

1 Derby Road Reading

Relaxation of conditions to allow wider uses within Use Class D

Traffic statement

November 2015



The proposal is to relax the conditions imposed on previous permission to allow a wider use of the premises currently used and restricted to use as a physiotherapy clinic and to ease the conditions in respect to the owners of the clinic being resident on site. Planning permission was originally granted in 1994 for this use and a variation granted in 2010 to remove the personal condition from the permission. The two conditions, subject of this application were applied in its stead. As part of the original permission the parking layout for staff and clients was approved by RBC and that letter is attached with this statement. The car parking has continued on this basis since that date without issue.

Following a pre application meeting between the applicant, their agent, Reading BC Planner and Highway Officer, we were recommended that to prove the case for traffic a traffic statement was required to overcome the objections made by residents and to clarify the likely traffic generation to allow the Highway officer to assess the likely impact on two issues, road capacity and car parking generation.

We attach a plan indicating the car parking arrangement on site and to which group the parking is allocated. There has been an increase in car parking on site since the original planning permission was granted some 20 years ago. The

addition of two spaces on the road frontage on land owned by the applicants has increased parking by two. However the applicants advise that the site worked well for approximately 16 years until they were added.

Derby Road is a 5.5m wide road allowing for easy passage for two cars to pass in opposite directions. It is a private road and run by a committee for the benefit of the residents. There are no road restrictions i.e. yellow lines along the road so parking on road is unrestricted. At the times of visits to the area, (Wednesday PM and Saturday AM), only 2 cars were parked on street along Derby Road.

We have taken car-parking provision from the Reading BC council car parking standards document. This document outlines the policies relevant and outlines the principles for imposing the standards. Car parking is taken to be the maximum car parking per site not minimum. The application site is located in Zone 2 identified by the parking standards document.

The levels set in each zone reflect access to alternative modes and are partially influenced by the variants set out in PPS3: Housing Paragraph 51, e.g. promoting good design and the need to use land efficiently. For residential developments car parking levels are based on access to alternative modes, but are also influenced by factors such as expected levels of car ownership¹. Such ownership does not necessarily need to relate directly to modal choice for some journeys, and the provision of parking at the workplace or other destinations may be more influential than the inability to park at home. What must be avoided are standards that force car owners to seek alternative parking locations for additional vehicles, such as on the street or in private car parks. Shifts in car ownership may only come about as travellers find that they can make journeys by alternative modes.

The car parking standards set, except for those relating to residential (C3), are to be imposed as maximums, unless a developer can prove that their development requires parking at a higher level for exceptional circumstances. In accordance with Policy EC8 of Planning Policy Statement 4: Planning for Sustainable Economic Growth Local Planning Authorities should set maximum parking standards for non-residential development which takes into account a range of matters. These include, the need to: promote sustainable transport choices; reduce carbon emissions; take into account levels of public transport accessibility; reduce the amount of land needed for development; and tackle congestion. With respect to commercial development this

¹ Census data from 2001, updated March 2007 has been used to inform the residential (C3) standards. 11

means a set maximum based upon Gross Floor Area (GFA), The parking standards provision identified for residential are based upon spaces per dwelling.

The Application site lies within Zone 2 Primary Core area, which is described as:

Zone 2, Primary Core Area

This zone directly surrounds the Central Core Area and extends to walking distances of 2 kilometres from the centre of Reading. Typically this zone is well served by public transport, with buses continuing either into or out of the Central Core Area via this zone. Much of this area is within acceptable walking distance (400m) of either the main railway station, or Reading West railway station. Walking and cycling in this area tends to be encouraged through the provision of wide and safe footways, with some dedicated or shared cycle ways. The areas within Zone 2 also typically have

smaller local centres, providing day-to-day access to retail and some commercial facilities. Future growth in these areas is likely to be more mixed than in the core area, with larger amounts of residential than commercial space.

