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Town Clerk
Earley Town Council
Council Offices
Radstock Lane
Earley, Reading
RG6 5UL
By email: deputy@earley-tc.gov.uk

Date: 21 June 2021
Our ref: 62681/01/DL/SM/19856466v1
Your ref:

Dear Sir/Madam

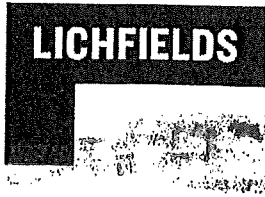
Land off Meldreth Way, Lower Earley: Full Planning Application Ref. 211686

On behalf of our client, Lower Earley Properties Ltd (LEPL), we are writing in relation to the forthcoming Earley Town Council Extraordinary Meeting of the Planning Committee on 22 June regarding the above planning application. We request that this letter is made available to and/or read out to Members.

We are committed to ensuring that the Town Council is able to carefully consider and make a fully informed decision on this application. LEPL are disappointed that the Town Council's Planning Advisor's comments on the application (Appendix B) do not purport to be an assessment of the 'planning balance' underpinning the application and does not recognise any of the benefits of the application proposals. These include the creation of jobs, new market and affordable housing provision, increased customer choice, improved permeability within the local area and the incorporation of a number of sustainability measures.

The proposals support the Borough Council's objectives of creating a sustainable local economy, meeting both housing demand and the recognised need for further convenience retail floorspace in a sustainable location. They also provide other benefits within the local area including the creation of new jobs.

The Planning Advisor's comments do not therefore enable Members of the Earley Town Council Planning Committee to make an informed and balanced decision on the planning application. The application submission fully addresses all relevant planning matters and we do not seek to repeat this here, however, we set out our response to the main comments made by the Town Council's Advisor in Annex 1 of this letter, to assist members in their decision making. This includes highlighting a number of areas where the advice provided is incorrect or inaccurate, specifically where it references a failure to comply with specific policies. Please note that where we have not commented on a specific comment it does not mean that we accept it.



We trust this is of assistance in considering the application. LEPL would like to continue a dialogue with Earley Town Council and are happy to answer any queries Members may have to ensure they can make an informed decision on the application.

Yours faithfully

A handwritten signature in black ink, appearing to read "Sarah Moorhouse".

Sarah Moorhouse
Associate Director

Annex 1: Response to Earley Town Council’s Planning Advisor’s Recommendations

	Earley Town Council Planning Advisor Recommendation	Applicant Response
1	<p>In the absence of a challenge to the Wokingham Borough Council 5-year Housing Land Supply, there is no National Planning Policy Framework (NPPF) Paragraphs 2 and 11 justification for a development outside the development boundary, on land designated as “countryside”, which would be contrary to Policies CP11 and CC02, and neither is it a brownfield site as set out in NPPF Paragraph 117. As a result, the proposals fail to maintain or enhance the high quality of the environment and are of an inappropriate scale of activity, mass, layout, built form and character to the area, to the detriment to the amenities of adjoining land users, including open space. The proposals result in the intrusion of a dense urban character into the countryside, with no graduation in response to the landscape character of the surroundings. The proposals do not enhance the ability of the site to support fauna and flora and do not integrate with the surrounding open space, contrary to Policies CP1 and CP3, and contrary to NPPF Paragraph 170</p>	<p>The planning application submission fully addresses the proposal against both national and local planning policy. This includes the principle of development, the sustainability of the sites location (adjacent to the Major Development Location of Lower Earley) housing need/supply, the acknowledged need for convenience retail floorspace and retail planning policy considerations.</p> <p>The proposed density, layout built form and character is appropriate in the context of the existing local context that has been assessed in detail as part of the application submission.</p> <p>As set out in the accompanying Landscape and Visual Impact Assessment (LVIA) the site has been identified to be of ‘low’ landscape value, is detached from the wider rural countryside character and is a settlement fringe character which is characterised by the immediate adjoining residential development and adjacent transport corridors.</p> <p>The site is physically and visually separated from the wider rural landscape to the south by the main road corridor and established vegetation structure that bounds both sides of the B3270. It is not considered to represent a “valued landscape” in relation to the NPPF. The proposals reflect the scale, mass and layout of the prevailing residential character to the north and west, and have given careful attention to the retention of the majority of the boundary vegetation and also includes extensive new landscape proposals that will create biodiversity enhancements.</p>

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There is a loss of local amenity arising from the loss of the current continuous green wooded corridor along Lower Earley Way. Existing open space and landscaping along most of Lower Earley Way creates a strong visual green corridor that is an essential part of the wider character, landscape setting and amenity of Lower Earley as a whole. This corridor also forms part of the wider open countryside to the south of Lower Earley. The green corridor is essential to the character of Lower Earley as a transition between built up and green areas and provides an environmental buffer to the M4 motorway to the south.

