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25<sup>th</sup> August 2020

Sent via email to: [transport@reading.gov.uk](mailto:transport@reading.gov.uk)

To Whom it May Concern,

### **Reading Transport Strategy 2036 - Consultation Response**

On behalf of the Thames Valley Chamber of Commerce (TVCC), we thank you for the opportunity to review the Reading Transport Strategy (RTS) and provide our initial response to the consultation in this letter, prior to its closing on 30<sup>th</sup> August 2020.

TVCC is the only accredited Chamber of Commerce for Berkshire, Oxfordshire, Buckinghamshire and Swindon. We have focused our response by writing from the perspective of the business community across Berkshire as well as those within Reading and its environs. Nevertheless, the surrounding areas are also of strategic importance to TVCC as part of the wider connectivity of the region.

### **Introduction**

[TVCC](#) is one of the largest accredited Chambers within the UK and the only accredited Chamber of Commerce for the Thames Valley region. We represent over 4,000 companies in our membership. As you well know the region is home to the [UK's top two performing cities](#) (including Reading), 2<sup>nd</sup> largest trading city in the UK (Slough), the fastest growing city (once again, Reading), the [number one university in the world](#) for the 4<sup>th</sup> consecutive year (University of Oxford). We are consistently one of the highest performing regions for attracting [inward investment](#) in the UK (for which Reading is a significant contributor), and are one of the [UK's most active trading locations](#), with the Chamber itself delivering over 14% of the UK's overall trade documentation. The GDP of the Thames Valley is estimated at around £83,848 million with an expected 1.9% GVA growth rate until 2021 – outstripping the UK average.

Our consultation response to the Reading Transport Strategy (RTS) continues on the following pages.

## Vision

An overall assessment of the Vision is that it might be considered 'too narrow'. *"Our vision is to deliver a sustainable transport system **in** Reading that creates an attractive, green and vibrant town with neighbourhoods that promote healthy choices and wellbeing.... etc"* might better read **'for'**?

Replacing **'in'** with **'for'** might ensure a considerable difference in emphasis.

## Thames Valley Chamber

- Supports proposals for the **Third Thames Crossing East of Reading** (outlined on page 98).
  - However there needs to be a substantive statement on 'how' and 'when' this will be delivered (otherwise the proposal remains just that) given the apparent and consistent resistance from Councillors on the other side of the river.
  - Note the need for 'mitigation' on the Oxfordshire side of the river and encourage the stakeholders in Berkshire (including the Borough) to find solutions that allow the dispersal of traffic onto rural roads.
- Welcomes the references (no less than 12) to the **Western Rail Link to London Heathrow** (WRLtH) as a key piece of infrastructure supporting the delivery of the Strategy.
  - We read these references to the scheme as if it is already secured and delivered and we ask that more emphasis is given to the continuing need to secure it.
  - We encourage the Borough to include an unequivocal statement of support to deliver the scheme We believe it is of such economic and environmental value and that it needs all five objectives identified to have the Borough include as a stand-alone policy statement / ambition not unlike those examples on pages 98-117.
  - We note that the emphasis is on WRLtH's benefits in reducing congestion and enhancing public transport. We ask that the economic benefits to Reading and its travel to work area of increased business inward investment and retention, new jobs and wider environmental benefits are highlighted.
  - We refer you to the TVCC's own position statements and webpages on WRLtH [HERE](#).
  - We welcome your active support to help ensure the Development Consent Order is submitted this year (2020). Failure to do so this calendar year may result in extended delays.
- Welcomes the **'Mobility as a Service (MaaS)'** proposals (outlined in pages 118/9). We
  - Support initiatives/developments, such as smart ticketing, to integrate journeys across Reading and the Thames Valley to improve the experience of passengers and efficiency of travel journeys.
  - Encourage the delivery of integrated timetables and e-ticketing, that embrace smart solutions and deliver 'smart-city' technology, which are musts and should be a standard for the efficient running of any city in the 21<sup>st</sup> century – including Reading and its environs.
  - Want and encourage the Borough to engage with a future journeys scenario to help futureproof and deliver a resilient infrastructure network. We recognise the associated challenges (of predictions into the future), but suggest Reading and its environs are ideally placed to be part – especially as the town is recognised as one of the UK's digital technology hubs with its business community at the forefront of innovation in future technologies and their applications.
  - Suggest proposals must link to all existing and future planned rail services including the Elizabeth and WRLtH lines and services currently provided by GWR).

