#### COMMITTEE REPORT

BY THE DIRECTOR OF ENVIRONMENT AND NEIGHBOURHOOD SERVICES READING BOROUGH COUNCIL ITEM NO. 9 PLANNING APPLICATIONS COMMITTEE: 30 May 2018

Ward: Abbey/Out of Borough App No.: 171108/REG3 and 171662/ADJ

Address: Land between Thames Valley Business Park and Napier Road, Reading Proposal: Construction of a segregated fast-track public transport, pedestrian and cycle bridge and viaduct, comprising concrete bridge structure with a river span of 59.5m and a land span of 316m, supported by concrete columns, steel beams and reinforced soil embankment, together with new footpath links and existing footpath alterations, replacement supermarket car parking provision, junction improvements and landscaping. Applicant: Reading Borough Council Highways and Transport

Date received: 4 July 2017

Major Application with EIA: agreed PPA date: 27 July 2018

**RECOMMENDATION:** 

In consideration of the Environmental Statement which has been received under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 and subject to no objections being received from the Environment Agency, delegate to the Head of Planning, Development and Regulatory Services (HPDRS) to **GRANT Regulation 3 planning permission**, subject to the satisfactory completion of a s106 agreement/unilateral undertaking by 27 July 2018 to provide for:

- Use of the structure/route as a segregated mass rapid transit (MRT) public transport, pedestrian and cycle route only, for use only by permitted authorised vehicles (buses, minibuses, public coaches and, in emergencies only, emergency vehicles);
- Construction of the structure to an adoptable standard and thereafter to function as Public Highway under s.38 of the Highways Act 1980
- Completion of compensatory flood storage works and repair of riverbank near to the Kennetmouth within Wokingham Borough and Reading Borough, as appropriate, no later than substantial completion of development.
- Provision of community/art facilities (relocation of mosaic model/sculpture and provision of strategy for benches and storyboards) prior to first use. Submission of strategy no later than commencement of development.
- Developer to undertake or otherwise fund a construction phase Employment and Skills Plan (ESP)
- Mooring controls for 3x short-stay visitor mooring platforms
- Phasing controls: no first use of MRT route until all environmental mitigation works have been completed to the Local Planning Authority's satisfaction
- Post occupation monitoring/management requirements (ecology management, marginal shelf, wetland).

If the s106 agreement/unilateral undertaking is not completed by 27 July 2018, delegate the HPDRS to REFUSE planning permission, unless an extension of time is agreed.

Also:

1. Notify Wokingham Borough Council of your Resolution; and

2. To advise WBC of no objections to the identical pending application submitted to Wokingham Borough (RBC reference 172662/ADJ and WBC reference 172048).

# Conditions to include:

- 1. Time limit: five years (major development scheme)
- 2. AP1 Approved plans
- 3. AP4 Phasing: as approved
- 4. M2 Materials to be as approved
- 5. Submission of details of cross-bracing for bridge and any other technical design details (e.g. accessibility details)
- 6. AC1 Archaeology, submission of archaeological method
- 7. Contaminated land: piling design
- 8. Contaminated land: reporting of unexpected contamination
- 9. Works as per approved plans/specifications
- 10. Landscaping conditions (details to be advised)
- 11. DC1 Vehicle parking space provided in accordance with approved plans (superstore car park changes)
- 12. Visibility splays provided before occupation
- 13. Gradient of route no greater than as shown on submitted plans
- 14. Submission and approval of on-site and off-site Landscape and Ecology Management Plan
- 15. Construction Method/Management Statement
- 16. SUDS Strategy condition 1
- 17. SUDS Strategy condition 2
- 18. Hours of working (std.)
- 19. No bonfires
- 20. External lighting, details to be submitted (pole-mounted and parapet lighting)

## Informatives:

- IF1 Positive and Proactive Working approval
- IF2 Pre-commencement conditions
- IF3 Highways Act
- IF4 S106
- IF5 Terms
- IF6 Building Regulations
- IF7 Complaints about construction
- IF9 Contamination and risk to construction workers
- I11 CIL
- I12 Bats
- I23 Advice to adhere to approved Arboricultural Method Statement
- OTH Notification to Environment Agency for Accommodation Licence for works over the Kennetmouth and for siting of short stay visitor mooring platforms/marginal shelves
- OTH Any temporary requirement for diversion/closure of footpath/cycleroute to be applied for separately
- Network Rail informatives
- Please note the presence of a high voltage sse cable in this area

#### 1. INTRODUCTION

- 1.1 The application site is long and thin, typically some 40 metres in width and approximately one kilometre end to end and stretches from Napier Road, Caversham in the West, to the Thames Valley Park roundabout within Wokingham Borough, in the East.
- 1.2 The western area of the site (within Reading Borough) where the proposed development would connect with Napier Road comprises mostly unused, overgrown land that had previously been the line of the former 1908s 'cross-town' road route which was abandoned. The route in this area would also take in a section of the Tesco Extra superstore car park/car park circulation road. Residential apartment blocks are located to the west of the site and north of Napier Road at Luscinia View. The land immediately to the south and west at this point is characterised by commercial development and surface level car parking and hard standing, with the Great Western Main Line Railway running east-west beyond on a raised embankment. Part of the route then falls within the Coal Woodland LWS ('Coal, Kennetmouth and Kings Meadow East' Local Wildlife Site (LWS)) which is a self-seeded woodland on the Thames Riverside, near to the western side of the Kennetmouth.
- 1.3 The central area of the site where the proposed development crosses the River Kennet is characterised by the confluence of the River Thames and the River Kennet. There is an existing railway bridge over the River Kennet and the attached 'horseshoe bridge' (footbridge) allowing access over the Kennet for the Thames Path National Trail. This application proposes a third bridge crossing closer to the Thames.
- 1.4 The eastern area of the Site (within Wokingham Borough), is where the proposed development would run adjacent to the proposed Thames Valley Park Park and Ride (TVP P&R, which gained planning permission in 2017 and currently under construction), is undeveloped floodplain adjacent to the River Thames. The Thames Valley Park Rowing Club and Wokingham Waterside Centre lie in the eastern part of this area. The former Dreadnought pub, which has had planning permission for a café use, although this has not been implemented, lies to the north-east. There are also temporary visitor moorings along the Southern bank of the River Thames, east of the Kennetmouth. The Thames and Kennet Marina and Redgrave and Pinsent Rowing Lake are located approximately 100 metres to the north on the opposite side of the River Thames in South Oxfordshire District. The Suttons Business Park is located to the south of the railway embankment.
- 1.5 The Environment Agency (EA) Flood Map shows that the western part of the proposed route lies within Flood Zone 2 'Medium Probability' (between 1 in 100 (1%) and 1 in 1000 (0.1%) annual probability of river flooding). The eastern part of the proposed route lies within Flood Zone 3 'High Probability' (greater than 1 in 100 (1%) annual probability river flooding). The land to the west of the River Kennet is situated on a historical landfill that was used in the past for railway sidings. The land to the east of the River Kennet comprises undeveloped land which includes two historic gravel pits. The Grade II Listed Railway Bridge and attached Accommodation ('Horseshoe') Bridge over the River Kennet are close to the proposed new crossing of the proposal at the Kennetmouth. The Borough's Air Quality Management Area also extends along the railway line, although electrification is likely to lead to better localised air quality. The Thames Path

National Trail and National Cycle Routes 4/ 5 Thames Valley pass through the site on the south bank of the River Thames.

# Application site boundary (not to scale)

Luscinia View flats Tesco The Coal Woodland Kennetmouth (Borough boundary)



Bristol-London Paddington railway line Gasholders P&R site Suttons Business Park

# 2. PROPOSAL

- 2.1 The proposal is for the construction of a segregated fast-track public transport, pedestrian and cycle route, which is designed to support enhanced accessibility and continued sustainable growth in Reading, Wokingham Borough and the wider area into Bracknell Forest Borough. It will be constructed as part at-grade road, part bridge and part viaduct structure in order to convey primarily buses, but also cycles and pedestrians, between Central Reading and Thames Valley Park, providing a bypass to the A4 London Road and Cemetery Junction area and linking directly to the A4 and A3290 to the east of Central Reading, providing a significant priority for these sustainable transport modes.
- 2.2 The applicant is Reading Borough Transport, supported by Wokingham Borough. It is part-funded by the Local Enterprise Partnership (LEP) and, in contrast to the two other MRT schemes in the Borough, the application site straddles the borough boundary to include land within Wokingham Borough. The overall purpose of the East Reading MRT scheme is to improve the attractiveness of travelling more sustainably, thereby reducing private car trips, easing forecast car congestion and

improving air quality along the existing highway network, particularly on the A4 corridor in Reading Borough.

- 2.3 The applicant advises that the scheme seeks to achieve the following key aims:
  - Provide a sustainable alternative solution to accommodate future travel demand on the London Road corridor;
  - Increase capacity for movement of people thereby reducing journey times and forecast congestion, as well as improving reliability of journeys along the corridor;
  - Support economic development in Reading Town Centre, east Reading, Wokingham and within the Thames Valley;
  - Develop a high quality, sustainable system which provides a sustainable alternative to the private car;
  - Facilitate a future MRT network for Reading and the Thames Valley; and
  - Allow access for mobility impaired people and pushchairs.
- 2.4 The route of the East Reading MRT scheme will link the A3290 at Thames Valley Park adjacent to the proposed new Park & Ride facility which is currently under construction, to Napier Road, Reading town centre and the railway station.
- 2.5 The development is primarily constructed of a long, sectional concrete structure and includes patinated steel girders and concrete for the bridge, a concrete viaduct with steel parapets and steel supports, new landscaping and extensive ecological enhancements in mitigation, including dedicated ecological areas and repairs and enhanced mooring areas on the Thames.
- 2.6 The MRT structure itself has been designed to allow buses to pass each other along its length, except for the bridge, where an automated (non-traffic light) system would control single lane bus crossings alongside a dedicated cycle/pedestrian path. The elevated section of the pedestrian/cycle route will be illuminated from linear lighting in the top parapet rail on the south side of the bridge/viaduct for highway safety/CCTV purposes.
- 2.7 The proposal involves the following elements, running West to East:
  - A new T-junction on Napier Road near to the Tesco superstore/Luscinia View flats
  - A gentle embankment created along the southern edge of Tesco car park/The Coal Woodland, with a connecting footpath/cycle access track to the south
  - The embankment gently grades into the abutment of a new bridge crossing over the Kennetmouth, set away from the Listed Brunel Bridge and accommodation bridge (Horseshoe Bridge)
  - On the eastern side of the Kennetmouth (in Wokingham Borough), the bridge becomes a viaduct, supported by single 'flared' T-shape columns
  - The MRT arrives back at ground level and then forms a new junction at the Thames Valley Park roundabout, next to the proposed park and ride site.

## Supporting documentation

2.8 Supporting documentation submitted with the application is extensive and is listed below. The majority of these documents have been revised since the original submission of the application in July 2017.

- Cover letter and revised covering letter
- Planning Statement
- Design and Access Statement and Annexe (containing artist's impressions of the scheme)
- Consultation Statement
- Environmental Statement (contains chapters on a range of matters, see below)
- Environmental Statement Addendum
- Environmental Statement: Non-Technical Summary
- Landscape and Ecology Strategy
- Topographical survey
- Ecological response to the Environment Agency's concerns (Feb 2018)
- Sustainability Statement
- Transport Statement (contained in the ES)
- Transport Statement Addendum
- Supporting sectional plans
- Utilities Statement
- SUDS strategy
- CIL form (this is not a CIL-liable development)
- 2.9 The Environmental Statement contains the following chapters:

ES Volume 1 chapters: Socio-economics Transport & Access Air Quality Hydrology and the Water Environment Ground Conditions Landscape & Visual inc. Lighting Ecology Archaeology and Heritage

ES Volume 2 Appendices, including: Flood Risk Assessment and Drainage Strategy Phase 1 Ground Conditions Assessments Phase 2 Ground Conditions Assessments Tree Survey Arboricultural Impact Assessment Lighting Assessment Preliminary Ecological Appraisal (and other baseline survey reports) Heritage Desk-Based Assessment

## 3. PLANNING HISTORY

3.1 Relevant planning history is as follows:

Reference	Description	Status/comment	
161174/PREAPP	Pre-application advice for proposed new mass rapid transport scheme	OBSERVATIONS 11/7/2017	SENT
161515/SCO	Request for a Scoping Opinion for East Reading Mass Rapid Transit under Regulation 13 of the Town and Country	25/11/2016	PROVIDED

161167/ADJ	Planning (Environmental Impact Assessment) Regulations 2011 (As Amended 2015)Full application for the proposed development of a Park and Ride facility providing approximately 277 vehicular spaces, motorcycle parking's and associated vehicular access and landscaping.	OBSERVATIONS SENT TO WBC 20/9/2016
RBC reference 171662/ADJ and WBC reference 172048	Full application for proposed construction of a segregated fast-track public transport, pedestrian and cycle bridge and viaduct, comprising concrete bridge structure with a river span of 59.5m and a land span of 316m, supported by concrete columns, steel beams and reinforced soil embankment, together with new footpath links and existing footpath alterations, replacement supermarket car parking provision, junction improvements and landscaping.	PENDING CONSIDERATION This is the identical planning application in Wokingham Borough. Recommendation to RBC Planning Applications Committee to supply to WBC is in the Recommendation above.

# 4. CONSULTATIONS

- 4.1 It should be noted that the application has been subject to significant amendments since its original submission in July 2017. Amendments submitted in April/May 2018 were summarised for consultation purposes as follows:
  - 1. Viaduct to narrow by one metre in a localised area to the East of the Kennetmouth (i.e. at the narrowest point on the riverbank)
  - 2. Minor realignment of the route to the South of the Tesco superstore car park West of the Kennetmouth, reducing land-take on the car park and The Coal woodland
  - 3. Removal of some originally-proposed replacement car parking within the Tesco superstore car park, reducing impact on The Coal woodland
  - 4. Two-column supporting design of the viaduct now altered to single 'flared' column
  - 5. Lighting columns along the viaduct in original proposal to be replaced with low-level parapet lighting
  - 6. Provision of three new short-stay visitor mooring platforms on the River Thames (North Bank, East of the Kennetmouth), with associated riverbank planting
  - 7. Landscaping amendments to include removal of 'fedging' and reclaimed boats in original proposal and provision of wetland/marsh area under viaduct, retention of Willow tree to East of Kennetmouth and other off-side mitigating environmental improvements
  - 8. Amended locations for compensatory flood storage (ground lowering).
- 4.2 The responses set out below intend to summarise the consultee's position on the application and this includes their response to the amended material above, if further responses have been provided.

# (i) Statutory:

The Environment Agency has been in close communication with the applicant and officers regarding this scheme. At the time of writing, their objection is maintained, although

officers expect that objections on flooding grounds have been overcome; and outstanding issues of conflict with EA Navigation Policy on the Thames and ecological concerns are likely to have been addressed also. These issues are discussed in the Appraisal below and will also be discussed further in the forthcoming Update Report.

**RBC Transport Strategy** has reviewed the submitted Transport Statement, which has been based on the Reading Transport Model and concurs with the methodology used. It has been stated that the Scheme results in reductions of between 1% and 3% in peak hour traffic flow along some of the eastern area roads. The modelling demonstrates that the scheme would release traffic constrained in entering the network, ease forecast congestion and reduce rat-running.

RBC Transport Strategy agrees that the case made for the MRT scheme is positive in terms of providing a sustainable transport solution. The applicant has confirmed through additional information that technical aspects of the proposal are acceptable.

Amendments to the car parking arrangement in the superstore car park are considered to be suitable.

