

Memo

From: Transport Development Control
To: Jonathan Markwell
Date: 20th March 2026
Re: Consultation on Planning Application

Planning Application Ref: PL/25/1706

Officer: Jonathan Markwell

Application Type: Outline planning permission: Some matters reserved

Address: Forbury Retail Park, Kenavon Drive, Reading, RG1 3HS

Proposal: Outline application with all matters reserved with the exception of access, for site redevelopment involving the demolition of all existing structures & a residential-led mixed use proposal for up to 700 residential units (Class C3) & up to 3,000 sqm (GEA) of commercial uses (Class E), together with various associated works including replacement pedestrian and vehicle access routes, open spaces, hard & soft landscaping & sewer works, partial basement excavation, up to 130 basement level car parking spaces, up to 53 separate car parking spaces for Class E uses, up to 600 cycle parking spaces & servicing facilities. This application is accompanied by an Environmental Statement.

Recent Planning History

Planning application ref. 230822 was submitted on 8th June 2023 for a residential-led mixed use proposal for up to 820 residential units (Class C3) & up to 5,500 sqm (GEA) of commercial uses (Class E) - Application disposed and not determined.

This application is submitted as a new Outline Planning Application and seeks to build on the progress made on the previous application. The Outline Planning Application is for residential-led mixed use proposal for up to 700 residential units (Class C3) & up to 3,000 sqm (GEA) of commercial uses (Class E), with all matters reserved aside from access.

In summary the Proposed Development comprises:

- Demolition of the existing buildings and structures on Site.
- Construction of new buildings to provide up to 700 residential units; and up to 3,000 sqm of flexible Class E floorspace.
- Up to 130 parking spaces associated with the residential aspect of the development, all of which are to be located at basement level, and 53 parking spaces at ground level for the commercial uses.
- Delivery of 600 cycle parking spaces,
- Diversion of the existing sewer running through the Site
- Ancillary and associated works including public realm creation, landscaping, utilities and surface water drainage, plant and equipment

Comparison Table of the previously submitted outline application against the amended application (PL251706)

Table 1.0 Summary of Amendments to the Scheme (maxima)

	Previously Submitted	Amended Application	Change
Residential Unit Numbers	820	700	-110
Commercial Floor Area	5,500	3,000	-2,500 sqm
Car Parking Spaces	200	130	-70
Cycle Parking Spaces	820	600	-220

The Class E floorspace has been reduced by 2,500sqm GEA and, the amended scheme now limits this space to complementary retail or community uses. It is stated that the applicant agrees to a condition restricting the permitted Class E sub-classes as set out in Table 6.1 of the Transport Assessment. The revised scheme keeps a single large Class E unit with customer parking at the western block and reduces and relocates the remaining Class E floorspace into smaller units within the eastern blocks.

Table 6.1: Proposed Control of Class E Land Use

Class E Land Use	Included or excluded by Condition
E(a) Display or retail sale of goods, other than hot food	Included
E(b) Sale of food and drink for consumption (mostly) on the premises	Included
E(c) Provision of: E(c)(i) Financial services, E(c)(ii) Professional services (other than health or medical services), or E(c)(iii) Other appropriate services in a commercial, business or service locality	Included
E(d) Indoor sport, recreation or fitness (not involving motorised vehicles or firearms or use as a swimming pool or skating rink)	Excluded
E(e) Provision of medical or health services (except the use of premises attached to the residence of the consultant or practitioner)	Excluded
E(f) Creche, day nursery or day centre (not including a residential use)	Excluded
E(g) Uses which can be carried out in a residential area without detriment to its amenity: E(g)(i) Offices to carry out any operational or administrative functions, E(g)(ii) Research and development of products or processes E(g)(iii) Industrial processes	Excluded

Existing Site

The existing Retail Park site comprises 9,700sqm of large-scale retail units (predominantly furniture stores), a 390sqm drive-thru restaurant (Kentucky Fried

Chicken, KFC), a car parking area and a servicing loop around the rear of the units. The site has two access points, both located along the southern boundary of the site, one on Forbury Road, a left-in, left-out, and an in-only on Kenavon Drive.

The existing retail units are serviced along the northern boundary of the site with a servicing loop provided around the rear, which is accessed through the Kenavon Drive access, and the egressed at the Forbury Road access. The KFC unit is serviced via the adjacent parking area.

The site is subject to several covenants to provide a right of access to key infrastructure, which is located either within or adjacent to the site. These are as follows:

- **Network Rail** - Current right of access through the site to the gated trackside compound located at the site's northeast corner. The covenant specifies that Network Rail has a right of access to the servicing loop around the rear of the units and could therefore be accessed via either Forbury Road or Kenavon Drive;

- **SSE** - Existing substation located at the site's northeast corner, which has the right of access for maintenance vehicles to access and park. The covenant specifies there is a right of access to the servicing loop around the rear of the units and could therefore be accessed via either Forbury Road or Kenavon Drive; and

- **Thames Water** - A sewer runs below the existing car park area, which will be diverted to the north of the site as part of the proposals. Thames Water has a right of access to undertake maintenance. This can be accessed via either the Forbury Road or Kenavon Drive access, depending on the location of the required maintenance.

