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Reading Transport Strategy 2036 – Statutory Consultation Response from the Chilterns Conservation Board

The Chilterns Conservation Board (CCB) is grateful to be consulted on the Reading Transport Strategy 2036 (RTS).

We did not find that the format of the anonymous online survey presented alongside this consultation was conducive to our response. We trust that this submission will be considered by Reading Borough Council (RBC) as being in order.

CCB's Planning Committee considered the Reading Transport Strategy 2036 at their meeting of 15 July 2020. The Committee resolved to make an objection to the proposals relating to the North Orbital Road and the Third Thames Crossing due to the following concerns:

- a) the proposals would adversely impact visually on the Chilterns AONB;
- b) the proposals would increase traffic through the AONB with consequent damaging impacts to settlements, tranquillity, air quality and biodiversity; and
- c) the third bridge was unnecessary, in the context of current and anticipated changes in patterns of working and travel, which should also reduce the pressures on Caversham.

The Committee noted that the Reading Transport Strategy as a whole has many merits, in particular the deeply embedded support for active travel and for public transport. The Committee also recognised the high traffic flows, congestion and air quality issues that affect Caversham and the surrounding area, but considered that solutions needed to be identified that were less harmful to the Chilterns AONB and its setting, especially in the context of the climate emergency and the post-Covid 'new normal'. The Committee also raised concerns about the lack of details relating to these proposals as set out in the Strategy.

The remainder of this submission sets out our concerns in more detail.

We recognise that the Chilterns AONB does not fall within Reading Borough Council's area, and hence that RBC is not a member of the CCB, and have no formal commitment to the [Chilterns AONB Management Plan](#) (CMP). However, RBC is bound by the duty in section 85 of the Countryside and Rights of Way (CROW) Act 2000 to "have regard to the purpose of conserving and enhancing the natural beauty" of any affected AONB. In that regard, we would like to draw your attention to policy DP14 of the CMP, which states:

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

This year, the CCB has begun to engage with transport authorities within the area covered by the AONB in order to seek a common approach to transport planning in and around the Chilterns. We now hope to bring Reading Borough Council in to future discussions and will be writing to the relevant member(s) and officer(s) shortly.

The RTS recognises that many of its proposals, including the North Reading Orbital Route, northern Park and Ride sites and the Third Thames Crossing, cannot be delivered without the use of land in neighbouring authorities' areas. Hence it is welcome that RBC are engaging with the relevant councils and communities beyond their boundaries. We request that the CCB is engaged on any future consultations relating to the details of the proposals discussed in this response (as well as other proposals in the Caversham area, such as Demand Management, Transport Corridor Multi-Modal Enhancements and Quality Bus Corridors, all of which initiatives are supported in principle).

We are concerned about the lack of detail contained within the RTS on the nature, locations and routes of the proposals to the north of Reading, specifically the Orbital Route, Park and Ride and Third Thames Crossing. This lack of detail makes it difficult for the reader to assess the potential impact on the AONB, and there is a similar lack of precision within the RTS and its accompanying assessments of anticipated direct, indirect and cumulative impacts on the AONB and its setting (see CCB's Position Statements on cumulative impacts and the setting of the AONB [here](#).) It is therefore hard to see how the council intends to fulfil its duty under the CROW Act. Specific consideration needs to be given to the direct and indirect impacts on the AONB and its setting in this area, noting that:

- a) the boundary of the AONB is contiguous with the Borough boundary on the west side of Caversham;
- b) Caversham itself and the area around the town are within the setting of the AONB; and
- c) any proposals could have knock-on impacts on the volume of traffic travelling through the AONB and the attractiveness of the area for new development.

Spatial or graphical representations, or even precise descriptions, of the orbital route, park and ride sites and Thames crossing are conspicuous by their absence from the *Schemes and Initiatives* section of the RTS, e.g. pp. 97, 98 and 111, and one must rely on the “strategic public transport network” diagram on p.90 [the RTS as a whole would benefit from a single unified key diagram]. Obviously, this is presented as an indicative diagram, and not a definitive set of proposals, but the implication of implementing this diagram suggests the potential for new road construction, new junctions and/or a park and ride site on the A4074 within the AONB in the vicinity of Chazey Heath.

Furthermore, depending how far out from the built area of Caversham the new orbital route is constructed, there could be other significant direct and indirect impacts on the AONB. On this point it is worth noting that the landscape constraints map (figure 10 on p.33) downplays the presence of the Chilterns AONB by representing Reading Borough (which is as tall as it is broad) in landscape format with the northern boundary of the Borough being very close to the edge of the map. The same is true for the other constraints maps.

Our concerns here are that the orbital route, park and ride and third Thames crossing proposals (whether taken singly or all together), despite being packaged as “multi-modal” solutions with options for enhanced bus priority and future re-purposing for autonomous vehicles or light rail transit, represent a significant investment in capacity to meet the immediate needs of the users of private cars. The proposals talk of “limited highway capacity for general traffic” on the north orbital route, but there is no detail of what form this “limit” will take. In effect, the combination of the north orbital route and third Thames crossing is simply a northern and eastern bypass for Reading, taking the identified through traffic “between Oxfordshire and the M4 and southern England” (p.98) out of Caversham and the centre of Reading, but with some added bus lanes.

