

APPLICATION NO.: P16/S3630/O

APPLICANT: Gladman Developments Ltd

SITE: Land off Peppard Road, Emmer Green, Reading.

PROPOSAL: Outline Application for residential development of up to 245 residential dwellings (including up to 40% affordable housing), structural planning and landscaping, informal public open space and children's play areas, vehicular access from Peppard Road and Kiln Road and associated ancillary works. All matters reserved with the exception of the main vehicular access.

APPEAL STATEMENT ON BEHALF OF READING BOROUGH COUNCIL.

December 2017

1.0 Introduction.

- 1.1 Reading Borough Council was invited to comment on the planning application by South Oxon District Council. Reading Borough Council duly objected to the application, mainly on the grounds of adverse impacts on local infrastructure, via a decision of its Planning Applications Committee on 11th January 2017. Since the application was reported to Committee, significant developer pressure for development in South Oxfordshire, adjacent to the boundary with Reading Borough, has appeared through site promotions via the Reading Borough Local Plan process. It is clear that any appeal decision on the current proposals could set an unfortunate precedent for unplanned development on the boundary of the Borough with unforeseen detrimental impacts for infrastructure within the Borough and for the residents of the Borough.
- 1.2 This statement seeks to clarify the objections submitted by RBC to the planning application and clearly sets out what infrastructure needs to be provided should the appeal be upheld. It provides support to South Oxfordshire District Council in seeking to resist unplanned development. It provides context information to assist the inspector in understanding the detrimental impacts of unplanned development on the border with Reading Borough in this area. The application has already led to interest from other owners and developers in similar developments in this area. Reading Borough Council is concerned that a decision to uphold this appeal, contrary to policies in the development plan, may set an unfortunate precedent for other similar unplanned developments in an area where infrastructure is already under severe pressure.

2.0 Context Information

- 2.1 Reading Borough Council supports the plan led system and thus supports South Oxfordshire's decision to refuse the planning application which is the subject of this appeal in accordance with its development plan. The appeal site is not allocated in the South Oxfordshire Local Plan (Core Strategy and Local Plan) nor in its emerging 2033 Local Plan (see below). Development adjacent to the border with Reading or anywhere in the vicinity of Reading has not been the subject of any discussions with Reading Borough under the Duty to Cooperate. The application which is the subject of this appeal was unsolicited and had not been subject to the development plan process or in the context of any consideration that development in South Oxfordshire, north of Reading, is appropriate or can be properly served by infrastructure.
- 2.2 Reading Borough is a small urban authority with very tight boundaries that in many parts cuts through the wider urban area, particularly in the southern,

eastern and west parts of the urban area. North of the River Thames the boundary of the Borough with South Oxfordshire very closely follows the edge of the urban area. Reading Borough has a very close working relationship with the neighbouring authorities of West Berkshire and Wokingham in planning for the future growth and expansion of the Reading urban area. It is currently working jointly with these authorities, as well as Bracknell Forest Borough Council, in developing a strategic plan which seeks to accommodate the growth of the Western Berkshire Housing Market Area which includes the greater Reading urban area. Reading Borough will contribute to this growth through regeneration and intensification within the Borough, in particular in the central area and in South Reading. However, Reading will not be able to accommodate all its development needs up to 2036 within the Borough boundaries and has sought agreement under the Duty to Co-operate to export a small amount (currently estimated at 644 dwellings in the period up to 2036) of its development requirement to adjoining Berkshire Authorities. In particular, the Council is working closely with the 2 adjoining Berkshire unitary authorities on the development of a Garden Settlement of up to 15,000 dwellings at Grazeley, immediately to the south of Reading. A Memorandum of Understanding has been signed by all four authorities in the Western Berkshire HMA in October 2017 which recognises that a shortfall exists, and agrees that the full amount of need arising in the HMA should be met within its boundaries. It is therefore important to understand that Reading Borough Council is not in a position where it is expecting any of its unmet needs to be met within South Oxfordshire.