The Appraisal section covers transport aspects in detail.

# (ii) Non-statutory:

**RBC Planning (Natural Environment) Team** (Tree Officer) raised strong objections to the original proposal in landscaping terms. Her current advice is that the amended information indicates that the scheme has less of an impact in environmental terms (for instance, lessened impact on The Coal and greater tree mitigation arrangements) but at the time of writing, she is unable to comment further as there appears to be inconsistencies and lack of details in the information currently presented. Her queries are currently with the applicant to respond to and the Tree Officer's revised comments shall be set out in the Update Report. **RBC's Retained Ecologist** objected to the original ecological proposals. His response to the amended information is awaited and this will be set out in the Update Report. Regarding both matters, the Appraisal below will discuss the main issues and how the application is now proposing to address these, with the detailed responses from the above two consultees to follow.

**RBC Environmental Protection** advises that the application raises the following issues:

- Noise arising from development
- Air Quality impact
- Contaminated land
- Construction & Demolition

The Appraisal below includes a section entitled, RBC Environmental Protection considerations.

**RBC Leisure and Recreation** advises that their concerns to the application as originally submitted regarding management of The Coal Woodland have been satisfactorily addressed, and Leisure and Recreation supports the latest amended landscape plan and ecological mitigation proposals which have been prepared.

**RBC SUDS Manager** advises that the SUDS Strategy is acceptable in terms of sustainable drainage and a SUDS scheme should be designed in accordance with the Strategy. Conditions are advised.

**RBC Emergency Planning Manager:** primary concern is flood risk and displacement of floodwaters and pleased to see that the proposal is largely raised on columns, but it must be built to withstand severe flooding situations.

The space underneath the viaduct structure may inadvertently create a potential for antisocial behaviour/rough sleeping and thus this needs careful thought. Removing any/minimising any dry hardstanding is the obvious choice to deter rough sleeping in the area, but this does not remove the potential for terrorism activity beneath such a structure/planting a device beneath it. However many such accessible structures already in the Borough and does not consider that the MRT itself would be a specific target.

A response from Thames Valley Police's Crime Prevention Design Advisor (CPDA) is awaited and this will be set out in the Update Report.

The RBC Conservation Consultant has commented as follows:

The location of the proposed MRT bridge over the Kennet to the north of the Grade II Listed Building would mean the proposed bridge would be partly screened from a direct visual relationship with the listed bridge by the existing (later) accommodation bridge, which is also part of the listing. The aesthetic elements of the north elevation of the railway bridge and later accommodation bridge are considered to be less significant than the southern elevation. The main significance of the Listed bridge is its evidential value as an industrial railway structure with the added historic value from being part of Brunel's design for the Great Western Railway line and communal value as an accommodation bridge. The bridge's aesthetic value to the north is diminished by the attached accommodation bridge. The setting of the Listed bridge is also considered to be largely industrial and utilitarian and therefore a further transport bridge in this location would not be out-of-character with the Listed bridge's setting.

There is considered to be some potential harm to the Listed Bridge from the proposed MRT bridge within its setting by restricting views toward it from the south, along the River Thames. However, it is acknowledged that the aesthetic value of the Listed Bridge's southern elevation is not substantial as the bridge's evidential, historic and communal value, due to the addition of an accommodation bridge along this elevation. The evidential, historic and communal significance of the Listed bridge would largely be unaffected by the proposed new bridge. Therefore, situating the proposed bridge to the south of the Listed Bridge is considered to be an acceptable location.

The design for the bridge, whilst largely functional, does include some design elements in the angled stone gabians and weathered steel i-beams which respond the setting of Brunel's bridge and are sympathetic to it. However, it is considered that using better quality materials for some peripheral elements, like the railings of the bridge, would provide a visually superior scheme for this communal space. In view of these considerations, there is no objection in principle to the proposed bridge design and location, subject to conditions requiring further detailing of the stone gabians, weathered steel, fencing, railings, signage and lighting

# The **Berkshire**, **Buckinghamshire and Oxfordshire Wildlife Trust (BBOWT)** strongly objects to the application on the following grounds:

- i) Development on Local Wildlife Site
- ii) Impact on Local BAP target species
- iii) Net gain in biodiversity not demonstrated
- iv) Failure to observe the mitigation hierarchy

- v) Loss of local open space & development of green corridor
- vi) Insufficient information provided to assess baseline ecology of site.

**Oxfordshire County Council** has responded by commenting that given that it is a non-car bridge, it doesn't seem to have any adverse impact on Oxfordshire and therefore, Oxfordshire County Council do not have any comments to make.

South Oxfordshire District Council has no comment to make on this application.

Wokingham Borough Council has no objection to the application.

Cllr. Brenda McGonigle (Park Ward) objects to the application on grounds of:

- There is no specific reference to the MRT in planning documents, so it should be refused
- It won't improve walking, access from Newtown, wheelchair users, is not necessary for cycling, modal shift and air quality improvements are false, and would harm access to open space
- There has been a lack of proper consideration of alternatives
- It would harm open space and ecological objectives for The Coal Woodland
- The scheme results in a considerable loss of amenity for Reading residents
- The scheme adversely affects the setting of listed buildings, the Brunel and Horseshoe bridge. These two heritage assets should be protected not just in their structure but in their setting
- Reading's reputation as a town with beautiful riverside will be severely affected
- Concerned that the MRT would not be just for buses in the future, so should be refused
- Some buses (e.g. the RailAir Link) would only be attracted to the route for a short period
- Considers some of the images to be misleading
- Scheme is proposed in an area of flood risk and climate change is uncertain
- The Park & Ride element of this scheme will be lit only from 7 am to 7 pm, but it is not clear if the P&R will be used as a bus interchange for passengers to leave one bus and alight another to travel further along a route out of or into Reading outside of these times
- Consultation with the local community has been poor, contrary to the view expressed in the Sustainability Statement.

**CIIr Rob White (Park Ward)** objects to the application. The claim is made by the application that the MRT will reduce congestion in East Reading, but 'congestion' is not the amount of traffic on a road, it is better defined as the point at which traffic becomes saturated, leading to slower speeds, longer trip times, and increased queueing - what the Council's application documents term 'driver delay'. Regarding traffic on London Road, the proposal would have a negligible effect with MRT only; a 'not significant effect' when combined with the P&R; and were the P&R in place and adding the MRT, again, a negligible effect. The real impact on reducing journeys is therefore considered to be the P&R and not the MRT.

The MRT will simply induce demand for traffic in the area. The application claims that any shift in usage from car to bus will be so small as to not be a factor in inducing increased demand. There will be no reduced congestion, so no 'inducement' to drive. This makes no sense and the scheme should be rejected as, using its own modelling, it does not meet its stated aims.

Classification: OFFICIAL-SENSITIVE LOC-SEN

There are people living in the Coal Wood in the area which would be destroyed when the road is built. There have been people living in this area for a number of years in tents. Concerned that this would be a violation of the human rights of the people living in the tents, in particular the right to shelter. Alternatively, if the people are simply displaced to the edge of the construction site then there may be a number of health and safety considerations that might needs to be dealt with through the planning process. Officers are aware of the long-standing rough-sleeping which occurs in this area, including in parts of the Woodland. In terms of the construction process, there are mechanisms under the Health and Safety at Work Act to protect neighbours/occupiers of sites during construction, this is not of itself a planning matter.

**RBC Sustainability Team**: MRT schemes are considered to be a sustainable transport option and therefore offer a positive impact on the environment. Specifically, they have the ability to reduce the pollution effects from combustion powered private vehicles. This is dependent on the vehicles used for the MRT and the occupancy levels but if designed correctly, they should improve local air quality and reduce the per passenger greenhouse gas emissions through diverting passengers from private car use.

It is acknowledged that the scheme in East Reading involves some habitat loss. It is important to consider this carefully and ensure that it minimised and compensated through enhancements which protect and/or improve biodiversity and also through planting in other locations as appropriate. The scheme should be assessed for its impact on and vulnerability to climatic change in relation to the natural environment and the physical design of the structure. Examples would include increased flooding, heatwave, ground instability, water storage and drainage, habitat effects.

It is also assumed that construction of the scheme will utilise reclaimed/reprocessed aggregate in order to reduce the 'embodied carbon' in the scheme, as is standard practice in RBC highways schemes. The above are some key considerations of the scheme as a whole. It is understood that the proposed amendments would improve the scheme in these respects, but comments are made without a detailed assessment of the original scheme design or the recent proposed changes.

The Reading Climate Change Partnership Board has advised that as a board, this is something they would need to be neutral on. In general, the Board is supportive of schemes which will reduce carbon emissions and promote public transport, helping Reading move towards a zero emissions future, which is important to mitigate climate change. The Board recognises, however that the scheme does have local environmental and social impacts which do concern some of the board members. It is worth noting that the impacts of the scheme on preserving the adaptation capacity of the area are important: including biodiversity corridors; flood storage capacity; access to green space; and protecting water resources.

The **RBC Access Officer** makes the following comments:

- Lighting needs to consider visually impaired people
- Paths need to have durable surfaces for all to move easily
- Cycle routes should restrict access to motorcycles/scooters, etc., but ideally allow for wheelchair and mobility scooter users and those with handcycles and wide pushchairs/buggies etc.
- Safety needs to be taken into account when shared surfaces are used, particularly with regard to visually impaired and/or deaf or older people mixing with bicycles

- Some benches with arms would be useful for some people with mobility problems using the route and could also deter skateboarding
- Bridge landings need to be as gradual as possible
- Colour contrast will be very important throughout the site for visually impaired people with regard to surfaces, street furniture, etc.

The Reading Museum Manager and the **Reading Museum and the Abbey Quarter project** team wishes to comment regarding the revised landscaping strategy for the proposed east MRT scheme.

Welcome the inclusion of storyboards/information boards within the proposals particularly the aim to 'celebrate the confluence of the Thames and Kennet', especially as this is a key location welcoming visitors into the Borough via the Thames National trail and national cycle routes, and it is also a vital link to the town centre via the Kennet & Avon canal Thames Path and cycle route. To this end we would encourage the applicant to ensure that any panels include information about the rich culture heritage of the development location and also encourage links to places that visitors can find out more about Reading's culture and heritage (including the nearby Riverside Museum and the Abbey Quarter).

The site's heritage includes the important prehistoric and Saxon archaeology highlighted by the Heritage Desk-Based Assessment and the comments from Berkshire Archaeology (many of the previous archaeology finds are on display at Reading Museum and the Riverside Museum at Blake's Lock). Transport heritage is the other key theme at this location including the previous foot ferry, the listed horseshoe bridge that replaced the ferry in 1892 and the various Victorian bridges of the Great Western Railway that are a key heritage asset of the site.

This would be consistent with the approach that RBC's Reading Abbey Revealed project has taken to promoting Reading's heritage as part of the conservation and interpretation of Reading Abbey Quarter that will be implemented in June 2018. We are happy to assist the applicant if the application is successful and the boards are implemented. We have excellent links with local community groups and schools in east Reading through our project work. We would be happy to tell the MRT team more about our upcoming interpretation scheme and how we got to this stage so that we can see how they could complement each other and support relevant overarching RBC policies.

Berkshire Archaeology advises that the applicant's assessment indicates that there is moderate potential for isolated prehistoric flint artefacts as well as limited Saxon remains in the easternmost extent of the site and further investigations are required prior to development and a conditions is advised.

**Historic England** does not wish to offer any comments and suggests that the views of the Council's specialist conservation and archaeological advisers, as relevant, are sought.

**Natural England** has confirmed they wish to make no comments on the application. Natural England has not assessed this application for impacts on protected species. The lack of comment from Natural England does not imply that there are no impacts on the natural environment, but only that the application is not likely to result in significant impacts on statutory designated nature conservation sites or landscapes.

The Berkshire Design Panel of Design South East (d:se) undertook a review of the application scheme on 6 June 2017, prior to submission of the planning application. Whilst the Panel were highly supportive of the scheme in principle, it questioned the precise route, the design of the structure itself and the ecological mitigation proposed. Key points from the Panel's report were as follows, with brief officer responses in italics.

- The Panel are highly supportive of the principle and commend Reading and Wokingham Borough Councils on working collaboratively to develop an alternative approach to traffic congestion problems in the area.
- The proposed structure currently appears too utilitarian in design and risks negatively impacting this sensitive site. *Design altered, see below*
- The way the viaduct meets the ground at either end requires further exploration, and there is a missed opportunity in not integrating the proposed cycle route more into the existing network.
- Considers that the project should present an opportunity to encourage leisure and tourism along this length of the Thames Path. A more ambitious, concept led landscape strategy that sets out a vision for how this area could be improved could contribute to this. *See mooring and benches arrangements*
- Concern for creation of a functionless covered area risks encouraging anti-social behaviour and negatively impacting this setting. However, exploiting this picturesque location and using this structure to activate the riverside with public uses has the potential to benefit the area. *This area now subject to natural measures to curb vandalism, etc.*
- Input of an architect/urban designer in the design team will be necessary to further develop the project and landscape architecture should be a more fundamental driver and better integrated into the project. *Riverbank/edge redesigned*
- Constraints such as Network Rail land and flood risk are causing limitations, but we feel these should be challenged more assertively to help make the most of this opportunity. *Dialogue undertaken post submission of application.*

Reading Friends of the Earth objects to the application:

- The applicant's evidence on air quality in 2021 shows high levels of nitrogen dioxide and particulate pollution, close to WHO target levels, both with and without the proposed scheme, so scheme's impact would be negligible. Predicted air quality along the A4 in 2021 is not good and should be improved to give greater margins below WHO target levels.
- There is no evidence presented that the scheme will have a significant beneficial effect on air quality. Therefore claimed purpose for the scheme "easing forecast ... air quality" is not achieved and the scheme is not compliant with the requirement of Policy DM19 to "have regard to the need to improve air quality and reduce the effects of poor air quality". The scheme offers no significant improvement to air quality on the A4 corridor so does not achieve its stated purpose and the scheme is not considered to be justified on the basis of improvements to air quality.
- Air quality at monitoring point'R8' in 2021 is modelled to be a little below WHO guideline levels for NO2 and PM2.5 but the WHO guidelines do not represent 'safe thresholds' for air quality and the modelling for PM2.5 has not been verified. Applicant should implement measures to reduce pollution levels everywhere to substantially below WHO guideline levels

The Canal & River Trust has confirmed that the application falls outside the notified area for its application scale. We are therefore returning this application to you as there is no requirement for you to consult us in our capacity as a Statutory Consultee.

Network Rail has been involved in the progression of this scheme and is satisfied with the latest scheme routing, which includes minor 'oversailing' of NR land. Informatives are offered.

**Reading UK CIC** Reading Business Growth and Skills Committee supports the application for infrastructure work to support the creation of the Mass Rapid Transit link in East Reading.

Regard this as a pivotal piece of infrastructure improvement to support public transport in the area, reduce reliance on car journeys and improve journey time to support business growth in Reading.

