

Planning Policy Team
Reading Borough Council
Bridge Street
Reading
RG1 2LU

Date: 14 June 2017
Our ref: 15037/DL/ZA/14003901v4
Your ref:

Dear Sir/Madam

Representations to Reading Borough Council Draft Local Plan in Respect of Land at Kentwood Hill, Tilehurst (Site refs. WR3t, WR3s and EB7Wu)

This letter forms representations to the Reading Borough Council (RBC) Draft Local Plan Consultation (April 2017) (hereafter the emerging plan) which are submitted on behalf of our client, Tilehurst Poor's Land Charity.

To inform these representations, the following documents are also being submitted:

- 1 Site Location Plan;
- 2 Draft Masterplan Option 1, drawing no. PS15691-002 prepared by Lichfields;
- 3 Draft Masterplan Option 2, drawing no. PS15691-003 prepared by Lichfields;
- 4 Ecological Appraisal Briefing Note prepared by Ecology Solutions;
- 5 Site Access Appraisal prepared by Systra; and
- 6 Initial Landscape and Visual Appraisal prepared by Aspect.

Background

The Tilehurst Poor's Land Charity was initially created to provide fuel for the poor of the Parish. Over time the Charity's aims have broadened to provide support for those in need within Tilehurst, with the provision of grants to local people to provide much needed items such as furniture, clothes or white goods. As the name suggests, the Charity owns land, some of which has been sold and the proceeds invested, so that the Charity's income comes from both investments and rents.

The Charity owns land at Kentwood Hill, Tilehurst, as shown on submitted Site Location Plan which, as we summarise below, has long been recognised as a potential development location.

The land ownership extends to 6.6ha in total and comprises the following land uses (which are identified on the Site Location Plan):

- 1 Builders Yard
- 2 Non-Statutory Allotments

- 3 Recreation Ground
- 4 Two areas of grass/scrubland
- 5 Tree filled area

The site is located in a residential area, less than 130 metres from the local centre (the Tilehurst Triangle) which provides a wide range of local services and amenities. It is well served by public transport and in close proximity to a number of facilities including schools and GP surgeries.

Given the site's location and proximity to services, as expanded upon below, it forms a highly sustainable location which is capable of providing much needed additional housing (including family housing) in Reading.

Site History

The site, other than the previously developed area (the builder's yard) is currently allocated as Public and Strategic Open Space under Policy SA16 of the RBC Sites and Detailed Policies Document. The tree filled part of the site is a Local Wildlife Site and Major Landscape Feature and includes a number of trees which are subject to Tree Preservation Orders.

The previously developed area of the site (the builder's yard) has previously been the subject of considerable discussion and analysis during the preparation of the Sites and Detailed Policies Document (SDPD) where it was initially identified for residential development for 11-17 dwellings (Policy SA8 of the draft SDPD). However, the allocation was excluded from the SDPD (adopted October 2012) upon the recommendation of the Inspector who considered it would result in piecemeal development that would not address the future of the wider site.

Specifically in relation to Policy SA8, the Local Plan Inspector stated:

"Both the site allocated in the DPD and the enlarged site advanced by the site owner would result in piecemeal development that is not well related to the surroundings. There would be uncertainty as to the future of surrounding parcels of land. A comprehensive approach is required that deals with all the land between Kentwood Hill and Armour Hill (including the builder's yard, unused land, the allotments, and playing field) having regard to the needs of the area. Consequently as this policy is not justified by the evidence and contrary to national planning policy it is unsound and should be deleted".

The Inspector's key consideration in resisting the allocation is that it represented piecemeal development and should instead have been considered holistically with the surrounding parcels of land (namely the recreation ground, allotments and scrubland/tree area). He did not question the overall suitability of this location for residential development – indeed the proposed allocations within the emerging Local Plan deliver the "comprehensive approach" sought by the earlier Local Plan Inspector.

Consideration of Site within the emerging Local Plan

Following the consideration of the site within the earlier SDPD process the site has been considered by RBC from the outset of the emerging Local Plan process.

Issues and Options Consultation (February-March 2016)

The site was identified within the Issues and Options (IOP) document which was consulted on in February-March 2016 as site A14: Allotments and Adjacent Land. The IOP identified a number of options for the future of the site including full development, partial development and no allocation. We submitted representations to the consultation on behalf of our client supporting the development of the site for residential development.

Housing and Economic Land Availability Assessment (April 2017)

The site has also been identified in the recent RBC Housing and Economic Land Availability Assessment (HELAA) (April 2017) as site KE008. The HELAA identifies that the site is available and potentially suitable for residential development with the allotment retained and residential development on the land at Kentwood Hill and Armour Hill.

Consultation with Reading Borough Council

Following our consultation response to the Issues and Options Document RBC have sought clarification on the development potential of the site. The clarifications provided by our client have led to the approach taken in the emerging Local Plan, which our client supports, of the recreation ground, allotments and tree filled areas being retained as open space, with the remaining areas of the site allocated for residential development.

Draft Allocation (April 2017)

The draft Local Plan splits the site into three proposed allocations two of which are for residential development (allocations WR3s and WR3t) and a proposed Local Green Space (policy EN7Wu). The emerging plan also identifies a tranche of land both within and beyond the site as an Area of Identified Biodiversity Interest and (Policy EN7 – see below) and a Major Landscape Feature (Policy EN 13). We comment further on these draft allocations below.

Principle of Development

Our clients support the principles and broad specifics of the draft allocations in relation to the site (namely allocations WR3s, WR3t and EN7Wu). In addition to RBC's evidence base and analysis (which underpins these allocations) the additional evidence base prepared and submitted by our clients (and expanded upon below) confirms the appropriateness of this location for residential development.

Housing Need

The emerging Local Plan notes that (para 4.4.1) *“there is a pressing need for additional housing in Reading and the surrounding area.”*

This reflects the Berkshire Strategic Housing Market Assessment (SHMA) (published February 2016) assessed the level of new housing required within RBC and the other Boroughs and Districts within the former Berkshire Authorities. This identified a full objectively assessed housing need for RBC of 699 homes a year. The adopted development plan pursues a lower annual housing target of 521 dwellings per year in the period 2016 – 2026 (policy CS 14) such that the emerging Local Plan requires a substantial uplift in housing delivery.

Draft Policy H1: Provision of Housing identifies that the emerging plan will make provision for at least an additional 15,134 homes (averaging 658 homes per annum) in the Borough for the period 2013 to 2036. This level of delivery means there will be a shortfall over the plan period of 943 dwellings against the objectively assessed need. The level of housing provision proposed within the emerging Local Plan means that RBC is not seeking to meet its housing needs in full within the Borough boundaries and will need to seek cooperation from the surrounding Boroughs.

In this context it is crucial that the proposed allocated sites are developed to their full potential (having regard to development management considerations) to ensure that the emerging Plan seeks the highest

achievable level of housing delivery. The emerging plan recognises this (para. 4.4.6) stating *“it is important that efficient use is made of the land that is available to boost the delivery of new homes.”*

Residential Density

In addition to the emerging Local Plan seeking an uplift in housing numbers it also seeks to address residential density (draft Policy H2). This identifies an indicative range of 30 – 60 dwellings per hectare (figure 4.5).

The emerging Local Plan also notes (policy H2) the need *“in particular for family homes of 3 or more bedrooms”* suggesting that on developments of 10 or more dwellings outside the central area *“over 50 % of dwellings will be three bedrooms or more, having regard to all other material considerations.”* The supporting text states (para 4.4.9) that *“there is a particular onus on those sites outside centres to help to meet the needs for family homes.”*

Our clients have prepared two indicative masterplans identifying alternative development routes (expanded upon below). These masterplans show an indicative density of between 29-32 dwellings per hectare with a focus on larger family housing.

Our clients support the allocation of the sites at Kentwood Hill and Armour Hill at the higher end of the proposed identified capacities (which are 62 and 18 respectively). This form and level of development both respects the sites context and surroundings and assists in contributing to the *“pressing need”* for additional residential development within Reading.

Specific Suitability and Accessibility of the Site

An initial Site Access Note has been prepared by Systra to accompany these representations to assess both the sustainability of the site and identify any potential highways implications relating to the proposed development of the site.

The sustainability analysis concludes that the site is located in a highly accessible location with a range of sustainable modes of transports, such as Premier (bus) Route 17, and comprehensive pedestrian/cycle links in and around Tilehurst and regular bus services to Reading Town Centre and Railway Station. A range of facilities, such a Tilehurst Railway Station, School Road local centre, Deacon Way Trading Estate and Park Lane School, are within an acceptable walking and cycling distance of the proposed development.

Indicative Masterplans

To help inform these representations, two draft masterplans have been prepared, showing how residential development could be accommodated on the site, both with (drawing 002) and without (drawing 003) the provision of flats. These masterplans have regard to the opportunities and constraints presented by the sites location including the trees subject to the Tree Preservation Orders (TPOs), the emerging policy context (see below) as well as the additional technical work undertaken by our clients.

Not only do both options result in an entirely appropriate form of development they would also result in development of an appropriate density and also provide a substantial level of family housing provision – a key objective of the local plan.

Transport

The initial site access note accompanying these representations concludes that there are no barriers to the delivery of access into the site. No transport or highway reasons have been identified as to why the site should not be brought forward for development.

Landscape

An initial Landscape and Visual Assessment has also been undertaken to accompany these representations. The accompanying report concludes that the sites of the part proposed for residential development are appropriate for this use from a landscape and visual perspective. It is considered that residential development could be integrated on the site without harm to the Major Landscape Feature Designation, the townscape setting or the receiving visual environment.

Ecology

As elements of the site currently form open space, an initial desk based ecological appraisal has been undertaken to assess if there are any ecological barriers to the development of the site. The report identifies that whilst the site has potential for some habitats, there are no overriding ecological constraints to the development of the site. It is recommended that the woodland area is retained (as proposed both by RBC within the draft allocations, supported by the landowners and reflected in both indicative masterplans). The report anticipates that further detailed surveys should be undertaken prior to the submission of a planning application.

Draft Policy Criteria – Residential Allocations

Proposed Policy WR3s – Land at Kentwood Hill states:

“Development for residential.

Development should:

- *Be supported by information showing how development fits within a comprehensive approach to the whole area (including W3t and the protection of the neighbouring allotments and recreations ground);*
- *Assess and mitigate and impacts of the Kentwood Hill/Norcot Road/School Road junction;*
- *Provide adequate footway/cycleway provision to link into existing routes;*
- *Include a landscaped border to Kentwood Hill;*
- *Provide for green links between the copse and the Victoria Recreation Ground, and between the copse and Kentwood Hill;*
- *Avoid adverse impacts on important trees including those protected by TPO;*
- *Avoid any detrimental impacts upon biodiversity, and provide for biodiversity net gain wherever possible;*
- *Avoid adverse visual impacts on the West Reading Wooded Ridgeline major landscape feature;*
- *Take account of potential archaeological significance; and*
- *Take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water, and make provision for upgrades where required.”*

The policy then goes on to identify a capacity of 41-62 dwellings on the 1.43ha site. Our clients support the proposed allocation of the site, and as set out below, consider a capacity of 62 dwellings to be an appropriate allocation.

Land at Armour Hill (WR3t)

Policy WR3t – Land at Armour Hill provides similar criteria to Policy WR3s with the following differences,

- Assess and mitigate any impacts on the Armour Hill/Kentwood Hill junction;
- Include a landscaped border to Armour Hill;
- No reference to the need for green links

The policy then goes on to identify a capacity of 12-18 dwellings on the 0.45ha site. Our clients support the proposed allocation of the site, and as set out below, consider a capacity of 18 dwellings to be an appropriate allocation.

Whilst the draft policy criteria within both allocations would be fully assessed at the planning application stage we have undertaken a review of this, informed by the technical work undertaken to date (including the illustrative masterplans) and anticipate that the requirements set out in the policy would be able to be met within any proposed development scheme, including a suitable access.

Open Space Allocations

Policy EN7 identifies areas of Local Green Space and Public Open Space, including the allotments and recreation ground and states:

“The following Local Green Spaces (LGS) and Public Open Space (POS), as shown on the Proposals Map, will be protected from development. Proposals that would result in the loss of any of these areas of open space, erode their quality through insensitive adjacent development or jeopardise their use or enjoyment by the public, will not be permitted.”

Our clients support the retention of the allotments and recreation ground as local green space/public open space.

The Woodland area of the site is proposed to be allocated as an Area of Identified Biodiversity Interest, which is referred to on the draft proposals map as Policy EN7, however a review of the draft Local Plan suggests the policy in relation to this allocation should be Policy EN12. Our clients would be very grateful for clarification on this point.

Other Policies in the Draft Local Plan

At this stage, we do not comment on the detailed development management policy criteria (including affordable housing provision) but our client reserves their position to do so within subsequent iterations of the emerging development plan as their initial proposals for the site evolve.

Summary and Conclusions

The Tilehurst Poor’s Land Charity supports the proposed draft allocations of the land at Kentwood Hill (namely sites WR3s, WR3t and EN7Wu) within the draft Local Plan. The site’s location within a sustainable location means it is suitable for this level and type residential development, whilst the allotment and recreation ground areas of the site are to be retained as open space.

Specifically the Charity support the residential allocation of the areas at Kentwood Hill and Armour Hill at the higher end of the proposed capacities identified (62 and 18 respectively). This means they would contribute to the “pressing need” for further housing in Reading and also provide a substantial level of additional family housing as sought by the emerging plan. The substantial level of technical work undertaken by the charity further supports the allocations and confirms that the specific requirements identified for both allocations are capable of being met.

We trust that these comments assist with the preparation of the Local Plan and would be happy to provide any clarifications which may be sought by the Local Planning Authority – please contact Zahra Alrashed or myself if you require any further information.

Yours faithfully



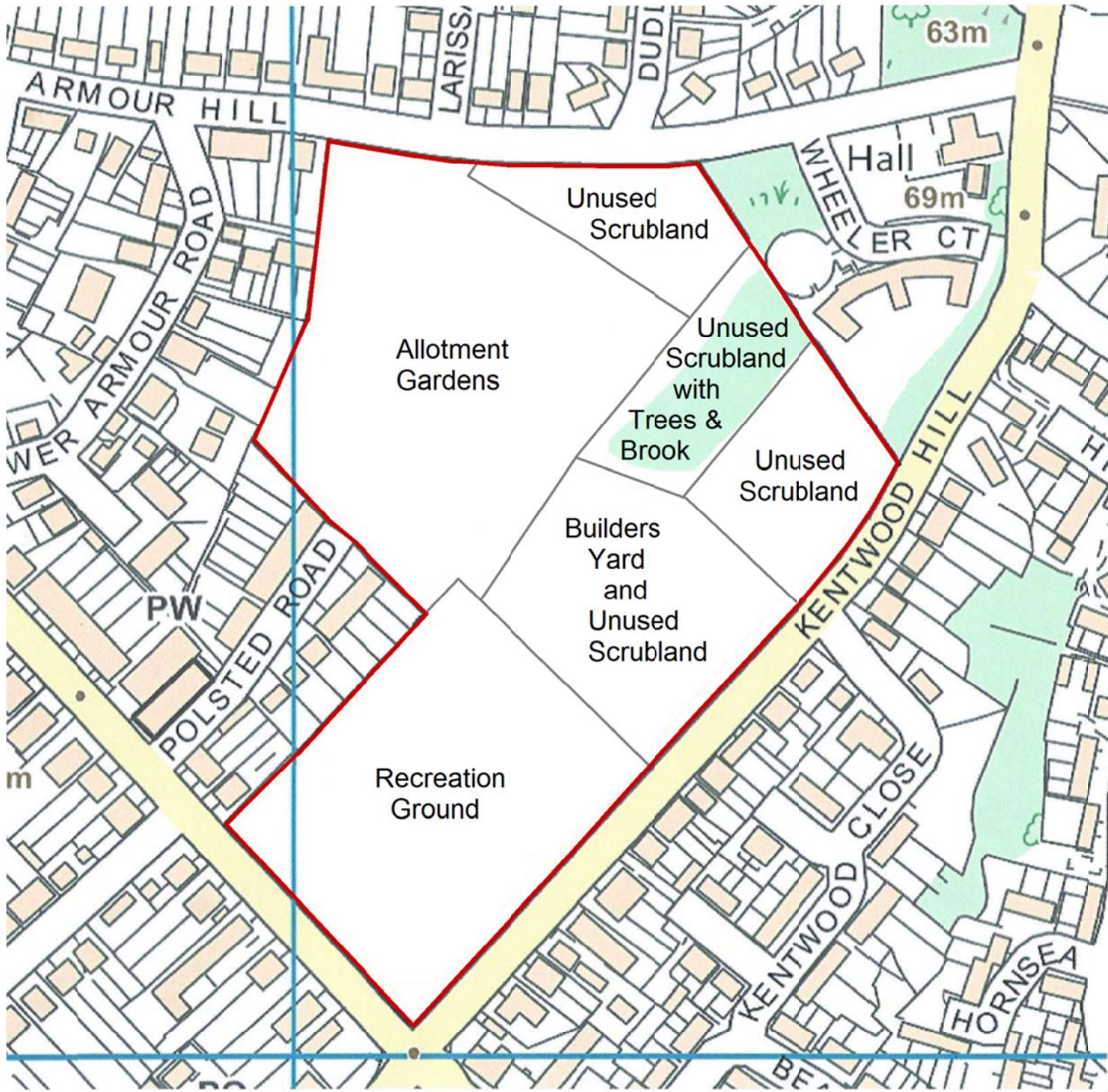
Daniel Lampard
Senior Director

Copy

C Cairns
R Duncan

-
-

Tilehurst Poor's Lands Charity
Chaney's Chartered Surveyors



Key:

- Candidate Site for Housing with some provision for community leisure space

Land at Kentwood Hill, Armour Hill, Polsted Road and Armour Road in Tilehurst, Reading

Landowner:
 Tilehurst Poor's Land Charity
 (Regd Charity No. 204048)

Drawing:
 Site Location Plan

Scale:
 Approx 1:2000 @ A3

Date:
 October 2015



Key

Site Boundary



Project Kentwood Hill

Title Indicative Sketch Layout

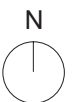
Client Tilehurst Poor's Land Charity

Date 27.02.2017

Scale 1:1000 @ A3

Drawn by LH

Drg. No PS15691-002



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UD/CL15691



Key

Site Boundary



Project Kentwood Hill

Title **Option 2: Indicative Sketch Layout**

Client Tilehurst Poor's Land Charity

Date 01.03.2017

Scale 1:1000 @ A3

Drawn by LH

Drg. No PS15691-003



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7385: LAND AT KENTWOOD HILL, TILEHURST, READING,

BRIEFING NOTE: ECOLOGICAL APPRAISAL

Introduction

1. Ecology Solutions was commissioned in February 2017 by Lichfields to undertake an ecological appraisal of the site Land at Kentwood Hill, Tilehurst, Reading (see Plan ECO1).
2. This wider site is proposed for a range of uses within the emerging Reading Local Plan. This includes a new residential development with associated infrastructure and landscaping (allocations WR3s and WR3t) as well as for Local Green Space (allocation EN7Wu). Parts of the site are also identified as an Area of Identified Biodiversity Interest (Policy EN7) and a Major Landscape Feature (Policy EN13).
3. The site is situated in Tilehurst Reading approximately 4 miles west of Reading Town Centre. The surrounding area is predominately residential development. The site is bounded by residential properties and gardens.
4. The wider site currently comprises allotment gardens, scrub, woodland, hardstanding (builder's yard) and recreation ground.