- 2.3 Reading Borough Council has never sought development in South Oxfordshire as a location for accommodating the future growth of Reading. Partly this is because of the rural nature of the areas close to this part of the boundary along with the close proximity of the Chilterns Area of Outstanding Natural Beauty.
- 2.4 However, the transport and other infrastructure constraints in the northern part of the Borough have long been seen as a significant constraint to significant new development north of the River Thames. Access across the River Thames within Reading is restricted to 2, single lane bridge crossings which operate at full capacity at peak travel times. Besides local traffic, these bridges also carry sub regional traffic along the A4074 (which connects to Oxford) and the A4155 (which connects to Henley). They are a significant bottleneck to the transport (road) network in this area. There is a further single track, traffic light controlled bridge crossing at Sonning to the east of Reading, but this also operates at full capacity.
- 2.5 Reading Borough Council has now approved its Pre-Submission Draft Reading Borough Local Plan, which covers the period 2016-2036. Consultation on this

draft plan will take place between the end of November 2017 and January 2018. Under this emerging plan, the Council has sought to identify all potential development sites within the borough in order to meet identified development needs within the Borough as far as possible before seeking agreement to locate any development within adjoining Boroughs. As part of this the Council has identified a small number of sites north of the river Thames. The following sites are proposed for allocation:

Reading University Boat Club (16-25 dw)

Part Of Reading Golf Course, Kidmore End Road (90-130 dw)

Land At Lowfield Road (24-36 dw)

Rear Of 200-214 Henley Road, 12-24 All Hallows Road & 4, 7 & 8 Copse Avenue (17-25 dw)

Rear Of 13-14a Hawthorne Road & 282-292 Henley Road (9-13 dw)

Rear Of 1 & 3 Woodcote Road And 21 St Peter's Hill (8-12 dw)

- 2.6 Taken together, these sites will provide for between 164-241 dwellings. They will have an impact on infrastructure in the area in particular, as shown by transport modelling of the level of growth proposed under the emerging local plan, adding to the bottlenecks at the 2 bridge crossings in central Reading. However, these allocations have been properly assessed and planned. Further development beyond the Borough boundary has not been subject to such detailed assessment and has not been properly planned.
- 2.7 While it is difficult to argue that the transport impact of an individual proposal is on its own unacceptable, no study has yet been made of the impact of a significant level of development beyond the boundary of the Borough. Any additional development beyond that allocated in the emerging Reading Borough Local Plan needs to be properly considered and planned taking account of the wider infrastructure and housing needs (including affordable housing needs) within the Borough.
- 2.8 The South Oxfordshire Local Plan 2033 Draft for Submission was published for consultation in October 2017. There are no strategic housing sites allocated close to the boundaries with Reading Borough in the Draft Plan. Whilst such sites have been discussed in general terms in duty to cooperate meetings between the 2 authorities, there was no indication that any allocations were anticipated. Consequently no work has been undertaken to plan for the prospect of such cross boundary development.
- 2.9 However, since the application was originally submitted it has become apparent that a number of landowners/ developers are seeking allocations for the development of other sites adjacent to the boundary with Reading

Borough for residential development. It is presumed that many landowners have put forward sites for inclusion in the South Oxfordshire Local Plan. A number have also recently sought to promote their sites through the Reading Local Plan, presumably on the basis that Reading would put pressure on South Oxfordshire to allocate their sites in order to satisfy identified need for housing that cannot be accommodated within the Borough.

2.10 The following sites have been promoted:

- Trustees of Phillimore Successors: Proposals for an urban Extension on their extensive land holdings at Playhatch (to the north east of Reading Borough);
- Gladman Developments: have put forward the appeal site as a strategic growth location that relates to Reading. The site comprises 13.48 hectares adjacent to existing residential development at Emmer Green;
- Lawrie Lee: 5 acre site which is "Land North of Gravel Hill" Emmer Green, which lies almost entirely in South Oxfordshire.

