



55 Vastern Road, Reading Planning Appeal

Rebuttal Proof of Scott Witchalls

On behalf of **Berkeley Homes Ltd (Oxford and Chiltern)**

Project Ref: 47500 | Rev: | Date: October 2021

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Description: Rebuttal Proof of Scott Witchalls for Appeal Against Reading Borough Council's Refusal of Planning Application (LPA ref. no. 200188) by Berkeley Home (Oxford and Chiltern) for the redeveloped for the former SSE site at 53-55 Vastern Road to accommodate 209 new homes

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Appendix A Photographs of Southern Towpath

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1 Introduction

1.1.1 This rebuttal evidence has been prepared on behalf of Berkeley Homes Ltd (Oxford and Chiltern) to provide a response to the issues raised by Reading Borough Council (RBC) regarding transport and highways matters that form part of the public inquiry for the 55 Vastern Road development of 209 homes.

1.1.2 **Section 2** of this rebuttal deals with the matters raised in the Proof of Evidence (PoE) of Darren Cook prepared on behalf of RBC with regards to transport and highway matters, that have not already been addressed in the Proofs of Evidence of Scott Witchalls and Dave Taylor, as well as Rebuttal Evidence of Dave Taylor follows:

- Southern Towpath Access (Section 2.1)
- Vehicle Loading, servicing and risk of reversing vehicles on the pedestrian/cycle link (Section 2.2)

2 Matters Raised by RBC Highways

2.1 Southern Towpath Access

- 2.1.1 Mr Cook states (para 4.4.17) that *“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 the Highway Authorities Statement of Case. 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.”*
- 2.1.2 It remains the case that the RBC aspiration to enable potential future use of the towpath by cyclists is still an unfunded scheme of many (Scheme 41 of 77), which are outlined in Mr Cook’s Appendix 3, ‘Request for Traffic Management Measures 2’ and has ‘high’ anticipated costs. There is also a legal process to be gone through that will be subject to potential objection from landowners and the wider public, even if RBC is able to source the necessary ‘high’ cost funding. There is therefore still no certainty that this scheme will or is even possible to implement.
- 2.1.3 In addition to this, the above section of LTN 1/20 to which Mr Cook refers actually states in para 4.3.13 that *‘canal towpaths should not be excluded from a network solely due to width or headroom restrictions, unless there are serious safety concerns.’* (my underlining).
- 2.1.4 Mr Cook therefore acknowledges that the towpath has insufficient width but doesn’t take into account the combined effect of this insufficient width at the point where a complex junction with conflicting movements would arise (ie the towpath, a ramp down from the site towards the river and the bottom of the steps from Christchurch Bridge). The three combined would create a safety concern of the type highlighted in LTN 1/20.
- 2.1.5 Para 5.11.1 of LTN 1/20 notes that *‘Gradients present a potential hazard where cyclists could lose control. Designers should carefully consider the combination of horizontal and vertical geometry where gradients are greater than 3%. Unguarded hazards (e.g. fixed objects, steep drops or water hazards) should not be permitted within 4.5m of the route where they would lie in the path of an out-of-control cycle. An example location where a hazard should be guarded is adjacent to the vertical drop to the water at the bottom of an access ramp that approaches a river bank or canal towpath.’*
- 2.1.6 In this case, the gradient down to the river would be c.5% and the river would be c4-4.5m from the bottom of the ramp. I have included additional photographs of this section of the towpath in Appendix A. These demonstrate the existing conflicts and constraints at this location as well as the additional constraining effect of the physical barriers, such as at the bottom of the existing steps to the bridge. Such physical barriers have the effect of further reducing the width of the route by 0.5m for each barrier as set out in LTN 1/20 para 5.5.4 and Table 5-3. This means that the existing effective width is reduced to c.1m in this area (photos A.1 and A.2). The images of Norman Place (photos A.4 and A.5) show the similar effect for the existing cycle route from the bridge to the station.
- 2.1.7 Mr Cook also states in para 4.4.18 that *“The Appellant has also claimed at 6.6.13 of their Transport Statement of Case that in their view, it would be inappropriate to provide a new cycle route ramp down to a substandard towpath as this could result in conflicting movements at the point where they meet on a 90 degree bend. However, as is identified by the Appellant there are numerous links along the Towpath that allow for cycle access on a 90 degree bend i.e. Brigham Road, Lynmouth Road, De Montfort Road as well as others. The Highway Authority are not aware of any conflicts resulting from these locations.”*

2.1.8 The comparison Mr Cook gives to the existing roads joining the towpaths at 90 degrees do not in any way represent the arrangement of the towpath connection proposed as part of the appeal site layout. The roads listed have wide approaches to the towpath (typically over 6m wide) spanning the full width of the highway and are broadly at the same level as the towpath in a fully open environment without physical barriers making it significantly less likely that a conflict will arise. These are shown in Figures 2.1 to 2.4 below.

Figure 2.1: Photograph of Lynmouth Road / Towpath connection - view from Lynmouth Road



Figure 2.2: Photograph of Lynmouth Road / Towpath connection - view from Towpath



Figure 2.3: Photograph of De Montfort Road/Towpath connection - view from De Montfort Road



Figure 2.4: Photograph of De Montfort Road/Towpath connection - view from Towpath



- 2.1.9 Overall, in response to the above issues regarding user conflict, I maintain my view that in providing an additional cycle link down the slope of a ramp onto a narrow towpath with existing constraints and conflicts would be at a detriment to safety and user comfort and would result in a greater potential of conflict between the various user groups travelling at different speeds than the existing more than adequate signposted routes. This is contrary to the LTN1/20 guidelines.

2.2 Vehicle Loading, servicing and risk of reversing vehicles on the pedestrian/cycle link

- 2.2.1 Mr Cook confirmed via email correspondence dated 8th October 2021 that RBC's objections relating to the above matters have now been withdrawn.

3 Conclusion

- 3.1.1 The only transport matters that are now in dispute are the alignment of the pedestrian/cycle link to Christchurch Bridge and the need or otherwise to provide a cycle link to the towpath.
- 3.1.2 I have set out in my Proof of Evidence, supported by that of Dave Taylor, why a 'straight' cycle link cannot be provided to Christchurch Bridge and that the proposed design fully meets policy requirements and design standards.
- 3.1.3 I have set out in my Proof of Evidence, and in this Rebuttal, that a cycle link to the towpath is not required, would be less safe than existing routes, and could not be designed to comply with LTN 1/20 guidelines.
- 3.1.4 For the above reasons, I remain of the view that the design as proposed provides a highly accessible development in compliance with policy that will deliver a significantly improved route, which is safe and attractive to all users and that the development has been demonstrated to have no detrimental impact on the local highway network or safety.
- 3.1.5 I do not believe that Reason for Refusal 1 and the other matters raised in relation to transport matters, is justified.

Appendix A Photographs of Southern Towpath

Photograph A.1: View looking east along towpath toward Christchurch Bridge



Photograph A.2: View looking west along towpath (towards Caversham Bridge)



Photograph A.3: View looking towards the site boundary wall and west along towpath from bottom of Christchurch Bridge steps



Photo A.4) View looking north towards the River and towpath from existing Norman Place link



Photo A.5) View of existing shared foot/cycle link looking south towards Norman Place turning head

