

GREN Guidance to Reading's Issues and Options Consultation – March 2016

This note is to provide guidance to GREN members to help them to respond to the Reading Borough Council consultation on Issues and Options for its new Local Plan – responses required by 7th March. See <http://www.reading.gov.uk/newlocalplan> .

RBC want comments on policies and on sites around the Borough – both on sites that may be suitable for development for housing or business and those to be managed for wildlife. These comments and suggestions will inform preparation of a draft plan which will go to further consultation before a formal Examination by Planning Inspectorate, probably in 2017 or 2018.

The ideas and opinions expressed here should not be taken as indicative of GREN's position on these issues - the GREN Members' Meeting on 24th February 2016 agreed that GREN would not respond to the consultation as an organisation but would encourage its members to respond individually.

Structure of this note:

The consultation is structured as 37 Questions (no, you don't have to answer all of them!). You can just send an e-mail to RBC but it may be easiest to respond using the downloadable response form and this will help to track the question numbers. This note refers to the question numbers but groups them slightly differently to the response form.

This note has the following structure:

- Finding the Documents
- Background information - strategic planning and growth
- Objectives for Reading (Questions 1 and 2)
- Policies (Questions 3, 4, 10, 11, 12, 13, 23, 25 to 37)
- Sites (Questions 14 to 22 and 24)

If you only do two things ...

- Address Question 1 on the Objectives (in the Objectives section of this note)
- Address Question 24 to identify your favourite areas of Local Green Space (In the Sites section of this note)

Finding the Documents:

Main Document (Issues and Options Consultation) is at http://www.reading.gov.uk/media/4528/Issues-and-Options-paper/pdf/Local_Plan_Issues_Options_January_2016.pdf

Sustainability Appraisal (in which officers score proposals against 10 Environmental Objectives and 10 Social and Economic Objectives) is at http://www.reading.gov.uk/media/4529/Sustainability-Appraisal/pdf/Sustainability_Appraisal_of_Local_Plan_Issues_and_Options_0116.pdf

The 20 Objectives are described on pages 6 and 7. There are good notes on implications after each assessment of an option.

Response Form is at http://www.reading.gov.uk/media/4530/Response-form/pdf/Local_Plan_Issues_and_Options_response_form_0116.pdf

Strategic Housing Market Assessment is at http://www.reading.gov.uk/media/2959/Housing-Market-Assessment/pdf/Berkshire_SHMA_Full_Report_May_07.pdf

Thames Valley Berkshire **Strategic Economic Plan** is at http://thamesvalleyberkshire.co.uk/Strategic_Economic_Plan

Background Information – Strategic Planning and Growth:

Section 3.2 of the main document explains that Regional Spatial Planning is no longer done. Economic growth has become the main driver of the development planning process. Targets for quantities of housing and business development required are now set by a mechanism of ‘Objective Assessment’ which is largely trend-based and takes little or no account of environmental capacity. Because Berkshire has been a focus for growth for several decades trends are upwards.

An assessment of environmental footprint of the South East region (excluding London) was done in early 2000s. Environmental footprint of SE England (excluding London) was 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 .

A 29-fold improvement in efficiency of resource usage seems quite unlikely to be achieved. Depending on other people’s resources and output may become economically disadvantageous, especially if less-developed regions and nations develop to become less dependent on SE England’s exports.

This, and other evidence on congestion, loss of green space, inability to feed our population etc. suggests that in the interests of reducing future risk and cost, and improving long-term economic and environmental sustainability and quality of life, the SE should be planning for negative (or at least reduced) population growth in the long term. The SE is London’s hinterland.

This need not necessarily imply that Reading should not grow in the long term if it is a more sustainable location than other options in the region.

In the short term there are of course real issues of a growing and ageing population settled in local communities.

Objectives for Reading:

Page 5 of the main document lists the Core Objectives

Question 1 asks if they should be changed.

- First Objective is “Strengthen the role of Reading, including central Reading, as the hub for the Thames Valley ...”;

The Sustainability Appraisal (page 11) shows that many of the environmental aspects associated with this Objective have negative scores. Could argue Reading is strong enough already and improving facilities elsewhere might reduce need to travel.

- Second Objective says *new* development should be accessible and sustainable;
- Fourth Objective calls for “improved accessibility within Reading and for the wider area by sustainable modes of transport”;

Question is whether these two are enough or whether a key Objective should relate to the sustainability or carbon footprint of the entire settlement.

South East Plan had cross-cutting policies CC1 to CC3 on Sustainable Development, Climate Change, and Resource Use (achieving sustainable levels of resource use; reducing greenhouse gas emissions; adapting to climate change; stabilising the ecological footprint).