The Policies

The NPPF is the central government guidance on all planning matters. At para 32 it states: '*All developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment. Plans and decisions should take account of whether:*

- The opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure;*
- Safe and suitable access can be achieved for all people*
- Improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development. Development should only be prevented or refused on traffic grounds where the residual cumulative impacts of development are severe.'*

These parking and design standards are reflected in some of the Council's Core Strategy Policies:

CS4: Accessibility and the Intensity of Development - requires development within the Borough to be close to services and facilities by walking, cycling and public transport.

CS7: Design and the Public Realm – encourages design that provides safe and accessible environments.

CS20: Implementation of the Reading Transport Strategy (Local Transport Plan 2006 – 2011) – including provision of measures that will make alternatives to private cars (such as walking, cycling and public transport) more attractive.

CS23: Sustainable Travel and Travel Plans – major development proposals will not be granted permission unless there is a commitment towards sustainable transport facilities and travel plans.

CS24: Car and Cycle Parking – maximum car parking standards and cycle parking requirements will be applied in relation to the accessibility of locations within the Borough to sustainable transport facilities, particularly public transport.

Whilst some of the references to Government legislation are out of date the remainder of the text is still valid in respect of this proposal

The Standards.

We have lifted from the car parking standards the relevant standards to those uses we are evaluating in this document.

Use type	Zone 2 spaces
C3 Dwelling House 3 bed	2
D1 Clinic/ Health Centre	2.5 per consulting room + 1 per FTE staff
D1 Doctors, Dentist & Veterinary Surgery	1.5 per consulting room Plus 1 space per General Practitioner

D1 Day Nurseries with fixed pick up and drop off times	1 per 3 FTE staff, 1 drop off space per 5 pupils
D1 Day Nurseries with flexible pick up and drop off times	1 per 3 FTE staff, 1 drop off space per 10 pupils
D1 Primary Education	1 per 2 FTE staff, 1 drop off space per 10 pupils

There are standards relating to bicycles but this has not been raised as an issue so we are not addressing further but to say that in general one space and one stand are required for the proposed uses, which is achieved on site. Given that most clinics relate to injury or illness bicycle use is low.

Current planning restrictions

A planning condition restricts the number of treatment rooms and it is not part of the proposals to lift the restriction or to raise the number of treatment rooms.

A planning condition restricts the use of the house to the owners of the clinic.

A planning condition restricts the use of the clinic to a physiotherapy use

1. Car Parking

Residential Parking

The requirement for the house on site is 2 spaces. There is an unusual parking arrangement for the house in that it has a drive through garage to the space beyond. However, through the research below the two spaces shown on the road frontage, which lies with the ownership of the site could act as the two residential spaces were the house not be linked to the use of the clinic

Clinic Parking

The applicants have contacted a large number of other types of clinic within Use Class D that might be considered appropriate to move into the existing premises, which comprise a house and three physiotherapy treatment rooms.

The queries of the other clinics sought to establish the normal working day for the various types of uses, to include working hours, breaks, length of appointments and the administrative part of the working day. As would be expected there was some variation over the working day but a commonality amongst appointment times dependant on types of treatment.

The pre application meeting agreed that the use of the premises by another type of clinic would be likely to generate the same sort of traffic movements and parking requirements but we have taken a breadth of other uses to test this agreement.

We have included the parking standard for a D1 Clinic/ Health centre for clarification. We do not consider that the proposed uses likely to be interested in these premises would fall into the category of a Health Centre.

The Parking Standards do not specifically cover the various types of clinic that we have explored with only doctors, dentists and vets being addressed but as agreed at the Pre application meeting the various types would be likely to generate about the same types of traffic. This has been proven with the research undertaken. In fact, the heaviest traffic potential is the dentist (at worst case), and we consider that meets the parking requirements for all the clinic uses.

Also the site would be compliant for uses such as day nurseries, whatever the type of day arrangements were in place.

Operational Statement of current use (Physiotherapy clinic)

Clinic opening hours 8.30 a.m. to 8.30 p.m. Mon-Fri and 8.30 a.m. to 2.00 p.m. Sat

Three treatment rooms (restricted by condition on the planning permission)

Each practitioner works a maximum of an 8 hour day (7 hours when allowing 45 mins lunch and 15 mins coffee break).

