



Proof of Evidence of Paul Matthews  
Town and Country Planning Act 1990  
Planning Appeal by Gladman  
Land off Peppard Road, Emmer Green

April 2018

South Oxfordshire District Council Ref: P16/S3630/O

Planning Inspectorate Reference: APP/Q3115/W/17/3185997



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# 1 Introduction

## 1.1 Qualifications and Experience

- 1.1.1 My name is Paul Richard Matthews and I am an Independent Traffic Consultant. I hold a Bachelor of Science Degree in Civil Engineering from City, University of London. I am a Chartered Engineer, a Member of the Institution of Civil Engineers since 1980 and a Member of the Chartered Institution of Highways and Transportation. Formerly I was a Projects Director at MVA Consultancy (now called SYSTRA UK Ltd) and the Technical Group Leader for MVA Consultancy's Traffic Engineering and Planning work. I have been engaged on projects ranging from highway layout and traffic management to comprehensive transport planning. Though semi-retired, I regularly carry out Road Safety Audits and have lectured on Traffic Engineering, Road Safety Audit and Construction Safety Courses in the UK and overseas.
- 1.1.2 I have been engaged on transport and traffic engineering projects for over fifty years in both local authorities and consulting engineers. I am an Associate of Urban Flow Ltd and my former employers were: MVA Consultancy; Sir Alexander Gibb and Partners; Freeman Fox and Partners; The London Borough of Hammersmith and Fulham; The London Borough of Ealing; The Royal County of Berkshire; and contractor Sydney Green (Civil Engineering) Ltd (now called Associated Asphalt).
- 1.1.3 Until recently I was a Professional Reviewer for the Institution of Civil Engineers and I am co-author of *Traffic Engineering Design Principles and Practice* published by Elsevier which is now in its second edition. I was the editor for the Traffic Engineering section of the Institution of Civil Engineers, *Manual of Highway Design and Management* published in 2011 by Thomas Telford Ltd and I wrote four chapters of the Manual.
- 1.1.4 I have given expert evidence, at Public Inquiries and Magistrates' Court hearings for: the London Borough of Hillingdon, North Norfolk District Council, Dorset County Council, the London Borough of Ealing, the London Borough of Hammersmith and Fulham and prepared evidence for the Royal County of Berkshire.

## 1.2 Appointment by the Campaign Against Gladman in Eye and Dunsden

- 1.2.1 Since January 2011 I have given traffic, transport and highways advice to the Caversham And District Residents Association (CADRA). Also, I have advised CADRA on the traffic issues associated with major planning applications within Reading Borough Council's boundaries and the neighbouring areas within South Oxfordshire District Council.
- 1.2.2 I have been CADRA's representative at the Campaign Against Gladman in Eye and Dunsden (CAGE) meetings since it was formed in 2016. I was asked to advise on the traffic issues related to the proposed development of land off Peppard Road, Emmer Green.

## 1 Introduction

1.2.3 I am familiar with the site and with transport issues in South Oxfordshire and Reading in part because I am a resident of Caversham. However, I want to make clear that my evidence is based upon my professional experience as a Chartered Civil Engineer.

1.2.4 This document contains my proof of evidence in response to the appeal, by Gladman Developments Ltd, against the refusal of planning permission for the development by South Oxfordshire District Council on 6<sup>th</sup> September 2017.

### 1.3 The Planning Application

1.3.1 The planning application was submitted to South Oxfordshire District Council by Gladman Developments Ltd on 31<sup>st</sup> October 2016.

1.3.2 The proposal was described as:

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

1.3.3 The land owner is: Trustees of Phillimore Successor's Settlement C/O Adrian Beales.

### 1.4 Application Site

1.4.1 The application site near Emmer Green is currently in agricultural use. The site fronts Kiln Road, Emmer Green on its east side and Peppard Road (B481) on the west side. Peppard Road is an important approach to Emmer Green and Caversham from the north and leads towards Reading and Caversham Bridges over the River Thames.

1.4.2 The application site extends to approximately 13.48 hectares. To the north, west and east is open farmland and woodland. Bryants Farm, and buildings which are partly in commercial use, is to the east of the site. To the south is the border between Reading and Oxfordshire. On the Reading side are dwellings in Phillimore Road, Marchwood Avenue, Cherry Close and Autumn Close.

1.4.3 Two vehicular accesses are proposed, one on Kiln Road and the other onto the B481 Peppard Road.

- ▶ **Kiln Road** – A priority 'T' junction would be constructed just north east of the Reading Borough boundary. Two single-lane, priority give-way, traffic calming features would be constructed to the north-east and south-west of the new junction point to control vehicle speeds. A new footway would be built on the north-west side of Kiln Road, from the access in South Oxfordshire to tie into the existing footway within Reading Borough.

Subject to the agreement of the Highway Authority, the 30 mph speed limit would be extended north-eastwards along Kiln Road to include the new access.

- ▶ **B481 Peppard Road** – A priority ‘T’ junction would be constructed approximately 100 metres north of the Reading Borough Boundary. A hatched ‘ghost’ island would be installed with a right turning lane. A bus lay-by would be installed on the east side of Peppard Road; a new paved footway would be constructed from the lay-by to the new access and from the new access southwards to link to the Reading Borough boundary. The drawing does not indicate if the footway would link to the existing footway at Tower Close (approximately 110 metres further south). A pedestrian refuge island would be constructed north of the access, within the hatched area to provide a two-stage crossing of Peppard Road to a new bus stop and paved waiting/alighting area for passengers. Subject to the agreement of the Highway Authority, the 30mph speed limit would be extended to the north of the access.

