Memo

From: (e)Transport Development Control Floor 1 North Rear Civic Offices Bridge Street Reading RG1 2LU

To: Brian Conlon brian.conlon@reading.gov.uk

Date: 13 July 2020

Re: Consultation on Planning Application

Application Number: 200328
Application Type: Outline Planning Approval
Address: Vastern Court Caversham Road Reading
Proposal: Outline planning permission for Demolition and redevelopment to comprise: up to 115,000 sqm GEA in one or more land uses comprising: Residential (Class C3 and including PRS); Offices (Use Class B1(a); development in Use Classes A1, A2, A3 (retail), A4 (public house), A5 (take away), C1 (hotel), D1 and D2 (community and leisure); car parking; provision of new plant and renewable energy equipment; creation of servicing areas and provision of associated services, including waste, refuse, cycle storage, and lighting; and for the laying out of the buildings.

Transport Comments

The proposed application consists of a comprehensive redevelopment of the site including Outline planning permission for demolition and redevelopment of up to 115,000 sqm GEA in one or more land uses comprising:

- Residential (Class C3 and including PRS);
- Offices (Use Class B1(a);
- development in Use Classes A1, A2, A3 (retail),
- A4 (public house),
- A5 (take away), C1 (hotel),
- D1 and D2 (community and leisure);
- Car parking;
- Provision of new plant and renewable energy equipment;
- Creation of servicing areas and provision of associated services, including waste, refuse, cycle storage, and lighting; and for the laying out of the buildings.

Given the scale of the development the application has been accompanied by a Transport Assessment and I comment on this as follows:

Site Location / Accessibility

The site is located adjacent the corner of the A329 Caversham Road and the A329 Vastern Road in Reading, Berkshire. It is immediately north of Reading Railway Station. The site currently operates as a retail park comprising The Range, Majestic Wine, Aldi, Mothercare, and TGI Fridays.

The site benefits from being in relatively close proximity to a vast range of important services and facilities, thus creating opportunities for journeys to be made on foot, by bicycle, and by public transport.

The site is situated within walking distance of a vast range of day-to-day services and facilities including supermarkets, schools and health facilities. A number of bus stops served by a number of high frequency services are also located adjacent the site. The site is situated in close proximity to employment opportunities available in Reading town centre, the Kings Meadow employment area and Richfield Trading Estate.

All roads in the vicinity of the site benefit from comprehensive footway provision along both sides of the carriageway facilitating convenient and safe pedestrian movement in the local area. Further pedestrian/cycle infrastructure in the vicinity of the site includes:

- Signalised pedestrian crossings to the south of the Northfield Road junction;
- Signalised pedestrian crossings at the Vastern Road arm of the roundabout adjacent the northwest corner; and
- Signalised crossings at Trooper Potts Way junction.

The Reading 'Cycle Routes in Central Reading' map shows the local cycle route network developed by RBC. A number of these routes pass in close proximity to the site and provide access to various locations around Reading. The foot / cycle way across the Vastern Road frontage of the site will also be upgraded as part of the landscaping proposals for the development.

The development will also provide cycle parking for both the residential and commercial uses, including provision for visitors.

The Station North Bus Interchange is located immediately to the east of the site comprising stops NA, NB, NC and NE. The Caversham Road Fire Station stops are located to the southwest of the site. Shelters and real time passenger information are provided at the Station Interchange Stops whilst the Caversham Road Fire Stations benefit from timetable information. Regular services operate to central Reading, Henley, Marlow, High Wycombe and Oxford.

An increased number of buses can be accessed to the South side of the Station with the central core of the Town Centre.

Reading Railway Station is located immediately to the south of the site. It is a major transport hub and is served by three train operating companies: Great Western Railway, Crosscountry and South Western Railway.

Frequent services operate to London Paddington, Swindon, Bristol Parkway and Bristol Temple Meads, Cardiff, Oxford, Birmingham New Street amongst others.

<u>Access</u>

A gap between buildings C and D has been provided so that a pedestrian / cycle / landscape route can be provided which would form part of the improved north / south link identified within the Councils Local Policies.

The gap between the buildings is 23m and would be sufficient to accommodate a 5m wide pedestrian / cycle route. However, the drawings submitted fail to show how this would tie in with the route to the station underpass which is currently subject to another current planning application. Revised plans are therefore required fully detailing how these two

sites would interact to ensure that this does not impact on the proposed building plot locations.