A number of sites have also been promoted to South Oxfordshire through the Strategic Housing Land Availability Assessment process. It should be noted that there are other sites that have been promoted in the past or which are in a similar location to the appeal site in relation to Reading that could also argue that they can provide for the future expansion of Reading.

2.11 If this appeal is upheld, there is now concern that it could set a precedent for the development of the several more sites which are currently being promoted adjacent to the boundaries with Reading Borough.

2.12 It is clear from the report to Committee on the planning application that school place capacity in the area is very tight and would not support further substantial additional development. As a result of demographic factors Reading Borough has faced significant pressure to provide a significant number of additional school places which has involved considerable investment in new primary schools and extensions to existing schools. That pressure has now moved to a need to provide additional secondary school places as the children move through the system. It is clear that there is no prospect of any spare capacity within schools in Reading to accommodate the pupil product of significant new development above that currently planned for, particularly if such development originates outside the Borough.

2.13 No consideration or assessments have been made in relation to the provision of health facilities or social/community infrastructure arising from new unplanned development in the area.

2.14 The main issue, as indicated above, is transport infrastructure which suffers particular capacity issues north of the River Thames. In the absence of any

provision for a Third Thames Crossing, an aspiration for which there has been campaigning for decades, there is little prospect of significant improvement to the severe congestion experienced in this part of the Borough. While there is a strategy to provide park and ride site(s) in the north of Reading, the benefits of any modal shift will not improve highway capacity. There is no available road space.

- 2.15 Such speculative, unplanned development could also have a damaging impact on the sensitive rural landscapes close to the AONB.
- 2.16 It is interesting that Gladman's responded to consultation on the Reading Borough Draft Local Plan at the issues and options stage, exhorting proper planning for infrastructure across boundaries as part of the Council's duty to co-operate with adjoining local authorities. The council agrees that this is right and proper but only where authorities see cross boundary development in a particular location as a preferred option. For the reasons outlined above, neither Reading Borough Council nor South Oxfordshire District Council see the area north of Reading as a possible preferred location for accommodating the future unmet development needs of Reading. For the reasons outlined above such unplanned development should be resisted.

3.0 Reading Borough Council Representations on the Planning Application (SB/DC)

- 3.1 The Inspector is referred to the report to Reading Borough Councils Planning Committee on 11th January 2017 (attached, along with an Update Report circulated prior to the Committee, at Appendix 1 to this statement. These documents are also available on the South Oxfordshire District Council Planning Register - <http://www.southoxon.gov.uk/ccm/support/Main.jsp?MODULE=ApplicationDetails&REF=P16/S3630/O#exactline>). The Committee resolved to object to the application on the grounds set out in the Committee Report as amended in the Update Report. The Committee resolved to send a copy of the report and all comments received to South Oxfordshire District Council.
- 3.2 The Council's objection mainly relates to the sustainability of the site and the inadequacy of infrastructure in the area to serve the development.
- 3.3 Subsequent to the January Committee, there was further correspondence between officers of the respective local planning authorities and with the applicants. Copies of that correspondence can be found on the South Oxfordshire District Council Planning Register (<http://www.southoxon.gov.uk/ccm/support/Main.jsp?MODULE=ApplicationDetails&REF=P16/S3630/O#exactline>). Further detail on that correspondence can be found in the next section.
- 3.4 The application was reported to the South Oxfordshire Planning Committee on 6th September 2017 with an officer recommendation of approval. The committee resolved to refuse the application. One of the reasons for refusal refers to the proposal failing to secure on and off site infrastructure necessary to meet the needs of the development which is relevant to the objections submitted by Reading Borough Council.

