


West Berkshire Local Plan Review 2022-2039
Proposed Submission Representation Form
Ref:
(For official use only)

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| Please complete online or return this form to: | Online: http://consult.westberks.gov.uk/kse |
| | By email: planningpolicy@westberks.gov.uk |
| | By post: Planning Policy, Development and Regulation, Council Offices, Market Street, Newbury, RG14 5LD |
| Return by: | 4:30pm on Friday 3 March 2023 |

This form has two parts:

- Part A - Your details: need only be completed once
- Part B - Your representation(s): please fill in a separate sheet for each representation you wish to make

PART A: Your Details

Please note the following:

- *We cannot register your representation without your details.*
- *Representations cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.*
- *All information will be sent for examination by an independent inspector*
- *All personal data will be handled in line with the Council's Privacy Policy on the Development Plan. You can view the Council's privacy notices at <http://info.westberks.gov.uk/privacynotices>*

| | Your details | Agent's details (if applicable) |
|---|---------------------|--|
| Title: | C/O Agent | Mr |
| First Name:* | | Joe |
| Last Name:* | | Hickling |
| Job title <i>(where relevant):</i> | | Senior Planner |
| Organisation <i>(where relevant):</i> | Darcliffe Homes Ltd | Boyer Planning Ltd |
| Address* <i>Please include postcode:</i> | | Crowthorne House, Nine Mile Ride, Wokingham, Berkshire, RG40 3GZ |
| Email address:* | | ██ |
| Telephone number: | | ██████████ |

*Mandatory field

Part B – Your Representation

Please use a separate sheet for each representation

The accompanying guidance note available at: <https://www.westberks.gov.uk/lpr-proposed-submission-consultation> will assist you in making representations.

*Your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change(s) as there will **not normally** be a subsequent opportunity to make further representations, **further submissions will ONLY be at the request of the Inspector, based on the matters and issues they identify for examination.***

| | |
|---|--|
| Your name or organisation (and client if you are an agent): | Joe Hickling, Boyer Planning obo Darcliffe Homes |
|---|--|

Please indicate which part of the Local Plan Review this representation relates to:

| | |
|--------------------|----------------|
| Section/paragraph: | Whole Document |
| Policy: | |
| Appendix: | |
| Policies Map: | |
| Other: | |

1. Legally Compliant

Please see the guidance notes for an explanation of what 'legally compliant' means.

Do you consider the Local Plan Review is legally compliant?

Yes

No

Please give reasons for your answer:

Please refer to the accompanying submitted representations.

2. Soundness

Please see the guidance notes for an explanation of what 'soundness' means.

Do you consider the Local Plan Review is sound?

The soundness of the LPR should be assessed against the following criteria from the National Planning Policy Framework (NPPF)

Please tick all that apply:

| NPPF criteria | Yes | No |
|---|-----|----|
| Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development | | |
| Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence | | |
| Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground | | |
| Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF | | |

Please give reasons for your answer:

Please refer to the accompanying submitted representations.

3. Complies with the Duty to Co-operate

Please see the guidance note for an explanation of what 'Duty to Cooperate' means.

Do you consider the Local Plan Review complies with the Duty to Co-operate?

Yes

No

Please give reasons for your answer:

Please refer to the accompanying submitted representations.

4. Proposed Changes

Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this change will make the LPR legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please refer to the accompanying submitted representations.

5. Independent Examination

If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?

Yes

X

No

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Darcliffe have specific land interests within West Berkshire District, which are promoted to be allocated for residential development (Land to the east of Long Lane & south Blackthorn Close, Tilehurst, and Land east of Sulham Hill between Barefoots Copse & Cornwell Copse, Sulham Hill, Tilehurst). In representing Darcliffe, Boyer are well-placed to advise on the appropriateness of the land promoted for development.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

6. Notification of Progress of the Local Plan Review

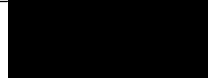
Do you wish to be notified of any of the following?

Please tick all that apply:

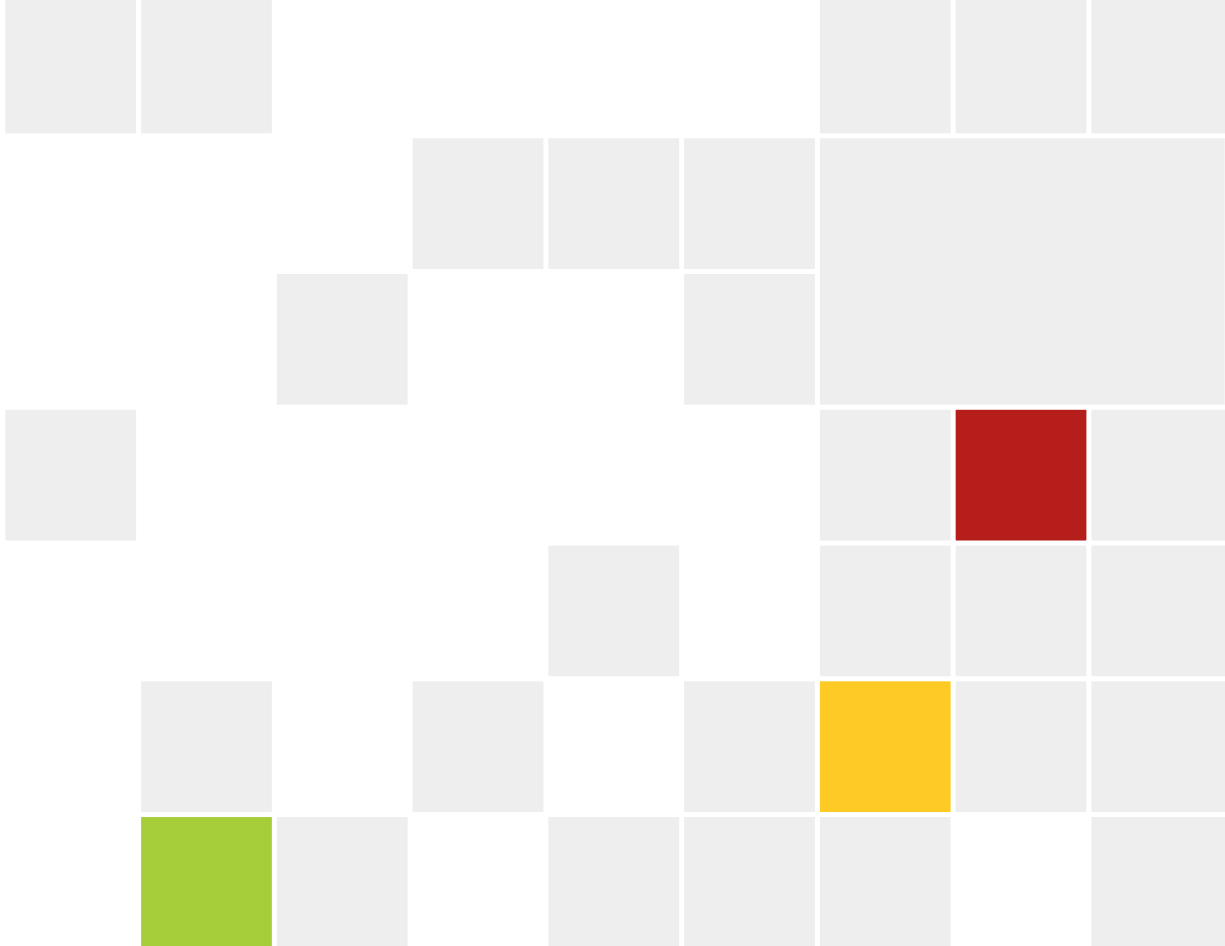
Tick

| | |
|---|---|
| The submission of the Local Plan Review for Independent Examination | x |
| The publication of the report of the Inspector appointed to carry out the examination | x |
| The adoption of the Local Plan Review | x |

Please ensure that we have either an up to date email address or postal address at which we can contact you. You can amend your contact details by logging onto your account on the Local Plan Consultation Portal or by contacting the Planning Policy team.

| | | | |
|------------------|---|-------------|------------|
| Signature |  | Date | 03/03/2023 |
|------------------|---|-------------|------------|

Your completed representations must be received by the Council by 4:30pm on Friday 3 March 2023.



Land to the east of Long Lane & south Blackthorn Close, Tilehurst and
Land east of Sulham Hill between Barefoots Copse & Cornwell Copse,



Sulham Hill, Tilehurst

Representations for West Berkshire Council Regulation 19 Local
Plan Review Consultation



Boyer

Report Control

| | |
|----------------|---|
| Project: | Land to the east of Long Lane & south Blackthorn Close, Tilehurst, and Land east of Sulham Hill between Barefoots Copse & Cornwell Copse, Sulham Hill, Tilehurst |
| Client: | Darcliffe Homes |
| Reference: | 22.1060 |
| File Origin: | https://lrgcouk.sharepoint.com/:w/s/BoyerSP/EaGNbt_IYldOiQJqrpWsZvoBtenPHb6eht7njL-vHLjba?e=Ymp1Cg |
| Primary Author | Joseph Hickling / Daniel Nunn |
| Checked By: | Stuart Crickett |

| <i>Issue</i> | <i>Date</i> | <i>Status</i> | <i>Checked By</i> |
|--------------|-------------|---------------|-------------------|
| V1 | 28/02 | Draft | SC |
| V1 | 03/03 | Final | SC |
| | | | |

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APPENDIX

- Appendix 1 – Site Location Plan
- Appendix 2 – Detailed Assessment of ‘Site A’s’ Deliverability
- Appendix 3 – Detailed Assessment of ‘Site B’s’ Deliverability
- Appendix 4 – Transport and Access Appraisal Report for Site A
- Appendix 5 – Transport And Access Appraisal Report For Site B

1. EXECUTIVE SUMMARY

- 1.1 Boyer have prepared these representations on behalf of Darcliffes Homes Ltd ('Darcliffes'), in response to the 'Regulation 19' consultation relating to the Proposed Submission West Berkshire Local Plan Review (2022 – 2039) ('the emerging plan').
- 1.2 The purpose of these representations is to assist the Council in refining an approach that is consistent with both national planning policy and the tests of soundness. To this end, the representations provide general support to the overall objectives of the emerging plan, but provide detailed commentary in relation to aspects where Darcliffes has concerns with regard to aspects of the emerging plan's soundness.
- 1.3 Darcliffes **supports** the Council's principal objectives, which include seeking to meet the District's local housing needs. However, Darcliffes has concerns in relation to certain aspects of the plan, which we encourage the Council to consider amending prior to submission for examination in public.
- 1.4 Darcliffes recommends the plan is amended in relation to: the duty to co-operate; increasing the level of headroom provided in the identified housing requirement (to both improve the robustness of the planned supply and to deliver additional much-needed affordable housing); allocating a specified amount of development to accommodate unmet need arising in Reading; updating the proposed plan period to include an additional year; and ensuring a robust rolling five-year housing land supply position throughout the plan period, reducing reliance on both the windfall allowance and on larger strategic site allocations that are likely to only begin delivering in the later extent of the plan period.
- 1.5 Darcliffes considers that these concerns could and should be resolved with the introduction of an allocation for residential development:
 - Land to the east of Long Lane & south Blackthorn Close, Tilehurst ('Site A'), for approximately 30 homes.
 - Land east of Sulham Hill between Barefoots Copse & Cornwell Copse, Sulham Hill, Tilehurst ('Site B'), for approximately 49 homes.
- 1.6 The sites both comprise highly sustainable locations, with strong functional links to Reading. As such, both sites are well-positioned to effectively meet a significant proportion of the identified unmet need arising from Reading. Furthermore, the development of the site would provide a significant contribution to ensuring that West Berkshire's identified housing needs can be met, including the provision of approximately 32 much-needed affordable homes (assuming a contribution of 40% in line with emerging Policy SP19).
- 1.7 There are no significant constraints to the development of either site for a combined total of approximately 79 new homes, which Darcliffes is committed to bringing forward through high-quality, well-designed schemes that conserve and enhance the special qualities of the North Wessex Downs AONB through sensitive design. Both sites are located within practical walking and cycling distance from the services and amenities within Tilehurst, and is well-connected to the main settlement of Reading, which provides further linkages to London and other key settlements.
- 1.8 Darcliffes is able to confirm that both sites are available for development now, represent suitable locations for development, and that development of each site is achievable with a realistic prospect that housing can be delivered within the first five years of the draft plan period. Both sites are deliverable and should therefore be favourably regarded in relation to their potential allocation for residential development within the emerging West Berkshire Local Plan. Accordingly, Darcliffes promotes the allocation of:

- Land to the east of Long Lane & south Blackthorn Close, Tilehurst ('Site A'), for approximately 30 homes.
- Land east of Sulham Hill between Barefoots Copse & Cornwell Copse, Sulham Hill, Tilehurst ('Site B'), for approximately 49 homes.

2. INTRODUCTION

- 2.1 Boyer has been appointed by Darcliffe Homes Ltd ('Darcliffe') to act on their behalf in respect of the ongoing promotion of two sites: *Land to the east of Long Lane & south Blackthorn Close, Tilehurst* ('Site A'), and *Land east of Sulham Hill between Barefoots Copse & Cornwell Copse, Sulham Hill, Tilehurst* ('Site B'), for residential development. These representations respond specifically to West Berkshire District Council's ('the Council') Regulation 19 consultation on the Local Plan Review (2022 – 2039).
- 2.2 These representations are made within the context of the framework of legal compliance and the tests for soundness within paragraph 35 of the National Planning Policy Framework ('NPPF'); namely, whether the emerging West Berkshire Local Plan (2022 – 2039) is:
- **Positively prepared** – providing a strategy which as a minimum seeks to meet the area's objectively assessed needs.
 - **Justified** – provides an appropriate strategy, taking into account reasonable alternatives and based on proportionate evidence.
 - **Effective** – deliverable over the plan period and based on effective joint working.
 - **Consistent with national policy** – enabling the delivery of sustainable development.
- 2.3 Darcliffe holds specific land interests within West Berkshire District, known as Land to the east of Long Lane & south Blackthorn Close, Tilehurst ('Site A'), and Land east of Sulham Hill between Barefoots Copse & Cornwell Copse, Sulham Hill, Tilehurst ('Site B'). These representations are aligned with these land interests and address topics within the West Berkshire Local Plan Review consultation, and its supporting evidence base, accordingly.
- 2.4 We encourage the Council to reconsider its omission of both sites for residential allocation before proceeding to the Regulation 22 stage of the local plan review. Site Location Plans are provided for both sites at **Appendix 1: Site Location Plans**.

Policy Context

- 2.5 West Berkshire District Council adopted the Core Strategy Development Plan Document (2006 - 2026) in July 2012. Five years later, the Council adopted the Housing Site Allocations Development Plan Document in May 2017: which sought to implement the spatial framework set out within the Core Strategy. The adopted Development Plan for the District therefore sets out the spatial strategy to meet development needs up to 2026, and provides a series of site allocations and planning policies that seek to deliver that strategy.
- 2.6 To ensure that planning policies remain relevant and are able to effectively meet the needs of the local community, the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) requires local planning authorities to review local plans at least once every 5 years from their adoption date.
- 2.7 The Proposed Submission West Berkshire Local Plan Review (2022 – 2039) ('the emerging plan'), which is the subject of the 'Regulation 19' consultation, reflects the distilled outcome of that review process. The Draft Plan sets out an updated vision and strategy, alongside an updated series of site allocations and policies that would supersede the adopted Core Strategy upon its adoption. The Council's Local Development Scheme ('LDS') anticipates its adoption in September 2024.

- 2.8 Darcliffe **fully supports** the Council's commitment to review the existing development plan through this process. However, it is considered that there are several aspects of the emerging plan and its evidence-base, which would benefit from further consideration. These areas are detailed within these representations. We encourage the council to address the concerns we've identified to ensure the emerging plan is capable of being found sound.
- 2.9 To assist in resolving our concerns, Darcliffe are promoting the allocation of:
- Land to the east of Long Lane & south Blackthorn Close, Tilehurst ('Site A'), for approximately 30 homes.
 - Land east of Sulham Hill between Barefoots Copse & Cornwell Copse, Sulham Hill, Tilehurst ('Site B'), for approximately 49 homes.

Land to the east of Long Lane & south Blackthorn Close, Tilehurst ('Site A')

- 2.10 Land to the east of Long Lane & south Blackthorn Close, Tilehurst ('Site A') comprises approximately 1.3 hectares of land adjoining the western extent of Tilehurst, which comprises a suburb of Reading's western extent. The site adjacent to Sulham Hill, forming a vacant field between the road and the existing community that comprises the suburb of Tilehurst.
- 2.11 The site currently comprises an undeveloped agricultural field, which is bordered by established woodland to the north, south and west. Beyond the well-vegetated site boundaries to the north, south, and west lie undeveloped fields within the North Wessex Downs AONB. The site lies entirely within Flood Zone 1 (low flood risk) and has no relevant planning history.
- 2.12 The site was submitted to the Council as part of a Call for Sites exercise, which took place between 2012 - 2013. The site was assessed in the 2013 Strategic Housing Land Availability Assessment ('SHLAA') (site ref: EUA033) as 'potentially developable'. The Council's Housing and Economic Land Availability Assessment ('HELAA'), which succeeded the SLAA and was updated most recently in January 2023, concluded that the site was *potentially available*, but *unsuitable* for residential development within the proposed emerging plan period, largely due to access and landscape considerations.
- 2.13 Darcliffe confirms that the site is immediately *available* for development, is *suitable* for residential development, and is *achievable* with a realistic prospect that development would be delivered on the site within the proposed emerging plan period.
- 2.14 Consequently, Darcliffe contend that the site is deliverable in relation to the provisions set out in Planning Practice Guidance¹. Further detail is provided in Sections 5 and 6 of these representations in relation to the *availability*, *suitability*, and *achievability* of Site A for residential development.
- 2.15 Sections 5 and 6 of these representations demonstrate that the site benefits from being very sustainably located and there are no significant constraints to the development of the site for residential dwellings within the emerging plan period. The development of the site is considered to be achievable whilst conserving and enhancing the special qualities of the AONB, in accordance with proposed Policy SP2: North Wessex Downs AONB.

¹ PPG: Housing and economic land availability assessment. Paragraph: 018 Reference ID: 3-018-20190722.

- 2.16 The development of the site for approximately 30 new homes would contribute toward meeting the district's significant identified housing need in a highly sustainable location, in addition to providing a range of further benefits; including much-needed affordable housing, biodiversity improvements, contributing to meeting Reading's unmet need, the provision of public open space, and financial contributions toward the maintenance of local infrastructure.
- 2.17 Development at this scale is considered to represent an efficient use of the land, whilst respecting the character and setting of the wider landscape in which the site is set. As such, allocation of the site for approximately 30 dwellings would accord with Paragraph 124 of the NPPF, in which it is made clear that 'planning policies and decisions should support development that makes efficient use of land'.
- 2.18 Consequently, Darcliffe encourage the Council to reconsider the omission of the site for residential development and include an allocation of the site for the development of approximately 30 dwellings within the emerging local plan.

Land east of Sulham Hill between Barefoots Copse & Cornwell Copse, Sulham Hill, Tilehurst ('Site B')

- 2.19 Land east of Sulham Hill between Barefoots Copse & Cornwell Copse, Sulham Hill, Tilehurst ('Site B') comprises approximately 2.2 hectares of land adjoining the western extent of Tilehurst, which comprises a suburb of Reading's western extent. The site adjacent to Sulham Hill, forming a vacant field between the road and the existing community that comprises the suburb of Tilehurst.
- 2.20 The site currently comprises an undeveloped agricultural field, which is bordered by established woodland to the north, south and west. Beyond the well-vegetated site boundaries to the north, south, and west lie undeveloped fields within the North Wessex Downs AONB. The site lies entirely within Flood Zone 1 (low flood risk) and has no relevant planning history.
- 2.21 The site was submitted to the Council as part of a Call for Sites exercise, which took place between 2012 - 2013. The site was assessed in the 2013 Strategic Housing Land Availability Assessment ('SHLAA') (site ref: EUA032) as 'potentially developable'. The Council's Housing and Economic Land Availability Assessment ('HELAA'), which succeeded the SLAA and was updated most recently in January 2023, concluded that the site was *potentially available*, but *unsuitable* for residential development within the proposed emerging plan period, largely due to access and landscape considerations.
- 2.22 Darcliffe confirms that the site is immediately available for development, is *suitable* for residential development, and is achievable with a realistic prospect that development would be delivered on the site within the proposed emerging plan period.
- 2.23 Consequently, Darcliffe contend that the site is deliverable in relation to the provisions set out in Planning Practice Guidance². Further detail is provided in Sections 5 and 6 of these representations in relation to the *availability*, *suitability*, and *achievability* of Site B for residential development.

² PPG: Housing and economic land availability assessment. Paragraph: 018 Reference ID: 3-018-20190722.

- 2.24 Sections 5 and 6 of these representations demonstrate that the site benefits from being very sustainably located and there are no significant constraints to the development of the site for residential dwellings within the emerging plan period. The development of the site is considered to be achievable whilst conserving and enhancing the special qualities of the AONB, in accordance with proposed Policy SP2: North Wessex Downs AONB.
- 2.25 The development of the site for approximately 30 new homes would contribute toward meeting the district's significant identified housing need in a highly sustainable location, in addition to providing a range of further benefits; including much-needed affordable housing, biodiversity improvements, contributing to meeting Reading's unmet need, the provision of public open space, and financial contributions toward the maintenance of local infrastructure.
- 2.26 Development at this scale is considered to represent an efficient use of the land, whilst respecting the character and setting of the wider landscape in which the site is set. As such, allocation of the site for approximately 30 dwellings would accord with Paragraph 124 of the NPPF, in which it is made clear that 'planning policies and decisions should support development that makes efficient use of land'.
- 2.27 Consequently, Darcliffe encourage the Council to reconsider the omission of the site for residential development and include an allocation of the site for the development of approximately 30 dwellings within the emerging local plan.

3. THE SCALE OF HOUSING NEED

3.1 This section details Darcliffe's position with regard to the scale of housing need within West Berkshire. In determining the appropriate Housing Requirement for the emerging West Berkshire Local Plan (2022 – 2039), the discussion considers several key themes:

- the scale of housing need in West Berkshire,
- the need for affordable housing in West Berkshire, and
- unmet need arising outside of West Berkshire & the Duty-to-Cooperate.

The Scale of Housing Need in West Berkshire

Calculating Housing Need

3.2 In considering the appropriate housing requirement for the District, the supporting text accompanying emerging Policy SP12: 'Approach to Housing Delivery' identifies that the strategic policies contained within the emerging local plan should be informed by an assessment of Local Housing Need ('LHN').

3.3 The National Planning Policy Framework ('NPPF')³ confirms, at paragraph 61, that:

"...to determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach".

3.4 The Government's Standard Method for calculating housing need is set out clearly in Planning Practice Guidance ('PPG')⁴. Proposed Policy SP12 clarifies that the appropriate LHN figure for West Berkshire comprises 513 dwellings per annum ('dpa), as derived using the Government's Standard Method.

3.5 Furthermore, no exceptional circumstances have been identified that apply to West Berkshire which justify the use of an alternative starting position approach to the Government's Standard Method. Darcliffe **agrees** there are no exceptional circumstances that justify the application of an alternative assessment of housing need that would result in an identified need below that of the Standard Method, in accordance with PPG.

3.6 Darcliffe **supports** the Council's use of the Government's Standard Method to derive a minimum housing need figure for the District area. However, as noted within the emerging local plan, it remains pertinent that the LHN figure represents the minimum identified housing need. It should not be considered to represent a maximum quantum of development to be provided.

³ Available online at:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf.

⁴ Available online at: <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments#identifying-the-need-for-different-types-of-housing>.

- 3.7 PPG clarifies there are various circumstances in which it may be appropriate for an authority to plan for a higher number of homes than indicated through the LHN Standard Method calculation. Such circumstances include, but are by no means limited to, situations in which an authority has agreed "...to take on unmet need from neighbouring authorities, as set out in a statement of common ground"⁵.

Expressing the Housing Requirement

- 3.8 Darcliffe notes it is common practice, indeed best practice, for Local Planning Authorities ('LPAs') to identify a 'buffer' in the identified housing requirement, to ensure at least the minimum local housing needs of the area are more likely to be delivered in practice. Typically, this is represented in the provision of an amount of headroom in the supply over the minimum target, to account for the practical realities that inhibit sites being delivered as anticipated throughout the plan period.
- 3.9 To this end, the Council has identified an approach to its identified housing requirement that reflects a range, between the LHN minimum of 513 dpa to 538 dpa. Within the supporting text to Policy SP12, the Council clarifies that the housing target of 513 dpa represents a minimum housing delivery figure to be achieved, and therefore that it does not represent a cap, or 'maximum' amount. Darcliffe welcome the Council's recognition that the LHN figure of 513 dpa should be exceeded where possible.
- 3.10 Further, the Council assert that the application of a range within the identified housing requirement of an authority's area represents common practice. However, Darcliffe contends that this is not the case. Indeed, the expression of the housing requirement as a range is considered to introduce unnecessary confusion into the planning process and is therefore considered to be inconsistent with the NPPF.
- 3.11 Paragraph 16 of the NPPF requires that local plans should '...contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals'. The expression of a housing requirement that consists of a range between two targets is unnecessarily opaque and introduces entirely unnecessary uncertainty with regard to how the Council's annual housing requirement will be measured and monitored.
- 3.12 For example, the use of a range introduces uncertainty in relation to how the 5% buffer, as required by paragraph 74 of the NPPF, would be applied in considering the Council's Five-Year Housing Land Supply position ('5YHLS').
- 3.13 Given these concerns, Darcliffe recommends the Council seeks to identify a single housing requirement figure, which reflects the LHN figure, plus an appropriate buffer, in the identified housing requirement, that is sufficient to ensure that the District's minimum housing needs will be delivered in practice, providing flexibility in the supply of homes and choice and competition in the market for land.

The Appropriate Buffer in the Housing Requirement

- 3.14 Darcliffe **supports** the Council's recognition that, to be *effective*, the emerging plan must identify a housing requirement, and accompanying housing land supply, which includes an appropriate buffer over the minimum LHN figure of 513 dpa. However, Darcliffe contends the provision of just a 5% buffer over the LHN figure is insufficient to effectively ensure that the District's minimum local housing needs will be delivered in practice.

⁵ *Ibid.* PPG Paragraph: 010 Reference ID: 2a-010-20201216.

- 3.15 Research undertaken by Lichfields in 2015 indicated that approximately 10-20% of all planning permissions granted nationally were not ultimately implemented (excluding re-plans)⁶. Given the typical detractors from the implementation of planning permissions; including market fluctuations, delays in the planning process, legal restrictions, complications with the discharge of conditions, *et al.*, it is entirely reasonable to expect that a certain proportion of the allocated housing supply over a fifteen-year period would either not come forward as the Council's trajectory anticipates, or not be delivered at all.
- 3.16 Consequently, to be *effective*, the emerging plan must seek to identify a buffer of at least 10% above the identified minimum local housing need figure. This is considered to be necessary to ensure that those minimum housing needs can be effectively delivered, in practice, over the length of the emerging plan period.
- 3.17 As such, Darcliffe contends that the Council should amend Policy SP12 accordingly, to reflect a housing requirement figure of 564 dwellings per annum. This reflects the identified minimum housing needs as derived through the Standard Method, plus a 10% buffer to ensure that these needs are delivered in practice. This represents an increase in the identified housing requirement by an additional 442 dwellings over the plan period.
- 3.18 To assist the Council in providing an *effective* and robust housing land supply, Darcliffe recommends that Site A and Site B are allocated for the delivery of approximately 30 and 49 new homes respectively. Together, the sites would provide approximately 1% of the district's total identified housing requirement over the entire plan period, which would help to ensure that the district's housing needs would be met effectively and in a sustainable location.

⁶ Lichfields (2021) Taking Stock: The geography of housing need, permissions and completions. Available online at: https://lichfields.uk/media/6453/taking-stock-the-geography-of-housing-need-permissions-and-completions_may21.pdf.

The Plan Period

- 3.19 Paragraph 22 of the NPPF requires that '*...strategic policies should look ahead over a minimum 15 year period from adoption*'. The Council's proposed plan period runs to 2038/39, which would mean that the plan would need to be adopted in 2023/24 if it is to ensure a full 15 years from the point at which it is adopted. The Council's own Local Development Scheme ('LDS')⁷ anticipates that the emerging plan is at best likely to be adopted in September 2024. Which would provide a plan period covering less than 15 years post adoption.
- 3.20 To redress this, Darcliff recommends the plan-period should be extended by at least 12 months, ending in 2040. This would, in effect, increase the overall housing target by at least 513 dwellings, to cover the additional monitoring year. The council will also need to identify additional supply of new homes to address the plan's extended plan period.
- 3.21 Darcliff recommends that the allocation of both Site A and Site B for approximately 30 and 49 new dwellings respectively could and would make a significant contribution to redressing this additional housing need through the plan period.

Affordable Housing Need in West Berkshire

- 3.22 West Berkshire faces a significant need for affordable housing over the plan period, as affirmed within the emerging local plan. The conclusions of the Berkshire (including South Bucks) SHMA (2016), updated in 2022⁷, further demonstrate the extent of this need in the plan area, finding there is a need within West Berkshire for approximately 330 new affordable homes per annum up to 2039.
- 3.23 The identified need for affordable homes in West Berkshire, of 330 dwellings per annum, comprises approximately 64% of the overall identified housing need for the plan area, of 513 dwellings per annum. To deliver the number of affordable homes needed in West Berkshire, the Plan would be required to identify a housing supply of, at least, 825 dwellings per annum (assuming a policy requirement of 40% affordable housing provision is applied), which represents +160% of the LHN figure.
- 3.24 Given that the identified annual need for affordable housing provision comprises approximately 64% of the overall annual local housing need, there is a clear case for accommodating further residential development, as far as is reasonably practicable, within the District, to promote the delivery of greater affordable housing.
- 3.25 ONS datasets⁹ confirm that the latest median housing affordability ratio (2021) for West Berkshire is 9.73¹⁰. This means that the median house prices in the District are almost 10 times that of median workplace-based earnings. This is up from a ratio of 5.1 in 2000 and 7.3 in 2010, which indicates that homes in West Berkshire have become markedly less affordable over time.
- 3.26 To support the long-term viability of the services and amenities of the District's Eastern Urban Area, such as Tilehurst and the other western suburbs of Reading, there is clearly a need to deliver new market and affordable homes in the area within the plan period. The area comprises the District's highest order settlement and as such represents the most sustainable location to accommodate new development in the District.

⁷ Available online at: https://www.westberks.gov.uk/media/53425/Local-Development-Scheme-January-2023/pdf/Local_Development_Scheme_Jan_2023_clean.pdf?m=638097176540170000.

- 3.27 Given the principal mechanism for the delivery of affordable homes is through the allocation of market housing there is justification for adopting a higher housing requirement, we therefore encourage the Council to consider allocating both Site A and Site B to assist in meeting the identified need for affordable housing in the District. Given a policy compliant mix of homes, the sites are together capable of delivering approximately 32 new much-needed affordable homes.

