

**Reading Friends of the Earth** – [www.readingfoe.org.uk](http://www.readingfoe.org.uk) – [info@readingfoe.org.uk](mailto:info@readingfoe.org.uk)

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### **Reading Local Plan examination – 2018 - additional written material**

Reading Friends of the Earth would like to submit additional written material as follows.

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#### **Issue 4. Are the Cross Cutting Policies justified, deliverable and consistent with national policy?**

- *Q1. In assessing the viability of the LP has the effect of the requirements of policies seeking contributions and standards (for example in Policy H5) been taken into account, and if so is this robustly demonstrated?*
- *Q2. Whether Policy CC1 is justified and effective having regard to national policy? Does the submitted plan properly reflect the presumption in favour of sustainable development in the NPPF?*
- *Q3. Is there sufficient justification supported by the evidence for applying Policy CC2 to all development within the Borough? Is the approach to BREEAM consistent with national policy?*
- *Q4. Is the plan positively prepared in relation to climate change? Having regard to the Policy CC3, CC4 and other policies within the LP, would the LP be effective and consistent with national policy and legal requirements in relation to climate change?*

#### **Additional written material on Issue 4**

**Issue 4: Q1 and Q4:** refer to our comments on H5 and CC4 in pre-submission draft. We believe our suggestion to require preparation for low-carbon heating by heat pumps and district heating should be upheld.

Note that:

#### **Revised NPPF**

Para 151 specifically says plans should “help increase the use and supply of renewable and low carbon energy and heat”

#### **Committee on Climate Change 2018 Progress Report to Parliament**

<https://www.theccc.org.uk/wp-content/uploads/2018/06/CCC-2018-Progress-Report-to-Parliament.pdf> contains much supporting evidence

- Executive Summary says
  - “The UK is not on course to meet the legally binding fourth and fifth carbon budgets.
  - We cannot yet define the 2050 systems for carbon capture, zero-carbon transport, hydrogen or electrification of heat, but the Government must now demonstrate it is serious about their future deployment.
  - Clean Growth Strategy includes ‘Phasing out installation of high-carbon fossil fuel heating in homes and businesses off the gas grid during the 2020s.’

- Box 3.6 “Delivering new buildings which are fit for 2050 and beyond: research on cost-effectiveness of lower-carbon new build” says :
  - “The emerging results support our existing recommendations on heat pump readiness, on the cost-effectiveness of low-carbon heat from mid 2020s, and on the need to integrate adaptation measures.
    - Larger radiators are found to be the key measure capable of minimising the costs of retrofitting low-carbon heat in the future, with some immediate bill savings.
    - Our modelling for the fifth carbon budget advice showed that heat pumps are cost-effective in the second half of the 2020s in new-build homes. Low-carbon heat networks are cost-effective now in highly heat-dense areas, with cost-effectiveness becoming more widespread through the 2020s. These findings are supported by the new modelling.

Issue 4: Q3: refer to our comments on CC2 in pre-submission draft. We believe our suggestions of requiring higher insulation standards should be upheld. An overall BREEAM score does not adequately address energy consumption and therefore carbon emissions.

We believe that the Planning and Energy Act 2008 (“the 2008 Act”) says that local authorities may include in their local plans reasonable requirements for development in their area to comply with energy efficiency standards that exceed the energy requirements of Building Regulations.

Low-carbon heat supply will place excessive demand on electricity or hydrogen supplies for heating unless buildings are well-insulated.

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**Issue 5. Are the policies for the Built Environment justified, deliverable and consistent with national policy?**

- *Q7. Is the approach to air quality within the area as set out in EN15 justified, and will the policy be effective?*

**Additional written material on Issue 5**

**Issue 5: Q7:**

A strong approach to air quality is justified because Reading’s air quality is marginal to WHO standards and these standards are not ‘safe threshold’ levels – as the Plan states in 4.2.74 to 4.2.77.

We did comment generally on EN15 in our response to the Draft Local Plan in June 2017. For reference our key points were:

- Not clear how a detrimental effect can be ‘mitigated’
- The Policy says development should not be permitted if it ‘would significantly worsen air quality’. This is too lenient and open to debate. Policy should aim for ‘Clean Air Everywhere’.

- 'local worsening in air quality' should only be allowed if the predicted levels are substantially below national and WHO target levels.

In our comments on the Pre-Submission-Draft we commented on paragraph 4.2.81 which relates to requirement for an Air Quality Assessment and suggests it would 'broadly speaking' be 'likely' to be required if development:

- "Would include significant amounts of car parking, for example 100 spaces, or would significantly increase current provision, for example by 25%;"

In our opinion:

- 100 spaces is too high a threshold – while requiring AQA for all development may be excessive a much lower threshold than 100 should be adopted.
- 25% increase is a vague provision -

In our opinion the Policy EN15 is too vague ... it should set criteria on when AQA should be undertaken and describe what 'mitigation' might mean.

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Final version. 12<sup>th</sup> September 2018.