

**TOWN AND COUNTRY PLANNING ACT 1990
APPEAL UNDER SECTION 78**

Appeal by Berkeley Homes

Against the decision by Reading Borough Council to refuse Planning
Permission for:

Demolition of existing structures and erection of a series of
buildings ranging in height from 1 to 11 storeys, including
residential dwellings (C3 use class) and retail floorspace (A3 use
class), together with a new north-south pedestrian link, connecting
Christchurch Bridge to Vastern Road

Site Address: 55 Vastern Road, Reading, RG1 8BU

Planning Inspectorate Reference No.: APP/E0345/W/21/3276463
Planning Reference No.: 200188

Statement of Case on Highway/Transport Matters

**Darren Cook of Reading Borough Council
August 2021**

Index

1.0	Introduction	Page 3
2.0	The Appeal Site	Page 5
3.0	Planning Application History	Page 6
3.1	Scoping	Page 6
3.3	Planning Submission	Page 6
3.6	Planning Application Committee	Page 6
4.0	Planning Policy and Guidance	Page 7
4.2	Reading Borough Council Local Plan (Adopted November 2019)	Page 7
4.9	Supplementary Planning Document - Reading Station Area Framework (Adopted December 2010)	Page 9
4.11	National Planning Policy Framework	Page 11
4.12	Updated National Planning Policy Framework dated July 2021	Page 12
4.13	Design guidance is also contained with of Local Transport Note 1/20, Cycle Infrastructure Design dated July 2020 and CD 195 - Designing for cycle traffic (Standards for Highways)	Page 13
5.0	The Transport Authority's Case	Page 16
5.3	Proposed North/South link directness and Switchback Ramp Alignment Rationale	Page 16
5.4	Width of North/South Link	Page 17
5.5	Southern Towpath Access	Page 18
5.6	Servicing/vehicle movements and pedestrian/cycle safety	Page 20
6.0	Conclusion	Page 23

Figures

Figure 1 - Image from Page 8 of the Berkeley Homes Strategic Shared Cycle Footway' booklet

Figure 2 - Table 5-8 from Local Transport Note 1/20, Cycle Infrastructure Design dated July 2020

Figure 3 - E/3.9 from CD 195 Designing for Cycle Traffic

Appendices

Appendix 1 - Drawing 47500/5500/011A Tracking for 12m HGV (taken from Appendix G of the appellants Transport Statement of Case)

1.0 Introduction

- 1.1 I am the Transport Development Control Manager of the Transport Strategy Department at Reading Borough Council and my duties involve giving transport observations and recommendations on planning applications. I have 15 years experience in Transport Development Control in a Local Authority setting.
- 1.2 Since joining RBC in 2006 I have provided professional input for planning applications on both transport and highways matters, taking lead of the Transport Development Control Team in 2016. The role has involved input on a wide range of planning proposals and planning appeals.
- 1.3 I have been involved in the scheme since pre-application stage in 2018 and am familiar with the appeal site, its surroundings, and its context within the Borough. I am familiar with planning policies at local and national level which are relevant to the consideration of this appeal.
- 1.4 This Statement of Case (SoC) on Transport and Highway matters has been prepared by the Highway Authority in response to the appeal under Section 78 of the Town and Country Planning Act 1990 (as amended), following the refusal by Reading Borough Council ('RBC') to grant full planning permission in respect of planning application reference 200188 by notice dated 9th April 2021.
- 1.5 The Planning Application relates to 55 Vastern Road, Reading. The description of development is as follows:

“Demolition of existing structures and erection of a series of buildings ranging in height from 1 to 11 storeys, including residential dwellings (C3 use class) and retail floorspace (A3 use class), together with a new north-south pedestrian link, connecting Christchurch Bridge to Vastern Road.” (“the Proposed Development”)

- 1.6 The Planning Application was submitted to RBC on 4th February 2020 and validated on 16th March 2020.
- 1.7 The transport and Highway matters relate to Reason for Refusal No. 1 which is outlined below:

The proposed development fails to provide a high quality north-south link through the site by virtue of related public realm, safety and directness concerns, largely due to the alignment of the site and overprovision of proposed buildings, primarily contrary to Policies CR11ii and CR11g of the Reading Borough Local Plan (2019) and guidance within the adopted Reading Borough Supplementary Planning Document Reading Station Area Framework (2010), and also Policies EN11, CC7, CR2, CR3, TR3 and TR4 of the Reading Borough Local Plan (2019).