## 1.5 Reasons for Refusal of Planning Permission

1.5.1 The reasons for refusal of the Outline Planning Application by the South Oxfordshire District Council, the Local Planning Authority, on 6<sup>th</sup> September 2017 are:

- 1 *The application site lies in open countryside, outside any defined settlement boundary in the South Oxfordshire Core Strategy and the proposed development would represent a significant encroachment into the open countryside. As a result the proposal would detract from the undeveloped rural character and appearance of the site and its surroundings and the attractive landscape setting of the settlements in the district and would not comprise sustainable development as defined by local and national legislation. As such the proposal is contrary to policies CSS1, CSR1 and CSEN1 of the South Oxfordshire Core Strategy, policies C4, G2 and G4 of the South Oxfordshire Local Plan 2011 and Government Guidance within the National Planning Policy Framework.*
- 2 *In the absence of a completed S106 legal agreement, the proposal fails to secure affordable housing to meet the needs of the district. As such, the development would be contrary to the National Planning Policy Framework and Policy CSH3 of the South Oxfordshire Core Strategy.*
- 3 *In the absence of a completed S106 legal agreement, the proposal fails to secure on and off site infrastructure necessary to meet the needs of the development. As such, the development would be contrary to the National Planning Policy Framework, Policy CS11 of the South Oxfordshire Core Strategy and Policies T1, R2 and R6 of the South Oxfordshire Local Plan 2011.*
- 4 *In the absence of a completed S106 legal agreement, the proposal fails to secure funding to mitigate the potential adverse effects of the proposed development to local wildlife sites in conflict with Section 11 (Conserving and enhancing the natural environment) of the NPPF*

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### 1.6 Scope of Evidence

- 1.6.1 I shall be dealing with the reasons for refusal 1 and 3 and will address other issues that, I believe, are relevant to the Appeal and were insufficiently addressed by South Oxfordshire District Council and its consultees Oxfordshire County Council and Reading Borough Council.

### 1.7 References

- 1.7.1 In my evidence I will refer to the following documents and other information:
- ▶ **CDF1-1.7** - Land off Peppard Road, Emmer Green, Oxfordshire, Transport Assessment, Dated: October 2016, Report Ref: 1502/2/A by Ashley Helme. Core Documents, Folder 1, CD1, 1.7, Abbreviated Reference;
  - ▶ **CDF2-4.6** - Consultation Responses – Highways (Oxfordshire County Council);
  - ▶ **CDF2-4.7** - Consultation Responses – Highways (Reading Borough Council);
  - ▶ **CDF3-7.1** - South Oxfordshire Local Plan 2011;
  - ▶ **CDF3-7.4** - South Oxfordshire Core Strategy 2012;
  - ▶ **CDF3-7.5** - South Oxfordshire Core Strategy – Inspectors Report;
  - ▶ **SODC PS CS** - South Oxfordshire Proposed Submission Core Strategy December 2010;
  - ▶ **SODC IS S1** - South Oxfordshire Local Plan 2031, Issues and Scope, Stage One Of The Process, June 2014;
  - ▶ **SODC RO S2** - South Oxfordshire Local Plan 2031, Refined Options, Stage Two Of The Process, February 2015; and
  - ▶ **TMA 2004** - The Traffic Management Act 2004.



## 2 Strategic Transport Issues

### 2.1 Introduction

- 2.1.1 This chapter deals with the context of the proposed development. This Public Inquiry has been called to consider this specific application; however, the geographical location of the site, within Oxfordshire, directly abutting its boundary with Reading Borough is of fundamental importance.
- 2.1.2 The Reading side of the border is fully developed and the Oxfordshire side is open countryside. The Appellant has recognised this fact as its documents demonstrate and accept that the proposed development would be an extension of Reading Borough (**CDF1-1.7** Paragraph 4.3.1 refers to Drawing No. 1502/15/A Peppard Road Access and Paragraph 4.4. Drawing No. 1502/14/B Kiln Road Access). These drawings show that footway access would be constructed into Reading Borough. The generated trip distribution is derived from Table 2 2011 Census Distribution, Place of Work, Residents in Reading 001, Middle Layer SO Area.
- 2.1.3 It is for this reason the proposal cannot simply be considered as an isolated part of rural Oxfordshire. In my view, they must be viewed, within the context of its geographical location, as an extension to the town of Reading.

### 2.2 Highway Infrastructure Context

- 2.2.1 The primary purpose of Town and Country Planning is to produce a strategic plan that balances needs with resources. Each Local Authority is tasked with producing a vision and a plan for the future development of its area. Both South Oxfordshire District Council and Reading Borough Council have done this (Ref: **CDF3-7.4**).
- 2.2.2 The plans are, periodically revised and updated in response to National Policy, economic and demographic changes. Although the titles of these plans change, their fundamental objectives do not. Whilst new plans are being formulated, earlier plans do not lapse until they are overtaken by newly adopted plans or are overtaken by national policy changes. All plans including the emerging SODC local Plan are consistent in not designating this site for development.
- 2.2.3 Development control occurs within the overall plan strategies. Planning officers' considerations should be 'plan-led' and must refer to strategic plans when making recommendations about planning applications. Planning Authorities are obliged to consult with highway authorities including neighbouring authorities and give due weight to their Adopted Plans and heed their advice (Ref: **T&CPA 1990, TMA 2004**).
- 2.2.4 The application documents submitted by Phillimore/Gladman demonstrate that the proposed development would extend the Reading urban area and place additional demands on Reading's

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highway and public transport resources. The development would have no allegiance to South Oxfordshire.

2.2.5 Consideration of trip generation, highways and traffic are an intrinsic part of the planning application process. These issues were raised by the administrative area that would be most affected by this proposal, Reading.

- Reading Borough Council's objection to the development was, consistently maintained throughout, but appeared to be ignored by South Oxfordshire officers in their report to the Planning Committee on 6<sup>th</sup> September 2017 (Ref: **CDF2-4.7**). The SODC Planning Officer continued with her understanding that Reading Borough Council had withdrawn its objection, even when confronted, during the Planning Committee meeting, by a Reading Councillor who exhibited the letter of objection.