Survey Methodology

5. In order to compile background information on the site and the surrounding area, Ecology Solutions contacted Thames Valley Environmental Records Centre (TVERC).
6. Further information on designated sites from a wider search area was obtained from the online Multi-Agency Geographic Information for the Countryside (MAGIC)¹ database, which uses information held by Natural England and other organisations.
7. Google Earth and Bing aerial images were also used to gain an understanding of the habitats present on site.

Designated Sites

8. There are no statutory designations of nature conservation value within the site or immediately adjacent to it.

¹<http://www.magic.gov.uk>

9. The nearest statutory site is Mclloy Park Local Nature Reserve (LNR), approximately 0.4km east of the site. It is separated from the site by residential buildings. There is no likelihood of any adverse effect upon the LNR as a result of the proposed development. The site contains ancient woodland and grassland.
10. An additional three LNRs are located within 1km of the site to the south east. Owing to the existing development between the site and LNRs there is no likelihood of any adverse effects on the LNRs as a result of any proposed development.
11. The nearest Site of Special Scientific Interest (SSSI) is Pincents Kiln, located approximately 2.8km south west of the site. However this SSSI is designated for its geological interest rather than its ecological interest.
12. The nearest SSSI designated for its ecological interest is Sulham and Tidmarsh Woods and Meadows located approximately 2.9km west of the site. This site is designated for its mosaic of damp copses and seasonally flooded meadow communities, as well as the rich invertebrate fauna these habitats support. Given the existing intervening development it is not likely that there would be any direct adverse effect upon this SSSI as a result of the development of the site.
13. There are no non-statutory designated sites within or immediately adjacent to the site. The closest Local Wildlife Site (LWS) is Mclloy Park, Tilehurst. This site is also designated as a LNR (see above) and is located approximately 0.4km east of the site.
14. A number of further non-statutory sites as well as ancient woodland sites are located in the wider areas as shown on Plan ECO1, but no significant adverse effects are anticipated as a result of the development of the site.

Habitats

15. To gain an understanding of the habitats present on site Ecology Solutions contacted TVERC, referred to MAGIC as well as Google Earth and Bing. The main habitats were identified and are considered below. The location of these habitats can be seen on Plan ECO2.
16. The wider site comprises allotment gardens, scrub, woodland, hardstanding (builder's yard) and recreation ground.
17. **Allotment Garden** is located in the northern half of the site. It is bounded by the woodland to the east and south and housing and garden to the north and west.
18. **Scrub** is also located in the northern half of the site. The scrub appears to be largely unmanaged and as a result has become very dense. Using Google Street View it appears that the scrub area is dominated by Bramble *Rubus fruticosus* and semi-mature trees.
19. **Woodland** is located in the eastern area of the site. This woodland is classed as a priority habitat, as such is protected under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006, as well as a degree of policy protection under the National Planning Policy Framework. The woodland appears to be a mix of deciduous mature trees and mature scrub species. A small brook is located within the woodland.

20. **Hardstanding** is located to the south of the woodland. It is currently being used as a builder's yard, and as a result offers little ecological value.
21. A **Recreation Ground** located in the southern area of the site is bounded by a tree line. The grassland appears to be managed as a football ground and as a result is unlikely to support any notable grassland species.
22. A full extended Phase 1 habitat survey would be required to inform a planning application. On the current evidence the woodland is the habitat of greatest ecological interest. It is recommended that it be retained and provided with an appropriate buffer zone and the proposals map of the emerging Local Plan reflect this. While it is not ancient woodland it is classed as a priority habitat.

Species

23. A number of records were returned by the data for protected species. The habitats present also have potential to support some protected species.

Bats

24. All bats are protected under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) and included on Schedule 2 of the Conservation of Habitats and Species Regulations 2010 (as amended; "the Habitats Regulations"). These include provisions making it an offence:
- Deliberately to kill, injure or take (capture) bats;
 - Deliberately to disturb bats in such a way as to:-
 - (i) be likely to impair their ability to survive, to breed or rear or nurture their young; or to hibernate or migrate; or
 - (ii) affect significantly the local distribution or abundance of the species to which they belong;
 - To damage or destroy any breeding or resting place used by bats;
 - Intentionally or recklessly to obstruct access to any place used by bats for shelter or protection (even if bats are not in residence).
25. The words deliberately and intentionally include actions where a court can infer that the defendant knew that the action taken would almost inevitably result in an offence, even if that was not the primary purpose of the act.
26. The offence of damaging (making worse for the bat) or destroying a breeding site or resting place is an absolute offence. Such actions do not have to be deliberate for an offence to be committed.
27. In accordance with the Habitats Regulations the licensing authority (Natural England) must apply the three derogation tests as part of the process of considering a licence application. These tests are that:
1. the activity to be licensed must be for imperative reasons of overriding public interest or for public health and safety;
 2. there must be no satisfactory alternative; and
 3. the favourable conservation status of the species concerned must be maintained.

28. Licences can usually only be granted if the development is in receipt of full planning permission.
29. A number of records were returned for the following bat species: Leisler's Bat *Nyctalus leisleri*, Noctule *Nyctalus noctula*, Common Pipistrelle *Pipistrellus pipistrellus*, Soprano Pipistrelle Bat *Pipistrellus pygmaeus*, Brown Long-eared Bat *Plecotus auritus*, Pipistrelle sp *Pipistrellus* sp., Long-eared sp *Plecotus* sp., and unidentified bat species. The closest records are for Leisler's Bat, Noctule, Soprano Pipistrelle, Common Pipistrelle, Brown Long-eared bat, Long-eared bat species, as well as an unidentified bat species. These were all recorded in 2013 approximately 50m south of the site.
30. There are no buildings within the site that could offer opportunities for roosting bats. The woodland present on site may contain trees that may be suitable for roosting bats. The scrub, allotment gardens and woodland within the site could offer some foraging opportunities. It is therefore recommended that bat activity surveys are undertaken. These can take place between May and August / September, and would establish if bats are utilising the site for foraging or commuting. An assessment of all trees within the site should be undertaken to inform the need for further work. Survey work should be completed prior to a planning application.

Badgers

31. Badgers *Meles meles* are protected by the Protection of Badgers Act 1992, for reasons of animal welfare rather than on account of their intrinsic rarity or nature conservation significance.
32. A total of 12 records for Badger were returned by the data search. The closest and most recent record for Badger was recorded in 2015 approximately 50m south of the site.
33. The site is considered to offer suitable foraging and commuting opportunities for Badgers, and therefore their presence on site cannot be ruled out. The woodland has potential to contain Badger setts. A full Badger survey would be required to inform a planning submission.

Other Mammals

34. In addition to Badger records, eight records for Hedgehog *Erinaceus europaeus* were returned. The closest and most recent record was recorded in 2014 approximately 0.3km west of the site.
35. Hedgehog is listed as a Species of Principal Importance under Section 41 of the NERC Act 2006. The NERC Act places responsibility upon public bodies to have regard for the conservation of biodiversity in England.
36. The habitats within the site are suitable for Hedgehogs. It would be recommended that opportunities be retained as part of any development, and that ground cover be cleared outside of the winter hibernation period.

Birds

37. Section 1 of the Wildlife & Countryside Act 1981 (as amended) is concerned with the protection of wild birds. With certain exceptions all wild birds and their eggs

are protected from intentional killing, injuring and taking, and their nests, whilst being built or in use, cannot be taken, damaged or destroyed.

38. Schedule 1 part 1 of the Wildlife & Countryside Act 1981 is a list of the nationally rarer and uncommon breeding birds for which all offences carry special (i.e. greater) penalties. These species also enjoy additional protection whilst breeding, as it is also an offence to disturb adults or their dependant young when at the nest.
39. The woodland and scrub on site as well as the tree line around the boundary of the site offers opportunities for nesting birds.
40. The only protected bird species record returned is for Red Kite *Milvus milvus*, recorded in 2009 approximately 0.8km south west of the site.
41. While a full breeding bird survey is unlikely to be required to inform a planning application, an appraisal of use by bird species during a site visit would be necessary.

Reptiles

42. All six British reptile species receive a degree of legislative protection that varies depending on their conservation importance.
43. Rare, endangered or declining species receive 'full protection' under the Wildlife and Countryside Act 1981 (as amended) as well as protection under the Conservation of Habitats and Species Regulations 2010 (as amended). Species that are fully protected are Smooth Snake *Coronella austriaca* and Sand Lizard *Lacerta agilis*. These receive the following protection from:
 - Killing, injuring, taking;
 - Possession or control (of live or dead animals, their parts or derivatives);
 - Damage to, destruction of, obstruction of access to any structure or place used for shelter or protection;
 - Disturbance of any animal occupying such a structure or place; and
 - Selling, offering for sale, possession or transport for purposes of sale (live or dead animal, part or derivative).
44. Owing to their abundance in Britain, Common Lizard, Slow Worm, Grass Snake and Adder *Vipera berus* are only 'partially protected' under the Wildlife and Countryside Act 1981 (as amended) and as such only receive protection from:
 - Deliberate killing and injuring;
 - Being sold or other forms of trading.
45. Therefore, if reptiles are present within a site, a scheme of translocation can be implemented to avoid the offence of killing / injury.
46. A total of 23 records for Slow Worm *Anguis fragilis* were returned by the data search. Of these records, five were recorded from within the site, the most recent of which dates from 2013.
47. A single Grass Snake *Natrix natrix* record was also returned. This record dates from 2008 from a location approximately 0.6km south of the site.

48. Owing to the habitats on site in conjunction with the records of Slow Worm being present, it is recommended that a presence / absence survey be undertaken between the months of April and September / October inclusive. Artificial refugia would be deployed in areas of suitable habitat and subject to periodic checks on seven occasions. This would be required prior to any planning application.
49. In the event that the presence of reptiles species was confirmed (as is likely), a translocation exercise would be required prior to any development of the site. A suitable receptor area would need to be identified, and potentially be subject to enhancement and management. Such a receptor area would be within the site or in the local area.

Amphibians

50. Great Crested Newts are subject to the same legislative protection and licensing provisions as bats (see previous).
51. Other species of amphibian including the Common Toad *Bufo bufo*, Common Frog *Rana temporaria*, Palmate Newt *Lissotriton helveticus* and Smooth Newt are all afforded protection against sale only under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended). Where significantly large populations of Common Toad are identified at a site their presence could be deemed as a 'material consideration' by planning authorities in accordance with National planning Policy Framework (NPPF) and their listing on the UK Biodiversity Action Plan (UKBAP) currently referred to as Priority Species, and measures to protect them recommended.
52. The site contains suitable terrestrial habitat for amphibians. There is also a small brook located within the woodland of the site.
53. No recent records for Great Crested Newt were returned by the data search.
54. However the following records for other amphibian species were returned.
55. A total of 13 records for Smooth Newt *Lissotriton vulgaris* were returned. The closest of which was recorded in 2007 0.5km north of the site. The most recent record dates from 2013 and was recorded approximately 1.3km north of the site.
56. Seven records for Common Toad were returned the most recent and closest record was recorded in 2013 approximately 1.2km north of the site.
57. A total of 40 records were returned for Common Frog *Rana temporaria*; the closest records are from a location approximately 0.3km west of the site. The most recent record dates from 2013, recorded in a location approximately 0.5km west of the site.
58. Owing to the habitats on site and the lack of Great Crested Newt records returned, it is considered that specific surveys for this species are not required.

Invertebrates

59. Given the habitats present it is likely a small assemblage of common invertebrate species would be present within the site. However, there is no evidence to suggest that any rare or notable species would be present.

60. TVERC returned the following records for invertebrates, 31 records for Stag Beetle *Lucanus cervus* were returned by the data search. The most recent records for this species were recorded in 2014 approximately 0.5km west of the site. The closest was recorded approximately 0.2km west of the site in 2007. A single record for a Depressed River Mussel *Pseudanodonta complanata* was recorded in 2012 approximately 1km north of the site. A single record for a True Fly *Villa cingulate* was recorded in 2011 approximately 1.8km north of the site.
61. Owing to the close proximity of records for Stag Beetle as well as the habitats within the site, it is likely this species will be present on site. This species is listed as a Species of Principal Importance under Section 41 of the NERC Act 2006. The NERC Act places responsibility upon public bodies to have regard for the conservation of biodiversity in England. Enhancements for Stag Beetle would be recommended as part of any development, but a full survey is unlikely to be necessary.

Summary

62. Ecology Solutions was commissioned in February 2017 by Lichfields to undertake an ecological appraisal of the site Land at Kentwood Hill, Tilehurst, Reading (Plan ECO1).
63. This wider site is proposed for a new residential development with associated infrastructure and landscaping with the residual land identified as a Local Green Space, as well as an Area of Identified Biodiversity Interest and a Major Landscape Feature.
64. The site is situated in Tilehurst Reading approximately 4 miles west of Reading Town Centre. The surrounding area is predominately residential development. The site is bounded by residential properties and gardens.
65. A desk-based study was undertaken, to gain an understanding of the habitats present and species the site may support.
66. **Statutory Sites** Information obtained is to the effect that there are no statutory designated sites within or directly adjacent to the site. Statutory sites in the locality are not likely to be affected adversely by the proposed development.
67. **Non-statutory Sites** There are no non-statutory designated sites within or immediately adjacent of the site.
68. Several non-statutory designations as well as ancient woodland are located in the vicinity, but no significant adverse effects are anticipated as a result of the development of the site.
69. **Habitats** The habitats within the site are common and widespread and of no intrinsic ecological interest, with the exception of the woodland within the site which is classed as priority habitat. It is understood that the area of scrub, trees and brook will not be developed (as reflected in its proposed allocation). The removal of the other habitats is of no significance. It is recommended that the landscape strategy for the proposed development incorporate native species of local provenance, and those of known value to native wildlife in the landscape strategy wherever possible.

70. **Protected Species** A number of protected species records were returned by the data search. Owing to five records of Slow Worm being recorded within the site it is recommended that reptile presence / absence surveys are undertaken. In the likely event that reptiles are present a translocation exercise will be required. The chosen receptor site may be subject to enhancements and management. In addition to reptile surveys it is also recommended that bat activity surveys are undertaken to establish if bats are using the site, trees on site will also be subject to an assessment. A full Badger survey will also be required.
71. Recommendations for mitigation include new planting with native species, to provide foraging and nesting habitats for bird species. These measures would deliver benefits for nature conservation in the locality.
72. Overall, the site is not subject to any statutory or non-statutory nature conservation designation. The site does offer some potential for common reptile species as well as opportunities for bats, Badgers, nesting birds, Hedgehogs and Stag Beetles. Nevertheless with good design it is considered that adverse effects on these species can be avoided or adequately mitigated. On the current evidence there are no overriding ecological constraints to the development of the site.

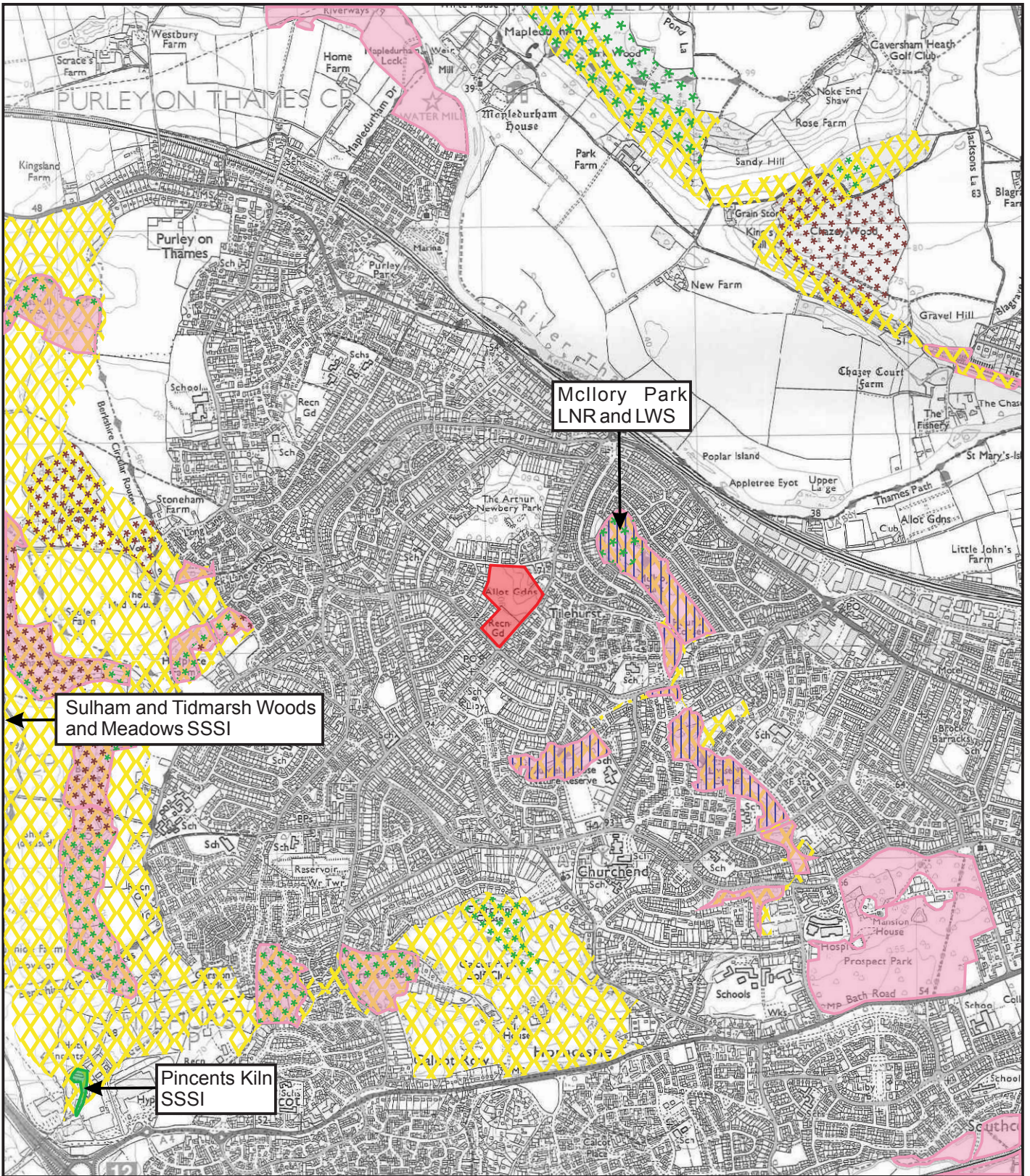
Plans:

- ECO1 Site Location and Ecological Designations
- ECO2 Aerial Photograph of Site

PLANS

PLAN ECO1

Site Location and Ecological Designations



KEY:

- SITE LOCATION
- SITE OF SPECIAL SCIENTIFIC INTEREST (SSSI)
- LOCAL NATURE RESERVE (LNR)
- LOCAL WILDLIFE SITE (LWS)
- CONSERVATION TARGET AREA
- ANCIENT & SEMI-NATURAL WOODLAND
- ANCIENT REPLANTED WOODLAND



7385: LAND AT KENTWOOD HILL,
TILEHURST, READING


PLAN ECO1: SITE LOCATION AND
ECOLOGICAL DESIGNATIONS

PLAN ECO2

Ecological Features

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KEY:
 SITE BOUNDARY



7385: KENTWOOD HILL,
TILEHURST, READING

PLAN ECO2:
AERIAL PHOTOGRAPH OF SITE



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e c o l o g y s o l u t i o n s f o r p l a n n e r s a n d d e v e l o p e r s

PROPOSED RESIDENTIAL DEVELOPMENT,
LAND AT KENTWOOD HILL,
TILEHURST

Initial Landscape and Visual Appraisal

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PLAN ASP1	SITE LOCATION PLAN
PLAN ASP2	SITE AND SETTING

APPENDICES

APPENDIX 1	PHOTOGRAPHIC RECORD
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1. INTRODUCTION

- 1.1. Aspect Landscape Planning Ltd has been instructed by the Tilehurst Poor's Land Charity to review the landscape and visual matters relating to the development of land for residential use at Kentwood Hill, Tilehurst. The location of the site is illustrated on Plan ASP1.
- 1.2. The site has been identified as capable of accommodating residential development within the emerging Local Plan. The purpose of this LVA is to inform the emerging policy in terms of the potential development of the site from a landscape and visual perspective.
- 1.3. This Landscape and Visual Appraisal is not a detailed Landscape and Visual Impact Assessment (LVIA) but seeks to introduce the principle of development into the context of the existing landscape character, visual environment and landscape related policy and suggest recommendations in relation to strategic landscape and visual matters should the site be taken forward as part of the Reading Borough Local Plan.
- 1.4. This assessment should be read alongside the other accompanying material submitted with these representations.