1.8 Scope of Evidence

1.8.1 The scope of the Highway Authorities evidence is as follows:

2.0 The Appeal Site

3.0 Planning History

4.0 Planning Policy and Guidance

5.0 The Transport Authority's Case

6.0 Conclusion

2.0 The Appeal Site

- 2.1 The Old Power Station on Vastern Road forms part of the former SSE office and depot. It is bounded by the River Thames to the north, retained SSE electrical transformers and associated works to the east, Vastern Road to south and residential properties fronting Lynmouth Road to the west.
- 2.2 The site fronts onto Vastern Road which provides pedestrian footways on both sides connecting the Caversham Road / Great Brighams Mead roundabout to the west and to the Reading Bridge roundabout to the east.
- 2.3 There are currently three signalised crossings along Vastern Road all of which are of a staggered arrangement providing north/south connections.
- 2.4 South of Vastern Road, Trooper Potts Way provides access to the northern station entrance and the station underpass which leads to the main station entrance on the southern side and in turn the town centre.
- 2.5 To the north of the site, the Thames Path lines the southern side of the River Thames which leads to Reading Bridge, Kings Meadows, Tesco to the east and Caversham Bridge and Caversham centre to the west. Christchurch Bridge is located centrally along the northern boundary of the site and provides a pedestrian and cycle connection to the northern side of the river.
- 2.6 The site has a range of existing cycling facilities available to the future occupiers of the site with access to local on and off road routes and the national cycle network.
- 2.7 Locally to the site, the northern footway on Vastern Road provides a shared footway / cycleway facility past the southern site boundary from Lynmouth Road to Reading Bridge to the east.
- 2.8 Norman Place to the east of the site currently provides the off-road cycle link from Vastern Road to the Christchurch Bridge over the River Thames which in turn leads to the cycle routes through Christchurch Meadows and Hills Meadow.
- 2.9 National Cycle Network (NCN) 5 is directly accessible from the northern boundary of the site along the Thames Path. This route connects the site with Caversham to the west via Christchurch Bridge, and Thames Valley Business Park to the east. To the east NCN 5 joins NCN 4 where the River Thames and Kennett meet. NCN 4 dissects the Reading area connecting Theale in the west through to Sonning and Charvil in the east.

3.0 Planning Application History

Scoping

- 3.1 A Transport Assessment Pre-Application / Scoping Note Reference 45152-TN01 was submitted to Reading Borough Council in January 2019 with respect to a residential development at the site for up to 240 new homes.
- 3.2 A formal pre-application meeting was held between the applicant and Reading Borough Council officers on the 3rd October 2019 to confirm agreement to the scope of the transport assessment.
- 3.2 During the discussions the Highway Authority agreed with the principles of a significantly lower than maximum policy requirement for car parking at the site given its highly sustainable location in terms of accessibility. However, numerous matters were outstanding that included the north south pedestrian cycle route through the application site and how deliveries would interact with this route.

Planning Submission

- 3.3 The planning application was submitted on 4th February 2020 and was accompanied by a Transport Statement and a Residential Travel Plan.
- 3.4 During the course of the determination of the application further Technical Responses were submitted by the applicant to address points raised by the Highway Authority. The Technical Responses therefore sought to justify the proposed design or provided design / layout alterations to address the Highway Authority concerns.
- 3.5 The responses submitted by the applicant were as follows:
 - TN003: 'Pedestrian and Cycle Connection to Christchurch Bridge' (8th June 2020).
 - TN004: 'RBC Highway Response' (9th June 2020)
 - TN005: 'RBC Highway 2nd Response' (9th September 2020)
 - TN006: 'RBC Highway 3rd Response & Vastern Road Crossing' (17th September 2020)

Planning Application Committee

- 3.6 The full planning application for 209 new residential homes was taken to RBC's Planning Applications Committee on 31st March 2021. The outcome of the committee was a refusal of the application.

4.0 Planning Policy and Guidance

Local Planning Policy and Supplementary Planning Guidance

4.1 The Local Transport Policies relevant to Transport and Highways are contained within the Reading Borough Council Local Plan, which was adopted in November 2019. A Supplementary Planning Document for the area surrounding and including the application site also exists and is entitled the Reading Station Area Framework (Adopted December 2010). A review of the relevant Policies and how the development fails to comply with them is provided below:

4.2 Reading Borough Council Local Plan (Adopted November 2019)

4.2.1 Policy TR1 ACHIEVING THE TRANSPORT STRATEGY states:

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.

4.3 Policy TR3 ACCESS, TRAFFIC AND HIGHWAY-RELATED MATTERS states:

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:-

- 'i) Accesses and works to the highway comply with the adopted standards of the Transport Authority;*
- ii) The development would not have a material detrimental impact on the functioning of the transport network;*
- iii) The proposals would not be detrimental to the safety of users of the transport network, including pedestrians and cyclists;*

- iv) *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*
- v) *For non-residential uses, or new dwellings on classified roads, off-street servicing would be provided.'*

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.

4.4 Policy TR4 CYCLE ROUTES AND FACILITIES states:

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.

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.

4.5 The development includes the provision of a north south route through the site that requires the need for delivery vehicles to reverse over the route **which would be to the detriment of the safety of pedestrians and cyclists utilising the route.** The route has also not been designed taking account of the National Design Standards and so has not made full use of opportunities to improve access for cyclists.

4.6 The scheme therefore does not comply with Policies TR1, TR3 AND TR4 in this regard.

4.7 Policy CR2 DESIGN IN CENTRAL READING states:

Applications for development within Central Reading should demonstrate the following attributes:

CR2 Part b 'Development will provide appropriate, well designed public spaces and other public realm, including squares, open spaces, streetscape, utilising high quality and well-maintained hard and soft landscaped areas, and public art, that provide suitable functions and interest, sense of place and safe and convenient linkages to adjoining areas.'