Thames Valley Park Management Ltd. strongly supports the planning application:

- The MRT will see a significant reduction in the length of time taken by the Thames Valley Park Shuttle bus to journey between Reading Centre and the Park. Currently the bus can be delayed by build-up of traffic particularly on the A4, and during peak periods. This can act as a barrier to using sustainable transport options. The dedicated route will improve the reliability of journeys which will encourage use of the bus service. Believe this will be a significant benefit to the businesses and occupiers of Thames Valley Park.
- The MRT will improve access to Thames Valley Park for pedestrians and cyclists. This will encourage individuals to make sustainable journeys to and from the Park. Readybike cycle hubs will be connected. The environment and safety of cyclists who travel between Reading Centre and Thames Valley Park will be significantly improved.
- The MRT will complement the proposed Park and Ride facility due for construction at Broken Brow to the West of Thames Valley Park.
- Journey times and reliability of other public transport using the MRT will be improved, leading to a reduction in traffic on the A4/ Kings Road, giving an associated improvement in air quality.
- It is a key infrastructure element in Reading Borough Council's and Wokingham Borough Council's Local Plan, to facilitate economic and residential growth in Reading, Wokingham and the wider area. It is a fundamental scheme of the wider sustainable transport strategy for Reading and the Thames Valley.
- The scheme supports the public transport corridor on the Reading/ Wokingham/ Bracknell corridor and in north Reading.
- The MRT supports and enables a modal shift towards sustainable transport modes.

Astrea Asset Management and Shell International Ltd. own/operate buildings within Thames Valley Park and support the application for similar reasons as Thames Valley Park Management Ltd., above.

A local Transport academic, Dr. John Walker who is the Honorary Secretary of the Road User Charging Interest Group and Visiting Senior Research Fellow, Transportation Research Group, University of Southampton, makes the following points:

- A limited road charging scheme on the A4 in East Reading at peak hours to reduce congestion, using Automatic Number Plate Recognition (ANPR), would be much cheaper than the proposed £24 Million East Reading Mass Rapid transit Scheme (MRT). The capital cost would be around £31K, with annual cost £3K and no environmental disruption or visual intrusion.
- The resulting reduction in congestion would reduce delays to buses on this stretch of their route, and improve journey time reliability, as well as reducing delays for other traffic in East Reading. A similar scheme is referred to in Saddler St in Durham which has been operational since 2003 and charges £2/day.

**Tesco Stores Ltd.** has submitted a holding objection due to the uncertainties of the application on the operation of their Napier Road superstore and its car park.

**Reading University**, who has landholding interests along part of the route, has indicated to the applicant at the pre-application stage that they support this sustainable public transport project, although would like to see direct connections between the MRT and the

Thames Path in the Kennetmouth area to allow easy access to/from Newtown. This aspect has been looked at various points in the evolution of this scheme and these were ultimately rejected due to land-take and flood compensation implications. The scheme does however include a pedestrian/cycle pedestrian link which comes into The Coal area, to connect to the Thames Path.

The Earley Environmental Group objects to this application as they believe the proposal:

- Will have a negative effect on the amenity of the Thames and the riverbank where there is well-used public access both in the long term and during the construction period.
- Will damage an area of wildlife habitat at a junction between several 'wildlife corridors' the Thames, Kennet, motorway system, and railway.
- Will not demonstrate a 'net gain for nature' as required by the National Planning Policy Framework.
- Will not succeed in reducing congestion and pollution within Reading to a sufficient extent to justify the financial and environmental costs; and
- May benefit people travelling between Reading station and places in Wokingham Borough and beyond but buses using the MRT will no longer serve existing stops within Reading so will be less convenient for some existing service users.

**Newtown GLOBE** objects to the application:

- Claims that congestion in the A4 corridor and at Cemetery Junction area will be relieved are considered to be unsubstantiated
- It is not clear that there would any demonstrable improvements to air quality in East Reading and a 'low emissions zone' would be preferable
- There is no evidence other than supposition to demonstrate that residents in new housing will a) travel to work in Reading, or b) choose to travel by bus into Reading
- Not demonstrated that the MRT would encourage car drivers to divert to public transport and the likelihood is that the MRT and the bus services which are likely to use it will not be enough to change travel habits.
- Not clear that the stated aim of transport and economic benefits to East Reading will benefit local people, strong local opposition indicates not. Even the non-technical summary for the proposed development states that benefits to local residents are merely 'moderate'.
- Considered to be a lack of justification for the scheme in the local plans. There is no explicit reference to the MRT and this therefore contradicts the current core strategy for Reading Borough and planning permission should be refused.
- We do not consider that alternative options to the MRT scheme have been adequately considered (in line with EIA methodology). See Appraisal for a discussion of alternatives.
- no guarantee that in future the MRT roadway will not be converted to allow traffic other than public transport
- There would be substantial harm to settings/views of the Listed bridges
- This is a flood risk area and areas of the MRT itself are likely to flood. Secretary of State to decide on this application if EA objection remains
- Unnecessary for pedestrian and cycle use, the Thames Path caters for this
- Unsustainable impact on The Coal Woodland and biodiversity, contrary to the Council's Open Spaces Strategy, trees are TPO protected and priority species would be adversely affected. Mitigation not sufficient.
- The proposed scheme would result in a considerable loss of amenity for East Reading residents for their informal leisure
- Concern for consultation arrangements undertaken

• Concerned that as RBC Transport is the applicant and RBC is also the Local Planning Authority, there is a conflict of interest. Lead member for Strategic Planning and Transport (SEPT) should not participate in the application's discussion. These are separate functions and not an uncommon situation. The lead member for SEPT will not take part in the discussion/decision on this Item at the Committee.

**Caversham GLOBE** considers that this development would change the current riverside ambience, lose mature trees, lower part of Kings Meadow for flood compensation and result in light pollution, noise and habitat destruction, to which the group objects. With only 277 P&R spaces it appears that the scheme is not worth the money, hardly viable and will do very little to reduce traffic congestion in East Reading. The P&R accommodates such a small number of vehicles that it will not be viable to run 10 buses an hour in peak time or 4 per hour in daytime. Also, not all users of the park and ride will actually want to get to the town centre; they may want to visit the riverside or some other destination in east Reading via Kennetside, so they will not use a bus. The green riverside and the current horseshoe bridge should remain.

Berkshire Ornithological Club is concerned for the impact of the proposal and the supporting studies undertaken.

The MRT route will destroy an attractive green area that provides a peaceful haven for wildlife and for people close to the town centre. Of particular concern is (a) the loss of tree and scrub at the east end of the route and along the route and (b) the disturbance to the Kennet mouth area and the woodland and scrub to its east.

The environmental surveys presented are grossly inadequate, for example the only bird survey covers only a small part of the area concerned and the surveyor was unable to complete it. The measures proposed to mitigate loss of biodiversity fail to address the loss of secluded scrub and woodland habitat and the likely effects of disturbance, both during construction and afterwards as a result of the increased access created, on both passerines and water birds using the area. I am aware of many species that probably breed in the area that the survey failed to record, eg Grey Wagtail (Redlist), Linnet (Redlist), Whitethroat, Lesser Whitethroat.

The Napier Road Management Company Ltd. acts on behalf of the leasehold flat owners of the Luscinia View flats, Napier Road and has a number of observations about the scheme:

- 1. There are times of the year when there is a queue of traffic from Tesco Extra all the way to the roundabout on the south side of Reading Bridge. If the MRT is to use some of the existing Napier Road including where it meets the roundabout, a) how is it going to improve traffic movement, and b) not add to such congestion?
- 2. Is there any assurance or will there be any condition attached to the planning consent should it be given, to ensure that the quoted volume of traffic i.e. a maximum number of ten (10) buses per hour, will not be increased once the scheme is completed? *No, the proposal is designed to encourage, not limit bus use*
- 3. Will the level of the road between the Network Rail buildings and Luscinia View be raised in elevation, in order to prevent flooding that regularly cuts off residents trying to reach Luscinia View and Tesco Extra?
- 4. What changes will be made to the pavements along Napier Road, between Luscinia View and Reading Bridge? Any such alterations would be designed in other phases of the East Reading MRT scheme

- 5. Luscinia View has always housed senior employees working in Thames Valley Park, and their families. Will the MRT buses stop opposite Luscinia View for these people to travel to and from TVP?
- 6. If the route means widening Napier Road such that it encroaches onto Kings Meadow, what will happen to the mature trees that line Napier Road, since we presume they are protected. *No widening proposed in this application*
- 7. Will the pylon be removed, and the electricity cables re-routed underground? *Not affected by this proposal, this is the concern of the Statutory Undertaker (sse)*
- 8. What impact will the MRT have on the recently opened Biscuit Tunnel?
- 9. What measures will be taken to kerb the existing excessive speed of motorists using Napier Road? As part of the planning process will long awaited speed reduction measures be implemented adjacent to the Luscinia View development to kerb the high speeds of many motorists using Napier Road where the recent SLOW road markings either side of the zebra crossing has made little or no difference? *Highway Authority is content with the junction layouts. Presence of new T-junction likely to reduce approaching traffic speeds*
- 10. Will the shuttle buses be diesel, hybrid or gas-powered? How will the plan ensure emissions are within limits for the residents of Luscinia View, and what monitoring will take place to ensure adherence?

Please note that on behalf of our 162 members, NRMC is not formally objecting to the plans, but feel that existing concerns of residents, as well as the potential impacts of the scheme, must be properly thought through and mitigated.

# Public consultation

The application was advertised as being for a Major development, is accompanied by an Environmental Statement and would affect a Right of Way to which Part III of the Wildlife and Countryside Act 1981(public rights of way) applies (The Thames Path).

10x site notices were erected along the route and a site notice was posted in the Reading Chronicle and this process was repeated for reconsultation material in May 2018. 184 objections have been received at the time of writing, with the majority of these received in relation to the original application submission. Nine letters in support have been received. The following is a summary of the objections received, with direct responses from officers in *italics*. Where no response is given, the issues are covered in the Appraisal section of this report.

Officers are also aware of the existence of an online petition, although this does not appear to have been presented to Council officers or Members at the time of writing.

# Environment:

- Does not comply with National policies to protect the environment in the National Planning Policy Framework (NPPF)
- The application is contrary to adopted planning policies which seek to protect the Thames environment
- The riverside is invaluable for families and dog walkers
- Concern for continued function of Thames Path cycle route
- There are currently uninterrupted views along the Thames in both directions.
- It is an area with fine trees (particularly the willows, but the hawthorns are also spectacular in May and Autumn); an area of considerable wildlife interest, with slow worms and bats observed and a wide variety of birds (most significantly sand martins

which have nested in the drains of the railway bridges despite this not being an ideal nesting site).

- It provides an invaluable green corridor for wildlife right along the Thames
- Object to the urbanisation of this area which is heavily used by residents of both Newtown and Woodley.
- The noise of initial building work and subsequent traffic may disrupt the ecosystem of the river. This would only be compounded by the disturbance if sediments and banks caused by the development of this land.
- Object to the building of a new railway because I feel it will destroy the peace and quiet around the Thames valley business park. *This is a misunderstanding*
- Flood risk must be mitigated if this goes ahead
- It is one of the few remaining open spaces locally that have some aspect of wildness remaining and is in close proximity to the nationally significant Thames Path.
- The loss of habitats and biodiversity will not be suitably compensated.
- It is not clear how many trees would be lost
- Overall environmental damage caused to Thames and environs are not outweighed by the benefits of the scheme
- Overall improvements in air quality in the area are questionable
- The buses themselves would pump out noxious gases into the faces of pedestrians and cyclists making the use of the new paths dangerous to their health *There are limited instances when buses would be passing cyclists and pedestrians, even at peak flow times*
- Broken Brow is the site of an Anglo- Saxon cemetery. An ancient wharf extended from the present day location of the Jolly Anglers pub on the Kennet to behind the Dreadnought Inn next to the proposed site. The presence of a pre-medieval settlement is suspected. Ancient artefacts have been found in the area.
- Object to loss of flora and fauna which has established over the brownfield areas of the application site. Dense scrub is valuable and habitats difficult to recreate/relocate.
- I walk along the path from the canal to the Thames often to get away from road noise and hustle and bustle. I feel the peace, that I and many others seek when walking this route will be ruined.
- Broken Brow is a valued green lung amenity in an otherwise urban district *This is the P&R site in Wokingham Borough, which already has planning permission from WBC*
- Reading is now on the list of the top twenty urban tourist destinations in the UK and the main attraction is, "...seven miles of unspoiled Thames riverside". This development will destroy the peace and solitude of the waterside and urbanise the riverside.
- Development should be implemented in accordance with the ecology strategy
- The structure will encourage rough sleeping underneath
- It will have a huge impact visually and audibly and ecologically
- This public area is used by so many people on a daily basis, both from Reading and further afield. walkers, cyclists, boaters, runners, family picnics, dog walkers
- That green space should not be used to cram more people into the town centre, it should be used for improving the social and environmental aspects of people's lives which it does wonderfully
- The MRT scheme will not support Reading's aims of enhancing its role as a town with historic and cultural associations
- There is no need for what is bound to be a monstrosity of concrete to ruin this much valued area
- The MRT will destroy a beautiful area of natural flora and fauna which is used by residents of Reading Borough and greater reading to preserve and enhance their mental health and physical health; the benefits of relaxation and exercise in a

natural environment are well known. The area of horseshoe bridge which is historic and beautiful will be destroyed.

- Must ensure that all the habitats and trees are maintained until they strictly have to be removed for works to be undertaken; and that no actions are taken to 'degrade' the local environment
- The new route cannot be accessed at Kennetmouth, which means that it will have little benefit for the residents of Newtown whose green space is being destroyed by the scheme.

The scheme will make the quality of life in Newtown significantly poorer. Newtown is home to a densely populated community of various religious and ethnic communities, including a large number of children, and the proximity of the riverside provides a crucial resource for relaxation and health, as the air quality in Newtown is adversely affected by the proximity of Cemetery junction and the A4. It will not benefit cyclists or pedestrians travelling to and from the station from Newtown as there will be no access from Kennet Mouth.

- creation of a suitable nesting habitat for the sand martins that seek to nest in the GWR bridge at Kennet Mouth.
- It would appear cramped on the riverside
- The disadvantages of losing open space in the East Reading area compounded as development in the area increases, for example as a result of intensive new developments at Cemetery Junction and the Kennet Walk areas.
- The environmental surveys presented are grossly inadequate, for example the only bird survey covers only a small part of the area concerned and the surveyor was unable to complete it.
- There would be unacceptable destruction of mature trees.
- Harm would be caused to The Coal Woodland, which is a LWS/WHS.
- An alternative would be to use the land between the Waterloo and Paddington Railway lines, where there are gas towers which are due to be decommissioned

# Traffic and transport:

- Object to the arbitrary destruction of the environment for the temporary alleviation of congestion. The solution to congestion is public transport.
- Does not agree with the claimed reduction in traffic growth anticipated by the MRT
- Freeing capacity at Cemetery Junction will be immediately taken up by further car traffic anyway
- It is claimed that the eastern corridor has reached capacity and yet planning approval was given for the Wokingham Park and Ride scheme forcing RBC to propose this woeful half-baked design. It will not reduce traffic but attempt to accommodate the increase in traffic forced by WBC.
- Traffic queues are caused by cars cutting in to left lane at last minute and pedestrian traffic light sequencing at Cemetery Junction. Suggest these could be improved (without seriously damaging riverside) by dividing the highway to prevent cut-ins and/or review of traffic signals/ pedestrian bridge at Cemetery Junction.
- Whilst there are still two lanes flowing into Reading along the A4, commuters driving into Reading town centre are very unlikely to choose to park their cars at the Park & amp; Ride; take a bus ride for a small distance into the centre; to be dropped off at a location which may not be close to their destination.
- Any very slight modal shift of drivers through that corridor to a bus (or park and ride, or walk or cycle) will be compensated (or over compensated) by the modal shift of travellers to cars when they perceive a lessening of congestion in the area.
- The proposal will simply move congestion from its current location to another; i.e. from the A4 inbound to Napier Road/ Reading Bridge causing a bottleneck as buses try to cross two lanes of traffic.

understand the single lane dimension of this bridge, a single lane means that this bridge is unlikely to ever be used by a tram system which should be planned for any kind of integrated transport in a liveable city.