2. BASELINE ASSESSMENT

Site and Setting Overview

- 2.1. The site is located within Tilehurst which is a suburb within the north western part of Reading, refer Plan ASP1 Site Location. The plan illustrates the sites location within the wider urban area on the southern side of the Thames Valley.
- 2.2. The wider site comprises several different parcels of land, which include the Victoria Recreation Ground, an area of allotments, a builder's yard, a mature woodland and areas of scrub. Not all of the site is proposed for residential development as a substantial part is proposed as a Local Green Space. In addition, part of the site identified as an Area of Identified Biodiversity Interest (Policy EN7) and a Major Landscape Feature (Policy EN13). Plan ASP2 (Site & Setting) illustrates the key components of the site and its immediate setting. The site is contained to the north, south east and south west by road corridors and to the west by residential built form and associated gardens. The urban setting of the site means that middle and longer distance views are contained by the localised built form. The boundaries that front onto the streetscenes are defined by established vegetation which creates a degree of separation between the internal parts of the site and the adjoining road corridors and residential areas that front these roads.

Topography

- 2.3. The site is located on the northerly aspect slopes of the Thames Valley, which runs broadly east – west, to the north of the urban area. The recreation ground is broadly flat, with the land starting to fall from its north eastern boundary. From this part of the site, the land falls to the north east from around 90m AOD, down to approximately 75m on the north eastern boundary of the site, adjacent to Wheeler Court. The land continues to fall to the north east until it reaches the Thames flood meadows at around 38m AOD. Plan ASP1 illustrates the topography of the wider setting of the site.

Public Rights of Way

- 2.4. There are no formal public rights of way across the site, although the Victoria Recreation Ground is open to the public and there appears to be access to the

allotments within the northern part of the site. The areas of scrubland, woodland and brook and the builder's yard are not publicly accessible.

Landscape Related Policy

- 2.5. The development plan for the site includes the Adopted Reading Borough Local Plan which will be superseded in due course by the emerging Local Plan. The site is not subject to any national or local qualitative landscape designations.
- 2.6. Much of the site is identified in the current Local Plan as an area of Public and Strategic Open Space under Local Plan Policy SA16 and that the woodland and brook within the north eastern part of the site are designated as a Major Landscape Feature (Policy CS37). A smaller element of the site is then identified as a Local Green Space under allocation EN7 within the emerging Local Plan, as well as the designation relating to Biodiversity Interest and the Landscape Feature summarised subsequently. These policies seek the protection of these features from inappropriate development.

Landscape Character

- 2.7. To assess the landscape character of the site, a detailed desk study of published character assessments has been carried out. This review informed the field observations of the site visit to ensure a comprehensive approach to the assessment.
- 2.8. It is noted that the sites location within the main urban area of Reading means that there is no published assessment of landscape or townscape character at a Borough-level that covers the site.
- 2.9. In terms of the wider landscape character, within the Natural England National Character Assessment, the site is located within the Chilterns character area (NCA110).

Aspect Landscape Character Appraisal

- 2.10. Aspect has undertaken a high-level assessment of the site and its immediate townscape setting. The site comprises a number of land parcels within the main

urban area of Tilehurst which forms part of the wider Reading settlement. The site is currently largely open in nature, although the north eastern parts of the site are not readily appreciable from the localised public realm.

- 2.11. The site can be broken down into several different parcels: Victoria Recreation Ground; allotments; builder's yard; woodland; and areas of scrub. The external boundaries are characterised by established vegetation which contains views into much of the site and forms a defined edge to the site. The planting around the recreation ground comprises a formal hedgerow and line of mature lime trees. Views into this part of the site are more readily available. The vegetated character of the site is considered a positive feature within the townscape context of Tilehurst, breaking up the built environment and creating vegetated streetscenes along Kentwood Hill and Armour Hill. The streetscenes of Kentwood Hill, Armour Hill and Armour Road are characterised by residential development which creates a hard built edge on the opposite side of the road corridor to the boundaries of the site.
- 2.12. The recreation ground is characterised by the formal planting around the boundaries and a large area of managed, amenity grassland. The allotments, typical of such a land use, are characterised by a variety of garden sheds and garden paraphernalia located around a geometric network of vegetable plots. The builder's yard is characterised by a collection of functional buildings and areas of surface storage. The woodland runs broadly north east - south west from Wheeler Court, towards the recreation ground. Mature trees dominate this area through which passes a small brook. The areas of scrubland, located to the north west and south east of the woodland comprise overgrown areas of bramble and ruderal plants. The scrubland does not contain any internal features of landscape merit.
- 2.13. It is acknowledged that while the site will have some intrinsic value applied by local residents who overlook the area, the northern parts of the site are not readily perceived as a result of the established vegetation that defines the boundaries and the lack of public access and, as such, the areas of scrubland are not readily appreciable. The areas of scrub are considered to be of limited landscape value and are not considered to represent valued landscapes in relation to paragraph 109 of the NPPF.
- 2.14. The Recreation Ground and Allotments are clearly well-used community facilities and as such are of some value within the localised townscape setting. The wooded

copse in the north eastern part of the site is also acknowledged as contributing to the wooded slopes character of the wider Thames Valley, and has some local value, particularly from a biodiversity perspective, however, none of these parts of the site are considered particularly rare or of such value that they should be subject to any national or local landscape designations, nor are they identified for development within the emerging Local Plan.

Visual Environment

- 2.15. In order to assess the visibility of the site, a number of photographs have been taken from publicly accessible viewpoints, to illustrate the visual environment within which the site is set. Whilst the assessment is not exhaustive, it is considered that the views provide a fair representation of the site's visibility within the localised and wider visual environment. The Photographic Record is included within Appendix 1.
- 2.16. Viewpoints A and B are internal to the site and illustrate the recreation ground and allotment uses within the southern and western parts of the site respectively. The views illustrate two key community features associated with the site, which provide important formal and informal recreation opportunities as well as a breathing space within the wider urban area. Viewpoint A shows how the mature vegetation structure associated with the site and its immediate setting contain longer distance views to the north east from across the Thames Valley. Within Viewpoint B, the mature lime trees that line the recreation ground are evident on the skyline, forming key landscape features within the localised townscape context. These two areas are the only publicly accessible parts of the site.
- 2.17. Views 1 – 3 illustrate the views of the south eastern boundary along Kentwood Hill, while Views 4 and 5 illustrate the northern boundary along Armour Hill. These views illustrate the mature vegetation structure that characterises these streetscenes and create a degree of visual containment and separation with the site. This planting contributes to the character of the local area, breaking up the built environment within the wider urban setting.
- 2.18. View 6 is taken from Armour Road and illustrates the south western boundary. The mature treescape associated with the recreation ground is evident, as is the hard built edge that surrounds the recreation ground to the south east and south west,

overlooking the amenity space. The mature trees form key landscape features within this townscape setting.

- 2.19. As an overview, the visual assessment identifies that views of the site are localised to the streetscenes immediately adjoining the site. The existing built environment and mature vegetation structure that characterises the immediate townscape setting contain middle and longer distance views, with the vegetation forming notable landscape features within the townscape setting.

3. SUMMARY AND RECOMMENDATIONS

- 3.1. The assessment identifies that the site is located within an urban context but incorporates a number of key landscape features which are of merit and contribute to the localised townscape setting, breaking up the built environment. The wooded area within the north eastern part of the site forms part of a wider network of woodlands that characterise the Thames Valley slopes and break up the various residential estates that characterise Tilehurst.
- 3.2. The visual assessment identifies that views of the site are highly localised to the immediate context and those areas which are not publicly accessible are not readily appreciable. The internal components of these areas do not contribute to the localised or wider visual environment. The boundary vegetation is a key feature, defining the adjoining streetscenes and creating a compartmentalised character.
- 3.3. The Victoria Recreation Ground and allotments are key features within the site and the local community, providing opportunities for formal and informal recreation within the wider urban area. The designation of the woodland and watercourse in the north eastern part of the site due to its contribution to the wider wooded slopes landscape character is also acknowledged.
- 3.4. It is considered that the site presents the following constraints:
- Well-used and publicly accessible community features: Victoria Recreation Ground and allotments;
 - The presence of a Local Wildlife Site and Major Landscape Feature, focussed on the woodland and watercourse within the north eastern part of the site;
 - Local topography, with the land falling to the north, towards the Thames Valley; and
 - Overlooking residential properties to the south east, south west and north west.
- 3.5. Despite the identified constraints above, it is considered that parts of the site could accommodate residential development without significant harm to the prevailing character, visual environment or existing policy designations. The site is located within an urban context and as such the introduction of residential development within the site will not introduce alien features which are at odds with the immediate

setting. Furthermore, the degree of enclosure created by the boundary vegetation creates a significant degree of separation between certain parts of the site and their townscape context. It is recommended that the Victoria Recreation Ground and Allotments are retained in their current form. In addition, given the ecological importance of the woodland and watercourse, it is considered that these areas should be excluded from any future development proposals consistent with the draft allocation within the emerging Local Plan. However, as set out below, subject to the adoption of a sensitive approach to the development, it is considered that there are opportunities to successfully integrate development into the site.

Proposed Development Considerations

3.6. Given the above appraisal, it is considered that the builder's yard and area of scrubland to the north east, and the area of scrubland to the north east of the allotments (outlined in orange on Plan ASP2), present opportunities for the provision of residential development without significant harm to the receiving landscape and visual context. It is considered that development within these areas should adopt a landscape-led approach to the design development of any proposals and should incorporate the following suggested guidelines:

- **Major Landscape Feature & Local Wildlife Site** – Proposed development to the north west and south of these designations should incorporate an appropriate landscape buffer between the woodland and any proposed built form. These landscape buffers can incorporate native tree, shrub and grassland planting that will contribute to the local biodiversity and create a sympathetic transition between the proposed built environment and the neighbouring designation.
- **Community Facilities** – The allotments and recreation ground should be retained as part of any development, with proposals incorporating a landscape buffer to the boundaries of any proposed development to create an appropriate transition between the land uses.
- **Topography** – Proposed built form should be located on the slopes of the valley rather than the plateau within the southern part of the site to avoid appearing prominent within the wider setting. The retention of the recreation ground will ensure that this is achieved. Any development should look to work with the existing topography and avoid the use of prominent engineering solutions such as retaining walls and embankments.

- **Layout** – The proposals should seek to work with the existing levels within the parcels, with spine roads and access working across the slopes, where possible, reflecting the more recent residential areas within the wider townscape setting. Spine roads should include opportunities for street tree planting which, as it matures, will break up the perceived built environment. While access to formal recreation and allotments is available, proposals within the site should also provide opportunities for play and informal recreation. Where possible, proposed properties should adopt an “outward looking” approach where the development abuts the recreation ground and designated woodland. Not only will this ensure that the proposals integrate with the existing land uses, rather than turning their backs on them, it will also provide a degree of passive surveillance to these areas, discouraging antisocial behaviour.
- **Materials** – The proposed built form should incorporate a considered and sympathetic palette of materials that has been informed by the existing townscape setting around Kentwood Hill and Armour Hill. This will ensure that the proposals complement the receiving urban area and appear as a natural addition to the localised townscape.
- **Existing vegetation** – the mature hedgerows and trees associated with the boundaries of the identified parcels should be retained as part of the proposals and an appropriate management regime established. The retention of these features will ensure that the vegetated streetscenes that abut the site are maintained and appropriate transitions between any proposed development and the other land uses associated with the site are achieved. The established nature of this planting will also ensure that a mature landscape setting for the proposed built environment is achieved.
- **Proposed planting** – Any proposed development within the site should incorporate a comprehensive scheme of landscaping that reinforces the existing boundary planting, breaks up the proposed built environment and creates a high quality setting for the development. The proposed landscaping should include an appropriate mix of native and ornamental species to create biodiversity enhancements and year-round visual interest. Where the proposals abut the Local Wildlife Site an appropriate mix of native planting should be incorporated to ensure that a sympathetic transition is achieved.
- **Green Infrastructure** – Proposals should incorporate an appropriate mix of public open space and incidental spaces that will not only contribute to local

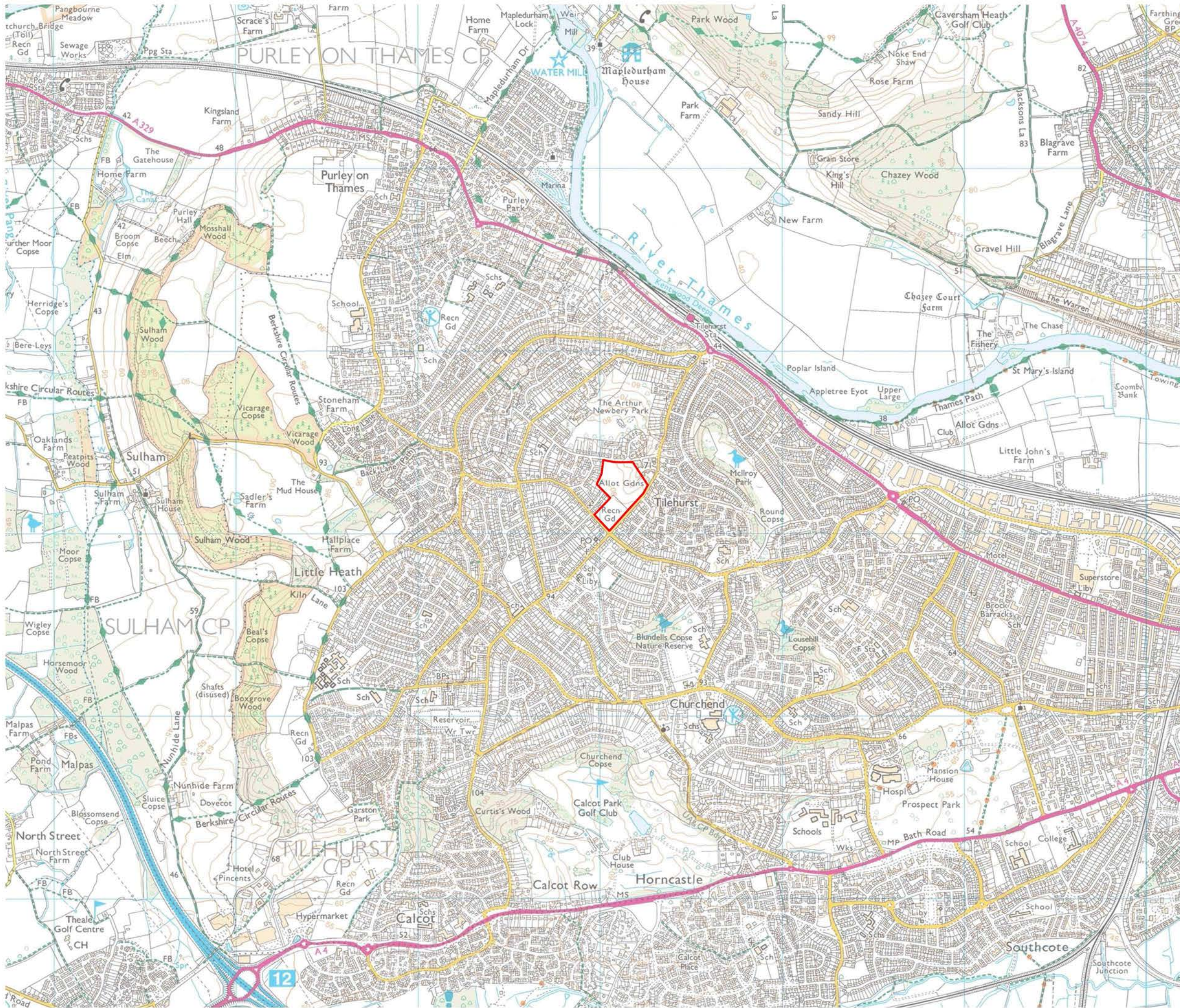
formal and informal recreation but will also connect to existing green corridors providing connectivity between habitats. Where appropriate, SUDS features can contribute to the local GI.

- **Residential Amenity** – Proposals should be aware of neighbouring residential amenity and ensure that proposed built form is located appropriately so as to avoid issues of overlooking or shading. The retention of the existing boundary landscaping will assist and ensure that existing properties on Kentwood Hill, Armour Hill and Wheeler Court are not compromised by the proposed development.

Conclusions

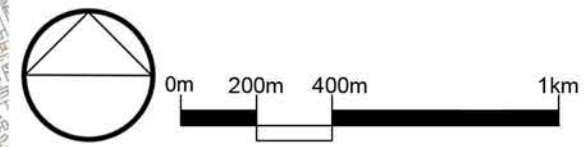
- 3.7. As identified within this appraisal, it is considered that parts of the site would be appropriate for allocation within the Local Plan for residential development from a landscape and visual perspective. The site presents a number of opportunities for development and, subject to a careful, landscape-led approach to the masterplan, it is considered that residential development could be integrated within the site without harm to the Major Landscape Feature Designation, the townscape setting or the receiving visual environment.