4.8 Policy CR11 STATION/RIVER MAJOR OPPORTUNITY AREA states:

Development in the Station/River Major Opportunity Area will:

- CR11 part ii) *Help facilitate greater pedestrian and cycle permeability, particularly on the key movement corridors. North-south links through the area centred on the new station, including across the IDR, are of particular importance;*
- CR11 part v) *Provide additional areas of open space where possible, with green infrastructure, including a direct landscaped link between the station and the River Thames;*

4.8.1 Policy CR11 continues in the form of CR11g RIVERSIDE which states:

Development should maintain and enhance public access along and to the Thames, and should be set back at least ten metres from the top of the bank of the river. Development should continue the high quality route including a green link from the north of the station to the Christchurch Bridge, with potential for an area of open space at the riverside. The main use of the site should be residential, although some small-scale leisure and complementary offices will also be acceptable. Development should take account of mitigation required as a result of a Flood Risk Assessment.

4.8.2 Further clarity on Policy CR11 is provided at paragraph 5.4.6 of the Local Plan which states the following:

The successful development of this area hinges on improved accessibility by public transport, and improved permeability for pedestrians and cyclists. In terms of permeability, improving links for pedestrians and cyclists through the centre, particularly in a north-south direction, is one of the key principles for the spatial strategy of the centre, along with removing barriers to access within the centre. If visual links are also provided, this will help change the perception of the area north of the station as a separate entity. The opening of the underpass under the station and the provision of a new pedestrian and cycle bridge over the Thames have recently helped to achieve this vision, but further improvements can still be made. Ensuring active frontages along these routes will assist these to become attractive links, as will the provision of new areas of open space. This is particularly important on the route between the shopping core, the station and the Thames. In particular, on the Riverside site (CR11g), achieving this north-south link is the main priority for the site, and this should be given substantial weight in development management.

4.8.3 Policies CR2 and CR11 therefore provide clarity on the route required through the application site which should be a high quality direct landscaped link and that '*achieving this north-south link is the main priority for the site*'. The design does not meet these policy objectives fully and therefore does not comply.

4.9 Supplementary Planning Document - Reading Station Area Framework (Adopted December 2010)

4.9.1 The purpose of the Reading Station Area Framework is to outline broad development principles in a supplementary planning document to guide the planned redevelopment of the area, individual sites, the public realm, and new transport infrastructure. The relevant sections of the Framework are as follows.

4.9.2 Paragraph 3.6 of the RSAF states that:

The redevelopment of large sites provides the opportunity to secure landscaped public space and to extend public access. The layout of these will incorporate east-west and north-south routes to enhance movement and linkages across the area, whilst the construction of a pedestrian/cycle bridge linking the Area to Christchurch Meadows will further integrate and ensure good accessibility to adjoining open spaces.

- 4.9.3 Paragraph 5.4 of the RSAF states that the overall aim is to improve the Station Area public realm by creating, improving and connecting public spaces. More detailed aims are provided and include:

Creating more opportunities for sustainable forms of transport, particularly walking and cycling, by enhancing the connectivity and legibility of the area.

- 4.9.4 Paragraph 5.6 of the RSAF identifies ten key public realm priority projects. The application site is found within the area defined as the Kennet/Thames Spine and its priorities are clarified further in Paragraph 5.9, see below:

A major 'city spine' - a direct pedestrian route - is proposed through the historic core, the Station Area and through to the Thames. This spine is based on the north-south link which is the most significant movement corridor in the RCAAP, and is vital to the success of development in this area. The spine will extend across the Thames with a new footbridge(s) and new riverside parks, which can act as amenity space for new residents. The spine will include enhancements including wider pavements and greater pedestrian priority in Station Road. North of the railway, the spine will incorporate a 'green link' towards the river. Buildings will face onto the spine rather than away from it, and, on all parts of the spine south of Vastern Road, the frontages will be enlivened with active uses including retail and leisure.

- 4.9.5 Paragraph 7.10 of the RSAF addresses views within the Framework area and provides clarity on the north-south link by clarifying that:

The new development will result in new views being opened up within the Station Area itself. Of particular significance are views along the direct north-south link, between the Station and the Thames, where there should be an unbroken line of sight.

- 4.9.6 Paragraph 11.10 of the RSAF sets out the design principles in respect of transport and states:

High-density mixed-use development in the Station Area will maximise the potential for local walking and cycling trips. The framework will help to secure high quality pedestrian and cycle facilities to include routes that are direct, well lit, naturally surveilled and safe.

- 4.9.7 The cycling strategy of the RSAF is discussed in Paragraph 11.24 and outlines that:

Reading Borough Council's Cycling Strategy seeks to improve cycle links to Reading Station and interchange and to improve cycle crossings of and travel on the IDR. Development in the Station Area provides an excellent opportunity to achieve these aims. In particular, the development of the Northside area can provide new cycle links approaching the northern Station entrance, potentially separated where necessary. These should link in with the route network shown on the map accompanying the Cycling Strategy, and improve north-south crossing of Vastern Road.