- mixed use paths are accidents waiting to happen, especailly if people begin cycling! It cant possibly cost that much to add a small kerb/marker for cyclists?
- Park and Ride at Winnersh is under-used and should be extended
- It appears school-runs are one of the major causes of congestion in the area and this is very unlikely to be reduced by the park and ride scheme.
- The planned bridge is over 10 metres wide, which seems excessive for single lane traffic plus pedestrians and cyclists
- The new route is poorly connected for buses, cyclists and pedestrians. The only buses that will benefit are those that visit Reading station but don't pick up or set down passengers elsewhere in the town centre; an insignificant fraction of the network.
- Similarly, the route won't solve any cycling issues. In summer it might be usable, but the elevated part is going to be very exposed in poor weather wind being the cyclist's enemy and there are limited opportunities to get on and off it. You can't, for example, use it to join Kennetside and connect with the rest of Reading, so the few people who benefit are those travelling directly from Thames Valley Park to the town centre.
- It's of even less value to pedestrians. Firstly, the bridge does nothing to enable stepfree access over the Kennet on the Thames Path and by building on the route such a footbridge might take, pretty much rules out that ever happening.
- Secondly, a walk along the viaduct would seem attractive only to people on an A to B
  journey between Thames Valley Park and the town centre who don't mind a bit of a
  breeze, or trainspotters. It's less flexible than the alternatives, given that once
  you're on you can't get off, and it's more exposed in poor weather. The Thames Paths
  will continue to be the best walking routes in the area for commuters and for
  leisure. But much less attractive after this development.
- Now we don't consider Kennetmouth a rural paradise, but surely the minimum we can expect from our council is not to make it any worse.
- At a junction in National Cycle Routes and on the Thames Path for walkers, the erection of a new flyover immediately beside the Thames Path is insensitive and will discourage leisure use of the Thames and Kennet.
- The viaduct will crowd the Thames Thames Path near the Kennet and plunge it into shade most of the time. Its underside north-facing next to a railway embankment will be gloomy and it won't be sufficient just to screen it from view as proposed; it will have to be securely fenced against vandalism or given the housing problem around here informal residential use. Thus it will be a permanently damp, fortified enclosure of no scenic value where currently the land is open, covered in grass and bushes and gets regular sun.
- If this is 'essential infrastructure' as claimed, then will the council not go to some trouble and expense to secure a route befitting its vital role?
- Because development is based on what the council can afford and not by what is necessary and appropriate then no green space in Reading is safe.
   MRT is no state-of-the-art transport superhighway; it's a bus lane to a car park. It will reduce journey times of the shuttle bus to Thames Valley Park and with parking for 277 cars, may replace a tiny number of the 35,000 daily vehicle journeys along London Road, probably encouraging more in the process. It won't do very much else, despite optimistic references in the document to Crossrail, the Heathrow rail link and even HS2.
- TVP shuttles will operate full (maybe) in one direction and nearly empty in the other at peak times,

- The MRT would dissuade use of the present cycleway/footpath next to the Thames
- Concentrate on other measures to control traffic growth, e.g. CCTV
- Option development and analysis is inadequate in the Transport Assessment
- Options that could have been assessed but appear not to have been considered
- Will reduce bus services through Cemetery junction/Newtown
- Alternatives to the scheme should be considered such as:
  - Adding an additional level to the existing Park & Ride site at Winnersh;
  - Adding a new station at Thames Valley Park similar to that proposed at Green Park Locating the park and ride on a less sensitive piece of land within the Thames Valley Park. I.e. one that did not currently support habitat for endangered species and was not so close to the Thames Path used, which is heavily used by both local and wider populations.
  - Improving air quality through a plan to introduce a low emissions zone for Reading.
  - The potential for managing demand through the use of congestion charging.
  - Promoting smarter choices via travel plans, car sharing schemes and car clubs, plus measures that reduce the need to travel, such as video conferencing and teleworking.
- It would be cheaper and more sustainable to promote public transport solutions and improve the very poor cycle facilities in the greater Reading area.
- Prefer Bridge Option 5 shown in the DAS;
- The road will be intrusive despite landscaping promises. Once the area has been disturbed by building works it is unlikely that the precious pockets of wildlife that uses this site along the river will regenerate.
- The Plan contains no policies for the need for such a link and environmental policies should prevail.
- Reading does have a congestion and pollution problem but radical action needs to be taken to stop it. This scheme is not radical, featuring as it does a relatively tiny park and ride a drop in the bucket of cars coming in to Reading, yet it will cost us millions.
- Economic activity is less and less associated with the movement of people and more associated with the movement of ideas and transactions in a virtual environment
- Implausible as claimed in the summary that the development can 'increase biodiversity and species diversity' as claimed (bullet 8), or that it will encourage 'interest within the River Corridor' (bullet 9). Will people prefer walking alongside a road, rather than a wild flower meadow, as currently? The loss of an extensive area of dense scrub to the park;
- Construction work will no doubt disrupt and destroy wildlife and peoples routes over the rivers for walkers and cyclists.
- Park and ride car park will significantly degrade biodiversity. The road itself severs the riverside environment from the railway embankment.
- It is mentioned that the route will be used by the Rail Air Buses to Heathrow. Will not this be a very short-term benefit? Surely once the Western Rail Access to Heathrow is completed, the need for these buses will cease.
- Will not be accessible at Kennet Mouth so no benefit to local residents;
- Object to the route could cross the Kennetmouth between the two bridges over the Kennet and keep away from the Thames side
- The proposed development is being over-taken by events. We are moving towards an environment of driver-less electric vehicles, and easily implemented systems of road pricing, that will enable city authorities to price road space to achieve optimum traffic flows across the 24 hours of each day. The damage resulting from this scheme to the sensitive environment of the Thames and Kennet Mouth would be permanent.

- Why does Reading want to continually grow and attract these people to work in Reading when it has such a detrimental effect on those who already live here?
- This is a scheme which causes a lot of environmental damage, costs money and all for the sake of shipping in a comparatively small number of drivers (probably commuters whose cars will occupy the TVP car park all day) The same number of P&R ride places could easily be added at Winnersh;
- The scheme encourages rather than discourages car use;
- The Transport Assessment modelling is based on inadequate sampling and unsupported assumptions.
- Validation in line with Department for Transport Guidance for modelling Park and Ride has not been carried out.
- Based on figures in the Transport Assessment there would be an additional 10 minutes added to Park and Ride customer's journey time each day. For this they would achieve a saving of 65p each day based on a quarterly season ticket at the Queens Road car park. This is not likely to prove to be attractive to many customers.
- We need this space: future generations need it. Wildlife needs it.
- another example of Reading Borough's Anti-Car policy. Will not reduce congestion and will cost me, the taxpayer. If Reading Council want to reduce congestion let councillors give up their parking spaces in the Hexagon
- The park and ride car park is aimed at hose who work in Reading but the TVP bus service will not pick up from the Park and Ride site after noon. As a result there is no possibility of the proposal having any impact.
- P&R car park not big enough to be of use
- If this is a sustainable solution, why would motorcycles not be permitted. *Motorcycles are private motorised vehicles*
- Without a bridge over the Thames at this point it also makes little sense.
- Good enough public transport in Wokingham and Winnersh anyway, this will not lure people out of cars;
- Not seen any reference to the issue of the safety of locating the proposed MRT so close to many existing electrical power cables, or to the method and costing of relocating them to give space for the proposed bridge and flyover at Kennetmouth
- There is no guarantee that the fast track would not be changed in the future to a full road. *The use of the proposal will be controlled via a legal obligation*

# Procedural

- HM Treasuries Green Book principles are breached by omitting a cost benefit analysis Not a material consideration to this planning application
- Application has not considered the trend towards home working and the 'do nothing[RK1]' option
- The Council should have re-appropriated the land under Section 122 of the Local Government Act *This is not a planning matter*
- The Council has erred in law by not acquiring land outside of their control in order to provide the MRT *This is not a planning matter*
- Original consultation carried out in school holidays Responses to this application have been able to have been submitted since July 2017
- Social impact on Newtown residents not fully assessed
- Since the demise of the Cross town route, assumed that this area was safe from development
- I do not believe that Reading Borough Council would grant planning permission to a private developer who proposed to construct a scheme with the equivalent level of impact, and I would like to record my concerns about the conflict of interest which

exists with the Council acting as both developer and planning authority for the scheme.

- Concerned about the transparency of the decision making process as the proposal is put forward by RBC who are one of the two approval bodies. Considers that this proposal has significant implications for the regional transport [RK2]policy and should be taken to a national level for a decision. At the time of writing, this application would need to be referred to the Secretary of State in the case that the EA does not remove their objection to the application, in which case, the Secretary of State would then have the opportunity to 'call in' the application for his determination, should he wish to do so.
- Shocked that project has reached the application stage.

# Applicant's public consultation

Pre-application meetings with RBC and WBC were held in May 2016, July 2016 and November 2016. Public exhibitions were held in July 2016 at an early stage of preparation of the proposals, and in July 2017 prior to the submission of the planning application.

# 5. RELEVANT POLICY AND GUIDANCE

5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise. Material considerations include relevant policies in the National Planning Policy framework (NPPF) - among them the 'presumption in favour of sustainable development'.

# 5.2 <u>National Planning Policy Framework (NPPF) (March 2012)</u>

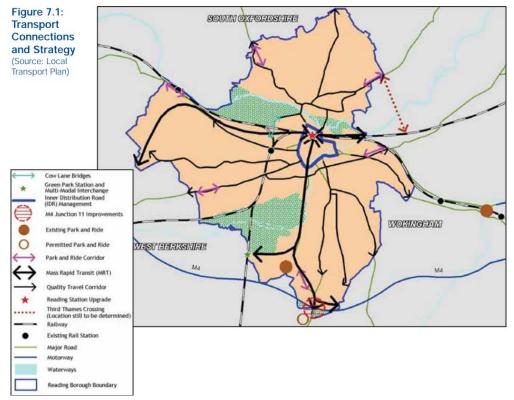
The following NPPF chapters are relevant:

- 1. Building a strong, competitive economy
- 2. Ensuring the vitality of town centres
- 4. Promoting sustainable transport
- 7. Requiring good design
- 8. Promoting healthy communities
- 10. Meeting the challenge of climate change, flooding and coastal change
- 11. Conserving and enhancing the natural environment
- 12. Conserving and enhancing the historic environment
- 13. Facilitating the sustainable use of materials
- 5.3 <u>Reading Borough Local Development Framework: Core Strategy (January 2008) (as</u> <u>altered 2015)</u>
- CS1 (Sustainable Construction and Design)
- CS2 (Waste Minimisation)
- CS3 (Social Inclusion and Diversity)
- CS4 (Accessibility and the Intensity of Development)
- CS5 (Inclusive Access)
- CS7 (Design and the Public Realm)
- CS8 (Waterspaces)
- CS9 (Infrastructure, Services, Resources and Amenities)
- CS13 (Impact of Employment Development)
- CS20 (Implementation of The Reading Transport Strategy

- CS21 (Major Transport Projects)
- CS22 (Transport Assessments)
- CS23 (Sustainable Travel and Travel Plans)
- CS24 (Car/Cycle Parking)
- CS28 (Loss of Open Space)
- CS30 (Access to Open Space)
- CS33 (Protection and Enhancement of the Historic Environment)
- CS34 (Pollution and Water Resources)
- CS35 (Flooding)
- CS36 (Biodiversity and Geology)
- CS37 (Major Landscape Features and Strategic Open Space)
- CS38 (Trees, Hedges and Woodlands)
- 5.4 <u>Reading Borough Local Development Framework: Reading Central Area Action Plan</u> (RCAAP) (2009)

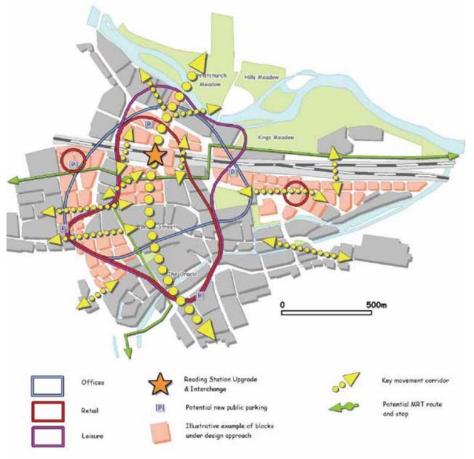
Vision and Key Principles (p.14)

- RC1 (Development in the Station/River Major Opportunity Area)
- RC3 (Development in the East Side Major Opportunity Area)
- RC5 (Design in the Centre)
- RC7 (Leisure, Culture and Tourism in the Centre)
- RC14 (Public Realm) including RC14d (Kings Meadow & Coal Woodland)



RBC Local Development Framework, Core Strategy (Page 64)

Reading Borough LDF Core Strategy, Figure 7.1 Transport Connections and Strategy, P.64



RCAAP fig 5.2 Spatial and Design Strategy for the Centre of Reading (Page 18)

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# 5.5 <u>Reading Borough Local Development Framework: Sites and Detailed Policies</u> <u>Document (2012) (as altered 2015)</u>

- SD1 (Presumption in Favour of Sustainable Development)
- DM1 (Adaptation to Climate Change)
- DM3 (Infrastructure Planning)
- DM4 (Safeguarding Amenity)
- DM12 (Access, Traffic and Highway-Related Matters)
- DM15 (Protection of Leisure Facilities and Public Houses)
- DM16 (Provision of Open Space)
- DM17 (Green Network)
- DM18 (Tree Planting)
- DM19 (Air Quality)
- SA11 (Settlement Boundary)
- SA14 (Cycle Routes)
- SA16 (Public and Strategic Open Space)
- SA17 (Major Landscape Features): The Thames Valley
- 5.6 Pre-Submission Draft: Reading Borough Local Plan

The Council is preparing a new local plan (to cover the period up to 2036), which in time will supersede the present suite of Local Development Framework (LDF) documents. The

Submission Draft version of the Local Plan has been submitted to the Secretary of State for consideration, therefore the draft policies therein are considered to be relevant for development control purposes. However, members are advised that the Government has not advised on the weight which can be attached to any such emerging documents and officers advise that the adopted policies of the Core Strategy and the Sites and Detailed Policies Document shall continue to function as the Development Plan for the purposes of Section 38(6) of the Planning Act. Officers advise that the new Local Plan continues (rolls forward) many of the themes of the current LDF documents, but that little weight can be attached to it at this time.

# 5.7 <u>Supplementary Planning Documents</u>

Sustainable Design and Construction (July 2011) Revised Parking Standards and Design (October 2011) Employment, Skills and Training (April 2013) Planning Obligations under S.106 (April 2015)

Other Reading Borough Council Corporate documents Corporate Plan 2016-19 Building a Better Reading Reading Open Spaces Strategy (2007) Reading Tree Strategy (2010) Local Transport Plan 3

Other documents relevant Thames Valley Berkshire: Delivering national growth, locally Strategic Economic Plan, 2015/16 - 2020/21 Design Manual for Roads and Bridges (DMRB) Wokingham Borough Council Local Development Framework (LDF) documents: WBC Core Strategy (2010) Managing Development Delivery Local Plan (2014)

## 6. APPRAISAL

- 6.1 This is a complicated proposal with wide-ranging issues, but officers consider that these are best discussed in terms of the following:
  - (a) Principle of the development and relevant planning policy
  - (b) Overview of environmental value and policies for the protection of this area
  - (c) Harm caused to the environment and design response
  - (d) Other environmental effects
  - (e) Transport technical matters
  - (f) Implementation

# (a) Principle of the development and relevant planning policy

## Overview of planning policy and the location of the proposed MRT scheme

6.2 The policy aspiration for seeking this major transport infrastructure project in the East Reading area has been identified for a number of years, with the approximate route identified in previous adopted Structure Plans and Local Transport Plans (LTPs). These protections have primarily sought to forward-plan for sustainably managing the predicted increase in travel demand from extended residential

developments along the A329(M) corridor (Winnersh, North Wokingham and Binfield/Warfield (North Bracknell). Significant residential and other development allocations in subsequent and emerging local plans have confirmed significant growth in these areas and thereby only increased the necessity of such a sustainable transport arrangement. However, over time, the detailed nature of the design solution has formed and is essentially the planning application before this Committee and that which is to be shortly also to be reported to Wokingham Borough's Planning Committee.