Unmet Need Arising Outside of West Berkshire & the Duty-to-Cooperate

Unmet Need Arising Outside of West Berkshire

- 3.28 The Government's Standard Method calculation does not take account of unmet need arising from outside the authority's area. However, as noted within the emerging plan, West Berkshire District falls within the Western Berkshire Housing Market Area ('HMA'). Which also comprises Bracknell Forest, Reading Borough, and Wokingham Borough Councils administrative areas.
- 3.29 The Berkshire (including South Bucks) Strategic Housing Market Assessment ('SHMA') (2016)¹¹, published as part of the Council's evidence base, affirms the strong functional relationships exhibited between these local authority areas - in relation to where people live and work. Recognising this, the Western Berkshire HMA authorities have sought to demonstrate a shared history of collaborative working in relation to housing matters and associated infrastructure, which included the preparation of a joint Statement of Common Ground ('SoCG') for the purposes of local plan-making.
- 3.30 Signed by each constituent authority in August 2021, the West of Berkshire Area SoCG¹² recognises that, in the first instance, each authority will seek to meet its own development needs in full. However, the SoCG acknowledges that there is a shortfall in planned residential development in Reading borough of 10 dpa throughout their plan period, equating to a total of 230 net new homes.
- 3.31 Consequently, the authorities have recognised that there is currently a modest identified and agreed-upon quantum of unmet need arising from within the Western Berkshire HMA. In seeking to address this unmet need, the SoCG recognises that this should, in principle, be met within the Western Berkshire area. Given the relatively modest level of unmet need, Darcliff expect that an appropriate contribution should be accommodated within West Berkshire district toward meeting some, if not all, of Reading's unmet need.
- 3.32 The Bracknell Forest Local Plan has recently been subject to examination in public and has not included any additional supply to address the shortfall in Reading. As such, it falls to either Wokingham or West Berkshire to include it within their housing requirement.
- 3.33 Planning Practice Guidance ('PPG') states that "Inspectors will expect to see that strategic policy making authorities have addressed key strategic matters through effective joint working, and not deferred them to subsequent plan updates...". Darcliff maintains therefore that simply pushing consideration of Reading's unmet need back to a subsequent plan update would be inconsistent with national policy and fails to adequately respond to the requirements under the duty to co-operate.
- 3.34 The emerging plan fails to provide any such clear commitment to meeting Reading's unmet need. The Housing Background Paper states that this exercise should be undertaken through the review of the local plan once Reading has clarified the extent of unmet need through its own local plan review.

- 3.35 RBC's unmet need is primarily due to its constrained administrative boundaries, which results in the lack of greenfield sites for development, and noting RBC is now subject to the 30% uplift to the minimum Standard Method OAN, and is substantively reliant on brownfield sites to meet housing needs. As evidenced by the unmet need of their adopted Local Plan, brownfield sites within RBC are diminishing.
- 3.36 Furthermore, the location of the developable sites is predominately central and lend themselves to flatted development. Consequently, RBC will likely be supplying a lack of family homes, alongside likely failing to meet its own OAN minimum needs, within the borough to meet local needs. This further promotes the need for Tilehurst, as a settlement which is located and essentially forms a functional suburb of Greater Reading, to pick up the unmet need for RBC's family homes.
- 3.37 It is also notable RBC's last recorded 5YHLS figure was 5.2 years in 2021, which is less than 2 years after their Local Plan was adopted. This downwards trajectory so early in the plan period clearly indicates their allocated sites are already not delivering at anticipated rates. This assumedly relates to the dependence on brownfield sites which are generally slower to deliver housing in comparison to greenfield sites. As a consequence of RBC's housing trajectory, the 230 home shortfall will likely increase in the next Local Plan Review.
- 3.38 To redress these concerns, Darcliffe recommends West Berks Council reconsider including a specified commitment toward meeting a least the existing identified unmet needs of Reading Borough within the District's housing requirement figure under Policy SP12. Furthermore, in meeting this specified amount of unmet need, Darcliffe recommends that the Council seeks to identify opportunities to deliver it within locations that are functionally linked to the area in which the unmet need arises.
- 3.39 Consequently, we encourage the council to consider the allocation of Site A and Site B. The sites are capable of meeting a reasonable proportion of Reading's unmet need over the entire plan period. They are adjacent to the existing settlement of Reading, so are well-placed to provide for its unmet need in a location that is functionally connected to Reading.

The Duty-to-Cooperate ('the Duty')

- 3.40 Section 33a of the Planning and Compulsory Purchase Act (2004) ('PCPA') requires that local planning authorities should co-operate with other relevant local authorities, the County Council, and prescribed bodies (as relevant), in relation to the preparation of a Local Plan. The Duty requires the Council to engage constructively, actively, and on an on-going basis, in the preparation of the Plan, insofar as it relates to a strategic matter. Strategic Matters include the sustainable development and use of land that has, or would have, a significant impact on at least two planning areas, such as the amount and distribution of housing.
- 3.41 A fundamental requirement of a Local Plan is to meet the area's development needs as well as any needs that cannot be met within neighbouring areas unless there are policies in the Framework that protect areas or assets, or adverse impacts of doing so would significantly and demonstrably outweigh the benefits taken as a whole (NPPF, Paragraph 11). Indeed, Paragraph 35 of the NPPF notes that this is an express requirement of a sound Local Plan.
- 3.42 Furthermore, paragraph 24 of the NPPF is clear that LPAs have a duty to cooperate with each other and with other prescribed bodies, on strategic matters that cross administrative boundaries. The NPPF goes on to note that '*...joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere*'.

- 3.43 The NPPF is clear that the Duty is not simply a bureaucratic exercise but one which should ensure Local Plans are *effective* and *positively prepared*. As such, cooperation clearly relates to maximising the effectiveness of plan preparation.
- 3.44 Importantly, the requirement is to 'cooperate', rather than to just 'communicate', although it is accepted that the Duty to Cooperate is not *de facto* a duty to agree. There is however an expectation that neighbouring authorities will work together to collectively address strategic matters, including meeting housing need.
- 3.45 The Oxford English Dictionary ('OED') definition of *cooperate* is to 'work together to achieve something', whereas the OED definition of *communication* is to 'share or exchange information'. There is a fundamental difference between the two, with the emphasis in cooperation being to achieve something. Engagement alone is therefore insufficient to comply with the Duty.
- 3.46 From review of the signed statement of common ground it appears the HMA authorities have undertaken and satisfied a process of identifying material strategic planning matters. And there has been a process of communication considering the identified strategic matters.
- 3.47 However, we do not consider the arrived at conclusion of not undertaking any action to remedy Reading Borough's unmet need until such time as a future plan review is undertaken satisfies the base expectation and requirement of co-operation. We are also concerned by the apparent lack of ongoing co-operation and engagement. These matters undermine confidence in the effectiveness of the process undertaken in context of the Duty.
- 3.48 Failure of WBDC to properly cooperate with neighbouring authorities and other bodies to meet development needs would therefore result in the emerging Plan being found unsound. It is essential that WBDC fully cooperates with other LPAs to meet Reading's identified unmet housing needs. To redress this issue, Darcliffe encourages the Council to consider the allocation of both Sites A and B to meet a specified proportion of the unmet need arising from Reading.

4. THE SPATIAL DISTRIBUTION OF HOUSING

- 4.1 The NPPF (2021) requires, at paragraph 20, strategic policies should set out an overall strategy for the pattern, scale, and design quality of places. Making sufficient provision for housing and other development needs. Darcliffe welcomes the Council's consideration of alternative options¹³ to develop an appropriate spatial strategy for West Berkshire up to 2039, as detailed within the Sustainability Appraisal that accompanies this iteration of the emerging local plan (SA).
- 4.2 The identified alternative spatial strategy options for the District each seek to direct development toward the most sustainable settlement locations within West Berkshire. Darcliffe **supports** the Council's recognised commitment to maximising development at the most sustainable locations in the District.
- 4.3 However, notwithstanding the direction of development toward the most sustainable settlements, each reasonable alternative spatial strategy option ultimately relies upon the allocation of land within all three Spatial Areas, including the North Wessex Downs AONB, to meet the District's overall housing needs.
- 4.4 As noted within the Housing Background Topic Paper (2023)¹⁴, the North Wessex Downs AONB Spatial Area covers 74% of West Berkshire. Given the various constraints associated with the Newbury and Thatcham Spatial Area (including environmental, flooding, and heritage constraints), and with the Eastern Area Spatial Area (including flooding constraints and the Detailed Emergency Planning Zone), the Council considers that it is not reasonably practicable to accommodate the entire housing need in these areas.
- 4.5 Despite the constraints in these two Spatial Areas, 92% of the residential allocations within the emerging local plan are located in the Newbury and Thatcham and Eastern Area Spatial Areas. Darcliffe generally **supports** the Council's proposed spatial strategy to the extent that development is intended to be directed toward the most sustainable locations.
- 4.6 However, Darcliffe contends that in the implementation of this spatial strategy, the Council have missed opportunities to allocate residential development at appropriate and sustainably located sites within the preferred spatial locations within the District. Darcliffe recommends the Council consider the omission of allocation(s) for residential development at the Sites A and B accordingly, whether in combination or separately.
- 4.7 Importantly, the sites adjoin the highest order settlement within the District, and even within the HMA, being located immediately adjacent to the west of Reading. Furthermore, the sites are located within the District's highest order Spatial Area - the Eastern Area Spatial Area. Both sites clearly therefore relate favourably regarding the Council's identified spatial strategy, which directs development toward the most sustainable locations.
- 4.8 As noted in the Updated Housing Needs Evidence (July 2022) paper, a number of settlements (including Aldermaston, Burghfield and Mortimer) in the southern extent of the Eastern Area are unable to contribute toward meeting local housing need owing to their location within the Atomic Weapons Establishment Detailed Emergency Planning Zone ('AWE DEPZ'). Consequently, this provides an impetus that the remaining settlements of the Eastern Area, such as Tilehurst, should and where appropriate, accommodate the surplus housing needs of this spatial area.

- 4.9 It is also relevant that the omission of the large strategic Grazeley Garden Settlement, allocation (c. 15,000 homes), was a consequence of the AWE DEPZ preventing housing deliverability in the east of the District. This further demonstrates that housing should be reallocated elsewhere within the Eastern Area to fulfil the voided supply of homes, as well as capitalise on the lost supply of potential resource associated with the large functional economic market area that is Reading.
- 4.10 The Settlement Hierarchy Study Paper, which forms part of the evidence base supporting the Local Plan Review, classifies Tilehurst and Purley-on-Thames as an 'Urban Area' which forms highest classification for sustainability. Proposed Policies SP1 and SP3 set out the Spatial Strategy for West Berks and states "*The scale of development proposals will be expected to be relative to the existing or proposed level of facilities and services in the settlement, together with their accessibility*".
- 4.11 Boyer has undertaken an assessment of both sites A and B against the Council's Sustainability Appraisal ('SA') methodology. These assessments are set out in sections 6 and 8 of these representations respectively. The assessments demonstrate that each site scores positively in relation to the SA assessment framework. Given the clear positive score of the site against the Council's SA methodology, Darcliffe contends that the allocation of both sites, whether together or separately, could be achieved consistent with the Council's proposed spatial strategy.
- 4.12 Furthermore, the scale of development that is proposed for each site will assist with the District's housing delivery both in the short-term and over the life of the plan period. In conjunction with the strategic-scale site allocations the Council's identified housing trajectory relies upon, the development of sites at this smaller to medium scale can assist in significantly boosting the supply of housing across the plan period, and specifically within the early part of the plan period.
- 4.13 Paragraph 68 of the NPPF states that local authorities should promote a good mix of sites, with medium-scale sites often able to be built out relatively quickly. This is supported in research conducted by Lichfields¹⁵, which reports that schemes of 500 dwellings or more take on average between 5 to 8.4 years from the validation of an application for outline planning permission to the delivery of the first new home. The consequence being larger sites, such as the proposed strategic allocations, typically only substantively contribute to new housing delivery later on in the plan's lifespan.
- 4.14 For these reasons, Darcliffe recommends that the Council reconsiders the omission of Site A and Site B from allocation for residential development prior to the submission of the plan for examination. Darcliffe confirms that whilst both sites are being promoted within these representations, each site could be allocated and developed independently.

5. SITE A - LAND TO THE EAST OF LONG LANE & SOUTH BLACKTHORN CLOSE, TILEHURST

The Opportunity

- 5.1 The site comprises approximately 1.3ha of land providing the opportunity to deliver approximately 30 much needed new homes. A Site Location Plan is provided at **Appendix 1**.
- 5.2 Development of the site will provide a mix of housing in line with national and local policy. A range of house types, sizes and tenures are envisaged in order to maximise the effective and efficient use of the site and to meet the accommodation needs of a variety of household types.
- 5.3 The site is sustainably located in terms of access to local facilities, amenities and public transportation links to the centre of Reading. The site would also represent a logical extension to the western boundary of the built up area of Tilehurst, up to Sulham Woods.
- 5.4 A detailed assessment of the site's deliverability is set out in **Appendix 2**, however to summarise, the site itself is mostly unconstrained and forms mostly developable land. Vehicular access points are available at multiple locations along Long Lane. Furthermore, there is ample space to mitigate impacts and work around the Tree Preservations Orders ('TPO's'), Root Protection Areas ('RPA's'), Ancient Woodland and Local Wildlife Area to the west of the site, through the means of green and blue infrastructure.
- 5.5 The 2023 HELAA under ref. TIL14, however, identified the site 'not to be developable within the next 15 years' owing to concerns surrounding impacts on highways, the North Wessex Downs AONB and local landscape sensitivity. **Appendix 2** forms a detailed assessment of the sites suitability in relation to these matters, drawing upon evidence set out in technical reports. **Appendix 4 - Transport and Access Appraisal Report**, directly addresses the HELAA highways concerns.
- 5.6 The site is in the control of Darcliffe and, if allocated, is envisaged would be capable of delivering sustainable development within the first 5-years of the LPR's plan period.

6. SITE A - SUSTAINABILITY APPRAISAL (SA) / STRATEGIC ENVIRONMENTAL ASSESSMENT (SEA)

- 6.1 The Sustainability Appraisal ('SA') / Strategic Environmental Assessment ('SEA') forms a core part of the evidence base underpinning the Local Plan.
- 6.2 The LPR has identified a number of new residential site options following the Housing and Economic Land Availability Assessment ('HELAA') which rejects a number of sites that the council deems to be unsuitable based on the available evidence.
- 6.3 At Appendix 8b, the SA/SEA makes an assessment of each of the new residential site options which are not deemed to be unsuitable.
- 6.4 Site A (HELAA Ref. TIL 14) was assessed in the HELAA as '*not be developable within the next 15 years*' and therefore not assessed in the SA/SEA. However, as set out in section 5, technical work has been undertaken to demonstrate how the concerns raised in the HELAA can be overcome.
- 6.5 As such, the SA/SEA assessment is replicated (below) at Table 1, which is accompanied by an equivalent assessment made by Darcliffe alongside summarised commentary.
- 6.6 The scoring system also replicates that used in the SA/SEA, as follows.

| | | | | |
|--|-----------------------------------|---------|---|--|
| ++ | + | 0 | - | -- |
| Strongly support sustainability objectives | Support sustainability objectives | Neutral | Works against sustainability objectives | Works strongly against sustainability objectives |

Table 1 – Appraisal of Land west of Little Heath Road

| SA Objective | SA Sub-Objective | Effects of Policy on SA Objectives | Justification for Assessment | Mitigation / Enhancement | Comment |
|--|--|------------------------------------|--|--|---|
| 9: To reduce emissions contributing to climate change and ensure adaptation measures are in place to respond to climate change. | 9(a): To reduce West Berkshire's contribution to greenhouse gas emissions | 0 | An allocation policy would be proposed which requires the proposal to meet 'Future Homes Standards', meaning the development would be 'Net Zero Ready' once the grid can accommodate such standards. | | The development would have a neutral impact on greenhouse gas emissions, through mitigation. |
| | 9(b): To sustainably manage flood risk to people, property and the environment | 0/+ | The site is not affected by a fluvial flood risk area, however, in terms of surface water flooding, there is a small area medium risk in the southern wooded area and area of low risk along | Provision of Sustainable Urban Drainage Systems that also benefit ecology and landscaping. | The development would have a neutral impact on flood risk, through mitigation, whilst enhancing landscape |

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| | | | the northern boundary. The northern extent of Long Lane also has a high risk area. An allocation policy would require a flood risk assessment and necessary mitigation measures to be provided. | | features and local ecology. |
| 1: To enable provision of housing to meet identified need in sustainable locations | 1(a): To maximise the provision of affordable housing to meet identified need | + | The development would have a positive impact on the provision of affordable housing as it is of a scale to provide affordable housing in line with the draft policy requirement of 40% for greenfield sites. | | The development would have a positive impact on social sustainability due to the provision of additional housing to meet local needs. |
| | 1(b): To enable provision of housing to meet all sectors of the community, including those with specialist requirements | + | The development would have a positive impact on provision of a range of housing tenures and sizes in line with draft policy requirements. Proposed homes would also meet accessibility standards in line with current building regulations. | | The development would have a positive impact on social sustainability due to the provision ranging tenure, sized and accessible housing types to meet local needs. |
| 2: To improve health, safety and wellbeing and reduce inequalities | 2(a): To support healthy, active lifestyles | 0/+ | The site is in a sustainable for location for future residents and development will contribute towards local services/infrastructure through CIL and S106 contributions. An allocation policy for the provision of on-site public open space would be required. Pedestrian and cycle facilities within the site would be provided and increase opportunities for active travel. | | The development would have a positive impact on social and environmental sustainability through the provision of walking and cycling routes, good design, provision of green infrastructure and off-site contributions. |
| | 2(b): To reduce levels | + | Good design required by policy should | | |

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| | and fear of crime and anti-social behaviour | | ensure levels and fear of crime and anti-social behaviour are minimised. Darcliffe are committed to meeting guidance set out in 'Designing out Crime' standards. | | |
| | 2(c): To enable the protection and enhancement of high quality multifunctional GI across the District | + | An allocation policy would make reference to a minimum GI requirement. | Policies in the plan requires GI to be considered, therefore, the overall impact would be positive. | |
| 3: To improve accessibility to community infrastructure | 3(a): To improve access to education, health and other services | 0 | The development would not directly impact on access to community facilities. However, the site is located in a sustainable location and CIL/S106 contributions would benefit these services. | | An allocation policy is likely to have a neutral impact on all elements of sustainability. Other policies in the plan will result in a positive impact on social sustainability in relation to provision of IT facilities |
| | 3(b): To support the development of access to IT facilities including Broadband particularly in rural locations | 0 | The development would not impact on access to IT facilities. | Full access to Fibre is required in Building Regulations. | |
| 4: To promote and maximise opportunities for all forms of safe and sustainable travel. | 4(a): To reduce accidents and improve safety | + | An allocation policy would specify access arrangements to ensure safe entry/exit from the site. | | The development, in combination with other policies will have a positive impact on economic and social sustainability through ensuring safe access and opportunities for walking, cycling and public transport. |
| | 4(b): To increase opportunities for walking, cycling and use of public transport | 0/+ | The development would incorporate and improve the PRoW which runs along the north eastern boundary of the site. The development would also improve linkages of Tilehurst to Sulham Woods and the AONB. | | |
| 5: Ensure that the character and distinctiveness of the natural, built and historic | 5(a): To conserve and enhance the biodiversity and geodiversity | + | The development would require consideration of biodiversity through survey work, appropriate avoidance and | Other policies in the plan require consideration of biodiversity (net gain) and geodiversity. | The development would have a positive impact on environmental sustainability. |

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| environment is conserved and enhanced. | of West Berkshire | | mitigation measures. The Government has proposed to introduce a requirement for a minimum of +10% Biodiversity Net Gain. Therefore, there will be a positive gain. | | Other policies in the plan would result in a positive impact if delivered. |
| | 5(b): To conserve and enhance the character of the landscape | 0 | The development would require consideration of the landscape, with appropriate mitigation sensitive design to be considered to ensure a positive impact. | Other policies in the plan also require consideration of the landscape. | |
| | 5(c): To protect or, conserve and enhance the built and historic environment to include sustaining the significant interest of heritage assets | 0 | The policy is unlikely to impact on the built and historic environment. | Other policies in the plan requires consideration of heritage and archaeology. | |
| 6: To protect and improve air, water and soil quality, and minimise noise levels throughout West Berkshire. | 6(a): To reduce air pollution | 0 | The allocation policy would require an air quality survey and necessary mitigation measures to be provided. | Other policies in the plan would ensure that air quality is fully considered. | The development is likely to have a mostly neutral impact on environmental sustainability as a result of the other plan policy requirement to consider air, water, soil and noise. |
| | 6(b): To manage noise levels | 0 | The development would be unlikely to impact on noise levels. | Other policies in the plan would ensure that noise levels are fully considered. | |
| | 6(c): To maintain and improve soil quality | 0 | The development would be unlikely to impact on soil quality. | | |
| | 6(d): To maintain and improve water quality | + | The allocation policy would require consideration of water supply and drainage which should at least maintain if not improve water quality. | | |
| 7: To promote and improve the efficiency of land use. | 7(a): To maximise the use of previously developed land and buildings where appropriate | 0 | The development would not impact on the use of PDL. | | The development is likely to have a positive impact on social sustainability by making the best and most |
| | 7(b): To apply sustainable | + | The allocation policy would set an | | |

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| | densities of land use appropriate to location and setting. | | appropriately ranged dwelling per hectare requirement. | | efficient use of the site. |
| 8: To reduce consumption and waste of natural resources and manage their use efficiently. | 8(a): To reduce energy use and promote the development and use of sustainable /renewable energy technologies, generation and storage | + | The allocation policy would require that efficient use of sustainable technologies, resources, materials and solar gain are proposed. | | The site is likely to have a neutral impact on environmental and economic sustainability through the promotion of renewable technologies. |
| | 8(b): To reduce waste generation and disposal in line with the waste hierarchy and reuse of materials | 0 | The development itself is unlikely to impact on waste generation beyond standard policy requirements. | | |
| | 8(c): To reduce water consumption and promote reuse | + | An allocation policy would require consideration of water supply and drainage which could give scope to reducing water consumption and opportunities for reuse. | | |
| | 8(d): To reduce the consumption of minerals and promote reuse of secondary materials | ? | The allocation policy would include a requirement for the consideration of mineral safeguarding as the site is within an MSA. | | |
| 10: To support a strong, diverse and sustainable | 10(a): To encourage a range of employment opportunities that meet the needs of the District | 0 | The policy is unlikely to impact on employment opportunities. | | The site is likely to have a neutral impact on economic sustainability as it does not deliver economic development. However, the provision of new homes will help to support the economy in an indirect way. |

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| | 10(b): To support key sectors and utilise employment land effectively and efficiently | 0 | The policy is unlikely to impact on employment land. | | |
| | 10(c): To support the viability and vitality of town and village centres | 0 | The policy will not directly impact on the viability and vitality of town and village centres. | | |
| Overall Effect: | Likelihood: | Scale: | Duration: | Timing: | |
| Neutral to Positive | High | Local (Tilehurst) | Permanent | Long Term | |

6.7 To summarise, the development site would likely have an overall neutral to positive impact on sustainability. Positive impacts have been identified in relation to all types of sustainability. Social sustainability as the site seeks to set out the requirements for a ranging typology of new houses on the site (of which 40% would be affordable), as well as requirements for good access routes to local services and facilities. Impacts on environmental sustainability are likely to be positive as a potential policy would set out the measures required to protect and enhance biodiversity and provide development that is conscious of climate change impacts. Economic sustainability would benefit from new development in a sustainable location where there is good access to services and facilities including employment opportunities. No negative sustainability impacts have been identified.

7. SITE B - LAND TO THE EAST OF LONG LANE & SOUTH BLACKTHORN CLOSE, TILEHURST

The Opportunity

- 7.1 The site comprises approximately 2.2ha of land providing the opportunity to deliver approximately 49 much needed new homes. A Site Location Plan is provided at **Appendix 1**.
- 7.2 Development of the site will provide a mix of housing in line with national and local policy. A range of house types, sizes and tenures are envisaged in order to maximise the effective and efficient use of the site and to meet the accommodation needs of a variety of household types.
- 7.3 The site is sustainably located in terms of access to local facilities, amenities and public transportation links to the centre of Reading. The site would also represent a logical extension to the western boundary of the built up area of Tilehurst, up to Sulham Woods.
- 7.4 A detailed assessment of the site's deliverability is set out in **Appendix 3**, however to summarise, the site itself is mostly unconstrained and forms mostly developable land. Vehicular access points are available at multiple locations along Long Lane. Furthermore, there is ample space to mitigate impacts and work around the TPO's, RPA's, Ancient Woodland and Local Wildlife Area to the north, west and south of the site, through the means of green and blue infrastructure.
- 7.5 The 2023 HELAA under ref. TIL15, however, identified the site 'not to be developable within the next 15 years' owing to concerns surrounding impacts on the North Wessex Downs AONB and local landscape sensitivity. **Appendix 2** forms a detailed assessment of the sites suitability in relation to these matters, drawing upon evidence set out in technical reports. **Appendix 5 - Transport and Access Appraisal Report**, directly addresses the HELAA's highway concerns.
- 7.6 The site is in the control of Darcliffe and, if allocated, is envisaged would be capable of delivering sustainable development within the first 5-years of the LPR's plan period.

8. SITE B - SUSTAINABILITY APPRAISAL (SA) / STRATEGIC ENVIRONMENTAL ASSESSMENT (SEA)

- 8.1 The Sustainability Appraisal ('SA') / Strategic Environmental Assessment ('SEA') forms a core part of the evidence base underpinning the Local Plan.
- 8.2 The LPR has identified a number of new residential site options following the Housing and Economic Land Availability Assessment ('HELAA') which rejects a number of sites that the council deems to be unsuitable based on the available evidence.
- 8.3 At Appendix 8b, the SA/SEA makes an assessment of each of the new residential site options which are not deemed to be unsuitable.
- 8.4 Site A (HELAA Ref. TIL 15) was assessed in the HELAA as '*not be developable within the next 15 years*' and therefore not assessed in the SA/SEA. However, as set out in section 7 and Appendix 3, technical work has been undertaken to demonstrate how the concerns raised in the HELAA can be overcome.
- 8.5 As such, the SA/SEA assessment is replicated (below) at Table 1, which is accompanied by an equivalent assessment made by Darcliffe alongside summarised commentary.
- 8.6 The scoring system also replicates that used in the SA/SEA, as follows.

| | | | | |
|--|-----------------------------------|---------|---|--|
| ++ | + | 0 | - | -- |
| Strongly support sustainability objectives | Support sustainability objectives | Neutral | Works against sustainability objectives | Works strongly against sustainability objectives |

Table 1 – Appraisal of Land west of Little Heath Road

| SA Objective | SA Sub-Objective | Effects of Policy on SA Objectives | Justification for Assessment | Mitigation / Enhancement | Comment |
|--|--|------------------------------------|--|--|---|
| 9: To reduce emissions contributing to climate change and ensure adaptation measures are in place to respond to climate change. | 9(a): To reduce West Berkshire's contribution to greenhouse gas emissions | 0 | An allocation policy would be proposed which requires the proposal to meet 'Future Homes Standards', meaning the development would be 'Net Zero Ready' once the grid can accommodate such standards. | | The development would have a neutral impact on greenhouse gas emissions, through mitigation. |
| | 9(b): To sustainably manage flood risk to people, property and the environment | 0/+ | The site is not affected by a fluvial flood risk area, however, in terms of surface water flooding, the southern strip of the site forms low to high risk surface water flooding. An | Provision of Sustainable Urban Drainage Systems that also benefit ecology and landscaping. | The development would have a neutral impact on flood risk, through mitigation, whilst enhancing landscape |

| | | | | | |
|---|---|-----|---|--|---|
| | | | allocation policy would require a flood risk assessment and necessary mitigation measures to be provided. | | features and local ecology. |
| 1: To enable provision of housing to meet identified need in sustainable locations | 1(a): To maximise the provision of affordable housing to meet identified need | + | The development would have a positive impact on the provision of affordable housing as it is of a scale to provide affordable housing in line with the draft policy requirement of 40% for greenfield sites. | | The development would have a positive impact on social sustainability due to the provision of additional housing to meet local needs. |
| | 1(b): To enable provision of housing to meet all sectors of the community, including those with specialist requirements | + | The development would have a positive impact on provision of a range of housing tenures and sizes in line with draft policy requirements. Proposed homes would also meet accessibility standards in line with current building regulations. | | The development would have a positive impact on social sustainability due to the provision ranging tenure, sized and accessible housing types to meet local needs. |
| 2: To improve health, safety and wellbeing and reduce inequalities | 2(a): To support healthy, active lifestyles | 0/+ | The site is in a sustainable for location for future residents and development will contribute towards local services/infrastructure through CIL and S106 contributions. An allocation policy for the provision of on-site public open space would be required. Pedestrian and cycle facilities within the site would be provided and increase opportunities for active travel. | | The development would have a positive impact on social and environmental sustainability through the provision of walking and cycling routes, good design, provision of green infrastructure and off-site contributions. |
| | 2(b): To reduce levels and fear of crime and anti-social behaviour | + | Good design required by policy should ensure levels and fear of crime and anti-social behaviour are minimised. Darcliffe are committed to | | |

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|---|---|-----|--|---|---|
| | | | meeting guidance set out in 'Designing out Crime' standards. | | |
| | 2(c): To enable the protection and enhancement of high quality multifunctional GI across the District | + | An allocation policy would make reference to a minimum GI requirement. | Policies in the plan requires GI to be considered, therefore, the overall impact would be positive. | |
| 3: To improve accessibility to community infrastructure | 3(a): To improve access to education, health and other services | 0 | The development would not directly impact on access to community facilities. However, the site is located in a sustainable location and CIL/S106 contributions would benefit these services. | | An allocation policy is likely to have a neutral impact on all elements of sustainability. Other policies in the plan will result in a positive impact on social sustainability in relation to provision of IT facilities |
| | 3(b): To support the development of access to IT facilities including Broadband particularly in rural locations | 0 | The development would not impact on access to IT facilities. | Full access to Fibre is required in Building Regulations. | |
| 4: To promote and maximise opportunities for all forms of safe and sustainable travel. | 4(a): To reduce accidents and improve safety | + | An allocation policy would specify access arrangements to ensure safe entry/exit from the site. | | The development, in combination with other policies will have a positive impact on economic and social sustainability through ensuring safe access and opportunities for walking, cycling and public transport. |
| | 4(b): To increase opportunities for walking, cycling and use of public transport | 0/+ | The development would incorporate and improve the PRoW which runs along the eastern boundary of the site. The development would also improve linkages of Tilehurst to Sulham Woods and the AONB. | | |
| 5: Ensure that the character and distinctiveness of the natural, built and historic environment is conserved and enhanced. | 5(a): To conserve and enhance the biodiversity and geodiversity of West Berkshire | + | The development would require consideration of biodiversity through survey work, appropriate avoidance and mitigation measures. The Government has proposed to introduce a requirement for a minimum of +10% | Other policies in the plan require consideration of biodiversity (net gain) and geodiversity. | The development would have a positive impact on environmental sustainability. Other policies in the plan would result in a positive |

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|--|--|---|--|---|--|
| | | | Biodiversity Net Gain. Therefore, there will be a positive gain. | | impact if delivered. |
| | 5(b): To conserve and enhance the character of the landscape | 0 | The development would require consideration of the landscape, with appropriate mitigation sensitive design to be considered to ensure a positive impact. | Other policies in the plan also require consideration of the landscape. | |
| | 5(c): To protect or, conserve and enhance the built and historic environment to include sustaining the significant interest of heritage assets | 0 | The policy is unlikely to impact on the built and historic environment. | Other policies in the plan requires consideration of heritage and archaeology. | |
| 6: To protect and improve air, water and soil quality, and minimise noise levels throughout West Berkshire. | 6(a): To reduce air pollution | 0 | The allocation policy would require an air quality survey and necessary mitigation measures to be provided. | Other policies in the plan would ensure that air quality is fully considered. | The development is likely to have a mostly neutral impact on environmental sustainability as a result of the other plan policy requirement to consider air, water, soil and noise. |
| | 6(b): To manage noise levels | 0 | The development would be unlikely to impact on noise levels. | Other policies in the plan would ensure that noise levels are fully considered. | |
| | 6(c): To maintain and improve soil quality | 0 | The development would be unlikely to impact on soil quality. | | |
| | 6(d): To maintain and improve water quality | + | The allocation policy would require consideration of water supply and drainage which should at least maintain if not improve water quality. | | |
| 7: To promote and improve the efficiency of land use. | 7(a): To maximise the use of previously developed land and buildings where appropriate | 0 | The development would not impact on the use of PDL. | | The development is likely to have a positive impact on social sustainability by making the best and most efficient use of the site. |
| | 7(b): To apply sustainable densities of land use appropriate to location and setting. | + | The allocation policy would set an appropriately ranged dwelling per hectare requirement. | | |

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| 8: To reduce consumption and waste of natural resources and manage their use efficiently. | 8(a): To reduce energy use and promote the development and use of sustainable /renewable energy technologies, generation and storage | + | The allocation policy would require that efficient use of sustainable technologies, resources, materials and solar gain are proposed. | | The site is likely to have a neutral impact on environmental and economic sustainability through the promotion of renewable technologies. |
| | 8(b): To reduce waste generation and disposal in line with the waste hierarchy and reuse of materials | 0 | The development itself is unlikely to impact on waste generation beyond standard policy requirements. | | |
| | 8(c): To reduce water consumption and promote reuse | + | An allocation policy would require consideration of water supply and drainage which could give scope to reducing water consumption and opportunities for reuse. | | |
| | 8(d): To reduce the consumption of minerals and promote reuse of secondary materials | ? | The allocation policy would include a requirement for the consideration of mineral safeguarding as the site is within an MSA. | | |
| 10: To support a strong, diverse and sustainable | 10(a): To encourage a range of employment opportunities that meet the needs of the District | 0 | The policy is unlikely to impact on employment opportunities. | | The site is likely to have a neutral impact on economic sustainability as it does not deliver economic development. However, the provision of new homes will help to support the economy in an indirect way. |
| | 10(b): To support key sectors and utilise employment land | 0 | The policy is unlikely to impact on employment land. | | |

| | | | | | |
|------------------------|--|-------------------|--|----------------|--|
| | effectively and efficiently | | | | |
| | 10(c): To support the viability and vitality of town and village centres | 0 | The policy will not directly impact on the viability and vitality of town and village centres. | | |
| Overall Effect: | Likelihood: | Scale: | Duration: | Timing: | |
| Neutral to Positive | High | Local (Tilehurst) | Permanent | Long Term | |

8.7 To summarise, the development site would likely have an overall neutral to positive impact on sustainability. Positive impacts have been identified in relation to all types of sustainability. Social sustainability as the site seeks to set out the requirements for a ranging typology of new houses on the site (of which 40% would be affordable), as well as requirements for good access routes to local services and facilities. Impacts on environmental sustainability are likely to be positive as a potential policy would set out the measures required to protect and enhance biodiversity and provide development that is conscious of climate change impacts. Economic sustainability would benefit from new development in a sustainable location where there is good access to services and facilities including employment opportunities. No negative sustainability impacts have been identified.

