

2-4 Church Road, Caversham, Reading, RG4 7AE
Response to Reading Borough Council's Transport Development Control
Comments – Application No. 240068

1.0 Introduction

- 1.1 This document has been prepared on behalf of Farrell & Clark by Glanville Consultants in response to comments by Reading Borough Council's Transport Development Control (TDC) Officer, in respect of a proposed mixed-use (Class E(a-f) and Class C3) development at 2-4 Church Road, Caversham, Reading, RG4 7AE.
- 1.2 A full planning application (application no. 240068) was submitted to Reading Borough Council (RBC) for the following:
- "Change of use and works of conversion from former bank (Class E) to 2 ground floor commercial units (Class E (a-f only)) and 3 upper floor dwellings (Class C3), including a part second floor extension and separate rear dormer roof extension, shopfront alterations and associated works".*
- 1.3 Although no objection was raised to the principle of the development, RBC's TDC Officer objected to the 'car-free' nature of the proposals on 1 March 2024, noting that:
- "The proposed development does not comply with the Local Planning Authority's standards in respect of vehicle parking and, as a result, is in conflict with local plan policies TR1 and TR3 and TR5 of the Reading Local Plan 2019."*
- 1.4 The TDC Officer also requested that the form of cycle parking is changed to Sheffield stands.
- 1.5 This response has been prepared to address the TDC Officer's comments, to enable them to remove their objection to the proposed development.

2.0 Car Parking – Commercial

- 2.1 The development proposes the retention of 142.2m² commercial (Class E (a-f only)) floorspace at ground floor level, a reduction of 180.8m² compared to the existing Class E floorspace of 323m². Both the existing and proposed Class E floorspace are intended to be car-free.
- 2.2 Class E (a-f) provides a flexible use class which includes the following uses:
- a) *for the display or retail sale of goods, other than hot food, principally to visiting members of the public,*
 - b) *for the sale of food and drink principally to visiting members of the public where consumption of that food and drink is mostly undertaken on the premises,*
 - c) *for the provision of the following kinds of services principally to visiting members of the public*
 - i. *financial services,*
 - ii. *professional services (other than health or medical services), or*
 - iii. *any other services which it is appropriate to provide in a commercial, business or service locality,*
 - d) *for indoor sport, recreation or fitness, not involving motorised vehicles or firearms, principally to visiting members of the public,*

- e) for the provision of medical or health services, principally to visiting members of the public, except the use of premises attached to the residence of the consultant or practitioner,
- f) for a creche, day nursery or day centre, not including a residential use, principally to visiting members of the public.

2.3 In respect of the car parking required for the proposed Class E usage, the TDC Officer stated:

"based on the total proposed commercial floor area of 142.2sqm, on a worst-case scenario of Class E (restaurant/sale of food and drink) which would warrant 1 space per 7.5sqm², 19 spaces would be required".

2.4 However, the TDC Officer has seemingly neglected to consider that the existing site falls under the Use Class E and, as such, could also be occupied as a restaurant, under the worst-case scenario, without recourse to the planning system.

2.5 When considering the existing floor area of 323m², if the existing Class E floorspace was occupied as a restaurant, the site could generate a car parking requirement of 43 spaces at a ratio of 1 space per 7.5sqm. As such, the proposals would lead to a potential reduced requirement of 24 spaces when compared to the existing Class E use established on site.

2.6 Notwithstanding, the site is currently, and will remain car-free. Customers using the Class E area of the site, either in the existing situation or future, would therefore simply park in one of the many car parks in Caversham or in the timed on-street parking bays fronting the site, as is the case for the existing use. Indeed, given the reduction in floorspace as part of the proposals, it is reasonable to assume that pressure on existing car parking areas would reduce because of the proposals, not increase.

2.7 Based on the evidence above, the TDC Officer should be able to confirm that they would have no objection to the Class E element of the proposals being car-free.

