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29th January 2020

Your contact is: Mr Jonathan Markwell, Planning

Dear Jeanette,

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 your email of 24th January 2020, comprising the submission of additional information by Glanville Group. This seeks to respond to the various matters raised in the most recent consultation response by Reading Borough Council (RBC) on 7th January 2020. On the basis of further comments I have received from the RBC Transport Development Control Manager, I can confirm that the Local Planning Authority continues to formally **object** to the proposal.

The further observations received from Darren Cook, RBC Transport Development Control Manager, are provided in full below:

The proposed development seeks to secure permission 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”

Following previous comments on the application, further transport documentation has been submitted to accompany the planning application to which RBC Transport Development Control comment as follows:

Background

There are currently 575 pupils at the school. The current school buildings could readily accommodate a 16% increase in pupil numbers to 665 with DfE approval and without recourse to planning. Having reviewed the Transport Assessment and some of the other documents submitted with the application this does not appear to have been previously stipulated and therefore has not formed any part of the previous assessment.

The proposal is for an extension of the school by 3 years (Years 9-11) up to age 16. It has arisen because parents want greater choice of secondary education and, specifically, to remain at Crosfields. Affordability and co-education are key drivers at Crosfields. Girls tend to leave at age 11 (Year 6) so to be truly co-ed, the school needs to extend its provision to 16 to avoid the risk of Years 7 & 8 becoming unsustainable. The school expects incremental growth over 5-7 years - up to an additional 300 places.

Trip Rate / Traffic Generation

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, the applicant has advised that the Transport Assessment also identified that, of these additional pupils, several families attending the school have two or more siblings and some lift-share with other pupils not in the same family. The Transport Assessment estimates that this reduces residual car trips by around 14%. The school has advised that, currently, there are 140 children as siblings (i.e. 25% of pupils) which suggests a reduction of 14% is a significant under-estimate. The applicant's have undertaken a further turning count survey at the school entrances, dated January 2020. This shows that the total traffic leaving the school grounds between 07:30 and 09:00 was 343. Assuming all of these were parents having dropped pupils (i.e. disregarding non-school traffic from the houses along Crosfields Close), this is equivalent to 60% of total pupil numbers. This suggests that the combined estimated

reduction, taking into account siblings and lift-share, is actually very close to 25%. Given that this is based on actual survey data officers are happy to accept a reduction of 25%, which would equate to an additional 189 vehicle movements (252 movements - 25%).

The assessment within the TA of the busiest AM and PM hours for existing Crosfields traffic was based on traffic movement counts at the school accesses on Shinfield Road. This was undertaken in April 2018 and shown on the Traffic Diagram at Appendix L Figure 5 of the Transport Assessment.

However, the subsequent turning count survey undertaken in January 2020 show a significantly smaller number of Crosfields traffic movements in the AM peak than recorded in the April 2018 survey, with a significantly higher proportion of right-turn exit movements i.e. away from Reading. This is despite a small increase in pupil numbers since September 2019 from 550 to 575. The combined effect of this is that there are 55 fewer two-way Crosfields traffic movements on Shinfield Road south of the signalled junction with Whitley Wood Road than stated in the TA (274 rather than 329). This is however the base flows and therefore an assessment would be required to ascertain the actual implications this would have on the proposed flows.

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 (total vehicle movements 1,650)

PM 150 to and from Reading (total vehicle movements 1,221)

Existing and Proposed Vehicle Trips After Development

AM 502 to and from Reading (total vehicle movements 1,926)

PM 224 to and from Reading (total vehicle movements 1,390)

The applicant has disputed the increase in traffic previously stipulated by RBC; the applicant has therefore reviewed this. The applicants have stipulated that the April 2018 survey identifies 329 vehicles to and from Crosfields in the existing Crosfields busiest AM hour, which represents a 23.8% of the total traffic on Shinfield Road south of the signalled junction with Whitley Wood Road. However, the actual percentage equates to 20%.

In addition, the applicants have stated that taking into account the increase in background A327 flows (updated to 2026 using TEMPro), the worst case of (up to) 502 vehicles to and from Crosfields after development in the Crosfields busiest AM hour represents (up to) 29.3% of the total traffic on the same stretch of road. However, this percentage equates to 26%.

RBC Transport Development Control are happy to accept that the total increase in traffic would equate to 6% in the AM Peak. It should be stated that this is based on the 2018 baseline data and not the 2020 updated turning count data.