2.2.6 The planning officer's report to the SODC Planning Committee on 6 September 2017 was devoted to detailed considerations; SODC's Spatial Strategy and Reading Borough's adopted plans were not mentioned. The Planning Officer's report to SODC Planning Committee did not address the issue of the proposal's location adjacent to a major town in land that is not designated for any development. The Outline Planning Application could, with justification, have been dismissed in the planning officer's report and by the Committee. The detailed considerations would not then have been relevant.

### 2.3 Relationship Between Oxfordshire and Berkshire Authorities

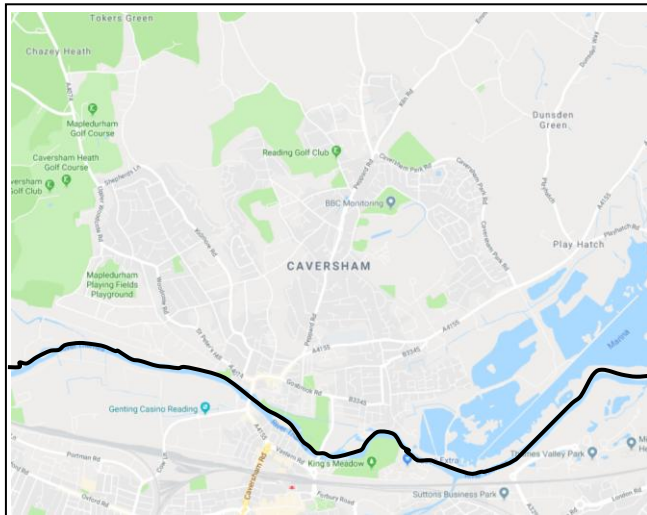
2.3.1 In order to understand the local transport issues, that have culminated in South Oxfordshire District Council and Reading Borough Council opposing development on their shared border, it is essential to appreciate how the historic County of Oxfordshire, on the north bank of the River Thames developed.

2.3.2 In the 18th century cross-border disputes between Berkshire and Oxfordshire occurred regularly and the picture of Old Caversham Bridge is a graphic example of how the two authorities failed to co-operate. Each authority built a different type of bridge to the island in the middle of the river. This quarrel continued into the 19th century.

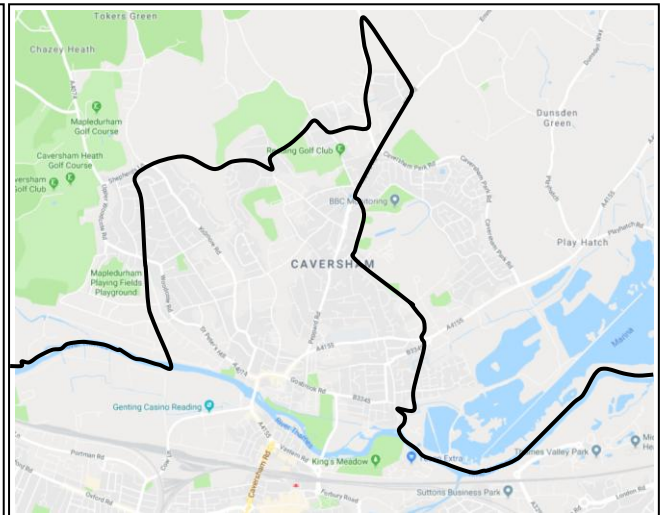


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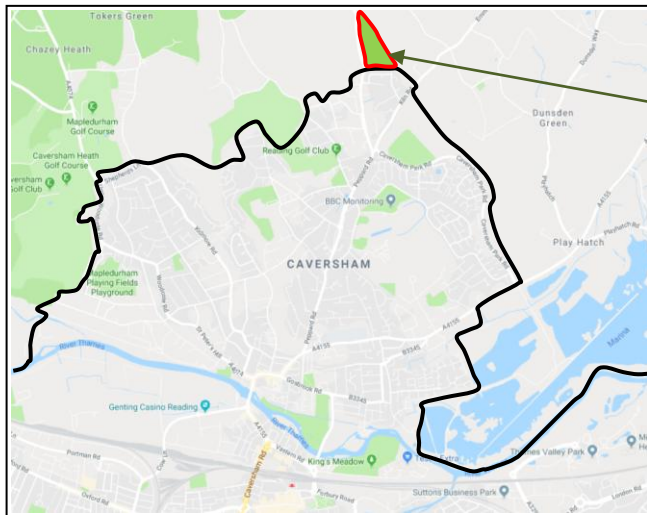
- 2.3.3 The town of Reading expanded rapidly after the Great Western Railway arrived in 1840. The South Oxfordshire village of Caversham was separated by the new railway line, open countryside and the River Thames. Reading quickly expanded up to the River Thames and became the County Town of Berkshire in 1867. Border disagreements were only partly resolved when the village of Caversham was integrated into Reading Borough and Berkshire in 1911. To some extent the cross-border problems continued into the 21st century.
- 2.3.4 Successive, residential developments on the edge of Caversham, within the Oxfordshire countryside, were absorbed by Reading's expanding boundary including the Oxfordshire village of Emmer Green. Some of these developments occurred before the rapid growth in motorised transport; later developments were not matched by corresponding improvements to highway infrastructure.
- 2.3.5 Caversham and Emmer Green grew organically with piecemeal developments and without properly planned transport and other infrastructure. The driver for these changes was the economic success and employment opportunities in Reading, the fast rail links to London, Southampton, Wales, the West Country and the Midlands and the M4 Motorway.
- 2.3.6 There were some changes to the highway infrastructure after 1911: the construction of Reading Bridge in 1923, replacement of Caversham Bridge in 1926, the realignment of St Peter's Hill and Henley Road in the 1930's. The only coherent improvements were the construction of Lowfield Road and Caversham Park Road, in the late 1960's, when the area known as Caversham Park Village was still part of Oxfordshire.
- 2.3.7 The Borough of Reading's population north of the river grew from around 9,800 in 1911 to around 32,000 currently. It should be appreciated that Reading Borough Council was, and still is, powerless to plan and control this expansion or expansion further into South Oxfordshire at Sonning Common and Woodcote. Reading Borough Council has been saddled with a legacy of highway related problems including: traffic delays, congestion, road safety, poor air quality and severance. Reading boundary changes since 1900 are shown below.
- 2.3.8 Reading is the regional centre for a large part of South Oxfordshire and residents are rightly concerned that their access to services would become increasingly more difficult. Unchecked, development would eventually engulf the numerous small settlements and overload the rural road network. Residents of Emmer Green, Caversham and Reading are currently suffering from a poorer quality of life caused by earlier failures to co-operate.
- 2.3.9 Reading Borough Council and South Oxfordshire District Council have harmonised their opposition to further extensions to Reading north of the Thames and into open countryside. The main reason for this welcome change in opinion is the realisation that the lack of co-ordinated transport planning has resulted in a saturated and congested highway network on the approaches to and within Reading.