4.0 Reading Borough Council Infrastructure Requirements in the case that the appeal is upheld.

- 4.1 As set out above Reading Borough Council contend that the impact of the proposed development on infrastructure within Reading Borough would be required to be mitigated in relation to the following:

Highways: *The Highway Authority's response dated 9th December 2016 identified that the Peppard Road / Kiln Road junction, the Buckingham Drive / Peppard Road junction and the Kiln Road / Caversham Park Road junction were either not accurately assessed and / or the junctions exceeded capacity as a result of the additional movements generated by the development. Further clarity was therefore requested on the junction assessments undertaken so that an accurate review could be undertaken by Officers.*

- 4.2 Further clarification was submitted by the applicants Transport Consultant on 12th December 2016. This additional information identified the following:
- 4.3 It was confirmed through additional information that the Kiln Road / Caversham Road was adequately assessed and remained within capacity. Reading Borough Highway Authority therefore were in agreement with the applicant that no mitigation was required to this junction.
- 4.4 The Peppard Road / Kiln Road junction assessment was clarified and it was agreed that what was assessed took account of the actual junction design. The junction capacity assessment undertaken by the applicant was done so using PICADY which is the UK industry standard software, approved by the DfT, for the assessment and design of priority junctions. The assessment however identified that the junction exceeded capacity in the AM Peak when the existing situation was assessed, the AM peak assessment with development therefore identified that this would be worsened by the development. The PM Peak assessment did not exceed capacity when the existing situation was assessed but the PM Peak does exceed capacity as a result of the increased vehicle movements associated with the development.
- 4.5 The maximum capacity of the junction was exceeded and therefore mitigation to this junction was required so that unacceptable delays were not experienced at the junction as a result of the development. No mitigation proposals were submitted at this time but were subsequently requested.
- 4.6 As had previously been identified the capacity of the Peppard Road / Buckingham Drive roundabout junction exceeded capacity following the ARCADY assessment undertaken by the applicant. ARCADY is the UK industry standard software, approved by the DfT, for the assessment and design of roundabout junctions. As a result the applicant put forward a junction mitigation scheme for the Peppard Road / Buckingham Drive roundabout junction, this was reviewed and it was determined that the proposals resulted in the junction remaining within capacity and therefore was deemed acceptable.
- 4.7 An updated response was provided to the Planning Officer on 20th December 2016 and this was the basis of the information reported to Reading Borough Councils Planning Committee on 11th January 2017.
- 4.8 It was also reported that the Site Access arrangements were appropriate for the development subject to a Section 278 Agreement, the bus stops on Peppard Road were also accepted so as to encourage an alternative mode of travel, although it was acknowledged that these improvements to Highway Infrastructure were located within South Oxfordshire and therefore it was their responsibility to review the detailed design.

4.9 Bus Route 25 which would serve the bus stops created at the site entrance to help encourage an alternative mode of travel is currently at capacity in the peak times and provides no evening service. It had also been stated by the applicant within the Travel Plan that 63% of Peppard Ward residents currently drive to work. A S106 Contribution was therefore sought towards improving the capacity of route 25 and providing an evening service so that this could be used by residents of the development in order to reduce reliance on the private car and improve the sustainability of the application site. Given the scale of development it was requested that £300,000 be sought specifically to subsidise the increased capacity of this bus service during construction in order to mitigate the impacts of development and to encourage modal shift from the first occupation of the development.

4.10 The contribution was requested in line with Paragraph 35 of the National Planning Policy Framework (below) in order to reduce the impact on the Highway Network by encouraging alternative modes of travel.

35. Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. Therefore, developments should be located and designed where practical to

- accommodate the efficient delivery of goods and supplies*
- give priority to pedestrian and cycle movements, and have access to high quality public transport facilities*
- create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians, avoiding street clutter and where appropriate establishing home zones*
- incorporate facilities for charging plug-in and other ultra-low emission vehicles*
- consider the needs of people with disabilities by all modes of transport*

4.11 Subsequent to the planning application being reported to Reading Borough Planning Application Committee further updated information was submitted in relation to the junction by the applicant and clarification sought on the S106 obligation towards the bus service by South Oxfordshire.

4.12 A response on these matters was issued by letter directly to the South Oxfordshire Planning Officer dated 31st March 2017.