ASPECT PLANS



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Key:
 Application Site Boundary

REV	DATE	NOTE	DRAWN	CHK'D
REVISIONS				

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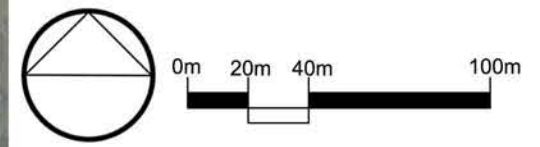
TITLE
 Land at Kentwood Hill, Tilehurst
 Site Location Plan

CLIENT
 Tilehurst Poor's Land Charity

SCALE	DATE	DRAWN	CHK'D
1:20000@A3	MAY 2017	SB	AM
DRAWING NUMBER		REVISION	
6201 / ASP1			



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- Key:
- Application Site Boundary
 - Internal Land Parcels
 - Built Edge

REV	DATE	NOTE	DRAWN	CHK'D
REVISIONS				

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TITLE
 Land at Kentwood Hill, Tilehurst
 Site & Setting Plan

CLIENT
 Tilehurst Poor's Land Charity

SCALE 1:2500@A3	DATE MAY 2017	DRAWN SB	CHK'D AM
DRAWING NUMBER 6201 / ASP2		REVISION	

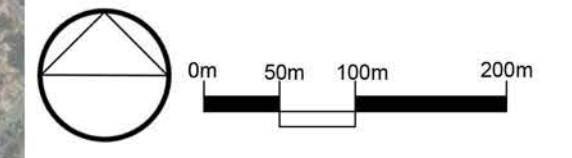
APPENDIX 1

PHOTOGRAPHIC RECORD



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- Key:
- Application Site Boundary
 - Viewpoint Location

REV	DATE	NOTE	DRAWN	CHK'D
REVISIONS				

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TITLE
 Land at Kentwood Hill, Tilehurst
 Viewpoint Location Plan

CLIENT
 Tilehurst Poor's Land Charity

SCALE 1:5000@A3	DATE MAY 2017	DRAWN SB	CHK'D AM
DRAWING NUMBER 6201 / VLP		REVISION	



Recreation ground beyond existing boundary vegetation

Mature vegetation characterises the south eastern boundary

Viewpoint 1

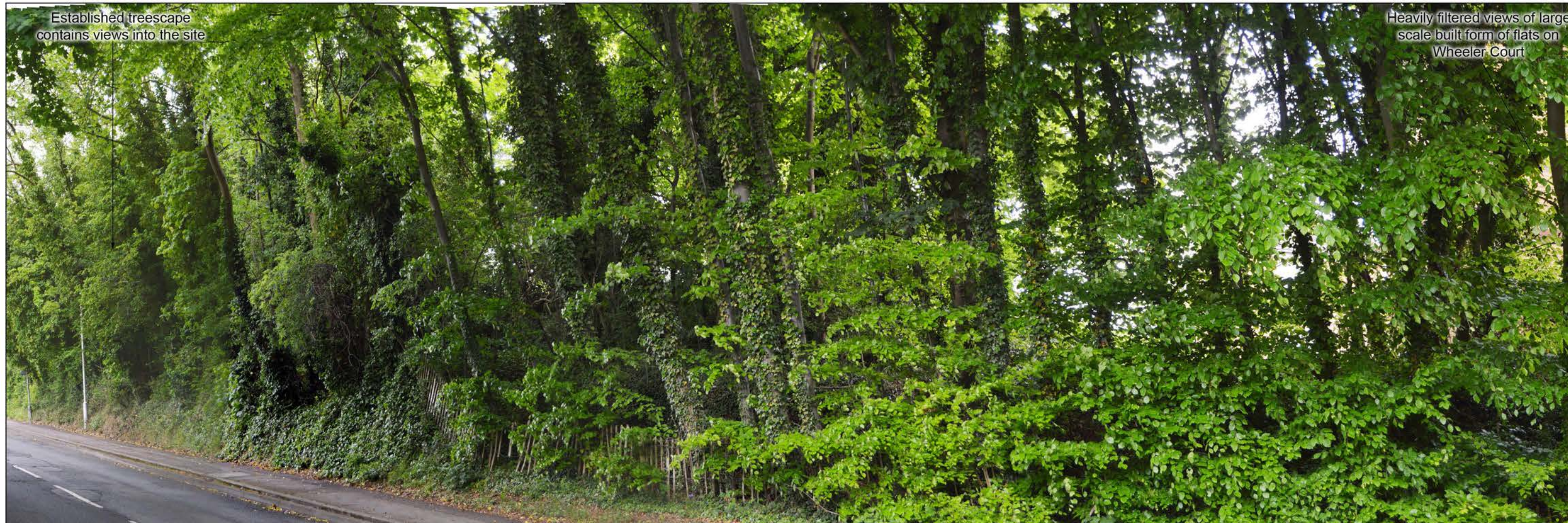


Residential development characterises the streetscene

Kentwood Hill

Mature treescape on south eastern boundary contains views of the builders yard

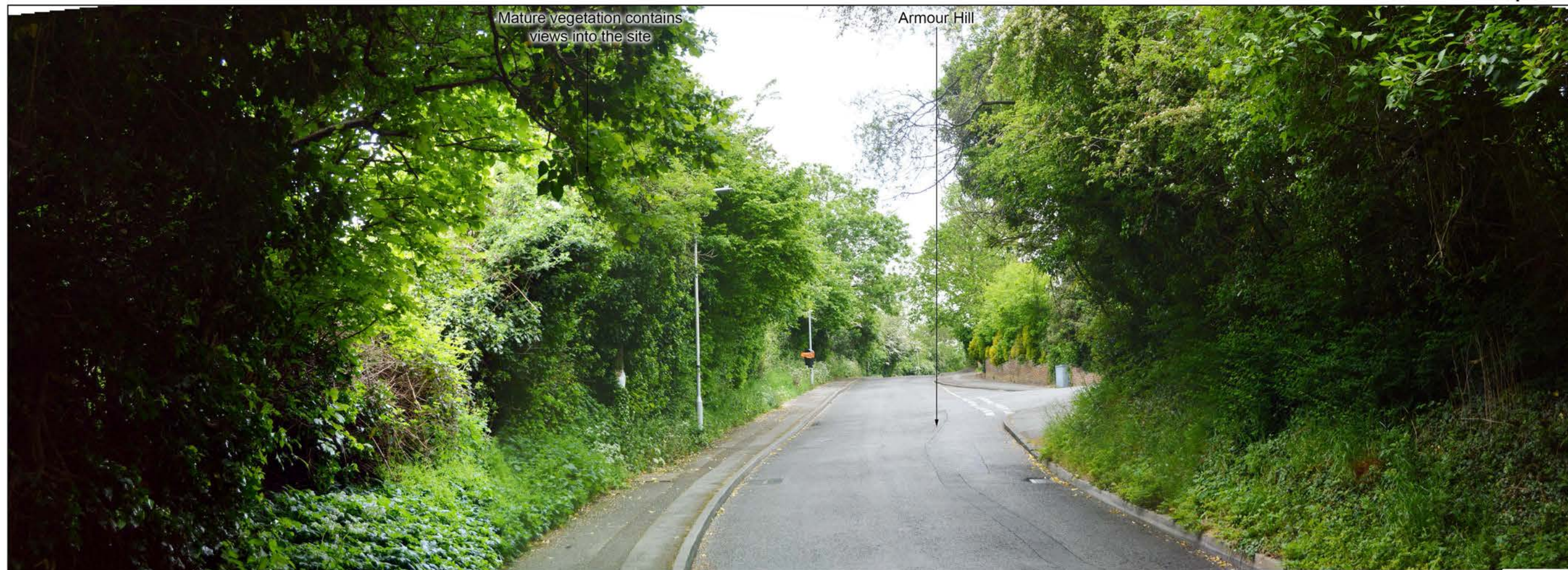
Viewpoint 2



Established treescape contains views into the site

Heavily filtered views of large scale built form of flats on Wheeler Court

Viewpoint 3



Mature vegetation contains views into the site

Armour Hill

Viewpoint 4



Mature vegetation contains views of the allotments and the wider site

Viewpoint 5



Recreation ground beyond built form

Armour Road

Viewpoint 6



Viewpoint A



Viewpoint B

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Kentwood Hill, Tilehurst

Reference number 106303



SITE ACCESS APPRAISAL



SYSTRA

KENTWOOD HILL, TILEHURST

SITE ACCESS APPRAISAL

IDENTIFICATION TABLE

Client/Project owner	Tilehurst Poor's Lands Charity
Project	Kentwood Hill, Tilehurst
Study	Site Access Appraisal
Type of document	Report
Date	12/06/2017
Reference number	106303

APPROVAL

Version	Name	Position	Date	Modifications
1	Author	Lewis Thomas	Consultant	18/05/2017
	Checked by	Richard Stacey	Director	18/05/2017
	Approved by	Richard Stacey	Director	12/06/2017

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APPENDICES

Appendix A – Site Location Plan
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Appendix C – Swept Path Analysis
Appendix D – Highway Boundary

1. INTRODUCTION

1.1 Context

- 1.1.1 This Site Access Appraisal (SAA) has been prepared by SYSTRA to provide technical transport and highways evidence base support for the promotion of the site through the Local Plan (LP) process, to allow the provision of residential development.
- 1.1.2 The proposed development site allocation is located at Kentwood Hill / Armour Hill, Tilehurst, Reading. The site is bordered by residential dwellings and Armour Hill to the north, to the east by residential flats, south by Kentwood Hill Road and residential dwellings, and to the west by Armour Road and residential dwellings. The site area proposed for development currently includes a builders yard and unused scrubland. Within the full site boundary, allotment gardens and recreation grounds (identified as proposed Local Green Space (EN7Wu) within the emerging LP) are also present.
- 1.1.3 The exact design and composition of the proposed development has yet to be confirmed and will be the subject of any forthcoming planning application. The opportunity for residential use has been identified in both the Issues and Options LP consultations and Regulation 18 stage of the emerging LP.
- 1.1.4 The proposed allocation for development of the site seeks to demolish and remove the existing builders yard and scrubland associated with the proposed development area, and identified the potential to construct a new residential development (allocations WR3s and WR3t).
- 1.1.5 A site location plan is reproduced in **Appendix A**. It is understood that the recreation ground, allotments and unused scrubland with trees & brook, although forming part of the allocation site, will not be developed on for residential use and are instead identified as Local Green Space.
- 1.1.6 The local highway authority (LHA) is Reading Borough Council (RBC).

1.2 Report Structure and Policy Considerations

- 1.2.1 This Site Access Appraisal considers the highway and transport matters associated with the proposed allocation of the site for development. It has been produced with consideration of key policy at a National, Regional and Local level. The key transport policy considered are outlined below:

- National Planning Policy Framework (First Published March 2012);
- RBC Draft Local Plan (2017);
- RBC Core Strategy (2008, altered 2015);
- RBC Local Development Framework – Revised Parking Standards and Design (2011); and
- RBC Local Transport plan 3: Strategy 2011-2026;

For completeness, we note that part of the site is also identified as an Area of Identified Biodiversity Interest (Policy EN7) and a Major Landscape Feature (Policy EN13).

1.2.2 The content of this Site Access Appraisal is as follows:

- **Section 2 Existing Situation** – Provides an overview of the site’s existing use and the current transport conditions prevailing at the site and in the immediate surrounding area;
- **Section 3 Development Proposals** - Presents an overview of the proposed site allocation and development options in respect of trip generation, access and vehicle and cycle parking arrangements.
- **Section 5 Summary and Conclusion** – Summarises the main points made in the SAA and forms conclusions based on the main highway and transport matters associated with the proposed site allocation for development.

1.3 Key Policy Objectives

National Planning Policy Framework (NPPF, 2012)

1.3.1 The NPPF was first published on 27 March 2012. It came into effect immediately, superseding all other national planning policy (except on waste).

1.3.2 The document sets out the Government’s economic, environmental and social planning policies for England and it’s expectation for their application. It is meant as high level guidance for local councils to use when defining their local and neighbourhood plans. This approach allows the planning system to be tailored to reflect the needs and priorities of individual communities.

1.3.3 The essence of the document is to support sustainable development, defined as ‘meeting the needs of the present without compromising the ability of future generations to meet their own needs’ (p.2).

1.3.4 The NPPF defines the delivery of sustainable development through three roles:

- Planning for prosperity (an economic role);
- Planning for people (a social role); and
- Planning for places (an environmental role).

1.3.5 It notes that to achieve sustainable development, these roles should be sought jointly and simultaneously through the planning system;

“At the heart of the NPPF is a presumption in favour of sustainable development which ‘should be seen as a golden thread running through both plan making and decision taking” (Paragraph 14);

“Policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay” (Paragraph 15).

1.3.6 A sustainable transport mode is described as ‘any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, low and ultra-low emission vehicles, car sharing and public transport’ (Annex 2, p.57).

1.3.7 Paragraph 34 seeks to ensure that ‘developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised’.

Reading Borough Council – Draft Local Plan (2017)

- 1.3.8 RBC’s Draft Local Plan (DLP) sets out the policies for how Reading will develop up to 2036. It identifies the amount of development that will take place, the areas and sites where development is expected to be accommodated, and where it will be restricted, and sets out policies for how planning applications will be decided. Once adopted, the Local Plan will replace RBC’s current development plans, including the Core Strategy.
- 1.3.9 Policy TR1 of the DLP states that proposed development should contribute appropriately to meeting the objectives of the most up-to-date Local Transport Plan or any successor document, including sub-strategies, specific projects identified and the local action plans. Planning permission will not be granted for major development proposals unless there is a commitment to implement measures to promote and improve sustainable transport facilities, such as through provision to encourage walking, cycling and the use of public transport; and through agreed travel plans, safe routes to local facilities and services, including schools and parks, and similar measures. All development proposals should make appropriate provision for works and contributions to ensure an adequate level of accessibility and safety by all modes of transport from all parts of a development, particularly by public transport, walking and cycling, in accordance with any agreed transport assessment submitted as part of the application.
- 1.3.10 With regard to Access, traffic and Highways, policy TR3 of the DLP states that In determining proposals involving a new or altered access onto the transport network, improvement works to the transport network, the creation of new transport infrastructure or the generation of additional trips on the transport network, consideration will be given to the effect on safety, congestion and the environment. Development will only be permitted where:
- Accesses and works to the highway comply with the adopted standards of the Transport Authority;
 - The development would not have a material detrimental impact on the functioning of the transport network;
 - The proposals would not be detrimental to the safety of users of the transport network, including pedestrians and cyclists;
 - The proposal would not generate regular movement of heavy goods vehicles (HGVs) on unsuitable roads, or on roads without easy access to the Classified Highway Network; and
 - For non-residential uses, or new dwellings on classified roads, off-street servicing would be provided.
- 1.3.11 TR3 of the DLP goes on to state that proposals involving either the construction of a new site access, or a material increase in the use of an existing site access, directly onto the Classified Highway Network will not be acceptable if they would be likely to result in the encouragement of the use of the network for short local trips or compromise the safe movement and free flow of traffic on the network or the safe use of the road.
- 1.3.12 The DLP in policy TR4 references cycle routes and facilities suggesting that developments will be expected to make full use of opportunities to improve access for cyclists to, from and within the development and to integrate cycling through the provision of new facilities. Development of new facilities for cycling, such as cycle hire points and cycle parking, will be acceptable.
- 1.3.13 The cycle routes identified in the most up-to-date Cycling Strategy will be maintained, enhanced and added to or extended. Development will not detrimentally affect an

identified cycle route. Where opportunities exist, improvements to that route, including the provision of connecting routes, and/or cycling facilities will be sought within developments or through planning contributions.

1.3.14 Regarding car and cycle parking, policy TR5 states that Development should provide car parking and cycle parking that is appropriate to the accessibility of locations within the Borough to sustainable transport facilities, particularly public transport.

1.3.15 With regard to the parcel of land at Kentwood Hill (site WR3s), the DLP suggests that development could support 41-62 dwellings and it should:

- Be supported by information showing how development fits within a comprehensive approach to the whole area (including WR3t and the protection of the neighbouring allotments and recreation ground);
- Assess and mitigate any impacts on the Kentwood Hill/Norcot Road/School Road junction;
- Provide adequate footway/cycleway provision to link into existing routes;
- Include a landscaped border to Kentwood Hill;
- Provide for green links between the copse and the Victoria Recreation Ground, and between the copse and Kentwood Hill;
- Avoid adverse effects on important trees including those protected by TPO;
- Avoid any detrimental impacts upon biodiversity, and provide for biodiversity net gain wherever possible;
- Avoid adverse visual impacts on the West Reading Wooded Ridgeline major landscape feature;
- Take account of potential archaeological significance; and
- Take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water, and make provision for upgrades where required.

1.3.16 Regarding the parcel of land Armour Hill (site WR3t), the DLP suggests that the development could support 12-18 dwellings and should:

- Be supported by information showing how development fits within a comprehensive approach to the whole area (including WR3s and the protection of the neighbouring allotments and recreation ground);
- Ensure vehicle access to, parking for and security of the allotments;
- Assess and mitigate any impacts on the Armour Hill/Kentwood Hill junction;
- Include a landscaped border to Armour Hill;
- Avoid adverse effects on important trees including those protected by TPO;
- Avoid any detrimental impacts upon biodiversity, and provide for biodiversity net gain wherever possible;
- Avoid adverse visual impacts on the West Reading Wooded Ridgeline major landscape feature;
- Take account of potential archaeological significance; and
- Take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water, and make provision for upgrades where required.

Reading Borough Council – Core Strategy (2008, altered 2015)

1.3.17 RBC's Core Strategy (CS) was adopted in 2008 with alterations adopted in 2015. The CS is a strategic document which sets out how planning and development will achieve the Reading 2020 Vision for the town. It provides a framework for how Reading can grow in a sustainable way in the future.

1.3.18 The vision of the CS includes that communities will be sustainable and have good access to a range of local facilities, services (including healthcare and education), housing and employment. The quality of the environment will continue to improve, and Reading will become a clean, safe and desirable place in which to live, work, study and visit. Reading will continue to develop as a regional centre serving the wider Thames Valley and provide commensurate opportunities for shopping and entertainment. In the suburbs, appropriate development of housing and services in locations with good links to public transport services will continue. The district and local centres will perform an increasing role of providing services to local populations. Travel from the suburbs to the centre will for many people usually take the form of improved public transport. Green corridors along the Rivers Thames and Kennet will be protected and enhanced as a recreational and ecological resource.

- 1.3.19 In order to achieve the visions, the following objectives are proposed within the CS:
- Strengthen the role of Reading, including the Central Reading Area, as the regional hub for the Thames Valley, providing an accessible focus for the development of employment, housing, services and facilities,
 - Improve the quality of life for those living, working, studying in and visiting the Borough, creating inclusive, sustainable communities with good access to decent and affordable housing, employment, open space and waterspace, transport, education, services and facilities;
 - Ensure new development is accessible and sustainable; and
 - Improve and develop excellent transport systems to improve accessibility within Reading and for the wider area by sustainable modes of transport;

Reading Borough Council – Local Development Framework – Revised Parking and Standards and Design (2011)

1.3.20 RBC’s Local Development Framework sets out its parking standards for Reading. The proposed development is identified as being located within Zone 3 (secondary Core Area) of Reading Borough. Zone 3 includes areas featuring a variety of land uses and densities including local centres for day-to-day needs. A summary of the parking standards for car parking and cycle parking are presented below in **Table 1.1**.

Table 1.1. RBC’s Parking Standards (Zone 3)

USE CLASS	DESCRIPTION	CAR PARKING STANDARDS	CYCLE PARKING STANDARDS (MINIMUM)
C3 Residential	Flats 1-2 beds	1.5	0.5
	Flats 3+ beds	2	1
	Houses 1 bed	1	1
	Houses 2 bed	1.5	2
	Houses 3 bed	2	2
	Houses 4+ bed	2	2
	Visitor Parking	1 space per 4 dwellings (Flats only)	

USE CLASS	DESCRIPTION	CAR PARKING STANDARDS	CYCLE PARKING STANDARDS (MINIMUM)
	Houses in multiple occupation	0.25 per bedroom	

1.3.21 Considerations for cycle parking should be made to ensure it is conveniently located, easy to use, secure and covered. If a secured facility at dwellings for cycle parking is not available (i.e. for flats) then dedicated parking is required (i.e. communal cycle parking).

