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Comments on Reading Draft Local Plan – June 2017

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Numbers relate to section numbers in the draft plan.
http://www.reading.gov.uk/media/7154/DraftReadingBoroughLocalPlan0517/pdf/Draft_Reading_Borough_Local_Plan_0517.pdf

2. Vision and Objectives:

Good ideals – we particularly welcome the commitment to public transport, walking and cycling - but the vision does not quantify levels of development and we have concerns about how quality of life and sustainability can in practice be balanced with role as a hub for the growth in population envisaged for the Western Berkshire Housing Area.

On a South East England scale the environmental footprint was calculated to be 29 times its land area as derived in the 'Taking Stock' report for the SE Plan - http://library.uniteddiversity.coop/Measuring_Progress_and_Eco_Footprinting/Ecological_Footprinting/Taking_Stock_Managing_Our_Impact-An_Ecological_Footprint_of_the_South_East_Region.pdf - so arguably any increase in population will be less sustainable and will add to costs as more food, energy and materials must be sourced from abroad or at least outside the region.

A larger residential catchment area for the town centre, much of it outside the Borough, will increase demand for transportation. A larger population will increase demand for food, energy, water and recreational space whilst presumably reducing local agricultural land and greenspace.

In particular the practicality of "Generating a large proportion of its own energy from renewables" referenced in the Reading 2050 proposal – if this is taken to mean local generation - has to be questioned even without the projected population growth. Objective 5 – addressing sustainability and climate change – does not repeat this visionary aim for local energy generation.

It's not clear where climate change mitigation and adaptation are addressed in the Objectives. If Objective 5 is intended to relate primarily to transportation (it mentions 'accessible and sustainable') then Objective 3 (which is discussed in 2.2.3) should mention energy efficiency and energy supply and the intention to make progress towards low-carbon living.

3. Spatial Strategy

Reading the whole Plan gives the impression that most of the available space may be used by 2036. The Plan should aim to leave space for future development options after 2036. Demolition and re-development has high environmental impact in terms of resource use and carbon emissions so space should be left to allow for future requirements – which may be related to novel techniques for energy supply or waste management, or to provide services locally that at present are provided elsewhere.

Strategy should aim for declining rate of development rather than a fixed rate up to 2036. Fixed rate implies that either development continues at a similar rate – for which there is no land - or comes to a sudden halt – with bad consequences for businesses and the labour market.

We don't accept that identified 'needs' for housing or employment are accurate or should be met. They were developed without assessment of environmental capacity. The Strategic Housing Market Assessment is based on pre-Brexit trends. Future employment patterns will depend on emerging trends in automation, working from home, and UK competitiveness following Brexit.

Development at Grazeley is a long way from central Reading so should be discounted on transportation grounds – it seems unlikely that a development of 15,000 homes so close to Reading and the M4 would be self-contained in terms of employment or retail - also because it would largely be a green field site and is very close to AWE. With a station at Green Park it could be more difficult

to maintain adequate passenger capacity and long-distance rail freight services on the Basingstoke line if an additional station is added at Grazeley.

The proposed area between Pingewood and Burghfield is similarly unsuitable. It is largely green field or reclaimed gravel pits and is close to AWE and the M4 and far from central Reading. As 3.1.6 says there are also flood risk constraints.

3.2.3 Central Reading:

It is accessible by rail but that only works if both origins and destinations of journeys are accessible by rail. To take more activity must reduce road traffic in the town meaning a greater reliance on public transport for peak-time travel.

How sustainable are tall buildings?

- Do they shade other buildings reducing potential for solar energy capture?
- How high is the embodied carbon and energy in use?
- How much of their demand can be met from ground-sourced heat?
- If residential, is it acceptable to have little per-capita local greenspace?

3.2.5 South Reading:

A33 is the major road transport link to central Reading from M4. It will be heavily used by freight as well as commuters and business travel. It can already be quite congested – general traffic levels should be reduced to allow for freight and public transport use.

4.1 Cross-Cutting Policies:

CC1 – Presumption in Favour of Sustainable Development:

- We appreciate that such a policy is required to demonstrate compliance with the NPPF
- This policy gives no weight to global impacts – in particular climate change – but only refers to local impacts. It is not enough to "*secure development that improves the economic, social and environmental conditions in the area*" – there should be a commitment to contribute to long-term improvement in global environmental conditions – to 'living within the planet's environmental limits' as acknowledged in the quotation from 'Securing the Future' in the NPPF – and to the 'environmental role' described in paragraph 7 of the NPPF.
- We understand that according to Section 19 of the Planning and Compulsory Purchase Act 2004, as amended in 2008, there is a duty that development plan documents must contribute to climate change mitigation and adaptation.