- 6.3 At national planning policy level, the NPPF is concerned for balancing the needs of development and sustainable transport and this proposal includes elements to which large parts of the NPPF are relevant. Firstly, the beginning of the NPPF sets out what 'sustainable development' means in the English Planning System. There are three tenets to sustainable development: an economic role; a social role and an environmental role. There are part of the statement of intent in the NPPF:
  - 6. The purpose of the planning system is to contribute to the achievement of sustainable development. The policies in paragraphs 18 to 219, taken as a whole, constitute the Government's view of what sustainable development in England means in practice for the planning system.
  - 7. There are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles:
    - an economic role contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;
    - a social role supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and
    - an environmental role contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

NPPF 2012, p. 3

6.4 Sustainable development is thus not simply about protecting the environment: it is development which plans for and supports economic delivery including providing necessary infrastructure; it must provide a balance in meeting all economic and social needs; and it must protect and enhance the natural environment and importantly, this has to include pro-actively tackling climate change and reducing carbon emissions. It is clear, then, that as a major strategic transport infrastructure project, the East Reading MRT is potentially capable of positively meeting all of these aims.

#### Planning policies supporting the purpose and location of the MRT

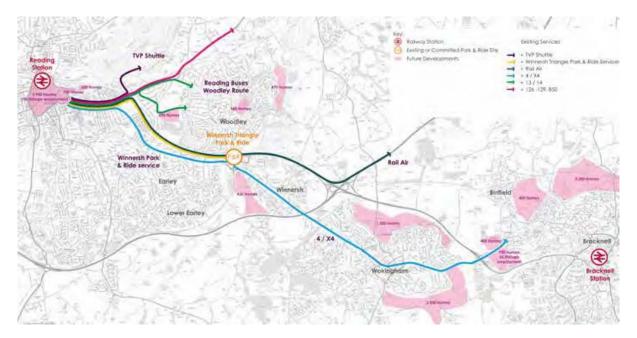
6.5 This application is being promoted by both RBC, working with WBC and Thames Valley Berkshire Local Enterprise Partnership (TVB LEP), as it will help to deal with future traffic growth including that arising from future new development in the Thames Valley area, help to relieve forecast congestion and improve air quality along the A4 corridor and will improve economic efficiency through reducing journey times. The scheme is a long established element of RBC's strategy to deliver economic growth and housing for Reading and has been included in RBC's three Local Transport Plans and LDF Planning Core Strategy and Action Plan. The scheme is also an identified priority in WBC's adopted Core Strategy; Managing Development Delivery Local Plan, and their Local Transport Plan.

## National Planning Policy Framework (NPPF)

- 6.6 The NPPF Chapter 1 is concerned with maintaining the economy. Reading is recognised as 'the capital of the Thames Valley' and it is vital for the continued success of the regional economy that movement of people and business is carried out in an efficient and sustainable manner and this includes commuting between central Reading, business parks and the wider towns and suburbs. Current and future congestion levels will put a serious constraint on the ability of the local economic area to flourish and the CIC and Thames Valley Park and its occupants consider the MRT scheme to be an essential and important component part of maintaining and improving regional competitive advantage for the Thames Valley sub-region.
- 6.7 The NPPF is also concerned for maintaining the vitality of town centres and with the rise of internet shopping, town centres are suffering. Customers must be attracted back to town centres by various means if they are to survive and this includes diversification of the retail/leisure offer, but also improving ease of access to the centre.
- 6.8 The NPPF seeks to promote sustainable transport and Chapter 4 seeks better balancing to allow a choice of means of travel, which frequently means supporting proposals which intend to shift the balance in favour of non-car modes. Paragraph 30 encourages developments which limit emissions and cut congestion. Paragraph 31 advises working for strategical solutions across local authority areas for, 'viable infrastructure necessary to support sustainable development'.

## Regional/sub-regional

- 6.9 The scheme is being promoted and part funded by the Thames Valley Berkshire Local Enterprise Partnership (TVB LEP). Large-scale infrastructure projects are identified in the LEP's Strategic Economic Plan and Reading – East MRT is identified as a committed project under the section, 'Enhancing Urban Connectivity'.
- 6.10 As well as a transport project, for Reading, the project is also a core aim within the Council's Corporate Plan, which has a service priority of 'Providing infrastructure to support the economy' and this includes, '....to continue and seek funding opportunities for transport infrastructure projects such as Southern MRT, Eastern MRT, P&R, National Cycle Network'.



Eastern Corridor diagram, source: applicant's DAS

- 6.11 Policies CS20 and 21 of the Core Strategy set out the major challenges envisaged in the plan period and the importance of several key pieces of transport infrastructure which are required to ensure that the Borough and Greater Reading develop in as sustainable manner as possible. CS20 is the general policy which seeks a balanced transport network and this means promoting and facilitating modes as alternatives to the private car. Policy CS21: Major Transport Projects recognises that as a regional transport hub, priority will be given to the implementation of the priority transport projects identified in the Local Transport Plan, particularly the upgrading of Reading Station Interchange, Park and Ride Sites, Mass Rapid Transit, road improvements, Quality Bus Routes and associated transport improvements. Land needed for the implementation of priority transport projects will be safeguarded from development, to enable their future provision.
- 6.12 The above indicates that there is strong support in adopted planning policy and other policies (including the policies of the adjacent Authorities) for the inclusion and siting of the MRT scheme. This is considered to be a significant factor in the planning balance of the scheme.
- 6.13 The Reading Central Area Action Plan (RCAAP) was adopted in 2009, in response to the need to guide and coordinate development pressures in Reading town centre and this includes the related infrastructure needed to support that development ambition. Figure 2.1 (reproduced below) sets out the three MRT routes, including the East Reading MRT heading due East in the general route now proposed by the current planning application.



RCAAP Fig 2.1 Transport in the Centre of Reading

#### Need for the East Reading MRT

- 6.14 Mass Rapid Transit in the Reading area is essentially a series of dedicated, prioritised public transport infrastructure projects, designed to promote and give competitive advantage to public transport in areas of the town where unconstrained private car transport is now causing unacceptable congestion levels, air pollution and economic harm. This will be bus services on partially exclusive lanes/routes and where such routes meet a road junction, the MRT will tend to have priority over other traffic to ensure the smoother and quicker flow of the MRT over private vehicles.
- 6.15 The East Reading MRT differs from the other two MRT projects in the Borough in that it takes in third party land and not public highway. Other lengths of this MRT (along Napier Road and Vastern Road) can be put in place largely using existing roads and verges.
- 6.16 The route is located on the eastern perimeter of Reading, approximately 1.4 km from the Town Centre, 1 km to the east of the mainline railway station and within commuting distance of London (68 km to the west). The route runs alongside an existing transport corridor accommodating the Great Western mainline as well as utilities infrastructure (overhead pylons, underground electricity cables and gas holders) and commercial development (e.g. the Tesco superstore and Thames Valley Park) and Reading University Land.
- 6.17 The applicant has secured the necessary funding from the Local Enterprise Partnership, who supports the applicant's business case for the proposal. Greater Reading has a population of some 230,000 people which is growing rapidly along with development in adjoining areas (e.g. Bracknell).
- 6.18 Bus use in Reading has increased since 2010 by 24% against a back drop of national decline (-2% across England and 6% in South East). Continued investment and improvement in bus services and infrastructure are essential to continue this trend and the ERMRT scheme will further improve the situation for bus use in Reading and Wokingham Boroughs and support connectivity for large urban brownfield redevelopments in Reading, for instance within RCAAP Policy areas RC1 (town centre) and RC3 (Kenavon Drive area). If this investment is not made then public transport will become less attractive, resulting in more car trips and the subsequent congestion and air quality issues.
- 6.19 Public transport currently is and will be in the future, 'demand-based' and is at the discretion of the bus operating companies who will refine services by reacting to demand over time. The London Road corridor is and will continue to be highly demanded along the route and it is therefore not the proposal to remove any routes serving this corridor where there is a demand. The Council has been in contact with bus companies throughout the development of the East MRT scheme and it has been confirmed that services using the East MRT scheme will mostly be express variations of existing services, services currently not stopping along London Road and that it is their intention to still provide a significant level of bus service on the London Road corridor, including at Cemetery Junction, when the East MRT scheme is in place.
- 6.20 It is anticipated that the future provision of buses serving East Reading and beyond will be considerably greater with the MRT scheme in place than the current level of service, given the significant levels of development proposed in Reading town centre and Wokingham Borough, and the considerable journey time savings

provided by the MRT route which will enable operators to provide more frequent services on any route without incurring additional operating costs.

- 6.21 The application proposes that the MRT will relieve the forecast increase in travel demand and the Reading Transport Model has been used to understand the potential traffic impacts the East MRT Scheme may have on the local highway network surrounding the site. Traffic flows for the following scenarios were used:
  - Baseline Existing highway network with traffic growth to 2021 and committed developments plus TVP P&R
  - Proposed Scheme Existing highway network with traffic growth to 2021 and committed developments plus TVP Park and Ride and East MRT Scheme.
- 6.22 As a check, the Business Case for the MRT scheme in the LEP also considers the 'do nothing' option, which advises that, "If nothing is done, congestion on the network would continue to increase and no further growth can be accommodated including planned growth for the local and wider area. This would seriously restrict economic growth and there is a risk that existing businesses would consider relocating out of the TVB area and possibly elsewhere in Europe." The assessments are all compared against the baseline situation.
- 6.23 Some objectors to the scheme are for the impartiality which must be exercised when the Council is the applicant. Your officers including RBC Transport Strategy are independent of the applicant (Reading Transport) and studies have been robustly assessed at each stage of this application. This has included reference to feedback from objectors, which has been welcomed. The paragraphs below are therefore the response of RBC Transport Strategy in verifying some of the applicant's stated advantages of the Scheme, with officer comments, as necessary.
- 6.24 It has been stated that the scheme results in traffic reduction of between 1% and 3% in peak hour traffic flow relative to current traffic flows across some of the eastern area roads. The modelling demonstrates that the scheme would release traffic constrained in entering the network, ease forecast congestion including that resulting from future significant growth and reduce rat-running. The Highway Authority accepts the methodology which supports this.
- 6.25 Subsequent information arising from the modelling that was undertaken to inform the Business Case to the LEP provides a 'conservative assessment' of the benefits for the preparation of a robust Business Case. Transport Strategy agrees that it is expected that the East Reading MRT will attract a greater level of patronage than has been tested, particularly in relation to providing access to the future Crossrail services. Whilst the business case has accounted for a range of bus operators, further routes are expected to be attracted to the route, principally because of the reduced journeying times available to access the town centre.
- 6.26 There is a core of bus services which the applicant has identified which would use the MRT 'immediately' on its opening, such as the TVP Shuttle, various services to Woodley and the RailAir Link and other services which run along eastern routes. However, the applicant considers that there are other services who would seek to gain from using the MRT because their destination is Central Reading and all such services are generally hampered by the lack of capacity in the A4/Cemetery Junction area and the productivity of such services would be improved by direct access to the station.

#### Longer term

- 6.27 The second major area of the scheme's advantage would be its wider, strategic benefits and these would be related to gains over the longer-term. The proposal would make the bus route more direct for services that serve areas outside of the Reading Borough boundary. The route will also be used to serve new residential developments located outside of the Borough for those people wanting to travel into Reading to either work or gain access to Reading Railway Station. The applicant anticipates that the East Reading MRT will provide a catalyst for the delivery of further Park & Ride schemes, attract bus operators to offer fast track bus services along the A3290/A329(M) and enable further phases of the wider planned MRT network. Officers accept that this is a positive aim, but this is more difficult to concur with, as there are various complicated factors at work here, not least the individual investment decisions of other bus operators and other sites/developments which would be required, outside the control of this council.
- Following requests for further information in the form of outputs from the Reading 6.28 Transport Model (RTM), the additional responses confirm the difference in flows for the AM and PM peak hours and illustrates that traffic flows are forecast to reduce on the residential streets in the east side of Reading, such as Erleigh Road, Crescent Road, Culver Lane and Whiteknights Road; with an increase in traffic on London Road in the AM Peak and some reductions in the PM Peak between Cemetery Junction and the A239M. It is also acknowledged that reductions in both directions occur on the IDR between the Watlington Street Gyratory and the Forbury Road/Vastern Road Roundabout. RBC Transport Strategy considers that these reductions are likely to be as a result of people switching to use the bus/MRT into Reading with the introduction of the East MRT scheme. The shift to bus/MRT will allow people currently 'rat-running' along residential streets, travelling from the east side of Reading to the town centre, to shift back onto the A4 (a main radial route into Reading). Some reductions are also shown in central Reading on Forbury Road and Kings Road in the AM peak hour. This is likely to be as a result of people switching their mode of travel into Reading from private car to bus as a direct result of the introduction of the East MRT scheme.
- 6.29 The reductions in car travel along the residential streets will also make the commuting experience of the residents in those areas more pleasant. It is hoped that this may even encourage them to use alternative modes of travel i.e. walking and cycling, given the reduced congestion along these routes. Transport Strategy is satisfied that the assessment undertaken is robust. The assessments of nearby road junctions have identified that the proposals would have a minimal impact on these junctions and therefore are deemed acceptable.
- 6.30 Several commentators remark that not enough is being done by the Council to alleviate traffic congestion in the Cemetery Junction area and more could be done with the existing road infrastructure to limit car journeys. Road congestion charging and zonal controls are suggested. One of the severe issues in the Cemetery Junction area is of road width and the Highway Authority advises that there are comparatively limited opportunities to free up traffic flow in this area and hence, the planning of a separate route and in this case one that is quicker and is exclusively for sustainable transport modes will allow high-speed bypassing of congestion in the A4/Cemetery Junction area. Some objectors suggest that helping traffic flow at these congestion bottlenecks is pointless, because as soon as capacity is provided on the network, that capacity is immediately used up. This theory is not proven and as the Highway Authority agrees, the more space is

perceived on the existing network, the more cyclists, etc. may be encouraged back to the roads. Some objectors are concerned that existing bus services in Newtown would be adversely affected and therefore have a negative social effect on the Newtown area in particular, but the applicant advises that no services in the Newtown area are planned to be reduced, although this decision is ultimately for the bus operator. It should also be noted that promotion of bus use is sociallyinclusive, therefore fulfils social goals.