4.9.8 The RSAF builds upon the Policies contained within the Reading Borough Local Plan and clarifies the design principles that the north-south should adhere to. The route is to be a high quality, well lit, safe provided with natural surveillance and is to be direct, which has been clarified as being along an unbroken line of sight. The design does not meet all of these design requirements and therefore is not compliant with the RSAF.

4.10 The National Planning Policies relevant to Transport and Highways are contained within Section 9 - Promoting sustainable transport of the National Planning Policy Framework dated July 2021. A review of the relevant Policies and how the development fails to comply with them is provided below:

4.11 National Planning Policy Framework

4.11.1 Paragraph 110 of the National Planning Policy Framework states that when assessing development sites, they should ensure that:

- a) appropriate opportunities to promote sustainable transport modes can be - or have been - taken up, given the type of development and its location;*
- b) safe and suitable access to the site can be achieved for all users;*
- c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code 46; and*
- d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.*

4.11.2 Paragraph 111 continues to stipulate that:

Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

4.11.3 Further clarity is provided in this regard at Paragraph 112 where it specifies that:

Within this contest, applications for developments should:

- a) *give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second - so far as possible - to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;*
- b) *address the needs of people with disabilities and reduced mobility in relation to all modes of transport;*
- c) *create places that are safe, secure and attractive - which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;*
- d) *allow for the efficient delivery of goods, and access by service and emergency vehicles; and*
- e) *be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.*

4.11.4 The proposed development does not comply with Paragraphs 110 and 112 given that the design of the north-south link has not been given first priority in its alignment between Vastern Road and Christchurch Bridge, its gradient between Vastern Road and the river Thames and it will result in service / delivery vehicles reversing over the pedestrian / cycle route. The development is therefore to the detriment of Highway Safety and the residual impact of the development would be severe given that the north south route has not been designed in accordance with the local and national design standards. The proposed development is also therefore in conflict with Paragraph 111 of the National Planning Policy Framework.

4.12 Updated National Planning Policy Framework dated July 2021

4.12.1 The National Planning Policy Framework was updated on 20th July 2021 and this section deals with the policy changes within Section 9. Promoting Sustainable Transport.

4.12.2 Two changes have been made to Section 9 and these relate to Paragraphs 106 and 110.

4.12.3 Paragraph 106 has been revised at point d with the new wording relating to the provision of cycle networks being attractive and well designed, the full text of the 2019 and 2021 versions can be found below.

2019 version of the National Planning Policy Framework

d) provide for high quality walking and cycling networks and supporting facilities such as cycle parking (drawing on Local Cycling and Walking Infrastructure Plans);

2021 version of the National Planning Policy Framework

*d) provide for **attractive and well-designed** walking and cycling networks and **with** supporting facilities such as **secure** cycle parking (drawing on Local Cycling and Walking Infrastructure Plans);*

(revised text is highlighted)

4.12.4 The change to Paragraph 106 does not alter the view of the Highway Authority given that the design of the footway / cycleway does not comply with the design requirements specified within National Design Standards and as such cannot be described as being well designed.

4.12.5 The change to Paragraph 110 Considering Development Proposals now includes the following at subsection c:

c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code

4.12.6 This addition now specifically identifies certain design standards that the development must accord to as well as National Guidance. The assessment of the planning application has taken account of National Guidance but it has been noted that both the National Design Guide and the National Model Design Code stipulate that new pedestrian and cycle routes through developments should be direct.

4.12.7 Further assessment of the proposed development against the National Design Guide and the National Model Design Code are dealt with separately to this report.

4.13 Design guidance is also contained with of Local Transport Note 1/20, Cycle Infrastructure Design dated July 2020 and CD 195 - Designing for cycle traffic (Standards for Highways) specific sections of each are as follows:

4.13.1 Local Transport Note 1/20, Cycle Infrastructure Design dated July 2020, which is included within the Councils questionnaire documentation, states the following at Paragraph 18 of Section 1.6 Summary Principles and continues at Paragraphs 4.2.2 and 4.2.7:

Section 1.6 Summary Principles:

18) Cycle routes must flow, feeling direct and logical.

Users should not feel as if they are having to double back on themselves, turn unnecessarily, or go the long way round. Often, cycling schemes - when crossing a main road, for instance - require cyclists to make a series of ninety-degree turns to carry out a movement that a motor vehicle at the same location could do without turning at all. Schemes should be based on a proper understanding of how people actually behave rather than how they might be expected to behave.

4.2.2 When people are travelling by cycle, they need networks and routes that are:

- Coherent;*
- Direct;*
- Safe;*
- Comfortable; and*
- Attractive*

4.2.7 Directness is measured in both distance and time, and so routes should provide the shortest and fastest way of travelling from place to place. This includes providing facilities at junctions that minimise delay and the need to stop. Minimising the effort required to cycle, by enabling cyclists to maintain momentum, is an important aspect of directness. An indirect designated route involving extra distance or more stopping and starting will result in some cyclists choosing the most direct, faster option, even if it is less safe.

4.13.2 Local Transport Note 1/20, Cycle Infrastructure Design also stipulates the required standards in respect of gradients for cycle infrastructure and the acceptable gradients and maximum lengths these gradients can extend can be found at Figure 2 below.