CC2 - Sustainable Design and Construction:

- **Buildings should be designed with energy use reduction as a key objective.**
- This policy should be expanded to address all development, If not then the heading should change to clarify that this applies only to non-residential development.
- BREAM 'Excellent' or better should be the standard everywhere for non-residential development.
- Lifetime carbon emissions – including both embodied and use-phase carbon - should be assessed using the emerging RICS Whole-Life Carbon Professional Statement method to ensure that the best design choices are being made to minimise climate impacts.
- 4.1.2 refers to the Climate Change Strategy – but this only has a target to 2020 when the Plan extends to 2036. Longer-term goals should be cited.
- There is an emerging need to improve choice of materials to improve internal air quality. (see 'Better homes, better air, better health'. Ref: ARCC, 2017. (Ed. Turner, B.D.) Better homes, better air, better health: Event report. UKCIP, University of Oxford).
- Recycled materials should be made use of where practicable.

CC3 – Adaptation to Climate Change:

- Special mention should be made of the need design-in low-carbon techniques to address risks of over-heating. The ability to open windows is important, as well as mechanical ventilation and heat recovery/cooling techniques. Thermal mass can help keep buildings cool in summer and warm in winter.
- Grassed and planted areas can be very useful in reducing water runoff.
- Green roofs and walls may be useful but their lifetime costs and benefits should be assessed with care to avoid 'greenwash'.

CC4 – Decentralised Energy:

- Decentralised energy as covered in this policy – essentially CHP and District Heating - should be encouraged. Note there can be significant issues around sustainability of biomass, especially if not locally sourced, and gas-fired DH/CHP may well not be seen as sufficiently low-carbon in the longer term unless some form of 'green gas' becomes available or carbon capture is implemented. There are also very significant concerns about the impact on air quality from biomass combustion.
- Policy should be broadened to cover on-site renewable energy techniques such as solar PV, solar thermal, ground-sourced heat and air-sourced heat if these are not addressed elsewhere.
- Developers should be required to demonstrate that they are taking all possible steps to reduce energy use and once carried out then to increase on-site energy capture, and to reduce emissions and future energy costs.

CC5 – Waste Minimisation and Storage:

- On-site segregation of materials – especially building materials and soils - should be encouraged. Cross-contamination degrades value and increases waste.

CC6 – Accessibility and Intensity of Development:

- Much improved cycling and bus provision is required. If their projects add to aggregate demand developers should be required to contribute to this across the network, not merely close to their sites.
- Developers should be required to install cycle-parking provision and showers on-site at workplaces.
- 4.1.27 refers to a proposed standard for bus services within 400m of locations. 400m is a long way for many elderly people to walk. Bus shelters with seating should be provided – especially important for elderly people and where the service is likely to be infrequent.
- Bus-priority measures are needed so that buses run frequently and on time – offering attractive alternatives to the private car.

CC9 – Securing Infrastructure:

- Employment development must contribute to necessary infrastructure – see comment on CC6.

4.2 Built and Natural Environment

EN3 – Conservation Areas:

- There is potential conflict between the aims of this policy and the vital need for 'deep retrofit' of older properties to make them more energy-efficient – saving carbon emissions and reducing heating costs. 'Whole-street' retrofits – perhaps with financial support from the Council or heritage funding – may be a way forward.
- A particular issue is the need to provide on-street parking with charging points for electric vehicles.
- Another issue is the potential need to provide local waste collection and processing points.

EN5 – Views:

- Visual amenity is important – other aspects to consider include the view SW from The Cowsey, and the view downstream from Kennet Mouth.

EN7 to EN11 – Local Green Space and Public Open Spaces:

- We support these policies in general. When open space may be lost or damaged it is important to aim for like-for-like replacement.

EN12 – Biodiversity and the Green Network:

- We support this policy.
- Should specifically reference the 'green network'/'wildlife corridor' potential of the riverbanks, railways, and major road verges.

EN15 – Air Quality:

- Note this appears to relate to outdoor air quality. This or a separate Policy should address choices of building materials and ventilation design to address indoor air quality.
- Note this appears to relate to routine exposures - it does not distinguish between short-term exposures (e.g. during construction works) and long-term exposure (i.e. during normal on-going usage). Special measures should be called for during exceptional periods.
- Need to be aware that the present standards do not represent 'safe' levels of pollutants and standards are likely to be tightened over the course of the Plan which should call for a precautionary approach.
- In particular the effect of micro-particles – PM2.5 – should be considered.
- Not clear how a detrimental effect can be 'mitigated'
- The Policy says development should not be permitted if it 'would significantly worsen air quality'. This is too lenient and open to debate. Policy should aim for 'Clean Air Everywhere'.
- 'local worsening in air quality' should only be allowed if the predicted levels are substantially below national and WHO target levels.

EN17 - Flooding and Sustainable Drainage:

- Front gardens and car parking areas should be made permeable.

