

TECHNICAL NOTE

Job Name: Waterfront Square, Reading

Job No: 332610561

Note No: TN008

Date: October 2025

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Reviewed By: Chris Brice

Subject: Transport Statement Addendum and Response to RBC Highway Comments

1. Introduction

This Technical Note (TN) has been prepared by Stantec UK, on behalf of the Client (Packaged Living Ltd), in connection with the development proposals at Norman Place.

As part of the planning submission, a Transport Statement (TS) was prepared that assessed the impacts of the development pertinent to transport and highways. This TN will serve as a Transport Statement (TS) Addendum, as there have been changes to the development proposals (Ref. PL/24/0958) following ongoing discussions with Reading Borough Council (RBC). Additionally, this TN provides a response to RBC's comments on highways and transport received on June 20, 2025.

2. Transport Statement Addendum

The Transport Statement was initially submitted as part of the outline planning application (Ref. PL/24/0958); following this, there have been ongoing discussions between the Client Team, RBC and statutory consultees.

As a result of these discussions, the development proposals have been altered. **Table 2.1** presents the original and updated development proposals and the differences between them.

Element	Original Dev Proposals	Updated Dev Proposals	Difference
Dwellings	254	236	-18 Dwellings
Commercial Floorspace	268sqm	240sqm	-28sqm

As part of the amended scheme, the western façade of the development has been moved further from Norman Place by 1m, this is in response to engagement with RBC and benefits the width of the proposed footway/cycleway and visibility from to access to the car park to the shared footway/cycleway. The scheme has also improved the public square by increasing its size.

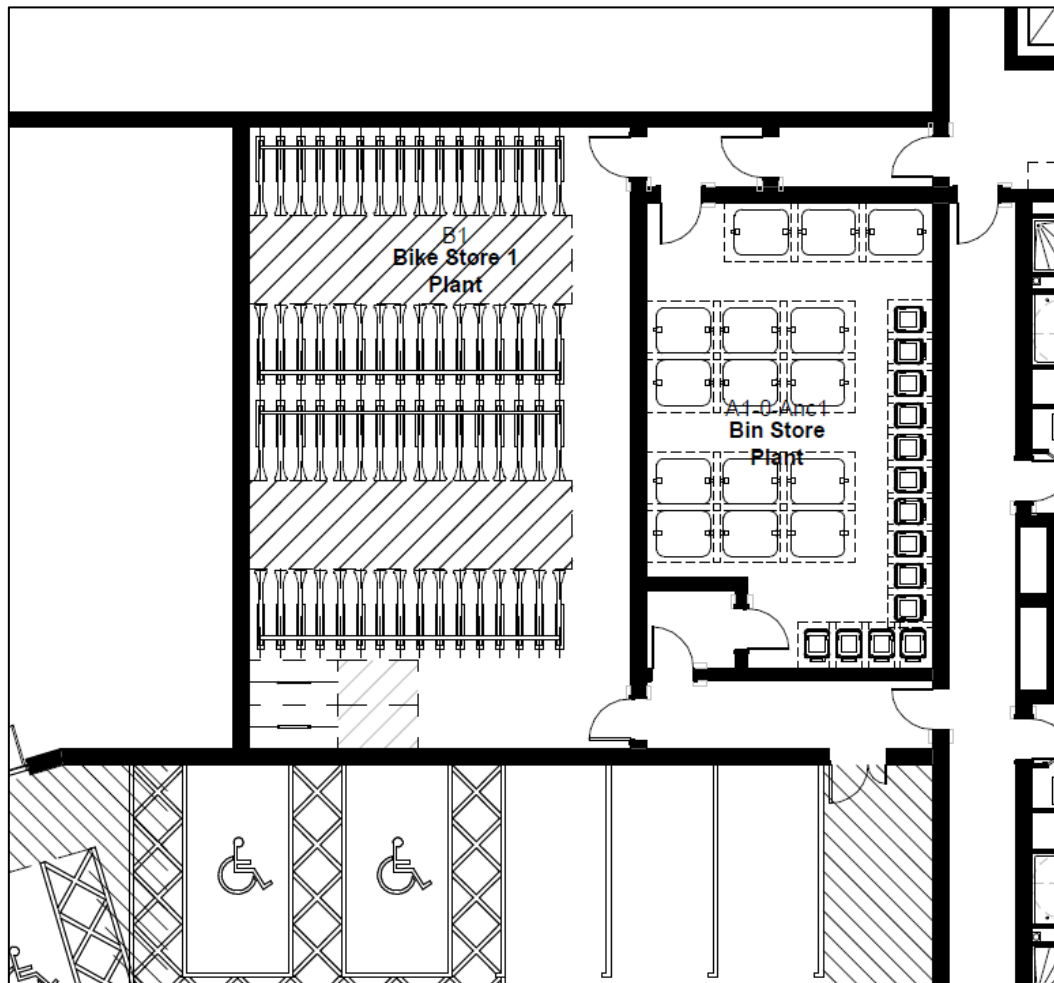
Based on the reduction in development proposals for the number of dwellings and the commercial floorspace, it is considered that the trip generation assessment in the original Transport Statement reflects a robust assessment, and as such, no update to the trip generation has been undertaken.