The proposed food store would destroy the green corridor character with a visible commercial use in a prominent location, comprising of a building, with significant hard paved areas to the frontage of this part of Lower Earley Way. The building and parking would be visible to traffic using Lower Earley Way and Meldreth Way, disrupting the continuous visual function and amenity of the existing green corridor. The opening up of views from the nearby roads would be considered essential for attracting customers, as indicated in the Design and Access Statement.

The proposals show a reduction in width of the green corridor, as a result of both the food store and residential development. This reduction in width of the corridor is excessive and would weaken its current character and visual function.

The development fails to enhance the landscape, by not protecting or enhancing the green infrastructure. It fails to promote accessibility, linkages and permeability between and within existing green corridors such as footpaths, by not integrating with adjoining open space and countryside, resulting in the unacceptable fragmentation and isolation of areas of green infrastructure, contrary to Policies CCo3 and TB21. It also fails to

As set out in the planning application submission, the site is private land and is not allocated as open space in the current Development Plan nor is it accessible to the public.

Our analysis demonstrates that there is significant amenity green space within the Lower Earley area and the application proposals will lead to the introduction of new high quality multifunctional open space within the residential development including a Local Area of Play (LAP).

The LVIA and Landscape Strategy Plan that accompany the planning application clearly identify that the proposals can be integrated within the landscape setting without significant harm to the landscape character or visual amenities. The proposals include extensive new landscaping, areas of public open space and pedestrian links as well as the retention of the majority of the existing boundary vegetation structure. This would not result in unacceptable fragmentation or isolation of areas of green infrastructure nor would it adversely impact permeability for wildlife. The proposed landscape scheme also includes new native planting and wildflower grassland within the eastern corner that links with the existing open space to the west and provides localised landscape and biodiversity enhancements.

The landscape proposals have given careful attention to the retention of the majority of the boundary vegetation which also includes extensive new landscape proposals and pedestrian links with the existing open space on Chatteris Way to the west. The existing green corridors along the site boundaries are to be largely retained and enhanced as part of the proposals including that along Lower Earley Way and therefore the green edge to the built up area is to be maintained with limited effect on the wider landscape character to the south.

Any visibility of the proposed foodstore will be limited to the Lower Earley Way and Meldreth Way road corridors and roundabout which includes

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	<p>ensure that the development is ecologically permeable through the protection of existing and the provision of new continuous wildlife corridors, which shall be integrated and linked to the wider green infrastructure network, contrary to Policy TB23c). Also, the development demonstrates a failure to enhance the natural environment and improve access to the countryside contrary to NPPF Paragraphs 8c and 118.</p>	<p>lower sensitivity receptors already within an urban / settlement fringe setting. Views of the proposed built form from the wider landscape setting to the south will not be appreciated.</p> <p>Accessibility and permeability have been key factors in the design of the scheme. The proposed link from the east to the west navigates through three areas of public open space to specifically provide visual connectivity, assist in wayfinding and help to identify the location of the Lidl store to residents as well as the wider community.</p> <p>The application proposals therefore meet the national and local plan policy objectives of enabling connectivity and permeability with nearby space and, as far as possible, maintaining strategic landscaping.</p>
3	<p>The proposals for a footpath connection linking the open space on either side of the site, tracking through a retail car park and alongside a suburban road, presents an urban aspect, failing to enhance the landscape and footpath links in a manner that enhances the connection between green spaces, contrary to Policy CCo3.</p>	<p>As set out above, accessibility and permeability have been key factors in the design of the scheme and maintain the semi-urban character of the local context.</p> <p>The proposed footpath link fully complies with Policy CCo3 promoting the integration of the scheme with adjoining public open space.</p>
4	<p>The retail element of the proposals is not well connected to the existing centres and is well beyond the edge of centre of the nearest retail area, contrary to NPPF Paragraph 87; it seems more targeted at passing trade than to serve the immediate community. In addition, the proposals do not demonstrate compliance with Policy TB16. In addition, the Town Council is concerned that the assumptions derived from pre-pandemic retail spending patterns may no longer apply due to people switching to on-line purchasing, and this does not appear to have been addressed in the Planning and Retail Statement.</p>	<p>The application proposals respond to a recognised need for further convenience retail floorspace to serve the local community and comply with local and national planning policy. There are no suitable, available and/or viable sites in sequentially preferable locations and that the development will not have a significant adverse impact on existing, committed, or planned investment or the vitality and viability of centres.</p>
5	<p>Failure to demonstrate adequate and safe access to the development, in particular the Chatteris Way junction, that has been designed without regard to best practice, which would normally result in such an access being straight for at least 10m</p>	<p>The proposed site access has been designed in accordance with best practice, considering the on-site constraints. It has been demonstrated that large vehicles can enter and exit the site, and although some overrun</p>