Figure 2

Table 5-8: Maximum length for gradients

Gradient %	Desirable maximum length of gradient (m)
2.0	150
2.5	100
3.0	80
3.5	60
4.0	50
4.5	40
5.0	30

4.13.3 Further guidance is given in relation to acceptable widths along Towpaths at Paragraph 8.2.2, which can be found below. This guidance provides sufficient evidence to stress that the Towpath could be permitted to allow cycling along its length. This only strengthens the Highway Authorities argument that the route between the development and the Towpath should be designed to accommodate cyclists so as to provide a suitable link between them.

8.2.2 *Providing sufficient width for the anticipated levels of use will help minimise the risk of conflict between different user groups. Existing heritage features such as canal towpaths should not be excluded from a network solely due to width or headroom restrictions, unless there are serious safety concerns.*

4.13.4 CD 195 - Designing for cycle traffic (Standards for Highways) also stipulates the required National Standards in respect of gradients for cycle infrastructure and the acceptable gradients and maximum lengths these gradients can extend can be found at Figure 3 below.

Figure 3

Longitudinal gradients

E/3.9

Cycle track gradients shall be provided in accordance with Table E/3.9.

Table E/3.9 Maximum length for gradients

Gradient	Maximum length of gradient (metres)
2.0%	150
2.5%	100
3.0%	80
3.5%	60
4.0%	50
4.5%	40
5.0%	30

4.13.5 It should be clarified that the Council's questionnaire submission included two separate versions of CD 195 - Designing for cycle traffic (Standards for Highways). It is clarified that the 'Revision 1' version of the document dated March 2020 was considered when referencing the document within the officer committee report at application stage. Since this was produced, version 1.0.1 dated March 2021 has been published, which is considered at appeal stage. It is clarified that the relevant section of the document, as referenced at paragraph 4.13.48 of the officer committee report, remains the same in the March 2021 adopted document.

5.0 The Transport Authority's Case

5.1 Reason for refusal No. 1 covers several areas of concern to the Highway Authority which are addressed in detail below. For clarity Reason for Refusal (RfR1) states the following:

The proposed development fails to provide a high quality north-south link through the site by virtue of related public realm, safety and directness concerns, largely due to the alignment of the site and overprovision of proposed buildings, primarily contrary to Policies CR11ii and CR11g of the Reading Borough Local Plan (2019) and guidance within the adopted Reading Borough Supplementary Planning Document Reading Station Area Framework (2010), and also Policies EN11, CC7, CR2, CR3, TR3 and TR4 of the Reading Borough Local Plan (2019).

5.2 Given the varying areas of concern regarding the proposal these have been broken down into individual sections as indicated below:

- **Section 5.3** - Proposed North-South link directness and appropriateness and Switchback ramp alignment rationale
- **Section 5.4** - North-South link width
- **Section 5.5** - Southern towpath access
- **Section 5.6** - Servicing/vehicle movements and pedestrian/cycle safety

5.3 Proposed North/South link directness and Switchback Ramp Alignment Rationale

5.3.1 The Policy requirements for the north south link are particularly clear in their description to ascertain the appropriate design for the route with the main features described below:

- Achieving this north-south link is the main priority for the site, and this should be given substantial weight in development management. (Local Plan Policy CR11g)
- Provide additional areas of open space where possible, with green infrastructure, including a direct landscaped link between the station and the River Thames (CR11 part v)
- Of particular significance are views along the direct north-south link, between the Station and the Thames, where there should be an unbroken line of sight. (Para 7.10 of the RSAF)
- High-density mixed-use development in the Station Area will maximise the potential for local walking and cycling trips. The framework will help to secure high quality pedestrian and cycle facilities to include routes that are direct, well lit, naturally surveilled and safe. (Para 11.10 of the RSAF)

5.3.2 The Policy design criteria for a direct route is being dealt with under a separate response however directness is also addressed at Paragraphs 4.2.2 and 4.2.7 of Local Transport Note 1/20, Cycle Infrastructure Design dated July 2020, which can be found at paragraph 4.13.1 of this Statement.

- 5.3.3 The National design criteria for such a route is therefore also clear in its interpretation of the meaning direct, given that the shortest and fastest way of travelling from place to place would be a straight line. Given this is a comprehensive redevelopment of the site it is evident that the proposal does not fully accord with this criteria as the fastest route through the site has not been designed.
- 5.3.4 The switch back design follows on from the assessment of the directness of the route through the development site. The Highway Authority again refers to Local Transport Note 1/20 Cycle Infrastructure Design dated July 2020 which provides design guidance in relation to the proposed switchback design specifically at Paragraph 18 of Section 1.6 Summary Principles, as detailed at Paragraph 4.13.1 above.
- 5.3.5 The design criteria stipulates the requirement for routes should not make users feel as if they are having to double back on themselves and in their own right do not provide a direct route. This is specified in Paragraphs 4.2.2 and 4.2.7 of Local Transport Note 1/20 Cycle Infrastructure Design dated July 2020, as detailed at Paragraph 4.13.1 above.
- 5.3.6 The introduction of the switch back design is in fundamental noncompliance with these National design standards. The effects are rendered more severe by the lack of a direct route through the site.
- 5.3.7 As such, the proposal is contrary to Paragraph 112 of the National Planning Policy Framework which states that development should give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas (See Paragraph 4.11.3). This is not just when compared with vehicle movements travelling through development, but is in relation to the design of schemes so that the movement of pedestrians and cyclists is at the forefront of the design, ensuring that direct routes are provided.
- 5.3.8 In addition, Paragraph 112 continues to state that development should create places that are safe, secure and attractive which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards. The development does not comply with any of the design standards specified within the Local Plan, the Reading Station Area Framework, Local Transport Note 1/20 Cycle Infrastructure Design dated July 2020, as well as the National Design Guide and the National Model Design Code specifically identified within the National Planning Policy Framework. As such, the development would result in a severe impact in that regard.
- 5.3.9 The non-direct route through the site also results in HGVs having to reverse over the pedestrian / cycleway to the detriment of highway safety whereas a more direct route would significantly reduce / remove this impact. Further comments in relation to HGV movements is found from Paragraph 5.6 below.