The applicant has stated that it is clear from the results of January 2020 turning count surveys at the school entrances that the pro-rata increase in vehicular traffic, as a result of the Crosfields development, will be less than the figure of (up to) 173 stipulated in the Transport Assessment. It is stated that using the same methodology, a more-realistic figure is an increase of (up to) 131. However, the latest information has not reviewed the proposed trip generation; only that of the baseline figures. Therefore RBC Transport Development Control are unable to determine whether this figure is correct. The actual proposed trip generation is therefore required.

As stated above, the school could expand by 16% to 665 pupils within its existing buildings and hence without recourse to planning, RBC Transport Development Control would be happy to accept a reduction to take account of this, but are unable to accept the figure specified currently as this is based on the above information; which has not been adequately presented to identify its accuracy.

Subject to the above the applicant has stressed that the assessment provided is considered to represent a worst case, as it takes no account of any reduction in traffic because of:

- Existing traffic which will no longer be generated (comprising former Crosfields pupils travelling to a different school. Typically, each year around 50% of leavers (typically around 35 in total) previously transferred to nearby schools, a significant proportion of whom would have made journeys passing through the Shinfield Road junctions with Whitley Wood Road or Elm Road). However, these trips would already be on the network and be captured by the baseline flows if in deed this did occur. In addition, these movements would also be associated with whatever school they are travelling to and therefore RBC Transport Development Control do not agree with this assessment, as this results in double / triple counting of these trips.
- New Crosfields traffic that would otherwise travel to other secondary schools, involving journeys passing through the Shinfield Road junctions with Whitley Wood Road or Elm Road (traffic diverted away from junctions). However, this is not a secondary school solely for the local community but for a far wider catchment. For example, the Transport Assessment states:

‘The school also operates a dedicated minibus service at the beginning and end of the school day for pupils living along a route from Henley, through Woodley.’

The response to RBC’s objections also states at paragraph 5.8 that:

‘It is the nature of an independent school such as Crosfields that it attracts pupils from a considerably wider catchment than usually the case with a school in the maintained sector. Accordingly, the proportion of pupils living within either walking, or cycling distance of the school or in a location close to a convenient public transport option, is considerably lower than generally the case for a school in the maintained sector. As a result, although Crosfields is committed, through its emerging Travel Plan, to encourage either car sharing or travel by means other than the car whenever practical, inevitably there will be a significant residual need to accommodate travel to and from school by car which this needs to be achieved efficiently and safely.’

It is also stated that Crosfields are aware that RBC are c1000 secondary places short and are looking to build a new secondary school on Richfield Avenue'

It is therefore extremely unlikely that, a shortfall of school spaces in Reading, which is likely to be mitigated by new school places in Reading, and the wide catchment area of Crosfields that pupils within Wokingham would travel along Shinfield Road to travel to an alternative school. As a result RBC Transport Development Control is unable to accept a reduction in trips based on this assumption as it is clearly identified that vehicle use will be the main mode of travel to and from the school and will result in an increase in vehicle movement.

- Traffic already generated, comprising older siblings of Crosfields pupils. As per the above, RBC Transport Development Control would be happy to accept a reduction in trips associated with siblings travelling to the school.
- Increasing likelihood of senior Crosfields pupils travelling independently as they progress through school (traffic not generated). Although older children do not currently attend the school and there may be an increase in journeys onto alternative modes, RBC Transport Development Control are unable to accept a reduction as there is currently no evidence presented to substantiate this.
- Mode shift as a result of Travel Plan implementation (A Travel Plan for staff and parents is being developed and will be in place before the planned school expansion is opened). Although the travel plan is aimed at reducing vehicle trips on the network, this would not feed into the junction assessments and therefore cannot be included as part of this assessment.
- The school day start and finish times are increasingly spread over a longer time period, which reduces the peak impact on the roads. This trend will continue with the senior school in place. Given that there would be no control over the start and finish times so as to minimize the impact on the surrounding Highway Network RBC Transport Development Control is unable to give this any weight in the assessment of this application.

Until the above has been undertaken RBC Transport Development Control is unable to ascertain what the exact increase in trips would be on the Highway Network.

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 6% increase in traffic an assessment of the surrounding junctions should be undertaken.

It is stated that the likely impact on the surrounding junctions was considered by Glanville and Wokingham Borough Council at the scoping stage. These junctions are well known to both Glanville and WBC and it was their joint professional opinion that, given both the small proportion of additional traffic movements anticipated at these junctions relative to the total traffic handled, it would be unlikely that any adverse impact would be sufficiently detrimental to warrant detailed quantitative assessment. However, given that these junctions are located within the boundary of Reading, the views of Reading Borough Council should have been sought at the pre-app stage.