Location and Accessibility

Pedestrian

The site is situated on the edge of Reading Town Centre in an area that help encourage walking by residents due to employment centres in the area. Within a 20-minute walk, residents can access the whole of Reading Town Centre, including Broad Street Mall and The Oracle areas, as well as Caversham and transport nodes such as Reading Railway Station and multiple town centre bus stops.

In relation to walking distances, the applicant has stated that there are several schools and employment areas, such as Thames Valley Park, Reading Berkshire Hospital and the University of Reading, which are just beyond the 20-minute walking distance.

Footways are provided on both sides of Forbury Road and Kenavon Drive; these lead to the extensive network within the town centre and along both the River Kennet

and Thames. The Napier Road underpass runs under the railway to the north of the site, reducing severance between the two sides of the railway; access to this from the site is provided along a footpath along the site's eastern edge.

The Huntley Wharf development contributed to the improvement of the informal crossing on the Kenavon Drive arm of the Forbury Road / Kenavon Drive roundabout. The improvements have been completed, including the provision of tactile paving and the widening of the central island. One hundred metres west of the western entrance is a staggered pelican crossing with a central island and tactile paving to allow passage across Forbury Road.

The Design Code for movement and access are set out in Section 4 of the Design Code. A new crossing facility is proposed on Kenavon Drive to the east of the site which provides a new crossing provision connecting the site via Huntley Wharf to the routes along the canal. This is included in Appendix G of the TA - Drawing no. 50582-STN-HGN-SW-DR-CH-0010 Rev P03

The Illustrative Pedestrian Movement Diagram in Section 4 of the Design Code (below) identifies a secondary route on the western arm of the Forbury Road / Kenavon Drive roundabout. However, the dual carriageway layout creates fast, continuous vehicle flows and poor visibility across multiple lanes, leaving pedestrians feeling exposed and unsafe crossing in this location. Where a dual carriageway lacks a formal pedestrian crossing, it creates a significant severance barrier, making the route feel unsafe and discouraging walking and cycling.



The Transport Assessment asserts in paragraph 6.7.1 that the possibility of additional pedestrian crossings across Forbury Road was investigated but it was concluded that there was no justification or need for further crossings given the existing crossings on Forbury Road. However, no evidence has been submitted by the applicant to justify why a formal crossing cannot be provided in this location.

It is the Highway Authority's view that improvements should be made to the western arm of the Forbury Road/Kenavon Drive roundabout to improve crossing facilities on

the desire line for those accessing bus stops on Kings Road or other key destinations to the east of the town centre. This is supported by the response from Active Travel England states “ATE requests improvements to the western leg of the Forbury Road/Kenavon Drive roundabout to improve walking routes to the bus stop on Forbury Road. It is noted that this crossing is uncontrolled, has multiple wide lanes and lacks tactile paving. This position is supported by the LHA. A controlled crossing here would be preferable to cater for the desire line towards the bus stops and access to Kings Road”.

Given that any required pedestrian crossings would need to be secured through a S106 Agreement, the feasibility of delivering a formal crossing in this location must be fully assessed as part of the application, and where appropriate, its provision should be secured through the planning process.

Cycling

The site is situated on the edge of Reading town centre with a Town Centre Cycle Route concluding at the western boundary of the application site. This cycle route provides wider access to the cycle routes in the town, ultimately connecting to National Cycle Network’s NCN 4, which runs along the River Kennet, providing a route to the South of Reading and Sonning and NCN 5, which runs along the River Thames to the north of the site and into Caversham. These routes connect to the extended cycle network of Reading, which consists of a mixture of traffic-free cycle routes and on-road cycle routes. This network connects the site to Reading Town centre and key destinations, including Reading Railway Station.

The site’s location means that within a 20-minute cycle, the site can access Caversham, Sonning, Whitley Wood, Woodley, and the employment centre within Reading. Multiple different types of schools are within the 20-minute cycling distance, including primary, secondary, grammar and the University of Reading. Major employment centres are also included within this 20-minute radius, including the Royal Berkshire Hospital, Thames Valley Park, Green Park and Winnersh Triangle.

The design codes for movement and access are set out in Section 4 of the Design Code. However, it is noted that the Design Code (Section 4.1) does not make reference to either LTN 1/20 and/or Gear Change which should be complied with to ensure that the proposed cycle routes within the site and connections onto the surrounding network are to the required standards. The Design Code should be updated to reflect this.