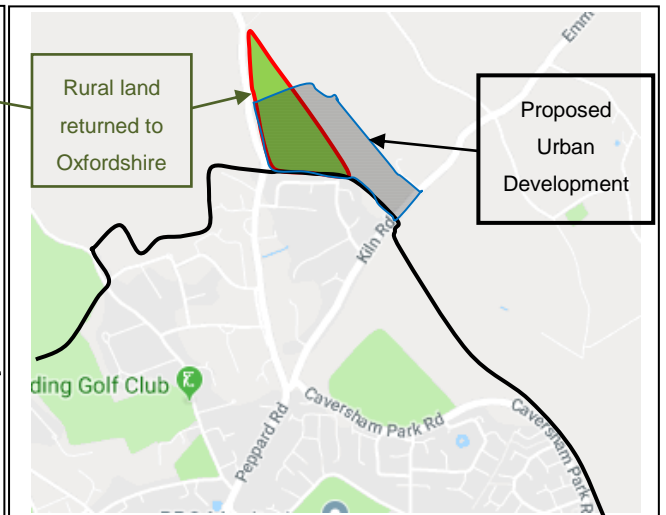
Reading Boundary before 1911



Reading Boundary 1911



Reading Boundary 1977



Reading Boundary 2018

- 2.3.10 Following representations from members of the public and the local authorities concerned, the Boundary Commission, in 1977, redrew the Reading boundary so that it closely follows the edge of the urban area. At the same time an anomalous 'triangle' of rural land was returned to Oxfordshire. Part of this undeveloped rural triangle now falls within the area identified by the Appellant for urban development. Furthermore the extension of Reading-Berkshire boundary into the rural area was rejected by the Boundary Commission in 1909, 1945, 1977 and 1991.
- 2.3.11 The current accord between the adjacent authorities is fragile and old disagreements could be re-kindled. If unwanted development is permitted, it is likely that the Boundary Commission will be forced, once again, to redraw the boundary between rural Oxfordshire and urban Reading. Also pressure will be further increased for a superimposed framework of distributor roads and for a third, and possibly fourth, Reading Bridge.

### 2.4 Planning Policy and Strategy SODC Local Plan

- 2.4.1 The references to the following documents are included here to show the consistency in the development of South Oxfordshire planning policy in recent years.
- 2.4.2 In 2014 SODC consulted on the option of locating housing adjacent to the edge of Reading.

(Ref: South Oxfordshire Local Plan 2031, Issues and Scope, Stage One Of The Process, June 2014) (Ref: **SODC IS S1**).

#### **Option F: Next to neighbouring major urban areas**

*Our rural district lies immediately adjacent to the major town of Reading and the city of Oxford. Here there are many employment opportunities as well as universities, regional hospitals and bigger shopping centres. One option would be to put our housing growth on the edge of these neighbouring urban areas.*

This option was specifically rejected:

(Ref: South Oxfordshire Proposed Submission Core Strategy December 2010) (Ref: **SODC PS CS**)

*7.22. As part of our distribution strategy we have considered land outside Reading. Some of this lies within the floodplain and other areas within the Chilterns AONB. Further development focused on Reading would increase the pressures on the constrained bridges crossing the Thames and the strategy **does not therefore provide for urban extensions to Reading.***

- 2.4.3 In the October 2012 Planning Inspectorate review of SODC Core Strategy the Planning Inspector examining the SODC Core Strategy reported:

(Ref: Report to South Oxfordshire District Council by Roy Foster MA MRTPI, an Inspector appointed by the Secretary of State for Communities and Local Government, Date:23rd October 2012, PINS/Q3115/429/4) (Ref: **CDF3 - 7.5**).

106. Turning to the CS coverage of Thames crossings, there has been 'considerable pressure' for a new bridge near Reading, but OCC and SODC do not consider that a convincing case has been made for a bridge as an appropriate solution to cross-river issues in that area. However, policy CSM1(iv) commits them to continue current working arrangements with other local authorities affected by cross-Thames travel near Reading. The CS is therefore sound on this point.

- 2.4.4 The Refined Options document February 2015, confirmed Option F as not appropriate.

(Ref: South Oxfordshire Local Plan 2031, Refined Options, Stage Two Of The Process, February 2015)  
(Ref: **SODC RO S2**)

*Option F: Next to neighbouring major urban areas. As with 'Option D', this is not likely to be the most appropriate way deliver the new homes required for South Oxfordshire. However, it could help accommodate unmet need from Oxford.*

- 2.4.5 All current SODC planning policy relating to land adjacent to the Reading boundary has been limited to small, exceptional development, except for specific provision for development in existing larger and smaller villages.

- 2.4.6 This application for 245 new homes, adjacent to the Reading boundary and separate from existing SODC settlements is, therefore, contrary to both adopted and emerging SODC planning policy (Ref: **CDF3 - 8.1**).

