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7<sup>th</sup> January 2020

Your contact is: Mr Jonathan Markwell, Planning

Dear Sir / Madam,

**FURTHER CONSULTATION RESPONSE on application no: 191655**

Application type: Adjacent Authority Consultation

Address: Crosfields School, Shinfield Road, Reading, RG2 9BL

Proposal: Full planning application for the proposed erection of a new senior school building, re-configuring of two entrances and demolition of existing white building.

Applicant: Crosfields School

I refer to the consultation of the above application which was received on 2 August 2019. Further to the consultation response sent by RBC on 26 September 2019, I write to advise that further comments have been received from the RBC Transport Development Control Manager. I can confirm that the Local Planning Authority now formally **objects** to the proposal.

Accordingly, and in advance of the item being scheduled to be discussed at Wokingham's Planning Committee on Wednesday 8 January, it is requested that the following points should be taken into account:

The proposed development seeks to secure consent for a number of additional features across the site, which are proposed to be delivered in two phases. These phases comprise the following:

Phase 1

- New senior block building
- Improved north entrance, re-ordering of parking including facility to accommodate coach/minibus daily school transport services
- Demolition of "white building" (once new senior block complete)

- Small extension of estates building to accommodate staff)
- Improved south entrance, provision of new staff parking, pupil pick-up and drop-off zones and longer term parking for coaches visiting for sports fixtures.
- phased increase in pupil numbers by up to 300

## Phase 2

- New building to provide teaching space on site of former “white building”

A survey has been undertaken on the current travel patterns for pupils of the school and this has identified that 84% of pupils travel to the school by car. Once the maximum capacity of the school is reached this would equate to an additional 252 vehicles on the Highway Network in an area that is already busy as is highlighted within the Transport Assessment. However, it is noted that no assessment has been undertaken of any surrounding junctions; the only junctions assessed are the school accesses which are to be revised as part of the proposed development. Having reviewed the application, it is noted that there is currently an approximate 50/50 distribution split of children attending the school from the south and the north (i.e. Reading), the breakdown of the trips to and from Reading before and after development can be found below:

### Existing School Vehicle Trips Before Development

AM 329 to and from Reading

PM 150 to and from Reading

### Existing and Proposed Vehicle Trips After Development

AM 502 to and from Reading

PM 224 to and from Reading

As such, the proposed development will result in an increase of 173 vehicle movements in the AM peak and 74 vehicle movements in the PM Peak periods, travelling either to or from Reading. This is a 20% increase to the existing traffic flows in the AM Peak, which is more than a significant increase. As stated in the Transport Assessment at Paragraph 3.1 the ‘A327 Shinfield Road is a busy principal route leading south from Reading towards Farnborough’; given that the road network is busy with congestion occurring at the A327 Shinfield Road and Whitley Wood Road signalised junction, and the proposed 20% increase in traffic, Reading Borough Council objects to the proposal on the grounds that this junction has not been assessed. It is noted within the Transport Assessment that no surrounding junctions have been assessed, but this approach is contrary to the National Planning Practice Guidance which states the following at Paragraph: 014 Reference ID: 42-014-20140306 dated 06 03 2014:

*The need for, scale, scope and level of detail required of a Transport Assessment or Statement should be established as early in the development management process as possible as this may therefore positively influence the overall nature or the detailed design of the development.*

*Key issues to consider at the start of preparing a Transport Assessment or Statement may include:*

- the planning context of the development proposal;
- appropriate study parameters (ie area, scope and duration of study);
- assessment of public transport capacity, walking/cycling capacity and road network capacity;

- road trip generation and trip distribution methodologies and/ or assumptions about the development proposal;
- measures to promote sustainable travel;
- safety implications of development; and
- mitigation measures (where applicable) - including scope and implementation strategy.

*It is important to give appropriate consideration to the cumulative impacts arising from other committed development (ie development that is consented or allocated where there is a reasonable degree of certainty will proceed within the next 3 years). At the decision-taking stage this may require the developer to carry out an assessment of the impact of those adopted Local Plan allocations which have the potential to impact on the same sections of transport network as well as other relevant local sites benefitting from as yet unimplemented planning approval.*

*Transport Assessments or Statements may identify the need for associated studies or may feed into other studies. However care should be taken to establish the full range of studies that will be required of development at the earliest opportunity as it is unlikely that a Transport Assessment or Statement in itself could fulfil the specific role required of a transport element of an Environmental Impact Assessment where this is required. Particular attention should be given to this issue where there are environmentally sensitive areas nearby and where the proposal could have implications for breach of statutory thresholds in relation to noise and air quality either as a result of traffic generated by the site or as a consequence of the impact of existing traffic on the site under consideration.*

Which continues to state the following at Paragraph: 015 Reference ID: 42-015-20140306 dated 06 03 2014:

*The scope and level of detail in a Transport Assessment or Statement will vary from site to site but the following should be considered when settling the scope of the proposed assessment:*