The application includes a cycle route that runs along the site's internal southern edge. The cycle path will route between the east and west site accesses, with improvements to the western access point to allow pedestrians and cyclists to access the site. It is stated that one TPO tree will have to be removed to facilitate the indicative cycle route and changes to the eastern access junction. Drawing 50582-STN-HGN-SW-DR-CH-0011-P02 in Appendix C of the Transport Assessment illustrates how the indicative cycle route could be delivered in accordance with the Parameter Plans.

However, LTN 1/20 establishes that a two-way cycle track should generally be at least 3.0 m wide. This width must be increased where flows are high or where there are vertical obstructions (such as walls, fences, railings, tree lines, or other fixed features), as additional space is required to maintain safe passing distances and avoid conflict. Therefore, the proposed design does not comply with these requirements.

Further, the cycle path terminates before it reaches the eastern access road with no safe transition between the proposed off carriageway cycle facility and the on-carriageway cycle route on Kenavon Drive. The indicative cycle route connection onto the eastern access road creates confusion and forces cyclists to merge into traffic unexpectedly. Therefore, the cycle path should be extended across the access road to meet the on-carriageway cycle route to provide a clear, continuous connection and establish safe priority across the access road. A compliant raised table design would provide a continuous surface to indicate cycle and pedestrian priority while reducing vehicle speeds and improving safety. The cycle route would need to be part of the detailed design as this would form part of the full element of the planning application as access is a material consideration. The Highway Authority requests that revised plans are submitted illustrating a 3m (plus clearance) continuous cycle link across the eastern access road with an appropriate transition onto the on-carriageway cycle route in accordance with LTN 1/20. Visibility splays should also be illustrated to ensure cyclists have a clear line of vision before crossing the eastern access road without being impacted by trees or vegetation.

The Highway Authority has reviewed the observations provided by Active Travel England regarding cycling infrastructure in the vicinity of the site. It is noted that the principal route connecting the site to the train station contains sections of constrained width, which create potential conflict between pedestrians and cyclists. Furthermore, there is currently no safe or continuous cycle route to the south providing a crossing over the River Kennet.

Given that the proposed development is expected to increase both pedestrian and cycle movements in the surrounding area, the applicant is requested to propose appropriate improvements to the local cycling network. These should specifically address the issues highlighted by Active Travel England and be designed in accordance with the principles and standards set out in LTN 1/20.

Public Transport

Kings Meadow View is within a short distance of strategic bus routes that connect the site with destinations across Reading Borough and beyond. There are bus stops within walking distance of 650m, including those on Blagrove Street, Forbury Road, Kenavon Drive, Kings Road and Station Road. These services provide access to the wider region, including Bracknell, Newbury and Wokingham.

The development is also close to the Reading Railway Station, a national transport hub. Reading Railway Station is used by approximately 17 million passengers annually (2019) and is the ninth busiest station outside London and the second busiest interchange station outside of London. Rail services from Reading Station

provide frequent regional and national connections, with Great Western Railway offering routes to London Paddington, Oxford, Bristol and the South West; CrossCountry providing long-distance services to Birmingham, the North and Scotland; and South Western Railway linking Reading with London Waterloo, Wokingham, Staines and destinations across Hampshire and the South Coast.

Reading Railway Station is the western terminus for the Elizabeth line (Crossrail) services. The service opened its full route in November of 2022, providing four trains per hour during peak hours. The route connects to railway stations and key interchanges in central and east London, including Bond Street, Farringdon, and Canary Wharf.

Overall, it is accepted by the Highway Authority that the site is located within close proximity to sufficient public transport provisions.

Vehicular Access

The proposals include two vehicular access points, one on Forbury Road, the western access point, and another on Kenavon Drive, the eastern access point.

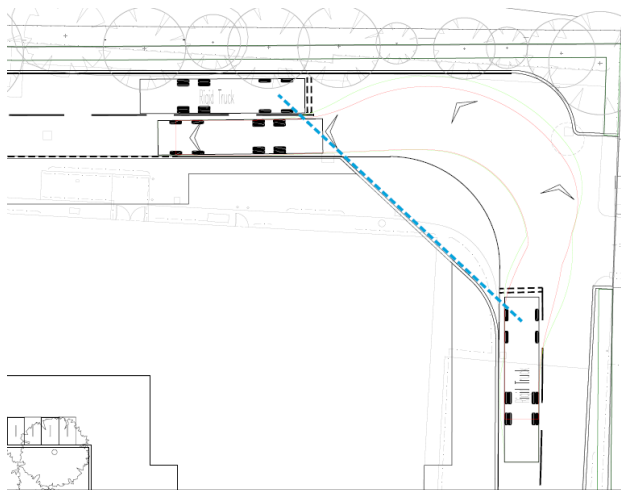
The western access point will remain a left-in and out junction, with the width of the bell mouth being reduced (in line with RBC comments to the previous scheme), and provided with improved crossing facilities. The 130 space residential basement car park is accessed through the western access point along with the 53 space at-grade commercial car park. This is shown in the outline planning application parameter plan, 'Parameter Plan 14 - Proposed Servicing & Access, ref. 18111-SQP-ZZ-GF-DR-A-PL00014'.