- Actively promote and raise awareness of the importance of moving people between transportation hubs and highlight solutions to address the associated challenges of ‘the last mile problem’.
- Post COVID-19 and the new ways of working that have resulted and are materialising, there is a need for, and we encourage, the Borough to be leading conversations with rail operators to expediate more flexible ticketing and, especially, season tickets. The time of the 5-day a week season ticket might not be fully over, but commuters want and will be demanding greater flexibility.
- Want to see and encourage more measures that invest in and support appropriate facilities for cycling and walking – ‘active travel’ – as outlined, for example, in the 07/2020 , [Transport Management Committee \(item 6\)](#).
- Supports the broad proposals outlined under the **East Reading Fast Track Public Transport Corridor** (page 104) to improve connectivity between Thames Valley Park and Reading town centre/railway station. However, it is evident from recent consultations, planning refusals and TVB-LEP’s subsequent pulling £19m of funding for a ‘East Reading Mass Rapid Transit (MRT) scheme’ that proposals are a long way from either being approved or implemented. We would welcome some clearer statement of intent and programme for delivery.
- Supports proposals for the **overall reduction in carbon emissions to net zero by 2030** and minimising the contribution of transport and travel to climate change:
  - Whilst we commend the ambition for the town, being 10-years away, we believe this to be a challenging ambition.
  - We would welcome the inclusion of further detail showing how this will be achieved in real terms and how progress is and will be measured as we advance to 2030.
  - It would also be valuable for the document to identify the exemplar projects we can showcase to promote Reading as a leading Borough in delivering such a target.
  - Note several references to SMART motorways. Isn't this happening anyway and being constructed right now? Therefore, consider revisiting the narrative.
  - Since publication of the Borough’s Strategy, HMG have issued a call/guidance relating to [Decarbonising Transport](#) (albeit based on an earlier publication from [March 2020](#)) which the Strategy should now consider in any refresh (see also COVID-19).
- In regards Crossrail and the wider integration of timetables and e-ticketing the Borough should
- Support closer and a more aligned approach with both Transport for the South East (TfSE) and England’s Economic Heartland from the Borough in developing the RTS. Many of the issues we outline in this consultation response have, we appreciate, wider implications and impact beyond Reading. Most immediately this will include the need to engage in the TfSE’s [area studies](#) and the ‘building block’ work most recently commission and work with them on further shaping the delivery of their 2050 vision.

Thames Valley Chamber raises the following issues and/or questions:

- A lack of any specific reference to, and consideration of, proposals for the development of the **Thames Valley Science Park (TVSP)** (University of Reading) during the Strategy plan period is an oversight. Whilst outside the Borough the implications of development proposals, on Reading and its wider environs, will be significant and necessitates a review of the Strategy to include at this time. As a basic minimum it should be referenced under the regional schemes (outlined on page 148).
- Equally we cannot see any direct references to the potential redevelopment of the **Royal Berkshire NHS Foundation Trust (RBFT)** estate and the possible impact on travel by staff, patients and suppliers that it might have most immediately and during the lifetime of your RTS.

- (Similarly) we consider the statements on the **Grazeley Garden Settlement** rather broad. We understand significant development proposals are still planned for a project that has been in the public domain for many years now. Whilst we understand that Grazeley is not within the Reading BC boundary, we encourage:
  - A stronger, more explicit, position statement with more detail (technical as well as time deliverables) would benefit the Strategy and be welcomed.
  - And suggest a more explicit, expansive statement about the need for a strategic partnership approach with public and private sector bodies. (We commend to your development plans for Sherford (neighbouring Plymouth) and Cranbrook (Exeter) in Devon and Northstowe (Cambridge) in Cambridgeshire as examples.
  - Comment on the impact on proposals of the extended [“Detailed Emergency Planning Zone \(DEPZ\)”](#) which now covers more homes and businesses in the local area, of Spencers Wood, Three Mile Cross and Grazeley, not previously included.
- A need to look, more comprehensively, at the impact of major employment nodes, e.g. the **RBFT** (you reference only their Reading operation), and its impact on the entire transport system upon which their staff and patients rely as they travel around and between sites (located across Berkshire/south Oxfordshire, not just in Reading). The NHS is the largest employer in Berkshire (circa 16500) and RBFT is the largest employer within the NHS in Berkshire (circa 5500 staff) – You need to be directly consulting this organisation.
  - The reference, “Access to the Royal Berkshire Hospital is particularly challenging...” is obvious to all those who use it and such generalisations add what? It isn’t helpful. We encourage the Borough to work with RBFT to discuss/agree what it can do to help in the short, medium and long term. For example, we understand that, currently, there is no space available on the main site to accommodate additional surface parking.
- Disappointed there isn’t a stronger reference *and emphasis* to the **importance and value of engaging business**, and business representative organisations like the TVCC, under the Partnerships and Stakeholders (page 11). TVCC is very keen to engage with the Borough and help by contributing to the development of policy, plans and strategies that ensure they are fit for purpose and meet the needs of business for sustainable growth, investment and employment.
- Whilst we welcome the references to the opportunities of **Connected and Autonomous Vehicles (CAVS)** we feel the Plan is rather passive in its approach and adoption of this technology. We would encourage a stronger and more active policy approach, whereby the Borough is a leader and a testbed for the technology application and scheme implementation/delivery. TVCC is aware, for example, of proposals by a consortia of near neighbour LEPs, developing a CAV proposal with the Department for International Trade (DIT), which we would encourage the Borough to consider being a part. There are also some in-region businesses doing some leading-edge and interesting things. Are you engaging these businesses? Are you engaged with near town locations such as Milton Keynes and the Connected Places Catapult to draw on best practice and innovation schemes that can be applied/tested across Reading (not just in regard CAVs we emphasise)?
- We have very strong objections to the demand management measures and proposals (RTS22) outlined, including workplace parking levy’s and road charging at peak hours. Whilst we support proposals that will deliver sustained higher standards of environmental well-being (e.g. air, noise and general pollution/emission levels) we question these in the context of, for example:
  - Statements indicating a *‘level of support for delivering demand management measures with 60% of respondents thought a charging scheme would be effective in reducing the number of private vehicles on the road’*. Who and how did the council consult and did this include direct engagement with business and business membership organisations like the Chamber? We don’t recall ever being consulted on such an important issue.