#### Pedestrians and cyclists

- At present, pedestrians and cyclists use the Thames Path, which is generally a 6.31 gravelled surface and allows for commuting and recreational travel in this pleasant riverside environment. In periods of heavy/continuous rain, there have been known to be flooded areas where the path has become impossible to use at certain points. The applicant considers that the proposal will also provide a more reliable route into the town centre, avoid the areas at risk of flooding, improves the lighting and surfacing along the route, and removes the requirement for cyclists to dismount especially at the horseshoe bridge. The Highway Authority agrees that all of the above will help encourage the use of alternative modes. The applicant has produced an assessment of the pedestrian/cyclist movements along the existing Thames Path to identify its current use. The survey data included at Appendix A of the Transport Statement provided the numerical information with the schematic diagram demonstrating the locations of these surveys subsequently provided. The surveys identify that the Thames Path NCN is currently very well used in all directions.
- Officers consider that the immediate advantages provided for pedestrians and 6.32 cyclists are less obvious than the advantages for public transport, for the shortterm at least. For cyclists, there may be an upsurge in longer cycle commuting from the Woodley and Winnersh areas, as the least attractive/safe part of the route into town (Cemetery junction) would be by-passed, but it may take longer for the less committed cyclist to be persuaded. The gradient up to and over the bridge would be smooth and gradual and this slope should not dissuade a cyclist who is prepared to travel several miles in to town. Advantages for the average pedestrian would appear to be comparatively limited and officers cannot see the route being particularly attractive except for those who wish to have a more commanding view of the river, or longer-distance commuter runners/joggers and with the advent of better changing and locker situations at workplaces, this is a small but nevertheless increasingly more popular travel mode. Nevertheless, the fact that almost half of the usable width of the carriageway/footpath-cycleway is to be used for pedestrians and cycles is further indication of this proposal looking to cater for further increases in future sustainable travel. The applicant also considers that this aspect of the proposal will allow easier sustainable commuting opportunities from Central Reading to the TVP and Suttons Business Parks.
- 6.33 Some objectors are concerned that use and enjoyment of the Thames Path for recreational use would diminish as a result of the scheme. Officers consider that in reality, use may drop, but only to the extent that some (but not all) of the commuter runners and cyclists would switch to the MRT in preference. Those undertaking shorter journeys at least may not divert.

## Alternatives considered

6.34 Various commentators are concerned that the impact this proposal would have is

excessive in terms of localised environmental harm and that other less harmful options have been either dismissed or not considered.

6.35 The DAS includes a High-Level Options Appraisal and other options have been mentioned as well. Whilst it is not the purpose of the application's assessment to detail all other potential options, consideration of alternative this is a matter for the EIA process. The table sets out a brief response to the various options which have been proposed.

Alternative to consider	Officer response
MRT route should cross Kennetmouth further south and run along the gasholders land, which is surplus to requirements	This land is not known to be available. Suttons Business Park is a core employment area in the Wokingham Local Plan so B uses would be encouraged/protected and issues of connecting to the road network in this area considered to make this option unviable.
Construction of a dedicated bus lane along the A4 from Cemetery Junction to the A3920.	Highway Authority advises that there is not the road width available to accommodate this.
Construction of a tidal flow bus lane in the central or Southern lanes of the A4 between Cemetery Junction and the A3290.	Although tidal flow bus lanes would aid the flow in one direction buses would still be required to make return journeys within the congested traffic and as such would contribute very limited benefit in journey times and reliability. There is not a tidal flow of traffic along this section of the A4 London Road with queues occurring in both directions in the AM and PM peaks. Also safety and capacity concerns over vehicles turning right into and out of the Newtown area as they would be required to
Improved parking facilities at Twyford and Maidenhead to allow park and rail travel in Reading from the catchment area to the East.	cross two lanes of traffic. Likely to be issues of Green Belt. Such pressures may in future occur with the attractiveness of the MRT. Does not precludethis Rail and bus often serve differnet journey s
Expansion of the Winnersh park and ride scheme.	Such pressures may in future occur with the attractiveness of the MRT P&R must connect to the MRT to produce seamless modal shift
A mass rapid transit scheme along the proposed route with underground tunnelling to mitigate impacts in the most sensitive locations. A workplace parking levy in Reading, with	Not viable, unlikely to receive funding support from the LEP, given value for money constraints of this versus other transport infrastructure projects This would be required to work alongside
revenue diverted back into public transport provision. A congestion charging zone in Reading, with CCTV and revenue diverted back into public transport provision.	the proposal not instead of it. Need to offer attractive alternatives This would be required to work alongside the proposal not instead of it.

Planning and economic policies which	Already happening, but not sufficient of
encourage increased working from home and alternative workplaces to Reading town centre.	themselves to stem rising congestion

- 6.36 Some commentators, for example Newtown GLOBE, are concerned that public consultation has not taken place with local residents over the viability of such options, or their preferences in terms of the option selected. The above table should indicate why the applicant has taken this option forward and furthermore, this is in accordance with relevant planning policy which seeks to protect a route for and provide essentially, the MRT, in this location.
- 6.37 In summary, whilst there may well be alternatives, they are considered to be either unworkable or insufficient on their own. Officers therefore consider that the case for the East Reading MRT is strong and accepted in principle.
- 6.38 At the local level, this is an area of valued countryside/urban fringe with a prominent river frontage. The route itself is of acknowledged environmental importance, being comprised of areas of self-seeded scrubland, woodland which is a Wildlife Heritage Site that contains Priority Species, the Kennetmouth (significant historically for the development and purpose of the founding of the town) and the southern riverbank of the River Thames. The proposal would have some significant and at times, detrimental impact on various areas and it is the purpose of this report to evaluate these and to decide whether the balance to recommend approval has been proven.

#### (b) Overview of environmental value and policies for protection of this area

- 6.39 The proposed route of the MRT is largely publicly accessible and is a well-used 'green wedge' or 'green lung' which extends into and out of the Eastern area of the town centre. This part of the Borough is clearly valuable in many ways: its openness, its sense of rurality and tranquil enjoyment, its sense of space, and as a place to picnic, cycle and walk. Accordingly, various planning policies exist to protect this area.
- 6.40 The Thames Valley is defined as a Major Landscape Feature on the Development Plan Proposals Map. The aim of this policy is to define the boundaries of Major Landscape Features to allow Policy CS37 of the Core Strategy to be applied. This contributes to core objective 4 of the Core Strategy, in that it maintains the natural environment of the Borough. Important areas of Public and Strategic Open Space are protected by Policy SA16, as shown on the Proposals Map and these will be protected from development. Proposals that would result in the loss of any of these areas of open space, or jeopardise their use or enjoyment by the public, will not be permitted. Policy DM17 identifies green links and green networks. Green Links shall be maintained, protected, consolidated, extended and enhanced. New development shall demonstrate how the location and type of open space, landscaping and water features provided within a scheme have been arranged such that they maintain or link into the existing Green Network and contribute to its consolidation. Policy DM18 assists this by requiring new mitigating tree planting in developments.
- 6.41 Policy CS28: Loss of Open Space seeks to restrict applications which would result in the loss of open space or harm enjoyment of open space, unless there are special

circumstances and the quality of the open space should not be harmed. The harm to the open space's function in this case would not generally be through physical loss of the open space (except for a reduction in the area of The Coal), but more related to the riverside area's usability, overbearing/overshadowing impacts and the overall ability of the space to continue to be of benefit to the public. Policy CS8: Waterspaces seeks to protect Reading's waterspaces for ecological, riverside character and river-related recreation.

- 6.42 The area also forms part of green network/green link, extending from the town centre, along the route of the Thames, into the countryside towards Sonning, to the East. DM17: Green Network aims to protect Reading's existing Green Network, and for the enhancement and extension of that network. Policy CS36: Biodiversity and Geology states that Wildlife Heritage Sites will be safeguarded and where possible, enhanced. Permission will not be normally be granted for any development that would adversely affect a designated nature reserve or Wildlife Heritage Site. Policy CS38 seeks to resist the loss of trees or landscaping and this includes individual trees, hedges or woodland areas. In terms of controlling development, policies RC5, RC14 and CS7 and CS8 and RC7 in summary require that the nature of development proposals in the riverside environs must be sensitive to the purposes of the principal function of the Thames (recreational, tourism) and be sympathetic to its character.
- 6.43 In summary, the above principal policies provide strong policy protection and tests which would need to be satisfied for this development to be supportable. Further, paragraph 118 of the NPPF states that when determining planning applications, local planning authorities should aim to conserve and enhance biodiversity by applying the following principles: if significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused.
- 6.44 Clearly, the application raises conflict with a range of environmental policies: those concerned with visual amenity, landscaping/ecology and open space. The next section of this report provides commentary on the major impacts of the scheme and the work which has been on-going to address these issues since the submission of the application in July 2017.

# (c) Harm caused to the environment and design response

- 6.45 There are very strong and valid arguments/objections to the scheme and it is accepted that there will be identified localised harm caused in a number of localised areas. The application has undergone various rounds of options testing and scheme refinement since its original submission and this has culminated in the comprehensive series of changes which were eventually finalised in the documents which were submitted to the Local Planning Authority at the end of April and consulted on during May 2018. These options have included not just the scheme itself but also options for environmental and ecological mitigation.
- 6.46 Importantly, there is now agreement between the Council's Leisure and Recreation service and the applicant for a strategy for ecological enhancements/management. These works/maintenance measures would be carried out by Leisure and Recreation and fall into four main strands (see plan at the end of this report). Such measures will include:

-Installation and/ or improvement of native and species-rich habitat types on site

and within the wider Coal, Kennetmouth and Kings Meadow East LWS; -Installation of a naturalised river edge to the River Thames, east of the River Kennet;

-Management of habitats contained within The Coal, Kennetmouth and Kings Meadow East LWS (both on and off site);

-Planting of four trees within King's Meadow;

-Improved management within the belt of vegetation at the north of King's Meadow and the belt of vegetation at the south of Hill's Meadow; and

-Inclusion of species specific measures; for example: bird and bat boxes; and deadwood habitat and rubble piles for use by reptiles, amphibians and invertebrates.

- 6.47 On the basis of the above Strategy, a Landscape and Ecology Maintenance and Management Plan (LEMMP) will be produced. The purpose of the LEMMP will be to set out the details of specific management and maintenance operations, including timing associated with habitats and species and measures to be implemented as a part of the proposed development and once the proposed development is operational.
- 6.48 The section below intends to cover the on-site areas in turn, discussing the scheme from West (Reading centre) to East (TVP) and then discuss the 'off-site' areas. From West to East, the route would is discussed in terms of three sections, from west to east.

### Napier Road and area to the South of the Tesco Superstore

- 6.49 The route meets Napier Road at a T-junction, where the traffic to the superstore maintains priority. There is a pedestrian/cycle crossing in this area and a footpath link to a bus stop on Napier Road. The route then runs through a combination of the store's landscaped car park and access roads and part of the land to the south, which is self-seeded scrub over gravel, near to the Network Rail land to the south.
- 6.50 There is some low-level wildlife habitat sensitivity in this area but its interest in ecological terms is lower than other parts of the route. The route runs between the railway line and the superstore and this is not functional open space. The route alignment to the south of Tesco (removing 30 car parking spaces and necessitating road realignments) and west of the River Kennet has been amended as a result of the proposed high-voltage sse cable underground diversion and the removal of overhead pylons. This will allow the route alignment to move further south away from Tesco and The Coal woodland, thereby reducing potential impacts upon local biodiversity and trees. A reptile/amphibian tunnel is proposed near the junction to allow animals to move between habitat areas.

#### Land within the Tesco car park and The Coal Woodland

6.51 Heading eastwards, the route moves through the eastern extremity of the superstore car park and into an area which is the Coal, Kennetmouth and Kings Meadow East Local Wildlife Site (LWS) ('The Coal Woodland'). A number of organisations including BBOWT are concerned for the effect on The Coal Woodland and several commentators have questioned the need to replace so many parking spaces. The proposals originally sought to remove part of The Coal to provide compensatory parking provision to the superstore car park, but this is now no longer required (see discussion below). The Coal will, however, still be reduced in size and this is due to land-take from the MRT route itself.

- 6.52 This woodland is approximately triangular in shape and lies to the West of the Kennetmouth. The Coal is described as 'open mosaic habitat on previously developed land' with woodland, semi-mature trees and riparian vegetation. Until approximately the 1930s, the area appears to have been goods railway shunting yards. The Coal has grown and has become a wooded area which contains various habitats but also non-native species. The Woodland includes the Thames Path which runs along its North and Eastern edges and a path which runs diagonally across.
- 6.53 The LWS is one of a number in the Borough which area currently subject to limited management by the Council's Leisure and Recreation service. Although subject to high levels of anthropogenic disturbance, it provides habitat suitable for legally protected species. It will be adversely affected because it will be reduced in size by land-take for the MRT itself (route, embankment, etc.) but also new connecting footpath/cycleway connections coming into the Woodland, in order to provide connections from the western side of the Kennetmouth (and Newtown) to the MRT and this has an embankment too. The loss of part of the LWS therefore includes the loss of an area of lowland mixed deciduous woodland, which is a Habitat of Principal Importance under Section 41 of the NERC Act. Therefore the proposal will result in the physical loss of part of The Coal and there will be disturbance from the bus lane. Light pollution to wildlife (e.g. bats) would be minimised through the design of the lighting. The banked areas will change part of its character, although it should not reduce its attractiveness as its public open space function, as paths are (re-)provided. The Coal may also provide habitats for mammals, although the applicant advises that access through the area would not be impeded as the embankment includes culverts and a reptile/amphibian tunnel.
- 6.54 Of particular note is a local flower, the 'Loddon Lily' (*Leucojum Astivum*) which is found on a side bar on the right bank of the River Thames and this is a nationally scarce plant on the 'red list' and is a priority species in the Biodiversity Action Plan. The Thames Valley is the stronghold for this species and therefore all populations should be protected. The proposed bridge comes very near to the area of the lily habitat and may adversely affect it. The ES chapter concludes that the riparian habitat at the confluence of the River Thames and River Kennet where Loddon lily was recorded is located outside the proposed MRT East development boundary and therefore the location of the lily which is in situ will remain unaffected by the works.
- 6.55 As originally submitted, there was concern that there was insufficient mitigation/ compensation for the habitat loss which would occur from the scheme. The number of replacement car parking spaces, which were originally proposed to aid compensation for those lost within the Tesco car park (July 2017 Submission), has been reduced and now affects 30 spaces, a comparatively minor reduction in the overall number of parking spaces within the car park. Site observations and a meeting with Tesco confirmed that their car park was not fully utilised, although no parking survey has been undertaken. Officers sought views from RBC Transport Strategy and consider that the loss of superstore parking is not significant to the superstore's operation and are content that there is no conflict with Policy CS24. As a result of the changes, less area of The Coal Woodland is lost and 824 sqm of semi-natural habitat will be retained and an additional 17 individual trees and 8

tree groups will also be retained. The amended scheme now results in the planting of 81 new individual trees overall (including eight new trees within The Coal Woodland), plus 4 individual Black Poplar trees off-site in King's Meadow (see below).

6.56 As originally submitted, a number of concerns for the impact on The Coal were raised by RBC Leisure and Recreation, who manage The Coal. In tandem with the revised proposals, ecological mitigation and enhancement proposals (with agreed costings for RBC to implement) have been agreed with the applicant. An overview of these arrangements is provided at the end of this report and indicates that in The Coal, there would be a combination of additional mitigating native and species-rich planting, with on-going management. This would include native understorey planting in the woodland. In the area of The Coal outside of the red line, the management would include removal of invasive non-natives (Himalayan Balsam, Buddleia), selective tree works and further planting of the understorey. The Natural Environmental team's response to these changes is awaited.

### The Kennetmouth

- 6.57 The Kennetmouth, as its name suggests, lies at the confluence of the River Kennet with the River Thames. It is an important but rather understated part of the Borough and the meeting of these two rivers is likely to have been at least part of the reasons for the founding of the town. Now, the Kennetmouth is a very mixed location dominated by the main Paddington railway line above and the more tranquil boating uses and cyclists and walkers using the attached 'accommodation bridge' at the lower level. The middle of the Kennetmouth is the Borough boundary with Wokingham Borough.
- 6.58 In this section, the discussion below concentrates on the creation of the bridge over the Kennet. There are three main sensitivities of the proposal in this area: the visual effect of the development; effect on landscaping and ecology; and impact on cultural heritage.