The eastern access point is proposed to be modified from an entry-only junction to an entry and exit access point, providing access to the service road along the Site's eastern and northern edges. The proposed access width has been increased to allow for two-way vehicle movements, as shown in Appendix F. The bellmouth width of the access junction has been widened to 8.5m and the radii of the junction increased. The ability to undertake widening of the access junction to the east is constrained by existing underground HV cables in the eastern verge that serve the sub station and are subject to a restrictive covenant. As such, the access has been widened solely to the west which will impact the TPO trees on the frontage.

Visibility splays of 2.4m x 43m in both directions should be provided as the eastern access is now to be utilised as an entrance and exit whereby it has previously been utilised as an entrance only. The Highway Authority requests that the visibility splays are submitted for review.

The western portion of the Site will include a new food store. The Design Code (Section 5.3 Links and Connections) identifies that a 6m roadway and 2m footway service route will be provided from the eastern access point, along the service road to the rear of the commercial unit, where there will be a servicing area. The submitted swept-path analysis demonstrates manoeuvrability for a 12 m rigid vehicle

with the intervisibility sight line shown by the blue dashed line. The intervisibility sight line will ensure that drivers on the internal road can see approaching vehicles. However, it appears from the tracking drawings that the give way line on the approach to the bend could be set back further to ensure vehicles waiting to enter the site do not conflict with vehicles exiting the site. Alternatively, the kerb line geometry could be amended to reduce the need for drivers to swing widely into opposing lanes or conflict areas.



There is also a secondary service route (Green Service Route) which will provide a servicing route for smaller commercial units within the eastern blocks. Tracking drawings have been submitted within Appendix D of the TA.

Further clarification is requested regarding how day-to-day deliveries to the residential blocks—such as food delivery services, small parcel couriers, or taxis—are intended to operate. These types of deliveries typically seek to stop as close as possible to the building entrance. However, it is not clear from the Design Code or the Parameter Plans (including Parameter Plan 14 - Proposed Servicing and Access) how such short-stay, ad-hoc deliveries are to be routed within the development.

Waste Strategy

The Design Code states that a detailed waste management strategy is to be addressed within the subsequent RMA, and that refuse storage for all residential blocks should be provided at basement level. However, the Design Code does not clearly identify the servicing routes for deliveries or waste collection associated with these residential blocks.

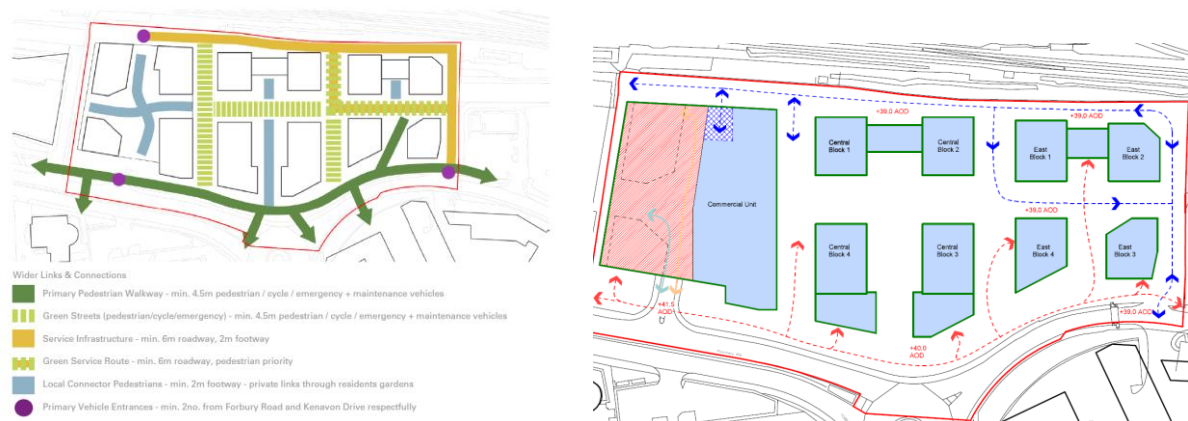
The Transport Assessment (paras. 6.3.8-6.3.9) notes that, when required, servicing vehicles may enter the public realm to service the southern row of blocks, under management by the Estate Management Team. Nonetheless, the information provided within the Design Code, parameter plans and the supporting Waste Strategy document is insufficient to establish how servicing access will operate across the full extent of the residential development.

The Waste Strategy document states that residential collections will be undertaken from a designated collection point and returned to the bin store area after collection. However, access for refuse collection vehicles (RCV) should be considered at the outline stage as this will impact on the design of the streets and the layout of the buildings. Further clarity and confirmed routing arrangements are therefore required to ensure that servicing can be safely and acceptably accommodated without compromising the functionality of the public realm. The pedestrian and cycling links must not be compromised by adjacent functions such as servicing, and appropriate serving/delivery bays must be identified within the Design Codes document.