Cycle parking is proposed to meet the minimum RBC residential requirements:

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Beds	Total	Standards	Required
Studio	22	0.5	11
1 Bed	92	0.5	46
2 Bed	110	0.5	55
3+	12	1	12
			124

Extract from **Drawing 4012-ASA-XX-GF-DR-A-0200** showing the updated cycle storage.



The remainder of this TN covers Stantec's response to ongoing discussions with RBC and highway comments received on June 20, 2025.

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3. Active Travel England (ATE)

3.1. RBC Stated in their comments that:

“Active Travel England have been consulted on this application and they have advised that the application should be assessed utilizing their standing advice notes. The advice notes request that an application is submitted with a completed copy of the ATE Toolkit by the developer, which has not been provided.

It is also evident that the application fails to meet numerous requirements as set out in the standing advice notes, the Highway Authority would therefore advise that the applicant completes and submits the toolkit for review. It should be advised that much of the areas of concern are identified in the remainder of this consultation response and have been identified previously.

One point that has not previously been identified is that the applicant has not undertaken a qualitative assessment of the surrounding pedestrian and cycle routes included how access to local schools and colleges would be accessed through active travel modes. As the applicant is likely to be aware part of the Active Travel advice notes requires an assessment of the actual routes around the site and not just whether the application site is within a sufficient distance to public transport etc.

The applicant has stated that an ATE toolkit is to be submitted separately but this has not yet been received.”

Stantec Response:

A completed ATE Toolkit and a qualitative assessment of the surrounding pedestrian and cycle routes has been provided with this response.

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4. Pedestrian and Cycle Access

4.1. RBC stated in their comments that:

"The proposed scheme proposes cycle parking at the point at which the route from Norman Place meets the Towpath which is NCN Route 5 the cycle stands would create an obstruction especially for cyclists traveling west along the Towpath and turning left towards Norman Place. The adjacent wall and landscaping would also obscure visibility of the Sheffield stands especially when no bicycles are parked in this location. The applicant has advised that a revised landscape strategy drawings are to be submitted but what has been provided does not reflect the comments whilst later in the response it is stated that the updated landscape strategy is still to be submitted. I am therefore currently unable to formally comment on this point."

Stantec Response:

The updated landscaping drawings have been included within the updated submission pack **[A4012E-ASA-XX-00-DR-L-0200]**. Four Sheffield stands have been provided next to the steps from the Towpath, and three have been placed at the front of the building on Vastern Road.

Drawing **332610561-STN-HGN-XX-DR-H-0027** has been provided alongside this response. It shows that cyclists travelling westbound along the towpath will have clear visibility of the Sheffield stands on the Towpath. Landscape Drawing **A4012E-ASA-XX-00-DR-L-0200** shows the levels between the footpath and the public square with a c. 500mm height difference. We therefore do not expect that the landscape edge will impede visibility.