Each treatment room has staggered start times i.e. not all start at 8.30am to allow for better flow of clients and parking

Usual appointment system is 1 new patient appointment (40 mins duration) to six follow-ups (30 mins duration) with 20 mins admin time at beginning and end of clinic.

i.e. 12 appointments in each treatment room on weekdays = 36 clients a day

and 9 appointments in each treatment room on a Saturday = 27 clients

Absolute maximum usage (using all three treatment rooms constantly for 12 hours a day).

i.e. 20 appointments in each treatment room = 60 clients a day (5 cars per hour).

Operational statement of use for Osteopathic clinic

(averaged from enquiries of 4 local clinics)

Assume likelihood that clinic opening hours would be similar i.e. 8.30 a.m. to 8.30 p.m. Mon - Fri and 8.30 a.m. to 4 p.m. on a Saturday

Assume same number of treatment rooms (3) with each practitioner working an 8 hour day (7 hours allowing for 45 mins lunch and 15 mins coffee break).

Usual appointment system is 1 new patient (1 hour duration) to six follow-ups (30 mins duration) with 20 mins admin time at beginning and end of day.

i.e. 10 appointments in each treatment room on weekdays = 30 clients a day

and 9 appointments in each treatment room on Saturdays = 27 clients

Absolute maximum usage (using all three treatment rooms constantly for 12 hours a day).

i.e. 17 appointments in each room = 54 clients a day (4.5 cars an hour)

Operational statement of use for Chiropractor clinic

(averaged from 3 local clinics)

Assume clinic hours similar i.e. 8.30 a.m. to 8.30 p.m. Mon – Fri and 9.00 a.m. to 4 p.m. Sat

Assume same number of treatment rooms (3) with each practitioner working an 8 hour day (7 hours allowing for 45 mins lunch and 15 mins coffee break).

Usual appointment system is 1 new patient (1 hour duration) to six follow-ups (3 x 20 mins and 3 x 30 mins) with 20 mins of admin time at beginning and end of day.

i.e. 12 appointments in each treatment room on weekdays = 36 clients a day

= 36 clients a day (4.5 cars an hour)

and 10 appointments in each treatment room on a Saturday = 30 clients

= 30 clients (4.28 cars an hour)

Absolute maximum usage (using all three treatment rooms constantly for 12 hours a day).

i.e. 20 appointments in each treatment room = 60 clients a day (5 cars per hour)

Operational statement of use for Dental clinic

(averaged from 4 local clinics)

Clinic hours similar from 8 a.m. to 7.30 p.m. Mon – Fri and 9.00 a.m. to 1.00 p.m. on Sat

Same number of treatment rooms (3) with each practitioner working an 8 hour day (7 hours allowing for 45 mins lunch and 15 mins coffee break).

Usually two dentists require one hygienist who works in a separate room.

Usual appointment system for dentists runs in 15 minute blocks with some appointments lasting 15 mins, some 30 mins, some 45 mins and some 1 hour depending on procedures with 15 mins admin time at the beginning and end of the day.

i.e. 11 appointments in two treatment rooms weekdays = 22 clients a day

and 6 appointments in two treatment rooms on a Sat = 12 clients

Plus appointment systems for hygienists run on average at 45 mins each.

i.e. 8 appointments in one treatment room a day weekdays

and 4 appointments in one treatment room on Saturday

Total for dental clinic = 30 clients on weekdays and 16 clients on Saturdays.

Absolute maximum usage (using all three treatment rooms constantly for 12 hours a day).

i.e. total of 92 clients for dentists and 14 for hygienist = 33 clients a day

This maximum usage supplied as worst case scenario but is unrealistic as it would be physically impossible for the dentists to sustain 15 mins appointments throughout the 12 hours without a break and this would only allow for check up appointments and no other types of treatment, including fillings or other orthodontic work.