Visual effects

- 6.59 As described above, the Kennetmouth has a rather mixed character, with the industrial Brunel-designed railway bridge and attached footbridge/accommodation bridge spanning the Kennet below. The sensitivity is principally the effect of the proposal on the setting(s) of the older bridges, which are Grade II Listed.
- 6.60 The location of the crossing point has been carefully selected as has the height of the structure over the Kennetmouth. The distance and the height mean that views of the historic bridge would be largely capable of view even with the proposal in place and this would be in large part due to the overall span between the abutment/pillars. Although there would be some harm to the setting of the Listed structure, such harm would be generally from viewpoints on the river itself and many views of the bridge would not be adversely affected. It should also be noted that views the Listed bridge are already experienced in this a semi-urban environment, for example, slightly further south, large gas pipes cross the river.
- 6.61 In response to advice from officers and the d:se Design panel, the applicant has provided some important design improvements to the bridge at this point, which include the introduction of a patinated (rusted) steel girder and slimming down the underside of the structure and these features continue on into the viaduct section discussed below. The supporting columns have also been reduced in to a single column design. Officers welcome these changes and overall consider these to be contemporary and smooth structure, with the steel elements echoing the industrial heritage of this area and this would also help to provide a suitable setting to the Listed structures. The applicant advises that the detailed cross-bracing required under the bridge has yet to be designed and this aspect would need to be subject to a planning condition, but again, officers would expect to see elements of steel to reflect remnants of the industrial character. Overall, officers are satisfied that in this area of the scheme, policies CS7, CS8 and CS33 are satisfied.

# Landscaping and ecology

6.62 Effects on the Kennetmouth in this area include overshadowing the rivers themselves and the existing trees either side. The Western side of the bridge will be supported by a concrete abutment, this then grades to an embankment, requiring some land re-grading, but this is not considered to significantly affect the character of the Kennetmouth. On the Eastern side, the bridge will become a viaduct and at this point on the Wokingham side meets two mature Willow trees. Willows are a nativeEnglish riverside tree species. The design of the original proposal meant that both trees would have been lost, but the redesigned supporting columns allow for the retention of one of the Category A Willow trees. This area would include mitigating species-rich planting including tussocky grasses and trees. Again, detailed input from the Natural Environment team is required.

# Cultural heritage

6.63 In this area of the Kennetmouth on the Eastern bank is a mosaic sculpture. It is a model featuring a curved brick-built bench seat used to represent the bridges and this sits on a mosaic tiled floor, which is the Kennetmouth itself. The sculpture is in generally poor condition and is in a rather overgrown spot set back away from the Thames Path behind the Willow trees. The existing mosaic is proposed to be carefully documented/ photographed, lifted, repaired and reinstalled into a new area which is more visible to passers-by. New seating would be provided at the relocated mosaic near to the location of the timber mooring platforms, where

enhanced views of the river may be enjoyed and storyboards would describe the sculpture and the importance of the Kennetmouth.

6.64 These enhancements have been suggested by officers and augmented by the applicant and these would be delivered via planning conditions/obligations (as appropriate) as part of the mitigation strategy for the inclusion of the bridge at this location and the new bridge itself would be included as part of the evolution of the crossing of the Kennetmouth.

### East of the Kennetmouth to Thames Valley Park (TVP)

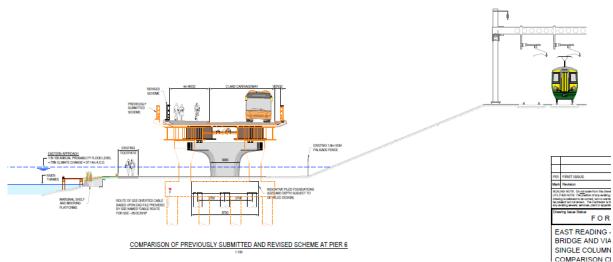
- 6.65 This section of the route from the Kennetmouth Eastwards lies within Wokingham Borough. Therefore, control of any conditions or obligations would lie with Wokingham as the LPA and not RBC. Nonetheless, this appraisal shall discuss the suitability of the proposal in terms of Reading's policies. The principal matters to consider are visual effects; and landscaping and ecology.
- 6.66 This part of the town is outside of the settlement boundary in the Wokingham Local Plan, so it should be classed as development within the countryside. The effect on urbanising this area is therefore a relevant consideration to the assessment of the application and is likely to be a significant consideration to the assessment of the suitability of the application being dealt with by the neighbouring Planning Authority.

### Visual effects

- 6.67 It is clear that in this area at least, in visual terms, the proposal would be prominent structure, being a grey concrete elevated roadway. Officers have therefore worked with the applicant to investigate measures for reducing the visual impact of the proposal as far as possible/practicable.
- 6.68 Following officers' and the design panel's concerns about the overbearing nature of the structure in relation to the edge of the Thames, the applicant was asked to look again at what can be done to reduce the visual impact of the development, and in particular at the pinch-point where the width is narrowest (this point is roughly due North of the Eastern gasholder located on the other side of the railway line in Suttons Business Park and corresponds with a point roughly equidistant between Piers (columns) 6 and 7 of the amended viaduct proposal). This has been a complicated redesign and has involved extensive rounds of discussion with Network Rail, sse and the EA. The result is that in this locality, the road now reduces the total width of the proposed footway and cycleway for a short section from 5m to 4m. The width of the main public transport carriageway remains unchanged.
- 6.69 Further, the viaduct is now proposed to be supported with a central single Tcolumn design, instead of the originally submitted two-column design. This design would run along the length of the viaduct East of the Kennetmouth, until the viaduct gradually grades back to ground level towards the P&R site. The concrete columns will flare out to the 'T' shape to support steel beams which have in turn been moved further under the viaduct to enhance the sense of openness which would be experienced under the structure.
- 6.70 Whilst the appearance of the proposal in this section of the route would be most obviously apparent, it would also be remembered that the backdrop to this

structure is the railway embankment itself and atop this are the galvanised rail electrification gantries, which would to a certain extent be mirrored by the railings proposal for the parapet on the viaduct. But it is intended that the various simple yet elegant forms of the proposal - the gentle sinuous curve of the structure, the steel beams and the curved supporting columns - provide elements of excitement in the design detail and result in a strong, proud design, rather than simply a utilitarian 'flyover' structure.





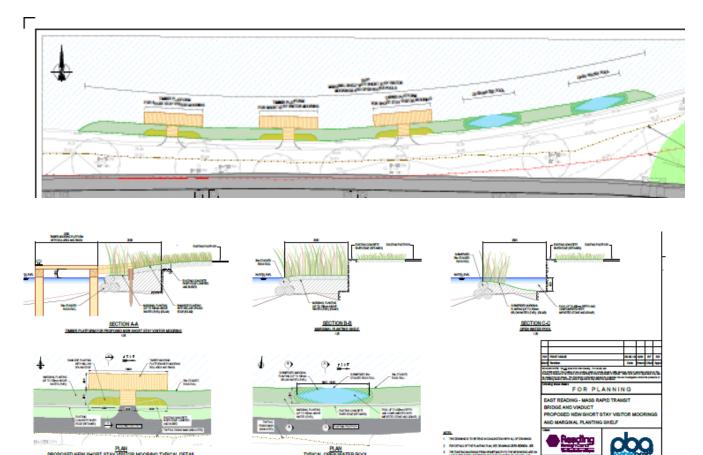
Cross section comparison close to riverside (at column no. 6, ie. the area at the pinchpoint, where the MRT would come closest to The Thames) 6.71 The slimming down of the columns on the underside was brought about on officer advice and the applicant has worked hard with both Network Rail and SSE to be able to move to looking at various options for a single-column solution, which would be carefully placed in relation to oversailing the main railway line and keeping the cable easement clear. The proposed single columns are considered to be more elegant and reduce the footprint, compared to the two-column design in the July 2017 Submission, as well as creating a greater sense of increased openness for Thames Path users.

### Landscaping and ecology

- 6.7 The present area, as a somewhat isolated area of urban fringe, particularly at night, can often be the location for antisocial behaviour and rough-sleeping. The proposal needs to be cognisant of these risks and should at least seek not to inadvertently augment such issues. At present, there is no lighting of the Thames Path and officers consider it important that this feeling of rurality should continue, as far as possible.
- 6.73 Officers consider that the original/early attempts at mitigating the impact of the structure on the riverside environment were not capable of successfully mitigating the localised but nevertheless significant environmental harm which would be caused. Earlier landscaping schemes included shrubs and items such as 'fedging' (a fence essentially made from a hedge) as landscaping mitigation, but these were considered to be inappropriate, largely through their rather flimsy nature and even if successful, these would have felt to officers like a very 'catalogue' urban designer's solution, whereas what was needed was a more organic and natural solution to mitigation. Other early options for uses in the riverside area were abandoned boats and an adults' cross-training park. Your officers rejected these ideas on grounds of clutter and considered that these too, were inappropriate mitigation responses.
- 6.74 The applicant has looked at various different alternative use and design options for the difficult issue of dealing with the underside of the viaduct/riverside, which included animating the area for leisure uses such as boat/canoe chandlery or storage or leisure events (as suggested by the d:se Design Panel) or fencing off the area completely to create a wild ecological space. As with the lighting, officers felt that the idea of trying to force potentially inappropriate uses which may have harmed the tranquil character of the area was not the correct solution. Fencing off the area was considered, but ultimately rejected on the basis that this may cause on-going maintenance issues, for example becoming a litter-trap or fly-tipping area.
- 6.75 The applicant's solution to this has been to introduce a new ecological area beneath the viaduct. Areas of shallow marshy wetland and grasses would be created, providing an area for seasonal flooding, and a diverse marshy habitat, where it is hoped the locally-occurring Loddon Lily would flourish, as it grows in swampy or damp soil. The area under the viaduct is proposed to remain open and unfenced to allow people to see beneath the viaduct, whilst discouraging public access beneath the viaduct (due to the wetland/marshy area). The updated landscape design is illustrated in the Landscape and Ecology Strategy. The advice of Thames Valley Police's Crime Prevention Design Advisor is sought on this, but officers consider that this is a good solution, which could potentially resolve a number of conflicting issues. That said, monitoring the effectiveness of this area

(again, by the RBC Leisure and Recreation service) will be key and the section below discusses the monitoring arrangements for the scheme.

6.76 The updated proposals include a long section of riverbank works, which include a combination of structural repairs to the degrading riverbank itself to restore present temporary mooring opportunities (near the Kennetmouth) and the introduction of additional moorings platforms and what the applicant describes as a 'marginal shelf'. These aspects of the mitigation strategy have evolved during the consideration of this application, with neither the EA nor your officers being satisfied that the original proposal was sufficient to mitigate the wide-ranging environmental impacts of this scheme.



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Top: plan of the marginal shelf and boardwalk mooring platforms Bottom: details and sections showing the establishment of grasses on the marginal shelf.

Top: plan of the marginal shelf and boardwalk mooring platforms Bottom: details and sections showing the establishment of grasses on the marginal shelf.

6.77 The applicant investigated various options to mitigate the environmental impact of the scheme and whilst early attempts to increase some kind of width into the Thames were cautiously welcomed by your officers; unfortunately this attracted a further reason for concern from the EA on the basis of inconsistency with the EA's Navigation Policy, where extensions into the River are only allowable in certain instances (river-related works, recreation, etc.). This is not a scheme which is principally for the purpose of the river nor its function or for recreational purposes. But the mooring platform/marginal shelf solution provided the applicant with an

opportunity to improve temporary visitor mooring opportunities (to satisfy the EA concern) and in turn, enhance habitats and the appearance of the riverbank environs.

6.78 The three mooring platforms extend into the river in a T-plan (see diagram above) and these are essentially boardwalks to allow temporary visitor mooring, with each one would accommodate one boat. The addition of the marginal shelf is an innovative design solution. It effectively 'widens the riverbank' at a point where such width is most required. This allows a stronger visual mitigation of the scheme, by providing a natural extension of the bank where there is a generous width to the river and the EA has informally indicated that impacts on navigation are acceptable. The shelf provides habitat advantages, allowing native reeds and grasses to populate the shelf in between the bank and the boardwalk, with the appearance of a natural edge to the river. As can be appreciated, the extension of the width of the riverbank, coupled with the new ecological area under the structure should combine to produce a pleasant and 'natural' space to frame this part of the Thames Path; drawing views along the riverbank and allowing the visual impact of the structure to recede. At the pinch-point, the addition of the shelf means that the width of the riverbank, as extended (i.e. until the edge of the underside of the viaduct would be 8 metres, but with the space under the viaduct from the slimmer structure and column spacing, this would feel wider. There is more discussion of further off-site ecological enhancements in the section below.

Off-site and general environmental enhancement measures

- 6.79 As a result of the amended plans, further off-site ecological works are as follows:
  - King's Meadow: planting of four Black Poplar trees
  - North of King's Meadow: rotational management in order to reduce invasive species within this belt of vegetation near the Thames Path
  - South of Hill's Meadow: one-off project to resolves tree and undergrowth management, followed by rotational annual maintenance of this belt of vegetation
  - Hills Meadow: installation of bird and bat boxes
- 6.80 These are all carefully selected additional mitigating works and the applicant considers that these will sufficiently counter the impact of the scheme in environmental terms and the option of off-site mitigation additional to the on-site mitigation was an option favoured by officers, the EA and the applicant when it became clear that on-site mitigation alone was not going to be sufficient to adequately off-set the environmental impact of the scheme.
- 6.81 In summary, this section of the Thames would undoubtedly be significantly affected by the proposal in visual and ecological terms, but the applicant has made significant improvements to the scheme in these respects. Officers welcome these improvements and are generally satisfied that they indicate a strong design to the proposal and innovative landscaping and ecological mitigation. The response from the Council's including the Ecologist is awaited on these aspects of the proposals, and in particular they are considering the extent to which the details of what is proposed is robust. Officers anticipate compliance with Policy CS36 and will advise of any further issues/conditions or controls in the Update Report.
  - (d) Other environmental effects

# Flooding

- 6.82 The area is liable to flooding and the scheme has included flood mitigation proposals as 'flood compensation', as part of the design proposals. This is necessary because of the areas of land-take within the site embankments/abutments and columns all take away valuable flood storage volume and restrict flows in a flooding event.
- 6.83 The original application submission attracted part of the objection from the EA to the scheme, but this aspect of the EA's objection informally has been removed. The flood compensation proposed is essentially the creation of scooped areas of ground in carefully selected locations in order to provide 'level for level' compensation (i.e the scooped areas provide inundation at the same grounds levels as are being lost via the scheme).
- 6.84 As well as on-site compensation, additional amendments submitted since the original submission include:

o Lowering of an earth embankment to the immediate north-east of the superstore; o Lowering of an earth embankment to the north-west of the superstore; and o A cutting into the embankment at the eastern end of the MRT (where the land rises out of the floodplain near the new P&R site).

6.85 For clarity, the current proposals now omit proposed ground lowering within the Tesco car park. These amendments have been informed following consultation feedback from the Environment Agency. As these areas fall across the local authority areas and on Third Party land in some cases, it is proposed to controls these engineering works via s106 in order to achieve compliance with the NPPF and Policy CS35.