4.2. RBC stated in their comments that:

"It is proposed to provide steps on the northwest corner of the site so that access can be provided to the rear of the site, the landscaped courtyard and commercial use. However, in line with DfT document Inclusive Mobility the proposed scheme has provided no ramp directly adjacent to the steps to allow for a convenient accessible route to this space. An alternative access is provided that is located on Norman Place to the south, which is approximately 40m away from the stepped access, but the Highway Authority do not consider this to be a suitable alternative access for those travelling along the Towpath and as such it had previously been requested that the applicant provide details to explain how this meets the required standards."

Unfortunately, the applicant has only stipulated that the inclusion of a ramp would have a detrimental impact on the landscaping strategy and that access can be gained from Norman Place. However, paragraph 9.2.1 of BS 8300-1:2018 Design of an accessible and inclusive built environment states the following:

Where a ramp is necessary (see 8.1.4), its existence and location should be clearly indicated as a person approaches. If the beginning of the ramp cannot be located close to the accessible entrance, information should be provided at that point to direct users to the correct location. The text should be in large characters, contrasting visually with their background, and be accompanied by the International Symbol for Access.

Should the applicant wish to propose this as the alternative a directional signage drawing would be required which can be dealt with by way of a condition to which the applicant has accepted.

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However, further to previous Highway comments that advised that any route would be obstructed the applicant has stated that an increased refuse collection regime for the residents to twice weekly is now proposed thereby reducing the number of bins left out within the public realm. This ensures that a 2m gap can be maintained between the presented bins and the landscaping to facilitate the safe movement of pedestrians whilst a 4.15m gap is also provided to allow for the passing of a fire tender. These can be seen at Drawing 332610561-STN-HGN-XX-DR-H-0006 P09 and Drawing 332610561-STN-HGN-XX-DR-H-0006B P07. The principle of this is accepted although the applicant has not taken account of the proposed tree within the demarcated collection area with bins illustrated in the same location. Updated drawings are therefore required illustrating the presence of both the bins and tree.

Further to this and for clarification purposes a refuse strategy agreed by the waste team would be required to ensure that the submitted drawing illustrates that the correct number of bins are presented."

Stantec Response:

It is agreed that directional signage will be installed to direct users on the towpath towards the ramped access along Norman Place. It is proposed that this be included in the S106 agreement.

Drawing **332610561-STN-HGN-XX-DR-H-0006 P10** displays that the number of bins can be presented, providing sufficient space for a Fire Tender to pass without interaction with the presented bins. The tree previously within this area has been removed from the proposals.

Drawing **332610561-STN-HGN-XX-DR-H-0006B P08** has been provided with this response, which displays the refuse bins within the collection area, maintaining a 2.0m gap to allow access for those wanting to access the connection through to the river or to the public square.

4.3. RBC stated in their comments that:

"The landscape strategy has identified the provision of two new trees along Vastern Road however it would appear that due to their location near the kerb edge that they may create an obstruction to visibility of the Highway signage along the site frontage. Drawing 332610561-STN-HGN-XX-DR-H-0020 – P03 presents the forward visibility to the signs located on Vastern Road. The applicant has continued to state that 'this shows that the proposed trees would not obscure the navigational signs with the tree canopies controlled/restricted to maintain a clear 2.4m canopy height and narrow tree stem'. However, the applicant appears to have conflated the 2.4m canopy height required for cyclists with the forward visibility requirements for the signage given that any canopy above 2.4m will obstruct the signage.

The Highway Authority refers to Traffic Signs Manual Chapter 1 paragraph 5.2.9 which states:

It is essential that road users have an unobstructed view of traffic signs. The distance which should be kept clear of obstructions to the sight line is known as the clear visibility distance. The higher the prevailing traffic speed, the greater this distance. It is important, therefore, that sight lines are maintained so that vegetation (including seasonal growth), subsequent building development and other features such as shop signs and awnings do not obscure traffic signs. It is equally important to ensure that signs are not placed where they will obstruct the view of other signs and it is essential to ensure that they, themselves, do not obstruct sight lines, e.g. for vehicles emerging from a side road or access.