In addition to this the proposal must ensure that the building plots do not conflict with the requirement to provide a signalized crossing on Vastern Road which would link to the SSE site (also a current application) and Christchurch Bridge to the north. It was explicitly stated at the pre-application stage that the applicant work with the developer of the SSE site to ensure that the scheme does not detrimentally impact the delivery of a crossing facility.

The applicant must therefore engage with the developers of the SSE site to establish the location of the crossing to ensure the building plots tie in with this desire line.

The proposal has been submitted with the design of the access to be assessed at reserved matters stage. However, I do have concerns regarding the indicative vehicle exit illustrated on a landscape plan included within the Transport Assessment. The area specified on drawing 17043 PP-101 Rev P1 is also the location where the Vastern Road carriageway changes from a two lane carriageway to three which currently commences as an exit lane from the retail park.

It is noted that the commencement of the current exit is located at the far eastern extremity of the area designated as the proposed access zone if not beyond, which would conflict with approximately two thirds of Plot C. I would therefore assume that if this were to be where the access is ultimately located this would significantly reduce the developable area of the site.

The proposal will also now include the provision of larger service and refuse vehicles exiting from this point which would have previously exited from Trooper Potts Way. The access design would therefore need to take account of the fact that vehicles should not extend out further than the inside lane. This is therefore likely to require the retention of an exit lane in some form similar to that currently provided.

May I also make reference to the comments made at pre-application stage regarding a proposed site access arrangement. I had concern over the access reducing the distance to the Caversham Road / Vastern Road roundabout which does experience queuing back to the existing site access and also reduces the availability for vehicles heading east given that there is less carriageway length to get into the right hand lane after exiting the site. It was stressed that these points would need to be addressed as part of any safety audit and assessment of the junction at an application stage. Although the access design is not to be considered at the application stage the impact of the development on the surrounding Highway network is and therefore the applicant must assess the impact on the Caversham Road / Vastern Road roundabout following the reduction in length of the left hand lane approaching the roundabout.

Drawings would also be required clarifying that the location of any proposed exit would not detrimentally impact the delivery of a crossing facility on Vastern Road.

In relation to the access point on Caversham Road it has been discussed with the applicants of this proposal and that of the Royal Mail site located adjacent to the south that a shared access could be provided. Drawing PP-101 shoud, therefore extend the access zone further south to take account that the access could be taken form the adjacent site.

It is also noted that drawing 17043PP-100 Rev P1 illustrates a 5m wide strip around the northern boundary of the site to facilitate a 3m wide cycle lane and landscaping. However, given that access is to be determined at the reserved matters stage the Highway Authority are unable to determine whether 5m would be enough to facilitate this.

However, it should be noted that the current Highway boundary extends far greater than the 5m specified with the northern boundary to Plot C obtaining widths of 10m plus. As a result, revised drawings must be provided identifying the location of the Highway boundary to ensure that the building plots are not located on the Public Highway, which from my assessment some parts of the development are.

In addition, I am concerned as to whether there would be sufficient space to facilitate a 3m wide cycle lane alongside the landscaping which will include the requirement of large canopy tree planting.

The above must therefore be addressed.

Trip Generation / Traffic Impact

The applicant undertook traffic surveys of the retail park on 30/04/19, where the vehicle flow entering and exiting the site were recorded. The results are summarised within the Table below, which has been taken from the TA. As can be seen, the retail park generates a significant number of vehicle trips both during peak hours and daily, the latter representing over 3,300 two-way movements. The survey results form the baseline traffic survey data, against which the impact of the proposed development is assessed.

Table 6.1: Surveyed Vehicle Trip Generation (Weekday Interviews)

Mode	AM Peak 0800-0900		PM Peak 1700-1800		Daily 0700-2330	
	Arrivals	Departures	Arrivals	Departures	Arrivals	Departures
Vehicles	53	37	112	136	1,676	1,678

Having reviewed the survey data I am happy that this represents a true reflection of the existing use of the site.

The applicant has stated that the proposed trip generation has been based on a 'worst case' scenario where the 115,000sqm maximum floorspace has been assumed to comprise 113,000sqm B1 and 2,000sqm retail.

However in response to the above the application includes a multitude of different land uses all of which could be applied up to the maximum land use of 115,000m2. The Development Parameters Schedule states the following:

The floorspace within Use Class C3 shall not exceed 100,000 sqm GEA. The total maximum number of residential units shall not exceed 1,000.