- information about the proposed development, site layout, (particularly proposed transport access and layout across all modes of transport)
- information about neighbouring uses, amenity and character, existing functional classification of the nearby road network;
- data about existing public transport provision, including provision/ frequency of services and proposed public transport changes;
- a qualitative and quantitative description of the travel characteristics of the proposed development, including movements across all modes of transport that would result from the development and in the vicinity of the site;
- an assessment of trips from all directly relevant committed development in the area (ie development that there is a reasonable degree of certainty will proceed within the next 3 years);
- data about current traffic flows on links and at junctions (including by different modes of transport and the volume and type of vehicles) within the study area and identification of critical links and junctions on the highways network;
- an analysis of the injury accident records on the public highway in the vicinity of the site access for the most recent 3-year period, or 5-year period if the proposed site has been identified as within a high accident area;
- an assessment of the likely associated environmental impacts of transport related to the development, particularly in relation to proximity to environmentally sensitive areas (such as air quality management areas or noise sensitive areas);
- measures to improve the accessibility of the location (such as provision/enhancement of nearby footpath and cycle path linkages) where these are necessary to make the development acceptable in planning terms;
- a description of parking facilities in the area and the parking strategy of the development;
- ways of encouraging environmental sustainability by reducing the need to travel; and
- measures to mitigate the residual impacts of development (such as improvements to the public transport network, introducing walking and cycling facilities, physical improvements to existing roads.

*In general, assessments should be based on normal traffic flow and usage conditions (eg non-school holiday periods, typical weather conditions) but it may be necessary to consider the implications for any regular peak*

*traffic and usage periods (such as rush hours). Projections should use local traffic forecasts such as TEMPRO drawing where necessary on National Road Traffic Forecasts for traffic data.*

*The timeframe that the assessment covers should be agreed with the local planning authority in consultation with the relevant transport network operators and service providers. However, in circumstances where there will be an impact on a national transport network, this period will be set out in the relevant government policy.*

In addition to the above it is noted that the proposal includes the provision of additional drop off / pick up spaces for children which will further encourage the use of the private car, but conversely, no improvements have been proposed to promote other more sustainable modes of travel. The requirement for drop off / pick up spaces is not included within Wokingham's Parking SPD and no justification has been provided as to why this should be included within the scheme, which is therefore increasing the number vehicle movements on the network. This does not comply with the NPPG paragraphs nor the National Planning Policy Framework which states the following at paragraph 110:

*110. Within this context, applications for development 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.*

This is also covered within the Wokingham Core Strategy which states the following:

#### *CP6 - Managing Travel Demand*

*Planning permission will be granted for schemes that:*

- a) Provide for sustainable forms of transport to allow choice;*
- b) Are located where there are or will be at the time of development choices in the mode of transport available and which minimise the distance people need to travel;*
- c) Improve the existing infrastructure network, including road, rail and public transport, enhance facilities for pedestrians and cyclists, including provision for those with reduced mobility, and other users;*
- d) Provide appropriate vehicular parking, having regard to car ownership;*
- e) Mitigate any adverse effects upon the local and strategic transport network that arise from the development proposed;*
- f) Enhance road safety; and*
- g) Do not cause highway problems or lead to traffic related environmental problems.*

*CP10 - Improvements to the Strategic Transport Network Improvements to the Strategic Transport Network will be provided to ameliorate major environmental or safety problems and to support new development in partnership with other authorities. The improvements to the strategic transport network are:*

- 19 - Improvements to the quality and frequency of public transport services along any part of the network*
- 20 - Improvements to increase the use of bicycles, including cycle paths*
- 21 - Enhancements to footpath and cycle networks to improve access to services and*

There is therefore conflict with National Policy and we would respectfully suggest it does not meet Wokingham's own Core Strategy Policies.

A travel plan has been mentioned in the Transport Assessment, but the details of which are to only reduce the number single car occupancy vehicles which would only relate to staff. There is consequently no requirement through this process to encourage pupils to utilise other modes of travel, which is the main car generator.

Increased traffic congestion along the A237 Shinfield Road will only worsen the reliability to bus routes 3, 3b and 10 which pass the site and further encourage users of this service to use the private car.

It is therefore evident that the transport implications of the proposed application have not been adequately assessed within the Transport Assessment, including the impact on the surrounding Highway Network, which will have detrimental impacts for both Reading and Wokingham boroughs.

Given the proposed increase in vehicles the development must assess the A327 Shinfield Road / Whitley Wood Road signalised junction and provide suitable mitigation to promote alternative modes i.e. improvements to crossing the A327 Shinfield Road to access bus stops, provide footway cycleway along the A327, provide bus priority along the A327 corridor.

Without the above being secured/addressed, Reading Borough Council **objects** to the proposed development on the following grounds:

Insufficient information has been submitted with the planning application to enable the highways, traffic and transportation implications of the proposed development to be fully assessed. From the information submitted, it is considered that the additional traffic likely to be generated by the proposal would adversely affect the safety and flow of users of the existing road network within Reading, contrary to Policies CC6, TR1 and TR3 Reading's Adopted Local Plan and Policies CP6 and CP10 of the Wokingham Core Strategy.

Should you wish to discuss any matter in relation to this objection further, please contact Darren Cook (Transport Development Control Manager - 0118 937 2612 or 07814 169457 - [Darren.cook@reading.gov.uk](mailto:Darren.cook@reading.gov.uk)) in the first instance.

Yours sincerely

*Jonathan Markwell* (via email only)

Jonathan Markwell  
Principal Planning Officer

*JEM*