3.0 Car Parking – Residential

3.1 The development proposes the construction of three residential dwellings (Use Class C3) on the upper floors of the development. Like the commercial element of the site, these too will operate car-free.

3.2 The TDC Officer has objected to the car-free nature of these dwellings, stating that:

"The residential units would require an additional 3 spaces, a total of 22 spaces would be required which is an increase in demand from the existing use. Therefore, based on the fact that the proposed use would generate a higher parking demand than the existing use, Transport do not support this application [emphasis added]."

3.3 Notably, as referenced in paragraph 2.5, the site could generate a requirement for 43 car parking spaces under its current lawful use and it is therefore refuted that the proposed development would generate a higher parking demand than the existing site use.

3.4 Notwithstanding, the section below provides analysis of the potential for the development to lead to an increase in parking demand on the local highway network from a residential perspective.

Policy

3.5 The TDC Officer quotes three policies from Reading Borough Local Plan (November 2019) as to why the application should be refused – Policy TR1, TR3 and TR5.

3.6 Policy TR1 of the Local Plan states that:

“Proposed development should contribute appropriately to meeting the objectives of the most up-to-date Local Transport Plan or any successor document, including sub-strategies, specific projects identified and the local action plans”.

3.7 Paragraph 4.5.1 of the Local Plan goes on to set out RBC's objectives for Transport, as set out in the Local Transport Plan 2011-2026. The relevant objectives have been tabulated below, along with how the proposed development meets these objectives:

Table 1: LTP Objectives

Objective	Development Compliance with LTP Objectives
To facilitate more physically active travel for journeys in a healthy environment.	The development would be car-free and as such, would promote active travel as the primary mode of travel for site users from the outset.
To ensure that the transport network operates safely and efficiently to meet the needs of all users.	The development would not add additional vehicle movements to the highway network and therefore would result in no change to the efficiency of the local transport network.
To align transport and land use planning to enable sustainable travel choices, improve mobility, reduce the need to travel and preserve the natural environment.	The site is highly accessible by sustainable travel modes and located in a thriving local centre, and therefore reduces the need for future residents to travel excessive distances.
To offer sustainable transport choices for the Travel to Work Area and beyond, integrating within and between different types of transport	The development is located in close proximity to amenities, facilities, workplaces, bus and rail services, allowing for interchange and integration.
To improve journey times, journey time reliability and the availability of information.	The development would not generate additional vehicle movements and therefore would have a neutral impact on journey times across the road network.
To reduce carbon emissions from transport, improve air quality and create a transport network which supports a mobile, affordable low-carbon future	Sustainable modes would be the primary means of travel by site users and therefore carbon emissions would be minimised.

3.8 Policy TR3 of the local plan, states:

“development will only be permitted where... ii) The development would not have a material detrimental impact on the functioning of the transport network; iii) The proposals would not be detrimental to the safety of users of the transport network, including pedestrians and cyclists”.

3.9 Whilst the development could, in theory, result in additional parking pressure on the local highway network, the addition of no more than three cars to the local highway network is considered highly unlikely to result in a 'material detrimental impact' on the function of the highway network or on safety of more vulnerable users of the local transport network.

3.10 Policy TR5 of the Local Plan sets out that:

"Development should provide car parking and cycle parking that is appropriate to the accessibility of locations within the Borough to sustainable transport facilities, particularly public transport".

3.11 With respect to Policy TR5, the site is noted in the Local Plan as being on a 'high frequency' bus route and 1.2km (15-minute walk or 7-minute cycle) from Reading railway station. There are several shops, supermarkets, food and drink establishments, a gym, dentist, doctors and several other amenities less than 400m walk from the site.

3.12 The TDC Officer has not sought to challenge the sustainable and accessible nature of the site. Given the wealth of amenities and sustainable travel options available in close proximity to the site, the applicant considers that a car-free development is appropriate based on its location.

Likely Car Ownership

3.13 Evidence from the 2021 Census¹ for the surrounding area indicates that 35.4% of residents do not own a car. More broadly, across England and Wales, research indicates that only 49% of households in flats have access to a car², with 51% being car-free.