4.3 Employment:

EM1 – Provision of Employment Development:

- The wide range of numbers quoted in the text and in the Policy demonstrates that this is far from an exact science.
- While Reading should remain a 'local hub' it should not seek to be the employment provider for the Western Berkshire Housing Area – to reduce the numbers of people travelling to Reading from 'dormitories' other larger towns and settlements should be given the opportunity to provide local employment. A 'Berkshire Structure Plan' should address this issue.
- See comments above on Vision and Spatial Strategy. Brexit, automation and working from home are among the trends which have caused the massive drop in demand for floorspace seen over recent years and these may well continue.
- Projected population growth in central Berkshire will make us less environmentally and economically sustainable so lower figures should be adopted for housing and employment.

EM2 and EM3 – Location of New Employment Development/Loss of Employment Land:

- Conversion of car parking space, and dedicated car parks, to employment development should be encouraged.

EM4 – Maintaining a Variety of Premises:

- Flexibility is key to avoid need for redevelopment.
- Support mention of start-up space.

4.4 Housing

H1 – Provision of Housing:

- Don't accept that identified 'needs' for housing or employment are accurate or should be met. They are developed without assessment of environmental capacity. The Strategic Housing Market Assessment is based on pre-Brexit trends.
- Projected population growth in central Berkshire will make it less environmentally and economically sustainable and less attractive so much lower figures should be adopted for housing so that this remains an attractive and prosperous area.
- Housing should cater for a flat age distribution of population so that retired people are not under pressure to move away – this will benefit community and family relationships.
- Rate of development should be phased down over the plan period – particularly after 2026 when many existing permissions will have been fulfilled.

H4 – Standards for New Housing

- What is required is very high levels of insulation and air tightness coupled with ventilation with heat recovery and appropriate low-carbon heating either by district heating or heat-pumps. Solar PV and electricity storage should be incorporated where possible.
- c) Emission rate - proposed 19% improvement in on 2013 Building Regulations is not enough. New build should be to a robust low energy standard for example PassiveHaus standard.
- d) 'Zero Carbon Homes' requires definition – it does not necessarily mean what would be inferred from the words - proposed standard was watered down and then dropped by the government. What it probably means is that new housing may contribute to off-site low-carbon energy generation to reduce its carbon footprint.
- Lifetime carbon emissions – including both embodied and use-phase carbon - should be assessed using the emerging RICS Whole-Life Carbon Professional Statement method to ensure that the best design choices are being made to minimise climate impacts.
- All new housing should be developed with the needs of less-able elderly people in mind – wheelchair access, lifts, toilet facilities etc. people shouldn't have to move when they become old or ill.

H5 – Accommodation for Vulnerable People:

- iii) 400m seems too far for older people and people with physical disabilities.

H7 – Residential Conversions:

- Should aim to achieve similar standards of energy efficiency and carbon emissions as new build.

H8 – House Extensions:

- Should aim to achieve similar standards of energy efficiency and carbon emissions as new build.

4.5 Transport

TR1 – Achieving the Transport Strategy:

- Larger developments should be permeable for pedestrians and cyclists but not for general vehicles.
- Public transport priority should be designed-in to bring down walking distances and to provide suitable waiting facilities.

- Residential areas should promote park-and-ride and bike-and-ride by provision of appropriate car and cycle parking for key bus-routes.

TR2 – Major Transport Projects:

- It is right to safeguard land for these projects.
- We are concerned that the proposed Reading East MRT route (and associated P&R in Wokingham) will be very damaging to visual amenity and wildlife and heritage interests. Land should be safeguarded to improve capacity on the A4 between Cemetery Junction and Suttons Seeds.
- We are concerned that the proposed 'additional Thames crossing' will be very damaging to visual amenity and wildlife and heritage interests. Without a Caversham Outer Distributor Road to the Woodcote Road it will be costly and ineffective and will encourage the use of vehicles; with a Caversham Outer Distributor Road to the Woodcote Road it will be extremely costly and extremely encouraging to the use of vehicles. Even more land should be safeguarded to increase capacity of bus services.

TR4 – Cycle Routes and Facilities:

- Strongly support improvement of cycle facilities.
- Roads must be made wider so that vehicles can overtake cyclists when traffic is flowing and cyclists can undertake vehicles when traffic is halted at junctions.
- Provision should be made for more cycle parking both within developments and on-street.
- MRT and P&R vehicles should have provision to carry bikes.
- Provision should be made for cycle hire at part of the Reading Station complex.

TR5 – Car and Cycle Parking:

- Support provision of cycle parking within developments.
- Vehicle parking should be extremely limited in town centre locations.
- Where on-street parking is permitted in residential areas residents should have defined spaces and be permitted to install electric vehicle charging points.

4.6 Retail, Leisure and Culture

RL1 – Network and Hierarchy of Centres

- Strongly support maintenance and enhancement of centres outside central Reading to reduce demand for transportation and to enhance community cohesion.

Ends.