1.3.22 Disabled spaces should be provided where development is to be a significant size. The suggested levels for developments of up to 200 car parking spaces should be three disabled spaces, or 5% of total capacity (whichever is greater). For developments with over 200 car parking spaces, four disabled spaces plus 4% of total capacity should be provided. Where centrally located flats/apartments do not contain parking for abled bodied residents, disabled spaces must be provided based on the level of units proposed for disabled persons.

1.3.23 Motorcycle and moped parking provision for major developments (of 10 or more units) should be provided based on 2% of the maximum total car parking provision.

1.3.24 Developments larger than 50 units in size (in Zone 3) are expected to provide or support a car club on the site, or demonstrate that the development will have access to and the use of a car club on a nearby site, and provide dedicated car parking spaces on site for the car club.

Local Transport Plan 3

1.3.25 RBC set out a number of broad key transport objectives for the area in their Local Transport Plan 3 (LTP3) 2011-2026. RBC state that their overall vision within LTP3 is that Transport in Reading will better connect people to the places that they want to go: easily, swiftly, safely, sustainably and in comfort. The main themes of this vision being people, place and prosperity.

1.3.26 In line with the overall vision of LTP3, the strategic objectives include:

- To facilitate more physically active travel for journeys in a healthy environment;
- To improve personal safety on the transport network;
- To provide affordable, accessible and inclusive travel options for everyone;
- To ensure that the transport network operates safely and efficiently to meet the needs of all users;
- To align transport and land use planning to enable sustainable travel choices, improve mobility, reduce the need to travel and preserve the natural environment;
- To deliver balanced packages of value for money transport solutions and make best use of existing transport investment;
- To offer sustainable transport choices for the Travel to Work Area and beyond, integrating within and between different types of transport;
- To improve journey times, journey time reliability and the availability of information; and
- To reduce carbon emissions from transport, improve air quality and create a transport network which supports a mobile, affordable low-carbon future.

1.4 Transport Improvements

1.4.1 The RBC LTP3 strategy document outlines the various transport improvements that are currently being implemented or are proposed for the West Reading area (including Tilehurst). These improvements include:

- To review and develop further a sustainable distribution strategy for the area ensuring the use of appropriate routes and effective deliveries to local centres;
- To develop a bus based priority network for the western area, linking to key destinations including a possible park and ride facility in the south western area and considering any additional benefits of the new rail over bridges to be built at Cow Lane;
- To undertake a phased process of neighbourhood or corridor enhancement studies and schemes to deliver multi-targeted benefits including improved safety, local connectivity, public realm, and integrated transport. Relevant local centres include:
 - Tilehurst Triangle;
 - Dee Park;
 - Oxford Road (west); and
 - The Meadway;
- To progress the Oxford Road Area Study, addressing safety and pedestrian issues, providing continuity of cycle links, addressing accessibility issues at Tilehurst station and ensuring an effective traffic management strategy is in place for the completion of the new rail over bridges at Cow Lane; and
- To work with the private sector to innovate and secure delivery of smarter and sustainable transport choices associated with new developments at the former Battle Hospital site and Dee Park.

1.4.2 The above local improvements, with particular focus on improvements at Tilehurst Station and Tilehurst Local Centre, will further encourage existing and future residents to travel by sustainable modes of travel in the area.

2. EXISTING SITUATION

2.1 Introduction

2.1.1 This section of the SAA describes the baseline transport conditions of the existing site and the surrounding area, with a focus on local transport infrastructure and services. The baseline conditions need to be established to fully understand the context of the proposed allocation of the site for development and the associated traffic and transport impacts.

2.2 Site Location

2.2.1 The proposed development site is located off both Kentwood Hill and Armour Hill in Tilehurst and currently accommodates a builders yard and unused scrubland.

2.2.2 The site is bordered by residential dwellings and Armour Hill to the north, to the east by residential flats, south by Kentwood Hill Road and residential dwellings, and to the west by Armour Road and residential dwellings. The site area proposed for development currently includes a builders yard and unused scrubland. Within the full site boundary, allotment gardens and recreation grounds are present.

2.2.3 Access to the existing builders yard is taken from Kentwood Hill approximately 20m south of the Kentwood Hill / Kentwood Close junction in the form of a priority junction with a vehicle crossover. This access is approximately 6m wide. Directly adjacent to the northern edge of this access a telephone pole is present. To the south, a lamppost and bus stop with bus cage and flag pole are present.

2.2.4 A visibility splay of 2.4x43m can be obtained at the existing access for the builders yard, in line with MfS stopping sight distance for 30mph speeds.

2.2.5 Approximately 30m to the south of the existing access to the builders yard, a second vehicle crossover is present, approximately 4.4m in width. This access is now sealed with a fence to prevent access to the site from this location, although it has been operational in the past. Approximately 20m to the south of this access, a gated access set back approximately 4-5m from the kerb edge, approximately 1.5-2m in width, provides access to unused scrubland on site.

2.2.6 Bus stops are located directly adjacent to the site on Kentwood Hill which provide services to Kentwood and occasional services to Purley on Thames, Theale, Little Heath and Pangbourne. Within an acceptable walking distance of approximately 330m, (south of the proposed development), the Victoria bus stops provide regular services to West Reading, Central Reading, New Town and the University of Reading.

2.3 Walking and Cycling

2.3.1 To enable an assessment of the viability of walking between the site and key destinations in the local area, it is appropriate to establish the maximum distance that people are generally prepared to walk and the residential areas and destinations that exist within these distances.

2.3.2 The IHT's guidance, Guidelines for Providing for Journeys on Foot (2000) states in paragraph 3.32 and Table 3.2 that the preferred maximum walking distance to facilities and local services is circa two kilometres. The distances for various land uses are summarised in **Table 2.1** below.

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Table 2.1. Acceptable Walking Distances (metres).

DEFINITION	COMMUTING	ELSEWHERE
Desirable	500m	400m
Acceptable	1,000m	800m
Preferred Maximum	2,000m	1,200

2.3.3 Cycling is considered an important mode of sustainable travel and is generally considered suitable for distances of up to 3 miles (4.8km) for regular journeys in urban areas, and 5 miles (8km) for commuting journeys (source: LTN 2/08, Cycle Infrastructure Design).

Armour Hill

2.3.4 Armour Hill is restricted to 30mph and is approximately 4.4m wide adjacent to the site boundary. Armour Hill routes between Kentwood Hill to the east and Westwood Road to the west. 1.8-2m wide footways are present on both sides of the road in the vicinity of the proposed development. On street parking (undesigned) is present to the west of the proposed development. Armour Hill is street lit with varying levels of adjacent vegetation and tree cover.

Kentwood Hill - (DLP Classified Highway)

2.3.5 In the vicinity of the proposed development, Kentwood Hill restricted to 30mph, is street lit and approximately 7.3m wide with 2m wide footways on both sides of the road. Approximately 80m south of the site, a speed enforcement camera is present monitoring northbound vehicle speeds.

2.3.6 To the north, Kentwood Hill provides access to Overdown Road and Oxord Road (via a designated cycle route in the DLP routing from Gipsy Lane north on Kentwood Hill) where Tilehurst Railway Station is located. An approximate 12% gradient is also present, steepest between the Kentwood Close junction, down to the Armour Hill junction to the north.

2.3.7 To the south, Kentwood Hill provides access to the Local Centre on School Road approximately a 260m walk south of the proposed development, Calcot and the M4 Motorway (Junction 12). The Kentwood Hill/School Road/Norcot Road/Armour Road junction at the southern extent of Kentwood Hill, is a signalised junction with pedestrian crossing facilities.

Armour Road

2.3.8 Armour Road is restricted to 30mph and is street lit with a width of approximately 7m. A designated (parallel) parking area (8am-6.30pm) is present on the northern side of the road. Footways vary between approximately 1.2m (northern side) to 2m (southern side) in width. Speed cushions are also present at varying separations for the full span of Armour Road. Armour Road routes between Norcot Road to the east and Westwood Road to the west.

Norcot Road - (DLP Classified Highway)

In the vicinity of The Victoria bus stop, Norcot Road is approximately 10m wide with parking bays (parallel) present on the southern side of the road. To the east, Norcot Road

provides access to west and central Reading via Oxford Road. Footways are present on both sides of the road and vary in width between approximately 3m (northern side) and 1.8m (southern side). Norcot Road is street lit with a 30mph speed restriction.

School Road - (DLP Classified Highway)

School Road is street lit and approximately 7.8m wide with 2.4m wide footways either side of the road. School Road is restricted to 30mph and provides access to Calcot and the M4 Motorway (junction 12) to the south of the proposed development. A Local Centre is present at the northern extent of School Road by the Kentwood Hill signalised junction. Tilehurst Village Centre is also present approximately a 630 metre walk from the proposed development, which falls within acceptable distances specified within guidance.

2.4 Public Transport

Bus

- 2.4.1 The development site lies within close proximity to the Kentwood Close (150m) and an acceptable walking distance of The Victoria (330m) bus stops.
- 2.4.2 The proposed development is located within Zone 3 (Secondary Core Area) of RBC's Local Development Framework. This classifies Zone 3 as typically within 400m of a Reading Buses high frequency 'Premier Route' (such as bus service route 17) which provides high quality bus routes.
- 2.4.3 The Kentwood Close bus stops provide a bus cage and bus flags with timetable information on both sides of the road.
- 2.4.4 The Victoria bus stops both provide a bus flag with live timetable information, a refuse bin, a bus cage and raised kerbing for step free access. The Victoria bus stop on Norcot Road additionally provides a bus shelter with seating and timetable information.
- 2.4.5 IHT's Guidelines for Planning and Public Transport in Development (1999) states that new developments should be located 400m from the nearest bus stop. The site is within 50 metres of bus stops on either side of the carriageway on Kentwood Hill, and 300m of bus stops at The Victoria on Norcot Road and School Road.
- 2.4.6 A summary of frequent local bus services can be found in **Table 2.2**.

Table 2.2. Local Bus Services

NO.	ROUTE	WEEKDAY		WEEKEND	
		Approx. Frequency	Service Times	Approx. Frequency	
				Sat	Sun
17 (The Victoria bus stops)	Wokingham Road – Central Reading - Tilehurst	7 Mins	24/7	7 Mins	10 Mins
	Tilehurst – Central Reading – Wokingham Road	7 Mins	24/7	7 Mins	10 Mins
28 (Kentwood Hill bus stops)	Caversham – Tilehurst	6 Services	10:25 – 18:57	-	-
	Tilehurst - Caversham	6 Services	08:23 – 6.58	-	-

2.4.7 Other less frequent services (1-2 buses per day) to Purley on Thames, Theale, Little Heath and Pangbourne are also available from the Kentwood Close bus stops adjacent to the proposed development.

2.4.8 The site’s close proximity to a frequent strategic (premier Route) bus service such as Service 17, which provide routes to Reading Station and key employment, retail, and leisure areas in central Reading, ensures that travel to and from the site by bus is a viable mode for residents of the proposed development.

Rail

2.4.9 Tilehurst Railway Station is located adjacent to Oxford Road , approximately 1.2km from the proposed development, which equates to approximately a 14-15 minute walk or three-four minute cycle ride.

2.4.10 Tilehurst Railway Station had some 0.5 million passengers in 2015/2016. The Station is served by local services operated by First great Western and provides regular services between Oxford (approximate journey time: 40mins) and London Paddington (approximate journey time – 50mins). A summary of key services from Tilehurst Railway Station is provided in **Table 2.3**.

Table 2.3. Key Rail Services – Tilehurst Station

DESTINATION	SERVICE FREQUENCIES				
	MONDAY TO FRIDAY			SATURDAY	SUNDAY
	DAYTIME FREQUENCY	FIRST SERVICE	LAST SERVICE		
London Paddington (via Reading)	2 per hour	05:35	00:35	2 per hour	1 per hour
Oxford	2 per hour	06:01	01:06	2 per hour	1 per hour

Note: First / last service from Tilehurst Railway Station.

2.4.11 Reading Station can also be accessed by bus service 17 which frequently routes into central Reading. Additional rail services are available from Reading Station including services to Gatwick Airport, London Waterloo, Cheltenham, Birmingham, Manchester, Edinburgh, Leeds and Southampton, as well as express services to London Paddington. Further, frequent Rail Air bus services are also available to Heathrow from Reading Station.

Local Amenities

2.4.12 In transport planning terms, the most sustainable sites are those generating the lowest number of private vehicle trips, which would be achieved by enabling a greater proportion of walking, cycling and public transport journeys. This can be considered in terms of the distance of a site from local services and resident catchment.

2.4.13 As aforementioned, the IHT’s ‘Guidelines for Providing Journeys on Foot’ (2000) provides guidance when considering accessibility of specific locations by foot. The IHT suggest an average walking speed of 4.8km/h, or 5 minutes for every 400m. The ‘maximum’ distances represent a walk of 10 minutes (town centres), 25 minutes (work/education/leisure) and 15 minutes (elsewhere).

2.4.14 Zone 3 in RBC’s Local Development Framework, where the proposed development is sited, suggests that walking and cycling can play an important role in these areas.

The development site is well served by a range of education, retail, employment and leisure facilities, many of which are within the maximum recommended walking and cycling distances. Details in respect to the accessibility of the neighbouring land uses and facilities are set out in **Table 2.4**. The table summarises these local facilities and land uses while also identifying the approximate distances and corresponding typical journey times measured from the site.

2.4.15 It should be noted that examples of key services are provided for typical residents use, and the below table is not an exhaustive list of all services in the area.

Table 2.4. Local facilities.

FACILITY	DISTANCE FROM SITE (METRES)	WALKING TIME (1.4 M/S)	CYCLING TIME (5.5M/S)
School Road Local Centre	210	6-7 mins	1-2 mins

FACILITY	DISTANCE FROM SITE (METRES)	WALKING TIME (1.4 M/S)	CYCLING TIME (5.5M/S)
School Road Employment (to rear)	300	3-4 mins	1 min
Armour Hill Allotments	210	6-7 mins	1-2 mins
School Road Local Centre	300	3-4 mins	1 min
School Road Employment (to rear)	420	5 mins	1-2 min
Arthur Newbery Park	400	5 mins	1 min
Norcot Road Employment (BT)	450	5-6 mins	1-2 min
Park Lane Primary School	580	7 mins	2 mins
Triangle Dental Practice	650	7-8 mins	2 mins
Tilehurst Village Centre	660	8 mins	2 mins
Tilehurst Clinic	660	8 mins	2 mins
Westwood Road Health Centre	800	9-10 mins	2-3 mins
Tilehurst Surgery	1,200	14-15 mins	3-4 mins
Waitrose	1,600	19 mins	5 mins
Reading Retail Park	1,600	19 mins	5 mins

2.4.16 The majority of the services and local amenities outlined above are accessible directly either by a short walk or a cycle ride away. There are also a range of sustainable transport choices available to the site.

2.5 Census 2011 Modal Split

2.5.1 The site is located within Reading 005 Mid-level Super Output Area (MSOA).

2.5.2 **Table 2.5** shows how people within this MSA currently (2011) travel to work, as obtained from 2011 Census Journey to Work Data. This provides an indication of overall travel patterns in the area, with travel to work being a main reason to travel during the peak hours. Other trip purposes will have different mode split levels

Table 2.5. Method of travel to Work (Reading 005)

MODE	COUNT	MODE SHARE
Car Driver	2,705	67%
Car Passenger	231	6%
Taxi	9	0%

MODE	COUNT	MODE SHARE
Bus	397	10%
Rail	279	7%
Motorcycle	33	1%
Bicycle	122	3%
Walking	247	6%
Total	4,023	100%

2.5.3 The data shows that 17% of journeys to work in the MSOA utilise public transport (10% via buses and 7% utilising the railway). Other sustainable modes such as cycling (3%) and walking (6%), make up 9% of all trips. In total 67% of people travel to work by driving a private car, with an additional 6% car sharing. The remainder of people travelled by other modes, such as by motorcycle.

2.6 Road Safety

2.6.1 A review of the most recent five years of injury data on the www.crashmap.co.uk website demonstrates that there have been no injury collisions in the immediate vicinity of the Existing Builders Yard access. **Figure 2.1** displays an extract of the injury collisions from Crashmap.

Figure 2.1. Extract of collisions from Crashmap



2.6.2 In the immediate vicinity of the site, three 'slight' injury collisions and one 'serious' injury collision have been identified.

2.6.3 The 'serious' injury collision occurred on Kentwood Hill between the Gipsy Lane and Armour Hill junctions and involved one vehicle and one casualty. One 'slight' injury collision occurred on Kentwood Hill adjacent to the north eastern edge of the Victoria

Recreation Ground, and involved two vehicles and one casualty. A further 'slight' injury collision occurred on Kentwood Hill at The Victoria signalised junction, involving two vehicles and one casualty. The final 'slight' injury collision in the immediate vicinity of the proposed development occurred on Armour Road between the Polsted Road and Lower Armour Road junctions. This collision involved two vehicles and two casualties.

2.6.4 In the wider area, two 'slight' injury collisions have been identified on Norcot Road and five on School Road. One serious injury collision occurred on Norcot Road between The Victoria signalised junction and Blundells Road junction. This collision involved two vehicles and one casualty. The second collision identified on Norcot Road occurred at the Blundells Road junction and involved two vehicles and one casualty with 'slight' injuries. On School Road, four 'slight' and one 'serious' injury collision have been identified in the vicinity of Recreation Road junction. The 'serious' injury collision involved one vehicle and one casualty. The remaining four 'slight' injury collisions represented five separate vehicles resulting in four injuries.

2.6.5 Injury collisions will be subject to further investigation to establish cause as part of any planning application submission, to establish whether any of these injury collisions represent an existing safety issue which may be exacerbated as a result of the proposed development. Mitigation / safety improvements will be proposed if necessary with any future planning application.

2.7 Summary

2.7.1 This section has demonstrated that the proposed site allocation for development is located in a highly accessible location for a various range of modes of transport with good pedestrian and cycle links in the local area and with regular, high frequency bus and rail services to the Town Centre, Reading Railway Station and to wider urban areas.

2.7.2 Existing access to the Builders Yard is taken from a gated private access off of Kentwood Hill through a priority junction at a vehicle crossover. Sufficient visibility (43m) in line with MfS stopping sight distances for 30mph speeds is available from the existing access. Collision data will be subject to further investigation to establish cause, and any mitigation necessary will be proposed as part of any future planning application.

2.7.3 The potential site allocation for development therefore provides access to a number of modes of travel and will encourage sustainable travel in compliance with national, regional and local policy objectives.

3. SITE ALLOCATION DEVELOPMENT PROPOSAL

3.1 Proposal

3.1.1 The exact design and composition of the proposed development, should it be allocated, has yet to be confirmed, but it is understood that the opportunity for residential use has been identified within the emerging LP. The proposed site plan can be found in **Appendix A**. The recreation ground, allotments and unused scrubland with trees & brook, although forming part of the allocation site, will not be developed on for residential use.

3.2 Trip Generation

3.2.1 Provisional trip rates have been obtained from an interrogation of the TRICS database version 7.4.1 to determine the likely trip rates for a proposed residential development. The development schedule is estimated for the purposes of this report and providing a guide to trip rates only and it does not constitute the development scheme which will be the subject of any future planning application.