Operational statement of use for Nursery - children aged 3+

(averaged from 2 local nurseries)

Nursery hours would range from 7.30 a.m. to 4 p.m. Mon - Fri

Space allocation is as per guidelines of one child per 2.3 square metres

i.e. 15 children maximum capacity

Staff allocation as per guidelines of 1 member of staff to every 8 children

i.e. two members of staff

Parents drop off children between 7.30 - 8.30 a.m. and collect between 3.00 - 4.00p.m. = maximum of 15 cars stopping for a few minutes only over the space of an hour (averages one car every 4 mins) in the morning and the evening. No other traffic during the day.

**Operational statement of use for Acupuncturists / Complementary
Therapists / Psychologists / Counsellors**

(averaged from 4 local clinics)

Clinic hours similar i.e. 8.30 a.m. to 8.30 p.m. Mon – Fri and 9.00 a.m. to 1.30 p.m. Sat

Same number of treatment rooms (3) with each practitioner working an 8 hour day (7 hours allowing for 45 mins lunch and 15 mins coffee break).

All appointments run at hourly intervals. No appointments are ever shorter than this.

One practitioner therefore sees a maximum of 7 appointments a day weekdays and 4 appointments on Saturdays in each treatment room.

i.e. 21 clients a day on weekdays and 12 clients on Saturdays (2.6 cars an hour)

and 12 clients on Saturdays (2.7 cars an hour)

Absolute maximum usage is 12 appointments in each treatment room

= maximum of 36 clients a day (3 cars an hour)

Operational statement of use for Massage Therapists

(averaged from 3 local clinics)

Clinic hours similar i.e. 8.30 a.m. to 8.30 p.m. Mon – Fri and 9.00 a.m. to 1.30 p.m. Sat

Same number of treatment rooms (3) with each practitioner working an 8 hour day (6.5 hours allowing for an hour for lunch and a 15 mins tea break morning and afternoon).

Usual appointment system is a combination of 50% of 30 minute appointments and 50% of one hour appointments with 15 mins at each end of the day to prepare and clear up.

i.e. 8 appointments in each treatment room weekdays

= 24 clients weekdays (3 cars an hour)

and 6 appointments in each treatment room on Saturdays

= 18 clients on Saturdays (3 cars an hour)

Absolute maximum usage (using all three treatment rooms constantly for 12 hours a day).

i.e. 14 appointments in each treatment room = 42 clients a day (3.5 cars an hour)

Operational statement for use by one-to-one adult tutors

(taken from 1 local sample)

Opening hours similar i.e. 8.30 a.m. to 8.30 p.m. Mon – Fri and 9.00 a.m. to 1.00 p.m. Sat

Same number of rooms (3) with each tutor working an 8 hour day (7 hours allowing for 45 mins lunch and 15 mins coffee break).

3 staff

Sessions are one hour long

i.e. 7 clients in each room over the course of a weekday

= 21 clients on weekdays (2.6 cars an hour)

and 4 clients in each room on a Saturday

= 12 clients on Saturdays (3 cars an hour)

Absolute maximum usage (using all three treatment rooms constantly for 12 hours a day)

i.e. 12 appointments in each treatment room = 36 clients (3 cars an hour)

Operational statement for use as Health Screening Clinic

(taken from 1 sample)

Opening hours similar i.e. 8.30 a.m. to 8.00 p.m. Mon – Fri and 9.00 a.m. to 1.00 p.m. on Sat

Same number of treatment rooms (3) with each practitioner working an 8 hour day (7 hours allowing for 45 mins lunch and 15 mins coffee break).

Usual appointment system is hourly appointments with 15 mins admin time at the beginning and end of the day.

i.e. 6 appointments in each room weekdays

= 18 clients a day (2.25 cars an hour)

and 4 appointments in each room on Saturdays

= 12 clients on Saturdays (3 cars an hour)

Absolute maximum usage (using all three treatment rooms constantly for 12 hours a day)

i.e. 12 appointments in each room = 36 clients a day (3 cars an hour)

Operational statement for use as Audiology Clinic

(taken from 1 sample)

Clinic opening times would mostly be 9.00 a.m. to 5.30 p.m. with one late night to 7.30 p.m. and Saturdays from 9 a.m. to 4 p.m.