5.4 Width of North/South Link

5.4.1 The width of the route complies with the technical requirements of a shared pedestrian / cycleway and therefore is acceptable from a transport perspective although I am aware that there are other aspects of the width to which my colleagues have concern. These concerns are raised separately to this report.

5.5 Southern Towpath Access

5.5.1 The submitted scheme includes a new additional route between the site and the Towpath as requested during the pre-application discussions. The appellant's Statement of Case has stated that

The planning submission material explained that the path connecting the Appeal site to the southern River Thames towpath would be a pedestrian footpath complying with accessibility criteria for wheelchair users.

5.5.2 However at page 8 of the Berkeley Homes Strategic Shared Cycle Footway' booklet which can be found at Document 6.67 of the Appellant's submission, it is illustrated within the below diagram that the route between the application site and the Towpath is a pedestrian / cycle route. The text explains that the gradient of this route would be 1:21 (4.76%) or less.

Figure 1

Access and Movement

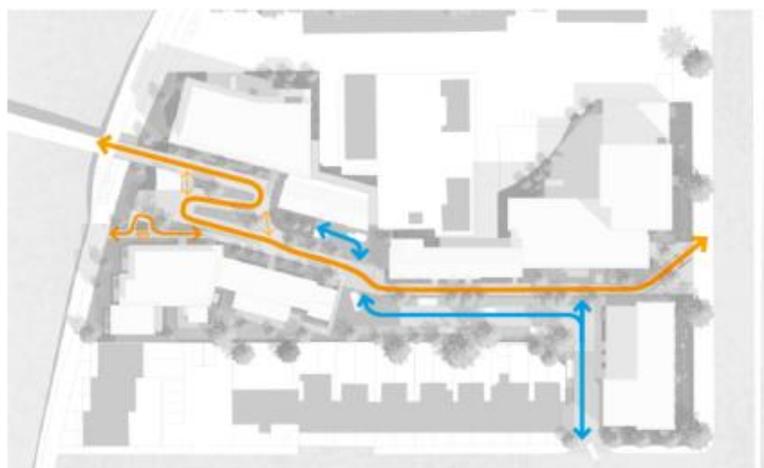
Through the central part of the site sits a dedicated 3m wide cycle footway, flanked by landscaped elements and tree planting. This route connects the town centre from Western Road, through to the Thames Towpath and Christchurch Bridge to the north.

With the changes in level between the site, towpath and Christchurch Bridge, gentle deviations are introduced to the routes to maintain a DDA-compliant route at 1:21 or less throughout the site. This is supplemented through the introduction of shorter and more direct, stepped pedestrian routes that provide a more convenient pedestrian journey. These more direct pedestrian routes, should also reduce the number of pedestrians using the cycle footway through the meandering section.

As the dedicated cycle footway runs through the centre of the scheme, we have introduced a switchback as a speed calming measure for cyclists. The switchbacks themselves widen to 4m to provide safe manoeuvring space for all users.

Vehicles access the site through Lynnmouth Road.

-  3m wide Foot / Cycleway to / from Christchurch Bridge
-  Foot / Cycleway to / from the Thames Towpath
-  Additional stepped routes
-  Vehicular Route



5.5.3 Irrespective of the above the gradients specified on the detailed design drawings include gradients of between 1:14.5 and 1:15 which do not comply with Figures 2 or 3 taken from Local Transport Note 1/20, Cycle Infrastructure Design dated July 2020 and CD 195 Designing for cycle traffic respectively. These tables can be found at Paragraph 4.13.2 and 4.13.4 of this Statement. The gradient of the route therefore would not comply with the National Design Standards for a cycle route.

5.5.4 Given the proposed gradient the Appellant now stipulates in contradiction to Figure 1 above that the route to the Towpath is solely for the use of pedestrians and as such it is claimed that the gradients of 1:14.5 and 1:15 are acceptable. However, it should be stated that in relation to these gradients Section 3.2 of Department for Transport document Inclusive Mobility states the following:

1% (1 in 100) - is never an obstacle.

2% (1 in 50) - can be managed by most people (and also provides good drainage).

2.5% (1 in 40) - can be managed by many people.