The applicant has also stated that Reading Borough Council is also unwilling to disclose what they regard as an acceptable impact on the Shinfield Road junctions with Whitley Wood Road or Elm Road. However the applicant has continued to state correctly that '*there is no guidance in NPPG on acceptable impact of development traffic at Junctions*'. As such, RBC Transport Development Control is unable to give an acceptable level of impact until junction assessments have been undertaken.

As has been previously stated in correspondence with the transport consultant this complies with NPPG paragraph 009 which states:

Local planning authorities must make a judgement as to whether a proposed development would generate significant amounts of movement on a case by case basis (ie significance may be a lower threshold where road capacity is already stretched or a higher threshold for a development which proposes no car parking in an area of high public transport accessibility).

This paragraph may mainly deal with when a travel plan is required, but it still stresses that it is for the Local Authority to determine what increase in traffic would be acceptable and that a lower threshold may apply should the road capacity be already stretched. It therefore can only be assessed what impact the development would have once junction assessments have been undertaken. It is not the role of the Highway Authority to arbitrarily specify what increase may or may not be acceptable.

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.

Paragraph: 015 Reference ID: 42-015-20140306 dated 06 03 2014, continues as follows:

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.

The existing road network surrounding the application site is already heavily congested in the AM and PM peaks with site visits in the AM Peak period identify queues that extend back 800m to the site entrance of the ECMWF site with queues also identified on the Shinfield Road south approach, Elm Road and Whitley Wood Road. As a result assessments of the A327 Shinfield Road / Whitley Wood Road junction and A327 Shinfield Road / Elm Road junction must be undertaken. RBC Transport Development Control appreciate that there may be variances within the flows along the A327 Shinfield Road, as has been presented, but the junction could still be at or exceeding capacity and therefore any increase on the network would be material and could result in a severe impact. The assessment to date is therefore unacceptable to the Highway Authority of Reading.

In addition to the above, it is noted that the proposal includes the provision of additional drop off / pick up spaces for children. This will further encourage the use of the private car, but conversely, no improvements have been proposed to promote other more sustainable modes of travel. I note that Wokingham's Parking Policy allows each site to be determined on its own merits however RBC Transport Development Control still fail to see how this complies 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

The applicant has argued that the proposal does comply with the above policies given that:

‘the Crosfields development gives priority to pedestrian and cycle movements within the school grounds, facilitates access to high quality public transport, includes an interchange facility for school transport services and makes appropriate provision for people with disabilities and reduced mobility. Thus, the proposals create a safe, secure and attractive environment which minimises the scope for conflicts between pedestrians, cyclists and vehicles. It also allows for efficient servicing and caters for EVs in safe, accessible and convenient locations.’

All of these points relate to improvements to the internal arrangements of the school which RBC Transport Development Control do not argue will improve the movement of pupils around the school grounds. However, this alone will not improve the attractiveness of alternative modes of transport to help reduce car journeys to and from the school.

The school proposes a considerable increase in pupil numbers (300) with the Transport Assessment confirming 84% of the existing pupils already travel to and from school by the private car. However, the school is located directly adjacent to a bus route which is served by routes 3, 3b and 10 that link central Reading with Wokingham, Bracknell and Spencers Wood respectively and would serve a wide catchment area. Regardless the current bus usage for the school is just 11 pupils (2%); however, no proposal has been included to provide a crossing facility to allow pupils and staff to safely cross the A327 Shinfield Road to get to and from the bus stops located on the eastern side of the carriageway. Given the traffic flows along Shinfield Road this would be a barrier to those who would wish to use this as an alternative mode of travel, or even to walk through from Lower Earley to the east. Improvements of this nature would go a long way to move travel away from the private car.

Therefore, RBC Transport Development Control are still of the opinion that the proposals conflict with National Policy and 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. However, following a review of the travel plan RBC Transport Development Control accept that it is proposed to reduce all vehicle trips to and from the school by staff and pupils. However, this is unlikely to have any significant reductions given the catchment area of the school and the limited improvements to alternatives modes around the school.

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 and A327 Shinfield Road / Elm Road signalised junctions 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.

Summary

There are still actions required to ensure that the application has been assessed in compliance with Local and National Policy and these are as follows:

- The applicant has only provided updated analysis of the baseline data but has not provided any data for the proposed trips generated by the extended school. This should be provided based on the accepted reductions to account for the sibling data and potential expansion of the school within the existing school facilities.
- The A327 Shinfield Road / Whitley Wood Road and A327 Shinfield Road / Elm Road signalised junctions must be assessed.

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) in the first instance.

Yours sincerely

Jonathan Markwell (via email only)

Jonathan Markwell
Principal Planning Officer