The mix of residential accommodation may range from studio apartments up to 3 bed apartments.

The floorspace within Use Class A1-A5 and D1-D2 shall not exceed 7,000 sqm GEA and shall not be less than 2,000 sqm.

The floorspace within Use Class C1 shall not exceed 8,000 sqm.

The floorspace within Use Class B1(a) shall not exceed 113,000 sqm GEA.

However, no assessment has been provided that demonstrates that the assessment undertaken is a worst case scenario, a further assessment/comparison is therefore required to establish what the worst case would be.

I note that the applicants have stated that the approach taken was agreed as part of the TA scoping Note however, this is not the case. I refer to paragraph 8.1 of the TA scoping Note which states:

CEC proposes to derive trip rates for the various uses proposed from the TRICS database and from 2011 census data. Person Trip Rates will be derived from TRICS with these being applied to the Method of Travel to Work census data. With respect to vehicular trips, given the high trip generation of the existing retail park and the fact that the proposed development will only have limited Blue Badge car parking, the TA is expected to show a significant reduction in vehicle trips. A census-based (travel-to-work) distribution will be undertaken for bus trips.

At no point does this state that office trip rates will be used as a worst case and as such this was not agreed.

I have however reviewed the trip rates provided and I comment on these as follows:

Office Trip Rates
The office trips rates have been obtained from the Trip Rate Information Computer System (TRICS) which is the national standard system of trip generation and analysis in the UK and Ireland, and is used as an integral and essential part of the Transport Assessment process. It is a database system, which allows its users to establish potential levels of trip generation for a wide range of development and location scenarios, and is widely used as part of the planning application process by both developer consultants and local authorities and is accepted by Inspectors as a valid way to ascertain likely trip generation. The Highway Authority therefore happy with this methodology.

The sites selected comprise all the sites located within 'edge of town centre', 'suburban area' and 'edge of town' locations. With the applicant stating that it is important to note that TRICS have advised that sites should be selected based on characteristics and not excluded simply due to location. However, I do not agree with the locations utilized as they do not represent the characteristics of the application site in question. I would argue that the application site is a town centre location, this point is confirmed by the applicant including sites within areas such as Greater London.

I have therefore reviewed TRICS myself and compiled an acceptable TRICS output and I append that to these comments.

The applicant has utilized travel to work census data to establish the modal split however, this would only be sufficient on residential uses and not for commercial purposes as the data reflects how people travel from the area to their place of work and not visa versa. The modal split would therefore need to be established from the modal splits located within the TRICS data I have presented.

Retail Trip Rates
The trip generation associated with the proposed retail space has been based on multimodal data obtained from the TRICS database to which I have no objection in principle. The applicant has utilized the 'Food Superstore' sub category as the basis of the assessment as it was considered the highest trip generating land use of the potential use classes. However, no TRICS data has been provided alongside this application to confirm the overall trip generation and the actual trip rates have not been specified. This must be provided.

The applicant has included sites within locations identified as edge of town centre, suburban area and edge of town locations however as per the office trip rate assessment I have concern over the potential locations given that would not be comparable to what is essentially a town centre site.

As a consequence of this the applicant has stated that none of the sites available on the TRICS database are comparable to the site in terms of car parking provision and therefore the number of vehicular trips are significantly higher than is expected. The applicant has therefore redistributed the vehicular trips on to the other main modes (bus, bicycle and on foot) proportionally.

However, on reviewing the TRICS database it is noted that the worst case assessment would actually be local shops and therefore an assessment is required to confirm what is the worst case scenario.

It is noted that the proposed retail use is to be between a range of 2,000m^2 and 7,000m^2 which is significantly different to what was presented at the pre-application stage which was a maximum of 3,269m^2. It is also noted that the existing retail park has a total floor area of 6,969m^2 therefore the maximum floor area presented in the application is greater than that currently on site and is the equivalent to a retail park. It should therefore be clarified what type of retail offer is to be provided and parameters included to ensure this is adhered to. This will also help with the parking requirement, to which I comment specifically on later within this response.

As a result of the above I am unable to agree that the trip rate assessment is acceptable neither the impact to public transport as a result.

<u>Parking</u>

Car Parking
The proposed development is considered car-free, except for the provision of disabled car Parking. It has been stated that this would be in accordance with the standards contained within the Reading Revised parking Standards and Design document however the Councils standards require a provision of disabled parking as a percentage of standard spaces. The applicant has stated that they are not proposing standard spaces and therefore the level of disabled spaces is proposed at the applicant's discretion.

