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## **EARLEY TOWN COUNCIL**

### **Wokingham Borough Council Local Plan Update Consultation**

#### **Introduction – certain key elements supported**

Earley Town Council supports key points of the draft Local Plan which set out to protect the Green Belt, the countryside and the environment, focusing on important issues - including the Borough's declaration of Climate Emergency and keeping local values at the forefront.

#### **Comments**

Earley Town Council would ask that Wokingham Borough Council consider the comments in this document regarding certain policies proposed in the Draft Local Plan Consultation document.

#### **Policy SS3 – Grazeley Garden Town**

With the proposed erection of 15,000 houses and the potential number of car owners, there will be an impact on Earley in relation to commuting traffic, as it cannot be assumed that all traffic will be travelling to Reading or the M4. There is a likelihood that a significant volume of additional traffic will travel through Earley to access other local areas, or to access nearby railway stations, such as Earley and Winnersh Triangle, which will also impact on the car parking facilities at each station. The increased traffic will add pressure to already busy roads such as Lower Earley Way and there will be additional pressure added to Junction 11, which already see queues of 30mins to 1hr at peak times. The suggested upfront payment from Government to be paid before the erection of housing for infrastructure, seems to be insufficient compared to the infrastructure that will need to be in place – in particular, to cope with the additional traffic. There is further concern that if the upfront payment were not to be received, from where would Wokingham Borough Council find the money to facilitate the required infrastructure?

There is also the added concern that the increased amount of traffic across all areas will create significantly more pollution, which will simply add to the challenge of fulfilling Wokingham Borough Council's pledge to tackle the Climate Emergency.

The Town Council has concerns about the density range of housing which does not seem compatible with the aim of a Garden Town, where you would expect to see a mixture of dwelling sizes. Also, the investment in green issues and the environment is very important and a vital component given the Climate Emergency. Earley Town Council supports the implementation of Policies DH7, DH8 and DH9 for this development.

The Town Council notes (in the Sustainability Appraisal) the concerns about the potential to deliver a successful new town whilst avoiding flood risk from all sources, and in light of recent nationwide flooding issues considers that this casts doubt upon the wisdom of proposing considerable development of an area that has a risk of flooding.

With the potential number of people living at the proposed Grazeley Garden Town, have Wokingham Borough Council considered the impact this will have on the already stretched Royal Berkshire Hospital, as there is no mention of these facilities? Also, would the proposed medical centre be able to cope with the number of residents, in relation to patient to GP ratio figures?

Although of no direct impact on Earley, there is further concern that due to the long lead-in time to bring the Grazeley Garden Town to commencement on site and the lengthy time-frame for carrying out the development, with the uncertainties that this may create, developers of other potential development sites across the Borough will, in the meantime, pursue planning applications and appeals and if successful, thereby increasing the development figure in the Borough over and above the number set out in the Local Plan. To counter this, Earley Town Council considers that the Borough Council should adopt a further key element of its spatial strategy - a realistic strategic development 'Plan B', that it could fall back upon if Plan A (the development of the Grazeley Garden Town), does not progress as presently envisaged. This would strengthen its hand in fighting such appeals.

The Town Council also expresses concern about the proposed railway. This seems unrealistic due to insufficient capacity on the railway line between Basingstoke and Reading, which is already a busy line being the main rail route for freight from Southampton docks to the Midlands and the North.

Even though Policy SS3 states that the proposed Grazeley Garden Town is not located within the Detailed Emergency Planning Zone around the AWE Burghfield site, would the roads be of a suitable size/layout that would be able to cope with a mass evacuation of Grazeley? Also has Wokingham Borough Council considered any disruption during the building work of the Garden Town to any movement of nuclear material between local facilities and the Faslane bases? Earley Town Council believes that these issues should be dealt with in the proposed Masterplan/Infrastructure SPD.

#### **Policy ER1 – Meeting Employment Needs**

Earley Town Council fully appreciates that employment plays an important part in the economic success of the local area. However, with the expansion of Thames Valley Science and Innovation Park by a floor space of approximately 18,500sqm, along with the proposed film studios, and British Museum, the potential increase of the number of employees at the Park will have an impact on the surrounding infrastructure. The Town Council asks Wokingham Borough Council to ensure that adequate Travel Plans are in place to help reduce the impact of traffic on all surrounding areas; and consider future sustainable transport options, including a Park & Ride, for employees to travel to and from the Park and improvement of the current pedestrian/cycling facilities from Lower Earley Way, that go over the M4 to the Park, which require more adequate signposting and lighting.

Due to the number of employees at the Thames Valley Science Park, Wokingham Borough Council need to ensure that the park is socially pleasing for employees, with the planting of trees, shrubs, wild flowers etc., so that employees during breaks have somewhere to go which is visually pleasing, benefits the environment and helps to promote the positive physical and mental health and wellbeing of the employees.