Same number of treatment rooms (3)

Each practitioner works a maximum of an 8 hour day (7 hours when allowing 45 mins lunch and 15 mins coffee break) and every third Saturday.

Appointment system is hourly with 15 mins admin time at the beginning and end of the day.

i.e. total of 7 appointments in each room on normal weekdays

= 21 clients (2.47 cars an hour)

9 appointments in each room on the late night

= 27 clients (2.57 cars an hour)

6 appointments on a Saturday (1 car an hour)

Maximum usage (using all three treatment rooms constantly for 12 hours a day, no breaks included)

i.e. 12 appointments in each room = 36 clients a day (3 cars an hour)

If all three rooms were used on a Saturday from 9 a.m. until 4 p.m.

i.e. a total of 6 appointments in each room = 18 clients (2.57 cars an hour)

Operational statement for use as an Ophthalmology clinic / Optician

(averaged from 2 samples)

Clinic opening hours 8.30 a.m. to 5.30 p.m. and Saturdays from 9 a.m. to 4.30 p.m.

Same number of treatment rooms (3).

Each practitioner works a maximum of an 8 hour day (7 hours when allowing 45 mins lunch and 15 mins coffee break) on five days of the week. If working on Saturdays the practitioner has a day off during the week.

Ophthalmology and opticians often work together in a clinic, although they would require separate treatment rooms, which is why these disciplines have been considered together. Assume one room for Ophthalmologist and 2 for Optician

Usual appointment system for Ophthalmology is hourly appointments with 15 mins at the beginning and end of day for admin.

Usual appointment system for Optician is a combination of 20 mins, 40 mins and hourly appointments with 20 mins admin time at the beginning and end of day.

i.e. **Use solely by Ophthalmologist** would mean 7 appointments on weekdays = 7 clients a day

and 6 appointments on a Saturday = 6 clients (0.8 cars an hour)

Use solely by Opticians would (assuming 2hrs @20 mins 3hours @40 mins and 2hrs @1hr) mean 11 appointments in each room on weekdays = 22 clients a day (3.14 cars per hour)

and 9 appointments in each room on a Saturday = 27 clients (3.3 cars an hour)

Absolute maximum usage would be if a late evening were to be included e.g. up to 7.30 p.m.

clients would then increase to 9 clients a day for Ophthalmologists only (1 car an hour)

and 30 clients a day for Opticians only (assume 1hr@20mins and 1@1hr (3.3 cars an hour)

Operational Statement for use by Caversham Prep School

The residential part of 1 Derby Road would continue to be occupied by the current owners and the Physiotherapy clinic would be rented by Caversham Prep School.

The four car parking spaces, currently for use of clients, will be used for named school staff cars.

All other car parking on the site would be for residents of existing house to ensure easy access and egress for both parties.

Entry to 1 Derby Road by all other staff and children would be via a rear entrance made through room 4 in 1 Derby Road which backs immediately on to the Caversham Prep School (14A Peppard Road). This would therefore not involve any traffic entering or leaving Derby Road, apart from the four staff cars.

*The rooms in the Annexe part of 1 Derby Road would be unsuitable for large classes of children and would therefore be used for such things as a psychology room, sick room or for specialist teaching small numbers of children i.e. Remedial, music etc.

*The space requirement by the department of education of 2.3 square metres per child would indicate that assuming all walls removed, a maximum of 15 children could be catered for within the Annexe part of 1 Derby Road.

No children would have access to the outside area at the front of 1 Derby Road and Ofsted regulations state that a secure passageway between the rear of 1 Derby Road and the grounds of Caversham Prep School must be made.

There is no outside recreation space associated with this use on site. All recreation would occur on existing site.

*Children would occupy the Annexe part of 1 Derby Road from approximately 9 a.m. to 3.30 p.m.

2. Highway Capacity

The pre application discussion highlights that the proposals needed to assess the impact of the proposals on the capacity of the road to accommodate them.

The LPA have granted permission for a Physiotherapy clinic on site. This has operated for 20 years without any incident in respect of either parking or traffic. Traffic movements are light, with 2 staff arriving before opening, before 0830hrs. The applicant lived on site making 4 employees. Four car parking spaces can be provided for staff to the side and rear of the building if the residential arrangements changed.