This is detailed as being one disabled parking space per 5% of the residential units provided. However, the actual number of residential units have not been provided. It also continues to state that the final number of car parking spaces is to be ascertained as the detailed elements of the development are finalised.

The application however includes the parking to be assessed as part of this outline application therefore it must be reviewed and the car parking numbers confirmed, given

that the parking will not be in accordance with the Councils standards this must therefore be fully addressed as part of updated information.

As stated above the proposed retail use is to be between a range of 2,000m2 and 7,000m2 which is significantly different to what was presented at the pre-application stage which was a maximum of 3,269m. This is greater than that currently on site and is the equivalent to a retail park.

During the pre-application discussions the Highway Authority had no objections to smaller scale units having zero parking as it would be assumed that they would be ancillary shops, coffee shops, etc which are unlikely to result in dedicated trips in their own right. However, a retail offer of 7,000m2 will result in dedicated trips and subsequently the requirement for car parking. Should the proposal retain the maximum of 7,000m2 then a car accumulation assessment should be undertaken based on the survey results presented in the Transport Assessment to establish what parking should be provided.

Although the surrounding area is restricted through parking permits these do allow 2 hour parking between the hours of 8am and 8pm and therefore the Highway Authority cannot support a development that will result in an increased demand for on street parking. It is evident from the applicant's own trip rate analysis that the retail use will generate vehicle trips, based on this assessment a floor area of 7,000m2 would equate to 4,970 vehicle movements a day.

Given the above the Highway Authority would not be able to support a retail offer with no parking based on the parameters that have been included.

Although not detailed with the main text of the Transport Assessment it has been stated that the proposal will provide electric charging facilities in line with the Reading Revised parking Standards and Design document. However, it would need to be confirmed that the electric charging would be in accordance with the requirements of the Local Plan adopted in November 2019 as this stipulates the latest requirement for electric charging facilities in Reading. The Policy stipulates the following:

TR5: CAR AND CYCLE PARKING AND ELECTRIC VEHICLE CHARGING

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.

Development should make the following provision for electric vehicle charging points:

- *All new houses with dedicated off-street parking should provide charging points;*
- *Within communal car parks for residential or non-residential developments of at least 10 spaces, 10% of spaces should provide an active charging point.*

Please note I am happy for the layout of the car parking to be dealt with at the reserved matters stage once the design and layout evolves.

The applicant has stated that Car Club parking bays will be provided at street level within the site. I am happy that this can be secured through the S106 and include the requirement that 2 car club spaces are provided that are funded for a period of 5 years.

I am happy that the car club scheme will be developed during the course of the reserved matters application.

Cycle Parking
The development will provide cycle parking for all of the various uses in accordance with the minimum standards set out in the Reading Revised parking Standards and Design document. It is also stated that the cycle parking will be provided through a mix of Double Stackers, Sheffield Stands and Oversized Cycle Stands.

Given that it has been confirmed that the cycle parking will be in accordance with the Councils minimum requirements this is deemed acceptable. I am also happy that the layout of the cycle parking be developed at the reserved matters stage.

Servicing
The applicant has stated that the proposals will incorporate facilities to enable a comprehensive servicing strategy. This is stated as including all servicing to be undertaken on site through dedicated loading bays and servicing yards. It concludes that a Delivery and Servicing Management Plan (DSMP) with appropriate swept path analysis will be provided as part of the detailed application.

However, the outline application seeks to agree servicing and therefore this would need to be fully assessed now and not at the reserved matters stage. As such the Delivery and Servicing Management Plan (DSMP) with appropriate tracking must be submitted alongside this application for determination.

I would however comment on the servicing strategy that has been submitted to date:

- The proposal includes servicing routes that go under the buildings themselves as a shared access to the undercroft parking courts. It should be noted that to facilitate access to these undercroft areas a minimum head height of 5m would be required.
- Dedicated loading bays should be provided to ensure that vehicle access routes are not obstructed.
- Plot C would require on site turning so that service vehicles are not reversing out on to the north south vehicular exit route.
- It is noted that Plot D is to be served from Trooper Potts Way and requires the provision of a new loading bay which would result in the removal of the existing footway on the Public Highway, which is contrary to the Transport Statement which states that all servicing would be from within the site. In addition, no plans have been provided that identify a relocated footway between Plot D and the loading bay, this would need to be provided and included as a footway to be adopted. Revised plans must therefore be submitted clearly defining the re-provided footway and confirm the extent of a 2m wide footway for adoption.
- It would also need to be ascertained how access to the loading bay would be gained given that no through route is proposed and no turning facility is provided on Trooper Potts Way itself. The adopted Highway only extends 51m approx. along Trooper Potts Way and therefore access over third party land would need to be sought. It is noted that the DAS identifies Bagnell Way as a bus only route except for station access.
- It is proposed to serve Plot A via an access located in the north east corner of the building which will result in vehicles having to reverse along the pedestrianized route leading to the existing signalized crossing on Vastern Road. This would be detrimental to Highway safety and cannot be supported. The proposal must therefore provide separate vehicle and pedestrianized areas not only adjacent to

the loading area but along this north south route. This may be a secondary route but it will still play an important role in providing pedestrian and cycle access to the north.

- I note the fire strategy identified at 6.11 of the DAS which identifies the extension of the central street to the east so that it runs along the southern boundary of Plot C and connects to a temporary access onto Trooper Potts Way. However, this should be clarified in more detail. In addition to this point I note paragraph 3.4 of the Design Code and in particular Figure 14, included below. These identify the provision of a controlled two-way service route along the southern boundary of Block C, this again would need more clarification and detail as to how this would be controlled, who would have access and how vehicles would turn so that vehicles are not reversing along a pedestrianized route.

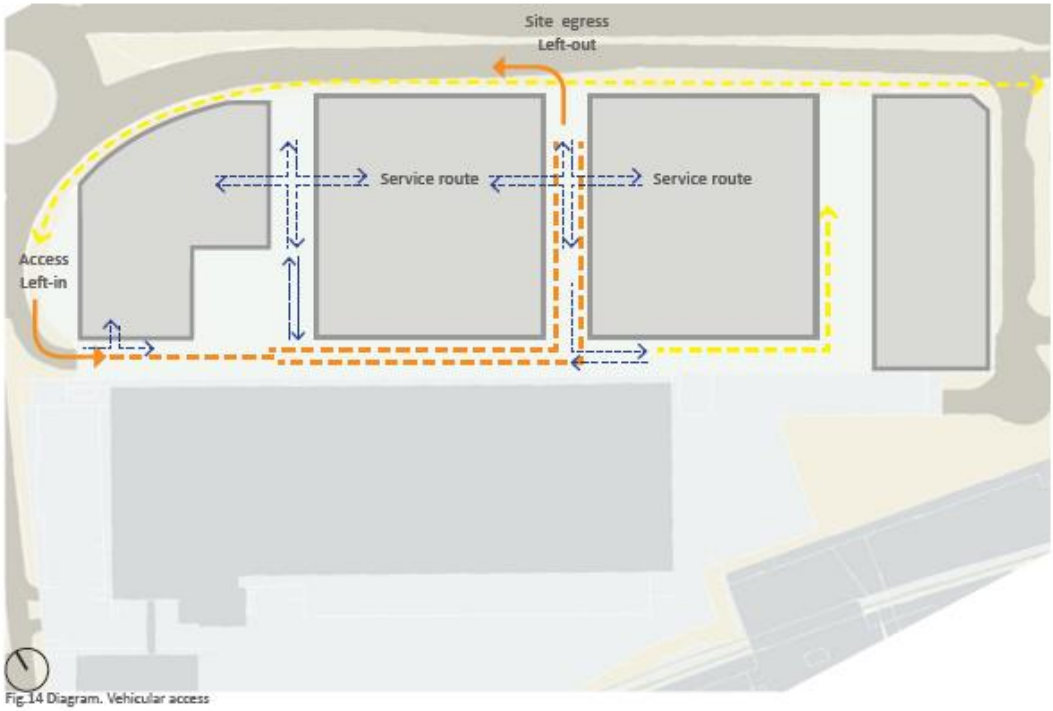
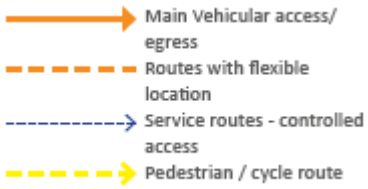


Fig.14 Diagram. Vehicular access



The servicing strategy should therefore be revised to reflect the above.

Please ask the applicants agent to submit suitably amended plans / information to address the above points prior to determining the application.

Darren Cook
Transport Development Control Manager