### 2.5 Transport Links - Thames Crossing

- 2.5.1 No work appears to have been undertaken to show the impact of possible additional trips across the Thames to and from the development. South Oxfordshire District Council, Core Strategy, December 2012, (Ref: **CDF3-7.4**) Policy CSM1 Transport states in Paragraph (iv).

*"The council will work with Oxfordshire County Council and others to:..."*

*"...(iv) work with the authorities affected by cross Thames travel in the Reading area to ensure that traffic and environmental conditions in South Oxfordshire are improved by the implementation of measures which also improve access to Reading;..."*

- 2.5.2 The cumulative impacts of developments in SODC have contributed to a significant worsening of traffic conditions in Emmer Green, Caversham and Reading.
- 2.5.3 The effects of recently approved developments and those under construction in South Oxfordshire have yet to be experienced but there is no doubt in my mind that they will exacerbate existing traffic problems.
- 2.5.4 Reading and Caversham bridges are both listed by the Institution of Civil Engineers as Historic Engineering Works. Sonning Bridge is listed Grade II by Historic England and Henley Bridge is

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listed Grade I by Historic England. Additional traffic over these important structures is unwelcome.

- 2.5.5 Wokingham District Council, together with: Reading Borough Council, Oxfordshire County Council and South Oxfordshire District Council, is undertaking a study to evaluate a possible 'Third' Reading Bridge over the Thames. This bridge could remove some of the South Oxfordshire 'through' traffic from Reading, Caversham, Sonning and Henley Bridges. The New Thames Crossing East of Reading, Strategic Outline Business Case, published by Wokingham Borough Council in May 2017 suggested that the earliest opening date for this might be 2025.





## 3 Traffic and Transport Issues

### 3.1 Introduction

3.1.1 This chapter addresses, in detail, the Council's reasons for refusal of Planning Permission.

### 3.2 Reason for Refusal 1

*The application site lies in open countryside, outside any defined settlement boundary in the South Oxfordshire Core Strategy and the proposed development would represent a significant encroachment into the open countryside. As a result the proposal would detract from the undeveloped rural character and appearance of the site and its surroundings and the attractive landscape setting of the settlements in the district and would not comprise sustainable development as defined by local and national legislation. As such the proposal is contrary to policies CSS1, CSR1 and CSEN1 of the South Oxfordshire Core Strategy, policies C4, G2 and G4 of the South Oxfordshire Local Plan 2011 and Government Guidance within the National Planning Policy Framework.*

### 3.3 Local Traffic

3.3.1 Transport Assessment (Ref: **CDF1-1.7**) Ashley Helme, Table 2 of the 2011 Census data shows that the workplace destinations of car driving residents of the new development are likely to be:

From Proposed Development site:	Generated Traffic
to Reading via Caversham Centre	42%
through Reading via Caversham Centre	17%
to Sonning Bridge Via Caversham Park Village	25%
towards Oxford or Henley-on-Thames	16%

3.3.2 Therefore, 84% of the newly generated traffic would enter Caversham/Emmer Green and 59% would travel through Caversham Centre.

3.3.3 Routes to both Caversham Centre and Sonning Bridge are already heavily congested and suffer long peak period delays (see example photographs at Paragraph 3.4.4). Approximately 25% of the generated traffic would re-enter Oxfordshire near the Henley Road/Caversham Park Road traffic signals for the short journey to join the queue to Sonning Bridge. In these

circumstances, it is reasonable to assert that one additional vehicle equates to one additional vehicle on the queue length.

Peppard Road site access to:	Typical car journey time (min)	Distance (miles)
<b>Reading</b>	<b>12</b>	<b>3</b>
Bracknell	26	15
Maidenhead	29	13
<b>Didcot</b>	<b>31</b>	<b>18</b>
Slough	37	15
Windsor	37	20
High Wycombe	42	21
Basingstoke	44	21
Newbury	46	22
<b>Oxford</b>	<b>44</b>	<b>25</b>
London	78	41

- 3.3.4 The B481 site access is approximately 34 kilometres (21 miles) from the Oxford City Boundary and approximately 100 metres (110 yards) from the Reading Borough Boundary and about 30 km (19 miles) from Didcot. Indeed the site is nearer to other large towns, such as: Newbury, Basingstoke, Maidenhead, High Wycombe and Slough, than to Oxford or Didcot. Of course, during peak periods, car journey times can be much longer than those shown.
- 3.3.5 London is a particular attraction for Caversham and Emmer Green residents due to the fast rail services from Reading to Paddington. In 2019 Elizabeth Line (Crossrail) services will take passengers directly to Bond Street, Tottenham Court Road and other Central London stations. Network Rail hopes to complete a new rail link to Heathrow Airport by 2024. Rail journeys from Reading to Oxford take about 24 minutes and to London Paddington about 27 minutes. .
- 3.3.6 Potential residents of the proposed development are more likely to find employment in other places in preference to Oxford or South Oxfordshire (as shown in Table at Paragraph 3.3.1) .
- 3.3.7 The peak hour private car trip generation figures appear to be low in the Transport Assessment (Ref: **CDF1-1.7**). The proposed development is on the boundary of a major town and in an area that is unattractive to the use of sustainable transport modes. It would have been helpful if new data had been collected from other Emmer Green developments with a similar residential demographic. Reliance upon generic trip data is not appropriate at this extreme edge of town location.