Emergency access is permitted via both vehicular accesses, with the commercial section provided through the western access point and the residential section provided through the eastern access. It is stated that emergency vehicles will access the development via the internal paths within the site to minimise the distance between the emergency vehicles and the residential tower blocks. This is deemed acceptable in principle however full swept path analysis will be required at the reserved matters stage to determine the footpath widths required. However, clarification is sought regarding how general vehicles would be prevented from using these internal paths for convenience or how deliveries would be made to the residential units given that delivery vehicles would attempt to get as close as possible for deliveries to the residential units.

Discrepancies within the Design Code and Parameter Plans

The Design Code sets out a clear hierarchy of vehicle, cycle, and pedestrian routes linking the site with Reading Town Centre and surrounding areas. It is indicated that the servicing route will be located to the north and a series of Green Streets will be provided within the site for pedestrian/cycle/emergency/maintenance movement only.



The Green Streets will provide access for pedestrian/cycle/emergency access. However, given that these routes are to be 4.5m in width, there is no indication of any access control to prevent general vehicle traffic from abusing the internal routes.

The diagram for the eastern square illustrates the vehicular and service route with a minimum width of 6m + 2m footway. However, this conflicts with the diagram in 5.2.7 which indicates that this route is a primary route for cycle/pedestrian/emergency and maintenance route with a width of 4.5m (opposed to 6m + 2m footway). The diagram in 5.2.4 also indicates that the service route (routed around the eastern square) is two-way (as indicated by the directional arrows).

5.2.4 Eastern Square



5.2.7 Green Streets



The diagram in 5.2.4 indicates that the eastern square will function as a primary pedestrian/cycle route, while also accommodating a service access route. However, it is not clear how both functions will operate within the same space without compromising pedestrian/cycling safety and servicing requirements.

Section 6.3 sets out the separation distances between blocks; however, the Design Code must go further to guarantee that the specified minimum widths for all key movement and landscape corridors, including service routes, primary pedestrian/cycle routes, and landscaped spaces, can be successfully delivered without compromising their intended functions. There appears to be inconsistencies within the Design Codes regarding the allocation and widths of some of the routes within the site which needs to be clarified.

The Design Code (Section 5.2.5) identifies a stepped access connecting the Western Courtyard to the Green Streets (between Blocks WB2/WB3 and CB1/CB2), which would not provide an inclusive or accessible route. The reliance on steps at this location creates a barrier for wheelchair users, people with limited mobility, pushchairs, and those who rely on level or gently graded paths. Therefore, an alternative level or ramped route must be provided.

The Design Code states that the cycle stores associated with Blocks WB1, WB2, WB3, and WB4 will be provided at ground-floor level with direct access to street level. However, it is unclear whether these facilities will be conveniently located for all residents, particularly for those in the blocks that are more remote from the proposed store entrances. To ensure the cycle parking provided is appropriate, accessible, and convenient, the Design Code should be updated should make reference to the standards and principles set out in LTN 1/20 to ensure that the cycle parking provided is compliant with national guidance and fully supports active travel within the development.

The Design Code (Section 6.9) states that servicing for Blocks WB3 and WB4 should be accessed from the south. However, no servicing access/route is illustrated to the south on the Parameter Plan 14 - Proposed Servicing and Access.

The Design Code states that servicing for Block CB4 should be accessed from basement level below the plot. However, no servicing access/route is illustrated into Plot CB4 on the Parameter Plan 14 - Proposed Servicing and Access.

The Design Code states that servicing for Blocks EB1 and EB2 should be accessed from the servicing route to the north with servicing entrances to be located along the northern elevation of the buildings. Whilst the Design Code (Section 5.3 Links and Connections) identifies that a 6m roadway and 2m footway service route will be provided to the north, it does not indicate that any service area/delivery bay will be located along the service route for these blocks. There are concerns that the service route will be blocked by delivery/service vehicles accessing these blocks.

The Design Code states that servicing for Block EB3 should be accessed from the east. However, the design code does not indicate that any service area/delivery bay will be located along the service route. There are concerns that the service route will be blocked by delivery/service vehicles accessing this block.

The Design Code should ensure that all Blocks are provided with designated servicing areas/bay to prevent service routes and pedestrian/cycling route from being obstructed. The Design Code should therefore be updated to secure this requirement across all blocks with causing any obstructions along the servicing route (as identified on the Parameter Plan 14).

In addition, all residential blocks should be provided with refuse stores at ground-floor level, with direct and convenient access to street level, to enable servicing to take place safely and efficiently. Ground-floor refuse stores are essential to avoid reliance on internal lifts or extended carry distances, and to ensure that collection crews can access bins without entering residential circulation spaces.

Trip Generation

The trip generation assessment for the existing Forbury Retail Park has been completed via surveys conducted on a weekday (26th June 2025) and a Saturday (28th June 2025) at Forbury Road and Kenavon Drive access points. This has been done to obtain a baseline against which the proposed development can be compared. Table 7.1 in the TA presents the vehicle trip generation (excluding servicing vehicles).