3.2.2 For the purposes of calculating provisional peak period trip rates, an approximate development quantum of up to 80 dwellings has been assumed, this is based on the maximum estimation of dwellings for sites WR3s and WR3t in the DLP.

3.2.3 The following primary parameters were selected within the TRICS database to calculate the trip rates for the proposed residential and employment elements of the scheme:

- 03 Residential – Houses Privately Owned;
- Located in all regions excluding Scotland, Wales and Northern Ireland;
- Located in a Edge of Town Centre or Suburban Area;
- Survey date of 2009 onwards;
- Any weekday; and
- Developments of up to 250 dwellings.

3.2.4 **Table 3.1** summarises the proposed provisional person trip rates. The TRICS outputs are available upon request.

Table 3.1. Proposed Provisional Person Trip Rates

	Trip Rates			Trips		
	Arrivals	Departures	Two-way	Arrivals	Departures	Two-way
AM Peak (08:00-09:00)	0.22	0.765	0.985	18	61	79
PM Peak (17:00-18:00)	0.589	0.294	0.883	47	24	71
12 Hour Period (07:00-19:00)	3.766	4.075	4.217	301	326	627

3.2.5 The results show that there would be up to a total of approximately 79 two way person trips in the AM peak (08:00-9:00), 71 two-way trips in the PM peak (17:00-18:00) and 627 two-way trips over a 12 hour day (07:00-19:00).

3.2.6 It should be noted that a number of trips will also be removed when the Builders Yard is demolished. Furthermore, a number of HGV trips associated with the existing builders yard, which are inappropriate considering the nature of the surrounding residential area

and slow turning movements at the access junctions, will also be removed. Therefore, the proposed development represents an overall benefit on the local highway network, with the removal of these HGV trips from the network. Furthermore, the calculated trip generation of the proposed development therefore represent a worst case scenario.

3.2.7 To estimate the multi modal trips generated the Census Journey to Work percentages, outlined in **Table 2.5**, have been applied to the trip generation, outlined in **Table 3.1**. As such, the proposed development multimodal trip generations is outlined below in **Table 3.2**.

Table 3.2. Proposed Multi-Modal Trips

Mode	Mode Share	AM Peak (08:00-09:00)			PM Peak (17:00-18:00)			12 hour (07:00-19:00)		
		In	Out	Tot	In	Out	Tot	In	Out	Tot
Car	67%	12	41	53	31	16	47	202	218	420
Car Passenger	6%	1	4	5	3	1	4	18	20	38
Motorcycle	1%	0	0	0	0	0	0	3	3	6
Bicycle	3%	1	2	3	2	1	3	9	10	19
Walk	6%	1	4	5	3	1	4	18	20	38
Bus	10%	2	6	8	5	3	8	30	32	62
Rail	7%	1	4	5	3	2	5	21	23	44
Total	100%	18	61	79	47	24	71	301	326	627

3.2.8 The assessment shows that the proposed development could generate up to approximately 53 two-way vehicle trips in the AM peak hour, approximately 47 two-way vehicle trips in the PM peak hour and approximately 420 two-way vehicle trips over a 12-hour day. This also does not take account of the reduction in trips as a result of demolishing the existing builders yard would have.

3.2.9 The proposed trips would be capable of being accommodated on the transport network; noting the site is ideally located to maximise trips by sustainable modes.

3.3 Access and Parking

3.3.1 Vehicular access to the proposed development will be taken from Kentwood Hill and Armour Hill. Drawings 106303-D001 and 106303-D003 in **Appendix B**, based on an OS-detailed base and site visit measurements, show the preliminary, indicative site access designs which could be promoted as appropriate for residential use on the site.

3.3.2 Visibility splays of 2.4m x 43m are available at the proposed access points on both Kentwood Hill and Armour Hill. These visibility splays are in line with Manual for Streets (MfS) stopping sight distances for 30mph vehicle speeds.

3.3.3 In the vicinity of the proposed northern access, Armour Hill is approximately 4.4m wide, on a hill and has on street parking. On Kentwood Hill, a speed camera is also present approximately 120m south of the proposed access on Kentwood Hill. Therefore, it is assumed that the vast majority of vehicles at the proposed access points, will not exceed the 30mph speed restriction. Subsequently, a 30mph design speed is considered appropriate for this location at this stage.

- 3.3.4 The residential access roads will be 5.5m in width with an 8m radius and 2m footways on both sides of the road. At this stage, the internal layout of roads and pedestrian/cycle links within the site are not yet known.
- 3.3.5 The indicative access feasibility designs are in accordance with guidance set out in Manual for Streets (MfS) and will be subject to a road safety audit which will be submitted with any planning application.
- 3.3.6 Swept path analysis, attached at **Appendix C**, has been undertaken to show a refuse vehicle entering and exiting the site in forward gear. The internal layout of any potential development will allow these vehicles to safely manoeuvre within the site to turn around and exit the site.
- 3.3.7 Highway boundary information has been obtained from RBC (**Appendix D**), this shows that both accesses can be provided within the client’s land control or within the highway boundary. Third party land is not required and so there are no barriers to the delivery of these access points.
- 3.3.8 The proposed access from Kentwood Hill is effectively replacing the existing access for the Builders yard, which will result in a the removal of HGV’s associated with the existing development. The provision of these new accesses will accommodate an increase in trips associated with the proposed development and provide an overall net benefit to the present situation for the Builders Yard element of the development.
- 3.3.9 Access can also be provided from Armour Hill to the proposed development. However, due to the width of the road here, this northern parcel of land is only suitable for a limited level of development. The main access is formed onto Kentwood Hill, effectively replacing the existing site access as noted above.

Car and Cycle Parking Standards

- 3.3.10 Car and cycle parking of the proposed development will be provided in line with standards set out in RBC’s Development Framework - Revised Parking Standards document, which are summarised in **Table 1.1** for zone 3. The car parking standards, for residential developments, are based on access to alternative modes and other factors such as levels of car ownership.
- 3.3.11 The car parking standards are ‘required standards’ and there is no reason to suggest that the site allocation could not meet with these requirements. Should fewer spaces be required, then there would need to be a demonstration (to the highway authorities satisfaction) that there would be no detriment to highway safety as a result. Under exceptional circumstances the Local Authority will give consideration to a higher level of car parking provision. This requirement would need to be supported by robust evidence.

4. SUMMARY AND CONCLUSION

- 4.1.1 This Site Access Appraisal (SAA) has been prepared to promote a site allocation through the Local Plan process, as a suitable site for the provision of residential development.
- 4.1.2 The proposed development is located at Kentwood Hill and Armour Hill, Tilehurst. The site is bordered by residential dwellings and Armour Hill to the north, to the east by residential flats, south by Kentwood Hill Road and residential dwellings, and to the west by Armour Road and residential dwellings. The site area proposed for development currently includes a builders yard and unused scrubland. Within the full site boundary, allotment gardens and a recreation grounds are also present.
- 4.1.3 The proposed development site is located in a highly accessible location with a range of sustainable modes of transport, such as Premier (bus) Route 17, and comprehensive pedestrian/cycle links in and around Tilehurst and regular bus services to Reading Town Centre and Railway Station. A range of facilities, such as Tilehurst Railway Station, School Road local centre, Deacon Way Trading Estate and Park Lane School, are within an acceptable walking and cycling distance of the proposed development.
- 4.1.4 Regular rail services are also available into central London and Oxford from Tilehurst Railway Station, with additional and express services available from Reading station. The site allocation for potential development, therefore provides access to a number of modes of travel and will encourage sustainable travel in compliance with national, regional and local policy objectives.
- 4.1.5 The potential re-development could result, as a worst case based on estimates made for the purposes of this report, in up to a total of approximately 53 two way vehicle movements in the AM peak (08:00-09:00), 47 two-way vehicle trips in the PM peak (17:00-18:00) and 420 two-way vehicle trips over a 12 hour day (07:00-19:00). This makes no allowance for the removal of existing vehicle movements to and from the site, many of which will be HGV movements. Due to the level of the site’s accessibility by all modes of transport, especially with its close proximity to the Premier (bus) Route 17, there will be the opportunity to encourage a shift away from private car use.
- 4.1.6 Vehicular access to the site allocation for potential development will be taken from Armour Hill and Kentwood Hill through the implementation of simple priority junctions. Drawing 106303-001 and 106303-03, in **Appendix B**, show the indicative, preliminary site access designs. These designs are in accordance with guidance set out in MfS. The access(es) can be delivered on land within the client’s control or land within the highway boundary. Third party land would not be required and there is no barrier to the delivery of the access into the site.
- 4.1.7 Swept path analysis, attached at **Appendix C**, has been undertaken to show a refuse vehicle entering and exiting the site in forward gear. The internal layout of potential development will allow these vehicles to safely manoeuvre within the site to turn around and exit the site.
- 4.1.8 Vehicle and cycle parking provision for any future use of this site can be provided in line with local guidance set out by RBC in their Local Development Framework document.
- 4.1.9 The proposed development currently forms a Builders Yard and unused scrubland. Other land within the site boundary includes Victoria Park, allotment gardens and a brook. Due to the high level of accessibility and sustainability the site benefits from, this makes it an ideal location for a more intensive use (and increase in trip generation), in line with

sustainable development policy objectives set out in the NPPF. An improved access from Kentwood Hill will also bring benefits and provide safe access for an increased level of trips, with an overall net benefit on the existing situation. There are no transport or highway reasons as to why the site should not be brought forward as part of the Local Plan Process.

APPENDIX A – SITE LOCATION PLAN

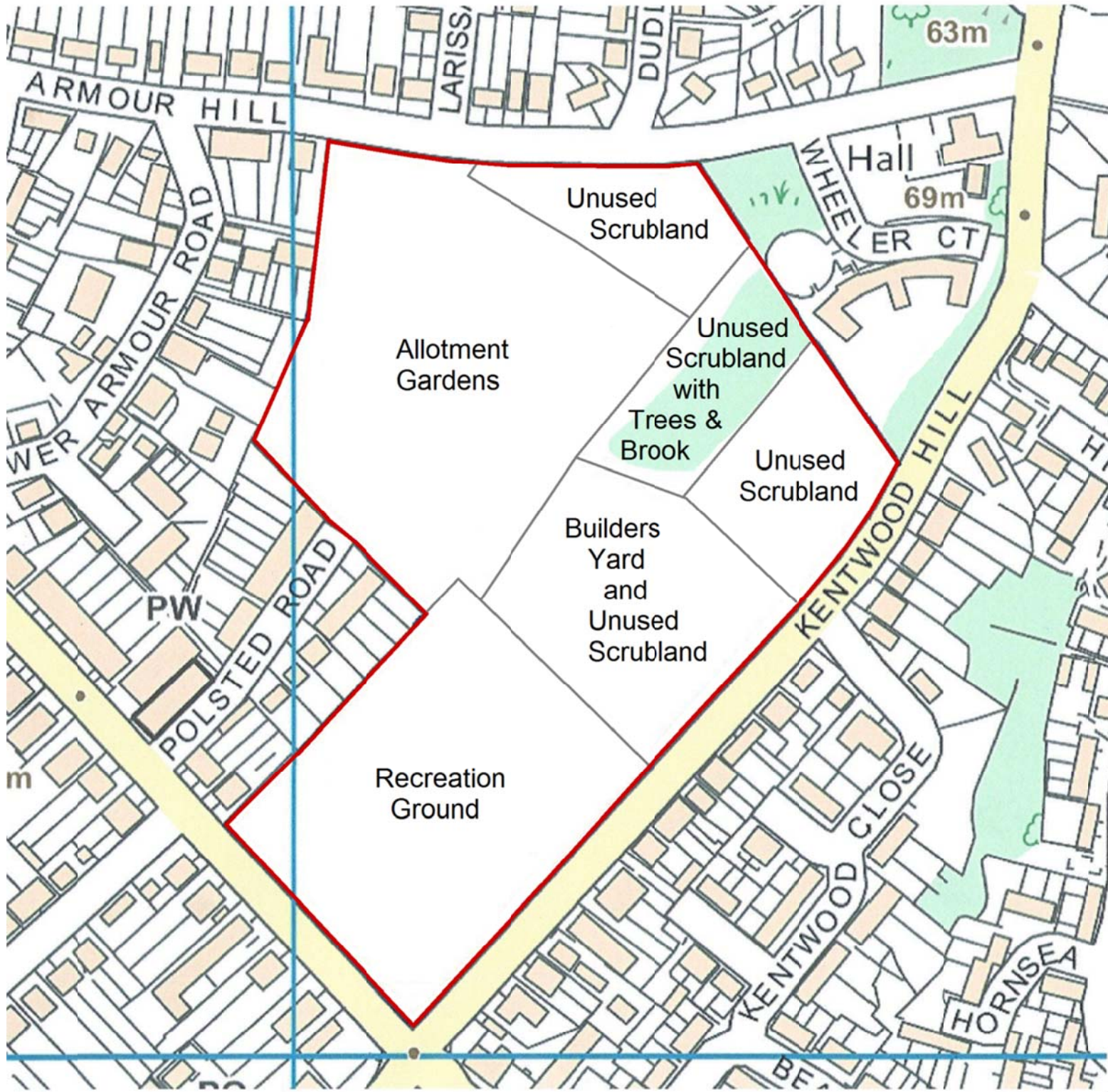
Kentwood Hill, Tilehurst

Site Access Appraisal

106303

Report

12/06/2017



Key:
 — Candidate Site for Housing with some provision for community leisure space

Land at Kentwood Hill, Armour Hill, Polsted Road and Armour Road in Tilehurst, Reading

Landowner:
 Tilehurst Poor's Land Charity (Regd Charity No. 204048)

Drawing:
 Site Location Plan

Scale:
 Approx 1:2000 @ A3

Date:
 October 2015

APPENDIX B – PROPOSED ACCESS

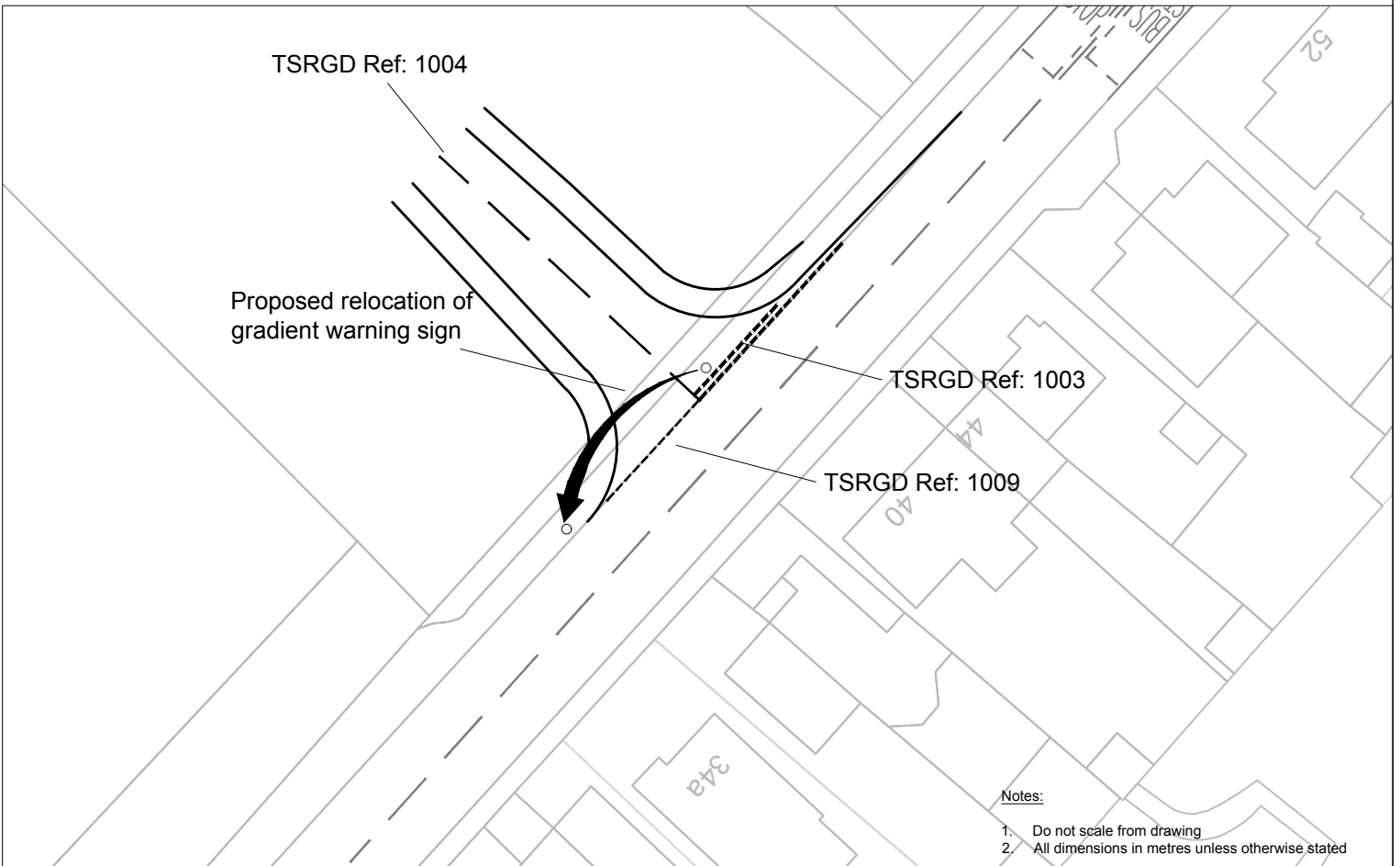
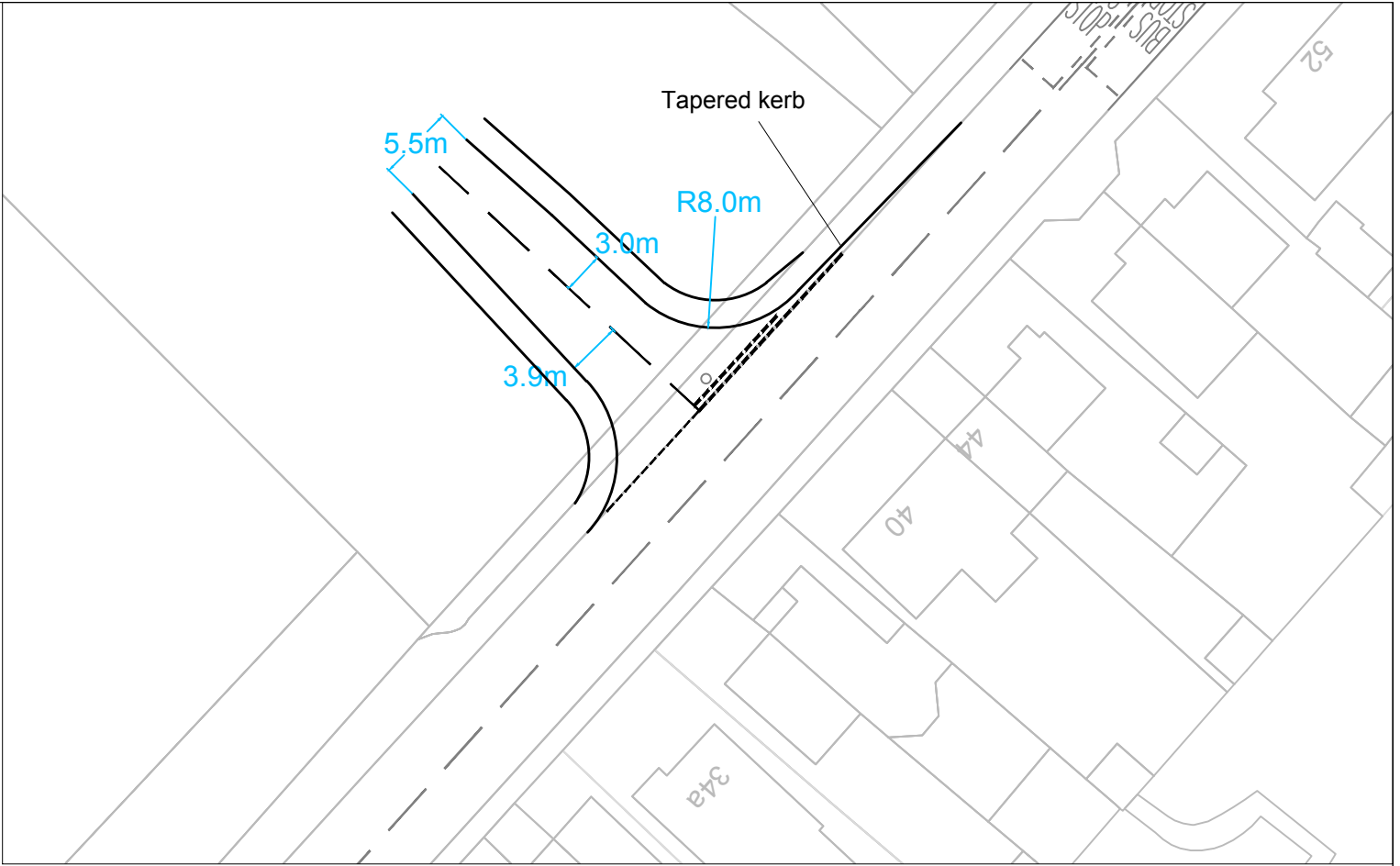
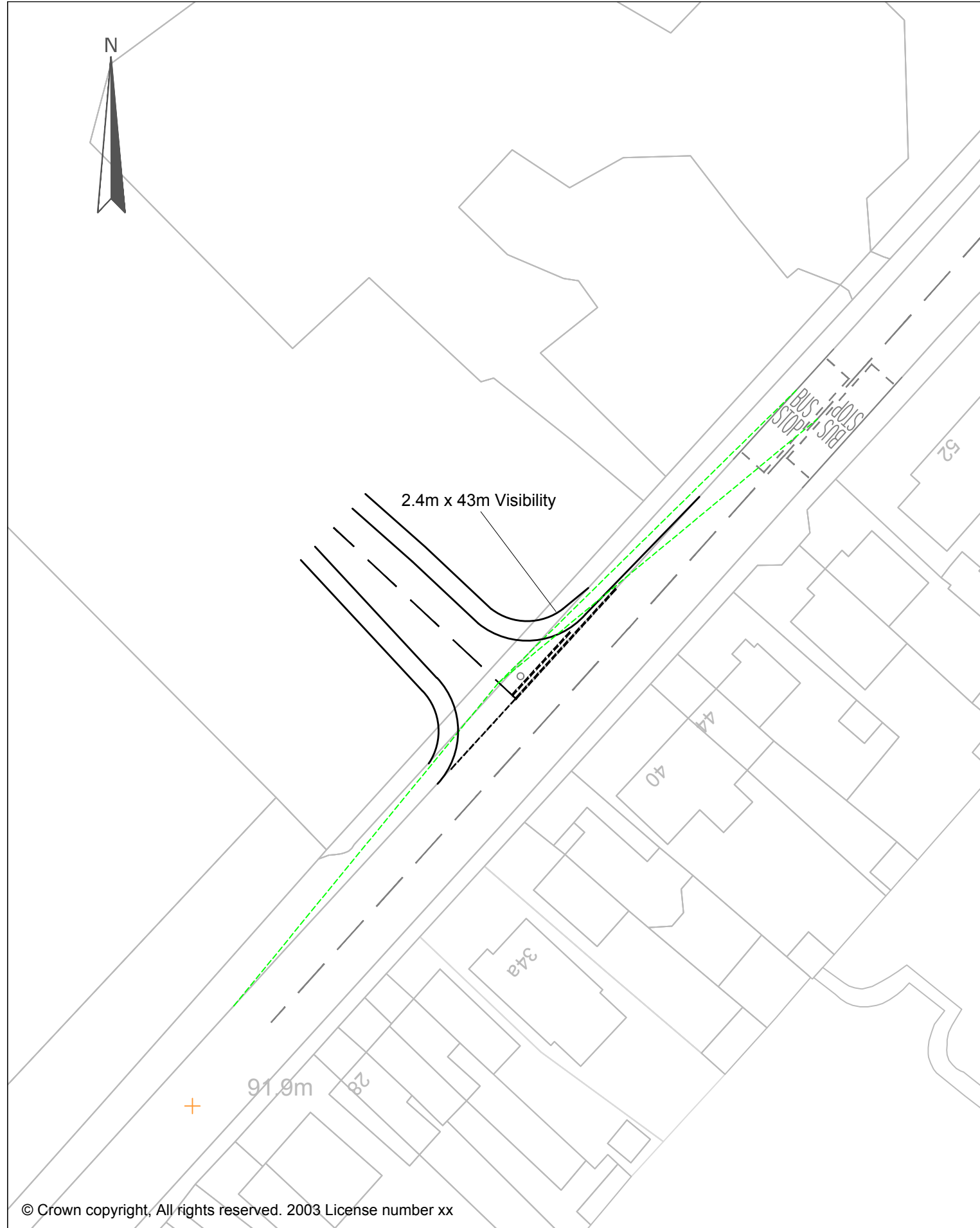
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106303