9. DEVELOPMENT MANAGEMENT POLICIES

- 9.1 The comments set out in this section are intended to assist the Council in developing an approach that is consistent with national planning policies and the tests of soundness. Where possible, suggested amendments have been set out in the response.
- 9.2 Darcliffe broadly supports the objectives of the West Berkshire Local Plan Review (2022 - 2039) but advises that the Council reconsider the omission of site allocations for residential development at Sites A and B, to ensure that the plan can be found *sound* at the Examination in Public.
- 9.3 As a general principle, the plan would benefit from consistent numbering, in relation to the paragraphs, policy criteria, and sub-criteria. This would assist the accessibility and the useability of the draft plan, improving the effectiveness of the document substantially.

Policy SP7: Design Quality

- 9.4 Reference within this policy to 'relevant community planning documents' is problematic, as the phrase is not considered to relate to any specific identified set of considerations. It is recommended that the second paragraph of this policy is amended in accordance with the below:
- i) Development proposals will be expected to show how they have responded positively to both national and local design guidance. At a national level this includes the characteristics of a well-designed place as set out in the National Design Guide (2021), or as superseded, and at a local level, this includes neighbourhood plans and relevant material considerations ~~community planning documents~~ that identify the local character and distinctiveness of an area which is valued by local communities.

Policy SP8: Landscape Character

- 9.5 As currently formulated, the policy requires that all development, of any scale, would need to be supported by an appropriate landscape assessment. This is considered to be unduly burdensome on minor forms of development and may not be appropriate in all cases where major development is proposed. To introduce greater flexibility within the policy and avoid unnecessary delays further in the planning process, the following amendments are recommended:
- i) Where appropriate, ~~P~~proposals for development major should be accompanied by an appropriate landscape assessment carried out in accordance with the current guidance from the Landscape Institute and Institute of Environmental Management & Assessment.

Policy SP10: Green Infrastructure

- 9.6 To avoid introducing potential delays in the planning process, it is recommended that additional clarification is necessary to support the final paragraph of this policy, in accordance with the below:

- i) Proposals involving the loss of green or blue spaces and other natural features will not be supported unless there is no longer a need for the existing infrastructure or an alternative is provided to meet the local needs that is both accessible and of equal or greater quality and benefit to the community at the time of the determination of any planning application (with the exception of Reserved Matters where details of appropriate green infrastructure provision may be fixed as part of the outline planning permission).

Policy SP11: Biodiversity and Geodiversity

- 9.7 To future-proof the policy, it is recommended that additional wording is included to provide for greater flexibility in the use of an appropriate metric to measure Biodiversity Net Gains which is not specifically the current metric developed by Natural England:

- ii) All proposals should demonstrate a minimum biodiversity net gain of 10% via a Biodiversity Net Gain Plan using the most up-to-date an appropriate biodiversity accounting metric, either developed by Natural England or an agreed alternative, and provide details of the long-term maintenance and management of the net gain. This should be delivered on site in the first instance, or through biodiversity off setting where appropriate.

Policy SP12: Approach to Housing

- 9.8 In accordance with the discussion set out previously, Darcliff recommends that the housing requirement is clearly expressed as a single value, which includes at least a 10% buffer over the Local Housing Need figure. Furthermore, Darcliff recommends that Policy SP12 is amended to clarify a specific contribution to meeting the identified unmet need arising from Reading.
 - i) Provision will be made for ~~8,721 to 9,146~~ 9,588 net additional homes in West Berkshire for the period 1 April 2022 to 31 March 2039; ~~513 to 538~~ 564 dwellings per annum. The target figure of ~~538~~ 564 dwellings per annum does not constitute a ceiling or cap to development. The target includes the provision of 230 dwellings toward meeting the unmet need arising from Reading borough, which is to be accommodated as close to the Eastern Urban Area as possible.
- 9.9 Furthermore, as currently formulated, the proposed policy limits the exception to the net loss of residential units (i.e., where there is a reasoned justification in the form of a benefit to the wider community) to situations in which there is a change of use.
- 9.10 There are situations in which the public benefit of a net loss of residential units could be justified without a change of use occurring; for example, where an outdated apartment building is to be demolished and replaced to provide improved accommodation (e.g., larger units which meet Nationally Described Space Standards and address current housing needs). As such, the following amendment to the policy is recommended:
 - i) There should be no net losses from the existing stock of homes in West Berkshire. Existing homes should be retained in residential use (or replaced at least in equal numbers, normally on the proposed site), unless there is a reasoned justification in the form of a benefit to the wider community ~~for a change of use~~. Developments should utilise opportunities to make better use of the existing housing stock.

Policy SP14: Sites allocated for residential and mixed-use development in the Eastern Area

- 9.11 Darcliffe recommends the inclusion of site allocations for residential development at 'Land to the east of Long Lane & south Blackthorn Close, Tilehurst', and 'Land east of Sulham Hill between Barefoots Copse & Cornwell Copse, Sulham Hill, Tilehurst', under new policies 'RSA24' and 'RSA25'.

| LPR Policy | Current Policy Ref | Site name | Approx no's |
|---------------|--------------------|--|-------------|
| [...] | [...] | [...] | [...] |
| <u>RSA 24</u> | | <u>Land to the east of Long Lane & south Blackthorn Close, Tilehurst</u> | <u>30</u> |
| <u>RSA 25</u> | | <u>Land east of Sulham Hill between Barefoots Copse & Cornwell Copse, Sulham Hill, Tilehurst</u> | <u>49</u> |

Policy SP18: Housing Type and Mix

- 9.12 Delivery of dwellings to M4(3) standard may not be reasonably practicable in all cases. To provide for greater flexibility to examine planning applications on a case-by-case basis, thereby improving the effectiveness of the policy, the following amendments are recommended:
- ii) Around 10% of the new market housing and a maximum of 5 units of the affordable ~~sector~~ homes delivered on-site should also meet the wheelchair accessible standard M4(3) wheelchair user dwellings unless evidence clearly demonstrates that this would make the scheme unviable or would be unfeasible to deliver.

Policy SP24: Infrastructure and Delivery

- 9.13 To improve the effectiveness of the policy and to avoid potential unnecessary delays in the planning process, reference should be made within the policy to the need for any contributions required to the delivery of relevant infrastructure to be consistent with the tests at Section 122 of the Community Infrastructure Levy Regulations (2010) (as amended).

Policy DM40: Public Open Space

- 9.14 Paragraph 12.87 of the supporting text to Policy DM40 provides that "Public open space should be genuinely available in perpetuity to the public at large. The Council will normally seek the transfer of public open space areas into local authority ownership/control in a condition appropriate for such use, and together with a reasonable sum for their ongoing maintenance".
- 9.15 Darcliffe supports the Council in seeking to ensure that public open space is genuinely available in perpetuity to the public at large. However, it would not be practical or desirable for the Council to take transfer of all areas of public open space (particularly where these areas are smaller in scale) and in certain circumstances it may be preferable that these are not transferred.

- 9.16 Accordingly, we would propose that the supporting text is revised to make more explicit allowance for such circumstances e.g. "However, it is recognised that in some instances it may not be practical or desirable for the public open space to be transferred and these situations will be assessed on a case by case basis".

Policy DM44: Parking

- 9.17 To ensure that the policy remains effective over the length of the plan period, it is recommended that additional wording is included to clarify that development proposals would be required to meet the most up to date standards where relevant:
- iii) Cycle and motorcycle parking should be provided in accordance with the Council's 'Cycling and Motorcycling Advice and Standards for New Development', or such other standards as may be prepared. This sets out design standards and expected levels of provision for different types of development.

10. CONCLUSION

- 10.1 The Proposed Submission West Berkshire Local Plan Review (2022 – 2039) sets out how West Berkshire District Council proposes to, as a minimum, meet identified development needs within the district area. The proposed spatial strategy seeks to direct development toward the most sustainable locations within the district.
- 10.2 To this extent, Darcliffe **supports** the Council's principal objectives; which include meeting the district's local housing needs in full, and directing required development toward the most sustainable locations within the district. However, Darcliffe has concerns in relation to certain aspects of the plan, which we encourage the Council to consider amending prior to submission for examination in public. These include: increasing the level of headroom provided in the identified housing requirement, allocating a specified amount of development to accommodate unmet need arising in Reading, and updating the proposed plan period to include an additional year.
- 10.3 In meeting the district's identified housing needs, Darcliffe recommends the Council reconsider the omission of allocations for residential development at:
- Land to the east of Long Lane & south Blackthorn Close, Tilehurst ('Site A'), for approximately 30 homes.
 - Land east of Sulham Hill between Barefoots Copse & Cornwell Copse, Sulham Hill, Tilehurst ('Site B'), for approximately 49 homes.
- 10.4 Darcliffe considers that the allocation of these sites, whether in combination or separately, could accommodate approximately 79 new dwellings in total, providing a policy-compliant development in one of the most sustainable locations in the district.
- 10.5 The sites lie within highly sustainable locations, with strong functional links to Reading. As such, the sites are well-positioned to effectively meet a reasonable proportion of the identified unmet need arising from Reading. Furthermore, the development of the sites could provide a reasonable contribution to ensuring that West Berkshire's identified housing needs can be met, including the provision of approximately 32 much-needed affordable homes (assuming a contribution of 40% in line with emerging Policy SP19).
- 10.6 There are no significant constraints to the development of either site. Darcliffe is committed to bringing forward the development of new homes on these sites through high-quality, well-designed schemes. The sites are both located within practical walking and cycling distance from the services and amenities within Tilehurst, and are well-connected to the main settlement of Reading, which provides further linkages to London and other key settlements.
- 10.7 Darcliffe is able to confirm that both sites are *available* for development now, represent *suitable* locations for development, and that the development of both sites, whether in combination or separately, is *achievable* with a realistic prospect that housing can be delivered within the first five years of the draft plan period. The sites are *deliverable* and should therefore be favourably regarded in relation to their potential allocation for residential development within the emerging West Berkshire Local Plan.
- 10.8 We look forward to continuing to work with West Berkshire District Council, Tilehurst Parish Council, and the wider community to provide much-needed new housing in this community.

APPENDIX 1 – SITE LOCATION PLAN



APPENDIX 2 – DETAILED ASSESSMENT OF 'SITE A'S' DELIVERABILITY

The Site

- 10.10 At approximately 1.3ha, the site comprises grazing land which gently slopes down towards the southeast. Dense woodland borders the site on all sides with the exception of the northeast which is in view of properties along Blackthorne Close which form start of the built up residential area of Tilehurst. The southern 0.4ha of the site comprises dense woodland and a pond.
- 10.11 An existing agricultural access is located at the south of the site at the junction of Long Lane and Sulham Hill.
- 10.12 The local services/facilities near the site include:
- 16 Sky bus route is located along Dark Lane (200m from the site) and runs 7 days a week, from 5am to 11pm Monday-Saturday, every 30 mins. Sundays have a slightly reduced service. The service links to Reading town centre and the main train station (all distances measured in this document are at a straight line). Further details relating to access are set out in **Appendix 4 – Transport and Access Appraisal Report for Site A**.
 - Nurseys, Pre Schools, Primary Schools and Secondary Schools are located with 1km of the site.
 - A recreational park with a football pitch, playground, cricket pitch and skatepark within a 1-minute walk.
 - Several additional services, including convenience stores, sports centre, playgrounds, takeaways, post office, pharmacy, retail units, pubs and a sports centre within 1-1.5km or short bus journey/drive.

Policy Designations

- The site is located adjacent to the North Wessex Downs AONB.
- The site is located within the countryside, adjacent to the settlement boundary of Tilehurst.
- There is a group TPO on the western boundary, along part of the PROW.
- The majority of woodland to the south is subject to a group TPO.
- The access is not constrained by a TPO.
- PROW TILE/17/1 runs along the south of the site.
- The footpath which runs along the southeastern boundary of the site is listed to be improved in the adopted Policies Map.
- The site is unaffected by any heritage assets and conservation areas.
- The entirety of the site is listed as a 'Biodiversity Opportunity Area'.
- The site is located within a minerals safeguarding area.
- The woodland to the north of the site, beyond Long Lane is listed as 'Ancient Replanted Woodland'.
- The woodland to the southeast of the site is designated as a Local Wildlife Site.
- The entirety of the site is located in watercourse flood zone 1 (lowest risk of flooding). In terms of surface water flooding, there is a small area medium risk in the southern wooded area and area of low risk along the northern boundary. The northern extent of Long Lane also has a high risk area.
- The site is located within the Tilehurst Neighbourhood Plan Area.

10.13 A number of the policy designations are set out in the current adopted policies map, below:

Figure 1 – Policies Map



10.14 As part of the Reg 19 LPR, WBC have prepared a draft Policies Map. Although reduced in detail and resolution, it appears many of the adopted designations remain in place. New designations include that the site is located within the AWE Aldermaston Outline Planning Zone (OPZ) and AWE Burghfield OPZ.

Development Potential

10.15 With consideration given to the onsite constraints and under the assumption that the entire site is allocated for development, the site provides the opportunity for 30 homes to be accommodated on site (including 40% affordable homes) incorporating open space, SuDS, landscaping, biodiversity enhancements, a new vehicular access points, pedestrian and cycle links, and associated infrastructure.

10.16 It is also notable that any planning permission would benefit the local area through S106 funding and CIL contributions which will help fund community facilities and infrastructure.

10.17 Further social benefits would include a significant increase in residents who would support existing local community facilities in Tilehurst including local public houses, retail units and community groups. The development would also improve pedestrian access to Sulham Woods.

10.18 Environmental benefits would comprise provision for new landscape planting which would include a number of measures intended to generate new habitats and promote biodiversity at the site. Such measures would be integrated within a holistic scheme of public open space, and multifunctional SuDS and Green Infrastructure.

- 10.19 In addition, the development would also propose to meet Future Homes standards, which go beyond those required by Building Regulations and current WBDC policy. In this respect, the proposals would positively contribute towards climate change through reduce carbon emissions.
- 10.20 Economically, future residents living at the potential 30 new homes (through local expenditure) would help to support the existing services in Tilehurst such as local public houses, retail units, community groups, the viability of the 16 bus service and schools.

Deliverability of the Proposed Development

- 10.21 The Housing and Economic Land Availability Assessment ('HELAA') (2023) made an assessment of all the sites submitted in the ongoing 'Call for Sites'. The HELAA site assessment proformas consider promoted sites in relation to their 'suitability', 'availability' and 'deliverability' for residential development within the proposed emerging plan period. 'Site A' was assessed under ref. TIL 14. Darcliffe's assessment of each test is set out, below.

Availability

- 10.22 Darcliffe have an option agreement on the site. Darcliffe and the Sulham Estate have a proven record of promoting land in Tilehurst as exemplified by Stonehams Farm (refs. EUA003 and EUA008) allocation in the HSA DPD (2017).
- 10.23 Furthermore, there are no known legal restrictions to the development of the site for the proposed use. The site is therefore considered to be available for residential development within the plan period (within the next 1 – 5 years), in accordance with PPG.

Suitability

- 10.24 In accordance with PPG, a site can be considered to be suitable if it would provide an appropriate location for development when considered against relevant constraints and their potential to be mitigated. Darcliffe considers that there are no absolute constraints to the development of this site within the proposed plan period.
- 10.25 Overall, it is clear that the site is sustainably located in terms of access to local facilities, amenities and public transportation links to the centre of Reading. The site would also represent a logical extension to the western boundary of the built up area of Tilehurst, up to Sulham Woods.
- 10.26 The site itself is mostly unconstrained and forms mostly developable land. Furthermore, there is ample space to mitigate impacts and work around the TPO's, RPA's, Ancient Woodland and Local Wildlife Area, through the means of green and blue infrastructure.
- 10.27 In terms of pedestrian access, the PRoW which is located at the south eastern corner of the site, the land is well connected for pedestrians to access the main built-up area of Tilehurst.
- 10.28 Although the 2013 SHELAA (site ref EUA032) assessed the site to be 'potentially developable', the 2023 HELAA identified the site 'not to be developable within the next 15 years' owing to the following concerns:

"The Council's Highways Team has raised concerns regarding access and the impact that development would have on local highway capacity, and they do not support the site.

The area has a strong rural character, and sense of tranquillity and wooded setting which is especially valued given the close proximity of the urban edges. Potential for impact upon the AONB."

- 10.29 In relation to highways, as detailed in the Transport and Access Appraisal Report ('TAAR') in **Appendix 4**, multiple potential vehicular, cycle and pedestrian access points are also achievable along Long Lane which can accommodate around 30 new homes. An independent traffic survey company have undertaken an Automated Traffic Counter (ATC) survey of the site (January 2023) which further demonstrates that traffic movements along road would be suitable to accommodate a new access.
- 10.30 The TAAR also undertakes a detailed further assessment of trip generation and development impact/mitigation along Long Lane as well as an analysis of the site's sustainability, confirming its suitability for development from a highways perspective.
- 10.31 In terms of potential impacts on the AONB, it should first be noted that the site is well screened from the AONB owing to its mature wooded boundaries. Development would therefore have a negligible to low impact on its setting. This is reiterated in the Council's 2014 LCA which indicated that development of part of the site was acceptable subject to mitigation.
- 10.32 In respect to impacts on landscape and the sites 'strong rural character', the 2014 LCA sets out a number of recommendations to mitigate impacts of a potential development including reinforcement of the tree belt along Long Lane with understorey planting to screen development and retention of the south eastern woodland.
- 10.33 An LVIA which was undertaken by TEP in respect to the nearby Stoneham Park development, also assessed Site A to understand the cumulative impacts of both developments. It was concluded that given the high level of enclosure, the site could accommodate residential development without giving rise to significant adverse visual effects. Furthermore, the significant degree of physical and visual containment of the site would suggest that sensitive development could be accommodated without material impact on the scenic and special qualities of the AONB. The rural character would be preserved, and development on the sites would make a positive contribution to the local character.
- 10.34 Darcliffe is committed to preparing a detailed Landscape and Visual Impact Assessment to inform the detailed design of the development proposal, to ensure that potential impacts are sufficiently mitigated and/or screened as appropriate.
- 10.35 Consequently, the potential concerns relating to the suitability of the site are not considered to represent absolute constraints to development and can be appropriately overcome. Darcliffe considers that the site is therefore suitable for development in relation to the provisions set out in Planning Practice Guidance.

Achievability

- 10.36 Given that the site is both *available* and *suitable* for the proposed quantum of development within the plan period, in combination with the modest scale of the site, it is considered that the proposed quantum of development identified within the current allocation could be achieved on the site within the first five years of the proposed plan period.
- 10.37 Furthermore, as identified through these representations it is considered that the site is capable of accommodating a greater quantum of development (approximately 30 new homes). Consequently, the site is considered to be *deliverable* in relation to the terms of the PPG.

Deliverability

- 10.38 As set out above, the site is *available* for development now, is in a *suitable* location for residential development, and is *achievable* for development in the early part of the proposed plan period. Consequently, the site is considered to be *deliverable* in relation to the provisions set out in Planning Practice Guidance.
- 10.39 Darcliffe have a track record for delivering housing in Tilehurst with this landowner as per Stonehams Farm example which secured planning permission in 2019 for 75 homes. Furthermore, as a SME housebuilder, rather than a land promoter, Darcliffe would build out the homes themselves at a fast rate, without the need to further sell on the land.
- 10.40 Allocation of the site for 30 new homes is considered to be necessary to ensure that the emerging local plan is *positively prepared* and *effective* in meeting the identified housing needs for the district and in assisting with meeting unmet need arising from outside of West Berkshire.

Darcliffe's Delivery History in Tilehurst

- 10.41 Darcliffe have an excellent history of delivering sites in Tilehurst having successfully promoted two sites through the West Berkshire Local Plan in 'The Ridings' and 'Stoneham Park'.
- 10.42 The Ridings, completed May 2020 and created 35 new homes for the local community. The need for housing in the area is highlighted by the fact that 15 of the 21 private residents moved from a Tilehurst Address to The Ridings. Three from Reading, two from Emmer Green & one from Early so every private purchaser already had a Reading postcode. 5 of our private buyers were first time buyers.
- 10.43 Stoneham Park is progressing well and has seen 46 completions at the time of writing this representation. The scheme will be fully occupied by the end of 2023 delivering 66 new homes (40 Private and 26 Affordable). Darcliffe have two plots of unreserved (apartments) and the rest have all either exchanged or reserved pending completion. Again, for a scheme of this size Darcliffe have had an incredibly local market. 19 of Darcliffe's purchasers moved to Stoneham Park from a Tilehurst Address, a further 11 from a Reading address, 3 from Caversham, 1 from Calcot and one from Pangbourne. This leaves only three of Darcliffe's incoming residents that did not move from an RG postcode. So far, 7 first time buyers have been helped.
- 10.44 Darcliffe are a privately owned business, with a social conscience. Darcliffe's build quality and standard specification has established a reputation from the local community for being 'different' to most housebuilders. Darcliffe's Sales Manager notes that numerous residents have stated that they had never even considered a new build before they viewed Darcliffe's product.
- 10.45 Darcliffe employ a local modest workforce, most of which live in Tilehurst or the surrounding villages. Darcliffe have also contributed in excess of £1,100,000 in CIL payments to West Berkshire across the two above sites. Alongside delivering 26 affordable units at Stoneham Park and 14 at The Ridings. Darcliffe worked with Sovereign Housing association on both schemes and their feedback was as follows – *"The homes on both sites were in high demand and proved very popular with customers seeking rental homes as well as shared ownership. Both schemes were really positively received in terms of demand and quality of the build."*

10.46 Darcliffe have enjoyed a good working relationship with West Berkshire and the various officers we have worked with. We would like to feel we have been easy to deal with ourselves.

10.47 With regards to Site's A and B, Darcliffe are more than happy to discuss the potential of the sites by looking at one to be a starter home scheme, i.e a scheme with smaller 2 & 3 bedroom homes with sensible SQFT sizes to keep the prices down. Darcliffe are also happy to initially enter into a first time buyer sales process where for a period of time after opening a show home. For example, 6 months where first time or buyers / people upsizing from flats are the only people who can purchase for that period.

APPENDIX 3 – DETAILED ASSESSMENT OF 'SITE B'S' DELIVERABILITY

The Site

- 10.48 At approximately 2.2ha, the site comprises grazing land and progressively slopes down south eastwards. The land is associated with the Equestrian Centre on Sulham Hill at Hall Place to the south of the site. The site is well screened on all sides by mature trees. The northern, western, and southern boundaries of the site are made up of woodland. To the east of the site is an informal footpath which runs through the trees, separating the site from the settlement boundary and built-up area of Tilehurst.
- 10.49 Two small existing agricultural accesses are located at the southwestern and northwestern corners of the site.
- 10.50 The local services/facilities near the site include:
- 16 Sky bus route is located along Dark Lane (200m from the site) and runs 7 days a week, from 5am to 11pm Monday-Saturday, every 30 mins. Sundays have a slightly reduced service. The service links to Reading town centre and the main train station (all distances measured in this document are at a straight line). Further details relating to access are set out in Appendix 4 – Transport and Access Appraisal Report for Site A.
 - Nurseys, Pre Schools, Primary Schools and Secondary Schools are located within 1km of the site.
 - A recreational park with a football pitch, playground, cricket pitch and skatepark within a 1-minute walk.
 - Several additional services, including convenience stores, sports centre, playgrounds, takeaways, post office, pharmacy, retail units, pubs and a sports centre within 1-1.5km or short bus journey/drive.

Policy Designations

- The site is located adjacent to the North Wessex Downs AONB.
 - The site is located within the countryside, adjacent to the settlement boundary of Tilehurst.
 - A group of TPO's cover the woodland on the northern, western and southern boundaries.
 - The access is not constrained by a TPO.
 - PROW TILE/17/1 runs along the eastern boundary of the site and is listed in the adopted Policies map to undergo improvement works.
 - The site is unaffected by any heritage assets and conservation areas.
 - The entirety of the site is listed as a 'Biodiversity Opportunity Area'.
 - The site is located within a minerals safeguarding area.
 - The woodland to the south of the site is listed as 'Ancient Replanted Woodland'.
 - The woodland to the south of the site is designated as a Local Wildlife Site.
 - The entirety of the site is located in watercourse flood zone 1 (lowest risk of flooding). In terms of surface water flooding, the southern strip of the site forms low to high risk surface water flooding.
 - The site is located within the Tilehurst Neighbourhood Plan Area.
- 10.51 A number of the policy designations are set out in the current adopted policies map, below:

Figure 2 – Policies Map



10.52 As part of the Reg 19 LPR, WBC have prepared a draft Policies Map. Although reduced in detail and resolution, it appears many of the adopted designations remain in place. New designations include that the site is located within the AWE Aldermaston Outline Planning Zone (OPZ) and AWE Burghfield OPZ.

Development Potential

10.53 With consideration given to the onsite constraints and under the assumption that the entire site is allocated for development, the site provides the opportunity for 49 homes to be accommodated on site (including 40% affordable homes) incorporating open space, SuDS, landscaping, biodiversity enhancements, a new vehicular access points, pedestrian and cycle links, and associated infrastructure.

10.54 It is also notable that any planning permission would benefit the local area through S106 funding and CIL contributions which will help fund community facilities and infrastructure.

10.55 Further social benefits would include a significant increase in residents who would support existing local community facilities in Tilehurst including local public houses, retail units and community groups. The development would also improve pedestrian access to Sulham Woods.

10.56 Environmental benefits would comprise provision for new landscape planting which would include a number of measures intended to generate new habitats and promote biodiversity at the site. Such measures would be integrated within a holistic scheme of public open space, and multifunctional SuDS and Green Infrastructure.

10.57 In addition, the development would also propose to meet Future Homes standards, which go beyond those required by Building Regulations and current WBDC policy. In this respect, the proposals would positively contribute towards climate change through reduce carbon emissions.

10.58 Economically, future residents living at the potential 49 new homes (through local expenditure) would help to support the existing services in Tilehurst such as local public houses, retail units, community groups, the viability of the 16 bus service and schools.

Deliverability of the Proposed Development

10.59 The Housing and Economic Land Availability Assessment ('HELAA') (2023) made and assessment of all the sites submitted in the ongoing 'Call for Sites'. The HELAA site assessment proformas consider promoted sites in relation to their 'suitability', 'availability' and 'deliverability' for residential development within the proposed emerging plan period. 'Site A' was assessed under ref. TIL 15. Darcliffe's assessment of each test is set out, below.

Availability

10.60 Darcliffe have an option agreement on the site. Darcliffe and the Sulham Estate have a proven record of promoting land in Tilehurst as exemplified by Stonehams Farm (refs. EUA003 and EUA008) allocation in the HSA DPD (2017).

10.61 Furthermore, there are no known legal restrictions to the development of the site for the proposed use. The site is therefore considered to be available for residential development within the plan period (within the next 1 – 5 years), in accordance with PPG.

Suitability

10.62 In accordance with PPG, a site can be considered to be suitable if it would provide an appropriate location for development when considered against relevant constraints and their potential to be mitigated. Darcliffe considers that there are no absolute constraints to the development of this site within the proposed plan period.

10.63 Overall, it is clear that the site is sustainably located in terms of access to local facilities, amenities and public transportation links to the centre of Reading. The site would also represent a logical extension to the western boundary of the built up area of Tilehurst, up to Sulham Woods.

10.64 The site itself is mostly unconstrained and forms mostly developable land. Furthermore, there is ample space to mitigate impacts and work around the TPO's, RPA's, Ancient Woodland and Local Wildlife Area, through the means of green and blue infrastructure.

10.65 In terms of pedestrian access, the PRow which is located along the eastern corner of the site, the land is well connected for pedestrians to access the main built-up area of Tilehurst.

10.66 In relation to highways, as detailed in the **Transport and Access Appraisal Report ('TAAR') in Appendix 5**, multiple potential vehicular, cycle and pedestrian access points are also achievable along Sulham Hill which can accommodate around 49 new homes. An independent traffic survey company have undertaken an Automated Traffic Counter (ATC) survey of the site (January 2023) which further demonstrates that traffic movements along road would be suitable to accommodate a new access.

- 10.67 The TAAR also undertakes a detailed further assessment of trip generation and development impact/mitigation along Sulham Hill as well as an analysis of the site's sustainability, confirming its suitability for development from a highways perspective.
- 10.68 Although the 2013 SHELAA (site ref EUA032) assessed the site to be 'potentially developable', the 2023 HELAA identified the site 'not to be developable within the next 15 years' owing to the following concern:
- "The area has a strong rural character, and sense of tranquillity and wooded setting which is especially valued given the close proximity of the urban edges. Potential for impact upon the AONB."*
- 10.69 The site was assessed at Appendix H, under reference EUA032, of the 2014 Landscape Capacity Assessment of Potential Housing Sites within and adjacent to the North Wessex Downs Area of Outstanding Natural Beauty, West Berkshire: Final Phase 2 Report: Eastern Urban Area.
- 10.70 The assessment recognises that site as being located in the 'LLCA13E: Little Heath Gravel Plateau' which has an overall sensitivity of medium to low. The assessment is summarised, as follows:
- The settlement wraps around the site, but there is no intervisibility.
 - Impact on visual characteristics is very low owing to the site being enclosed by the typical woodland and dense tree belts.
 - Potential adverse impact on the rural character of Sulham Hill.
 - Potential adverse impact on Sulham Hill if views of settlement are introduced (settlement is currently well screened in this location). Access is therefore not recommended off Sulham Hill. A detailed assessment of any alternative access point in order to avoid any unacceptable impacts on local landscape and ecological assets.
 - Extends the settlement up out from lower slopes onto undulating landscape of the AONB.
 - It is summarised that development could be accommodated subject to important measures to conserve and enhance the natural beauty and special qualities of the AONB.
- 10.71 To conclude the findings, the significant degree of physical and visual containment of the site suggests that sensitive development could be accommodated without material impact on the scenic and special qualities of the AONB. Sensitive development would be most appropriately accommodated based off the recommendations of a LVIA and its suggested mitigation measures, especially in respect to accessing the site off Sulham Hill.
- 10.72 Darcliffe is committed to preparing a detailed Landscape and Visual Impact Assessment to inform the detailed design of the development proposal, to ensure that potential impacts are sufficiently mitigated and/or screened as appropriate.
- 10.73 Consequently, the potential concerns relating to the suitability of the site are not considered to represent absolute constraints to development and can be appropriately overcome. Darcliffe considers that the site is therefore suitable for development in relation to the provisions set out in Planning Practice Guidance.