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	from the bell-mouth channel, and within 10 degrees either side of perpendicular, to ensure that larger vehicles can enter and leave without conflicting with other traffic, particularly between cars and service vehicles, giving rise to highway safety risks, contrary to Policy CP6.	can occur, such vehicle movements will be infrequent owing to the residential nature and scale of the site. There is adequate forward visibility around bends and 2m footways along both sides of the carriageway which will ensure safe and suitable access for pedestrians.
6	The design of the access into the food store fails to address the potential for fast moving vehicles exiting the Lower Earley Way roundabout, as observed by local residents and evidenced by the historic number of accidents at this roundabout, giving rise to potential road safety concerns, contrary to Policy CP6.	<p>Personal Injury Accident (PIA) data analysis was undertaken as part of the Transport Assessment and this has identified no concerns relating to this location</p> <p>Meldreth Way is subject to 30mph speed limit restrictions that begin just north of the B3270 Lower Earley Way roundabout, however, to ensure a robust assessment, the visibility splay assessment considered a 50mph speed limit on approach from the site access to ensure robustness.</p> <p>The proposed foodstore and access locations are not anticipated to give rise to or worsen any highway safety concerns. Additionally, new infrastructure is being proposed for pedestrians and cyclists to allow sustainable travel modes to and from the site and the local junction modelling undertaken as outlined within the Transport Assessment Addendum does not indicate that the addition of the development will adversely impact the operation of the Lower Earley Way roundabout. The proposals are therefore compliant with Policy CP6.</p>
7	The proposed development fails to address the climate emergency by not incorporating technologies to future proof the occupants of the dwellings, against the emerging national policies for net zero carbon.	<p>The Energy Report which accompanies the application sets out the measures which are proposed to ensure the development delivers a minimum 10% reduction in carbon emissions through renewable energy or low carbon technology.</p> <p>The HQM score for the residential element results in '4 stars' and the BREEAM Pre-Assessment for the foodstore is achieving 'Very Good'.</p> <p>The report demonstrates that the scheme accords with the NPPF and MDDL Policy CCo4: Sustainable Design and Construction and Policy CCo5: Renewable Energy and Decentralised Energy Networks.</p>

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		There is no requirement at national or local policy level for the development to achieve net zero carbon.
8	The Energy Statement fails to make it clear that photo voltaic panels will be installed to all residential properties, to address Policy CC05.	The Energy Report which accompanies the application identifies (Section 3) that photovoltaic panels will be installed on each residential property stating : <i>"Min 1 kWp photovoltaic panel array mounted on the roof slope that is closest to due South for each dwelling"</i> .
9	The Ecological Statement fails to address the issue of badgers, alluded to in an un-redacted element of that report. As such, the Ecological Statement fails to adequately address wildlife and biodiversity issues raised in the report, contrary to Policies CP3c). CO5d), CP7 and TB23	The Ecological Appraisal that accompanies the application considers badgers at Section 5.3. It concludes that the proposals are unlikely to have a significant impact on any local badger populations. Precautionary safeguards in respect of badgers are set out at sections 6.1.8 – 6.1.9 of the Ecological Appraisal such that this species would be fully safeguarded.