# External lighting

- 6.86 Officers have considered the matter of lighting of the structure carefully and this is another area of the scheme which has been amended since the application's submission.
- 6.87 The proposed lighting on the viaduct has been amended from the high-level column lighting in the July 2017 submission to continuous low-level LED linear lighting within the upper rail of the northern parapet on the viaduct and bridge, facing southwards (i.e. away from the River Thames) to gently light the pedestrian/ cycle way only. This will reduce potential landscape and visual impacts of the structure (compared to the submitted design) and provide adequate lighting levels to illuminate the proposed footway/cycleway and minimise light spill from the structure on surrounding habitats, for example, this should minimise impacts on bats 'commuting' along the Thames. The scheme retains pole-mounted lighting from The Coal westwards. Detailed design of the lighting is required to be submitted, via a proposed condition. Officers considered the matter of lighting the area under the structure to deter rough-sleeping, but this was considered to be unnecessary light-spill and not required, providing that the wetland area is maintained adequately. Overall, officers consider that the correct balance has been struck between the operational requirements of the proposed highway on the one hand and the sensitivities of the landscape and ecology on the other.

#### Archaeology

- 6.88 Although the applicant's archaeological assessment highlights this potential it also states that the HER contains no evidence of any buried archaeological remains of interest being located within the study site. Berkshire Archaeology comments that although this is true it should be qualified that, with the exception of a small number of trenches in the eastern part of the site, this is due to no archaeological work being undertaken within this area previously so this does not necessarily indicate the archaeological potential.
- 6.89 Berkshire Archaeology advises that there have been previous impacts within some areas of the site, including gravel pits to the east and the superstore development at the western end. In addition a review of the geotechnical reports shows a landfill site is present to the east of the existing superstore and within the area of the embankment. There will therefore be areas where it is likely that archaeological deposits have been previously affected. Given the potential for archaeological remains to be affected, archaeological field investigations will be required to provide further information. In light of the possible presence of Saxon burials, pre-determination investigations should be completed to evaluate the potential for Saxon remains to survive. For the remaining archaeological investigations it is recommended that a condition requiring an archaeological investigation is attached to any planning permission granted, to mitigate the impact of the development and comply with Policy CS33.

**RBC Environmental Protection considerations and residential amenity** 

- 6.90 The Council's EP Team is concerned with four aspects of the scheme and each is discussed below.
- 6.91 EP is concerned for noise during the construction and operational phases of the development and their concern is primarily for the amenity of the Luscinia View flats near the superstore, on Napier Road. Regarding construction, this would need to be covered in a construction management statement (CMS). Regarding neighbour amenity, the EP Team has requested a noise report, but the location of the proposed stops is some distance from the flats. These flats will experience a certain level of noise anyway; they are near the railway and access road to the superstore. It is also not clear what noise mitigation, were a report to require such, could realistically do. In any other situation, were the Highway Authority to propose the siting of a bus stop on the public highway then a Traffic Regulation Order would be required in the normal way and any specific recommendations taken into account. For the above reasons, officers do not consider that a noise report is required.
- 6.92 Impacts on air quality in the construction phase would also need to be controlled via the CMS/CEMP. Impacts on air quality on Napier Road from the development when operational are considered to be well within the National objective level.
- 6.93 EP have considered the contaminated land reports contained within the accompanying Environmental Statement and on the whole, they find the risk to be low, although there are potential pollution linkages to consider and the main concern is risk to construction workers. EP have advised site controls, but these appear to be H&S -related, not planning-related and officers advise that this could be covered via informative. EP do however recommend conditions for piling design and unexpected contamination reporting and conditions are advised. Conditions regarding a CMS, hours of working (standard) and no bonfires are all accepted.

6.94 Any impacts above on further residential areas are not considered to be significant and officers identify no other areas of concern. Subject to conditions, officers advice that the proposal complies with policies CS34 and DM4.

#### <u>Sustainability</u>

6.95 The development proposes no buildings, so usual standards for energy efficiency and energy generation are not relevant. The Council's Sustainability team and the local Climate Change Partnership has considered the application and conclude that the general purpose of the scheme itself is positive in environmental sustainability terms, through reduction in car journeys and carbon emissions. The Sustainability Team echoes the advice of the Design Panel in seeking to ensure recycling material forms an element of the scheme. The submitted Sustainability Assessment explains that sustainable materials with low environmental impact will be used and sourced from the local supply chain where possible (more details to be supplied in the Update Report). Construction and operational waste will be managed in accordance with the waste hierarchy: eliminate, reduce, reuse and recycle. Overall, officers consider that NPPF chapter 13 and adopted Policy CS2 sustainable use of materials are satisfied.

# Environmental statement

- 6.96 The scope of the ES was agreed originally in the Scoping Opinion, and the the scope of the ES Addendum was also agreed with officers. It should be noted that the Environmental Statement has been amended firstly by the Addendum (ES Addendum) (dated April 2018), then this has been further updated to provide further information during the determination period of the planning application, under Regulation 22 of the EIA Regulations. There have been many alterations to the ES in the May 2018 submissions.
  - (e) Transport technical matters

# Technical design standards

- 6.97 The sections below cover the transport technical matters, where not captured by the sections elsewhere in this report and generally relay the Highway Authority's detailed points on the application.
- 6.98 The East MRT Scheme has been designed as an 11.5m wide corridor comprising a 6.5m two- way carriageway, 3m two-way cycle lane and a 2m footway. The link narrows at the proposed bridge over the River Kennet at the Kennetmouth and again at the pinch-point in Wokingham Borough (near Columns 6 and 7). At the bridge, shuttle working will operate with a signal/indicator system to allow bus progress between the stop lines 190m apart.
- 6.99 The proposals result in an alteration to the adjacent Tesco Car Park Layout and drawing 28791/5523/007B illustrates the existing and proposed car park layouts, with appropriate aisle width for manoeuvring out of the spaces. The proposed layout results in the loss of 30 spaces to the Tesco car park. Transport Strategy advises that this reduction in spaces amounts to approximately 4% of the overall provision of approximately 800 parking spaces. The parking provision provided is well in excess of the Council's current parking requirement for the superstore and as a result this slight reduction is considered not to be significant and is therefore

accepted. The store operator currently objects to the application. It must be remembered that the East Reading is one of three MRT routes in the Borough and as with all major transport infrastructure projects, there will be local interests which will not support the individual proposal. As part of project-planning the scheme through the planning process, the applicant is separately progressing the legal means to secure all land required for the route with the various landowners to enable the development to be implemented.

- 6.100 Drawings have been submitted that identify the gradients of the proposed route and these specify that the gradients comply with the Design Manual for Roads and Bridges (DMRB) and DfT document 'Inclusive Mobility' and therefore are acceptable in principle, further detail in relation to gradients are specified below.
- 6.101 Transport Strategy had previously queried what measures would be put in place should the proposed signals along the route fail given the distances of one way flow and the obstructions to forward visibility. It has been clarified that each stop line will be controlled by a primary and secondary signal/indicator. To reduce the possibility of the signal/indicators failing over the bridge, the primary and secondary Signal / indicators, both located on the nearside of the carriageway, will be powered through different electrical feeds. Therefore, if one were to fail, the other should still be operational. In the very unlikely event that both electrical feeds fail, outbound buses will divert to use the A4 Kings Road and London Road until the signal/indicators are operational.
- 6.102 The East MRT Scheme's proposed junction with Napier Road has been designed to maintain the priority route to Tesco. It has been stated that Manual for Streets (MfS) visibility requirements have been met and the updated drawing (28791/5523/003B) illustrates they can be accommodated.
- 6.103 A right turn filter lane accommodating two buses has been provided for the right turn from Napier Road into the East MRT Scheme following consultation with Tesco. Tracking diagrams have been provided for buses entering and exiting the MRT route at Napier Road and as a result these are acceptable.

#### Phasing and TVP Park and Ride

- 6.104 There is an SGN gas valve at the western edge of the Thames Valley Park, Park & Ride. Phase 1A of the scheme retains the valve and in Phase 1B the valve is proposed to be relocated. The Phase 1A scheme includes a one-way section of 3.5m wide carriageway with signal/indicators either end approximately 100m apart, and a shared footway/ cycleway which narrows to 2.5m at this point. The Phase 1B scheme mirrors the permitted Thames Valley Park Park & Ride scheme with a 7.3m carriageway and 3.0m shared footway/ cycleway. Again this is deemed acceptable as it complies with National standards.
- 6.105 Phase 1B will commence when funding is secured and utility diversions are completed. Phase 1B could be delivered immediately with construction of the scheme, therefore with this scenario, the shuttle working section at the eastern narrow point (adjacent to the gas value) will not be delivered. At this stage, officers are not proposing conditions or obligations to link the MRT scheme to the P&R permission, although any further consideration of this matter would be provided in the update report.

#### Pedestrians and cyclists

- 6.106 Policy SA14 seeks to maintain and enhance cycle routes. Policy DM12 seeks not to cause conflicts with the local highway network. Eastbound cyclists would travel along Napier Road and use the right turn ghost island at the East MRT Scheme/ Napier Road junction to wait and turn into the new link. As they enter the scheme from Napier Road, a dropped kerb facility is proposed on the left-hand side of the carriageway into the shared footway/ cycleway. The shared use section continues for approximately 80m before becoming segregated foot and cycle ways, which are used for the majority of the scheme (there is a short shared section at the above pinch-point). Westbound cyclists travel along the segregated cycle way and into the shared footway/ cycleway to a central island where they then exit onto the westbound carriageway and access Napier Road via the priority junction.
- 6.107 Pedestrians arriving from the western end of the East MRT route will use the footway on the southern side of Napier Road. Pedestrians then have two opportunities to cross from the southern side of the scheme to the footway on the northern side that continues the full length of the new East MRT route. These crossing facilities are a refuge island crossing located at the Napier Road junction and a zebra crossing adjacent to the pedestrian access to Tesco. Pedestrians travelling westbound and exiting the East MRT footway on the northern side can cross to the southern side to reach Napier Road footway. Pedestrians can then access the Napier Road underpass through to Forbury Retail Park and Kenavon Drive residential area, or continue along Napier Road. The Highway Authority is satisfied with the technical standards proposed by the scheme.

#### Access issues

6.108 It should be noted that the proposal will provide a safe, accessible route with suitable gradients, as opposed to the Thames Path and the Horseshoe Bridge, which has steps. The Highway Authority is satisfied with the technical standard of the scheme, but the Council's Access Officer has made some detailed points about access, gradients, impacts on partially-sighted people, etc. These comments would be taken into account further in the detailed design of the scheme, which would be agreed via conditions where consultation with the Council's Access Officer would be sought

# Equality Act

6.109 In determining this application, the Committee is required to have regard to its obligations under the Equality Act 2010. The key equalities protected characteristics include age, disability, gender, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sexual orientation. There is no indication or evidence (including from consultation on the application) that the protected groups have or will have different needs, experiences, issues and priorities in relation to the particular planning application. In terms of the key equalities protected characteristics it is considered there would be no significant adverse impacts on equality issues as a result of the development.

# Other issues from objectors not covered by this report

6.110 This major transport project in this sensitive and valued area of the Borough is a proposal which has understandably resulted in the receipt of strong responses from a significant number of objectors. This report has attempted to cover the range of

issues raised, but the Update Report is likely to need to capture any other outstanding matters raised.

### **Implementation**

#### Construction phasing

- 6.111 With this major infrastructure scheme there are issues related to the construction of the proposal.
- 6.112 It is anticipated that, subject to planning approval, construction of the scheme will commence in July 2019 with completion expected in Spring 2022. Some seasonal site clearance may need to commence earlier in 2019. The main construction phases comprise: service diversions; flood plain compensation measures; construction access and haul roads; piling; pile caps, abutments, retaining walls, pier construction and drainage works; western embankment and associated supporting structures construction; surface water drainage systems; assembling main bridge and viaduct beams involving a 600+ tonne installation crane; bridge and viaduct deck concrete pouring; road construction and finishing (including parapets and lighting); and finally, landscaping and ecological mitigation.
- 6.113 Any environmental effects arising during the construction phase of the proposed development will be controlled through the implementation of a Construction Environmental Management Plan (CEMP)/CMS, to be agreed via condition prior to commencement of construction. The CEMP will outline the arrangements and management practices to adopt in order to minimise the environmental effects of construction.

# <u>Controls</u>

6.114 Various obligations are proposed in the Recommendation above relating to phasing triggers, use of the MRT and matters such as employment and skills mitigation. A fuller response will be provided in the Update Report.

#### Monitoring/maintenance

- 6.115 Regarding the MRT itself, this will be an adopted highway structure and the two Transport Authorities are currently in discussion regarding the maintenance regime which would be applied.
- 6.116 Both the specifics of the ecological mitigation of this planning application and the new requirements under the 2017 EIA Regulations require that the proposal is subject to long-term monitoring to ensure the mitigation aspects of the proposal continue to operate correctly. Given the cross-authority nature of this application, it is advised that this should be dealt with by s106 obligation and there are three main areas for this on-going monitoring, all related to ecology.
- 6.117 The first is in relation to the ecology management arrangements generally, including the 'off-site' works (King's Meadow, Hill's Meadow). These are to be the responsibility of the Council's Leisure and Recreation service. Secondly is the specific maintenance requirements required for ensuring that the marginal shelf does not degrade in the river. The third area covers the new wetland area under the structure and again, this will require careful management to ensure it establishes and is then monitored. The applicant also identifies the risk of the

wetland area not establishing satisfactorily and in such an instance advises that the under viaduct area probably needs to revert to one of the original options, that of fencing off the area.

# 7. CONCLUSION

7.1 This application has taken some time to bring before this Committee and this has been due to complexities of adjusting the scheme as issues have been addressed and the necessary mitigation. This has involved detailed negotiation between the applicant, your officers, the Highway Authority, Network Rail, the Environment Agency and various landowners and Statutory Undertakers in order to investigate possibilities to improve the scheme. Officers welcome the improvements which have been made.

### 7.2 In summary:

- Policy at national and local level supports the need for sustainable transport schemes which will cut private car journeys and reduce carbon emissions and this proposal is identified in adopted policies of this Council and Wokingham, as an important part fo the solution to transport issues experienced in East Reading and the Greater Reading area.
- The proposal will generally improve air quality within the area in part of the Borough which experiences poor air quality and assist traffic flows on the local road network.
- It is accepted that the proposal will have adverse environmental impacts in terms
  of the character of the Thames and ecology and produces conflict with a number of
  adopted planning policies. But care has been taken with the design in order to
  produce a scheme which is as sensitive as it can be to this environment and
  providing appropriate mitigation including off-site compensatory mitigation, in
  accepting the need for the proposal.
- Officers advise that in this case, the Committee must give special consideration to the wider strategic benefits of the scheme for the Thames Valley Sub-Region and also its benefits over the longer-term, for encouraging bus use, but also more cycle and pedestrian journeys. The East Reading MRT is considered to be essential strategic infrastructure to help to deliver a behavioural change in travel habits.
- This report explains that for each part of the route, mitigation of the environmental effects has been designed as part of the scheme and will be delivered and will continue to be monitored to ensure the establishment of the structure as a suitable addition to the landscape.
- The proposal is considered to be suitable in terms of environmental issues: flooding, archaeology, and contaminated land risks and raises no significant issues of residential amenity or other social impacts.
- Sometimes difficult choices need to be made in the present to bring about environmental gains in the future and the strategic need for this project is considered to be very significant. This proposal is anticipated to bring substantial public benefits and in this case, these outweigh the identified harm. Overall, this proposal is considered to fit the definition of sustainable development as contained in the NPPF.

# Case Officer: Richard Eatough

Plans: [full list of plans to be advised in Update Report]

Update report to include long 'general arrangement' plans.

Next page: plan showing areas of ecological management