Achievability

- 10.74 Given that the site is both *available* and *suitable* for the proposed quantum of development within the plan period, in combination with the modest scale of the site, it is considered that the proposed quantum of development identified within the current allocation could be achieved on the site within the first five years of the proposed plan period.
- 10.75 Furthermore, as identified through these representations it is considered that the site is capable of accommodating a greater quantum of development (approximately 30 new homes). Consequently, the site is considered to be *deliverable* in relation to the terms of the PPG.

Deliverability

- 10.76 As set out above, the site is *available* for development now, is in a *suitable* location for residential development, and is *achievable* for development in the early part of the proposed plan period. Consequently, the site is considered to be *deliverable* in relation to the provisions set out in Planning Practice Guidance.
- 10.77 Darcliffe have a track record for delivering housing in Tilehurst with this landowner as per Stonehams Farm example which secured planning permission in 2019 for 75 homes. Furthermore, as a SME housebuilder, rather than a land promoter, Darcliffe would build out the homes themselves at a fast rate, without the need to further sell on the land.
- 10.78 Allocation of the site for 30 new homes is considered to be necessary to ensure that the emerging local plan is *positively prepared* and *effective* in meeting the identified housing needs for the district and in assisting with meeting unmet need arising from outside of West Berkshire.

APPENDIX 4 – TRANSPORT AND ACCESS APPRAISAL REPORT FOR SITE A



LAND TO THE EAST OF LONG LANE & SOUTH BLACKTHORN CLOSE, TILEHURST

TRANSPORT AND ACCESS APPRAISAL

01 March 2023



LAND TO THE EAST OF LONG LANE & SOUTH BLACKTHORN CLOSE, TILEHURST

TRANSPORT AND ACCESS APPRAISAL

PROJECT DETAILS

| | |
|----------------------------|---|
| Project Name: | Land to the east of Long Lane & south Blackthorn Close, Tilehurst |
| Client: | Darcliffe Homes |
| Document Type: | Transport and Access Appraisal |
| Document Reference: | R-23-0010-01 |
| Date: | 01 March 2023 |

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1. Introduction

- 1.1.1. Evoke Transport Planning Consultants Ltd (Evoke) has been commissioned by Darcliffe Homes to consider the feasibility of developing Land to the east of Long Lane & south Blackthorn Close, Tilehurst, for future residential development. The local planning authority (LPA) and local highway authority (LHA) are West Berkshire Council (WBC).
- 1.1.2. The site lies to the east of Long Lane, bound to the north east by residential properties off Blackthorn Close and to the south by Barefoot Copse and Sulham Hill. The site is currently used for agricultural purposes.
- 1.1.3. The location of the site is outlined in Figure 1 below.

Figure 1 – Site Location



Background Image Source: Google Maps

1.2. Potential Future Development

- 1.2.1. This Transport and Highways Appraisal has been prepared to support the promotion of the site for residential development, to be considered through the updated West Berkshire Local Plan.
- 1.2.2. The precise design and composition of the potential development is yet to be confirmed and would be subject to any forthcoming planning application. However, at this stage, the site is considered suitable to accommodate around 30 residential units, including new vehicle, pedestrian and cycle access points.

1.3. Report Structure

- 1.3.1. This report has been prepared to consider the following:

- The accessibility of the site for all potential site users by all modes of transport;
 - To ascertain if safe and suitable access can be achieved for all modes of transport;
 - To identify any potential future transport and highway related impacts; and
 - To consider the potential mitigation and/or improvement options which may be considered suitable to come forward through any potential allocation and/or future planning application at the site.
- 1.3.2. The above has been considered in accordance with national and local planning policy requirements including the NPPF and PPG and the currently adopted planning policy, national and local design guidance, and consideration of potential future policy and guidance requirements which may come forward either through the ongoing Local Plan process and/or through other emerging documentation.
- 1.3.3. It is important to note that, should development at this site come forward, a Transport Statement, Travel Plan and other relevant documentation would be produced to fully evaluate the transport and highway impacts associated with the precise development, which would include detailed discussions with the LHA. Notwithstanding this, the findings of this Transport and Highways Appraisal enable an understanding of the key considerations at this stage and demonstrate the development potential.
- 1.3.4. Following this introductory section, the remainder of the report is structured as follows:
- **Section 2: Policy and Design Compliance** – Provides a summary of the current and emerging national and local planning policy and design guidance relevant to this potential allocation;
 - **Section 3: Existing Situation** – Describes the existing transport and highways conditions at the site and within the surrounding area;
 - **Section 4: Potential Development Strategy** – Provides discussion of the proposed site allocation in respect of access, sustainable movement strategy, trip generation and potential development impact;
 - **Section 5: Summary** – Outlines the findings of this Transport and Highways Appraisal and summarises the proposed site allocation in transport and highways terms.

2. Policy and Design Guidance

2.1. Introduction

2.1.1. This chapter reviews current and emerging transport planning policies and guidance at national and local levels and summarises how the potential site allocation should comply.

2.2. National Policy and Guidance

National Planning Policy Framework

2.2.1. In July 2021, the revised National Planning Policy Framework (NPPF) was published, setting out a number of transport objectives designed to facilitate sustainable development and contribute to a wider sustainability by giving people a wider choice about how they travel.

2.2.2. Paragraph 106 states that planning policies should:

- Support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities;
- Be prepared with the active involvement of local highways authorities, other transport infrastructure providers and operators and neighbouring councils, so that strategies and investments for supporting sustainable transport and development patterns are aligned;
- Identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development;
- Provide for attractive and well-designed walking and cycling networks with supporting facilities such as secure cycle parking (drawing on Local Cycling and Walking Infrastructure Plans);
- Provide for any large-scale transport facilities that need to be located in the area, and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy. In doing so they should take into account whether such development is likely to be a nationally significant infrastructure project and any relevant national policy statements.

2.2.3. In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that (paragraph 110):

- Appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;
- Safe and suitable access to the site can be achieved for all users;
- The design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and
- Any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.

2.2.4. At paragraph 111 the NPPF states that development should only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. Within this context, applications for development should:

- Give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;

- Address the needs for people with disabilities and reduced mobility in relation to all modes of transport;
- Create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;
- Allow for the efficient delivery of goods, and access by service and emergency vehicles; and Be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

National Design Guide (October 2019)

2.2.5. The National Design Guide was published in October 2019 and sets out the characteristics of well-designed places and demonstrates what good design means in practice. Paragraph 62 states that well-designed places are walkable with safe, recognisable and legible streets, are accessible by public transport and provide access to services and facilities. Paragraph 76 states that a well-designed movement network;

- is safe and accessible for all;
- functions efficiently to get everyone around, takes account of the diverse needs of all its potential users and provides a genuine choice of sustainable transport modes;
- limits the impacts of car use by prioritising and encouraging walking, cycling and public transport, mitigating impacts and identifying opportunities to improve air quality;
- promotes activity and social interaction, contributing to health, well-being, accessibility and inclusion; and
- incorporates green infrastructure, including street trees to soften the impact of car parking, help improve air quality and contribute to biodiversity.

2.2.6. Paragraph 77 states that priority in developments should be to pedestrian and cycle movements and developments should create routes that are safe, direct, convenient and accessible for people of all abilities (Paragraph 78).

Manual for Streets (MfS 2007) and Manual for Streets 2 (MfS2 2010)

2.2.7. These documents provide guidance for planning and designing new residential streets. They aim to increase the quality of life through good design which creates more people-orientated streets. The key recommendation of MfS / MfS2 is that increased consideration should be given to the 'place' function of streets. This function is essentially what distinguishes a street from a road, where the main purpose is to facilitate movement.

2.2.8. The underlying theme when designing street networks (as opposed to designing individual streets) is catering for movement. Walkable neighbourhoods are typically characterised by having a range of facilities available to residents that can be accessed comfortably on foot. Making the local environment convenient and attractive to walk in can help enhance the vibrancy of a community and reduce reliance on motor transport.

2.2.9. Another key theme within MfS/MfS2 is providing sufficient visibility at access junctions. The visibility splay at a junction ensures that there is adequate inter-visibility between vehicles on the major and minor arms. The visibility requirements are outlined in Table 7.1 of MfS which has been reproduced in Table 1.

Table 1 – MfS Stopping Sight Distances

| Derived SSDs for streets | | | | | | | | | | | | |
|--|---------------------------|----|----|----|----|----|----|----|----|----|----|----|
| Speed | Kilometres per hour (Kph) | 16 | 20 | 24 | 25 | 30 | 32 | 40 | 45 | 48 | 50 | 60 |
| | Miles per hour (Mph) | 10 | 12 | 15 | 16 | 19 | 20 | 25 | 28 | 30 | 31 | 37 |
| Stopping Sight Distance (SSD) | | 9 | 12 | 15 | 16 | 20 | 22 | 31 | 36 | 40 | 43 | 56 |
| SSD adjusted for bonnet length | | 11 | 14 | 17 | 18 | 23 | 25 | 33 | 39 | 43 | 45 | 59 |
| Additional features will be needed to achieve low speeds | | | | | | | | | | | | |

- 2.2.10. MfS explicitly states that the document “comprises technical guidance and does not set out any new policy or legal requirements”. As such MfS provides a best practice guide for designing new junctions/improving existing junctions.
- 2.2.11. It is noted that a third edition of MfS is currently being prepared. Whilst, at the time of writing this document is not yet published, any future development opportunity at the site will consider any new or revised requirements when considering the design of the site layout.

2.3. Local Planning Policy and Guidance

Current West Berkshire Local Plan

- 2.3.1. WBC’s current Local Plan includes the Core Strategy Development Plan Document (DPD), the Housing Site Allocations Development Plan Document and a number of Supplementary Planning Documents (SPDs) and Saved Policies. The current plan was adopted in 2012 and covers up to 2026.
- 2.3.2. Core Policy CS13: Transport states that residential development should seek to demonstrate good accessibility by:
 - Locating where there is already good access to key services and facilities;
 - Contributing towards improving connections between communities and key services and facilities.

West Berkshire Local Plan Review

- 2.3.3. WBC is currently undertaking a review of their Local Plan to cover the period to 2039. The Regulation 19 consultation on the Local Plan Review proposed submission document is currently being undertaken.

Previous WBC Site Assessment

- 2.3.4. The site was originally assessed within the 2013 Strategic Housing Lane Availability Assessment (site ref EUA033) as ‘potentially developable’ and was subsequently reviewed as part of the site selection process for the Housing Site Allocations Development Plan Document.
- 2.3.5. The site was originally included as a preferred option but was subsequently discounted following completion of a Landscape Assessment which stated a preference for two other sites (EUA003/008) over this site. There were also concerns regarding the traffic impact of several developments in this area. Whilst technical solutions were available, they could have impacted on the viability and deliverability of the site in the short term.
- 2.3.6. Through the Landscape Sensitivity Assessment (2014), it was stated that no access should be taken from Sulham Hill, and that the access point off Long Lane is as close to the houses in Blackthorn Close as possible. Concerns were also raised over the narrow nature of Long Lane in the vicinity of the site.
- 2.3.7. Through the Housing and Economic Land Availability Assessment (HELAA, Appendix 4, Site Assessments) which forms part of the Reg 19, the site (ref TIL14) the site was ultimately not taken forward to a formal allocation. In terms of transport and highways, the following comments were made:

Access:

This site was considered previously with the Housing Site Allocations Development Plan Document. An adoptable access can be obtained with the required sight lines. However the site was resisted due to concerns that Long Lane is narrow and windy near the site. There is also concern regarding sight lines at the Long Lane / Sulham Hill junction and Sulham Hill in general. Highways continue to not support this site.

Local Highway Capacity:

Concerns regarding additional traffic levels on the narrow and windy Long Lane fronting the site. Highways do not support this site.

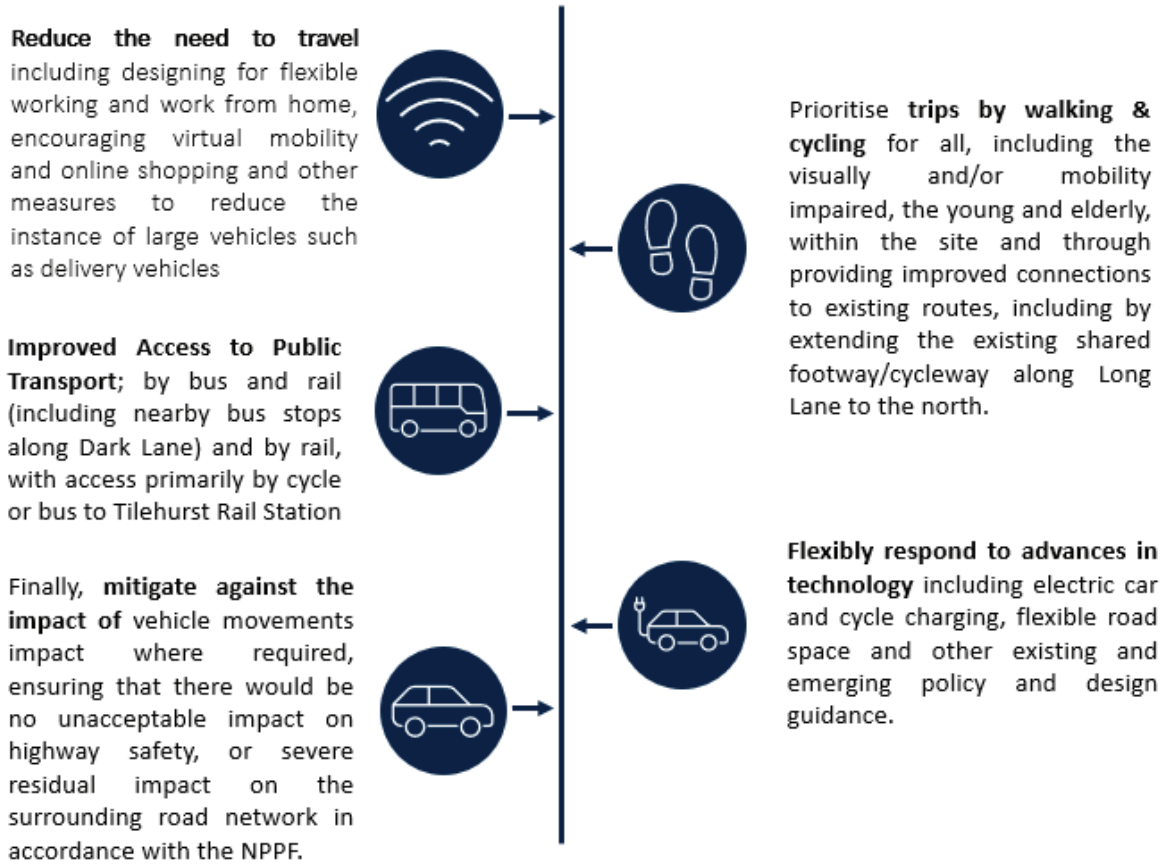
Strategic Road Network:

National Highways have advised that individually the site would unlikely materially impact the operation of the strategic road network.

Summary

- 2.3.8. Should the site developed, any planning application would be subject to a full review of any current and/or emerging policy and design guidance, to ensure that a future development strategy comes forward in accordance with both national and local requirements.
- 2.3.9. Notwithstanding this, this Transport and Access Appraisal considers the potential development potential in relation to current policy and design guidance; and also seeks to respond to the previous assessment of this site through the various optioneering assessments completed by WBC through development of their current and updated Local Plan.
- 2.3.10. At the forefront of any planning application will be the development and implementation of a transport hierarchy, which seeks to ensure that any future development prioritises a reduced need to travel, followed by supporting trips by walking, cycling and public transport whilst flexibly responding to advances in technology. Finally, the impact of any residual vehicle movements will be suitably accommodated, with mitigation where required in accordance with the NPPF.
- 2.3.11. The transport hierarchy for this site is summarised in Figure 2.

Figure 2 – Transport Hierarchy



3. Existing Site Conditions

3.1. Context

3.1.1. This section outlines the baseline transport conditions at the site and in the surrounding area, considering the existing walking, cycling, public transport and road network and the facilities and amenities available.

3.2. Site Location and Existing Use

3.2.1. The site is located within the Tilehurst area of Reading. Tilehurst is a large residential suburb, supported by a wide range of shops, services and other amenities, with fast and direct bus links to and from Reading Town Centre, and a rail station which is on the Great Western Main Line, providing stopping services between Oxford and Reading. The site in its local context is demonstrated in Figure 3.

Figure 3 – Local Area Around the Site, Detailing Viewpoints and Footways



Base Map Source: Google Maps

3.2.2. The site itself is located on the western edge of Tilehurst, bordered to the north-east by residential properties off Blackthorn Close, to the south by woodland, and to the west by Long Lane. The site is currently used for agricultural purposes.

3.2.3. The current access to the site is currently a field gate positioned near to the junction of Long Lane and Sulham Hill. This is shown in Figure 4.

Figure 4 – Current Access to Site off of Long Lane, Shown in Red



3.3. Walking and Cycling Network

- 3.3.1. To enable an assessment of the viability of walking and cycling between the site and key destinations in the local area it is appropriate to establish the maximum distance that people are generally prepared to walk and/or cycle and the destinations that exist within these distances.
- 3.3.2. The Chartered Institute for Highways and Transport (CIHT) guidance, 'Planning for Walking' (2015) states that 'walkable neighbourhoods are typically characterised as having a range of facilities within 10 minutes' walking distance (around 800m). It states that for bus stops in residential areas, 400m has traditionally been regarded as a cut off point, and that people will walk up to 800m to a rail station.
- 3.3.3. The guidance also notes that *'the propensity to walk or cycle is not only influenced by distance but also the quality of the experience; people may be willing to walk or cycle further where their surroundings are more attractive, safe and stimulating.'*
- 3.3.4. Additionally, Manual for Streets states that *'walkable neighbourhoods are typically characterised by having a range of facilities within 10 minutes' (up to about 800m) walking distance of residential areas which residents may access comfortably on foot. However, this is not an upper limit and PPG13 states that walking offers the greatest potential to replace short car trips, particularly those under 2km.'*
- 3.3.5. Cycling is considered an important mode of sustainable travel, and five miles (c.8km) is generally considered an 'achievable' cycle distance for most people (source: LTN 1\20, Cycle Infrastructure design).

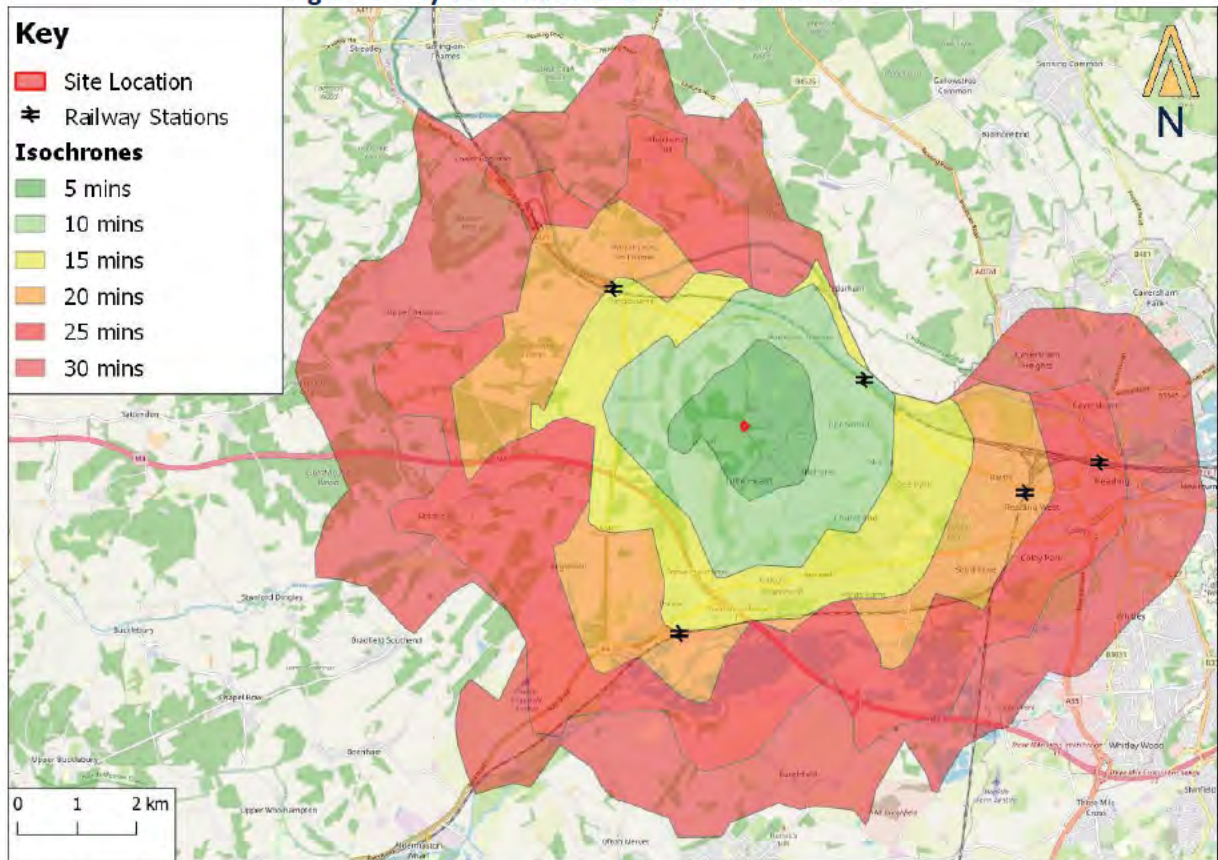
- 3.3.6. The foot and cycle network in the vicinity of the site is extensive and includes a network of footways, Public Right of Ways (PRoWs) and shared foot/cycle paths, including a shared footway/cycleway running along Long Lane, connecting from just beyond the northern site boundary to the surrounding area. Examples of typical footpath profiles are shown in Figure 5, with their locations in reference to the site shown earlier in Figure 3.

Figure 5 – Typical Images of Local Pathways and Roads



- 3.3.7. The network of footways and PRoWs link the site directly to the surrounding built up area of Tilehurst, including its local facilities and amenities. Back Lane, running approximately 70m south of site's southern boundary, is designated as a Bridleway (ref 17/1) which provides a pedestrian and cycle link between Sulham Hill and Dark Lane.
- 3.3.8. WBC's interactive Online Map demonstrates that the 'Round Berkshire Cycle Route' follows an almost circular route around the entire district, linking with towns and villages across West Berkshire and continuing into Reading, through Tilehurst. The route runs along Long Lane to the west of the site, connecting with Dark Lane, before it joins with the formal 'North West Reading Cycle Route' which runs between Denefield School and Tilehurst Station, continuing into Reading Town Centre.
- 3.3.9. Figure 6 shows cycle isochrones which demonstrate the areas that can be reached within a 30-minute cycle of the site (at 5-minute intervals). The isochrones are generated based on speeds dependent on the surface and highway type. The majority of the routes used would be paved and as such would be subject to an c.18kph cycle speed based on the parameters in the software. A five-minute isochrone would therefore cover a distance of c. 1.5km, with a 30 minute isochrone covering a distance of 9km.

Figure 6 – Cycle Isochrones from Site Location



Source: QGIS, OpenStreetMap, and OpenRouteService (assuming 18 kph cycle speed)

3.3.10. The isochrone demonstrates that five railway stations are accessible by bike within 25 minutes of the site, including Tilehurst station which is a less than ten minute cycle journey. Additionally, all of Reading Town Centre is within the maximum acceptable cycling distance, as well as Theale and Pangbourne.

3.4. Public Transport Accessibility

Bus Services

3.4.1. The site benefits from direct access to bus stops on Dark Lane via foot or cycle via Long Lane, with the bus stops situated c.400m to the north of the site (a five-minute walk). The Dark Lane Top Bus Stop provides access to the 16 Route. The details of this bus service are shown in Table 2.

Table 2 – Bus Routes within 640m

| No. | Destination | Weekday Frequency | | | Weekend Frequency | |
|-----|---------------------|-------------------|-----------|----------|-------------------|------------|
| | | Frequency | First Bus | Last Bus | Saturday | Sunday |
| 16 | Reading Town Centre | 20 minutes | 05:58 | 23:58 | 20 minutes | 30 minutes |
| 16 | Purley on Thames | 20 minutes | 05:36 | 23:41 | 20 minutes | 30 minutes |

National Rail

3.4.2. The nearest train station is Tilehurst station, a 2.5km journey away (a 30-minute walk or a nine-minute cycle). This station provides half-hourly services between London Paddington via Reading (Reading – 7 minutes, London – one hour) and Didcot Parkway (a 23-minute journey). The details of these services are shown in Table 3.

Table 3 – Train Routes from Tilehurst Station

| Destination | Weekday Frequency | | | Weekend Frequency | |
|-------------------------------|-------------------|-------------|------------|-------------------|------------|
| | Frequency | First Train | Last Train | Saturday | Sunday |
| London Paddington via Reading | 30 minutes | 04:32 | 01:22 | 30 minutes | 1 per hour |
| Didcot Parkway | 30 minutes | 05:55 | 00:30 | 30 minutes | 1 per hour |

- 3.4.3. Tilehurst Station has access to 10 cycle parking spaces in the form of a secure cycle store, in addition to a 114-space car park with the provision of two disabled parking bays.
- 3.4.4. As well as access via foot or cycle, the station is also accessible by bus; with a journey time of just four minutes.
- 3.4.5. Both of these public transport routes provide a viable alternative mode of travel for commuting, with services covering commuting times and providing access to Reading, Maidenhead, and Slough in under 40 minutes (assuming the user cycles to the train station).

3.5. Accessibility to Local Services

- 3.5.1. Figure 7 considers the site in its wider local context, including local facilities and amenities, and summarising the above walking, cycling and public transport accessibility to and from these.

Figure 7 – Summary of Accessibility Context



Source: Map Data from Google Maps

- 3.5.2. It is therefore demonstrated that the site is well located, within the suburb of Tilehurst and with direct access to Reading Town Centre via bus or train, and with a network of footways, cycleways and PROWs which provide both formal route options and leisure routes to surrounding schools, employment, shops and services.

3.6. Census Data

3.6.1. An analysis of the Census data has been undertaken to investigate the journey to work modal split for the existing resident population. The site is located within the West Berkshire 005 Middle Super Output Area (MSOA) and the data using the origin/destination 2011 data, and the recently released 2021 data (not yet available as origin/destination) is contained within Table 4.

Table 4 – Census 2011 and 2021 Journey to Work Data (West Berkshire 005 MSOA)

| Mode | 2011 Data | 2021 Data |
|---------------------|---------------|---------------|
| Train / Underground | 4.7% | 2.0% |
| Bus | 9.9% | 4.4% |
| Taxi | 0.0% | 0.1% |
| Motorcycle | 0.5% | 0.4% |
| Car Driver | 70.9% | 76.4% |
| Car Passenger | 5.6% | 6.1% |
| Bicycle | 2.4% | 1.8% |
| On foot | 5.8% | 7.7% |
| Other | 0.2% | 1.0% |
| Total | 100.0% | 100.0% |

3.6.2. Table 4 shows that, of those travelling from the West Berkshire 005 MSOA to work, the 2011 data shows approximately 71% of journeys are made by car, with a further 5.6% made by car passenger. The 2021 data shows a higher percentage of car driver, at 76.4% with 6.1% of journeys made by car passenger.

3.6.3. It is worth noting that the 2021 data was undertaken during the COVID-19 pandemic, in the midst of a national lockdown. As such, the data is unlikely to represent residents ‘usual’ mode of travel. For example, a review of the Census 2021 data indicates a large proportion (around 38.4% of total respondents) in this MSOA working at or mainly from home. Whilst this data has been discounted from the results presented in Table 4, it is important to recognise that working habits have seen a significant shift in the last few years, primarily as a result of the COVID-19 pandemic, with a significant proportion of the working population now working from home at least some of the working week.

3.6.4. A further review of the LC7701EW dataset (Method of Travel to Work, 2001 specification, by distance travelled to work) indicates that, in 2011, approximately 11% of residents within this MSOA stated that they worked mainly at or from home; thus whilst some people have now returned to pre-pandemic habits, a number have maintained their working from home practices and as such the level of increase is likely to impact the number of trips generated by a residential development such as this, particularly during the traditional network peak hours.

3.6.5. Similarly, there have been significant short and medium term shifts away from public transport. Some are likely to be a result of shorter term concerns over social distancing, but others simply a result of residents travelling less frequently to their workplace and thus using other modes. Public transport operators are responding to these shifts to encourage uptake, for example flexible ticketing options, however these were not in place at the time of the 2021 census. It is therefore recognised that both sets of Census data need to be treated with caution and used as an indication of potential travel mode only.

3.6.6. For the purpose of establishing potential mode share for future residents travelling to work from the site, the 2011 Census data is considered the most robust dataset, as it takes account of ‘typical’, historic mode share, uninfluenced by factors surrounding the lockdown. Any available Census data, along with any other emerging data which may influence travel habits, would be reviewed through any future planning application at the site.

3.7. Local Road Network

Long Lane

- 3.7.1. Long Lane is a single-carriageway road subject to a 30mph speed restriction, which varies in width between approximately 3.5 and 4.1m along the site frontage.
- 3.7.2. Figure 8 shows Long Lane at the north and south ends of the road near the site. Formal and informal passing places together with parking lay-bys are provided along Long Lane, enabling two cars to pass each other in various sections.

Figure 8 – Long Lane Site Frontage



- 3.7.3. An Automated Traffic Counter (ATC) was placed along Long Lane between 24th January 2023 and 30th January 2023 by an independent traffic survey company to ascertain existing traffic volumes and speeds in the vicinity of the site. The location of the ATC placement is shown in Figure 9.

Figure 9 – Long Lane ATC Location



- 3.7.4. The ATC recorded a two-way, weekday peak hour of 08:00-09:00 in the morning (AM) period, and 16:00-17:00 in the afternoon (PM) period. A summary of the two-way traffic flows and speeds are presented in Table 5 (total vehicles and recorded speed) with the full data attached at **Appendix A**.