The Highway Authority also refers to CS 125 Inspection of traffic signs (formerly TD 25/15) Revision 2 paragraph 2.6.3 which states:

Where a traffic sign is mounted on the nearside of the road, the minimum clear visibility distance should be assessed to or from the centre of the nearest lane.

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Based on the above the visibility should not be taken from the centre of the signage but the northern edge to ensure that the full and unobstructed view of the signage and that the visibility is taken to the centre of the nearside lane which would equate to 1.5m and not 1m illustrated.

Further to this it is noted that visibility has been taken from the junction of Norman Place to the road sign and this highlights that half the tree approx. would be an obstruction to the road sign and this would be worsened once the visibility is taken the northern edge of the sign. To overcome this from the day of planting the canopy height would have to be a minimum of 3.5m-4m to ensure that a clear visibility splay can be achieved to the sign.

This will create a demand on the Highway Authority to maintain this visibility and therefore the location of the trees cannot be accepted. Should trees be proposed along the frontage then they will need to be located outside of the visibility for the signage and be fastigate so as to limit future maintenance or the building line would need to be set back so as to provide the trees within the site."

Stantec Response:

Drawing **332610561-STN-HGN-XX-DR-H-0028-P01** displays the vertical visibility of a car and HGV travelling along Vastern Road with the proposed trees, at a 2.7m stem height. As shown, the proposed trees at a stem height of 2.7m do not obstruct the vertical visibility of either a car or a HGV viewing the sign.

4.4. RBC stated in their comments that:

"The DAS identifies the canopy spread to extend up to 8m and would overhang the carriageway creating conflict with vehicles and as such this is not acceptable. The species of the tree would also need to ensure that no branches are provided below 2.4m in height from the point of planting to ensure that no conflicts with cyclists occurs. It has been confirmed by the applicant that the trees at the time of planting will have the required height clearance and that the spread of the tree will be maintained to ensure the spread of the tree will not interfere with Highway safety thereby necessitating them to be pollards and cut back so that they do not overhang the carriageway. Although this had previously been accepted the assessment for the forward visibility identified above now supersedes this advice."

Stantec Response:

The canopy spread of the trees shown on the landscape drawings is illustrated. Proposed trees to be planted alongside the highway will be either fastigated/pollarded so to avoid conflict with the carriageway.

Additionally, comments related to the width of the existing footway/cycleway have been queried due to the proposal of the new tree on Vastern Road (western tree). Consideration to the location of the tree, and associated tree pit has been considered in amongst the existing utilities/services. This has limited the ability for the tree to be moved further to the south. The distance between the tree and the western wall of the steps is 3.3m. We acknowledge this doesn't quite meet the LTN01/20 guidance of 3m + 0.5m vertical clearance of 3.5m. But given the tree is the only point of reduction along this corridor, we believe the presence of a new tree is of merit to the scheme, and there is clear space for pedestrians/cyclists to intermingle around the tree.

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5. Vehicle Access / Servicing

5.1. RBC stated in their comments that:

"Vehicles are to access the proposed undercroft car park from Norman Place in a similar location to the existing car park access and allows for two vehicles to pass on entering/exiting the car park. This was previously deemed acceptable, in response to this revised drawings were submitted, however it had been identified that a give way was proposed as you exit to facilitate movement along the footway / cycleway to which there would be no or very little intervisibility between drivers and pedestrians/cyclists.

The applicant has stated in response to the above that the access is proposed to be amended to a dropped crossing with the internal give way line removed and that the amended access is presented on Drawing 332610561-STN-HGN-XX-DR-H-0007_P03. However, the latest drawing still identifies the bellmouth access with give way line markings where the footway meets the carriageway which is not accepted. "

Stantec Response:

We have reverted to the access being a continuation of the footway/cycleway to support the priority of footway/cycleway uses. Please refer to landscape drawing **A4012E-ASA-XX-00-DR-L-0200**, which shows the removal of the bellmouth.

