

PL/25/0883 – Land at the rear of 88 Knights Way

In principle, CADRA supports the proposal to increase pre-school provision in north Reading, given the growing number of young families in nearby developments such as Emmer Green Drive. The use of this awkward and previously underutilised plot appears appropriate and beneficial to the community, and we note RBC's Early Years and Childcare Team has confirmed genuine local demand (62 children on the external waiting list). However, CADRA has several concerns and suggestions.

Age Group of the New Intake

Before turning to our specific concerns, we would flag a point that affects both our transport and staffing comments below: the application does not clearly establish which age group the new places are intended for, and the supporting documents are not consistent on this point.

RBC's Early Years and Childcare Team letter frames the expansion as "primarily" relating to children aged 3–4, with knock-on capacity benefits for younger age groups as older children transition through the setting. The applicant's own Design, Access & Sustainability Statement, however, states that the new space is needed to help "reduce the backlog which has risen since the introduction of Early Yrs Funding for under 3's" (Section 3.1) — implying the driving demand, and quite possibly the actual intake, is for under-3s rather than 3–4-year-olds.

This is not a minor technicality: under-3s (and under-2s in particular) carry materially different transport and staffing implications than 3–4-year-olds. Younger children are typically transported by car or buggy rather than walked or cycled independently, and they require a higher staff-to-child ratio (1:3 for under-2s, versus 1:8 or 1:13 for 3–4s). We would ask the planning officer to seek written confirmation from the applicant of the intended age allocation for the new space before determining the application, as this bears directly on the trip generation and staffing assessments discussed below.

Transport and Access

Grove Road is an area which is already subject to traffic congestion at drop-off and pick-up, as the Emmer Green Primary School is opposite the kindergarten. The Transport Statement forecasts only 7 additional car trips from the 25 new pupils, based on the existing mode split survey (26% car, 74% sustainable modes). We would ask the planning officer to probe several points:

- The parking stress survey (undertaken 2 December 2025, before the extension) already shows peak occupancy of 63% at 15:00–15:30, with parents currently parking on unrestricted stretches of Grove Road in the absence of any formal drop-off area. Adding forecast development traffic pushes this to 69% (41 spaces free) and 59% at the morning peak. While this appears "ample" across the full 200m survey area, it doesn't capture likely clustering directly outside the site entrance, where congestion is already reported.
- As set out above, the intended age allocation for the new space is unclear, and the applicant's own supporting statement points toward under-3s demand as the driver for expansion. The trip generation forecast applies the existing 80-pupil mode split unchanged to the new 25 places; if the actual intake skews younger, car dependency could be materially understated, since younger children are typically driven rather than walked or cycled. We'd ask the planning officer to seek clarity on this before accepting the trip generation figures.

- The claim that many of the 7 additional car trips are "likely" linked to sibling drop-offs at the neighbouring primary school is asserted rather than evidenced by the travel survey; we'd ask for this to be substantiated or dropped.
- No additional cycle parking is proposed on the basis that no new staff are being hired, but this doesn't account for additional pupil buggies/bikes at drop-off. The Statement says the store has room 17 cycles. We ask that the applicant confirms that it is sufficient to accommodate the extra buggies expected?

Safety and Staffing

The application states there will be no increase in staff, on the basis that the existing staffing levels exceed the legally required ratios. We do not think this claim can be accepted at face value, for several reasons.

First, as set out above, the intended age allocation for the new space is unresolved, and the applicant's own Design, Access & Sustainability Statement points toward under-3s as the driver for expansion, in some tension with RBC's letter. This matters because the statutory staff ratio for under-2s (1:3) is considerably higher than for 3–4-year-olds (1:8, or 1:13 if teacher-led), so the staffing headroom required depends heavily on which cohort is expected.

Second, the application's supporting documents are internally inconsistent on basic figures. The Design, Access & Sustainability Statement states the building will allow **24** additional children (Sections 1 and 3.1), while the Transport Statement and RBC's letter both state **25**. Separately, the planning application form (Employment section) states existing and proposed staffing at **16 full-time and 16 part-time employees, totalling 24 FTE**, while the Transport Statement states the kindergarten "currently employs **30 Full-Time Equivalent (FTE) staff**" (Section 3.2.2) — a 6 FTE discrepancy. We would ask the applicant to confirm the correct figures in each case.

We would also note that the Design, Access & Sustainability Statement assesses compliance against "Policy SP5" and "Policy DM4" of the **West Berkshire Local Plan**, which is not the relevant development plan for this site. This suggests parts of the supporting documentation may not have been prepared specifically for this application, which further supports the case for the applicant's assertions to be independently verified rather than accepted as submitted.

Third, Ofsted's regulatory history at this setting warrants caution regardless of which figures are correct. On 11 April 2025, concerns were raised about the provider not meeting requirements relating to staff-to-child ratios, suitable people, and staff qualifications, training and supervision. A regulatory visit on 14 April 2025 confirmed these requirements were not being met, and Ofsted served a Welfare Requirements Notice requiring the provider to ensure minimum adult-to-child ratios were met at all times, with appropriate Level 2/3 qualification coverage, by 1 May 2025. A follow-up visit on 6 May 2025 found the provider had since met these requirements, and Ofsted is satisfied the setting is now compliant and remains registered.

Given the combination of the unresolved age allocation, an unresolved figures discrepancy, apparent reuse of boilerplate content from an unrelated local authority area, and a recent history of ratio non-compliance, we consider it reasonable to ask the applicant to confirm the correct current staffing level, the expected numbers in each age cohort after the increase, and the staff qualifications that will underpin the "no additional staff" claim, cross-checked against EYFS ratios for each cohort. We

acknowledge this ultimately sits within Ofsted's remit rather than planning, but consider the underlying staffing assumptions in the Transport Statement and Design, Access & Sustainability Statement are directly relevant to the planning decision.

Neighbour Impact

We anticipate that neighbours may be concerned about increased traffic and noise, particularly on-street parking pressure on Grove Road at peak times. We encourage the planners to ensure that these concerns are addressed transparently and that the applicant engages constructively with the local community.

Tree Loss and Landscaping

Our previous comments on this application raised concerns about tree loss and a significant (66%) net biodiversity loss requiring off-site credits. We note the site has since been cleared, and the proposed building will sit on the existing hardstanding/concrete pad, so those specific concerns no longer apply.

However, this raises a related concern: the application does not appear to propose any landscaping, planting, or greening as part of the development. The Design, Access & Sustainability Statement describes the site as "a largely hard-standing surface," notes that what grass exists is "a thin layer atop a hardstanding/hardcore base," and proposes only a new pathway to connect the building to the existing facilities — no planting or soft landscaping is proposed. The Biodiversity Net Gain section of the application form claims exemption under the de minimis threshold on the basis that habitat loss is under 25m², despite the overall site area being 94m².

Given the site has already been cleared and is being developed largely on hardstanding, we consider this an opportunity to secure some modest biodiversity or amenity benefit that has not been taken up — for example, boundary planting or a small area of soft landscaping around the perimeter of the new building — rather than leaving the site as bare hardstanding with no green infrastructure at all. These would benefit staff, children and neighbours, and help to reduce noise levels. We would ask the planning officer to seek clarity on whether any landscaping is proposed and, if not, whether a condition requiring modest planting or greening would be appropriate, consistent with the council's usual expectations for even minor developments.

Conclusion

On balance, CADRA supports the proposal subject to the planning officer seeking clarification on the points above, particularly around the intended age allocation for the new space, the realism of the trip generation assumptions, and verification of the staffing and capacity figures, before determining the application.