Table 5 – Long Lane ATC Summary (Total Vehicles)

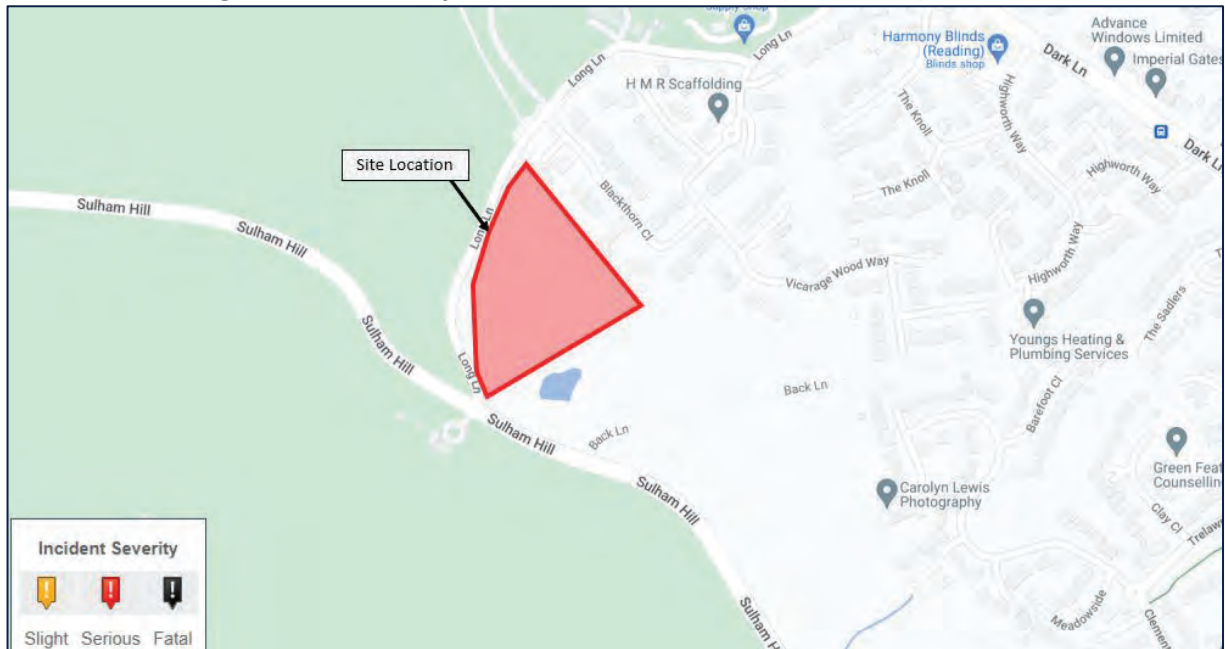
| | Northbound | | | Southbound | | | Two-Way | | |
|------------------------------------|------------|---------|-------|------------|---------|-------|---------|---------|-------|
| | AM Peak | PM Peak | Daily | AM Peak | PM Peak | Daily | AM Peak | PM Peak | Daily |
| Tuesday (24th) | 57 | 62 | 888 | 68 | 90 | 962 | 125 | 152 | 1850 |
| Wednesday (25th) | 59 | 72 | 821 | 62 | 116 | 937 | 121 | 188 | 1758 |
| Thursday (26th) | 64 | 61 | 888 | 88 | 98 | 963 | 152 | 159 | 1851 |
| Friday (27th) | 84 | 90 | 993 | 72 | 99 | 1057 | 156 | 189 | 2050 |
| Saturday (28th) | 76 | 95 | 898 | 107 | 75 | 986 | 183 | 170 | 1884 |
| Sunday (29th) | 61 | 59 | 644 | 89 | 55 | 725 | 150 | 114 | 1369 |
| Monday (30th) | 86 | 59 | 716 | 107 | 62 | 798 | 193 | 121 | 1514 |
| Weekday Average | 70 | 69 | 861 | 79 | 93 | 943 | 149 | 162 | 1805 |
| Day Average | 70 | 71 | 835 | 85 | 85 | 918 | 154 | 156 | 1754 |
| 85 th Percentile Speeds | 25.6 | | | 25.6 | | | 25.6 | | |
| Average Mean Speed | 20.3 | | | 19.5 | | | 19.9 | | |

- 3.7.5. The five-day (weekday) average flows were recorded at 154 two-way movements during the AM Peak and 156 two-way movements during the PM Peak, with 1,805 two-way movements recorded across the daily (24-hour) period.
- 3.7.6. It is noted that average total traffic flows are similar across the morning hours from 0900-1200, though the hour from 11:00 – 12:00 represents the highest two-way flows and thus has been used as the AM network peak to ensure a robust assessment. The PM peak was similarly noted as 16:00-17:00.
- 3.7.7. With regards to vehicle speeds, an 85th percentile of 25.6mph was recorded, which is below the posted speed limit of 30mph.

3.8. Highway Safety

- 3.8.1. A review of the online vehicle collision database at www.crashmap.com has been undertaken to establish the nature of any recorded Personal Injury Accident (PIA) incidents in the vicinity of the site over the latest available five-year period (2017-2021). The data is demonstrated in Figure 10.

Figure 10 – Summary of Recorded PIA Incidents (2017-2021)



Source: crashmap.com

- 3.8.2. It is noted that no PIA incidents have been recorded anywhere in the vicinity of the site over the latest available five-year period. It is further noted that no incidents have been recorded anywhere along Long Lane since 2013, when an incident classified as ‘slight’ was recorded, which involved vehicles only.
- 3.8.3. Any future planning application would include a full review of up-to-date accident data at the time of application, using the full recorded data available from West Berkshire Council.

3.9. Summary

- This section has considered the site’s accessibility by all modes of transport, including by foot and cycle as a priority, by public transport, and also by vehicle modes. This assessment has been used to consider the opportunities which this site presents to support and further enhance the accessibility of the surrounding area alongside any potential allocation.
- In terms of accessibility, the site is well located in relation to the existing built up suburb of Tilehurst, including bus stops, schools, employment opportunities and other local shops and services. The residential nature of the site would integrate well with the existing nature of the surrounding area.
- The five-day (weekday) average flows were recorded at 154 two-way movements during the AM Peak and 156 two-way movements during the PM Peak, with 1,805 two-way movements recorded across the daily (24-hour) period. Whilst vehicle speeds are below the 30mph limit with an 85th percentile of 25.6mph recorded;
- Additionally, the existing foot and cycle network, including the existing shared footway/cycleway which runs along Long Lane to the north of the site, presents a significant opportunity to link the site via a traffic free route to the surrounding area;
- A review of Census data indicates that, in 2011, approximately 71% of journeys to work were made by private car, with approximately 23% made by sustainable modes, which includes almost 10% by bus. Comparing this to the 2021 data which has been recently released sees a shift away from bus and towards on-foot travel, however there is also a clear shift towards working from home;

with an increase of over 30% between the two censuses. Whilst the 2011 data continues to provide a more stable dataset at the time of writing, emerging trends in travel habits will need to be taken into account through any future application at the site.

- A review of PIA incidents indicates that no incidents have been recorded along Long Lane anywhere in the vicinity of the site since 2013, demonstrating that there is no existing highway safety issue in the vicinity of the site;
- Considering the analysis provided within this section, it is considered that the site location is suitable to accommodate this level of residential development.

5. Potential Development Strategy

5.1. Context

5.1.1. This section outlines the potential development strategy including potential access location(s) for all modes and provides details of how the site is likely to operate in transport and highway terms.

5.2. Indicative Masterplan

5.2.1. The precise design and composition of the potential future development has yet to be confirmed and will be subject to any forthcoming planning application. However, the site is considered suitable to accommodate a residential development of around 30 dwellings with vehicle access from Long Lane, supported by a shared footway/cycleway to link with the existing network on Long Lane, and with the potential for additional pedestrian and cycle links to the east.

5.3. Transport Hierarchy

5.3.1. The preliminary masterplan, including access and off-site highway considerations, has been prepared with the transport hierarchy at the forefront in accordance with local and national policy; placing priority first on a reduced need to travel, and encouraging travel by pedestrians, cyclists and public transport.

5.3.2. This section demonstrates that suitable access to the site can be achieved for all potential future site users and shows that allocation of the site would enable supporting off-site improvements which would provide walking and cycling links to the surrounding area.

5.4. Potential Development Site Access Strategy

5.4.1. This section considers the various potential access options which could be delivered if the site were to be allocated.

5.4.2. It is noted that access from Sulham Hill has previously been discounted, with access preferred from Long Lane. The HELAA (summarised in Section 2) noted that **'an adoptable access can be obtained with the required sight lines'** but that Long Lane was narrow and windy fronting the site. Previous assessments by Glanville Consultants did demonstrate that suitable access could be achieved, but did not address the existing widths along Long Lane and the potential for widening and/or passing places which could be delivered if the site were to be allocated.

5.4.3. This section seeks to address and respond to the previous WBC highway assessments, ultimately demonstrating that access to the site for all users can be suitably achieved, in addition to the potential for passing places along Long Lane which would address WBC's previous concerns. Should the site be allocated, each access option would be further considered in co-ordination with WBC.

Vehicular Site Access Arrangements

5.4.4. Access from the north west of the site from Long Lane would allow for vehicle access to be located adjacent to the existing built-up area, at a point before Long Lane narrows further south and west. This location would also allow for the provision of a shared footway/cycleway to link with the existing route along Long Lane, which continues along the length of the road to the north. Additionally, this access location would allow for the retention of existing 'Category A' trees which are subject to a Tree Preservation Order (TPO) and cover much of the site frontage to the south of the proposed access location; thus limiting the ecological impact of the access proposals.

5.4.5. Considering both the anticipated level of development (approximately 30 dwellings) and the existing, recorded traffic flows along Long Lane (1,805 two-way, 5-day average daily movements) a simple

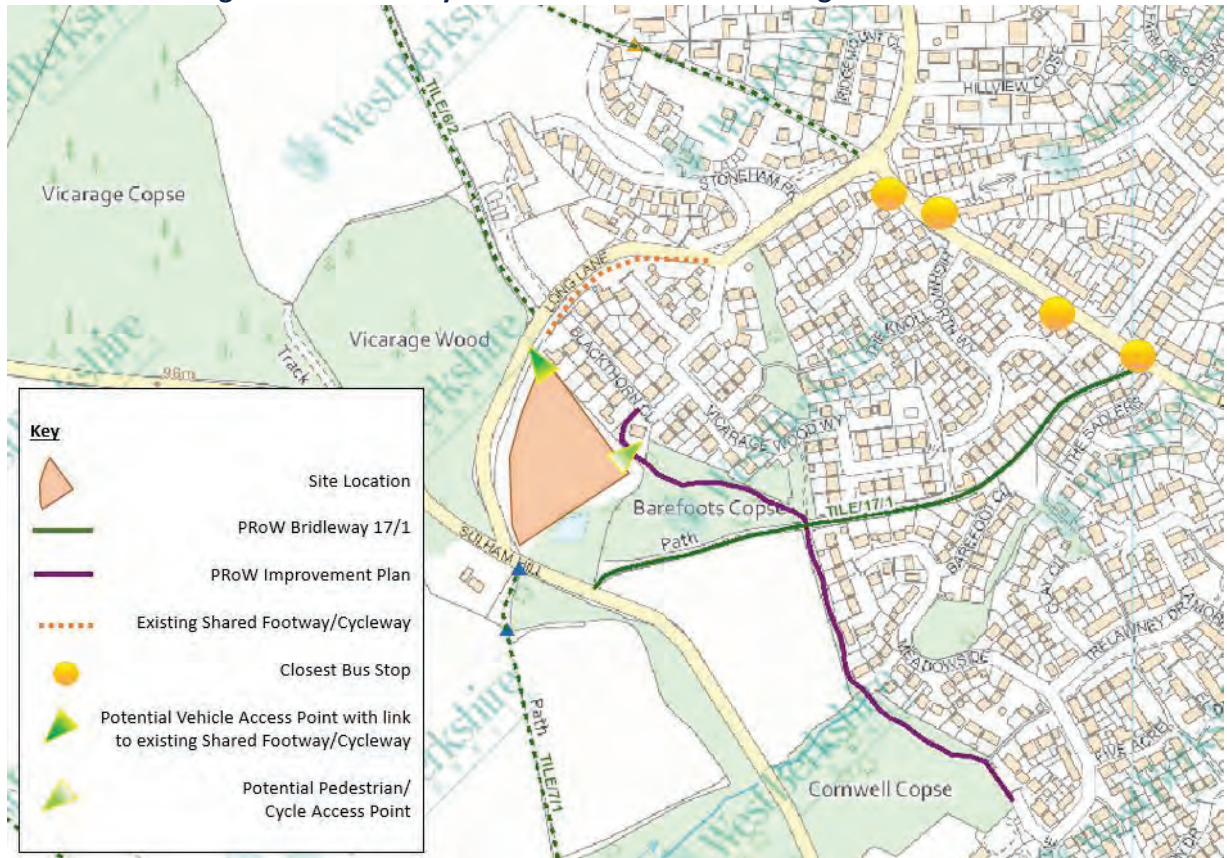
priority junction is considered most suitable to serve any future development at the site, which is in accordance with DMRB CD123: Geometric Design of At-Grade and Signal Controlled Junctions (Version 2.1.0).

- 5.4.6. For the purpose of this initial stage, two potential access options have been developed and are contained within **Appendix B** (drawing number R-23-0010-001 and drawing number R-23-0010-002).
- 5.4.7. Drawing number R-23-00010-001 shows an access which is perpendicular to the carriageway, continuing 15m into the site in a straight alignment. Drawing number R-23-0010-002 shows an access which 'hugs' the site boundary, which would provide a more land efficient access arrangement whilst locating the access further from the high quality tree bank to the south. Either access could be suitably provided in accordance with both Manual for Streets and WBC Local Guidance.
- 5.4.8. Both access options demonstrate carriageway widths of 5.5m with 8.0m radii to accommodate the two-way movement of large cars, as well as for a large refuse vehicle entering and exiting the site in forward gear.
- 5.4.9. To inform the site access arrangements and associated visibility requirements, a 7-day Automatic Traffic Count (ATC) survey was undertaken along Long Lane as previously described in Section 3. The surveys demonstrate 85th percentile speeds of just 25.6mph; below the existing 30mph speed limit.
- 5.4.10. In accordance with recorded 85th percentile speeds, visibility splays have been demonstrated at 2.4m x 34m, which show that suitable visibility can be achieved in both directions in accordance with Manual for Streets requirements.
- 5.4.11. Overall therefore, it is demonstrated that safe and suitable vehicle access to the site could be achieved for this level of residential development, in accordance with both local and national planning policy and design guidance.
- 5.4.12. Should the site be allocated for residential development and a planning application be submitted, the vehicle site access arrangements would be refined and discussed with WBC.

Pedestrian and Cycle Access

- 5.4.13. As demonstrated within the vehicle site access proposals, a 3m wide shared footway/cycleway could be achieved alongside the eastern side of the site access, to link with the existing shared footway/cycleway along Long Lane. This would provide a formal link for non-motorised users, which is on the pedestrian and cycle desire line (being the most direct link) to local amenities including bus stops on Dark Lane.
- 5.4.14. Additionally, there is potential for a further pedestrian link from the south eastern corner of the site to link with Barefoots Copse to the south, providing onward connections, including to the Back Lane PRoW (route 17/1).
- 5.4.15. It may be that improvements are required to the existing Public Right of Way network, and it is anticipated that these would be discussed with WBC and their Public Right of Way team at the time of any planning application, taking account of any updated PRoW Improvement Plan (which is currently being updated and is due for release in 2023).
- 5.4.16. A summary of the potential access arrangements for vehicles, pedestrians and cyclists is included as Figure 11.

Figure 11 – Summary of Potential Site Access Arrangements



5.5. Internal Layout

- 5.5.1. The internal layout would be designed in accordance with both Manual for Streets requirements, and with full consideration of local planning policy, including WBC’s Car Parking requirements which are contained with WBC’s Housing Site Allocations Development Plan Document (DPD), adopted May 2017, which forms part of the current Local Plan. Specific advice on cycle parking is contained within WBC’s Cycle and Motorcycle Advice and Standards for New Development (November 2014).
- 5.5.2. The masterplan would include for the provision of electric vehicle and cycle charging, to ensure that take-up of electric modes is encouraged in accordance with the Government’s climate agenda.
- 5.5.3. The masterplan would ensure that a turning head is provided to ensure that all delivery and servicing vehicle could access and egress the site off Long Lane in forward gear.

5.6. Trip Generation & Development Impact

- 5.6.1. Provisional trip rates have been obtained from the TRICS database (Version 7.9.4) to determine the potential trip generation of this type of residential development in this location. The development schedule is estimated for the purpose of this report, proving a guide to trip rates only and does not constitute the final development scheme which would be the subject of a future planning application. The following parameters have been selected within the TRICS database for the purpose of this assessment:

- Residential – Houses Privately Owned;
- Multi-Modal Surveys;
- Sites in England and Wales only (excluding Greater London)

Evoke Transport

- 20-80 units;
- Weekday Surveys only;
- 'Suburban Locations' and 'Edge of Town' only.

5.6.2. The resulting vehicle trip rates and trip generation based on an indicative 30 residential dwellings is shown in Table 6. The full TRICS outputs are attached at Appendix C.

Table 6 – TRICS Trip Rates and Total Vehicle Trip Generation

| | AM Peak (0800-0900) | | | PM Peak (1700-1800) | | | Daily (0700-1900) | | |
|----------------------------|---------------------|-------|---------|---------------------|-------|---------|-------------------|-------|---------|
| | Arr. | Dep. | Two-Way | Arr. | Dep. | Two-Way | Arr. | Dep. | Two-Way |
| Total Vehicle Trip Rate | 0.166 | 0.366 | 0.532 | 0.355 | 0.187 | 0.542 | 2.563 | 2.603 | 5.166 |
| Trip Generation (30 Units) | 5 | 11 | 16 | 11 | 6 | 17 | 77 | 78 | 155 |

5.6.3. The potential development of around 30 residential dwellings could produce a total of 16 two-way vehicle trips during the morning (08:00-09:00) peak period and 17 two-way vehicle trips during the evening (17:00-18:00) peak period and 155 two-way vehicle trips across a 12-hour day.

5.6.4. The method of travel to work using Census 2011 data has been applied to calculate the potential multi-modal trip generation for the site. The anticipated multi-modal trip generation is outlined in Table 7.

Table 7 – Multi-Modal Trip Generation

| Mode | Census 2011 Mode Share | AM Peak (0800-0900) | | | PM Peak (1700-1800) | | | Daily (12-hour) | | |
|---------------------|------------------------|---------------------|-----------|-----------|---------------------|----------|-----------|-----------------|------------|------------|
| | | Arr. | Dep. | Two-Way | Arr. | Dep. | Two-Way | Arr. | Dep. | Two-Way |
| Rail or Underground | 4.7% | 0 | 1 | 1 | 1 | 0 | 1 | 5 | 5 | 10 |
| Bus | 9.9% | 1 | 2 | 3 | 2 | 1 | 3 | 11 | 11 | 22 |
| Taxi | 0.0% | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Motorcycle | 0.5% | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 1 | 2 |
| Car Driver | 70.9% | 5 | 11 | 16 | 11 | 6 | 17 | 77 | 78 | 155 |
| Car Passenger | 5.6% | 0 | 1 | 1 | 1 | 0 | 1 | 6 | 6 | 12 |
| Bicycle | 2.4% | 0 | 0 | 0 | 0 | 0 | 0 | 3 | 3 | 6 |
| On Foot | 5.8% | 1 | 1 | 2 | 1 | 1 | 2 | 6 | 6 | 12 |
| Other | 0.2% | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| TOTAL | 100.00% | 7 | 16 | 23 | 16 | 8 | 24 | 109 | 110 | 219 |

5.6.5. The potential development of around 30 dwellings could produce a total of around 23-24 'total people' movements in the peak periods, of which three-four would be undertaken by public transport (primarily by bus), one-two would be undertaken by active modes and one would be undertaken by car passenger (car share).

5.6.6. It is recognised that, whilst an indication of potential 'baseline' travel modes, any new data, for example relevant 2021 Census data (alongside any emerging trends or other available data) or any updated TRICS data, will need to be considered for any future application at the site and the resulting development impact by all modes fully assessed.

5.7. Development Impact and Potential Mitigation Requirements

Vehicle Impact

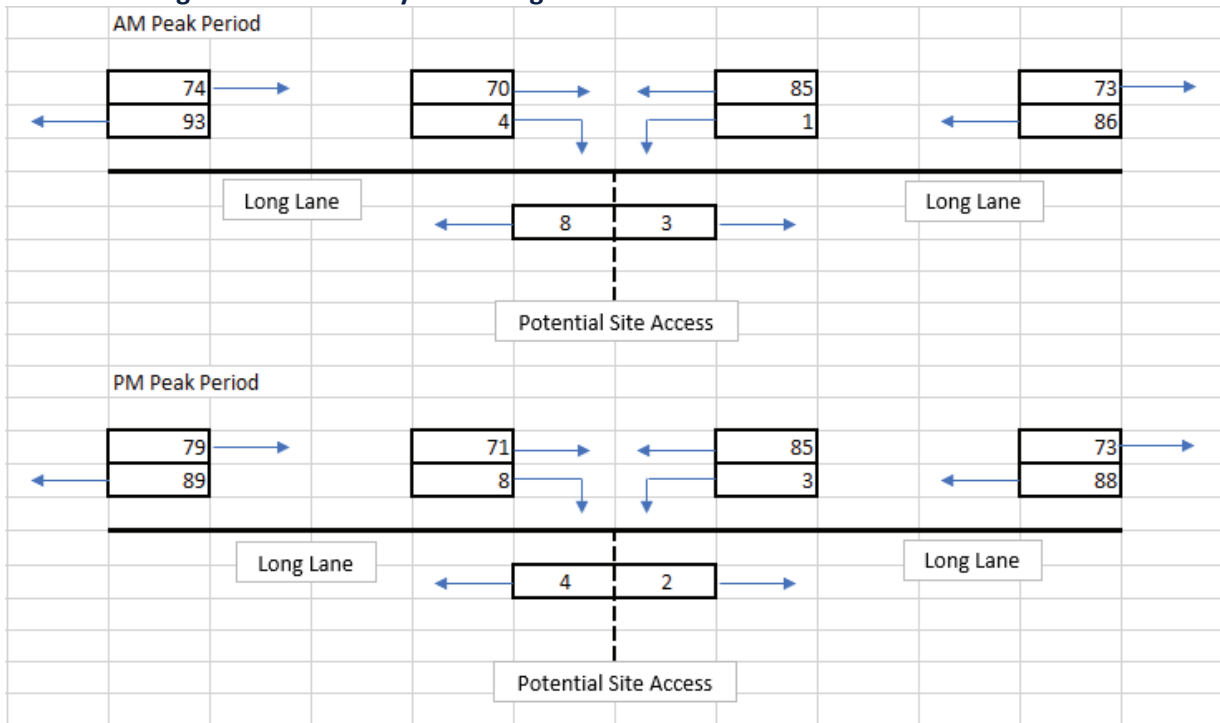
5.7.1. As part of any future planning application, a junction capacity assessment would be undertaken of the site access junction to ensure the potential development would not result in a detrimental impact on the highway network. However, given the potential development is anticipated to produce a total of

16 two-way vehicular trips in the AM peak period and 17 vehicular trips in the PM peak period, compared with five-day (weekday) average flows along Long Lane of around 154 two-way movements during the AM Peak and 156 two-way movements during the PM Peak, it is considered that the potential access junction(s) type and location would operate well within their theoretical capacity, with sufficient visibility in both directions in accordance with Manual for Streets and DMRB guidance.

Potential Road Widening

- 5.7.2. It is noted that WBC have previously expressed the need for Long Lane to be widened if the site were to be allocated for residential development. Previous correspondence between Glanville Consultants and WBC (in 2014) demonstrated that WBC considered that up to 74% of traffic to and from the site could travel to and from Sulham Hill to the south; thus will route along Long Lane, along the site frontage.
- 5.7.3. WBC previously concluded that improvements could have been recommended to allow additional traffic to pass easier in places and that, with improvements, the highway authority may have withdrawn its objection.
- 5.7.4. In order to understand the potential impact of a residential development of 30 units in this location, the potential trips generated by the site have been assessed against the recorded morning and evening peak-hour recorded flows along Long Lane, as demonstrated in Figure 12.

Figure 12 – Summary of Existing and Potential Vehicle Movements



- 5.7.5. Using a percentage split of 74% of movements to and from the site travelling to and from the site to the south and the remaining 26% travelling to and from the north, a total of eight outbound and four inbound movements are anticipated in the AM Peak period (0800-0900) to and from the south, with four outbound and eight inbound movements anticipated in the PM Peak period (1700-1800).
- 5.7.6. A total of 12 two-way movements during the peak hours represents an additional two-way movement every five minutes, and a maximum one-way traffic flow of eight vehicles would represent an additional

movement every circa 7.5 minutes, thus the potential for conflicting movements that could not be accommodated within existing passing places along Long Lane is limited.

- 5.7.7. Considering the cumulative impact of the potential development alongside existing traffic movements would result in an anticipated 167-168 two-way movements during the peak hours, or circa three two-way trips per minute (one every 20 seconds or so). Considering the length of Long Lane across the site frontage of around 200m and the recorded 85th percentile speeds of 25.6mph, gives an approximate journey time of around 17 seconds to travel along Long Lane. It is therefore unlikely that two vehicles would be required to pass along Long Lane in the vicinity of the site and, in any case, there are various locations where the passing of two vehicles is achievable.
- 5.7.8. The Walker et al 'LR71 Single Track Roads in the Scottish Highlands' (1967) study found that the capacity of a single track road with passing places was between 100-220 vehicles per hour depending on the alignment. The Burrow 'Delays on single-lane roads with passing places' (1977) study found that the capacity of a single track road with passing places was between 100-300 vehicles per hour depending on the number of passing spaces. Whilst both these documents are old, the evidence base is still applicable and these figures provide a best estimate of the capacity of a single track road. An additional study was undertaken by Somerset County Council in 2012 by Richard Sweet entitled 'The capacity of single-track rural lanes: an initial investigation' (2012). This study also found that the effective capacity of a single-track lane with passing spaces lies somewhere between 100-300 vehicles per hour.
- 5.7.9. The potential development alongside existing traffic movements would result in an anticipated 167-168 two-way movements during the peak hours and therefore based on the upper limit of 300 vehicles per hour it is considered that the existing alignment of Long Lane allows for sufficient passing places to safely operate, evidenced by the analysis of the injury accident data presented in Section 3.8.
- 5.7.10. Nonetheless, a further assessment has been undertaken to examine the existing provision of passing places along Long Lane and is shown in **Appendix D**. This shows that there are numerous locations along Long Lane for two cars to pass each other. The provision of the site access junction offers an additional informal passing place. In the event that WBC consider there is a need to establish additional passing place improvements, then this could be explored at application stage.

Non-Vehicle movements

- 5.7.11. Considering non-motorised vehicle movements, the development is likely to result in around six two-way trips taken by walking, cycling or public transport during the Peak periods. Given the proximity of the site to local bus stops, and the accessibility of the site to Tilehurst Train Station by walking, cycling or by bus, it is likely that all trips by sustainable modes can be made without any use of the car.
- 5.7.12. The proposal to link the site to the existing shared footway/cycleway which continues along Long Lane to the north would support access by sustainable modes, and the additional potential for a further link to the south east of the site will provide alternative access options for pedestrians and cyclists (and onwards to the existing Public Right of Way network will further enhance the sustainability credentials of the site, ensuring that safe access is available to all potential site users.
- 5.7.13. Through any future planning application at the site, any required mitigation measures would be discussed and agreed with WBC highway officers, to ensure that the site does not result in an unacceptable impact on highway safety, or a 'severe' residual cumulative impact on the road network in accordance with the NPPF.

5.8. Summary

- The proposed allocation site is likely to support the construction of circa 30 dwellings;

Evoke Transport

- Vehicle access can be suitably achieved at the site, with two provisional site access design options provided which both demonstrate a priority junction which is capable of supporting access for simultaneous movement of two cars, and access by large vehicles;
- Visibility from the potential access locations can be achieved at 2.4m x 34m in accordance with Manual for Streets requirements for the recorded 85th percentile speeds (25.6mph).
- Vehicle site access will be subject to further analysis at any application stage which will include a capacity assessment (if required by WBC);
- Should passing places be required by WBC, the location and extent of these can be discussed and agreed through any future planning application at the site;
- There are opportunities to link the site to the surrounding residential area by foot and cycle, including linking to the existing shared footway/cycleway along Long Lane, and through further connections to the existing footpath to the east, which link through to the wider footpath network, with routes directly to local bus stops to support end-to-end trips by sustainable modes;
- A provisional trip generation assessment demonstrates that the site could generate up to 23-24 two-way total people movements in the peak hours, including 16-17 by single occupancy vehicle and six by sustainable modes.
- Through any future application at the site, any required mitigation and/or improvement measures would be discussed and agreed with WBC.

6. Summary and Conclusions

- 6.1.1. This Transport and Highways Appraisal has been prepared by Evoke to support the promotion of a parcel of land located to the east of Long Lane, Tilehurst through the updated West Berkshire Local Plan as being suitable to support the development of approximately 30 residential units.

Accessibility

- 6.1.2. The site is well located in relation to the existing built up suburb of Tilehurst, including bus stops, schools, employment opportunities and other local shops and services. The residential nature of the site would integrate well with the existing nature of the surrounding area.
- 6.1.3. Additionally, the existing foot and cycle network, including the existing shared footway/cycleway along Long Lane, presents a significant opportunity to link the site via a traffic free route to the surrounding area.

Road Safety

- 6.1.4. No highway safety issues have been identified in the immediate vicinity of the site. There are not considered to be any grounds on highway safety which would prevent the future development of the site. However, detailed collision data will be subject to further investigation as part of any planning application for the site.

Site Access

- 6.1.5. Vehicle access can be suitably achieved at the site, with two provisional site access design options provided supported by swept path analysis and a visibility splay assessment based on the recorded road speeds in the vicinity of the site. Vehicle site access will be subject to further analysis at application stage which will include a capacity assessment (if required by WBC).
- 6.1.6. There are opportunities to link the site to the surrounding residential area by foot and cycle, through connections to the existing shared footway/cycleway and through links to the wider footpath network, with routes directly to local bus stops to support end-to-end trips by sustainable modes.
- 6.1.7. Through any future application at the site, any required mitigation and/or improvement measures would be discussed and agreed with WBC.

Trip Generation and Impact

- 6.1.8. Due to the site's accessibility by sustainable modes of transport, there will be opportunity to encourage a shift away from private car use. It is not considered that the proposed trip generation would result in a severe residual impact on the surrounding highway network, with any required mitigation works investigated and discussed with WBC as part of any planning application.
- 6.1.9. It is considered that there is existing sufficient provision of passing places along Long Lane to support the minor uplift in traffic associated with the proposals. However the need for and extent of any additional passing places along Long Lane can be discussed and agreed with WBC through any future planning application.

Evoked Transport

Summary

- 6.1.10. Taking into consideration the highways and transport appraisals outlined above it is considered that safe, suitable access can be provided to the site which will ensure that the site could be unlocked for the future residential development.
- 6.1.11. Should the site be developed for residential development then a Transport Statement/Assessment would be produced to fully evaluate the impacts and, if appropriate, identify mitigation measures to address any potential issues.
- 6.1.12. Nonetheless there is considered to be no transport or highway reasons for the site not to be allocated/approved for future residential development.