The likely trip generation associated with the proposed development has been estimated by deriving trip rates from comparable survey sites extracted from TRICS which is a nationally agreed methodology and is therefore accepted by the Highway Authority.

In respect of the residential element, four survey sites were extracted from TRICs for Private Flats for the weekday assessment (all of which were included in the previous application TRICS sites). The selected sites have a greater parking provision than the proposed development, however, there are no sites comparable to the parking ratio proposed; as such, this is considered as a worst-case scenario. The trip rates and generation are shown in Table 7.2.

The applicant has assessed the proposed commercial floor space as a retail discount food store. It is noted that the ground floor footprints do include smaller Class E units on the ground floor of the eastern blocks (EB1, EB2, EB3 & E4). However, as these are small scale units, I am happy for the total commercial floorspace to be assessed as a whole. The applicant agrees to a condition restricting the permitted Class E sub-classes as set out in Table 6.1 of the Transport Assessment, therefore, I am satisfied that the assessment has been undertaken on a worst case scenario based on the proposed commercial uses.

The total person trip generation associated with the proposed development (residential and commercial floorspace) is presented in **Table 7.4**.

Table 7.4: Total People Trips for Proposed Development

Time Period	Person Trips		
	Arrive	Depart	Two-Way
AM Peak (08:00 – 09:00)	180	277	456
PM Peak (17:00 – 18:00)	375	330	706
Daily (07:00 – 19:00)	3,250	3,278	6,528

The applicant contends that a significant proportion of movements will be wholly internal, with residents travelling directly between their homes and the on-site store. On this basis, an internalisation rate of 35% has been adopted. However, no evidence in the form of benchmarking against comparable mixed-use schemes or TRICS-based internalisation analyses has been submitted for review.

The Highway Authority requires the applicant to submit robust evidence to justify the proposed 35% internalisation rate, which is considered significantly optimistic for a development of this scale. While it is accepted that some residents will utilise the on-site food store for occasional top-up shopping, this alone does not substantiate such a high internalisation assumption for a scheme comprising up to 700 dwellings and circa 3,000 sqm of retail floorspace.

In the absence of robust supporting evidence, the Highway Authority cannot accept the proposed rate. The current submission provides no justification, and therefore the internalisation assumption must be treated as unreliable for the purposes of assessing trip generation.

Further clarification is required in relation to Table 7.5, which presents the internal and external person trip generation. It is not evident how the stated internalisation rate has been applied to the trip figures presented in Table 7.4. The methodology

used to derive the values presented in Table 7.5 is unclear based on the information provided.

Table 7.6 presents the net change in external people trips. However, no table has been provided showing the existing people trip generation for the site. While existing car trip generation is shown in Table 7.1, the equivalent baseline people trip data is absent. The applicant is therefore requested to clarify the source of the baseline people trip generation figures used in Table 7.6

In terms of the proposed mode share, the applicant has applied Census 2011 Travel to Work data. However, the Highway Authority requests that the applicant bases the proposed mode share on the most up-to-date and representative dataset available to reflect current travel behaviour. The applicant is therefore required to undertake a comparison assessment using the DfT National Travel Survey (2024) to ensure that the proposed mode share reflects post-pandemic travel patterns. While it is acknowledged that the National Travel Survey does not capture all details of onward or multi-modal journey stages, the applicant may also strengthen the evidence base by undertaking local survey assessments for comparable sites.

Table 7.7 presents the proposed mode share proportions with a food store (adjusted column). It is currently unclear how the percentage reductions have been applied and what assumptions underpin these adjustments. Clarification is required.

Paragraph 7.7.4 applies a 35% pass-by rate on the basis that the site lies on a commuting route; however, no evidence has been provided to substantiate this assumption. Without site-specific survey data or justification, the Highway Authority cannot accept the proposed pass-by and diverted trip reductions. The applicant is requested to supply appropriate evidence to support the percentage applied.

The applicant has made reference to TRICS Research Report 14/1 Pass-By & Diverted Trips and it is anticipated that the applicants use of 35% is linked to the below paragraphs:

6.40 MacIver recommends that the following general rules are used for determining the proportions of pass-by trips at superstore developments in the United Kingdom:

- For superstores located on major commuting routes in larger urban areas, the pass-by proportion may range between 25-35% depending on the levels of traffic flow. It may be assumed that more populous urban areas will generate higher levels of pass-by trips;*
- On other less significant commuting routes, in out-of-town locations and in urban areas with smaller populations, the pass-by proportion can be assumed to be in the range of 15 to 25%;*
- In town centres and on non-primary routes the proportion will be approximately 10%; and*
- In locations with little propensity to generate pass-by trips the proportion can be as low as 5%.*

6.41 The methodology used to devise these percentages is not provided within MacIver's report. However, it is stated that extreme care must be taken when assigning pass-by trips to the road network.