4.13 A junction design drawing was provided by the applicant, which included the provision of an additional lane on Kiln Road approaching Peppard Road, a

revision to the right turn lane on Peppard Road turning into Kiln Road as well as updates to the associated road markings. It was noted that the right turn lane on Peppard Road did not comply with National Standards contained with the Design Manual for Road and Bridges (DMRB), in that it did not comply with the required length however, the right turn is already significantly below standards and compliance would result in the relocation of the splitter island obstructing vehicular access to a neighbouring property. In this instance the proposed compromise was accepted as it constituted an improvement over the existing situation.

- 4.14 To take account of this revised junction layout the junction assessment was undertaken again and resulted in an improvement over the baseline scenario i.e. current operation without development. It is noted that the junction will remain marginally over capacity for both the AM and PM Peak Periods but this is marginal and the improvements are an improvement over the existing situation. The junction design and assessment is therefore considered to be acceptable to the Highway Authority in mitigated the impacts of the development at this junction.
- 4.15 In relation to the bus subsidy contribution further clarity was provided as to the level of contribution and to which Authority the S106 monies should be paid to.
- 4.16 As part of the response a detailed assessment of the bus service contribution was undertaken and this can be found Appendix A. As a result of this detailed analysis the contribution that would be sought by Reading Borough Council, should planning permission be granted was revised to £281,303. As was stipulated within the response to South Oxfordshire District Council this level of contribution does not ensure that the service is fully self-sufficient after year 3 but the assessment does not take account for additional residents along the route switching mode of travel to the bus and in turn increasing the income to that service.
- 4.17 It is Reading Borough Councils belief that it would appear appropriate given the majority of bus trips would be within Reading and the Councils relationship with Reading Buses, whom provide Bus Route 25 that the contribution should be paid to Reading Borough Council. The overall aim of the contribution is to increase capacity / frequency of the bus service and as a result it was explained that if South Oxfordshire District Council would like to be consulted on the proposals to achieve this then Reading Borough Council would be amenable to this.
- 4.18 As a result of the above, Reading Borough Council concludes that the applicant would be required to mitigate the impacts of the development by

way of a S106 contribution of £281,303 towards improvements to Bus Route 25. The applicant is also required to undertake Highway improvement works to the Peppard Rd/Buckingham Drive junction, Peppard Road / Kiln Road junction and footway improvements surrounding the site access, see list of approved plans below. These works will be subject to a Highways S278 Agreement with Reading Borough Council on land outside of the applicants control and outside of the determining Authorities boundary as such these works should be secured by way a S106 Agreement and are identified on the approved drawings listed below:

1502/14 Indicative Access Arrangements, Kiln Road

1502/20 Mitigation Scheme Peppard Road / Buckingham Drive

1502/21 Mitigation Scheme Peppard Road / Kiln Road Junction

- 4.19 Reading Borough Council also expressed at that time that the above contribution and Highways works should be secured if South Oxfordshire District Council were minded to approve the application, however continued to clarify that Reading Borough Council maintained its Highway objection as detailed within its letter dated 11th January 2017.
- 4.20 The Highway objection remained given that Reading Borough Council was not the determining authority and therefore it could not be guaranteed that the mitigation measures would be secured.
- 4.21 **Education:** Oxfordshire County Council have confirmed that there are sufficient places to accommodate children generated by the proposed development within South Oxfordshire District. However parents have the ability to express parental choice and within Reading Borough local school places in the immediate vicinity are at capacity. Therefore Reading Borough Council will not accept children from the proposed development or elsewhere in Oxfordshire. It is not therefore seeking any contribution towards future school infrastructure expansion to serve this development ?
- 4.22 **Open Space / Leisure Facilities:** The nearest recreational space to this development within Reading Borough is Clayfield Copse and Blackhouse Woods. As well as a Local Nature Reserve at Clayfield Copse there is a recreation ground comprising three adult grass football pitches and a changing pavilion. There is also a small skate park and a youth meeting shelter next to a large unmade car park. Beyond the skate park there are two large fields maintained as conservation grass areas. Clayfield Copse suffers significant accessibility problems during periods of wet weather, and paths are very muddy throughout the site.

