

Reading Friends of the Earth – www.readingfoe.org.uk – info@readingfoe.org.uk

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Reading Friends of the Earth

Comments on Reading Pre-Submission Draft Local Plan – January 2018

Version: final – 26th January 2018

Reading Friends of the Earth would like the opportunity to appear at the Public Examination if matters on which we have made representation are chosen for detailed examination.

Reading Friends of the Earth would like to be kept informed of the progress of the plan.

PART A – YOUR DETAILS

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Notes from RBC on representations at this stage of the process:

We do ask that your representations set out the following information for each part of the plan that you wish to comment on:

- The part of the document to which your response relates (paragraph, policy or section);
 - Whether you consider that the plan, or part of the plan, is legally compliant, sound and complies with the duty to co-operate, and why;
 - What modification you think is necessary to make the plan, or part of the plan, legally compliant and/or sound.
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Policy CC2: SUSTAINABLE DESIGN AND CONSTRUCTION

Soundness: This is not sound because it does not require new non-residential buildings to reduce their energy consumption and CO2 emissions to a sufficiently '*radical*' extent and it fails to account of 'embodied carbon'.

- Section 10 of the NPPF says planning should "*secure radical reductions in greenhouse gas emissions*".
- Objective 5 of the Plan is "*Ensure new development and existing areas are accessible and sustainable, in accordance with the sustainability appraisal objectives, including reducing its effects on, and adapting to, climate change*"

BREEAM standards do not adequately address carbon emissions.

BREEAM 'Very Good' and 'Excellent' standards require respectively no credits and 6 credits for CO2 reduction as a minimum standard.

These credits are then expressed as % of 30 credits which is the maximum number of credits for CO2 reduction. So buildings meeting BREEAM 'VG' and 'Excellent' standards could score respectively 0% and 20% for CO2 reduction.

These percentages are then weighted by the 19% which is the weighting for CO2 reduction under BREEAM assessment. So BREEAM 'VG' and 'Excellent' standards could be achieved with CO2 reduction contributing respectively 0% and 3.8% to the total BREEAM score.

BREEAM 'VG' and 'Excellent' standards require total scores respectively of 50% and 70%.

Retro-fitting energy saving technology in the future is likely to be much less cost-effective than achieving a high standard for the initial build.

Modification: The developments covered by this policy should be required to achieve high levels of energy efficiency and carbon reduction.

In addition to their proposed BREEAM standard this policy should require:

- Fabric energy efficiency to meet a high standard— perhaps under the BREEAM scoring system so that no additional assessment will be required.

- Future-proofing of the heat supply system to allow for low-temperature heat supply from district heating or heat pumps (i.e. suitably sized underfloor or ‘blown air’ heat exchangers) even if initially gas or direct electric heating is to be used.
- Lifetime carbon emissions – including both embodied and use-phase carbon - should be assessed using the RICS Whole-Life Carbon Professional Statement method to ensure that the best design choices are being made to minimise climate impacts.
- Post-occupancy Evaluation to confirm that performance is being achieved and to provide evidence that the ‘performance in use gap’ has been closed.

References:

http://www.breeam.com/BREEAM2011SchemeDocument/content/06_energy/ene01_general.htm

http://www.breeam.com/BREEAM2011SchemeDocument/content/06_energy/ene01_general.htm

Paragraphs 4.1.2 and 4.4.43

Soundness: This is a Plan to 2036 so there should be commitment to carbon reduction beyond the 2020 horizon of Reading’s Climate Change Strategy.

Modification: Reference should be made to:

- The Climate Change Act ... and ...
 - The Climate Change Committee’s Carbon Budgets – e.g. 5th Budget 57% reduction by 2030 ... and ...
 - There should be commitment that Reading’s emissions reduction targets will exceed future Carbon Budgets and Building Regulations.
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Policy CC4: DECENTRALISED ENERGY

Soundness: This is not sound because it takes a short-term view of carbon emissions reduction based on current viability and technology and only requires developers to consider rather than implement decentralised energy provision if this is ‘suitable, feasible and viable’.

Gas-fired CHP may be currently suitable and viable compared with grid electricity and gas-fired heating but it is becoming less so as grid electricity is decarbonised, and as ever-tighter emissions targets must be achieved. It must be used as a temporary measure if at all. Future ‘energy vectors’ to distribute energy to urban developments are likely to be electricity or hydrogen so as to eliminate local carbon emissions.