The first thing to note here is that the application site does not include a superstore albeit that a smaller food store could be provided. However, this is likely to have a completely different profile of user. There is also the possibility that the commercial use is implemented as a unit which sells food and drink mainly for consumption on site or even use class E(c) financial/professional services which again would have a completely different profile.

The applicant must therefore assess the wider use classes to ensure a robust assessment is undertaken.

In addition, as can be seen from paragraph 6.41 the TRICS report is clear that extreme care must be taken this is continued further at paragraphs 11.1-11.3 (below).

11.1 The proportion of trips that are pass-by and diverted should be considered as part of the TA Scoping Process. A generic standard reduction is no longer applicable - instead a level of reduction should be determined on a site-by-site basis.

11.2 Steps on how this should be done are illustrated in a process diagram contained within this report. Before starting the process, it is important that the developer and all parties have a clear understanding of the definition of distinction between pass-by and diverted trips. Different development characteristics will produce different trip types.

11.3 It is important to note that this explanatory note does not contain any definitive pass-by and diverted trip percentages that would be used as a standard deduction in trip generation.

The document clearly advises that any reduction must be dealt with in a site by site basis which requires surveys of comparable sites and that the report does not contain blanket percentages to which applicants can utilise to reduce trips from developments. The Highway Authority cannot therefore accept the reduction in trips by 35% as proposed by the applicant.

It is disappointing that this has still not been addressed given that it was originally stipulated to the applicant in the pre application response in May 2023 and within the application response for application 230822.

Table 7.10 presents the proposed development car net change but the figures in daily column are incorrect.

The Saturday assessment does not include any trips from the residential element of the development due to limited TRICS data for residential uses on Saturdays. If the applicant does not intend to undertake additional surveys to establish Saturday residential trip generation for the peak hour (13:00-14:00), then the PM peak

residential car trip generation figures from Table 7.9 should be applied as a worst-case scenario.

The Traffic Impact Appraisal is provided in Section 10 of the Transport Assessment. However, I will reserve detailed comments on the junction modelling until clarification is provided on the matters raised above, as these issues may materially affect the inputs used within the modelling.

Parking

Class E Use Parking

Policy TR5 states 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. Local parking standards are set out in the RBC, Revised Parking Standards and Design Supplementary Planning Document (SPD) which takes into account the accessibility of the site. In accordance with the Council's adopted parking standards, the proposed new Class E food store would require 1 car parking space per 40sqm which would equate to 75 car parking spaces.

The Transport Assessment asserts that the Parameter Plan 14 allows for 53 car parking spaces, a ratio of 1 space per 30sqm for the commercial uses although it is not clear how this figure has been calculated nor has a indicative layout of the car parking been submitted.

The Transport Assessment asserts that the Parameter Plan 14 allows for 53 car parking spaces which is below the Council's adopted standards. It is stated that the proposed Class E food store is expected to function as a neighbourhood facility serving nearby residents, many of whom are likely to walk or cycle given low car ownership levels. Given its scale (compared with larger destinations such as Tesco Extra on Napier Road), the Transport Assessment asserts that the proposed level of car parking is considered proportionate to the size of the store and its local catchment.

However, no evidence has been submitted to substantiate the proposed level of car parking. Given that the provision falls below the Council's adopted standards, this position is not acceptable without robust justification. The applicant is therefore required to submit comprehensive supporting evidence, including a detailed parking-accumulation assessment using appropriately matched TRICS sites, or verifiable on-site parking-demand surveys from a comparable food store. Without this evidence, the reduced parking provision cannot be supported.

In terms of disabled parking facilities, a minimum provision of 3 disabled spaces plus 4% of the total capacity should be provided for the retail use.

In addition, a 10% of communal car parking spaces within a non-residential development should be provided with EV charging points.

Residential Parking

In terms of the residential car parking, it is agreed that the site is in an appropriate location for a reduced level of residential car parking. The approach to provide a lower level of parking is appropriate due to the accessible location for active travel and public transport, and reflecting that there is not likely to be overspill parking arising and therefore no determinantal impact on highway safety.

The proposed scheme proposes to provide a maximum of 130 spaces for up to 700 units, a ratio of 0.19 spaces per unit. Residential car parking is to be provided in a basement car park although the parameter plans do not include an indicative layout of the residential car parking.

The provision of parking for disabled motorists is a key element of all developments. For the residential element, the number of disabled spaces must be provided based on the level of units proposed for disabled persons.

In addition, electric vehicle (EV) charging points must be provided within the residential parking area, in accordance with the requirements of current Building Regulations. Provision should meet or exceed the standards set out in Part S (Infrastructure for Charging Electric Vehicles), ensuring that appropriate active and passive charging infrastructure is delivered at the outset and integrated into the design of all parking spaces.