- 4.23 Blackhouse Woods, at just over 5 hectares, abuts the eastern corner of Clayfield Copse. The whole area is a much valued local amenity and many dog owners drive to the site to walk. Blackhouse Woods and part of Clayfield Copse are designated ancient woodlands and as such are of prime importance to nature conservation, having had an unbroken woodland history for over 400 years.
- 4.24 There is no equivalent space within the development site, there are two small POS, one partially proposed as a NEAP and a linear type POS through the site. The new development will therefore result in an increase in use of the copse by foot and by car as residents at the eastern end may walk but those at the western end are unlikely to do so. This is backed up data from our parks and open spaces surveys (POSS) from 2005.
- 4.25 Reading Borough Council therefore seek monies for path works, signs and interpretation boards, dog bins and a fee for litter picking (once per month) as shown below. The costs are based on the FCs standard costs which are a cost drawn up by the FC and a working group of industry experts (e.g. the standard cost is £35 per metre for path creation on heavy sites). This equates to £640.57 per new housing unit.

Item	Unit Cost	Unit	Number of units	Total cost
Footpath construction - heavy sites	£ 35.00	Linear metre	2300	£ 80,500.00
Improvement to car park	£ 20.00	Square metre	2280	£ 45,600.00
Interpretation - boards A1 size	£1,200.00	Each	4	£ 4,800.00
Notice boards - without interpretative signs	£ 350.00	Each	1	£ 350.00
Simple bench	£ 165.00	Each	6	£ 990.00
Post and disk waymarkers	£ 30.00	Each	10	£ 300.00
Dog Bins	£ 400.00	Each	8	£ 3,200.00
Litter bins	£ 400.00	Each	8	£ 3,200.00
Litter picking	£ 150.00	Man	120	£ 18,000.00
			Total	£ 156,940.00

- 4.26 **Air Quality:** Reading Borough have concerns over air quality but understand that SODC are seeking to deal with this by condition.
- 4.27 **Affordable Housing:** Reading Borough experiences exceptional levels of need for affordable housing. This has been accepted by a Inspectors for numerous, recent appeals where the Council has sought affordable housing as part of the development of small sites of 10 or less dwellings. It is clear that any

development in this part of South Oxfordshire District adjacent to the boundary with Reading Borough, will be making provision for the Reading Housing Market. It follows that any affordable housing built in this area should largely be made available to residents in need of such housing within that market area. If the appeal is upheld, Reading Borough Council will expect that a significant proportion of any affordable housing provided as part of the proposed development will be made available to nominations from Reading Borough Council to house those on its Housing Register.

4.28 Reading is faced with significant housing challenges. Demand for genuinely affordable homes is increasing at a time when sale prices and rent levels are far beyond the means of the average resident. As of November 2017, there are 5312 households on the housing register seeking affordable homes in Reading, around 250 households in temporary accommodation and an average of 25 households presenting as homeless each month.

4.29 The 2016 Berkshire wide Strategic Housing Market Assessment indicates that Reading needs to deliver 699 units per annum, 406 (58%) of which need to be Affordable Homes, in order to meet housing need. .

4.30 Reading Borough Council will therefore be seeking that the Unilateral Undertaking acknowledges that a significant proportion of the agreed affordable housing provision be made available to residents from within Reading Borough.

5.0 Ensuring that Infrastructure Requirements are provided within Reading Borough in the case that the appeal is upheld.

5.1 The analysis above points to the fact that most of the impacts of this development and the necessary infrastructure that the development should be providing to mitigate its impacts, should the appeal be upheld, lies within Reading Borough. If the application site had been within Reading Borough, mitigation would largely have been straightforward, mostly through the Council's Community Infrastructure Levy (CIL) Charge. In this case, the CIL charge will be paid to South Oxfordshire.