### 3.4 Impact of Proposed Development

3.4.1 In their Transport Assessment (Ref: **CDF1-1.7**), Ashley Helme has shown that the proposal would increase traffic demand at various junctions in Oxfordshire and Reading. In order to define which of the affected junctions they should assess the TA states that:

8.7.1 *The March 2007 GTA was withdrawn in 2014. At the time of preparing this TA report, there is no alternative document that provides clear guidance on traffic impact and the need for detailed junction modelling.*

8.7.2 *In the absence of alternative guidance, the tests adopted to determine if a more detailed junction assessment is required is if the proposed development is predicted to generate an increase in traffic at a study junction of:*

*(i) Test 1: 30 vehicles or more, and*

*(ii) Test 2: 2.5% or greater of the total 2022 Base junction flow.*

*Junction modelling is undertaken of the TA Study Junctions where the traffic impact of the development exceeds 30 vehicles and is also 2.5% (or greater) than the total 2022 Base junction flows.*

3.4.2 Whilst the second test applied by Ashley Helme appears to be reasonable it is unlikely that it would take into consideration junctions with high traffic flows and existing heavy congestion. This simple example shows that the use of percentage changes can be risky:

▶ Existing junction flow: 500 veh/hr, generated flow: 30veh/hr, change: 6.0%

▶ Existing junction flow: 2000 veh/hr, generated flow: 30veh/hr, change: 1.5%

3.4.3 In the case of the second example junction, it might be heavily congested and sensitive to small changes in flows. It has been suggested that a 1% change in traffic flow is within: traffic survey error; day-to-day variation, seasonal variation or below the variation caused by changing economic activity. Undeniably, the development would increase demand at nearby junctions and, if queues form regularly, then they would be greater after the addition of generated traffic.

3.4.4 The TA has used recognised techniques to estimate the levels of traffic that would be generated by the development and, regardless of how small a percentage of existing traffic that the development would generate, every vehicle added is likely to be an addition to whatever queue length occurs.



The two photographs show southbound queuing at junction SJ8 Peppard Road/Prospect Street during the Easter school holidays, 5<sup>th</sup> April 2018 at about 08:10. The only bus observed was full.

3.4.5 The table below, reproduced from the Transport Assessment (Ref: **CDF1-1.7**) data, shows that junction SJ8 Peppard Road/Prospect Street fell below the arbitrary Test 2, 2.5% threshold and was not considered sufficiently affected to be analysed in full by Ashley Helme. Regular users of this key junction are well aware that peak period queues and delays are usually excessive and, therefore, it has no capacity to accept additional demand.

No.	Junction Name	AM		PM		Junction Type
		Vehs	%	Vehs	%	
SJ1a	Site/Peppard Road	65	5.8	66	5.9	priority control
SJ1B	Site/Kiln Road	61	28.5	62	40.0	priority control
<i>SJ2</i>	<i>Peppard Road/Tower Close</i>	<i>53</i>	<i>4.4</i>	<i>53</i>	<i>4.6</i>	<i>priority control</i>
<i>SJ3</i>	<i>Kiln Road/Marchwood Avenue</i>	<i>53</i>	<i>19.1</i>	<i>53</i>	<i>25.6</i>	<i>priority control</i>
<i>SJ4</i>	<i>Kiln Road/Caversham Park Road</i>	<i>76</i>	<i>8.9</i>	<i>76</i>	<i>9.1</i>	<i>priority control</i>
<i>SJ5</i>	<i>Peppard Road/Kiln Road</i>	<i>83</i>	<i>4.9</i>	<i>83</i>	<i>4.9</i>	<i>priority control</i>
<i>SJ6</i>	<i>Buckingham Drive/Lowfield Road</i>	<i>58</i>	<i>3.1</i>	<i>60</i>	<i>3.0</i>	<i>mini-roundabout</i>
<i>SJ7</i>	<i>Buckingham Drive/Evesham Road</i>	<i>55</i>	<i>2.6</i>	<i>55</i>	<i>2.4</i>	<i>roundabout</i>
<i>SJ8</i>	<i>Peppard Road/Prospect Street</i>	<i>37</i>	<i>1.8</i>	<i>37</i>	<i>1.8</i>	<i>traffic signals</i>
<i>SJ9</i>	<i>Caversham Park Road/Henley Road</i>	<i>46</i>	<i>2</i>	<i>46</i>	<i>2.0</i>	<i>traffic signals</i>
SJ10	A4155 Henley Road/Playhatch Road	46	2.2	47	2.3	roundabout
SJ11	A4155/Harpsden Road	4	0.4	4	0.4	priority control
SJ12	Plough Lane/Emmer Green Road	8	2.8	8	2.8	priority control
SJ13	Peppard Road/Kennylands Road	12	1	14	1.3	priority control.

3.4.6 In practice, large increases in numbers of queuing vehicles may not occur as existing and future road users may choose to modify their travelling behaviour. Road users would have a number of choices for their journey and some might:

- ▶ Change the time of day to travel;
- ▶ Change the day of travel
- ▶ Change the route to their destination;
- ▶ Change their mode of travel (ie take the bus, walk or cycle);
- ▶ Change their destination; or
- ▶ Choose not to make their journey.

3.4.7 Many of these ‘choices’ may have to be made by road users with or without the development and could have a serious impact on the local and wider highway network. Changes to the time of travel can result in the phenomenon called ‘peak spreading’ where the peak period starts earlier in the day and finishes later. Peak spreading can have a profound effect upon the lives of people and the economic viability of affected areas.

3.4.8 Of course buses do not have these ‘choices’ as they have to follow fixed routes and attempt to run to a timetable. Buses would be delayed for increasing periods of time and this would affect their ridership numbers and, ultimately, their economic viability.

3.4.9 Failure to consider this key junction (SJ8 Peppard Road/Prospect Street) and other congested downstream locations such as: Reading Bridge and Caversham Bridge, and the junctions of

Church Street / Church Road / Bridge Street, Gosbrook Road / Church Street / Prospect Street and Gosbrook Road / George Street does not inspire confidence in the Transport Assessment (Ref: **CDF1-1.7**).