Appendix A – ATC Outputs



SITE: Long Lane

LOCATION: Attached to telegraph pole

GRID REFERENCE: 51.465404, -1.059191

DIRECTION: NORTHBOUND

SPEED LIMIT: 30

| Hour | Tue | Wed | Thu | Fri | Sat | Sun | Mon | Averages | |
|---------------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|----------|-------|
| | 24-Jan | 25-Jan | 26-Jan | 27-Jan | 28-Jan | 29-Jan | 30-Jan | 1-5. | 1-7. |
| 0000-0100 | 2 | 2 | 0 | 1 | 1 | 5 | 1 | 1.2 | 1.7 |
| 0100-0200 | 0 | 0 | 1 | 0 | 0 | 0 | 1 | 0.4 | 0.3 |
| 0200-0300 | 0 | 1 | 0 | 1 | 0 | 0 | 1 | 0.6 | 0.4 |
| 0300-0400 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 0400-0500 | 1 | 1 | 0 | 0 | 1 | 0 | 1 | 0.6 | 0.6 |
| 0500-0600 | 3 | 3 | 5 | 5 | 4 | 2 | 1 | 3.4 | 3.3 |
| 0600-0700 | 18 | 15 | 20 | 12 | 6 | 4 | 6 | 14.2 | 11.6 |
| 0700-0800 | 59 | 59 | 63 | 60 | 28 | 11 | 15 | 51.2 | 42.1 |
| 0800-0900 | 69 | 66 | 65 | 66 | 43 | 35 | 29 | 59 | 53.3 |
| 0900-1000 | 76 | 67 | 74 | 66 | 81 | 44 | 57 | 68 | 66.4 |
| 1000-1100 | 72 | 53 | 72 | 75 | 74 | 63 | 70 | 68.4 | 68.4 |
| 1100-1200 | 57 | 59 | 64 | 84 | 76 | 61 | 86 | 70 | 69.6 |
| 1200-1300 | 68 | 71 | 69 | 79 | 83 | 68 | 77 | 72.8 | 73.6 |
| 1300-1400 | 73 | 69 | 66 | 75 | 54 | 49 | 55 | 67.6 | 63 |
| 1400-1500 | 61 | 58 | 71 | 71 | 79 | 47 | 46 | 61.4 | 61.9 |
| 1500-1600 | 65 | 64 | 67 | 75 | 75 | 44 | 52 | 64.6 | 63.1 |
| 1600-1700 | 62 | 72 | 61 | 90 | 95 | 59 | 59 | 68.8 | 71.1 |
| 1700-1800 | 65 | 61 | 69 | 76 | 49 | 56 | 54 | 65 | 61.4 |
| 1800-1900 | 47 | 42 | 36 | 55 | 52 | 29 | 36 | 43.2 | 42.4 |
| 1900-2000 | 42 | 25 | 34 | 34 | 37 | 28 | 24 | 31.8 | 32 |
| 2000-2100 | 27 | 9 | 21 | 35 | 30 | 20 | 23 | 23 | 23.6 |
| 2100-2200 | 11 | 13 | 17 | 22 | 15 | 8 | 17 | 16 | 14.7 |
| 2200-2300 | 9 | 9 | 12 | 6 | 11 | 8 | 4 | 8 | 8.4 |
| 2300-2400 | 1 | 2 | 1 | 5 | 4 | 3 | 1 | 2 | 2.4 |
| Totals | | | | | | | | | |
| 0700-1900 | 774 | 741 | 777 | 872 | 789 | 566 | 636 | 760 | 736.4 |
| 0600-2200 | 872 | 803 | 869 | 975 | 877 | 626 | 706 | 845 | 818.3 |
| 0600-0000 | 882 | 814 | 882 | 986 | 892 | 637 | 711 | 855 | 829.1 |
| 0000-0000 | 888 | 821 | 888 | 993 | 898 | 644 | 716 | 861.2 | 835.4 |
| AM Peak | 900 | 900 | 900 | 1100 | 900 | 1000 | 1100 | | |
| | 76 | 67 | 74 | 84 | 81 | 63 | 86 | | |
| PM Peak | 1300 | 1600 | 1400 | 1600 | 1600 | 1200 | 1200 | | |
| | 73 | 72 | 71 | 90 | 95 | 68 | 77 | | |



SITE: Long Lane

LOCATION: Attached to telegraph pole

GRID REFERENCE: 51.465404, -1.059191

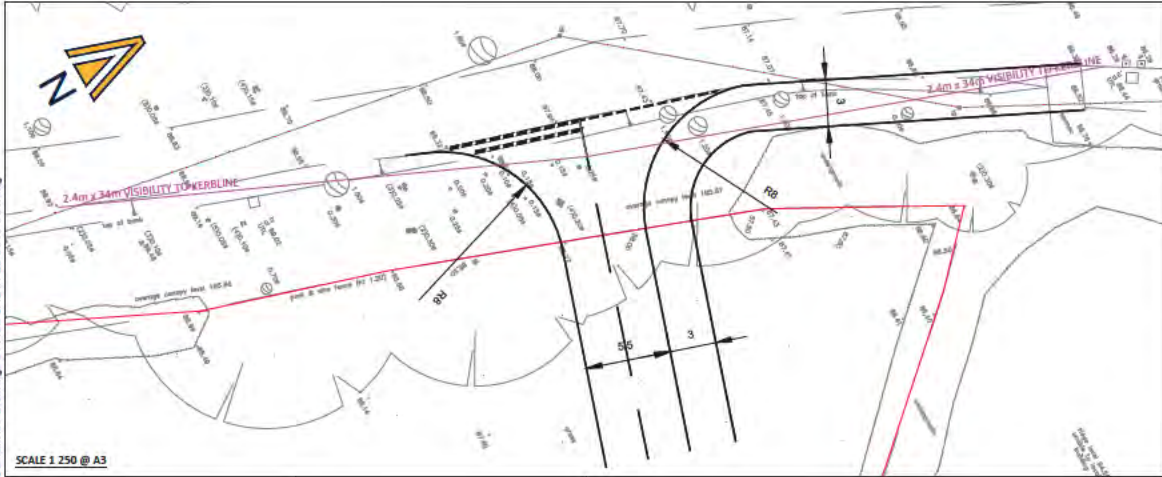
DIRECTION: SOUTHBOUND

SPEED LIMIT: 30

| Hour | Tue | Wed | Thu | Fri | Sat | Sun | Mon | Averages | |
|---------------|--------|--------|--------|--------|--------|--------|--------|----------|-------|
| | 24-Jan | 25-Jan | 26-Jan | 27-Jan | 28-Jan | 29-Jan | 30-Jan | 1-5. | 1-7. |
| 0000-0100 | 0 | 0 | 1 | 1 | 1 | 4 | 1 | 0.6 | 1.1 |
| 0100-0200 | 0 | 0 | 0 | 1 | 0 | 0 | 1 | 0.4 | 0.3 |
| 0200-0300 | 0 | 1 | 0 | 1 | 0 | 0 | 3 | 1 | 0.7 |
| 0300-0400 | 1 | 0 | 2 | 1 | 2 | 0 | 1 | 1 | 1 |
| 0400-0500 | 1 | 1 | 0 | 0 | 0 | 0 | 0 | 0.4 | 0.3 |
| 0500-0600 | 5 | 5 | 7 | 6 | 1 | 0 | 0 | 4.6 | 3.4 |
| 0600-0700 | 13 | 15 | 12 | 9 | 5 | 3 | 5 | 10.8 | 8.9 |
| 0700-0800 | 46 | 33 | 44 | 35 | 30 | 6 | 16 | 34.8 | 30 |
| 0800-0900 | 70 | 77 | 76 | 67 | 41 | 32 | 30 | 64 | 56.1 |
| 0900-1000 | 77 | 68 | 55 | 80 | 82 | 43 | 49 | 65.8 | 64.9 |
| 1000-1100 | 72 | 75 | 60 | 93 | 92 | 70 | 84 | 76.8 | 78 |
| 1100-1200 | 68 | 62 | 88 | 72 | 107 | 89 | 107 | 79.4 | 84.7 |
| 1200-1300 | 76 | 75 | 68 | 86 | 99 | 88 | 85 | 78 | 82.4 |
| 1300-1400 | 64 | 76 | 72 | 78 | 83 | 63 | 71 | 72.2 | 72.4 |
| 1400-1500 | 60 | 66 | 60 | 102 | 91 | 60 | 66 | 70.8 | 72.1 |
| 1500-1600 | 98 | 87 | 89 | 92 | 61 | 48 | 61 | 85.4 | 76.6 |
| 1600-1700 | 90 | 116 | 98 | 99 | 75 | 55 | 62 | 93 | 85 |
| 1700-1800 | 88 | 66 | 90 | 89 | 63 | 65 | 50 | 76.6 | 73 |
| 1800-1900 | 55 | 54 | 63 | 64 | 62 | 31 | 45 | 56.2 | 53.4 |
| 1900-2000 | 40 | 33 | 38 | 29 | 33 | 30 | 33 | 34.6 | 33.7 |
| 2000-2100 | 17 | 13 | 21 | 25 | 32 | 20 | 14 | 18 | 20.3 |
| 2100-2200 | 11 | 8 | 12 | 20 | 6 | 6 | 9 | 12 | 10.3 |
| 2200-2300 | 8 | 5 | 5 | 5 | 13 | 8 | 4 | 5.4 | 6.9 |
| 2300-2400 | 2 | 1 | 2 | 2 | 7 | 4 | 1 | 1.6 | 2.7 |
| Totals | | | | | | | | | |
| 0700-1900 | 864 | 855 | 863 | 957 | 886 | 650 | 726 | 853 | 828.7 |
| 0600-2200 | 945 | 924 | 946 | 1040 | 962 | 709 | 787 | 928.4 | 901.9 |
| 0600-0000 | 955 | 930 | 953 | 1047 | 982 | 721 | 792 | 935.4 | 911.4 |
| 0000-0000 | 962 | 937 | 963 | 1057 | 986 | 725 | 798 | 943.4 | 918.3 |
| AM Peak | 900 | 800 | 1100 | 1000 | 1100 | 1100 | 1100 | | |
| | 77 | 77 | 88 | 93 | 107 | 89 | 107 | | |
| PM Peak | 1500 | 1600 | 1600 | 1400 | 1200 | 1200 | 1200 | | |
| | 98 | 116 | 98 | 102 | 99 | 88 | 85 | | |

Appendix B – Potential Site Access Options

C:\Users\bar11\Documents\Evoke Transport\Evoke Projects - Documents\2023\16-23-0010 Long Lane, Suham\50 Drawings\1. A subCAD\16-23-0010-001.dwg



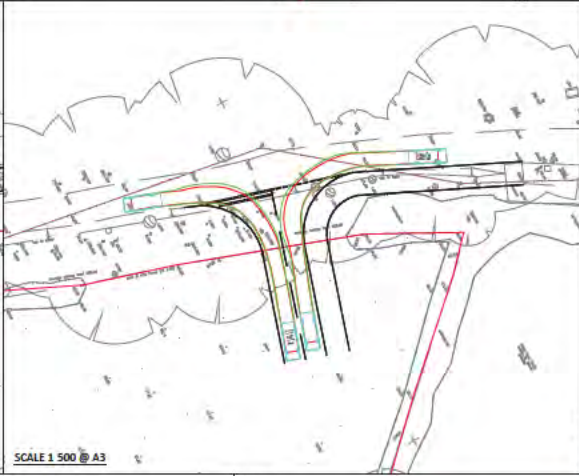
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SCALE 1 500 @ A3



SCALE 1 500 @ A3

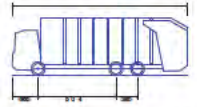


SCALE 1 500 @ A3

NOTES

1. DO NOT SCALE FROM THIS DRAWING. WORK FROM FIGURED DIMENSIONS ONLY.
2. EVOKE TRANSPORT PLANNING CONSULTANTS LIMITED ACCEPTS NO RESPONSIBILITY FOR THE ACCURACY OF THIRD PARTY INFORMATION - THIS MUST BE TREATED AS INDICATIVE ONLY.
3. VISIBILITY SPLAYS ARE BASED ON THE RECORDED 85%ILE SPEEDS OF 25.6MPH.
4. HIGHWAY BOUNDARY MAPPING, RECEIVED BY WBC, INDICATIVELY DEMONSTRATED IN RED.

LARGE REFUSE VEHICLE PROFILE



Phoenix 2 Duo Recycler (P2-15W w th Elite 6x4 chassis)
 Overall Length 11.220m
 Overall Width 2.530m
 Overall Body Height 3.756m
 Min Body Ground Clearance 0.302m
 Track Width 2.530m
 Lock to lock time 4.00s
 Kerb to Kerb Turning Radius 11.550m

CAR VEHICLE PROFILE



Estate Car
 Overall Length 4.845m
 Overall Width 1.750m
 Overall Body Height 1.424m
 Min Body Ground Clearance 0.189m
 Max Track Width 1.655m
 Lock to lock time 4.00s
 Kerb to Kerb Turning Radius 4.950m

| | | | | |
|-----|-------------|----|-----|----------|
| - | FIRST ISSUE | BW | DF | 27.02.23 |
| Rev | Amendment | Dm | App | Date |

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| Scale | Job No | |
| AS SHOWN | R-23-0010 | |
| Drawing No | | Rev |
| R-23-0010-001 | | - |

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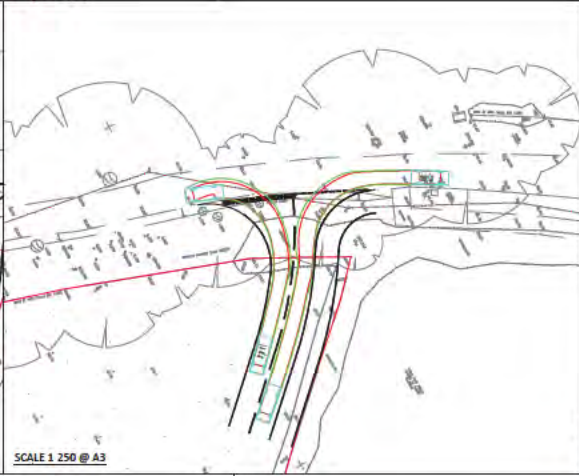
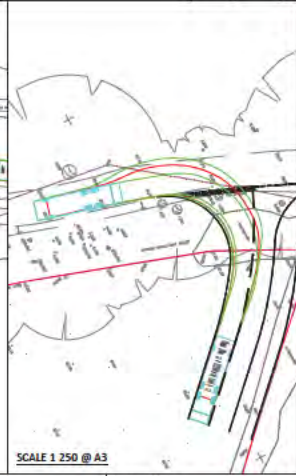
Evoke Transport Consultants Limited
 R+ Building
 2 Blagrove Street
 Reading, RG1 1AZ

Telephone 01183 800 182
 E info@evoketransport.co.uk
 W www.evoketransport.co.uk

| | |
|---------------|-------------------------------------|
| Project Name | LONG LANE TILEHURST |
| Client | DARCLIFFE HOMES |
| Drawing Title | SITE ACCESS ARRANGEMENT OPTION 1 |

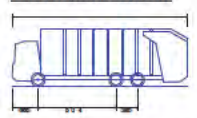
| | |
|---------------|-------------------------------------|
| Project Name | LONG LANE TILEHURST |
| Client | DARCLIFFE HOMES |
| Drawing Title | SITE ACCESS ARRANGEMENT OPTION 1 |

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- NOTES**
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 - VISIBILITY SPLAYS ARE BASED ON THE RECORDED 85%ILE SPEEDS OF 25.6MPH.
 - HIGHWAY BOUNDARY MAPPING, RECEIVED FROM WBC, INDICATIVELY SHOWN IN RED.

LARGE REFUSE VEHICLE PROFILE



Phoenix 2 Duo Recycler (P2-15W w th Elite 6x4 chassis)
 Overall Length 11.220m
 Overall Width 2.530m
 Overall Body Height 3.756m
 Min Body Ground Clearance 0.362m
 Track Width 2.530m
 Lock to lock time 4.00s
 Kerb to Kerb Turning Radius 11.550m

CAR VEHICLE PROFILE



Estale Car
 Overall Length 4.845m
 Overall Width 1.750m
 Overall Body Height 1.424m
 Min Body Ground Clearance 0.189m
 Max Track Width 1.655m
 Lock to lock time 4.00s
 Kerb to Kerb Turning Radius 4.950m

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| - | FIRST ISSUE | BW | DF | 27.02.23 |
| Rev | Amendment | Dm | App | Date |

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| Scale | Job No | |
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| R-23-0010-002 | | - |

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 W www.evoketransport.co.uk

| | |
|---------------|---|
| Project Name | LONG LANE TILEHURST |
| Client | DARCLIFFE HOMES |
| Drawing Title | SITE ACCESS ARRANGEMENT OPTION 2 |

Appendix C – TRICS Outputs

TRIP RATE CALCULATION SELECTION PARAMETERS:

Land Use : 03 - RESIDENTIAL
 Category : A - HOUSES PRIVATELY OWNED

TOTAL VEHICLESSelected regions and areas:

| | | |
|-----------|---|--------|
| 02 | SOUTH EAST | |
| | CT CENTRAL BEDFORDSHIRE | 1 days |
| | HC HAMPSHIRE | 5 days |
| | KC KENT | 1 days |
| | SC SURREY | 2 days |
| | WS WEST SUSSEX | 1 days |
| 03 | SOUTH WEST | |
| | BC BOURNEMOUTH CHRISTCHURCH & POOLE | 1 days |
| | DC DORSET | 1 days |
| | DV DEVON | 1 days |
| | SD SWINDON | 1 days |
| | SM SOMERSET | 1 days |
| | TB TORBAY | 1 days |
| 04 | EAST ANGLIA | |
| | NF NORFOLK | 6 days |
| | PB PETERBOROUGH | 1 days |
| | SF SUFFOLK | 1 days |
| 05 | EAST MIDLANDS | |
| | NT NOTTINGHAMSHIRE | 1 days |
| 06 | WEST MIDLANDS | |
| | ST STAFFORDSHIRE | 1 days |
| | WK WARWICKSHIRE | 2 days |
| 07 | YORKSHIRE & NORTH LINCOLNSHIRE | |
| | NY NORTH YORKSHIRE | 1 days |
| 08 | NORTH WEST | |
| | EC CHESHIRE EAST | 1 days |
| | LC LANCASHIRE | 1 days |
| 09 | NORTH | |
| | DH DURHAM | 1 days |
| 10 | WALES | |
| | PS POWYS | 1 days |

This section displays the number of survey days per TRICS® sub-region in the selected set

Primary Filtering selection:

This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.

Parameter: No of Dwellings
 Actual Range: 23 to 80 (units:)
 Range Selected by User: 20 to 80 (units:)

Parking Spaces Range: All Surveys Included

Parking Spaces per Dwelling Range: All Surveys Included

Bedrooms per Dwelling Range: All Surveys Included

Percentage of dwellings privately owned: All Surveys Included

Public Transport Provision:

Selection by: Include all surveys

Date Range: 01/01/14 to 14/10/22

This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.

Selected survey days:

| | |
|-----------|--------|
| Monday | 6 days |
| Tuesday | 6 days |
| Wednesday | 8 days |
| Thursday | 7 days |
| Friday | 6 days |

This data displays the number of selected surveys by day of the week.

Selected survey types:

| | |
|-----------------------|---------|
| Manual count | 32 days |
| Directional ATC Count | 1 days |

This data displays the number of manual classified surveys and the number of unclassified ATC surveys, the total adding up to the overall number of surveys in the selected set. Manual surveys are undertaken using staff, whilst ATC surveys are undertaken using machines.

Selected Locations:

| | |
|------------------------------------|----|
| Suburban Area (PPS6 Out of Centre) | 9 |
| Edge of Town | 24 |

This data displays the number of surveys per main location category within the selected set. The main location categories consist of Free Standing, Edge of Town, Suburban Area, Neighbourhood Centre, Edge of Town Centre, Town Centre and Not Known.

Selected Location Sub Categories:

| | |
|------------------|----|
| Residential Zone | 30 |
| Out of Town | 1 |
| No Sub Category | 2 |

This data displays the number of surveys per location sub-category within the selected set. The location sub-categories consist of Commercial Zone, Industrial Zone, Development Zone, Residential Zone, Retail Zone, Built-Up Zone, Village, Out of Town, High Street and No Sub Category.

Inclusion of Servicing Vehicles Counts:

| | |
|-----------------------------|--------------------|
| Servicing vehicles Included | 10 days - Selected |
| Servicing vehicles Excluded | 31 days - Selected |

Secondary Filtering selection:Use Class:

C3 33 days

This data displays the number of surveys per Use Class classification within the selected set. The Use Classes Order (England) 2020 has been used for this purpose, which can be found within the Library module of TRICS®.

Population within 500m Range:

All Surveys Included

Secondary Filtering selection (Cont.):Population within 1 mile:

| | |
|------------------|---------|
| 1,001 to 5,000 | 2 days |
| 5,001 to 10,000 | 10 days |
| 10,001 to 15,000 | 9 days |
| 15,001 to 20,000 | 4 days |
| 20,001 to 25,000 | 4 days |
| 25,001 to 50,000 | 4 days |

This data displays the number of selected surveys within stated 1-mile radii of population.

Population within 5 miles:

| | |
|--------------------|---------|
| 5,001 to 25,000 | 6 days |
| 25,001 to 50,000 | 4 days |
| 50,001 to 75,000 | 3 days |
| 75,001 to 100,000 | 5 days |
| 100,001 to 125,000 | 2 days |
| 125,001 to 250,000 | 10 days |
| 250,001 to 500,000 | 3 days |

This data displays the number of selected surveys within stated 5-mile radii of population.

Car ownership within 5 miles:

| | |
|------------|---------|
| 0.6 to 1.0 | 5 days |
| 1.1 to 1.5 | 27 days |
| 1.6 to 2.0 | 1 days |

This data displays the number of selected surveys within stated ranges of average cars owned per residential dwelling, within a radius of 5-miles of selected survey sites.

Travel Plan:

| | |
|-----|---------|
| Yes | 15 days |
| No | 18 days |

This data displays the number of surveys within the selected set that were undertaken at sites with Travel Plans in place, and the number of surveys that were undertaken at sites without Travel Plans.

PTAL Rating:

| | |
|-----------------|---------|
| No PTAL Present | 33 days |
|-----------------|---------|

This data displays the number of selected surveys with PTAL Ratings.

LIST OF SITES relevant to selection parameters

| | | | |
|----------|------------------------------------|-------------------------------------|---|
| 1 | BC-03-A-02 | BUNGALOWS | BOURNEMOUTH CHRISTCHURCH & POOLE |
| | HURSTDENE ROAD | | |
| | BOURNEMOUTH | | |
| | CASTLE LANE WEST | | |
| | Edge of Town | | |
| | Residential Zone | | |
| | Total No of Dwellings: | 28 | |
| | Survey date: MONDAY | 24/03/14 | Survey Type: MANUAL |
| 2 | CT-03-A-01 | MIXED HOUSES | CENTRAL BEDFORDSHIRE |
| | ARLESEY ROAD | | |
| | STOTFOLD | | |
| | Edge of Town | | |
| | Residential Zone | | |
| | Total No of Dwellings: | 46 | |
| | Survey date: WEDNESDAY | 22/06/22 | Survey Type: MANUAL |
| 3 | DC-03-A-09 | MIXED HOUSES | DORSET |
| | A350 | | |
| | SHAFTESBURY | | |
| | Edge of Town | | |
| | No Sub Category | | |
| | Total No of Dwellings: | 50 | |
| | Survey date: FRIDAY | 19/11/21 | Survey Type: MANUAL |
| 4 | DH-03-A-03 | SEMI-DETACHED & TERRACED | DURHAM |
| | PILGRIMS WAY | | |
| | DURHAM | | |
| | Edge of Town | | |
| | Residential Zone | | |
| | Total No of Dwellings: | 57 | |
| | Survey date: FRIDAY | 19/10/18 | Survey Type: MANUAL |
| 5 | DV-03-A-03 | TERRACED & SEMI DETACHED | DEVON |
| | LOWER BRAND LANE | | |
| | HONITON | | |
| | Suburban Area (PPS6 Out of Centre) | | |
| | Residential Zone | | |
| | Total No of Dwellings: | 70 | |
| | Survey date: MONDAY | 28/09/15 | Survey Type: MANUAL |
| 6 | EC-03-A-06 | TERRACED HOUSES | CHESHIRE EAST |
| | GREYSTOKE ROAD | | |
| | MACCLESFIELD | | |
| | HURDSFIELD | | |
| | Edge of Town | | |
| | Residential Zone | | |
| | Total No of Dwellings: | 24 | |
| | Survey date: MONDAY | 24/11/14 | Survey Type: MANUAL |
| 7 | HC-03-A-21 | TERRACED & SEMI-DETACHED | HAMPSHIRE |
| | PRIESTLEY ROAD | | |
| | BASINGSTOKE | | |
| | HOUNDMILLS | | |
| | Edge of Town | | |
| | Residential Zone | | |
| | Total No of Dwellings: | 39 | |
| | Survey date: TUESDAY | 13/11/18 | Survey Type: MANUAL |

LIST OF SITES relevant to selection parameters (Cont.)

| | | | |
|-----------|---|---------------------------------|---------------------|
| 8 | HC-03-A-22 | MIXED HOUSES | HAMPSHIRE |
| | BOW LAKE GARDENS NEAR EASTLEIGH BISHOPSTOKE Edge of Town Residential Zone Total No of Dwellings: 40 Survey date: WEDNESDAY 31/10/18 | | Survey Type: MANUAL |
| 9 | HC-03-A-23 | HOUSES & FLATS | HAMPSHIRE |
| | CANADA WAY LIPHOOK Suburban Area (PPS6 Out of Centre) Residential Zone Total No of Dwellings: 62 Survey date: TUESDAY 19/11/19 | | Survey Type: MANUAL |
| 10 | HC-03-A-27 | MIXED HOUSES | HAMPSHIRE |
| | DAIRY ROAD ANDOVER Edge of Town Residential Zone Total No of Dwellings: 73 Survey date: TUESDAY 16/11/21 | | Survey Type: MANUAL |
| 11 | HC-03-A-31 | MIXED HOUSES & FLATS | HAMPSHIRE |
| | KILN ROAD LIPHOOK Edge of Town Residential Zone Total No of Dwellings: 44 Survey date: FRIDAY 07/10/22 | | Survey Type: MANUAL |
| 12 | KC-03-A-03 | MIXED HOUSES & FLATS | KENT |
| | HYTHE ROAD ASHFORD WILLESBOROUGH Suburban Area (PPS6 Out of Centre) Residential Zone Total No of Dwellings: 51 Survey date: THURSDAY 14/07/16 | | Survey Type: MANUAL |
| 13 | LC-03-A-31 | DETACHED HOUSES | LANCASHIRE |
| | GREENSIDE PRESTON COTTAM Edge of Town Residential Zone Total No of Dwellings: 32 Survey date: FRIDAY 17/11/17 | | Survey Type: MANUAL |
| 14 | NF-03-A-05 | MIXED HOUSES | NORFOLK |
| | HEATH DRIVE HOLT Edge of Town Residential Zone Total No of Dwellings: 40 Survey date: THURSDAY 19/09/19 | | Survey Type: MANUAL |
| 15 | NF-03-A-25 | MIXED HOUSES & FLATS | NORFOLK |
| | WOODFARM LANE GORLESTON-ON-SEA Edge of Town Residential Zone Total No of Dwellings: 55 Survey date: TUESDAY 21/09/21 | | Survey Type: MANUAL |

LIST OF SITES relevant to selection parameters (Cont.)

| | | | | |
|-----------|--|---------------------------------|--|---|
| 16 | NF-03-A-34 | MIXED HOUSES | | NORFOLK |
| | NORWICH ROAD SWAFFHAM | | | |
| | Edge of Town Out of Town | | | |
| | Total No of Dwellings: | 80 | | |
| | Survey date: <i>TUESDAY</i> | <i>27/09/22</i> | | <i>Survey Type: MANUAL</i> |
| 17 | NF-03-A-36 | MIXED HOUSES | | NORFOLK |
| | LONDON ROAD WYMONDHAM | | | |
| | Edge of Town No Sub Category | | | |
| | Total No of Dwellings: | 75 | | |
| | Survey date: <i>THURSDAY</i> | <i>29/09/22</i> | | <i>Survey Type: MANUAL</i> |
| 18 | NF-03-A-37 | MIXED HOUSES | | NORFOLK |
| | GREENFIELDS ROAD DEREHAM | | | |
| | Edge of Town Residential Zone | | | |
| | Total No of Dwellings: | 44 | | |
| | Survey date: <i>TUESDAY</i> | <i>27/09/22</i> | | <i>Survey Type: MANUAL</i> |
| 19 | NF-03-A-50 | MIXED HOUSES | | NORFOLK |
| | BRANDON ROAD SWAFFHAM | | | |
| | Edge of Town Residential Zone | | | |
| | Total No of Dwellings: | 75 | | |
| | Survey date: <i>FRIDAY</i> | <i>14/10/16</i> | | <i>Survey Type: DIRECTIONAL ATC COUNT</i> |
| 20 | NT-03-A-08 | DETACHED HOUSES | | NOTTINGHAMSHIRE |
| | WIGHAY ROAD HUCKNALL | | | |
| | Edge of Town Residential Zone | | | |
| | Total No of Dwellings: | 36 | | |
| | Survey date: <i>MONDAY</i> | <i>18/10/21</i> | | <i>Survey Type: MANUAL</i> |
| 21 | NY-03-A-14 | DETACHED & BUNGALOWS | | NORTH YORKSHIRE |
| | PALACE ROAD RIPON | | | |
| | Edge of Town Residential Zone | | | |
| | Total No of Dwellings: | 45 | | |
| | Survey date: <i>WEDNESDAY</i> | <i>18/05/22</i> | | <i>Survey Type: MANUAL</i> |
| 22 | PB-03-A-04 | DETACHED HOUSES | | PETERBOROUGH |
| | EASTFIELD ROAD PETERBOROUGH | | | |
| | Suburban Area (PPS6 Out of Centre) Residential Zone | | | |
| | Total No of Dwellings: | 28 | | |
| | Survey date: <i>MONDAY</i> | <i>17/10/16</i> | | <i>Survey Type: MANUAL</i> |
| 23 | PS-03-A-02 | DETACHED/SEMI-DETACHED | | POWYS |
| | GUNROG ROAD WELSHPOOL | | | |
| | Suburban Area (PPS6 Out of Centre) Residential Zone | | | |
| | Total No of Dwellings: | 28 | | |
| | Survey date: <i>MONDAY</i> | <i>11/05/15</i> | | <i>Survey Type: MANUAL</i> |

LIST OF SITES relevant to selection parameters (Cont.)

| | | | | |
|-----------|--|--------------------------------|----------|----------------------|
| 24 | SC-03-A-04 HIGH ROAD BYFLEET | DETACHED & TERRACED | | SURREY |
| | Edge of Town Residential Zone Total No of Dwellings: | | 71 | |
| | Survey date: THURSDAY | | 23/01/14 | Survey Type: MANUAL |
| 25 | SC-03-A-07 FOLLY HILL FARNHAM | MIXED HOUSES | | SURREY |
| | Edge of Town Residential Zone Total No of Dwellings: | | 41 | |
| | Survey date: WEDNESDAY | | 11/05/22 | Survey Type: MANUAL |
| 26 | SD-03-A-01 HEADLANDS GROVE SWINDON | SEMI DETACHED | | SWINDON |
| | Suburban Area (PPS6 Out of Centre) Residential Zone Total No of Dwellings: | | 27 | |
| | Survey date: THURSDAY | | 22/09/16 | Survey Type: MANUAL |
| 27 | SF-03-A-07 FOXHALL ROAD IPSWICH | MIXED HOUSES | | SUFFOLK |
| | Suburban Area (PPS6 Out of Centre) Residential Zone Total No of Dwellings: | | 73 | |
| | Survey date: THURSDAY | | 09/05/19 | Survey Type: MANUAL |
| 28 | SM-03-A-01 WEMBDON ROAD BRIDGWATER NORTHFIELD | DETACHED & SEMI | | SOMERSET |
| | Edge of Town Residential Zone Total No of Dwellings: | | 33 | |
| | Survey date: THURSDAY | | 24/09/15 | Survey Type: MANUAL |
| 29 | ST-03-A-08 SILKMORE CRESCENT STAFFORD MEADOWCROFT PARK | DETACHED HOUSES | | STAFFORDSHIRE |
| | Edge of Town Residential Zone Total No of Dwellings: | | 26 | |
| | Survey date: WEDNESDAY | | 22/11/17 | Survey Type: MANUAL |
| 30 | TB-03-A-01 BRONSHILL ROAD TORQUAY | TERRACED HOUSES | | TORBAY |
| | Suburban Area (PPS6 Out of Centre) Residential Zone Total No of Dwellings: | | 37 | |
| | Survey date: WEDNESDAY | | 30/09/15 | Survey Type: MANUAL |
| 31 | WK-03-A-03 BRESE AVENUE WARWICK GUYS CLIFFE | DETACHED HOUSES | | WARWICKSHIRE |
| | Suburban Area (PPS6 Out of Centre) Residential Zone Total No of Dwellings: | | 23 | |
| | Survey date: WEDNESDAY | | 25/09/19 | Survey Type: MANUAL |

LIST OF SITES relevant to selection parameters (Cont.)

| | | | |
|-----------|---|------------------------|---------------------|
| 32 | WK-03-A-04 DALEHOUSE LANE KENILWORTH | DETACHED HOUSES | WARWICKSHIRE |
| | Edge of Town Residential Zone | | |
| | Total No of Dwellings: | 49 | |
| | Survey date: FRIDAY | 27/09/19 | Survey Type: MANUAL |
| 33 | WS-03-A-10 TODDINGTON LANE LITTLEHAMPTON WICK | MIXED HOUSES | WEST SUSSEX |
| | Edge of Town Residential Zone | | |
| | Total No of Dwellings: | 79 | |
| | Survey date: WEDNESDAY | 07/11/18 | Survey Type: MANUAL |

This section provides a list of all survey sites and days in the selected set. For each individual survey site, it displays a unique site reference code and site address, the selected trip rate calculation parameter and its value, the day of the week and date of each survey, and whether the survey was a manual classified count or an ATC count.