5.2 The South Oxfordshire Council Planning Committee Report at paragraph 6.63 noted that the applicants had agreed to the securing of various infrastructure as part of a Section 106 agreement. For clarity, and in accordance with the report, Reading Borough Council are seeking that any unilateral undertaking should incorporate the following payments:

1. Highways

- Improvements to public bus service (Route 25) - £281,303
- Traffic Regulation Order (speed limit reduction on Kiln Road and Peppard Road £5,200

- A contribution of £15,990 towards bus stop infrastructure adjacent to the development site.
2. Education
Reading Borough schools are at capacity and it would not be our intention to consider expanding any of them for Oxfordshire children.
 3. Open space/leisure facilities (encompassing the use of Clayfield Copse and Blackhouse Wood)
 - a contribution towards mitigation works at Clayfield Copse of £156,940.
 4. Air quality
No contribution will be sought if the on-site mitigation sought by condition is secured, and subject to improvement to bus service and promotion of cycling and other non-car modes of transport are provided to reduce emissions.
 5. Provision of Affordable Housing
It is noted that within the scheme, 40% affordable housing (98 units) was sought by South Oxfordshire Officers. Due to the physical proximity and need for this type of unit within Reading Borough, this Council are seeking that a high proportion of the affordable housing units secured be made available to Reading Residents nominated from the Council's Housing Register.
- 5.3 Reading Borough Council has written to South Oxfordshire District Council, seeking a commitment to ensuring the payment of these sums and securing affordable housing provision in the event that the appeal is upheld.
- 6.0 Conclusion.**
- 6.1 Reading Borough objected to the appeal proposals mainly on the grounds of unacceptable transport impacts.
- 6.2 It should be noted that the Draft South Oxfordshire Local Plan does not need to take account of any unmet needs from Reading. The Draft Reading Borough Local Plan has not sought any agreement for South Oxfordshire to accommodate any of Reading's future housing needs.
- 6.3 Without prejudice, if the appeal is upheld, Reading Borough Council requests that the Inspector seeks a unilateral undertaking by the appellants to secure the following as set out in paragraph 5.2 above:
- Provision of Affordable Housing to meet local needs in Reading;
 - Contribution towards mitigation works at Clayfield Copse;
 - Highway and other transport improvements
 - Bus Service Subsidy.

Appendix 1 Summary of comments made by Gladman Developments to the Reading Draft Local plan.

Gladman Developments Ltd	Whilst Gladman recognise that the Duty to Cooperate is a process of ongoing engagement and collaboration, as set out in the PPG it is clear that it is intended to produce effective policies on cross-boundary strategic matters. In this regard, Reading Borough Council must be able to demonstrate that it has engaged and worked with neighbouring authorities, alongside any existing joint working arrangements, to satisfactorily address cross boundary strategic issues and the requirement to meet any unmet housing needs. This is not simply an issue of consultation but a question of effective cooperation on a range of inter-related planning issues, such as the need for effective infrastructure planning. This is required in order to ensure a comprehensive approach to infrastructure provision is being taken across an urban area that crosses administrative boundaries, for example in order to ensure that sufficient school places can be made available to support growth.	Noted. No change proposed. The Council has prepared the Local Plan in compliance with the duty to co-operate, and a full Duty to Co-operate Statement will be prepared that details the measures undertaken.
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Appendix A: Detailed Assessment of the bus service contribution

Additional bus cost and revenue predictions for Peppard area development plans.

The Reading Buses' operated Reading to Sonning Common bus route 25 is served half hourly Mon-Sat with an evening service which ceases at 20.00. A Sunday service runs hourly from 09.00 to 18.00. Route 25 buses in peak hours become well filled from Emmer Green to town so additional housing developments anywhere en route are likely to overload existing peak buses. The half hourly service is not a 'turn up and go frequency' but the addition of 1 extra bus resource would allow 3 buses per hour through the day Mon-Fri including peaks. (The Saturday service of 2 buses per hour is assumed to be sufficient for any additional Saturday custom from the new development.) Peak time car commuter congestion between Emmer Green and Central Reading causes bus journeys at these times to be extended so it is assumed that the one extra bus runs to and from Sonning Common (Brinds Corner) and turns by means of a loop, not extending to the terminus for the other buses at Peppard Common (Unicorn).