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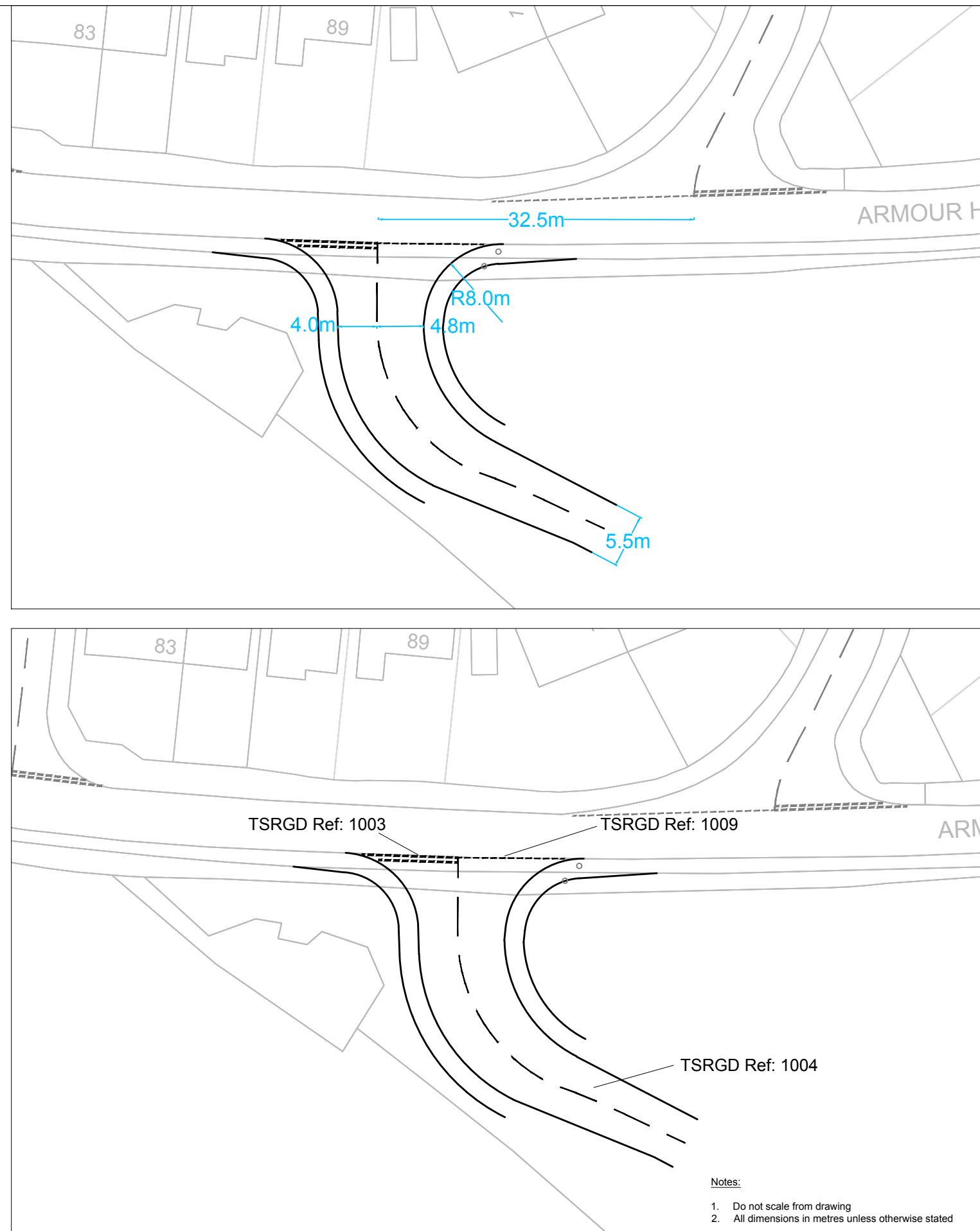
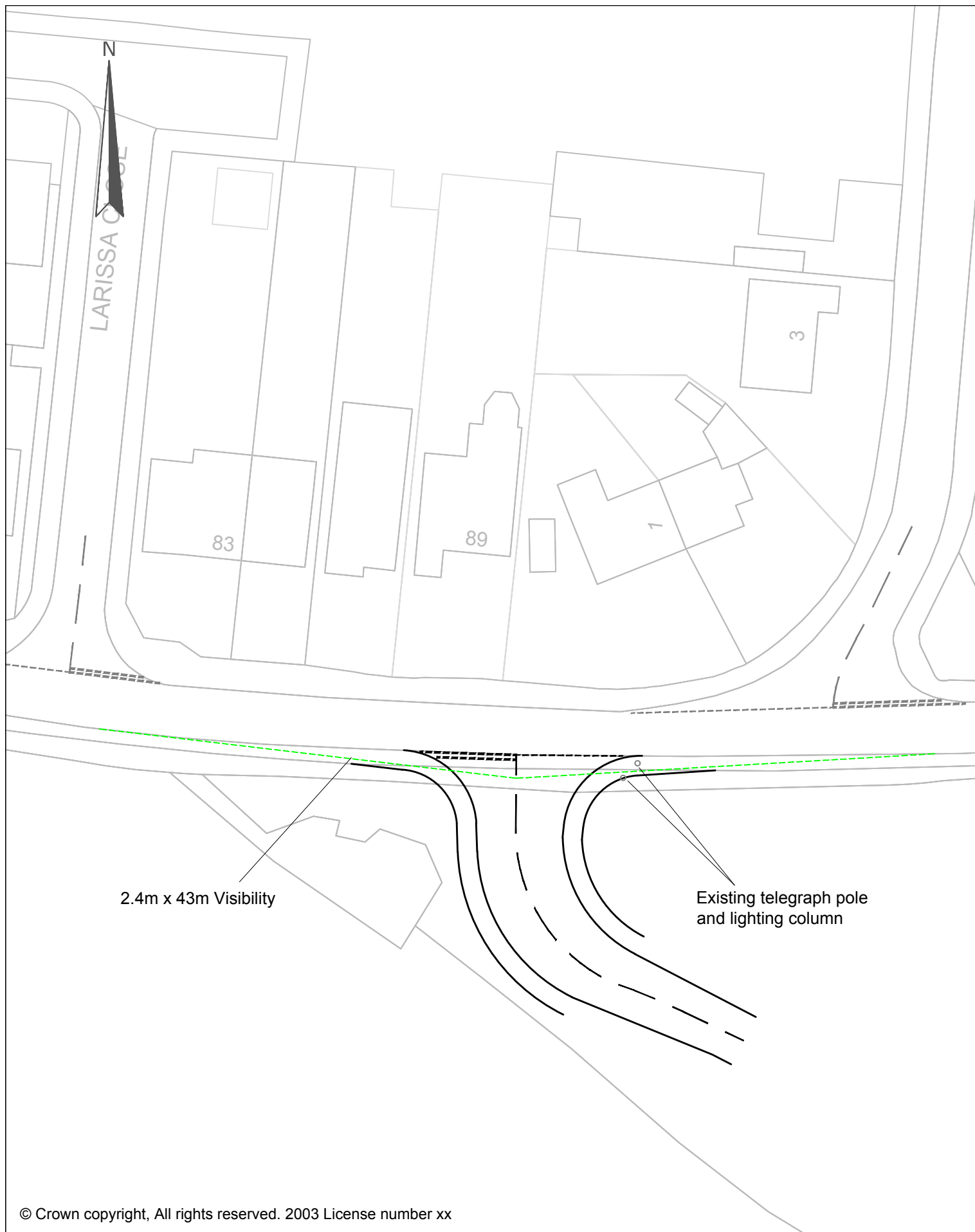
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 Fax: +44 (0)1483 755207

Drawn	SW	Information	
Checked	LT	Scale	1:500
Approved	DF	Date	17/05/17
Project Manager		Format	A3
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Project	Tilehurst, Reading	
Title	Proposed Site Access Location 1	
Drawing Number	106303-D001	Rev.



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Approved DF	Format A3	Client	
Project Manager	© This drawing is the property of SYSTRA Limited and the information can only be reproduced with their prior permission.		Drawing Number 106303-D003