- 3.4.10 The existing network is saturated during peak periods and there is little scope for increasing vehicle throughput. Because it has not addressed wider issues, the Transport Assessment (Ref: **CDF1-1.7**) failed to demonstrate that there would not be an unacceptable rise in traffic associated with the development, and that it would not be prejudicial to the free flow of traffic and operation of the highway network.
- 3.4.11 Caversham Globe has recently started monitoring air quality at various sites in Caversham centre. Analysis of the first collector is not encouraging; the result was 56.2 µg/m<sup>3</sup> (micrograms per cubic metre) of Nitrogen Dioxide (NO<sub>2</sub>). The European Union has set the legal limit for NO<sub>2</sub> pollution at an annual mean of 40 µg/m<sup>3</sup>. Analysis of the next batch of collectors will take several weeks.
- 3.4.12 Of course air pollution level results are affected by traffic flows but also: weather conditions, time of year, distance from pollution source, topography, etc. Air pollution can have significant negative health effects especially on the most vulnerable in society, such as children who are at the greatest risk.
- 3.4.13 Even a 1% increase change in traffic flow is likely to have an unacceptable impact on the free flow of traffic and health of those living in Caversham.
- 3.4.14 The Transport Assessment is contrary to: South Oxfordshire District Council, Core Strategy, December 2012, (Ref: **CDF3-7.4**) Policy CSM2 Transport Assessments and Travel Plans.

#### 3.5 Sustainable Modes - Walking

- 3.5.1 The developer proposes to construct new footways to link the development to shops and services in Emmer Green and beyond. Approximate walking times at 4.8 km/hr (3.0 mph) from the development centroid would be:
- |                               |                     |            |
|-------------------------------|---------------------|------------|
| ▶ Emmer green shops (Budgen): | 1.6 km (1.0 mile)   | 20 minutes |
| ▶ Caversham centre:           | 3.36 km (2.1 miles) | 47 minutes |
| ▶ Reading (Broad Street)      | 4.8 km (3.1 miles)  | 70 minutes |
- 3.5.2 Walking would not be a practical option for Reading and London commuters or Caversham and Reading shoppers and would be of limited appeal to shoppers in Emmer Green. The elderly, those with walking difficulties, push chair and wheel chair users are not likely to consider a two mile round trip to local shops either attractive or feasible.
- 3.5.3 Reading state schools are full and would not be available to residents of the proposed development. There are no South Oxfordshire schools within walking distance and those that might be used are accessed along rural roads and lanes with no pedestrian facilities (footways). The only practical mode that could be used to ferry the majority of children to school would be the private car.

### 3.6 Sustainable Modes - Cycling

- 3.6.1 Cycling has an important role to play in personal transport. It has a minimal impact on traffic flow, produces no pollution and can improve the health of riders. Cycling UK statistics for 2016 show that cycling accounted for 1.5% of all trips and that the average trip length was 5.6 km (3.5 miles). Caversham centre, Reading centre and Reading station are comfortably within this distance. However, many returning cyclists would be discouraged by the one kilometre climb from Caversham centre up to Buckingham Drive. It is, therefore, highly unlikely that cycling would contribute significantly towards the reduction in peak time car journeys from the development.

### 3.7 Sustainable Modes - Public Transport

- 3.7.1 Reading Buses service 25 vehicles are usually full as they approach Caversham centre during peak periods. Passengers from the new development would be able to board Reading bound buses before people living closer to Caversham and Reading and would deny space to existing passengers and may prevent them from using buses.
- 3.7.2 The last number 25 bus departs from Reading, on weekdays, at 20:05 and there is no later bus service. Late arriving London commuters and late shoppers would be forced to use taxis or be collected by private car. Many commuters might choose to drive both ways and this would further degrade the site's sustainability credentials. Evening leisure trips to Reading would be restricted to taxi or private car use.

### 3.8 Promoting Sustainable Transport

- 3.8.1 South Oxfordshire Local Plan 2011, Adopted January 2006, Section 8 - Promoting a sustainable transport strategy (Ref: **CDF3-7.1**) states:

*"TI Proposals for all types of development will, where appropriate:*

- (i) provide for a safe and convenient access to the highway network;*
- (ii) provide safe and convenient routes for cyclists and pedestrians;*
- (iii) be accessible by public transport and have a safe walking route to nearby bus stops or new bus stops and appropriate infrastructure should be provided;*
- (iv) be served by an adequate road network which can accommodate traffic without creating traffic hazards or damage to the environment;*
- (v) where new roads, pedestrian routes, cycleways and street lighting are to be constructed as part of the development, be constructed to adoptable standards and be completed as soon as they are required to serve the development; and*
- (vi) make adequate provision for those whose mobility is impaired."*

### 3 Traffic and Transport Issues

- 3.8.2 The National Planning Policy Framework (NPPF), Chapter 4. Promoting sustainable transport Paragraph 29 states:

*“...The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel...”*

Paragraph 30 states

*“...In preparing Local Plans, local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport...”*

- 3.8.3 Examination of the proposed residential development at Emmer Green shows that potential residents would not have a real choice about how they could travel to schools, shops, employment or leisure as the only practical or viable mode would be the private car.
- 3.8.4 The proposal is, therefore, in breach of both the NPPF and Policy T1 of South Oxfordshire Local Plan 2011 (Ref: **CDF3-7.1**).