- Arguments that such proposals are ‘nothing short of a stealth tax on passengers’ and all road users, including private car and bus users.
- Transport proposals must be integrated. Your objectives, for applying these measures, include an aim to reduce peak demand and encourage travel by sustainable modes. These alternative modes of transport need to be put in place BEFORE you even consider introducing any demand management measures of this kind. Therefore, ensure delivery of the MRT; the WRLtH; London Heathrow expansion; Crossrail is open and fully operation and the additional road bridge crossing and so forth.
- Adapting to the Future – the future of the private motor vehicle will be very different by the end of the Strategy Plan period. How engaged is the Borough is working alongside manufacturers to understand what the future holds and how the Borough can be at the forefront of innovation (rather than applying heavy-handed ‘policies’) that can be argued would ‘do little’ for air quality, as diesel cars and vans were responsible for more than 70% of pollution-causing nitrogen oxide. See also our comments on COVID-19 below and ‘transformational impacts’.
- Reading Buses own a stock of buses. We were encouraged to read of the trial of the brand new full-electric (ADL style) bus. But does the company have a fully operational e-vehicle (or similar) stock that reduces pollution to a minimum. If not, what are the plans to implement?
- Have you considered the full implications of proposals on the commercial attractiveness of Reading in terms of both your existing business community and new inward investors looking at the UK, Berkshire and Reading as a destination of choice? These are investments that are likely to be in the 100’s of millions? Post COVID-19 and as we Exit the EU – ensuring the UK and Reading remains an attractive destination for business investment will – quite simply – at best not be helped by such proposals, at worst see Reading missing out of £millions of investment and the associated jobs that comes with this.
- We are asking for and recommend a full, and separate, independent analysis of such proposals – in direct consultation with business community within Reading/Berkshire and its catchment area.
- In Section 4.66, “the median age of 34 might suggest a present and increasing demand for high quality, affordable means of transport in and around Reading”. The current challenges with public investment in public transport is one of generating revenue sufficient to cover running costs and capital investment without increasing dependence upon subsidy from central government. Price is therefore a key component and it would be helpful for the Borough to provide more detail and indicate price points for fares and charging together with innovative ways of making them sufficiently flexible and easy to attract and retain users. The imposition of a tax, e.g. road charging (see above), amounts to a tariff on a preferred mode of transport and not an incentive to change to an alternative.
- Policy RTS 28 – Mobility Services etc. Does the Borough plan to involve its key local community delivery partners in the planning of such services? If so, how and when.
- Section 106 development funding. Will the application of such funding result in increasing the costs of new development across the Borough and, if so, how will it position Reading relative to the central government policy of “levelling-up” and the rebuilding, recovery of the economy post COVID-19 and as we exit the EU? As a town, and as a sub-region we must remain competitive.

### Prioritisation and Consultation

- **Prioritisation** - It is unclear to us how the Borough intends to prioritise its plan and delivery of its objectives; the RTS identifies seven key challenges and five objectives. It describes numerous initiatives, but we are unsure how these will be prioritised, particularly in the face of the financial challenges set out. It is both possible to justify so much and lose focus on achieving the most beneficial outcomes.