APPENDIX C – SWEEP PATH ANALYSIS

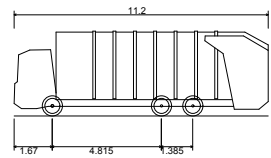
Kentwood Hill, Tilehurst

Site Access Appraisal

Report

106303

12/06/2017



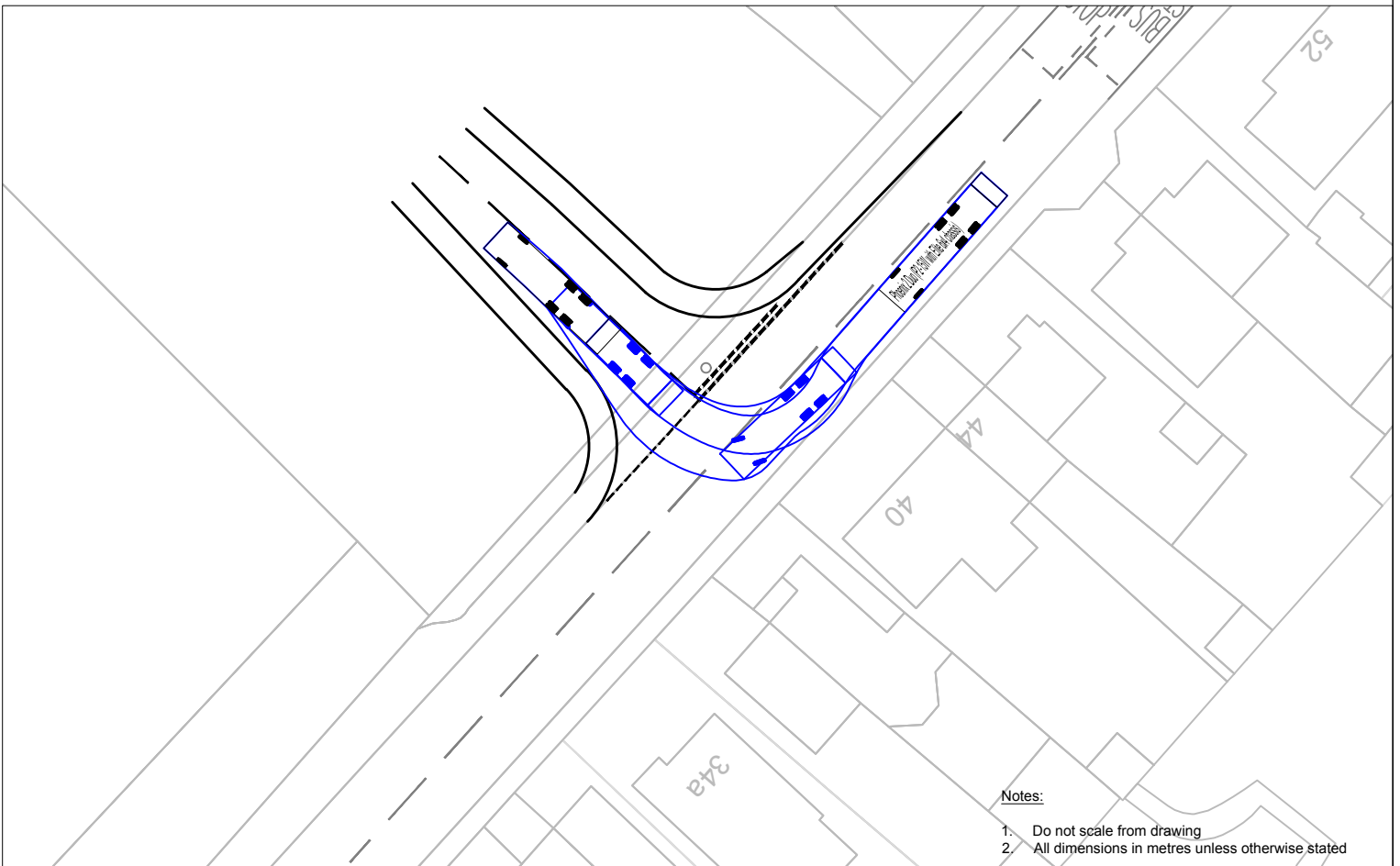
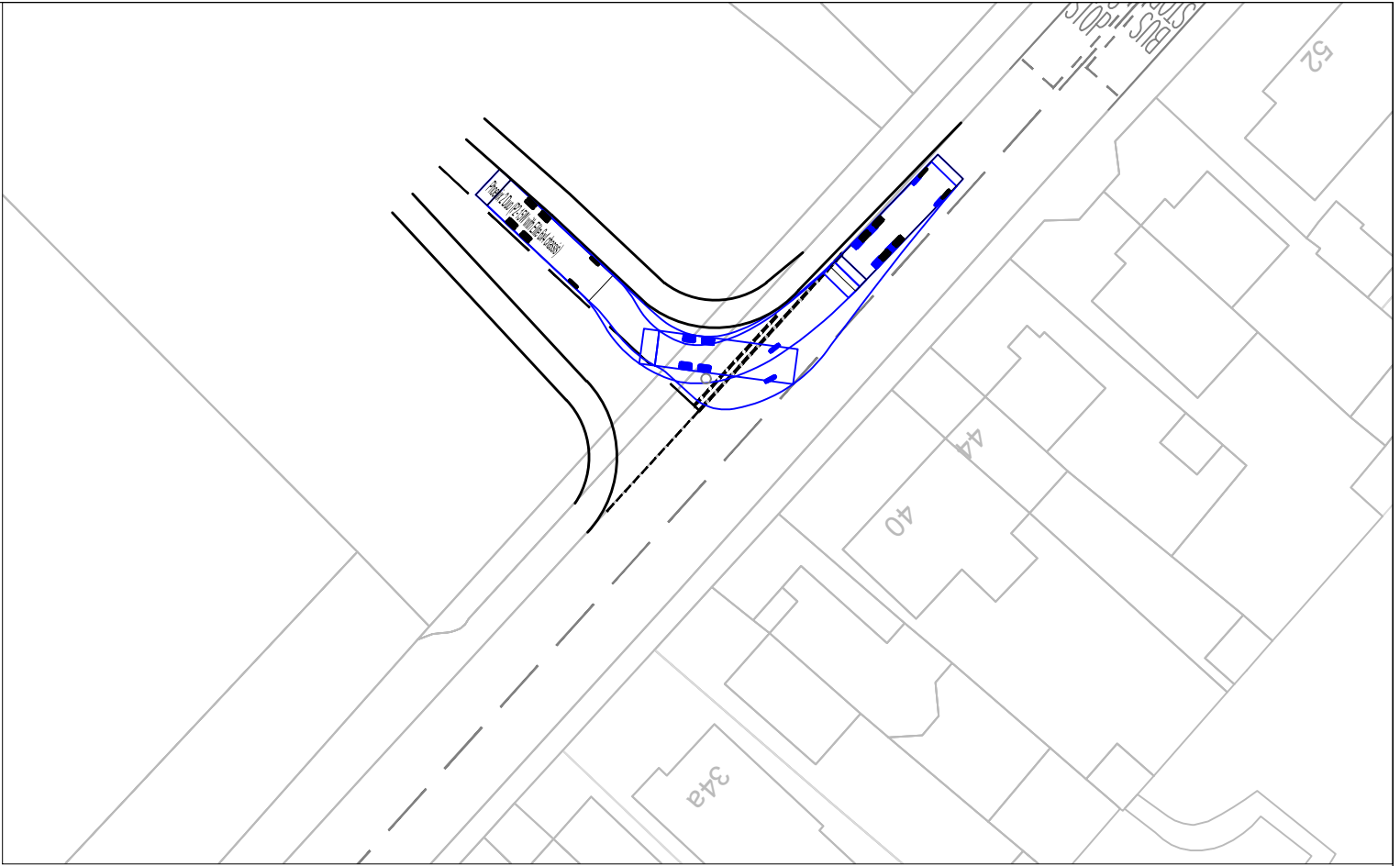
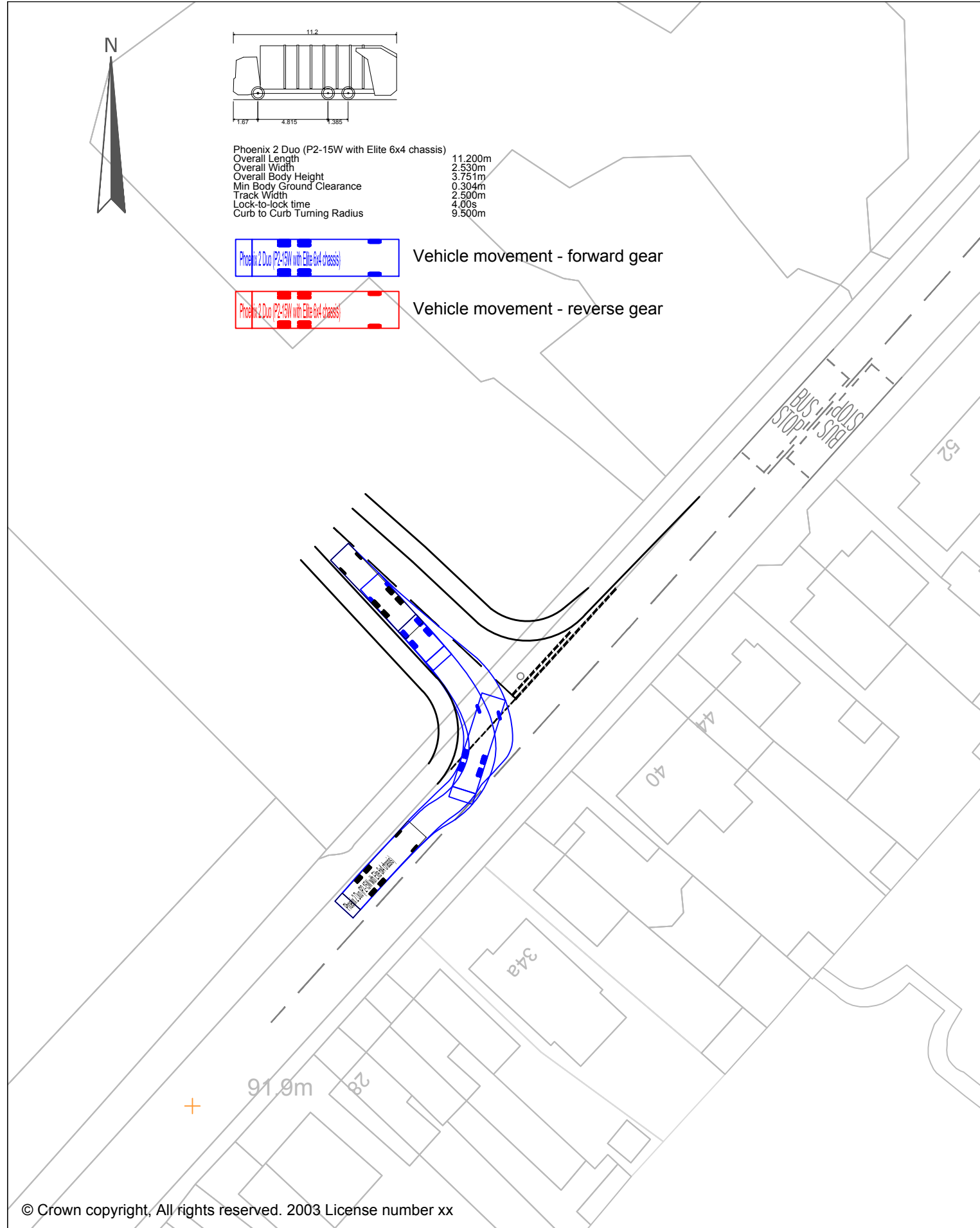
Phoenix 2 Duo (P2-15W with Elite 6x4 chassis)
 Overall Length 11.200m
 Overall Width 2.530m
 Overall Body Height 3.751m
 Min Body Ground Clearance 0.304m
 Track Width 2.500m
 Lock-to-lock time 4.00s
 Curb to Curb Turning Radius 9.500m



Vehicle movement - forward gear



Vehicle movement - reverse gear



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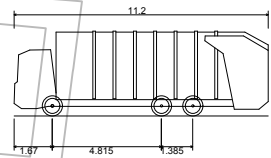
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Approved	DF	Date	17/05/17
Project Manager		Format	A3
		Client	
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Project	Tilehurst, Reading	
Title	Proposed Site Access - Location 1 Vehicle Swept Path Analysis 11.2m Refuse Vehicle	
Drawing Number	106303-D002	Rev.



Phoenix 2 Duo (P2-15W with Elite 6x4 chassis)
 Overall Length 11.200m
 Overall Width 2.530m
 Overall Body Height 3.751m
 Min Body Ground Clearance 0.304m
 Track Width 2.500m
 Lock-to-lock time 4.00s
 Curb to Curb Turning Radius 9.500m

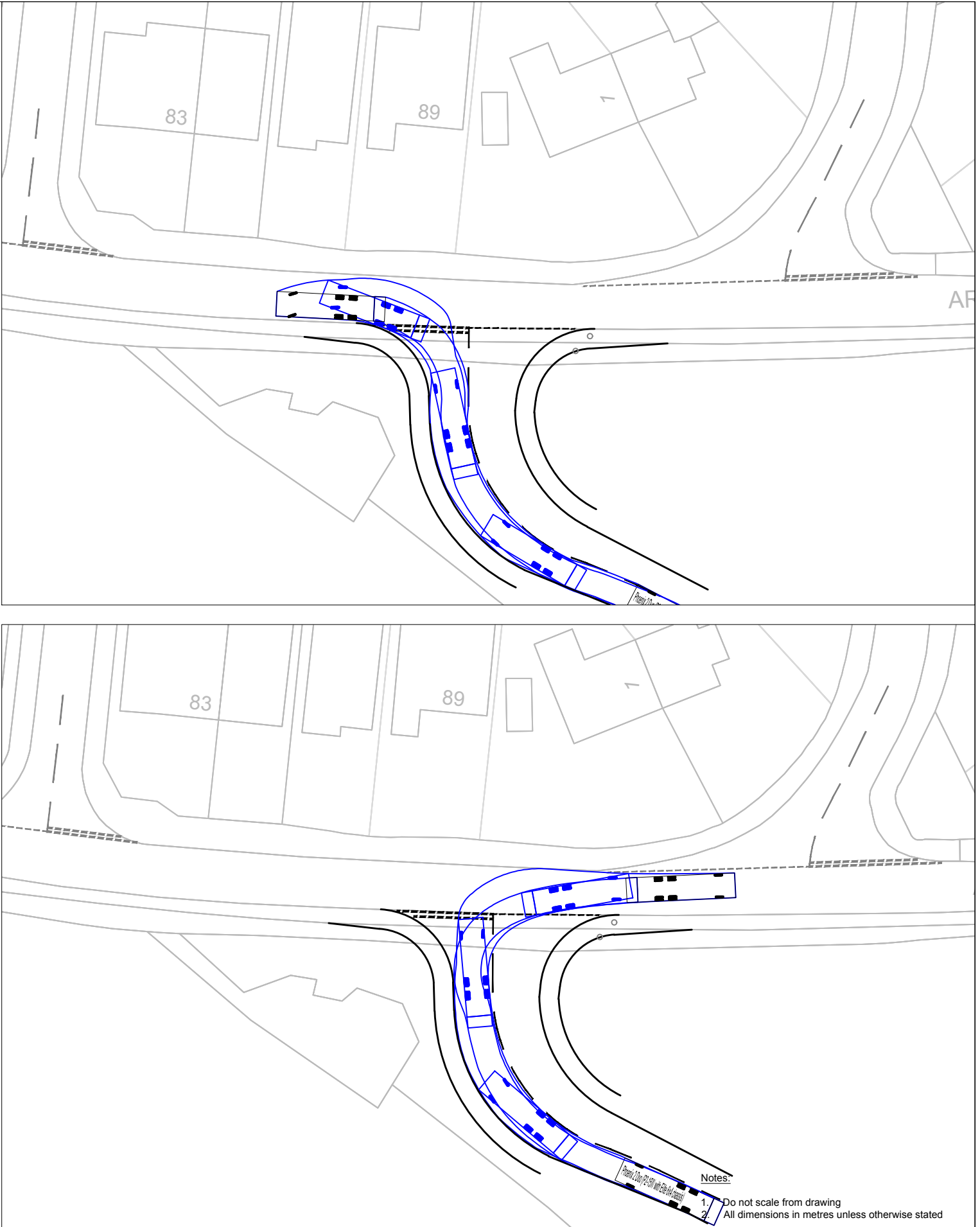
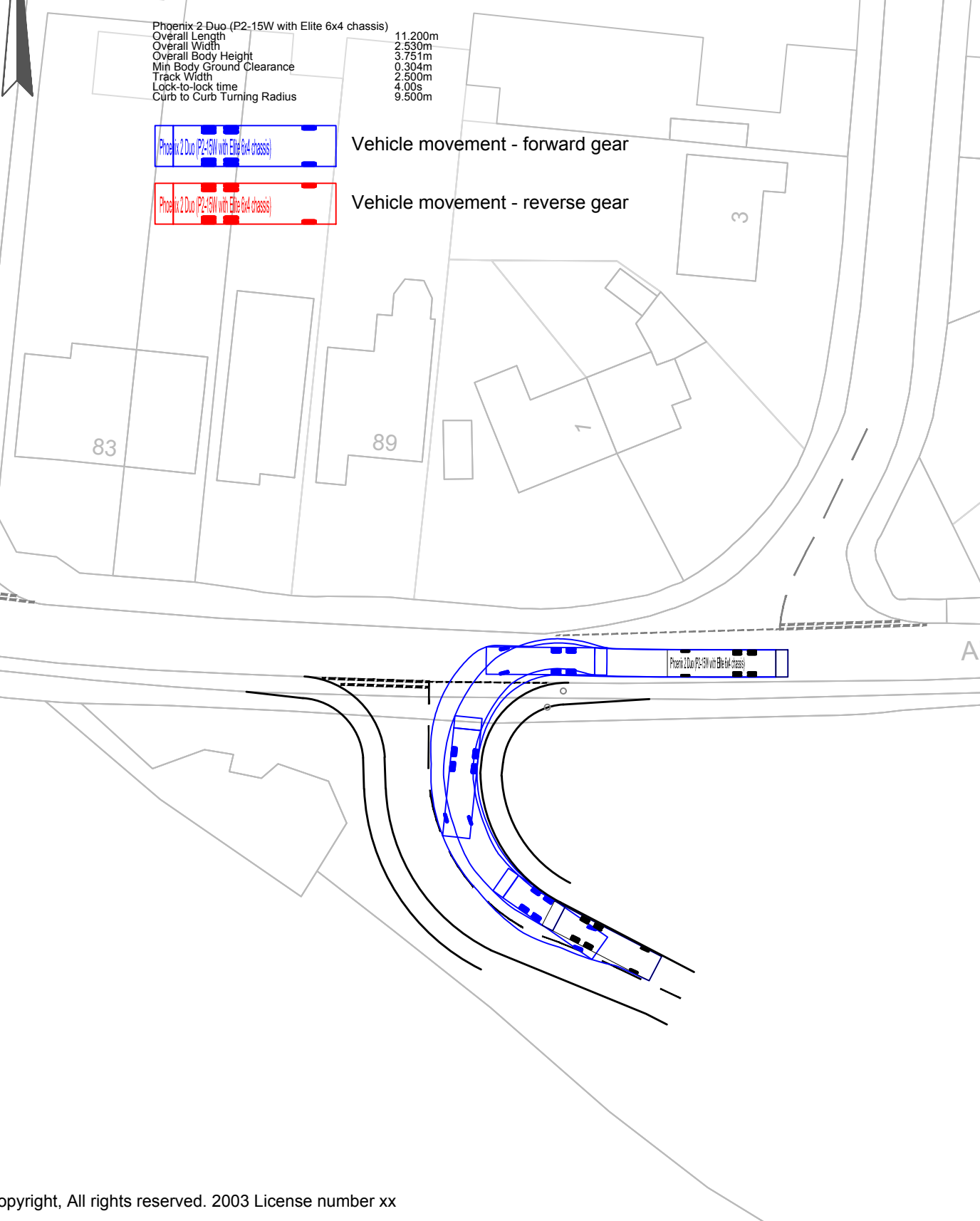


Vehicle movement - forward gear



Vehicle movement - reverse gear

LARISSA CLOSE



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Checked	LT	Scale	1:500	Date	17/05/17	
Approved	DF	Format	A3	Client	Proosed Site Access - Locaion 2 Vehicle Swept Path Analysis 11.2m Refuse Vehicle	
Project Manager	© This drawing is the property of SYSTRA Limited and the information can only be reproduced with their prior permission.			Drawing Number	106303-D004	Rev.

APPENDIX D – HIGHWAY BOUNDARY

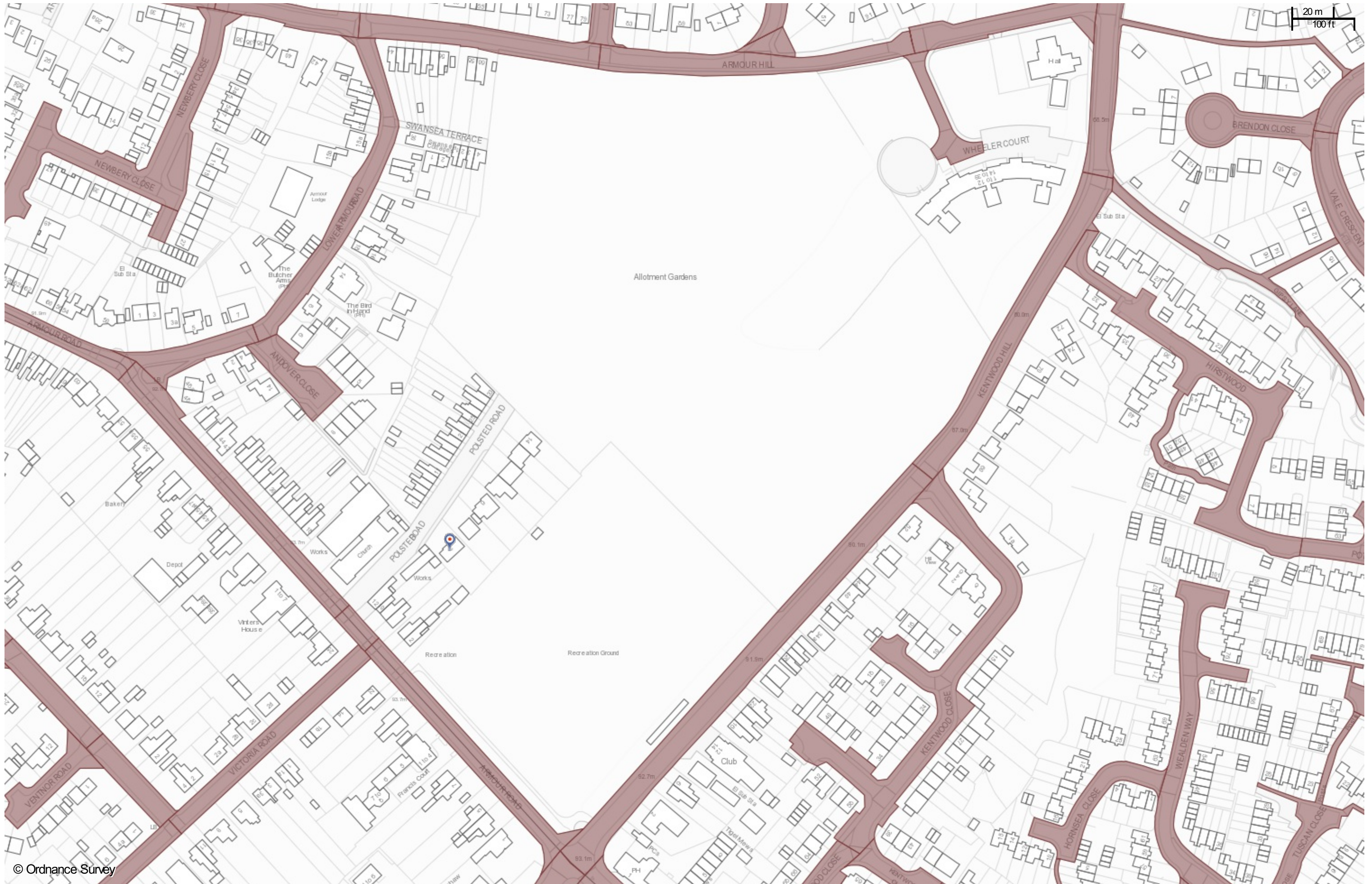
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Site Access Appraisal

Report

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12/06/2017



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The SYSTRA logo is rendered in a bold, red, sans-serif typeface. The letters are thick and blocky, with a slightly irregular, hand-drawn quality. The 'S' and 'Y' are particularly prominent, with the 'Y' having a distinctive shape. The 'A' is also bold and blocky. The overall appearance is clean and professional, consistent with a corporate brand identity.