

**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

Proof of Evidence Summary on Highway/Transport Matters

**Darren Cook of Reading Borough Council
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1.0 Scope of Evidence

- 1.1 This Proof of Evidence will deal with the transport and Highway matters related 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).

- 1.2 The Highway Authorities Case is broken down into three main areas of concern regarding the north south link and these have been broken down into individual sections as indicated below:

- Proposed North-South link directness and appropriateness and Switchback ramp alignment rationale
- Southern towpath access
- Servicing/vehicle movements and pedestrian/cycle safety

2.0 Proposed North-South link directness and appropriateness and Switchback ramp alignment rationale

- 2.1 The proposed north-south link through the site is insufficient in terms of its directness creating a weak link between Vastern Road to the South of the application site and the River Thames / Christchurch Bridge to the north.

- 2.2 Both Local Policy contained within the Reading Borough Local Plan and Reading Station Area Framework and National Cycle Design Standards contained within Local Transport Note 1/20, Cycle Infrastructure Design dated July 2020 stipulate the requirement for a direct link through the site. The proposed cranked route at the centre of the site and the switchback ramps provided at the northern boundary contradict with these clear and fundamental requirements.

- 2.3 The design of a straight / direct route through the site would not result in increased cycle speeds along the route culminating in conflicting movements between pedestrians and cyclists as stipulated by the Appellant. This is confirmed by Local Transport Note 1/20, Cycle Infrastructure Design dated July 2020.

- 2.4 The development can accommodate a direct route through the site without extending further south towards Vastern Road and can be accommodated within the northern extent of the site.

- 2.5 The footway / cycleway through the site should be given the highest regard in its design given that the Local Plan states that 'achieving this north-south link is the main priority for the site' but this has not been included within the proposed design.

- 2.6 The Highway Authorities case in relation to this matter is further detailed within Paragraphs 5.3 to 5.3.9 (pages 16 to 17) of the Highway Authorities Statement of Case and Paragraphs 4.3 to 4.3.25 (pages 6 to 10) of the Highway Authorities Proof of Evidence.

3.0 Southern towpath access

- 3.1 The proposed route between the application site and the Towpath is not designed to accommodate cyclists as is required by the National Planning Policy Framework. This would include providing suitable routes that connect with proposals contained within the Councils Local Cycling and Walking Improvement Plan (LCWIP). Reading Borough's LCWIP identifies proposals for the Towpath as being dedicated as a cycle route in the future and therefore it is imperative that this link is suitable for cyclists.
- 3.2 There is no design criteria that would restrict the Towpath from being designated for cycling.
- 3.3 The Appellant has provided evidence that confirms that a cycle connection to the Towpath can be provided but has failed to develop a scheme that can accommodate this facility.
- 3.4 The layout would be in conflict with the clear Policy requirements within the Reading Borough Local Plan that specifies 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. It is therefore not only to Christchurch Bridge that a suitable route should be provided but also a route to the river itself so as to provide a high quality north-south link through the site.
- 3.5 The proposed link to the Towpath will provide a desirable and necessary link between the Towpath and Reading Station and beyond, which will be a significant improvement on the existing convoluted or heavily parked routes.
- 3.6 The link to the Towpath is non-compliant in relation to the gradient for pedestrians, with the design not meeting the required design standards contained with Department for Transport document Inclusive Mobility creating unacceptable harm to pedestrians with mobility difficulties.
- 3.7 The Highway Authorities case in relation to this matter is further detailed within Paragraphs 5.5 to 5.5.12 (pages 18 to 20) of the Highway Authorities Statement of Case and Paragraphs 4.4 to 4.4.32 (pages 10 to 18) of the Highway Authorities Proof of Evidence.

4.0 Servicing/vehicle movements and pedestrian/cycle safety

- 4.1 The layout within the Appeal Scheme will result in weekly HGV reversing movements over the footway / cycleway running through the site.
- 4.2 The turning movements of a HGV are not contained within the carriageway as is specified by DfT document Manual for Streets culminating in conflict with pedestrians and cyclists utilising the footway / cycleway.
- 4.3 The Highway Authority does not believe the servicing arrangement proposed by the Appellant as part of the Appellants Transport Statement of Case is practical. The Highway Authority believe that servicing of the site is far more likely to occur from within the turning head itself culminating in the reversing movements over the footway / cycleway.

- 4.4 Vehicles reversing over the footway / cycleway would be doing so utilising their wing mirrors alone drastically reducing the visibility available to them. Clear blind spots would be created leading to drivers not knowing whether the route was clear of pedestrians and cyclists. This creates a clear and significant detriment to Highway Safety.
- 4.5 The Appeal Scheme conflicts with the National Planning Policy Framework which requires developments to 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.
- 4.6 The Highway Authorities case in relation to this matter is further detailed within Paragraphs 5.6 to 5.6.14 (pages 20 to 22) of the Highway Authorities Statement of Case and Paragraphs 4.5 to 4.5.24 (pages 18 to 23) of the Highway Authorities Proof of Evidence.
- 5.0 Conclusion
- 5.1 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.
- 5.2 The development does not provide for a direct route through the site eroding from the strategic link between the Town Centre and the River as required by Policy.
- 5.3 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.
- 5.4 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. Ultimately this will lead to conflict between HGVs and pedestrians / cyclists.
- 5.5 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.