The policy does not require new developments to be prepared to use low-grade heat in the future, if at present only conventional heat sources are judged viable.

Modification: Replace Paragraph 2 with “Any development of more than 20 dwellings and/ or non-residential development of over 1,000 sq m shall include all forms of decentralised energy provision, within the site, that are suitable, feasible and viable. If a low carbon heating system using decentralised energy is not currently viable developments shall future-proof their heating system to allow for low-temperature heat supply from district heating or

heat pumps (i.e. by installation of suitably sized underfloor or blown air heat exchangers) even if initially gas or direct electric heating is to be used.”

Paragraph 4.2.77: PM2.5

Soundness: This is not sound because, while it references a national goal to reduce PM2.5 exposure by a percentage, and points out that there is no safe level, it does not reference guidelines for absolute levels of exposure.

Modification: Include reference to WHO guide level for annual exposure to PM2.5

Paragraph 4.2.81: Air Quality Assessment

Soundness: This is not sound because in the context of both air quality and congestion 100 extra car parking spaces per development may well prove excessive ... especially if many of them were to be used by peak hour traffic ... because congestion has a non-linear response to traffic density, and air quality probably has a non-linear response to congestion and traffic density. Note that the proposed East Reading Park and Ride has only 277 spaces.

All development within the AQMA should be subject to an Air Quality Assessment if parking for motor vehicles is to be provided.

Modification: Modify second bullet point to read as follows: “Would include parking for motor vehicles.”

Policy H1: PROVISION OF HOUSING

Soundness: This is not sound because projected population growth in Reading and central Berkshire will make it less environmentally and economically sustainable and less attractive, so much lower figures – on a declining trend - should be adopted for housing so that this remains an attractive and prosperous area. See NPPF Paragraph 14 ‘plan-making’.

It is important that some available land remains at 2036 but the draft Plan would leave none.

Modification: Replace “Provision will be made for at least an additional 15,433 homes (averaging 671 homes per annum) in Reading Borough for the period 2013 to 2036.” with “Provision will be made for 671 homes per annum in Reading Borough for the period 2013 to 2023 after which the rate of new housebuilding will decline linearly to zero by 2036 unless this plan is revised”

Policy H5: STANDARDS FOR NEW HOUSING

Soundness: This policy is unsound because:

- It does not require new developments to be prepared to use low-grade heat in the future, if at present only conventional heat sources are judged viable.
- The reduction targets below building regulations are not sufficiently deep because it becomes increasingly difficult to save energy by post-build improvements. For long-term economic and environmental sustainability bigger savings must be designed-in as it will not be possible to make the necessary savings later on. Designed energy reduction measures must deliver those savings and not leave the well-known “performance gap” that regularly occurs with most standards including building regulations.
- It does not require developers to take account of lifetime carbon emissions including ‘embodied carbon’.
- It does not state that Reading Borough Council will commission buildings to higher standards than allowed by government regulations, delivering the best housing for Council tenants and trailblazing for future standards in accordance with Reading’s ambitions to be a ‘Green Tech’ exemplar City.
- It does not address issues around water resources and waste management for new housing

Modification:

Add:

- Developments shall future-proof their heating system to allow for low-temperature heat supply from district heating or heat pumps (i.e. by installation of suitably sized underfloor or ‘blown air’ heat exchangers) even if initially gas or direct electric heating is to be used.
- In order to achieve the targeted savings developers shall use a robust low energy standard like Passive House. It is important that the standard works in practice and that the gap between design and as built energy savings is eliminated - this is automatic with Passive House. Whatever standard is used developers must validate and verify results against the set targets.
- Lifetime carbon emissions – including both embodied and use-phase carbon - shall be assessed using the RICS Whole-Life Carbon Professional Statement method to ensure that the best design choices are being made to minimise climate impacts.
- Housing commissioned by Reading Borough Council will conform to Passive House standard or above to provide the best housing for Council tenants, and will be used to demonstrate that this is feasible and affordable.
- Developers shall perform Post-occupancy Evaluation to confirm that performance is being achieved and to provide evidence that the ‘performance in use gap’ has been closed.
- Housing development should include recycling greywater and rainwater harvesting where systems are energy and cost effective. *(Text from CC2)*
- Bin and cycle storage is of an appropriate size and standard for the units proposed and should be located at ground floor level with easy access *(Text from H8)*
- Food Waste recovery and recycling shall be addressed by provision of Macerators.