MANUALLY DESELECTED SITES

| Site Ref | Reason for Deselection |
|------------|--|
| AC-03-A-04 | Low Trip Rate (PM) |
| BO-03-A-01 | Undertaken during covid (low trip rates) |
| WO-03-A-07 | Undertaken during covid (low trip rates) |

MANUALLY DESELECTED SURVEYS

| Site Ref | Survey Date | Reason for Deselection |
|------------|-------------|------------------------|
| DH-03-A-01 | 28/03/17 | Low Trip Rates (AM) |

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

TOTAL VEHICLES**Calculation factor: 1 DWELLS****BOLD print indicates peak (busiest) period**

| Time Range | ARRIVALS | | | DEPARTURES | | | TOTALS | | |
|---------------|-----------|-------------|--------------|------------|-------------|--------------|-----------|-------------|--------------|
| | No. Days | Ave. DWELLS | Trip Rate | No. Days | Ave. DWELLS | Trip Rate | No. Days | Ave. DWELLS | Trip Rate |
| 00:00 - 01:00 | | | | | | | | | |
| 01:00 - 02:00 | | | | | | | | | |
| 02:00 - 03:00 | | | | | | | | | |
| 03:00 - 04:00 | | | | | | | | | |
| 04:00 - 05:00 | | | | | | | | | |
| 05:00 - 06:00 | | | | | | | | | |
| 06:00 - 07:00 | | | | | | | | | |
| 07:00 - 08:00 | 33 | 48 | 0.089 | 33 | 48 | 0.328 | 33 | 48 | 0.417 |
| 08:00 - 09:00 | 33 | 48 | 0.166 | 33 | 48 | 0.366 | 33 | 48 | 0.532 |
| 09:00 - 10:00 | 33 | 48 | 0.154 | 33 | 48 | 0.203 | 33 | 48 | 0.357 |
| 10:00 - 11:00 | 33 | 48 | 0.162 | 33 | 48 | 0.194 | 33 | 48 | 0.356 |
| 11:00 - 12:00 | 33 | 48 | 0.163 | 33 | 48 | 0.175 | 33 | 48 | 0.338 |
| 12:00 - 13:00 | 33 | 48 | 0.198 | 33 | 48 | 0.197 | 33 | 48 | 0.395 |
| 13:00 - 14:00 | 33 | 48 | 0.192 | 33 | 48 | 0.181 | 33 | 48 | 0.373 |
| 14:00 - 15:00 | 33 | 48 | 0.188 | 33 | 48 | 0.206 | 33 | 48 | 0.394 |
| 15:00 - 16:00 | 33 | 48 | 0.313 | 33 | 48 | 0.207 | 33 | 48 | 0.520 |
| 16:00 - 17:00 | 33 | 48 | 0.319 | 33 | 48 | 0.205 | 33 | 48 | 0.524 |
| 17:00 - 18:00 | 33 | 48 | 0.355 | 33 | 48 | 0.187 | 33 | 48 | 0.542 |
| 18:00 - 19:00 | 33 | 48 | 0.264 | 33 | 48 | 0.154 | 33 | 48 | 0.418 |
| 19:00 - 20:00 | | | | | | | | | |
| 20:00 - 21:00 | | | | | | | | | |
| 21:00 - 22:00 | | | | | | | | | |
| 22:00 - 23:00 | | | | | | | | | |
| 23:00 - 24:00 | | | | | | | | | |
| Total Rates: | | | 2.563 | | | 2.603 | | | 5.166 |

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: $COUNT/TRP*FACT$. Trip rates are then rounded to 3 decimal places.

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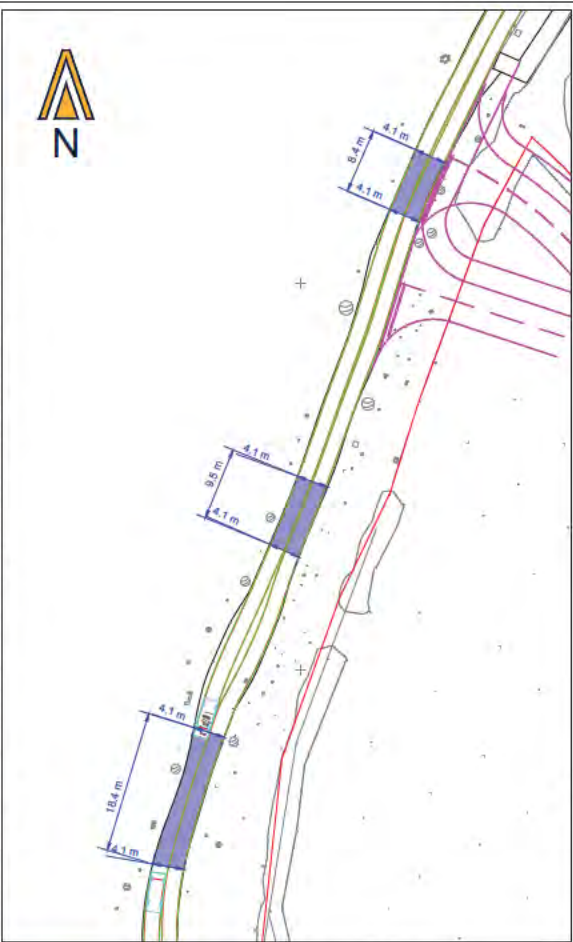
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Parameter summary

| | |
|---|---------------------|
| Trip rate parameter range selected: | 23 - 80 (units:) |
| Survey date range: | 01/01/14 - 14/10/22 |
| Number of weekdays (Monday-Friday): | 34 |
| Number of Saturdays: | 0 |
| Number of Sundays: | 0 |
| Surveys automatically removed from selection: | 5 |
| Surveys manually removed from selection: | 3 |

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

Appendix D – Passing Place Analysis



Inset scaled to
1:500 @ A3



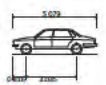
NOTES

- DO NOT SCALE FROM THIS DRAWING. WORK FROM FIGURED DIMENSIONS ONLY.
- EVOKE TRANSPORT PLANNING CONSULTANTS LIMITED ACCEPTS NO RESPONSIBILITY FOR THE ACCURACY OF THIRD PARTY INFORMATION - THIS MUST BE TREATED AS INDICATIVE ONLY.

KEY

- NARROW ROAD SECTIONS (UNDER 4.1m WIDTH)
- DIMENSIONS
- SITE WESTERN BOUNDARY
- PROPOSED ACCESS

VEHICLE PROFILE



| | |
|-----------------------------|--------|
| Large Car (2006) | 5.079m |
| Overall Length | 5.079m |
| Overall Width | 1.872m |
| Overall Body Height | 1.525m |
| Min Body Ground Clearance | 0.310m |
| Max Track Width | 1.831m |
| Lock to lock time | 4.00s |
| Kerb to Kerb Turning Radius | 5.900m |

| | | | | |
|-----|-----------------|----|-----|----------|
| - | Initial Drawing | TW | BW | 01.03.23 |
| Rev | Amendment | Dm | App | Date |

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| | | | | | | |
|------------|---------------|-------------|--------|-----------|----------|---|
| Drawn by | TW | Approved by | BW | Date | 01.03.23 | |
| Scale | 1:1000 @ A3 | | Job No | R-23-0010 | | |
| Drawing No | R-23-0010-005 | | | | Rev | - |

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| | |
|---------------|---|
| Project Name | LONG LANE TILEHURST |
| Client | DARCLIFFE HOMES |
| Drawing Title | LONG LANE ROAD WIDTH ASSESSMENT AND TRACKING |

APPENDIX 5 – TRANSPORT AND ACCESS APPRAISAL REPORT FOR SITE B



**LAND EAST OF SULHAM HILL
BETWEEN BAREFOOTS COPSE &
CORNWELL COPSE, SULHAM HILL,
TILEHURST**

TRANSPORT AND ACCESS APPRAISAL

01 March 2023



LAND EAST OF SULHAM HILL BETWEEN BAREFOOTS COPSE & CORNWELL COPSE, SULHAM HILL, TILEHURST

TRANSPORT AND ACCESS APPRAISAL

PROJECT DETAILS

| | |
|----------------------------|---|
| Project Name: | Land east of Sulham Hill between Barefoots Copse & Cornwell Copse, Sulham Hill, Tilehurst |
| Client: | Darcliffe Homes |
| Document Type: | Transport and Access Appraisal |
| Document Reference: | R-23-0010-02 |
| Date: | 01 March 2023 |

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APPROVAL

| Number: | Name: | Position: | Date: | Modifications: |
|---------|-----------|----------------|----------------------|----------------|
| 01 | Author: | Tim Wilcox | Assistant Consultant | 28/02/2023 |
| | Checked: | Beth Wilson | Principal Consultant | 28/02/2023 |
| | Approved: | David Fletcher | Associate Director | 01/03/2023 |

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| Appendix C – TRICS Outputs |

1. Introduction

- 1.1.1. Evoke Transport Planning Consultants Ltd (Evoke) has been commissioned by Darcliffe Homes to consider the feasibility of developing Land east of Sulham Hill between Barefoots Copse & Cornwell Copse, Sulham Hill, Tilehurst for future residential development. The local planning authority (LPA) and local highway authority (LHA) are West Berkshire Council (WBC).
- 1.1.2. The site lies to the east of Sulham Hill between Barefoot Copse and Cornwell Copse, bound to the north by Back Lane (designated as a Public Right of Way (PRoW)) and to the east by residential properties off Meadowside. The site is currently used for agricultural purposes.
- 1.1.3. The location of the site is outlined in Figure 1 below.

Figure 1 – Site Location



Background Image Source: Google Maps

1.2. Potential Future Development

- 1.2.1. This Transport and Highways Appraisal has been prepared to support the promotion of the site for residential development, to be considered through the updated West Berkshire Local Plan.
- 1.2.2. The precise design and composition of the potential development is yet to be confirmed and would be subject to any forthcoming planning application. However, at this stage, the site is considered suitable to accommodate around 49 residential units, including new vehicle, pedestrian and cycle access points.

1.3. Report Structure

- 1.3.1. This report has been prepared to consider the following:

- The accessibility of the site for all potential site users by all modes of transport;
- To ascertain if safe and suitable access can be achieved for all modes of transport;
- To identify any potential future transport and highway related impacts; and
- To consider the potential mitigation and/or improvement options which may be considered suitable to come forward through any potential allocation and/or future planning application at the site.

1.3.2. The above has been considered in accordance with national and local planning policy requirements including the NPPF and PPG and the currently adopted planning policy, national and local design guidance, and consideration of potential future policy and guidance requirements which may come forward either through the ongoing Local Plan process and/or through other emerging documentation.

1.3.3. It is important to note that, should development at this site come forward, a Transport Statement, Travel Plan and other relevant documentation would be produced to fully evaluate the transport and highway impacts associated with the precise development, which would include detailed discussions with the LHA. Notwithstanding this, the findings of this Transport and Highways Appraisal enable an understanding of the key considerations at this stage and demonstrate the development potential.

1.3.4. Following this introductory section, the remainder of the report is structured as follows:

- **Section 2: Policy and Design Compliance** – Provides a summary of the current and emerging national and local planning policy and design guidance relevant to this potential allocation;
- **Section 3: Existing Situation** – Describes the existing transport and highways conditions at the site and within the surrounding area;
- **Section 4: Potential Development Strategy** – Provides discussion of the proposed site allocation in respect of access, sustainable movement strategy, trip generation and potential development impact;
- **Section 5: Summary** – Outlines the findings of this Transport and Highways Appraisal and summarises the proposed site allocation in transport and highways terms.

2. Policy and Design Guidance

2.1. Introduction

2.1.1. This chapter reviews current and emerging transport planning policies and guidance at national and local levels and summarises how the potential site allocation should comply.

2.2. National Policy and Guidance

National Planning Policy Framework

2.2.1. In July 2021, the revised National Planning Policy Framework (NPPF) was published, setting out a number of transport objectives designed to facilitate sustainable development and contribute to a wider sustainability by giving people a wider choice about how they travel.

2.2.2. Paragraph 106 states that planning policies should:

- Support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities;
- Be prepared with the active involvement of local highways authorities, other transport infrastructure providers and operators and neighbouring councils, so that strategies and investments for supporting sustainable transport and development patterns are aligned;
- Identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development;
- Provide for attractive and well-designed walking and cycling networks with supporting facilities such as secure cycle parking (drawing on Local Cycling and Walking Infrastructure Plans);
- Provide for any large-scale transport facilities that need to be located in the area, and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy. In doing so they should take into account whether such development is likely to be a nationally significant infrastructure project and any relevant national policy statements.

2.2.3. In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that (paragraph 110):

- Appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;
- Safe and suitable access to the site can be achieved for all users;
- The design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and
- Any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.

2.2.4. At paragraph 111 the NPPF states that development should only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. Within this context, applications for development should:

- Give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;

- Address the needs for people with disabilities and reduced mobility in relation to all modes of transport;
- Create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;
- Allow for the efficient delivery of goods, and access by service and emergency vehicles; and Be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

National Design Guide (October 2019)

2.2.5. The National Design Guide was published in October 2019 and sets out the characteristics of well-designed places and demonstrates what good design means in practice. Paragraph 62 states that well-designed places are walkable with safe, recognisable and legible streets, are accessible by public transport and provide access to services and facilities. Paragraph 76 states that a well-designed movement network;

- is safe and accessible for all;
- functions efficiently to get everyone around, takes account of the diverse needs of all its potential users and provides a genuine choice of sustainable transport modes;
- limits the impacts of car use by prioritising and encouraging walking, cycling and public transport, mitigating impacts and identifying opportunities to improve air quality;
- promotes activity and social interaction, contributing to health, well-being, accessibility and inclusion; and
- incorporates green infrastructure, including street trees to soften the impact of car parking, help improve air quality and contribute to biodiversity.

2.2.6. Paragraph 77 states that priority in developments should be to pedestrian and cycle movements and developments should create routes that are safe, direct, convenient and accessible for people of all abilities (Paragraph 78).

Manual for Streets (MfS 2007) and Manual for Streets 2 (MfS2 2010)

2.2.7. These documents provide guidance for planning and designing new residential streets. They aim to increase the quality of life through good design which creates more people-orientated streets. The key recommendation of MfS / MfS2 is that increased consideration should be given to the 'place' function of streets. This function is essentially what distinguishes a street from a road, where the main purpose is to facilitate movement.

2.2.8. The underlying theme when designing street networks (as opposed to designing individual streets) is catering for movement. Walkable neighbourhoods are typically characterised by having a range of facilities available to residents that can be accessed comfortably on foot. Making the local environment convenient and attractive to walk in can help enhance the vibrancy of a community and reduce reliance on motor transport.

2.2.9. Another key theme within MfS/MfS2 is providing sufficient visibility at access junctions. The visibility splay at a junction ensures that there is adequate inter-visibility between vehicles on the major and minor arms. The visibility requirements are outlined in Table 7.1 of MfS which has been reproduced in Table 1.

Table 1 – MfS Stopping Sight Distances

| Derived SSDs for streets | | | | | | | | | | | | |
|--|---------------------------|----|----|----|----|----|----|----|----|----|----|----|
| Speed | Kilometres per hour (Kph) | 16 | 20 | 24 | 25 | 30 | 32 | 40 | 45 | 48 | 50 | 60 |
| | Miles per hour (Mph) | 10 | 12 | 15 | 16 | 19 | 20 | 25 | 28 | 30 | 31 | 37 |
| Stopping Sight Distance (SSD) | | 9 | 12 | 15 | 16 | 20 | 22 | 31 | 36 | 40 | 43 | 56 |
| SSD adjusted for bonnet length | | 11 | 14 | 17 | 18 | 23 | 25 | 33 | 39 | 43 | 45 | 59 |
| Additional features will be needed to achieve low speeds | | | | | | | | | | | | |

- 2.2.10. MfS explicitly states that the document “comprises technical guidance and does not set out any new policy or legal requirements”. As such MfS provides a best practice guide for designing new junctions/improving existing junctions.
- 2.2.11. It is noted that a third edition of MfS is currently being prepared. Whilst, at the time of writing this document is not yet published, any future development opportunity at the site will consider any new or revised requirements when considering the design of the site layout.

2.3. Local Planning Policy and Guidance

Current West Berkshire Local Plan

- 2.3.1. WBC’s current Local Plan includes the Core Strategy Development Plan Document (DPD), the Housing Site Allocations Development Plan Document and a number of Supplementary Planning Documents (SPDs) and Saved Policies. The current plan was adopted in 2012 and covers up to 2026.
- 2.3.2. Core Policy CS13: Transport states that residential development should seek to demonstrate good accessibility by:
 - Locating where there is already good access to key services and facilities;
 - Contributing towards improving connections between communities and key services and facilities.

West Berkshire Local Plan Review

- 2.3.3. WBC is currently undertaking a review of their Local Plan to cover the period to 2039. The Regulation 19 consultation on the Local Plan Review proposed submission document is currently being undertaken.

Previous WBC Site Assessment

- 2.3.4. The site was originally assessed within the 2013 Strategic Housing Lane Availability Assessment (site ref EUA032) as ‘potentially developable’ and was subsequently reviewed as part of the site selection process for the Housing Site Allocations Development Plan Document.
- 2.3.5. To support the site’s potential allocation, a Transport Statement was prepared by Glanville Consultants and submitted to WBC in August 2014.
- 2.3.6. At this time, the Site Allocations DPD stated that the site is ‘close to a number of services and employment opportunities as well as public transport options linking to Reading’.
- 2.3.7. Through the Housing and Economic Land Availability Assessment (HELAA, Appendix 4, Site Assessments) which forms part of the Reg 19, the site (ref TIL15) the site was ultimately not taken forward to a formal allocation. In terms of transport and highways, the following comments were made:

Access:

This site was considered previously with the Housing Site Allocations Development Plan Document. An adoptable access can be obtained with the required sight lines . However the site was resisted due to



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concerns that Long Lane is narrow and windy fronting the site. There is also concern regarding sight lines at the Long Lane / Sulham Hill junction and Sulham Hill in general. Highways continue to not support this site.

Local Highway Capacity:

The Council's Highways Team are concerned regarding additional traffic levels on the narrow and windy Long Lane fronting the site. Highways do not support this site.

Strategic Road Network:

National Highways have advised that individually the site would unlikely materially impact the operation of the strategic road network.

Summary

- 2.3.8. Should the site developed, any planning application would be subject to a full review of any current and/or emerging policy and design guidance, to ensure that a future development strategy comes forward in accordance with both national and local requirements.
- 2.3.9. Notwithstanding this, this Transport and Access Appraisal considers the potential development potential in relation to current policy and design guidance; and also seeks to respond to the previous assessment of this site through the various optioneering assessments completed by WBC through development of their current and updated Local Plan.
- 2.3.10. At the forefront of any planning application will be the development and implementation of a transport hierarchy, which seeks to ensure that any future development prioritises a reduced need to travel, followed by supporting trips by walking, cycling and public transport whilst flexibly responding to advances in technology. Finally, the impact of any residual vehicle movements will be suitably accommodated, with mitigation where required in accordance with the NPPF.
- 2.3.11. The transport hierarchy for this site is summarised in Figure 2.

Figure 2 – Transport Hierarchy

Reduce the need to travel including designing for flexible working and work from home, encouraging virtual mobility and online shopping and other measures to reduce the instance of large vehicles such as delivery vehicles



Suitable Access to Public Transport; by bus (including nearby local bus stops along Dark Lane and Chapel Hill) and by rail, with access primarily by cycle or bus to Tilehurst Rail Station



Finally, **mitigate against the impact of** vehicle movements impact where required, ensuring that there would be no unacceptable impact on highway safety, or severe residual impact on the surrounding road network in accordance with the NPPF.



Prioritise **trips by walking & cycling** for all, including the visually and/or mobility impaired, the young and elderly, within the site and through providing improved connections to existing routes.



Flexibly respond to advances in technology including electric car and cycle charging, flexible road space and other existing and emerging policy and design guidance.

3. Existing Site Conditions

3.1. Context

3.1.1. This section outlines the baseline transport conditions at the site and in the surrounding area, considering the existing walking, cycling, public transport and road network and the facilities and amenities available.

3.2. Site Location and Existing Use

3.2.1. The site is located within the Tilehurst area of Reading. Tilehurst is a large residential suburb, supported by a wide range of shops, services and other amenities, with fast and direct bus links to and from Reading Town Centre, and a rail station which is on the Great Western Main Line, providing stopping services between Oxford and Reading. The site in its local context is demonstrated in Figure 3.

Figure 3 – Local Area Around the Site, Detailing Viewpoints and Footways



Base Map Source: Google Maps

3.2.2. The site itself is located on the western edge of Tilehurst, bordered to the north by the Back Lane public right of way (PRoW), to the east by residential properties off Meadowside, to the south by an area of woodland and to the west by Sulham Hill. The site is currently used for agricultural purposes.

3.2.3. There are currently two field gate access points to the site both of which are accessed from Sulham Hill. These are shown in Figure 4, with locations marked on the map in Figure 3.

Figure 4 – Vehicular Access Points



3.3. Walking and Cycling Network

- 3.3.1. To enable an assessment of the viability of walking and cycling between the site and key destinations in the local area it is appropriate to establish the maximum distance that people are generally prepared to walk and/or cycle and the destinations that exist within these distances.
- 3.3.2. The Chartered Institute for Highways and Transport (CIHT) guidance, 'Planning for Walking' (2015) states that 'walkable neighbourhoods are typically characterised as having a range of facilities within 10 minutes' walking distance (around 800m). It states that for bus stops in residential areas, 400m has traditionally been regarded as a cut off point, and that people will walk up to 800m to a rail station.
- 3.3.3. The guidance also notes that *'the propensity to walk or cycle is not only influenced by distance but also the quality of the experience; people may be willing to walk or cycle further where their surroundings are more attractive, safe and stimulating.'*
- 3.3.4. Additionally, Manual for Streets states that *'walkable neighbourhoods are typically characterised by having a range of facilities within 10 minutes' (up to about 800m) walking distance of residential areas which residents may access comfortably on foot. However, this is not an upper limit and PPG13 states that walking offers the greatest potential to replace short car trips, particularly those under 2km.'*
- 3.3.5. Cycling is considered an important mode of sustainable travel, and five miles (c.8km) is generally considered an 'achievable' cycle distance for most people (source: LTN 1\20, Cycle Infrastructure design).
- 3.3.6. The foot and cycle network in the vicinity of the site is extensive and includes a network of footways, Public Right of Ways (PRoWs) and shared foot/cycle paths, with some of the more established routes tarmacked and the more rural routes left as a natural path. Examples of typical footpath profiles are shown in Figure 5.

Figure 5 – Typical Images of Local Pathways



Surfaced path, Location C (Fig.3)

Unsurfaced path, Location D (Fig.3)

Surfaced path, Location E (Fig.3)

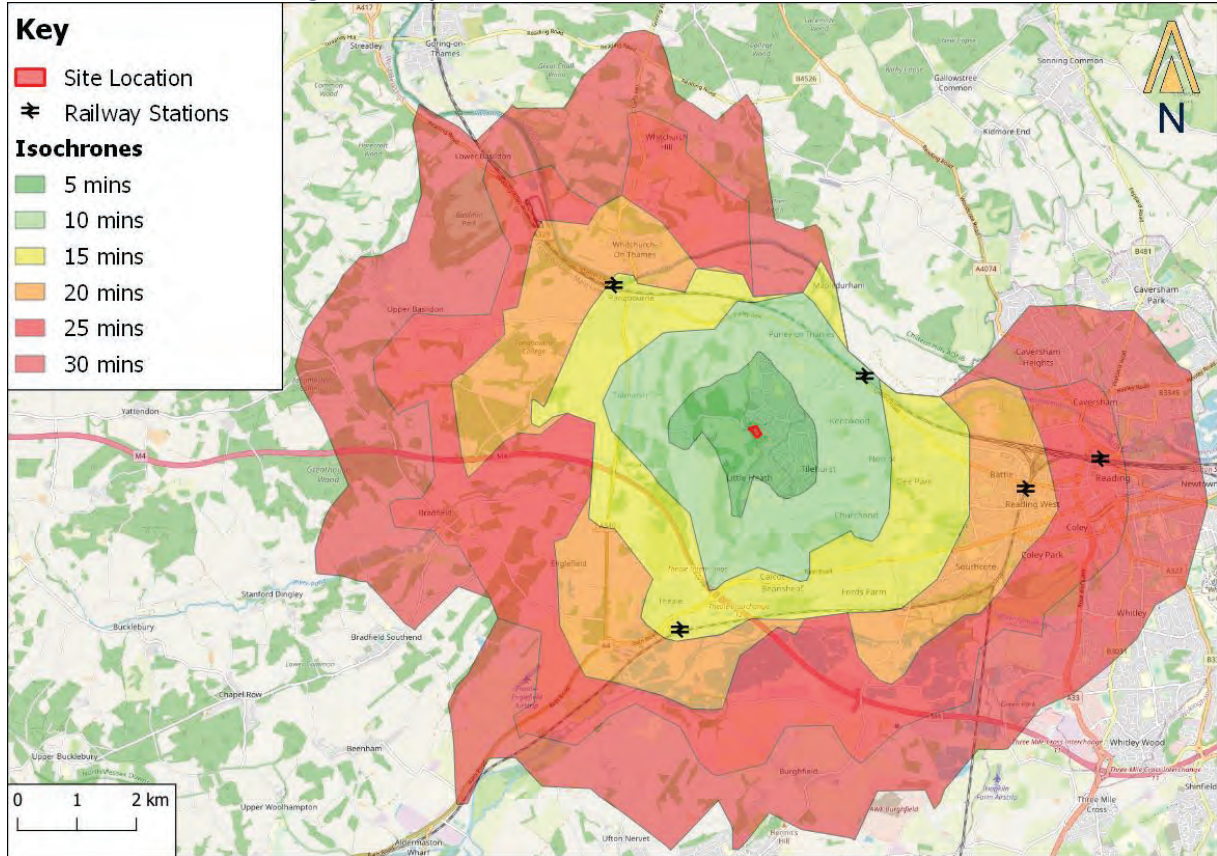
Unsurfaced path, Location F (Fig.3)

- 3.3.7. The network of footways and PRoWs link the site directly to the surrounding built up area of Tilehurst, including its local facilities and amenities. Back Lane, running along the site’s north western boundary, is designated as a Bridleway (ref 17/1) which provides a pedestrian and cycle link directly from the site to the bus stops on Dark Lane. It is noted that the route along the eastern site boundary (detailed in Figure 2, Location D and Location F) is included within WBC’s Interactive Online Map as being included within WBC’s PRoW Improvement Plan.
- 3.3.8. WBC’s interactive Online Map demonstrates that the ‘Round Berkshire Cycle Route’ follows an almost circular route around the entire district, linking with towns and villages across West Berkshire and continuing into Reading, through Tilehurst. The route continues close to the site, Sulham Hill before turning into Long Lane, c.200m to the west of the site and Dark Lane, c.340m to the north of the site, before it joins with the formal ‘North West Reading Cycle Route’ which runs between Denefield School and Tilehurst Station, continuing into Reading Town Centre.

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- 3.3.9. Figure 6 shows cycle isochrones which demonstrate the areas that can be reached within a 30-minute cycle of the site (at 5-minute intervals). The isochrones are generated based on speeds dependent on the surface and highway type. The majority of the routes used would be paved and as such would be subject to an c.18kph cycle speed based on the parameters in the software. A five-minute isochrone would therefore cover a distance of c. 1.5km, with a 30 minute isochrone covering a distance of 9km.

Figure 6 – Cycle Isochrones from Site Location



Source: QGIS, OpenStreetMap, and OpenRouteService (assuming 18 kph cycle speed)

- 3.3.10. The isochrone demonstrates that five railway stations are accessible by bike within 25 minutes of the site, including Tilehurst station which is a less than ten minute cycle journey. Additionally, all of Reading town centre is within the maximum acceptable cycling distance, as well as Theale and Pangbourne.

3.4. Public Transport Accessibility

Bus Services

- 3.4.1. The site benefits from direct access to bus stops on Dark Lane via foot or cycle via PRoW 17/1, located c.350m to the north of the site (a four-minute walk). The Fairford Road Bus Stop on Dark Lane provides access to the 16 Route, whilst approximately 450m south of the site (a five minute walk) is Hallplace Farm Bus Stop, which provides access to the 33 Route. The details of the bus services are shown in Table 2.

Table 2 – Local Bus Routes

| No. | Destination | Weekday Frequency | | | Weekend Frequency | |
|-----|---------------------|-------------------|-----------|----------|-------------------|------------|
| | | Frequency | First Bus | Last Bus | Saturday | Sunday |
| 16 | Reading Town Centre | 20 minutes | 05:59 | 23:59 | 20 minutes | 30 minutes |
| 16 | Purley on Thames | 20 minutes | 05:37 | 23:40 | 20 minutes | 30 minutes |
| 33 | Reading Town Centre | 20 minutes | 05:11 | 23:48 | 30 minutes | 30 minutes |

N.B. Route 33 operates in a circular route for this section of the route, and as such only provides one destination. Additionally, three other bus routes do 'run' from Hallplace Farm, but these are school buses which operate once in the AM and once in the PM.

National Rail

- 3.4.2. The nearest train station is Tilehurst Railway Station, a 2.3km journey away (a 27-minute walk or an eight-minute cycle). This station provides half-hourly services between London Paddington via Reading (Reading – 7 minutes, London – one hour) and Didcot Parkway (a 23-minute journey). The details of these services are shown in Table 3.

Table 3 – Train Routes from Tilehurst Railway Station

| Destination | Weekday Frequency | | | Weekend Frequency | |
|-------------------------------|-------------------|-------------|------------|-------------------|------------|
| | Frequency | First Train | Last Train | Saturday | Sunday |
| London Paddington via Reading | 30 minutes | 04:32 | 01:22 | 30 minutes | 1 per hour |
| Didcot Parkway | 30 minutes | 05:55 | 00:30 | 30 minutes | 1 per hour |

- 3.4.3. Tilehurst Station has access to 10 cycle parking spaces in the form of a secure cycle store, in addition to a 114-space car park with the provision of two disabled parking bays.
- 3.4.4. As well as access via foot or cycle, the station is also accessible by bus; with a journey time of just four minutes.
- 3.4.5. Both of these public transport routes provide a viable alternative mode of travel for commuting, with services covering commuting times and providing access to Reading, Maidenhead, and Slough in under 40 minutes (assuming the user cycles to the train station).

3.5. Accessibility to Local Services

- 3.5.1. Figure 7 considers the site in its wider local context, including local facilities and amenities, and summarising the above walking, cycling and public transport accessibility to and from these.

Figure 7 – Summary of Accessibility Context



Source: Map Data from Google Maps

3.5.2. It is therefore demonstrated that the site is well located, within the suburb of Tilehurst and with direct access to Reading Town Centre via bus or train, and with a network of footways, cycleways and PROWs which provide both formal route options and leisure routes to surrounding schools, employment, shops and services.

3.6. Census Data

3.6.1. An analysis of the Census data has been undertaken to investigate the journey to work modal split for the existing resident population. The site is located within the West Berkshire 005 Middle Super Output Area (MSOA) and the data using the origin/destination 2011 data, and the recently released 2021 data (not yet available as origin/destination) is contained within Table 4.

Table 4 – Census 2011 and 2021 Journey to Work Data (West Berkshire 005 MSOA)

| Mode | 2011 Data | 2021 Data |
|---------------------|---------------|---------------|
| Train / Underground | 4.7% | 2.0% |
| Bus | 9.9% | 4.4% |
| Taxi | 0.0% | 0.1% |
| Motorcycle | 0.5% | 0.4% |
| Car Driver | 70.9% | 76.4% |
| Car Passenger | 5.6% | 6.1% |
| Bicycle | 2.4% | 1.8% |
| On foot | 5.8% | 7.7% |
| Other | 0.2% | 1.0% |
| Total | 100.0% | 100.0% |

3.6.2. Table 4 shows that, of those travelling from the West Berkshire 005 MSOA to work, the 2011 data shows approximately 71% of journeys are made by car, with a further 5.6% made by car passenger. The 2021

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data shows a higher percentage of car driver, at 76.4% with 6.1% of journeys to work made by car passenger.

- 3.6.3. It is worth noting that the 2021 data was undertaken during the COVID-19 pandemic, in the midst of a national lockdown. As such, the data is unlikely to represent residents 'usual' mode of travel. For example, a review of the Census 2021 data indicates a large proportion (around 38.4% of total respondents) in this MSOA working at or mainly from home. Whilst this data has been discounted from the results presented in Table 4, it is important to recognise that working habits have seen a significant shift in the last few years, primarily as a result of the COVID-19 pandemic, with a significant proportion of the working population now working from home at least some of the working week. A further review of the LC7701EW dataset (Method of Travel to Work, 2001 specification, by distance travelled to work) indicates that, in 2011, approximately 11% of residents within this MSOA stated that they worked mainly at or from home; thus whilst some people have now returned to pre-pandemic habits, a number have maintained their working from home practices and as such the level of increase is likely to impact the number of trips generated by a residential development such as this, particularly during the traditional network peak hours.
- 3.6.4. Similarly, there have been significant short and medium term shifts away from public transport. Some are likely to be a result of shorter term concerns over social distancing, but others simply a result of residents travelling less frequently to their workplace and thus using other modes. Public transport operators are responding to these shifts to encourage uptake, for example flexible ticketing options, however these were not in place at the time of the 2021 census. It is therefore recognised that both sets of Census data need to be treated with caution and used as an indication of potential travel mode only.
- 3.6.5. For the purpose of establishing potential mode share for future residents travelling to work from the site, the 2011 Census data is considered the most robust dataset, as it takes account of 'typical', historic mode share, uninfluenced by factors surrounding the lockdown. Any available Census data, along with any other emerging data which may influence travel habits, would be reviewed through any future planning application at the site.

