

From: Tony Cowling  
Sent: 24 August 2018 17:54  
To: Programme Officer  
Subject: Re: Reading Local Plan Hearing

Thanks for this, I am not sure that I am capable of speaking as I don't understand "planning jargon, the special, vocabulary used by planners."

I attach below a written submission in the hope that it may be taken into account, my main concern is at the high level and I am concerned to see that RBC are compliant; in my mind there are some big questions about RBC listening to and taking on board the RCCP strategy and this in itself leaves them non compliant as they seem not to have embraced it.

And some more general notes:-

I attach the notes I sent before but don't have time to align the docs

Reading strategic plans

Domestic new buildings - following the retraction of the Code for Sustainable Homes the building regulations have been left to pick up on dealing with the design standards of new homes. In Reading we are currently a long way behind the best practices that can be seen in other places in England. Exeter City Council and several leading housing associations are building to Passive House standards and our own strategies and policies recommend building to a robust low energy standard - yet this is not happening. Reading use BREEAM for non domestic buildings but even there is not applied to maximum benefit.

There are many problem areas, with the advent of private building control there is little information or feedback on what is going on in the field. Further it is well known that there is a considerable disconnect between design and what is actually built, this is known as the 'performance gap' and it should be addressed as a matter of urgency to protect the people in our communities who will have to live in an increasing number of these underperforming homes.

Standards that could be adopted include; Passive House, Minergie, LEED, CSH, AECB or others but a low energy standard should be adopted.

Domestic existing stock - a heavy reliance on the "Green Deal" has been built into our strategies and policies and with its demise we should be offering or facilitating something else as a replacement. At present and in the past there has never been any enforcement action when refurbishment is carried out below the standards required or as in the cases of huge numbers of improvements, possibly the majority which completely ignore the regulations that are in place. These regulations are known as Part L1b of the current building regulations and require for instance lofts to be insulated on re-roofing, walls to be insulated on replastering or re rendering. Generally totally ignored with no downside.

Domestic tenanted properties - 'the landlord problem' very much still exists in Reading with huge numbers of landlords having no interest in or reason to improve their properties.

New Commercial Buildings - in theory these should comply with BREEAM but in practice this standard has several levels and too often finished buildings fall below the intended standard.

Existing commercial buildings - many of our older commercial buildings perform very poorly in terms of energy usage. Landlords have no incentive or reason to improve the fabric and tenants are rarely interested as they may never be able to recoup their investment leading to understandable widespread reluctance to carry out improvements.

Renewable Energy - the council has a good record on installing solar panels on both its own buildings and on social housing. All Schools, community buildings and charities in Reading have been offered free solar panels by Reading Community Energy Society but uptake has been very low and disappointingly to date no school has taken up their offer. Reading Hydro, a community benefit society, are working hard to bring to fruition an extremely challenging project to install hydroelectric generators on the Thames at Caversham.

Lighting - the rapid changes in the economics of converting existing lighting to new LED luminaries has brought about equally rapid uptake of these products. There are some instances where poor decisions have been made with adverse influences on wildlife, more light pollution despite less energy being used. In general the savings that are being made are less than those that had been anticipated as new lighting is brighter, on for longer and over specified, all of which diminish the expected savings. Reading should develop a strategy that helps with the specification of lighting, talks about colour spectrum, dimming and trimming, and control in general.

Water refilling stations needed on all new developments, on upgrading existing public buildings, schools and the like and through the town and its suburbs.

Litter has both a high cost and an adverse impact on the environment and we should be seeing a reduction of the problem.

Recycling - this is an area where we have seen good progress but there is still work to be done in terms of reducing waste in the first place,

Dr Tony Cowling.