The amendment to the façade has provided greater space to allow for the required visibility to be achieved between cyclists and vehicles, see Drawing **332610561-STN-HGN-XX-DR-H-0022_P04**

5.2. RBC stated in their comments that:

"As previously advised a visibility splay must be provided prior to the shared pedestrian / cycle facility that is in accordance with the design standards at Sections 5.7 and 5.8 of LTN 1/20. In response to this previous request the applicant has stated the following:

Forward visibility along the proposed shared pedestrian/cycleway is ample for a cyclist to identify when the access shutters are in operation and a vehicle is emerging. Equally the shutter will stop and slow vehicles from egressing. The car park has 19 spaces for residents, resulting in a very low flow of vehicles through the access point. This is coupled with the fact that residents will be familiar with the arrangement, which reduces the risk of a collision, while no visitors will have access to the car park.

Signage will be installed to remind vehicles of the presence of the cycle route when egressing the car park. Given these points we do not believe that there is a significant conflict point at the access between pedestrians, cyclists and vehicles.

However, LTN 1/20 provides no quantitative assessment of what level of traffic or the type of traffic that would require the need for a visibility splay for the cycle route and as such this must be provided.

I would also advise that it is unclear from the submitted drawings that a shutter is in fact proposed but it is assumed that this would be located at the building edge. The Highway Authority would have concern with this given that any vehicle waiting to gain entry would protrude out into the carriageway as well as obstruct the footway/cycleway any entry system would therefore need to be set back 5m from the back of the footway / cycleway. This would also allow for an appropriate key/fob system to be provided that is not located on the Public Highway. The proposed car park entry system would not be accepted unless it complies with the above requirements.

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It should be added that the exiting barrier system is set back between 5.9m and 6.8m from the kerb edge with no footway provided to the north of the existing access and as such the implemented design would have only been required to ensure vehicles do not protrude into the carriageway. Given that the footway/cycleway is now extending across the access the design must ensure that no conflict exists between pedestrians and cyclists and vehicles awaiting entry.

The design at present contradicts comments made by the applicant and does not accord with Policy or design standards and is therefore unacceptable to the Highway Authority."

Stantec Response:

Drawing **332610561-STN-HGN-XX-DR-H-0022_P04** shows the location of the shutter. It is proposed that the shutter be fast opening and linked to an ANPR/detection system so that as vehicles enter Norman Place, the shutter opens before vehicles are required to wait and block the footway/cycleway. This prevents the need for an alcove that could cause an area for anti-social concern. Recommend that details of the control system can be conditioned.

5.3. RBC stated in their comments that:

"Two further access points are proposed as an in and out for service vehicles and the principle of this is accepted. Tracking has been submitted that identifies a 7.5t panel van service vehicle entering and exiting the layby from either direction and visibility provided to demonstrate there would be no Highway safety issue with the layout. These have been illustrated on drawings 332610561-STN-HGN-XX-DR-H-0006 P04A and 332610561-STN-HGN-XX-DR-H-0012 which are deemed acceptable. A further drawing has been submitted by the applicant drawing 332610561-STN-HGN-XX-DR-H-0023 Rev P02 which illustrates a 10m rigid entering and exiting the layby and this is deemed acceptable in principle but as per the 7.5t panel van the tracking should be illustrated for both directions and therefore a further drawing is required."

Stantec Response:

Drawing **332610561-STN-HGN-XX-DR-H-0023A - P03** has been provided, which displays a 10m rigid entrance and exit in both directions.

5.4. RBC stated in their comments that:

"The applicant has stated that articulated vehicles will not be needed to service the commercial unit and that to prevent this a condition could be included in the tenancy agreement with the tenant to prevent servicing at this location by an articulated HGV. As previously stated the applicant has provided no evidence to support this claim and the Planning Authority would have no way to enforce the restriction of no articulated vehicles. As such the application should be assessed based on evidence of how these units would usually be served and if that includes articulated vehicles this should be included within the submission."