3.14 This of course is a broad statistic that focuses on dwellings of a range of sizes. Given the proposals would be for one and two bed flats and would have no direct car parking availability, it is even more likely that residents of the site would not have a car.

3.15 Nonetheless, as a worst-case, applying a reduction of 35.4% or 51% to the proposed number of flats would only lead to an increase of one or two additional cars as a worst-case scenario, rather than a demand for three cars as stated by the TDC Officer.

Parking Availability

3.16 In respect of parking availability, the TDC Officer states:

"St Annes Road which is in close proximity to the site, currently has no restrictions, therefore there is a potential risk of increased on street parking where parking is already in high demand".

3.17 Most demand for residential parking occurs during the evening and overnight, after residents return from work. As referenced by the TDC Officer in respect of the Class E units, there are time restricted bays (08:00-18:30) on some of the roads surrounding the site, which could be used by customers of the commercial unit during its opening hours.

¹ Dataset: TS045 - Car or van availability. Area: E01016362: Reading 004A. Note: Although the site is just within E01016364: Reading 003A, this area is more residential and suburban in nature, with many larger houses. As such area E01016362: Reading 004A, which includes more flats and closer proximity to facilities is considered a more comparable location for the scale and type of the proposed development.

² <https://www.independent.co.uk/news/uk/london-wales-england-people-berkshire-b2363989.html>

- 3.18 However, outside of the stated hours, there are no restrictions on use of these bays whatsoever and the derestricted times, evenings and overnight, would coincide with peak residential parking demand. Therefore, residents could use these bays during evenings and overnight.
- 3.19 Similar time-restricted bays (09:00-17:30) are available on Priory Avenue and Rectory Road, less than 200m from the site, therefore providing plenty of parking opportunities during evening and overnight periods.
- 3.20 As such, the applicant refutes the TDC Officer's assumption that the development would have an adverse effect on unrestricted parking availability on St Anne's Road, given the very small increase in the number of cars, which would be spread across several residential streets in the vicinity of the site.
- 3.21 In any case, it is considered that the increase in parking demand of one or two cars arising from the proposed development (see paragraph 3.15) and parking on the surrounding roads would not lead to a 'material detrimental impact on the functioning of the transport network' that Policy TR3 of the Local Plan is intended to ensure does not occur.

4.0 Cycle Parking

- 4.1 Cycle parking at the site was proposed in the form of seven semi-vertical racks. Whilst the TDC Officer raised no objection to the number of cycle parking spaces provided (0.5 spaces are required residential unit), they requested that Sheffield stands are provided instead.
- 4.2 As such, the site layout shown on drawing 503001-FCA-00-00-DR-A-P14 rev A shows that the vertical stands have been removed and two Sheffield stands, providing four cycle parking spaces, provided in their place. Cycle parking is therefore compliant with RBC's relevant standards.

5.0 Summary

- 5.1 This document has been prepared in response to comments by Reading Borough Council's Transport Development Control (TDC) Officer, in respect of a proposed mixed-use (Class E(a-f) and Class C3) development at 2-4 Church Road, Caversham, Reading, RG4 7AE.
- 5.2 The TDC Officer has objected to the car-free nature of the development, stating that:
- "based on the fact that the proposed use would generate a higher parking demand than the existing use, Transport do not support this application".*
- 5.3 This response has demonstrated that the proposals would not lead to a higher parking demand than the current site usage and in the unlikely event that off-site parking demand occurs as a result of the new residential units, it would not result in a 'material detrimental impact on the functioning of the transport network' in the context of the relevant policies of the Reading Borough Local Plan.
- 5.4 The vertical cycle parking spaces within the site have been replaced with two Sheffield stands, providing four cycle parking spaces
- 5.5 As such, the proposals are considered compliant with relevant local policies and guidance, and it is considered that the TDC Officer should be able to confirm the removal of their objection to the planning application.