

EARLEY TOWN COUNCIL

Response to the Wokingham Borough Council's Local Plan Update: Proposed Submission Plan (Regulation 19) consultation.

Earley Town Council (ETC) welcomes the opportunity to respond to WBC's Local Plan Update: Proposed Submission Plan (Regulation 19) consultation and has previously responded to the original WBC LPU Consultation (March 2020) and the LPU: Revised Growth Strategy Consultation (January 2022).

ETC recognises that representation to the consultation should focus on the soundness of the plan, the duty of WBC to consult and the legality of the plan. ETC is also pleased to see that previous representations made to WBC have been included in the LPU with policies that address specific issues in Earley.

Policy C5: Parking and electric vehicle charging

Tackles the problems with parking associated with garage conversions and building extensions.

Policy H8: Conversion and sub-division of buildings

Tackles the problems with parking associated with HMOs.

Policy HC4: Open spaces, sports, recreation and play facilities

Gives opportunity to provide facilities at the Loddon Valley Garden Village, such as 3G sports pitches, which there is no space in Earley for.

Policy H3: Affordable Housing

ETC welcomes the increase in affordable housing.

Policy HC3: Local Green Space

ETC welcomes the designation of LGS to the sites it proposed, including the Chalfont Woods/ Area DD sites and that ETC's challenge to the original wording of this policy has been noted.

Previous LPU Consultations

ETC was originally opposed to the strategic development location at Hall Farm, now called Loddon Valley Garden Village. However, as this is now planned to go ahead, ETC is pleased to see that concerns previously raised by ETC have been addressed: -

- high quality designs
- built to foster a community
- not car dependent
- self-contained facilities

Current Local Plan Update: Proposed Submission Plan (Regulation 19) consultation.

ETC would seek assurance from WBC on the following issues in relation to the Loddon Valley Garden Village, that are considered to be the main concerns for Earley residents.

Traffic

There are many pages devoted to the traffic modelling and it is noted that several of the detailed road systems layouts differ significantly from the November 2021 documents, not all of them representing further increased capacity.

However, common sense would say that there will be a significant increase in vehicle movements along Lower Earley Way (East & West locations), Meldreth Way, Hatch Farm Way, the Showcase roundabout and the Shinfield Arms roundabout.

Q: Can the traffic situation be explained, in simple terms, to ETC and Earley residents, to reassure them that Loddon Valley Garden Village will not add to existing traffic congestion on the main routes along the southern edge of Earley?

In addition, ETC would like to draw attention to the following points:

- 1. The LPU does not mention the possibility of the Royal Berkshire Hospital relocating to the Thames Valley Science Park and the subsequent, considerable knock-on effect this would have on the road network around Earley.
- 2. The LPU does not have any proposal to widen Lower Earley Way at the bridge across the River Loddon. This would seem to be an obvious bottleneck in the road network.
- 3. There have been recent, serious accidents on Meldreth Way, at the roundabout junction with Cutbush Lane/Westminster Way/Carshalton Way. There is nothing in the LPU about how road safety is to be improved, or traffic reduced on this road, given that it is to be directly connected the LGV by a 4-lane bridge across the M4 motorway.
- 4. With respect to public transport connection from Loddon Valley Garden Village, we draw attention to the recently published research paper "Location of Development" from the Royal Town Planning Institute, November 2024 and one of their key findings about new housing developments: "There was little or no improvement in the take up of public transport over the option of driving to local facilities from newly approved homes. The car as a mode of transport was 1.5 times faster nationally to reach key destinations from residential development, including 2 times faster to reach hospitals."

Q. Does this report not call into doubt the claims about public transport use from the proposed LGV development, and support the similar concern raised by ETC in their previous response to the LPU?

Flooding

The Loddon Valley Garden Village location is currently agricultural in nature and as such, in conditions of heavy rain, a great deal of the water is absorbed into the land providing vital attenuation before finding its way into the River Loddon and its tributaries. Flooding especially downstream can result in the blocking of Lower Earley Way by the Hilton Double Trees Hotel roundabout and the southern half of the Showcase Roundabout, which then causes massive (albeit short lived) traffic disruption.

The below picture shows flooding at the Showcase roundabout as recent as January 2024: -



Q. Can the flooding situation be explained, in simple terms, to ETC and Earley residents, to reassure them that the Loddon Valley Garden Village development is not going to make flooding in and around Earley any worse?

Conclusion

Whilst it is noted that the proposed maximum number of developments in relation to Loddon Valley Garden Village is reduced from 4500 to 3950, ETC still has concerns in view of the traffic and flooding impact on Earley.

ETC also has a specific challenge to a small element regarding the test of soundness of the LPU: -

Local Green Space, Land South of Reading Road, Earley, LPU Appendix K (LGS007A) and Policies Map C1, Bulmershe North. Land at Bulmershe and Addington Schools.

ETC notes that the need for development at Bulmershe and Addington Schools is considered likely within and/or beyond the Local Plan period.

The schools are valued institutions within the local community and ETC agrees that their reasonable operational requirements should not be prejudiced going forward. However, the proposals to exclude significant areas of school land from the proposed Local Green Space as currently formulated would in ETC's view create an unsatisfactory planning vacuum of uncertainty within the Bulmershe Site of Urban Landscape Value - in turn leading potentially to piecemeal ad hoc development proposals within a longstanding area of acknowledged importance.

For these reasons, the proposals as formulated have not been sufficiently justified and the plan may, in some respect be considered unsound having regard to the test at paragraph 35b of the current National Planning Policy Framework.

The following modification is therefore suggested to the plan: -

PROPOSED MODIFICATION (Insert after Para 14.66)

'Two areas of land adjoining Bulmershe and Addington Schools respectively have been excluded from Local Green Space designation in order to ensure that the operational requirements of the schools are not prejudiced over the longer term, both areas lie within a Site of Urban Landscape Value (SULV). Therefore, in order to reduce uncertainty and to avoid harmful piecemeal development, development briefs will be required to be prepared and approved following consultation to provide a framework for any future planning applications. Briefs should identify constraints and resolve impacts including on SULV designation, where openness is a primary concern at Bulmershe.

Development at Addington School will be contained within the existing site and not result in the loss of adjoining public open space to accommodate replacement play area facilities.'

This concludes the comments of Earley Town Council.

Dated: 12th November 2024