#### **Policy ER10 – Whiteknights Campus**

As stated in paragraph 6.53, the anticipated growth of student numbers at Reading University to more than 20,000 students by the end of 2030 and a need for the provision of more student accommodation, will impact on Earley in view of traffic, parking and the possible increase of HMO planning applications. The numbers stated fail to incorporate the number of lecturers that will also be required to teach the growing number of students, plus ancillary staff. The new Faculty Building under construction has already generated significant parking and road safety issues around the roads of Pepper Lane, Harcourt Drive and Falstaff Avenue. Future building applications need to ensure that all contractors vehicles can be safely parked on site to avoid a repetition of the current problems.

The increase in the number of people accessing the Whiteknights Campus will create more traffic and more cars needing to park. Earley Town Council asks Wokingham Borough Council to ensure that they work with Reading University and Reading Borough Council on up-to-date Travel Plans for

students and staff, with the aim of controlling the number of vehicles travelling to the site, and also explore options of more sustainable transport, such as improving cycling facilities.

The Town Council would also ask if Wokingham Borough Council has questioned how much of a shortfall there is between the current and projected number of students in accommodation both on/off-site and the number of students requiring accommodation?

#### **Policy H5 – Affordable Housing**

The Town Council supports paragraph 7.41, as affordable Housing in the community is vital. It requires a robust approach to be taken to achieve and fulfil Policy H5, to meet housing needs targets as set out in the Housing Needs Assessment, January 2020.

#### **Policy H10 – Conversions and Sub Divisions of Buildings**

Earley Town Council supports this policy which will see parking standards being applied to HMO applications and is pleased to see, in paragraph 7.88, the requirement of a parking survey to demonstrate the viability of parking, especially parking off-site. Due to the proximity of Earley to Reading University, Earley Town Council would ask Wokingham Borough Council to ensure such surveys are carried out during term time, which will allow a realistic, more accurate demonstration of parking availability when students are in residence; and encourages Wokingham Borough Council to pursue bringing Article 4 direction, Class 4 HMO under Planning control to regulate the impact of parking on amenities in neighbouring suburbia.

#### **Policy H13 – Houseboat Moorings**

The Town Council supports this policy. Applying clear and consistent regulations, will be an improvement.

#### **Policy H14 – Development of Private Residential Gardens**

The Town Council supports this policy as this will help to reduce the unnecessary development of gardens which often results in an impact on the street scene, loss of space, overlooking and overbearing impacts on the amenity space of neighbours.

#### **Policy HC4 – Local Green Space**

Earley Town Council welcomes and supports the designation of Local Green Space in the Plan, specifically the land south of Reading Road, Bulmershe, Earley. We support the proposal to treat the site as two separate parcels (Appendix 8), both of which meet the national criteria of Local Green Space.

In our view the Policy needs to be more concise and focused. As formulated it is too permissive given that it must impose a high level of constraint upon development consistent with Green Belt. In addition, greater clarity is needed to ensure the consistency and certainty of future management decisions, based on a generic policy to protect green recreational open space, as recently adopted by Reading Borough Council. The Town Council suggests that the wording of Policy HC4 should be replaced by: *‘Proposals that would result in the loss of any of these areas of open space, erode their quality through insensitive adjacent development, or jeopardise their use or enjoyment by the public, will not be permitted’.*

The Town Council would also ask Wokingham Borough Council to include the following areas of land in Earley as Local Green Space:

Chalfont Woods and Chalfont Park  
Events Field, off Kilnsea Drive

The Wilderness area and Harris Gardens on the University of Reading Campus  
Laurel Park  
Loddon Fields  
London Road (the green area between A4 and the houses along London Road)  
Pearmans Copse  
Sol Joel Park  
Thames Riverside (from the Waterside Centre to Kennet Mouth)  
The Drive (green triangle)  
The Nature Reserve at Thames Valley Park

It is important that the areas are designated as Local Green Space in Earley, as they are areas of woodland, fields and green areas for outdoor sports and informal recreation. The sites provide visual amenity to the community, as well as wildlife habitats and corridors, bringing birds and wildlife to the areas. The sites also promote positive physical and mental health and wellbeing to Earley residents.

It would appear from Appendix 8 and Appendix 10 certain sections of the site are not shown as Local Green Space and would remain as SULV. The Town Council would like to see the whole site, including Highwood be designated as Local Green Space, to protect the area from small developments around the edges of the site. Again, like the sites listed above, Bulmershe, Woodley is of importance in its beauty and plant/wildlife diversity and provides social value to the community. It is vital that the areas are protected as Local Green Space, so they remain in place to support initiatives to tackle the Climate Emergency.

#### **Policy NE7 – Sites of Urban Landscape Value**

Earley Town Council notes and agrees with the proposed dual designation of the site Bulmershe, Woodley as Local Green Space and SULV, as this is likely to strengthen the protection afforded to this public amenity land.

#### **NE8 – Development and Flood Risk**

Earley Town Council would ask Wokingham Borough Council to consider requiring sequential tests for sections 3a, 3b, 3c and 3d if within Flood Zones 2 and 3. This is because minor non-residential extensions, alterations, householder development and changes of use can impact on the risk of flooding.

#### **NE10 – River Corridors**

The Town Council supports this policy and would ask Wokingham Borough Council to ensure that any flood defences installed are considerate and sensitive to the surrounding area.

This concludes the comments of Earley Town Council.

Dated: 16<sup>th</sup> March 2020