Steeper than 2.5% - impossible for many manual wheelchair users.

These figures may be regarded as a counsel of perfection as the terrain in many places imposes steeper gradients than 2.5 per cent, but the standard of 5 per cent should be borne in mind when designing new footpaths and pedestrian areas.

5.5.5 The figures specified above equate to a gradient of 1:40 and 1:21 respectively and as such the proposed gradients of between 1:14.5 and 1:15 (6.9% and 6.6% respectively) would be in excess of this requirement. Although lesser gradients are accepted within Inclusive Mobility this is a comprehensive redevelopment of a site that is relatively flat in its terrain and as such the gradient of 1:21 should be adhered to throughout the site.

5.5.6 It is also noted that Inclusive Mobility specifies at Paragraph 8.4.2 that the rise of the ramp should not exceed 333mm however the 1:15 gradient ramp provides a rise of 345mm. This may be a minimal variance but this is contrary to the stringent design requirements that a route should adhere.

5.5.7 Irrespective of the above the Highway Authority do not agree that this route should be pedestrian only as it will provide cycle access from the cycle route along Vastern Road to the Towpath along the River Thames. To the east of this point of access is National Cycle Network Route 5 and therefore this route would become the desire line between NCN Route 5 / the Towpath and the town centre, as such the route must be designed to accommodate cyclists.

- 5.5.8 The Councils Local Cycling and Walking Improvement Plan (LCWIP) also identifies the Towpath as being dedicated as a cycle route in the future with work ongoing in relation to its dedication and therefore it is imperative that this link is suitable for cyclists. It is also anticipated that once the route through the site is opened it will form the main route between the Town Centre and the Towpath itself, as opposed to the existing route along Norman Place. By not providing a link that connects to the Towpath the development does not comply with Point d of Paragraph 106 of the National Planning Policy Framework, the full extract of this can be found at Paragraph 4.12.3 of this Statement.
- 5.5.9 The appellant has claimed that the route along the Towpath would not comply with the width requirements for a shared path however it is noted that National Design Criteria CD 143 Designing for walking, cycling and horse-riding specifies that a 2.0 metre width is acceptable where there are less than 200 users per hour. Given that the widths specified within the Appellants Transport Statement of Case would be in excess of the minimum design criteria the proposal must incorporate a cycle link between the site and the Towpath.
- 5.5.10 Further evidence that the route should be designed to accompany cyclists is contained at Paragraph 8.2.2 of the Local Transport Note 1/20, Cycle Infrastructure Design dated July 2020, which can be found at Paragraph 4.13.3 of this Statement. This specifies that Towpaths with insufficient widths should not be excluded from a network, as such the route to the Towpath should be designed to accommodate cyclists.
- 5.5.11 It is evident that the route to the towpath is not designed to accommodate cyclists as would be required by the National Planning Policy Framework and also does not meet the required design standards contained with Department for Transport document Inclusive Mobility in relation to gradients for pedestrians. The proposed development is therefore in conflict with Paragraphs 110 to 112 of the National Planning Policy Framework resulting in severe cumulative impacts.
- 5.5.12 The layout would also be in conflict with the clear Policy requirements within Policy CR11 that specify a requirement for a direct landscaped link between the station and the River Thames, a development that should maintain and enhance public access along and to the Thames and improved permeability for pedestrians and cyclists. These are referenced at Paragraphs 4.8, 4.8.1 and 4.8.2 of this report. It is therefore not only to the bridge that a suitable route should be provided but also a route to river itself so as to provide a high quality north-south link through the site.

5.6 Servicing/vehicle movements and pedestrian/cycle safety

- 5.6.1 The Highway Authority agree with the appellant that the proposal provides for a traffic free route through the site as categorised by the Councils Cycle Map and is content that vehicles can cross the shared footway / cycleway in a forward gear or a controlled manner i.e. by way of a banksman.

- 5.6.2 As such the Highway Authority are content that the access associated with The Goods Warehouse is acceptable given that vehicles entering and exiting the parking area would be doing so in forward gear, therefore significantly reducing any risk to pedestrians / cyclists.
- 5.6.3 However, access to The Turbine Hall car park also forms part of the internal turning head for refuse and service vehicles with the appellant providing tracking diagrams to show that vehicles can turn within the turning facility proposed. It should be stressed that the tracking drawings 47500/5500/011A provided by the appellant at Appendix G of the Transport Statement of Case now includes the tracking for a 12m HGV, which was not provided at the time of the application. These tracking diagrams can be found at Appendix 1 of this report.
- 5.6.4 Again it should be stressed that the Highway Authorities concerns relate to the HGV movements associated with the development and in particular the vehicle movements required to facilitate the servicing of the application site and not just the operation of on-site turning that has been presented by the appellant.
- 5.6.5 The appellant has provided an assessment identifying the frequency that HGV's would be required to serve the site, which is contained within Stantec Technical Note TN005, RBC Highway 2nd Response dated 9th September 2020. This can be found at document 6.73 of the Appellant's submission. The assessment undertaken established that the development would generate 0.6 HGVs per day. Extrapolated this equates to 4 HGV trips per week. This assessment does include the provision for refuse collections and the appellant has stressed as part of Technical Note TN005 that refuse collections will be weekly therefore resulting in other HGV movements equating to 3 trips per week.
- 5.6.6 Following a review of the accommodation split across the site it is noted that there is a rough 50/50 between Blocks A to C to the southern end of the site and Blocks D to G at the northern end. It is therefore likely that between 1 and 2 non refuse collection servicing operations by a HGV would take place at the northern end of the site.
- 5.6.7 It is accepted that delivery vehicles will service the development from different locations within the site depending on the residential block they are serving, however for the northern section of site and The Goods Office it is highly likely they will be served from within the turning head itself with the rear of the vehicle facing the north / south footway / cycle link.
- 5.6.8 During the course of the application the appellant has failed to demonstrate how these operations would take place with tracking assessments only undertaken to establish a vehicle undertaking a turning manoeuvre. It is the view of the Highway Authority that in order to better serve the development vehicles would undertake the reverse operation to that tracked by the appellant, which would result in vehicles reversing over the footway / cycleway.
- 5.6.9 The appellant has identified other sites within the Borough in order to argue that reversing movements over the footway/cycleway would not be detrimental to Highway safety but the Highway Authority do not agree that these are comparable sites.