#### **3.9 Response of the Highway Authority – Oxfordshire County Council**

- 3.9.1 Oxfordshire County Council's Response to Consultation (Ref: **CDF2-4.6**) on the Development Proposal for land off Peppard Road Emmer Green, Application No: P16/S3630/O, dated 18<sup>th</sup> January 2017 stated at page 4:

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*It is noted that whilst the development site is within Oxfordshire, much of the likely area of impact falls within the jurisdiction of Reading Borough Council. Where relevant the comments set out here refer only to the area of impact that is within the jurisdiction of Oxfordshire County Council.*

- 3.9.2 The response of Oxfordshire County Council is, to some extent, understandable. It recognised that its network would not suffer a significant detrimental impact from traffic generated by the proposed development but Reading's network would. The proposed accesses are within 100 metres of Oxfordshire's southern border and the majority of generated traffic would not affect its network except for the route to Sonning Bridge. Using the Apellant's own Transport Assessment (Ref: **CDF1-1.7**), as shown above, 84% of the generated traffic would leave Oxfordshire and enter Reading Borough.
- 3.9.3 Surprisingly Oxfordshire County Council did not refer to increased traffic demand at Sonning Bridge. Oxfordshire County Council is well aware of the long peak period queues and delays to vehicles wishing to cross the Thames at Sonning.
- 3.9.4 I understand that Oxfordshire County Council did not consult the neighbouring traffic authority, Reading Borough Council on this matter or was aware, at the time of its response to the SODC

### 3 Traffic and Transport Issues

consultation, that Reading Borough Council objected to the development. I believe that Oxfordshire County Council would have taken a more holistic view of the highway implications if the majority of generated traffic was likely to remain on its network.

- 3.9.5 The Traffic Management Act 2004 Part 2 Section 16 - Network Management Duty: requires traffic authorities to consider:

*"...the expeditious movement of traffic on road networks for which another authority is the traffic authority..."*

- 3.9.6 The adjacent traffic authority should be consulted, at an early stage, to enable the traffic impact on that authority's area to be assessed and the level of contribution towards mitigating measures to be agreed before planning permission is granted.

- 3.9.7 The NPPF, Chapter 4. Promoting sustainable transport Paragraph 31 states:

*"...Local authorities should work with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development..."*

- 3.9.8 Oxfordshire County Council clearly ignored its duty to consider the impact on its neighbouring highway authority, Reading Borough Council. Reading Borough Council **has not withdrawn its objection**. In the event that its wishes are not considered, Reading Borough Council has, quite reasonably, set out its minimum requirements for mitigating measures.

#### 3.10 Reason for Refusal 3

*In the absence of a completed S106 legal agreement, the proposal fails to secure on and off site infrastructure necessary to meet the needs of the development. As such, the development would be contrary to the National Planning Policy Framework, Policy CS11 of the South Oxfordshire Core Strategy and Policies T1, R2 and R6 of the South Oxfordshire Local Plan 2011.*

- 3.10.1 If the Inspector is minded to approve this development contributions by developers should be made available to the adjacent traffic authority (Reading Borough Council) where the development would have a detrimental impact. This might be for upgrading highways and junctions, to accommodate generated traffic, and for the provision of additional public transport services. The aim should be for the road network and public transport services to be returned to the levels of capacity that were available before the development was constructed.
- 3.10.2 It should be noted that the arbitrary 2.5% increase in junction flows, as discussed in paragraphs 3.4.2 to 3.4.5 above, is inadequate and effective wider area improvements should be designed, in close co-operation with Reading Borough Council, and fully funded.



### 3 Traffic and Transport Issues

- 3.10.3 Public Realm Improvements that would reduce the impact of traffic on Caversham Centre have been considered by Reading Borough Council in discussions with the local residents and traders associations. These measures would help to address existing deficiencies and might help to mitigate some of the additional problems caused by development generated traffic.
- 3.10.4 Funds are required to achieve a better balance between the needs of all users, whether they travel through in buses, cars and lorries, deliver goods to premises, carry out essential services, ride bicycles, walk or drive. People with disabilities, the elderly, the very young and those using wheel chairs and pushchairs need special consideration.



## 4 Conclusion

### 4.1 Reason for Refusal 1

- 4.1.1 I have demonstrated that the proposed development, alone, would have a significant detrimental effect upon the Borough of Reading and Caversham centre in particular. Caversham has suffered from haphazard, piecemeal development for over a century and this development, with its small percentage increase in traffic flow, would continue this unhappy narrative.
- 4.1.2 A careful review of the Appellant's Transport Assessment (Ref: CDF1-1.7) shows that the development would result in an unacceptable rise in traffic and would be prejudicial to the operation of the highway network. The failure to consider the impact on important junctions within Caversham and upon Caversham, Reading and Sonning Bridges is contrary to Policy CSM1 of SODC Core Strategy (Ref: CDF3-7.4). These sites are already heavily overloaded and their problems have little hope of resolution in the mid to long term. The two local authorities that are most concerned, Reading and South Oxfordshire, have recognised this fact and their existing and emerging strategies unambiguously state that no further development should take place on Reading's northern border. Local settlements are already under severe transport pressure due to the absence of proper planning for the earlier housing developments.
- 4.1.3 Of course, each development proposal should be considered independently on its merits provided that it is within an overall strategy properly defined by the Planning Authority in consultation with those affected.
- 4.1.4 This proposal is outside of the strategy defined by the responsible Authorities. Let us be clear, approval of the development would 'set a precedent' and the consequence would be to invite further developments beyond the Reading Borough Boundary.
- 4.1.5 It is almost impossible to rectify past structural infrastructure errors and, therefore, the consequential damage from this development would be far reaching.
- 4.1.6 If constructed the residential transport 'balance' would be weighted against sustainable modes and heavily towards the private car and contrary to the advice contained in the NPPF and is in breach of Policy T1 of South Oxfordshire Local Plan 2011 (Ref: CDF3-7.1) and SODC Core Strategy Policy CSM2 (Ref: CDF3-7.4).

### 4.2 Reason for Refusal 3

- 4.2.1 Section 106 contributions resulting from discussions between the developer and South Oxfordshire District Council might reduce some of the local effects of the proposal. These

## 4 Conclusion

contributions would be insufficient to mitigate effects of the development further away in Caversham centre, on the Thames Bridges and in Reading town centre.

- 4.2.2 If the Inspector is minded to approve this proposal, the developer should be required to make significant contributions towards the improvement of more remote junctions and Public Realm Improvements in Caversham Centre.