Visitor Parking

The Council's Parking Standards and Design SPD requires visitor parking for residential development at a ratio of one space per four units. No dedicated visitor spaces are proposed for this scheme. The applicant has sought to justify this on the basis of the Site's close proximity to the railway station and local bus services, and has provided a review of recently approved residential schemes where visitor parking was not required.

However, the applicant's review of recently approved schemes is not considered an appropriate comparator. Those schemes relate to wholly residential developments, whereas the current proposal comprises a mixed-use scheme incorporating a retail store. Visitor patterns for residential units within a mixed-use environment differ materially from those within stand-alone housing schemes. In this context, it is not reasonable or realistic to assume that all visitors will arrive via sustainable modes such as bus, rail, or cycling. The lack of dedicated visitor spaces would potentially result in residential visitor demand spilling over into parking areas intended for the retail element and the wider public realm.

The absence of dedicated visitor parking is therefore likely to result in increased parking stress and vehicle circulation within the site, reducing the availability of spaces for retail customers and creating conditions that may adversely affect the safe and efficient operation of the highway.

Car Club Provision

The applicant proposes the introduction of a car club facility, with 6 no. car club spaces to be located within the public realm surrounding the residential blocks. The intention is to reduce reliance on private car ownership and encourage the use of

more sustainable modes of travel. The Framework Travel Plan confirms that the car club will be actively promoted to residents of the development, and that its benefits will also be available to the wider local community. The provision of the car club should be secured through a clause in the S106 agreement.

Cycle Parking

The RBC cycle parking standards are outlined in the Revised Parking Standards and Design SPD, which is set out in Table 2.1.

Table 2.1: Reading Borough Council Cycle Parking Standards

Size	Required No. of Parking Spaces
1-2 Bed Flat	0.5
3+ Bed Flat	1
Food Retail	1 space per 6 staff and 1 space per 300sqm

The Design Code states that cycle parking will be provided throughout the development in secure and convenient areas in compliance with RBC Transport and Highway Guidance. However, the Design Code should also make reference to LTN 1/20 in respect of cycle parking. The Design Code should be updated to reflect this.

The outline application proposes cycle parking at the ground level of the proposals in cycle stores, which could contain a mixture of two-tier racks and Sheffield Stands. Details of the cycle parking will be designed and detailed at the appropriate Reserved Matters stage, with a provision of 600 cycle parking spaces to be provided. Sheffield Stands will also be provided for visitors to use in the public realm of the residential section of the Site.

In principle this is acceptable to the Highway Authority, however, the comments made by ATE should also be reviewed in relation to the total provision and to ensure that parking provision is also made for non-standard cycles, such as accessible cycles, tricycles and cargo bikes. This should be a minimum of 5% of the total spaces as outlined in LTN 1/20 11.3.2.

Travel Plan

A Framework Travel Plan has been submitted to accompany the planning application and this is accepted given that the actual travel patterns of residents will be unknown until occupation of the development.

The trip generation for the Travel Plan has been based on the Census Travel to Work Data. However, the best approach is to base targets on the DfT National Travel Survey (2024) (which has also been requested by ATE in the formal response).

The Travel Plan sets out that the residential car driver mode share has been assumed to be 30.4% (based on the 2011 Census Travel to Work) until surveys are undertaken to establish the baseline of residents, which will be at 75% occupation of the first phase of residential units, and at 75% occupation of each phase thereafter.

Post-occupation surveys will be undertaken using a resident travel survey to collect information on travel-to-work mode share and other travel-related behaviours. Additionally, observational surveys will be carried out at key locations, including the residential basement car park entrance, cycle stores and pedestrian routes serving the residential blocks. These surveys will record usage patterns and help establish a clearer understanding of resident travel behaviour. The results will help inform the measures, targets and actions of the Travel Plan Coordinator (TPC).

The modal share targets are set out in Table 4.1, which aims for a reduction in car modal share to 20.4% at the end of year 5. However, a 20.4% car modal share is still high considering the town centre location and connectivity of this site, as well as the limited parking spaces. For clarity, a 20.4% target after 5 years equates to 143 travel to work vehicle trips whilst the application site provides just 130 car parking spaces. The proposed target is therefore not aspirational and is an arbitrary figure based on the travel to work mode share and is not representative of the application proposals.

Therefore, the Travel Plan targets should be revised to ensure they more accurately reflect the characteristics and context of the development. The current targets do not provide a realistic or aspirational framework for achieving meaningful modal shift towards sustainable travel choices.

The Highway Authority requests that specific remediation measures are identified at this stage to be implemented in the event that the Travel Plan targets are not achieved. Such measures could, for example, take the form of additional funding contributions towards active travel interventions or extending the annual review period until the modal shift targets are achieved.

The Travel Plan Framework should be updated to reflect the above.

Conclusion

The Highway Authority requests that additional and/or revised information and plans are submitted to address the points raised above prior to determination of the application. At this stage, the information provided is insufficient to allow a robust assessment of the development's highway and transport impacts.