Ref: https://www.designingbuildings.co.uk/wiki/Performance_gap_between_building_design_and_operation

Ref: Passive House achieved by local Council without cost penalty ...

<https://passivehouseplus.ie/news/design-approaches/passive-house-is-affordable-for-large-scale-housing-en Craft>

Policy TR1: ACHIEVING THE TRANSPORT STRATEGY

Soundness:

Not sound because the current Transport Strategy does not include demand management measures so is unlikely to achieve Reading LTP's Objectives as set out in 4.5.1 of this document, in particular:

- To improve journey times, journey time reliability and the availability of information; and
- To reduce carbon emissions from transport, improve air quality and create a transport network which supports a mobile, affordable low-carbon future.

In view of the forecast growth of Reading (referenced in 4.5.2) measures such as Road Pricing, Clean Air Zones, and Workplace Parking Levies should be included in the Transport Plan.

While measures to support modal shift away from the private car are to be supported the current proposals are unlikely to lead to a substantial fall in congestion. For example recent analysis (Demand Modelling Report – see Ref.) for the East Reading Mass Rapid Transit concludes: “5.3 the scheme would shift some car trips to public transport, the reduction in car trips on the network would not be so large as to release substantial road capacity in the corridor.”

Modification to 4.5.2: Replace “The predicted growth in trips can only be accommodated through major investment in transport, particularly sustainable modes.” With “The predicted growth in trips can only be accommodated through major investment in transport, particularly sustainable modes, and substantial modal shift achieved through demand management measures such as Road Pricing, Clean Air Zones, and Workplace Parking Levies.”

Ref: http://www.reading.gov.uk/media/7933/East-Reading-MRT---Demand-Modelling-Report/pdf/East_Reading_MRT_-_Demand_Modelling_Report.pdf

Policy TR2: MAJOR TRANSPORT PROJECTS

Soundness:

Not sound because alternatives to the East Reading Mass Rapid Transit should be safeguarded because the ‘preferred route’ is extremely controversial and has been objected to by the Environment Agency and many others.

Safeguarding of land for East Reading MRT as depicted in Figure 4.8 is not sound as it contravenes Reading LTP's Objectives as set out in 4.5.1 of this document:

"To deliver balanced packages of value for money transport solutions and make best use of existing transport investment."

- Readings sophisticated traffic management system could be utilised to actively manage traffic via selective road user charging at minimal cost and for widespread benefit compared to East Reading MRT which carries high cost and negligible benefit.

"To align transport and land use planning to enable sustainable travel choices, improve mobility, reduce the need to travel and preserve the natural environment"

- East Reading MRT would create gratuitous destruction of the natural environment for negligible benefit to the local population.

Modification to TR2: Land should also be safeguarded to improve capacity on the A4 between Cemetery Junction and Suttons Seeds.

Modification to 4.5.8: Replace first bullet with ""Mass Rapid Transit: This is a scheme to provide high quality public transport connections between park and ride sites and major travel generators. To the maximum extent possible this will make use of existing transport infrastructure to avoid loss of natural environment. The project involves a number of corridors across the Borough (see figure 4.8), but the route to the south is at an advanced stage, and can be safeguarded on the Proposals Map. Much of the land shown on the route to the South has been secured by Section 106 agreement on major development schemes, and this will continue to be sought on key sites where they come forward."

Modification to figure 4.8: The map in Figure 4.8 must be modified to remove East Reading MRT.

Policy TR5: CAR AND CYCLE PARKING AND ELECTRIC VEHICLE CHARGING

Soundness: This does not go far enough to encourage and facilitate electric vehicle use. New communal parking space provision should be future-proofed by provision of sufficient charging capacity to cope with much higher up-take than 10%. Provision should be made for residents with on-street parking.

Modification:

Change second bullet point to: "Within communal car parks for residential or non-residential developments of at least 10 spaces, 25% of spaces should provide an active charging point and cabling should have capacity to supply charge to 100% of vehicles."
Add new third bullet point: "Where on-street parking is to be permitted in residential areas residents should have defined spaces and cabling and layout should provide for easy installation of electric vehicle charging points."