Reading Climate Change Partnership has a Vision that ‘Low carbon living will be the norm in 2050’ and a target “we will work to reduce the carbon footprint of the borough in 2020 by 34% compared with levels in 2005.”

Question 2 asks if RBC should plan up to 2036.

Reading should be thinking very long-term about sustainable development – well beyond 2036. Reading is required to keep a 5-year supply of identified housing sites, and usually reviews its plans every ten years, and is required to plan for 15 years’ housing supply.

If sustainability may be going to require lower growth in the future then planning for a constant growth rate for 20 years is not sensible ... development needs to taper off at some point.

Policies:

Question 3 is about annual housing provision.

The Sustainability Appraisal (page 14) shows that many of the objectives get negative scores, even with the lowest level of housing provision, and scores get worse with the higher levels of provision.

Note discussion after relevant table in Sustainability Appraisal. If 630 per annum for 20 years uses all suitable land then what happens in 21st year?

Could suggest tapering off provision over life of Plan. Aim for zero by 15 years in? We are talking about re-balancing the economy to the Northern Powerhouse aren’t we?

Conversely there is an argument that it may be better to take more housing in Reading - in high-rise, high-density - rather than develop green fields in neighbouring areas.

Presumably numbers will depend to some extent on whether UK stays in EU and whether Heathrow Third Runway is built.

Question 4 is about affordable housing provision.

More could be provided if more money was available, but amount will be limited if market-housing has to provide the funds. Perhaps a place to raise question of what sort of dwellings should be provided?

Question 10 is about how much employment provision there should be.

Again the Sustainability Appraisal (page 16) shows that many of the objectives get negative scores, and scores get worse with the higher levels of provision.

Suggested options are that it should relate to housing provision but it's not clear what they really mean - more relevant is demand for local employment - which should take into account projections of age structure of population and likelihood that they will require workplaces. Projections are emerging that automation may drastically reduce the number of workers, or their hours

<http://www.theguardian.com/business/2015/nov/12/robots-threaten-low-paid-jobs-says-bank-of-england-chief-economist>

Presumably want enough employment for local working population to minimise commuting ... so a number of issues about how much out-commuting (to London or Heathrow) to expect in the future ... will depend on levels of congestion and fuel prices and availability of work ... but not so much employment that people will commute in from great distances.

Question 11 is about provision for retail

Doesn't seem to be much need

Question 12 is about provision of other town centre facilities

Arts, sports and open space would seem to be obvious candidates.

Renewable energy and low-carbon heating systems ... public transport infrastructure ...

Question 13 is about provision of other facilities

Wildlife corridors, Arts, sports and open space would seem to be obvious candidates.

Renewable energy and low-carbon heating systems ... public transport infrastructure ... waste management infrastructure ... incinerators linked to district heating

Question 23 asks if you are happy with policies to be carried forward in Appendix 1.

These are in Section C of Appendix 1. Suggest don't answer – unless you have a very detailed knowledge of policies.

Questions 25 to 36 are about detailed planning policies.

Suggest don't answer – unless you have very detailed knowledge of policies or opinions on non-environmental matters

Question 37 asks if there are other areas you wish to comment on.

- protection and enhancement of wildlife corridors through the town when granting permission for new development
- more urban trees/greenery to be provided.
- inclusion of homes for wildlife in new developments: swift towers and boxes, nest boxes, etc
- need for sustainable urban drainage schemes (SUDS) for all new housing development areas
- increasing provision of soakaways for new housing to take account of higher intensity rainfall, probably additional downpipes and soakaways but at minimum larger diameter downpipes and higher capacity soakaways
- provision of permeable hard standing/garage for 2 vehicles for each dwelling with more than one bedroom, particularly on bus routes (to prevent road blocking), except in high density town centre locations.
- 'living over the shop' - construction of new dwellings on top of commercial/retail development

- no development on flood plain unless equivalent storage space for flood water is provided within that development area

Sites:

Question 14 is about the spatial strategy ... hard to judge what to say

Question 15 is about choosing sites – an opportunity to call for preservation of greenfield sites but hard to prioritise some of the other options!

Questions 16 to 22 are about choosing sites – require a detailed understanding of sites

Question 24 is about nominating sites to be identified as Local Green Space.

Maps of suggested sites are in Appendix 5 of the Main Document.

Read sections 5.3 to 5.8 of the main document and nominate any sites that you have particular knowledge of that meet the criteria.

END – Version 1 – 1st March 2016

If you would like this guidance to be improved in some way please send your suggestions to
“secretary at gren.org.uk”