- We would find it extremely helpful for a better-defined timeline in terms of helping to plan the future development of major development proposals, such as the RBFT and TVSP proposals outlined above. For example, we understand that a new hospital development in Surrey has been able to work with various agencies to secure agreement for the extension of tramline access for the new site. What plans, if any, does the Borough have to facilitate similar multi-agency working and co-operation? We would also welcome clarity on the criteria for decision making.
- In addition to our comments in regard consulting the business community, we are concerned that whilst the RTS refers, within Communication and Engagement Policies, to an emphasis is on public **consultation** and on providers there is no indication of consultation and engagement with business community in general or on strategic engagement. The plan is based on a survey of 3000 responses. How comprehensive and representative was the survey sample to the population *and business community* represented in the Borough? We don't recall this membership organisation being consulted and none of our members, based in Reading, appear to have been consulted directly. This is emphasised, for example, by the table on page 147 which cross-references action plans to the five objectives - only 6/15 ticks and far less than each other objective. Work to be done perhaps (with partners like the TVCC)?

#### Additional Points

We would like to direct the Borough to TVCC's wider consultation responses on transport and infrastructure [HERE](#).

- Like the Borough Council we are **not reading the Reading Transport Strategy in isolation**.
- A **regional, integrated, approach is both wanted and advocated**, that meets the needs of business and can help deliver continued and sustained economic growth and prosperity.
- **Investing in the success** of the Thames Valley and delivering a resilient infrastructure network (rail, road, air, water, broadband, etc) that is future proofed a clear objective in achieving this objective.
  - We encourage you to refer to our consultation responses to other recent calls, most notably our response to the Transport Strategy for the SE consultation [HERE](#).

The integration of the Transport Strategy to the wider portfolio of Borough (e.g. Reading 2050), TVB-LEP (e.g. Local Industrial Strategy) and other stakeholder/partner (listed on page 11) that help **improve productivity and attract investment to grow the Reading and wider Thames Valley economy so we can better compete in the global marketplace** are most welcome. A 'connected' Thames Valley is one of six core themes, which are inter-linked and complementary, of the TVCC's [Business Manifesto](#) which we commend to you.

We have a proven expertise in helping co-ordinate and deliver **trade and inward investment** activity across the Thames Valley, with businesses in Reading contributing a significant part, adding to its position as a leading international business location and consistently one of the highest performing regions for inward investment outside of London. We remain focused on strengthening partnerships, helping to attract and retain investment, trade, jobs and people. Therefore, we agree with the consultation document that a key priority of the transport strategy should be to ensure that the network continues to facilitate and enable trade, improve business connectivity and provide access to international gateways.

Within the RTS, and more generally as a Borough, it is difficult to ascertain what role it sees for private and overseas investment? Foreign direct investment accounts for a material part of all economic activity in the RBC area and it would be helpful to have a clearer understanding of how the Borough genuinely intends to build upon these excellent

foundations to benefit the ideas described in the RTS (shifting investment into Reading from a 30+ mile radius isn't a sustainable plan).

The Borough does need to stay engaged with the Thames Valley's business community to establish and maintain a credible and achievable RTS which will bring clear benefits to all who rely on the region's transport network and in so doing drive the UK's true turbo-economy. By supporting the economy of the Thames Valley and wider South East, we would encourage the Borough to:

- **Build on the evidential advantages and strength of Reading** for sustained levels of quality inward investment.
- Promote **access to international markets for trade**. Ensure that access to our important nodes (e.g. London Heathrow and freight terminals such as Southampton) remains and we have a transport infrastructure that helps us remain fit for purpose and internationally competitive.
- Focus on the delivery of a **more sustainable approach to connectivity** in the region and work collaboratively with key stakeholders including the South East and England's Economic Heartland Transport Board's.
- **Maintain a long-term vision** and delivery strategy *and stick to it*, lobbying Government to ensure investment decisions are taken promptly, expedited efficiently and remain apolitical.

And finally, as your consultation page states, the Strategy was prepared prior to the **COVID-19 pandemic**. The Borough will, naturally, reflect – as we all are - on the challenges and opportunities the new way of working will bring. Early indications are that COVID may have a transformational impact on methods of working, volume and modes of travel. We look forward to being directly consulted on what amendments or changes may be made to the Strategy.

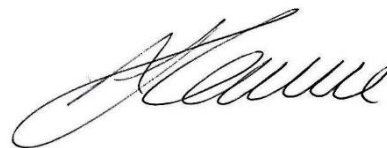
We thank you once again for the opportunity to comment on the Transport Strategy and we welcome every opportunity to not only be consulted, but to be involved as a key stakeholder in future work, helping to further shape and frame the town's transport plans.

We welcome Borough representation, through Councillors Jason Brock and Stuart Munro, on our Local Chamber Advisory Group (LCAG) and offer an open invitation to the team working on this Strategy to attend and present.

Yours sincerely,



**Paul Britton**  
**Chief Executive**  
**Thames Valley Chamber of Commerce**



**Andy Cowie**  
**Local President**  
**Reading & Wokingham Chamber of Commerce**

cc'd: Cllr Jason Brock, Leader of the Council (Reading BC) and Cllr Stuart Munro, Executive Member for Business and Economic Development (Wokingham BC)