. The developers do not propose any mitigating measures to accommodate additional congestion. In effect the developer is proposing to reduce the design life of the junctions provided by the Highway Authority (Reading Borough Council) without compensation.

Existing bus services are full in peak periods and passengers from the new development will deny space to people who live closer to Caversham and the centre of Reading. No contribution has even been considered to provide improved local bus services.

To recap, this proposal is based upon generic trip data and not on reliable, locally sourced trip rates and is, therefore, flawed and does not inspire confidence.

2.5 Education

All references in the planning documents are to primary schools in Caversham and Emmer Green – not to SODC schools. All primary schools in Caversham and Emmer Green are at or above



**Caversham
And
District
Residents
Association**

capacity. It can be expected that 245 homes with 40% affordable will house a considerable number of families with young children.

We strongly object to this proposal without any provision to increase the physical capacity of school places. At the exhibition held, Gladman advised they would be holding discussions with Reading Borough Council Education Department but there is no reference to this in the planning documentation.

2.6 Primary Health

Again, reference is to the GP Surgeries in Caversham and Emmer Green – not to SODC services. Primary health services in North Reading are at capacity. 245 new homes will represent a considerable increase in demand for services.

We strongly object to this proposal without any increase in capacity of local primary health care services.

3 Conclusion

Our objections to this application can be summarized as follows:

- It is contrary to both the approved and emerging planning strategy for South Oxfordshire District Council, which protects the rural area abutting the boundary with Reading Borough.
- It is contrary to the approved and emerging planning strategy for Reading Borough Council, which focuses new housing development south of the River Thames.
- It has substantial implications for infrastructure, transport and essential services within Reading Borough, and especially for the residents of Emmer Green and Caversham, and no consideration of their impact or contribution for their provision has been made

For these reasons we believe that the proposed development is unsustainable and thus contrary to the National Planning Framework.

CADRA therefore strongly OBJECTS to this application and believes it should be REJECTED.

Yours faithfully,

Helen Lambert
CADRA Chair
Caversham And District Residents Association

5 Derby Road, Caversham, Reading RG4 5HE - helenlambert@btinternet.com – 0118 947 3165