Stantec Response:

TfL Kerbside Loading Guidance January 2017, Section 5, Page 9, presents a table which states the most common vehicle type used depending on the land use, for A1 – Retail-Food is LGV, with most other land uses also being an LGV, while some have it as an OGV1 as tracked in Drawing **332610561-STN-HGN-XX-DR-H-0023A - P03**, none of the land uses have an articulated as being commonly used.

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5.5. RBC stated in their comments that:

“Refuse is to be relocated to a collection point on Norman Place which doubles up as the layby however this would result in the lay by being unavailable for deliveries which the trip rate data identifies as being a constant occurrence throughout the day. The applicant has updated the TRICS data which has identified a reduced amount of servicing than previously reported however this still equates to the bay being in use for an average of 31 minutes every hour during the day. The Highway Authority would only be able to accept this dual use should a refuse collection management plan be submitted that identifies the expected time the refuse is to be collected, and a timeframe specified for when the bins will be taken out to the collection area and then back to the stores that minimizes the use of that area. The Highway Authority would be happy for this to be dealt with by way of a condition

Irrespective of the above the location of the bin collection point provides not just an unattractive route to the landscaped courtyard but also an unattractive outlook for the residential units along that elevation as well as creating pinch points for pedestrians. The applicant has stated that the pinch point would equate to 2m for the accessible route to the north and 4.16m between the bins and the residential block to the east. As stated previously in this response the applicant has provided a bin collection layout that conflicts with the tree and therefore this must be reviewed and the design of the landscaping along the building line should be assessed to confirm whether the measurements should be taken to the building line or the edge of the landscaping

The Highway Authority would however stress that the loading area depicted by the blue area on the plan is the extent to which the bins will be located, and it is far more likely that the management team would overload the nearest location than the furthest and so the bins would be positioned in a way that creates an obstruction. This would be further exacerbated by the requirement for the accessible route as detailed above given that this would reduce the area further.

The shape of the refuse collection area should therefore be revised to ensure a 2m clearance at the narrowest point, the drawing updated to include all the bins within that area and details provided as to how it will be demarcated/enclosed to ensure the bins do not spill out creating an obstruction.”

Stantec Response:

It is agreed that the refuse collection management plan will be handled via a condition. This will include residential (RBC) and commercial (private contractor) collections, both of which will occur twice weekly, as well as further matters relating to the collection of waste from the proposed development.

The measurements are to be taken from the building line, as the landscape is flush with the surface and does not create a conflict.

The collection area will be demarcated using different coloured/sized paving or paint to provide an area for the bins to be presented.

Drawing **332610561-STN-HGN-XX-DR-H-0006B P08** has been provided with this response, which displays the refuse bins within the collection area, north of the bins, a 2.0m gap is maintained to allow access for those wanting to access the ramp, with a 4.20m gap maintained between the building and the presented bins.

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6. Parking

6.1. RBC stated in their comments that:

“Cycle parking for the commercial uses has been provided by way of external Sheffield stands which is accepted in principle for visitors however the applicant has provided conflicting information within the response. At paragraph 3.5 of the response it states:

The updated landscaping drawings have been included in this response. Three Sheffield stands have been relocated to the east along the Towpath, and one to the front of the building on Vastern Road.

However, drawing A4012E-ASA-XX-00-DR-L-0200 Rev P2 does not illustrate this and so it is assumed that this is not the latest version of the drawing. Whilst at paragraph 5.2 it states:

An updated Landscaping plan for the position of the relocated Sheffield Stands will be provided.

As previously explained given that there are numerous competing requirements within the external space this should be submitted for review and agreed at the application stage. In addition, staff cycle parking should be provided within a covered and secure cycle store, the applicant has stated that this can be dealt with by way of a condition however given that this would be located within the building and require direct access on to the landscaped area this should be agreed at the application stage. ”

Stantec Response:

This response includes an updated Landscaping plan **A4012E-ASA-XX-00-DR-L-0200** showing the Sheffield Stands position as discussed previously.