In addition for a development to be considered sustainable an evening service 6 days a week to 23.00 would be needed. These additional hourly evening journeys are included in the assessed bus costs. No additional Sunday service has been included.

Cost assumptions are based on similar calculations for a de minimis service within RBC which runs Mon-Fri. Assessed bus costs therefore total £150,900 for year 1 prior to any passenger fare revenue. This includes all costs associated with providing an increased bus service.

The cost to provide support to allow the enhanced bus service to operate for a three year period is dependent on how quickly the development provides new residents and what proportion of new residents become bus customers. To encourage take up of bus use the enhanced bus services will need to be available early on in the development timetable.

Based on a three year build programme it is assumed that houses will be built as follows; year 1: 50 units, year 2: 100 units, year 3: 95 units to give a 245 unit total. Based on a house occupancy average of 3.661 (census data) that will mean total residents of 183 in year 1, 549 in year 2, 897 by the end of year 3. Taking the need for an enhanced service, into account it is proposed that the additional bus is introduced when 25 units are completed thus 91 people likely to be in residence.

Assuming this is at point 0.5 in the programme and that 11% (census data) of residents will use the bus there would be 10 extra bus customers at this point. By point 1 11% of 183 will be 20 bus customers. The mean point for year 1 in terms of bus use (point 0.5 to 1.5) is at point 1.

From point 1 to point 2 100 units will be built so bus customers at point 2 will be 11% of 549 which is 60.

From point 2 to point 3 95 units will be built so bus customers at point 3 will be 99.

Three years of bus use takes the programme to point 3.5 which is half a year after the development is assumed to be finished (previous developments have slowed down in response to market forces thus delaying expected increases in bus use).

The averages for each bus year use are taken to be year 1 20, year 2 60, year 3 99.

The cheapest ticket for such commuter use would be the weekly Simply Reading ticket at £15 online or £17 on bus. A day return from the site is £4 so the weekly ticket is cheaper. It is assumed most people would buy such a ticket on line but given uncertainty over future prices a £16 ticket per person for 48 weeks is assumed.

In addition there is likely to be use of the bus route to get to secondary school by pupils going into Reading and to Chiltern Edge. No representative figures are available so a notional 5% of resident numbers have been used and the online Boost ticket @ £11 for 38 weeks.

Calculations of costs and incomes.

Year 1 bus cost = £150,900

Income = 20 customers @ £16 x 48 = £15,360 plus 9 school @ £11 x 38 = £3762 total £19,122

Cost of subsidy = £131,778.

Year 2 bus cost = £153,918

Income = 60 customers @ £16 x 48 = £46,080, plus 27 school @ £11 x 38 = £11,286 total £57,366

Cost of subsidy = £96,552

Year 3 bus cost = £156,996

Income = 99 customers @ £16 x 48 = £76,032, plus 45 school @ £11 x 38 = £18,810 total £94,842

Cost of subsidy = £62,154 (Fares revenue at this point equates to 60% of cost of operation).

The total cost of three years' bus operation (starting from the completion of 25 units) is estimated to be £461,814.

The total customer income for the three years is calculated as £171,330

This leaves a need for subsidy of £290,484,

After year 3 the bus does not appear to be financially self-supporting with the low rate of public transport use assumed for this development. However the enhanced service of three buses an hour should also encourage increased use from other South Oxon and Emmer Green residents. This additional income has not been quantified.

To encourage greater bus use measures will need to be taken by the developer such as providing free initial period season tickets for each unit occupancy and providing bespoke travel information on how to travel around the Borough of Reading and South Oxfordshire,

not simply issuing bus timetables. Without such initiatives or a faster build programme the bus company may well need a bus subsidy for longer than 3 years.

Stephen Wise

Senior Transport Planner
Reading Borough Council

5th Dec 2017.