- 5.6.10 Kennet Island is designed in accordance with MfS and provides a grid layout that significantly reduces the need to undertake reversing movements and also there are no crossing facilities where pedestrians are given priority over vehicles. Lynmouth Road and De Montfort Road run parallel to the application site and are provided with no dedicated turning head therefore resulting in vehicles reversing along their length either to enter or exit via Vastern Road. Neither of these sites would therefore result in HGV movements that would reverse over a footway / cycleway given the width of the carriageway and the surrounding on street parking that would make this unachievable.
- 5.6.11 Norman Place which currently facilitates the dedicated route between the towpath and Vastern Road is provided with a turning head at its northern point which at no point crosses the footway and is facilitated fully within the carriageway. The footway / cycleway is provided off carriageway and although pedestrians / cyclists would be required to cross the carriageway at the point at which a service vehicle would undertake a turning manoeuvre, vehicles clearly have the right of way. Pedestrians and cyclists would be required to wait for an appropriate time to cross and this is fundamentally different to the application scheme given that pedestrians and cyclists would be given priority and therefore would be expectant of a vehicle to stop for them.
- 5.6.12 The footway / cycleway through the site has been designed to ensure that pedestrians and cyclists have priority over vehicles and this is essential given the strategic nature of the route and complies with the requirement of the National Planning Policy Framework in relation to giving priority to pedestrians and cyclists. However, the layout will result in HGVs reversing over the footway / cycleway at a point at which drivers will have extremely limited visibility of pedestrians / cyclists leading to conflict between HGV's and pedestrians / cyclists.
- 5.6.13 As specified at Paragraph 112 of the National Planning Policy Framework developments should create places that are safe, minimise the scope for conflicts between pedestrians, cyclists and vehicles and allow for the efficient delivery of goods, and access by service and emergency vehicles. The full context of the National Planning Policy Framework can be found at Paragraph 4.11.3 of this Statement.
- 5.6.14 Any HGV movements reversing over the footway / cycleway would be detrimental to the safety of pedestrians and cyclists and would be contrary to Local Plan Policy TR3 and Paragraphs 111 and 112 of the NPPF.

6.0 Conclusion

- 6.1 The Highway Authority are of the opinion that the proposed footway / cycleway route through the site does not fully accord with Local and National Policy and the National design standards for shared footway / cycleways given that it is neither direct nor safe for users. In this regard the Highway Authority have 3 areas of concern and these are summarised below.
- 6.1.1 The development does not provide for a direct route through the site which is a requirement of not only Local Policy but National design standards to ensure that pedestrian and cyclist movement is given priority through the site. The National Planning Policy Framework specifically states that development should adhere to design standards and it is evident by the provision of the switchback arrangement that the development does not comply in this regard. The design of the switchback is a fundamental noncompliance with National design standards, the effects of which are rendered more severe by the lack of a direct route through the remainder of the site.
- 6.1.2 The proposed route between the development site and the Towpath to the north has not been designed to meet the requirement for cyclists and the gradients would also not adhere to those specified within National Design standards contained within Department for Transport document Inclusive Mobility for pedestrians. The design is therefore not in compliance with Paragraphs 110, 111 and 112 of the National Planning Policy Framework and as the noncompliance of the design standards is deemed severe.
- 6.1.3 The layout would result in HGV movements associated with the development reversing over the footway / cycleway at a point at which drivers will have extremely limited visibility of pedestrians / cyclists. This will lead to conflict between HGVs and pedestrians / cyclists. As such, it would be detrimental to Highway safety and contrary to Local Plan Policy TR3 and Paragraphs 111 and 112 of the National Planning Policy Framework.
- 6.2 Although the proposal may meet other design criteria and may be an improvement over the existing facility via Norman Place, the fundamental noncompliant aspects of the design as identified above far outweigh these benefits. Given that the proposal does not adhere to numerous fundamental design requirements in relation to the north south link through the site, the Highway Authority contend that the appeal should be dismissed.