Drawing A4012-ASA-XX-GF-DR-A-0200 shows the ability for staff cycle parking to be located within the commercial unit, this is shown as 3 stands for 6 bikes.

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7. Fire Access

7.1. RBC stated in their comments that:

"The Highway Authority has reviewed the submitted Fire Strategy, and it is noted that an updated tracking plan has been submitted for a standard fire appliance as well as acknowledged that the provision of the larger fire tender vehicle would not be required.

In addition, it is noted that the Fire Strategy advises that the access route for a fire appliance would be clear and unobstructed however, this is not the case given that the space could be obstructed by a delivery vehicle. The applicant has stated in response that it should be noted this is a loading bay, not a parking bay and will be restricted to waiting only by the facilities team. As such, the vehicle will not be unattended with the driver available to move the vehicle in the event of a fire. The Highway Authority does not agree with that view given that the loading facility is located along the western elevation and the main residential entrance is to the south and the commercial entrance to the north with additional residential entrances at ground floor level provided along the eastern elevation.

There is therefore more than a possibility that a driver of a vehicle will not be at the vehicle whilst a delivery takes place resulting in the vehicle creating an obstruction in the event of a fire.

Norman Place itself is subject to its own restrictions and only allows for loading and unloading and therefore should maintenance work be required to the building or a larger delivery whereby longer-term parking would be required the only location would be within the specified loading area. The applicant has not taken all eventualities into account and therefore this must be assessed."

Stantec Response:

The access route will be available for the fire tender, and the likelihood of a fire occurring simultaneously when the area is occupied by bins/vehicles would be considered unlikely. That being said, there is a low risk of this occurring, and it can be managed by on-site management, which will be present during such operations (e.g., bin removal), to prevent the fire service from being unable to use the road.

In the event of a fire, the service vehicle driver would exit the building and return to their vehicle, which they can simply move to the turning head on Norman Place, removing any obstruction before a fire tender arrives.

The Fire Consultant have not deemed this as being a concern given the low risk of this occurring and that drivers can move their vehicles should an incident occur.

7.2. RBC stated in their comments that:

"It has also been stated that the Fire Strategy has been updated to reflect the applicants' comments, but this has not been submitted for review.

In addition to the above it is noted that the tracking of the fire appliance comes within 150mm of the proposed tree and as such the tree should be relocated so that it is at least 450mm from the tracking route to ensure suitable clearance. This does not mean that the vehicle will not come into conflict with branches etc and therefore tree may need to be relocated further or the species reviewed to ensure long term damage to the tree does not occur.

To the south of this tree confirmation as to what landscaping is proposed and how it is demarcated must be provided given that an over sail does occur, should this be flush / low level planting / kerb that would not create any conflict but the drawing would seem to imply a structure of some kind."

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Stantec Response:

Landscaping plan **A4012E-ASA-XX-00-DR-L-0200** identifies where flush, standard kerbs are located to enable a better understanding of the line work used to inform the tracking. The fire tender drawing has been updated and shown on Drawing **332610561-STN-HGN-XX-DR-H-0021**, it can be seen that this does not conflict with landscaping features. All tree canopies that intersect with the fire tender are to have canopy clearance of 3.7m.

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8. Highway Works

8.1. RBC stated in their response that:

"The proposed development results in the provision of a new / widened footway / cycleway along the western boundary of the site between Vastern Road and the Towpath, this route already partly within the adoptable Highway extent and as such the proposed improvements should all be adopted. This should include the full opening at the northern boundary with the Towpath. The proposal proposes further improvements along the Towpath which is also Public Highway.

The extent of all the Highway works should be illustrated on a dedicated plan(s) to be included within any S106 Agreement.

The applicant has stated that all the highway works have been illustrated on drawing 332610561-STN-HGN-XX-DR-H-0025B Rev P02 however, this drawing has not been included within the submission."

Stantec Response:

Drawing **332610561-STN-HGN-XX-DR-H-0025B Rev P02** has been included with this response.