Previous experience with new road-building suggests that when the proposals make it easier for people to travel between South Oxfordshire and the commercial centres of east Berkshire, Heathrow and west London, as well as Reading itself (whether this is by private car or park and ride), this will encourage more people who work in those areas to live in South Oxfordshire. The construction of the roads and park and ride sites will have already had a harmful impact on the AONB, but their consequences will be that demand for homes in the AONB will increase (resulting in development pressure, and further harm to the landscape, as well as increased house prices, to the detriment of local communities, and demands for road and junction improvements). Note that, while RBC considers that its housing market area falls only within the districts of the former county of Berkshire, and has explicitly not asked South Oxfordshire District Council to identify major housing sites in their area adjacent to the boundary with Reading, a number of land agents and developers are promoting sites for development, either through the review of the South Oxfordshire Local Plan or as speculative planning applications, on the basis of the proximity to Reading and the M4; such pressure will only increase as the current proposals become more certain. The increase in journeys between South Oxfordshire and areas south of the Thames will, as is often the case with new road infrastructure, mean that the congestion currently experienced in Caversham and north/central Reading will simply return, as demonstrated in the CPRE research report [*The end of the road?*](#)

The concerns that the proposals are conceived to address – principally congestion and air quality issues in Caversham and north/central Reading – are real and need addressing, but the proposed solutions are inadequate to the task. They replace those issues, felt within Reading Borough Council’s area, with direct harm to the landscape, the potential for increased traffic and rat-running, and potentially increased pressure for development to take advantage of the new infrastructure and improved through-routes, all of which are felt outside of Reading.

Ultimately the solutions that are required to address the issues identified in the RTS must revolve around making it harder, not easier, for people to travel into and through Reading by means of the private car. This may best be achieved through some form of road pricing, such as a congestion charge or toll, balanced with improved express bus services between population centres in Oxfordshire and the employment centres of Reading, Wokingham, etc. If, as a result of road capacity in central Caversham, this cannot be achieved without a third Thames crossing, then that crossing should only be open to public transport, cycles and pedestrians, and be designed in such a way that it cannot be repurposed for unrestricted vehicular use in the future.

In addition to all of the above, the Council also needs to consider what the potential impacts might be of the ‘new normal’ post-Covid. Initial suggestions seem to be that increasing numbers of people are sceptical about regular use of public transport for work or school travel, and that this may lead to a significant increase in private car use, at least in the short- to medium-term. On the other hand, many people are enjoying the move towards more flexible, home-based working, and conducting business meetings virtually so overall commuting and business travel may be reduced. We have also seen how much more valued accessible open space is for people’s physical and mental well-being. All of this leads one to question whether now is the right time to propose the construction of road infrastructure that will directly harm the character and tranquillity of a nationally protected landscape.

CCB is grateful for the opportunity to comment.

Yours sincerely

A handwritten signature in black ink, appearing to read 'M Thomson', with a long horizontal flourish extending to the right.

Dr Matt Thomson MRTPI AoU
Planner, Chilterns Conservation Board



The Chilterns Area of Outstanding Natural Beauty

The Chilterns AONB was designated in 1965 for the natural beauty of its landscape and its natural and cultural heritage. In particular, it was designated to protect its special qualities which include the steep chalk escarpment with areas of flower-rich downland, woodlands, commons, tranquil valleys, the network of ancient routes, villages with their brick and flint houses, chalk streams and a rich historic environment of hillforts and chalk figures.

Chilterns Conservation Board

The Chilterns Conservation Board is a statutory independent corporate body set up by Parliamentary Order in 2004 under the provisions of Section 86 of the Countryside and Rights of Way (CRoW) Act 2000.

The Board has two statutory purposes under section 87 of the CRoW Act:

- a) To conserve and enhance the natural beauty of the AONB; and
- b) To increase the understanding and enjoyment by the public of the special qualities of the AONB.

In fulfilling these roles, if it appears that there is a conflict between those purposes, Conservation Boards are to attach greater weight to (a). The Board also has a duty to seek to foster the economic and social well-being of local communities within the AONB.

Like all public bodies, including ministers of the Crown, local authorities and parish councils, the Chilterns Conservation Board is subject to Section 85 of the CRoW Act which states under "General duty of public bodies etc"

“(1) In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty, a relevant authority shall have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty.”

List of Organisations providing Nominees to the Chilterns AONB Conservation Board

The Chilterns Conservation Board has 27 board members, all drawn from local communities; these are elected by:

- Hertfordshire and Oxfordshire County Councils
- Buckinghamshire, Central Bedfordshire and Luton Borough Councils (unitary authorities)
- Dacorum Borough and North Hertfordshire, South Oxfordshire and Three Rivers District Councils
- The Central Bedfordshire, Buckinghamshire, Hertfordshire and Oxfordshire Parish Councils (6 elected in total), and
- The Secretary of State for the Environment, Food and Rural Affairs (8 in total).