Thereafter, a flow of clients would come to the clinic and park in the allocated spaces. Appointments are staggered so that people do not arrive at the same time producing three cars per hour over the course of the day.

In peak hours 7 (5in, 2 out) cars in the morning and 6 (3in, 3out) cars in the evening would enter and leave the premises.

As seen above the traffic figures for any of the other uses would be in the same region. Educational uses would have no traffic movements during the day but all leaving probably before evening peak arrived. This figure would be 4/5 cars.

Derby Road is a large residential complex with several roads and closes coming off it. There are two entrances, one off Peppard Road and one from Henley Road. We made a count of the houses and types of housing along Derby Road, Moss Close, Ellesmere Close and Field View but chose not to take a count in the other roads in the complex, namely Grosvenor Road, George Close, Wilwyne Close, Lady Jane Court and Greystoke Road. Those numbers it is estimated would be at least the same if not more bed spaces than those counted.

The number of residential properties was significant and was a mixture of housing between 5 bed detached accommodation, single bed flats to retirement homes. There are also two entrances/exits to Queen Anne's School in Derby Road, which although not used heavily by the school is used by some parents for drop off and pick ups and the beginning and end of the school day. Neither of these accesses is really close to the application site. A table of accommodation is attached. There are a total of 207 units in Derby Road with a total of 454 bed spaces (an average around 2.5 beds per unit).

It is accepted through research that small accommodation generates around 6-8 movements per day and the larger units around 12-14 movements per day. Taking an average of 10 movements per day Derby Road alone would generate 2070 movements per day, which if split between the three egresses would be 690 movements through the Peppard Road gates adjacent to the application site. This takes no account of the additional movements of parents of school children or movements generated by some of the other roads in the complex. Assuming that the remainder of the complex of residential streets produces approximately the same number of houses and movements around 1400 movements would be made through the Peppard Road /Derby Road access.

Taking the existing use of 72 movements over a twelve hour period and assuming that all traffic entered and left by the Derby Road/Peppard Road junction, this would contribute a maximum 5% of the movements at this junction. Any split in the movements would, of course reduce this figure. This situation has occurred for the past 20 years. There is no evidence of traffic issues at the junction. Traffic speeds are generally low on this part of Peppard Road due to queuing at the Henley Road Junction. There are fairly severe speed humps at the entrance to Derby Road at the Peppard Road end and all along Derby Road which restricts the traffic speed to a maximum of 15 mph.

It has been demonstrated above that the traffic generation from any of the other proposed uses would not have a significant effect on the traffic entering and leaving the site over and above the traffic already generated by the existing use. Therefore the impact on the road as a whole would remain unchanged from the present use.

The capacity of the highway is unchanged as a result of any of the proposed uses and will not harm the free flow of traffic.

The NPPF paragraph 32 requires traffic statements where development would generate significant amounts of movement and only be prevented or refused on transport grounds where the residual cumulative effects of development are severe. Given the parity of traffic generation from these proposals there is doubt whether this transport statement is justified but in any case it is clear that the cumulative effects of the proposals cannot be considered severe and therefore the application cannot be refused on traffic grounds.

Local Objections

We have seen three local objectors letters from the website although we are advised that there were more.

We have some observations:

There are two letters from Ellesmere Close, which is a substantial distance away from the application site and is unlikely to be affected directly by traffic movements. They object on traffic intensification, citing lack of pavements. The Council have allowed a number of new developments in Derby Road over the years that will have intensified traffic on this road. The proposal will not intensify traffic so the same conditions will be maintained. We note that they have indicated that the road is a rat run during school times and when traffic is busy on Peppard Road. We have not been able to quantify this traffic and thus is not part of traffic figures for existing traffic put forward in this document so existing traffic levels may be higher than envisaged thus reducing further the impact of this site in road traffic terms.

The third letter mentions traffic in the last paragraph fearing greater movements. We have addressed this matter in this statement.