



By e-mail only

Reading Borough Council
Strategic Transport
Reading Borough Council
Civic Offices,
Bridge Street
Reading
RG1 2LU

26 August 2020

Dear Sir / Madam

Reading Transport Strategy 2036

The Chiltern Society is a charitable body with 7000 members. We campaign for the conservation and enhancement of the Chilterns, which includes the Chilterns Area of Outstanding Natural Beauty (AONB) and part of the London Green Belt. Our role in the planning system is co-ordinated through a network of voluntary planning field officers and co-ordinators.

The Society's area includes the part of Reading Borough that is located to the north of the River Thames.

The Chiltern Society strongly objects to the inclusion of the Third Thames Crossing and the North Reading Orbital Route within the Transport Strategy. These are not sufficiently justified through environmental assessments and do not have the support of South Oxfordshire District Council or Oxfordshire County Council. The development of the new road and the increase in traffic to the north of Reading would have a significant detrimental impact on the Chilterns AONB and many of the area's villages and towns.

More specifically -

- A full Environmental Impact Assessment (EIA) must be undertaken before any decision is made on the principle of a new crossing and Orbital Route. Given that the Orbital Route would be located within the AONB and its setting, then it is essential that this includes a Landscape and Visual Impact Assessment. This must assess both visual impacts and impacts on landscape character. The Integrated Impact Assessment does not adequately assess the impacts of these developments and does not recognise or assess the significant impacts that are likely to the AONB and traffic levels on the roads of South Oxfordshire
- A detailed assessment of traffic impacts on South Oxfordshire and the AONB must be undertaken to predict future traffic levels in South Oxfordshire and particularly towns such as Henley. The assessment would also need to assess what mitigation measures could be undertaken and what the residual impact would be on the AONB. This assessment should include the potential detrimental impacts in association with the proposed Ox Cam Expressway, which would exacerbate pressures on the Chilterns AONB and which remains very controversial. This could lead to a significant number of additional trips through the Chilterns, with motorists seeking to avoid the A34.

The Chiltern Society, White Hill Centre, White Hill, Chesham, Bucks, HP5 1AG
Tel: 01494 771250 e-mail: office@chilternsociety.org.uk www.chilternsociety.org.uk

Patron: The Earl Howe President: Michael Rush

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- For the proposal to go ahead, the Council would need the support of South Oxfordshire District Council and Oxfordshire County Council. The bridge and Orbital Route are not referred to in the emerging SODC Local Plan or the draft Oxfordshire Local Transport and Connectivity Plan. Before the proposals are included in the Reading Transport Plan, the Council need to demonstrate collaborative working and a joined-up approach to considering environmental impacts.
- We note that there is a commitment in existing Local Transport Plan to work with Wokingham BC, SODC and OCC, but there is no evidence of this in the emerging plans across the two counties.
- The Society are working with the Chilterns Conservation Board to create a shared Chilterns Transport Strategy, covering the AONB and its setting. This seeks to build on Policy DP14 of the Chilterns AONB Management Plan 2019-2024, which is worded as follows –

“DP14 - Avoid new or upgraded infrastructure (roads, railways, airports, pylons, masts etc.) which harm the AONB landscape, nature, air quality, tranquillity or the visitor experience. Fully assess impacts on the AONB, including increased recreation pressure, traffic, overflying and severance of ecological connectivity in the AONB. Avoid, mitigate and compensate to achieve a net gain for the AONB.”

The proposed outcomes from the Strategy include –

- protection and enhancement of the special quality of the Chilterns
- protection and enhancement of the Chilterns natural, historical and cultural heritage
- enhancement of the visitor experience and accessibility into and within the area
- protection of the wildlife and biodiversity in the Chilterns
- support for local businesses and the local economy
- enhancement of the quality of life for people who live in the Chilterns area

The proposed Orbital Route and Third River Crossing have the potential to jeopardise these future outcomes. These should be addressed as part of the Council’s statutory duty under the Countryside and Rights of Way Act 2000 to conserve and enhance the natural beauty of the AONB.

- Government Policy, including the 25-year Environment Plan, is developing processes to require developments to demonstrate net biodiversity gain. This needs to be fully assessed, both as a result of the bridge and Orbital Route and the wider countryside of South Oxfordshire. The Society has recently published a Manifesto for Chilterns Wildlife <https://chilternsociety.org.uk/chiltern-manifesto/> to seek to development landscape-scale ecological enhancements across the Chilterns. The bridge and Orbital Route have the potential to cause significant ecological harm and it is unlikely that the Council would control sufficient land to be able to demonstrate a biodiversity net gain.
- The Strategy needs also to consider whether Covid-19 will change the amount and/or way we travel. If working from home remains much more widespread, there will be less demand for travel. Investment in public transport systems, including rapid transit systems within Reading, seems a more appropriate response than developing new roads to encourage more cars. More emphasis could also be put on walking and cycling.
- The Society also queries how the developments would be is consistent with two of Council's overarching objectives for the Strategy (para 2.9), viz:

“Creating a Clean and Green Reading: Provide transport options to enhance quality of life, reduce emissions and improve air quality to create a carbon neutral town” and

“Connecting People and Places: Promote the use of sustainable modes of transport by providing attractive alternatives to the private car, helping to provide a transport network that is fast, affordable, connected and resilient”;

...and to the commitment of the Council as a whole to achieving zero net carbon by 2030, alluded to at 2.26: *“We have pledged to aim for a carbon neutral Reading by 2030”.*

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The Council must provide clear evidence that this scheme will reduce carbon emissions, which is suggested to be the case by scoring this scheme with three ticks against “Creating a Clean and Green Reading” in the table between 6.40 and 6.41. It may have the effect of reducing carbon emissions in the Caversham area, but would lead to a significant increase in carbon emissions and reduction of air quality in the rural parts of South Oxfordshire.

- We understand there is likely to be a proposal for 3 new park and ride sides, which will be located in the Chilterns, and possibly within the AONB. Each of these, on their own, has potential to have quite significant environmental impacts in terms of landscape and ecology, as well as increasing traffic movements. These will need to be assessed separately.
- It also needs to be recognised, through transport assessments, that any new road will also increase visitor numbers to the Chilterns. If the Chilterns were to become a National Park, as recommended in the Glover Review 2019, the demand for access could increase further. The impact of the road on visitor locations must be a key part of an EIA.
- In order to justify the cost of developing the bridge and Orbital Route, there is likely to be pressure for increased housing development on the northern edge of Caversham. In this location, the Chilterns AONB is close to the edge of the built-up area and there is a real danger of pressure building for development between the new road and the edge of the settlement and out into the AONB. Such development would be contrary to Paragraph 172 of the National Planning Policy Framework as it relates to major developments. Our view is that the cost of the new road link is unlikely to be justified without significant harm to the AONB and huge pressure on existing settlements through increased traffic.
- We understand that there was a funding bid in 2019 for £800K by Transport for the South East for developing the latest business case, which is awaiting a decision by the Government. A significant part of this funding should be used to prepare a detailed Environmental Impact Assessment and to agree a joint approach with the Oxfordshire Councils.

The Chilterns Society’s policy is to strongly oppose the crossing and Orbital Route due to unacceptable and significant impacts on the Chilterns. We would be prepared to offer further comments once impacts on South Oxfordshire and the Chilterns AONB have been fully assessed and detrimental impacts addressed through a detailed business case and an EIA. We do not, however, expect these developments to be justifiable due to their significant environmental impacts.

Yours faithfully

Colin Blundel MRTPI
Planning Officer