3.7. Local Road Network

Sulham Hill

- 3.7.1. The site fronts onto Sulham Hill; a single-carriageway road subject to the national speed limit in the vicinity of the site and varies in width between approximately 5.0 and 5.7m along the site frontage. Sulham Hill joins Chapel Hill approximately 320m south of the site. The conditions along Sulham Hill are demonstrated in Figure 8.

Figure 8 – Sulham Hill Site Frontage



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- 3.7.2. An Automated Traffic Counter (ATC) was placed along Sulham Hill between 24th January 2023 and 30th January 2023 by an independent traffic survey company to ascertain existing traffic volumes and speeds in the vicinity of the site. The location of the ATC placement is shown in Figure 9.

Figure 9 – Sulham Hill ATC Location



- 3.7.3. The ATC recorded a two-way, weekday peak hour of 08:00-09:00 in the morning (AM) period, and 16:00-17:00 in the afternoon (PM) period. A summary of the two-way traffic flows and speeds are presented in Table 5 (total vehicles and recorded speed) with the full data attached at Appendix A.

Table 5 – Sulham Hill ATC Summary

| | Eastbound | | | Westbound | | | Two-Way | | |
|------------------------------------|-----------|-----|-------|-----------|-----|-------|---------|-----|-------|
| | AM | PM | Daily | AM | PM | Daily | AM | PM | Daily |
| Tuesday (24 th) | 133 | 163 | 1207 | 205 | 108 | 1290 | 338 | 271 | 2,497 |
| Wednesday (25 th) | 128 | 163 | 1301 | 214 | 104 | 1342 | 342 | 267 | 2,643 |
| Thursday (26 th) | 152 | 158 | 1387 | 219 | 95 | 1443 | 371 | 253 | 2,830 |
| Friday (27 th) | 154 | 175 | 1388 | 183 | 116 | 1467 | 337 | 291 | 2,855 |
| Saturday (28 th) | 52 | 81 | 946 | 79 | 55 | 1009 | 131 | 136 | 1,955 |
| Sunday (29 th) | 25 | 82 | 884 | 57 | 54 | 897 | 82 | 136 | 1,781 |
| Monday (30 th) | 123 | 143 | 1306 | 214 | 119 | 1434 | 337 | 262 | 2,740 |
| Weekday Average | 138 | 160 | 1318 | 207 | 108 | 1395 | 345 | 269 | 2,713 |
| Day Average | 110 | 138 | 1203 | 167 | 93 | 1269 | 277 | 231 | 2,472 |
| 85 th Percentile Speeds | 31.3 | | | 31.3 | | | 31.3 | | |
| Average Mean Speed | 27.7 | | | 27.5 | | | 27.6 | | |

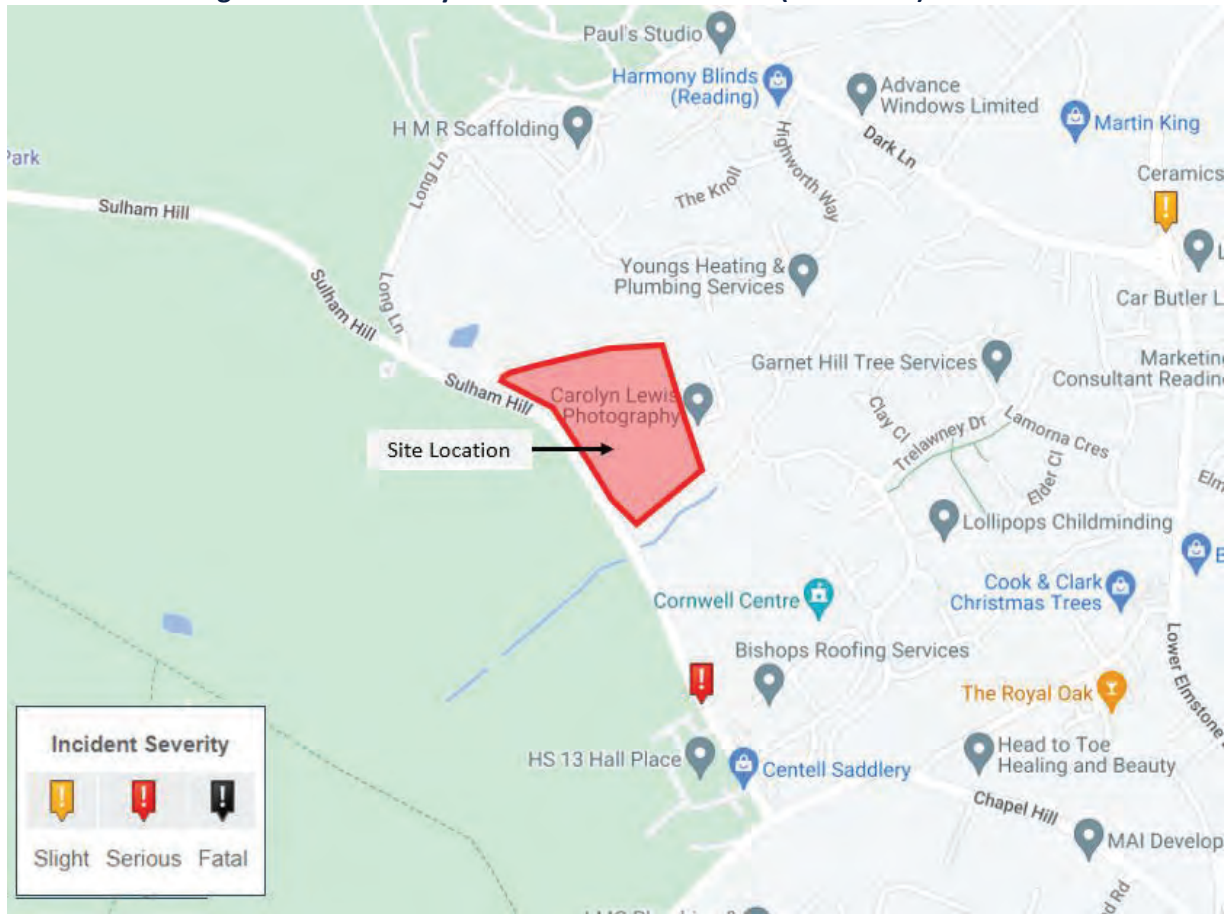
- 3.7.4. The five-day (weekday) average flows were recorded at 345 two-way movements during the AM Peak (recorded as 08:00-09:00) and 269 two-way movements during the PM Peak (recorded as 16:00-17:00) with 2,713 two-way movements recorded across the daily (24-hour) period.

- 3.7.5. With regards to vehicle speeds, an 85th percentile of 31.3mph was recorded, which is significantly below the national speed limit (60mph).

3.8. Highway Safety

- 3.8.1. A review of the online vehicle collision database at www.crashmap.com has been undertaken to establish the nature of any recorded Personal Injury Accident (PIA) incidents in the vicinity of the site over the latest available five-year period (2017-2021). The data is demonstrated in Figure 10.

Figure 10 – Summary of Recorded PIA Incidents (2017-2021)



Source: crashmap.com

- 3.8.2. One recorded incident has occurred along Sulham Hill in the study area over the latest available five-year period; in April 2021. This incident involved a cyclist and was recorded as ‘serious’ in nature. The incident occurred approximately 200m to the south of the southern-most point of the site. The cause of the incident is unknown, and news reports of the incident do not suggest the involvement of any other vehicles.
- 3.8.3. Whilst any incident is regrettable, an incidence rate of one over the last five-year period, along a stretch of over 500m in length, is not considered to represent a trend in statistics.
- 3.8.4. Any future planning application would include a full review of up-to-date accident data at the time of application, using the full recorded data available from West Berkshire Council. Any site access would be designed in accordance with all required standards, including appropriate visibility splays to ensure that development of the site will not result in any highway safety concerns, in accordance with the NPPF. Additionally, it is likely that all pedestrian and cycle movements would be routed to the north and east of the site, onto the dedicated car-free foot and cycle network, reducing the need for cyclists to travel along Sulham Hill.

3.9. Summary

- This section has considered the site’s accessibility by all modes of transport, including by foot and cycle as a priority, by public transport, and also by vehicle modes. This assessment has been used to consider the opportunities which this site presents to support and further enhance the accessibility of the surrounding area alongside any potential allocation.

- In terms of accessibility, the site is well located in relation to the existing built up suburb of Tilehurst, including bus stops, schools, employment opportunities and other local shops and services. The residential nature of the site would integrate well with the existing nature of the surrounding area.
- The five-day (weekday) average flows were recorded at 345 two-way movements during the AM Peak (recorded as 08:00-09:00) and 269 two-way movements during the PM Peak (recorded as 16:00-17:00) with 2,713 two-way movements recorded across the daily (24-hour) period. Whilst vehicle speeds are below the 60mph national speed limit with an 85th percentile of 31.3mph recorded;
- Additionally, the existing foot and cycle network, including the Back Lane Bridleway along the northern site boundary, presents a significant opportunity to link the site via a traffic free route to the surrounding area, which directly links to bus stops on Dark Lane.
- A review of Census data indicates that, in 2011, approximately 71% of journeys to work were made by private car, with approximately 23% made by sustainable modes, which includes almost 10% by bus. Comparing this to the 2021 data which has been recently released sees a shift away from bus and towards on-foot travel, however there is also a clear shift towards working from home; with an increase of over 30% between the two censuses. Whilst the 2011 data continues to provide a more stable dataset at the time of writing, emerging trends in travel habits will need to be taken into account through any future application at the site.
- A review of PIA incidents indicates that one incident occurred along this section of Sulham Hill across a five-year period, though at c.200m away from the site, is not considered to represent a trend in data; particularly when taking account of the potential benefits of the site which would include foot and cycle links which route these users away from Sulham Hill.
- Considering the analysis provided within this section, it is considered that the site location is suitable to accommodate this level of residential development.

4. Potential Development Strategy

4.1. Context

- 4.1.1. This section outlines the potential development strategy including potential access location(s) for all modes and provides details of how the site is likely to operate in transport and highway terms.

4.2. Indicative Masterplan

- 4.2.1. The precise design and composition of the potential future development has yet to be confirmed and will be subject to any forthcoming planning application. However, the site is considered suitable to accommodate a residential development of around 49 dwellings vehicle access from Sulham Hill and additional pedestrian/cycle links to join with the existing network to the north and east.

4.3. Transport Hierarchy

- 4.3.1. The preliminary masterplan, including access and off-site highway considerations have been prepared with the transport hierarchy at the forefront in accordance with local and national policy; placing priority first on a reduced need to travel and travel by pedestrians, cyclists and public transport.
- 4.3.2. This section demonstrates that suitable access to the site can be achieved for all potential future site users and shows that allocation of the site would enable supporting off-site improvements which would provide walking and cycling links to the surrounding area.

4.4. Potential Development Site Access Strategy

- 4.4.1. This section considers the various potential access options which could be delivered if the site were to be allocated.
- 4.4.2. It is noted that previous concerns have been raised in relation to providing safe and suitable access to the site. This section seeks to address and respond to these, ultimately demonstrating that access to the site for all users can be suitably achieved, with each access option providing enhancement opportunities to the pedestrian, cycle and wider Public Right of Way network. Should the site be allocated, each access option would be further considered in co-ordination with WBC.

Vehicular Site Access Arrangements

- 4.4.3. The site fronts onto the public highway at Sulham Hill to the west. Two points of access are currently available as previously described in Section 3.2; to the north western corner and to the south western corner. Both access points are field gate accesses and are relatively informal in nature.
- 4.4.4. Considering both the anticipated level of development (approximately 49 dwellings) and the existing, recorded traffic flows along Sulham Hill (2,713 two-way, 5-day average daily movements) a simple priority junction is considered most suitable to serve any future development at the site, which is in accordance with DMRB CD123: Geometric Design of At-Grade and Signal Controlled Junctions (Version 2.1.0).
- 4.4.5. For the purpose of this initial stage, two potential access options have been developed and are contained within **Appendix B** (drawing number R-23-0010-003 and drawing number R-23-0010-004).
- 4.4.6. Drawing number R-23-0010-003 shows an access which is located to the north west corner of the site, in the same location as the existing field gate. Drawing number R-23-0010-004 shows an access located to the south west corner of the site, just beyond the existing field gate (which would be stopped up alongside any future development). Either access could be suitably provided in accordance with both Manual for Streets and WBC Local Guidance.

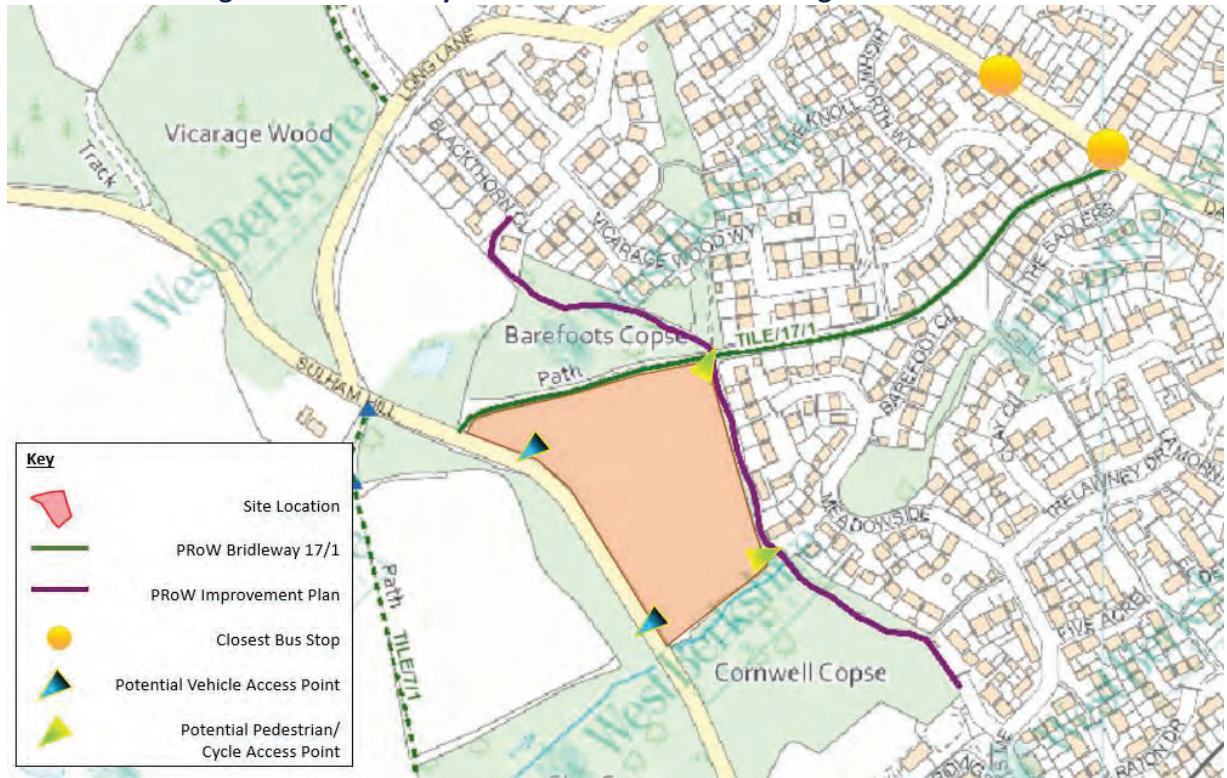
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- 4.4.7. Both access options demonstrate carriageway widths of 5.5m with 8.0m radii to accommodate the two-way movement of large cars, as well as for a large refuse vehicle entering and exiting the site in forward gear.
- 4.4.8. To inform the site access arrangements and associated visibility requirements, a 7-day Automatic Traffic Count (ATC) survey was undertaken along Sulham Hill, as previously described in Section X. The surveys demonstrate 85th percentile speeds of just 31.3mph; significantly below the national speed limit.
- 4.4.9. In accordance with recorded 85th percentile speeds, visibility splays have been demonstrated at 2.4m x 45m, which show that suitable visibility can be achieved in both directions in accordance with Manual for Streets requirements.
- 4.4.10. Additionally, it is noted that whilst recorded speeds have been demonstrated at just 31.3mph and therefore are within the 37mph threshold for demonstrating visibility using Manual for Streets calculations (as also noted on the WBC website 'Assessing the Impact of Planning Applications on Highways and Transport Infrastructure') it is recognised that the speed limit of the road is 60mph and thus DMRB calculations have also been considered when assessing achievable visibility, using a 4.5m x-distance and a 72m y-distance, which is in accordance with DMRB requirements.
- 4.4.11. Overall therefore, it is demonstrated that safe and suitable vehicle access to the site could be achieved for this level of residential development, in accordance with both local and national planning policy and design guidance.
- 4.4.12. Should the site be allocated for residential development and a planning application be submitted, the vehicle site access arrangements would be refined and discussed with WBC.

Pedestrian and Cycle Access

- 4.4.13. In addition to vehicle access onto Sulham Hill, the site location adjacent to the existing built up suburb of Tilehurst presents the opportunity to enhance accessibility for pedestrians and cyclists through links to the Back Lane Public Right of Way, which is designated as a bridleway and thus is available for use by both pedestrians and cyclists. From here, direct access is available to the bus stops on Dark Lane.
- 4.4.14. Additionally, links could be made to the footpath to the direct east of the site, which routes north/south between Blackthorn Close and Home Croft, which in turn provides access to the bus stops on Chapel Hill.
- 4.4.15. It may be that improvements are required to the existing Public Right of Way network, and it is anticipated that these would be discussed with WBC and their Public Right of Way team at the time of any planning application, taking account of any updated PRow Improvement Plan (which is currently being updated and is due for release in 2023).
- 4.4.16. A summary of the potential access arrangements for vehicles, pedestrians and cyclists is included as Figure 11.

Figure 11 – Summary of Potential Site Access Arrangements



Background Image Source: WBC Online Map

4.5. Internal Layout

- 4.5.1. The internal layout would be designed in accordance with both Manual for Streets requirements, and with full consideration of local planning policy, including WBC’s Car Parking requirements which are contained within WBC’s Housing Site Allocations Development Plan Document (DPD), adopted May 2017, which forms part of the current Local Plan. Specific advice on cycle parking is contained within WBC’s Cycle and Motorcycle Advice and Standards for New Development (November 2014).
- 4.5.2. The masterplan would include for the provision of electric vehicle and cycle charging, to ensure that take-up of electric modes is encouraged in accordance with the Government’s climate agenda.
- 4.5.3. The masterplan would ensure that a turning head is provided to ensure that all delivery and servicing vehicle could access and egress the site off Long Lane in forward gear.

4.6. Trip Generation & Development Impact

- 4.6.1. Provisional trip rates have been obtained from the TRICS database (Version 7.9.4) to determine the potential trip generation of this type of residential development in this location. The development schedule is estimated for the purpose of this report, providing a guide to trip rates only and does not constitute the final development scheme which would be the subject of a future planning application. The following parameters have been selected within the TRICS database for the purpose of this assessment:

- Residential – Houses Privately Owned;
- Multi-Modal Surveys;
- Sites in England and Wales only (excluding Greater London)
- 20-80 units;
- Weekday Surveys only;

➤ ‘Suburban Locations’ and ‘Edge of Town’ only.

4.6.2. The resulting vehicle trip rates and trip generation based on an indicative 49 residential dwellings is shown in Table 6. The full TRICS outputs are attached at Appendix C.

Table 6 – TRICS Trip Rates and Total Vehicle Trip Generation

| | AM Peak (0800-0900) | | | PM Peak (1700-1800) | | | Daily (0700-1900) | | |
|----------------------------|---------------------|-------|---------|---------------------|-------|---------|-------------------|-------|---------|
| | Arr. | Dep. | Two-Way | Arr. | Dep. | Two-Way | Arr. | Dep. | Two-Way |
| Total Vehicle Trip Rate | 0.166 | 0.366 | 0.532 | 0.355 | 0.187 | 0.542 | 2.563 | 2.603 | 5.166 |
| Trip Generation (49 Units) | 8 | 18 | 26 | 17 | 9 | 26 | 126 | 128 | 254 |

4.6.3. The potential development of around 49 residential dwellings could produce a total of 26 two-way vehicle trips during the morning (08:00-09:00) and evening (17:00-18:00) peak periods and 254 two-way vehicle trips across a 12-hour day.

4.6.4. The method of travel to work using Census 2011 data has been applied to calculate the potential multi-modal trip generation for the site. The anticipated multi-modal trip generation is outlined in Table 7.

Table 7 – Multi-Modal Trip Generation

| Mode | Census 2011 Mode Share | AM Peak (0800-0900) | | | PM Peak (1700-1800) | | | Daily (12-hour) | | |
|---------------------|------------------------|---------------------|-----------|-----------|---------------------|-----------|-----------|-----------------|------------|------------|
| | | Arr. | Dep. | Two-Way | Arr. | Dep. | Two-Way | Arr. | Dep. | Two-Way |
| Rail or Underground | 4.7% | 0 | 1 | 1 | 1 | 1 | 2 | 8 | 8 | 16 |
| Bus | 9.9% | 1 | 3 | 4 | 3 | 1 | 4 | 18 | 19 | 37 |
| Taxi | 0.0% | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Motorcycle | 0.5% | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 1 | 2 |
| Car Driver | 70.9% | 8 | 18 | 26 | 17 | 9 | 26 | 126 | 128 | 254 |
| Car Passenger | 5.6% | 1 | 1 | 2 | 1 | 1 | 2 | 10 | 10 | 20 |
| Bicycle | 2.4% | 0 | 1 | 1 | 1 | 0 | 1 | 4 | 4 | 8 |
| On Foot | 5.8% | 1 | 1 | 2 | 1 | 1 | 2 | 11 | 11 | 22 |
| Other | 0.2% | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| TOTAL | 100.00% | 11 | 25 | 36 | 24 | 13 | 37 | 178 | 181 | 359 |

4.6.5. The potential development of around 49 dwellings could produce a total of around 36-37 ‘total people’ movements in the peak periods, of which five-six would be undertaken by public transport (primarily by bus), three would be undertaken by active modes and two would be undertaken by car passenger (car share).

4.6.6. It is recognised that, whilst an indication of potential ‘baseline’ travel modes, any new data, for example relevant 2021 Census data (alongside any emerging trends or other available data) or any updated TRICS data, will need to be considered for any future application at the site and the resulting development impact by all modes fully assessed.

4.7. Development Impact and Potential Mitigation Requirements

4.7.1. As part of any future planning application, a junction capacity assessment would be undertaken of the site access junction to ensure the potential development would not result in a detrimental impact on the highway network. However, given the potential development is anticipated to produce a total of 36 two-way vehicular trips in the AM peak period and 37 vehicular trips in the PM peak period, compared with five-day (weekday) average flows along Sulham Hill of around 345 two-way movements during the AM Peak and 269 two-way movements during the PM Peak, it is considered that the

potential access junction(s) type and location would operate well within their theoretical capacity, with sufficient visibility in both directions in accordance with Manual for Streets and DMRB guidance.

- 4.7.2. Considering non-motorised vehicle movements, the development is likely to result in around eight two-way trips taken by walking, cycling or public transport during the AM Peak and nine two-way trips by these modes during the PM peak. Given the proximity of the site to local bus stops, and the accessibility of the site to Tilehurst Railway Station by walking, cycling or by bus, it is likely that all trips by sustainable modes can be made without any use of the car.
- 4.7.3. The site location means that access by sustainable modes can be supported and encouraged, and the potential pedestrian and cycle links onto the existing network will ensure that safe access is available to all potential site users.
- 4.7.4. Through any future planning application at the site, any required mitigation measures would be discussed and agreed with WBC highway officers, to ensure that the site does not result in an there unacceptable impact on highway safety, or a 'severe' residual cumulative impact on the road network in accordance with the NPPF.

4.8. Summary

- The proposed allocation site is likely to support the construction of circa 49 dwellings;
- Vehicle access can be suitably achieved at the site, with two provisional site access design options provided which both demonstrate a priority junction which is capable of supporting access for simultaneous movement of two cars, and access by large vehicles;
- Visibility from the potential access locations can be achieved at 2.4m x 45m in accordance with Manual for Streets requirements for the recorded 85th percentile speeds (31.3mph). Additionally, visibility can be achieved in accordance with DMRB requirements, at 4.5m x 70m;
- Vehicle site access will be subject to further analysis at any application stage which will include a capacity assessment (if required by WBC);
- There are opportunities to link the site to the surrounding residential area by foot and cycle, through connections to the existing PRoW (Back Lane) and through links to the wider footpath network, with routes directly to local bus stops to support end-to-end trips by sustainable modes;
- A provisional trip generation assessment demonstrates that the site could generate up to 36-37two-way total people movements in the peak hours, including 26 by single occupancy vehicle and 8-9 by sustainable modes.
- Through any future application at the site, any required mitigation and/or improvement measures would be discussed and agreed with WBC.

5. Summary and Conclusions

- 5.1.1. This Transport and Highways Appraisal has been prepared by Evoke to support the promotion of a parcel of land located to the east of Sulham Hill, Tilehurst through the updated West Berkshire Local Plan as being suitable to support the development of approximately 49 residential units.

Accessibility

- 5.1.2. The site is well located in relation to the existing built up suburb of Tilehurst, including bus stops, schools, employment opportunities and other local shops and services. The residential nature of the site would integrate well with the existing nature of the surrounding area.
- 5.1.3. Additionally, the existing foot and cycle network, including the Back Lane Bridleway along the northern site boundary, presents a significant opportunity to link the site via a traffic free route to the surrounding area, which directly links to bus stops on Dark Lane.

Road Safety

- 5.1.4. No highway safety issues have been identified in the immediate vicinity of the site. There are not considered to be any grounds on highway safety which would prevent the future development of the site. However, detailed collision data will be subject to further investigation as part of any planning application for the site.

Site Access

- 5.1.5. Vehicle access can be suitably achieved at the site, with two provisional site access design options provided supported by swept path analysis and a visibility splay assessment. The visibility assessment considers both Manual for Streets and DMRB requirements based on the recorded road speeds in the vicinity of the site. Vehicle site access will be subject to further analysis at any application stage which will include a capacity assessment (if required by WBC).
- 5.1.6. There are opportunities to link the site to the surrounding residential area by foot and cycle, through connections to the existing PRow (Back Lane) and through links to the wider footpath network, with routes directly to local bus stops to support end-to-end trips by sustainable modes. Through any future application at the site, any required mitigation and/or improvement measures would be discussed and agreed with WBC.

Trip Generation and Impact

- 5.1.7. Due to the site's accessibility by sustainable modes of transport, there will be opportunity to encourage a shift away from private car use. It is not considered that the proposed trip generation would result in a severe residual impact on the surrounding highway network, with any required mitigation works investigated and discussed with WBC as part of any planning application.

Summary

- 5.1.8. Taking into consideration the highways and transport appraisals outlined above it is considered that safe, suitable access can be provided to the site which will ensure that the site could be unlocked for the future residential development.
- 5.1.9. Should the site be developed for residential development then a Transport Statement/Assessment would be produced to fully evaluate the impacts and, if appropriate, identify mitigation measures to address any potential issues.
- 5.1.10. Nonetheless there is considered to be no transport or highway reasons for the site not to be allocated/approved for future residential development.

Appendix A – ATC Outputs



SITE: Sulham Hill

LOCATION: Attached to direction/ road bend sign

GRID REFERENCE: 51.463819, -1.057299

DIRECTION: EASTBOUND

SPEED LIMIT: NSL

| Hour | Tue | Wed | Thu | Fri | Sat | Sun | Mon | Averages | |
|-----------|--------|--------|--------|--------|--------|--------|--------|----------|--------|
| | 24-Jan | 25-Jan | 26-Jan | 27-Jan | 28-Jan | 29-Jan | 30-Jan | 1-5. | 1-7. |
| 0000-0100 | 1 | 1 | 0 | 3 | 3 | 4 | 1 | 1.2 | 1.9 |
| 0100-0200 | 3 | 1 | 2 | 1 | 0 | 5 | 1 | 1.6 | 1.9 |
| 0200-0300 | 0 | 3 | 3 | 1 | 1 | 1 | 0 | 1.4 | 1.3 |
| 0300-0400 | 2 | 1 | 1 | 3 | 0 | 1 | 2 | 1.8 | 1.4 |
| 0400-0500 | 0 | 0 | 0 | 1 | 0 | 1 | 1 | 0.4 | 0.4 |
| 0500-0600 | 3 | 2 | 6 | 3 | 3 | 2 | 5 | 3.8 | 3.4 |
| 0600-0700 | 7 | 9 | 14 | 12 | 2 | 3 | 12 | 10.8 | 8.4 |
| 0700-0800 | 36 | 45 | 48 | 39 | 15 | 6 | 62 | 46 | 35.9 |
| 0800-0900 | 133 | 128 | 152 | 154 | 52 | 25 | 123 | 138 | 109.6 |
| 0900-1000 | 52 | 60 | 60 | 64 | 54 | 50 | 62 | 59.6 | 57.4 |
| 1000-1100 | 41 | 47 | 49 | 51 | 77 | 74 | 43 | 46.2 | 54.6 |
| 1100-1200 | 50 | 56 | 61 | 69 | 102 | 98 | 79 | 63 | 73.6 |
| 1200-1300 | 77 | 85 | 82 | 82 | 91 | 89 | 73 | 79.8 | 82.7 |
| 1300-1400 | 71 | 72 | 78 | 100 | 82 | 79 | 76 | 79.4 | 79.7 |
| 1400-1500 | 103 | 120 | 109 | 111 | 95 | 87 | 94 | 107.4 | 102.7 |
| 1500-1600 | 118 | 131 | 142 | 167 | 85 | 77 | 138 | 139.2 | 122.6 |
| 1600-1700 | 163 | 163 | 158 | 175 | 81 | 82 | 143 | 160.4 | 137.9 |
| 1700-1800 | 158 | 161 | 186 | 157 | 68 | 67 | 194 | 171.2 | 141.6 |
| 1800-1900 | 79 | 78 | 93 | 76 | 39 | 45 | 73 | 79.8 | 69 |
| 1900-2000 | 50 | 59 | 59 | 46 | 41 | 34 | 50 | 52.8 | 48.4 |
| 2000-2100 | 26 | 29 | 39 | 23 | 23 | 21 | 32 | 29.8 | 27.6 |
| 2100-2200 | 17 | 24 | 25 | 23 | 8 | 17 | 26 | 23 | 20 |
| 2200-2300 | 14 | 21 | 13 | 18 | 16 | 12 | 11 | 15.4 | 15 |
| 2300-2400 | 3 | 5 | 7 | 9 | 8 | 4 | 5 | 5.8 | 5.9 |
| Totals | | | | | | | | | |
| 0700-1900 | 1081 | 1146 | 1218 | 1245 | 841 | 779 | 1160 | 1170 | 1067.1 |
| 0600-2200 | 1181 | 1267 | 1355 | 1349 | 915 | 854 | 1280 | 1286.4 | 1171.6 |
| 0600-0000 | 1198 | 1293 | 1375 | 1376 | 939 | 870 | 1296 | 1307.6 | 1192.4 |
| 0000-0000 | 1207 | 1301 | 1387 | 1388 | 946 | 884 | 1306 | 1317.8 | 1202.7 |
| AM Peak | 800 | 800 | 800 | 800 | 1100 | 1100 | 800 | | |
| | 133 | 128 | 152 | 154 | 102 | 98 | 123 | | |
| PM Peak | 1600 | 1600 | 1700 | 1600 | 1400 | 1200 | 1700 | | |
| | 163 | 163 | 186 | 175 | 95 | 89 | 194 | | |



SITE: Sulham Hill

LOCATION: Attached to direction/ road bend sign

GRID REFERENCE: 51.463819, -1.057299

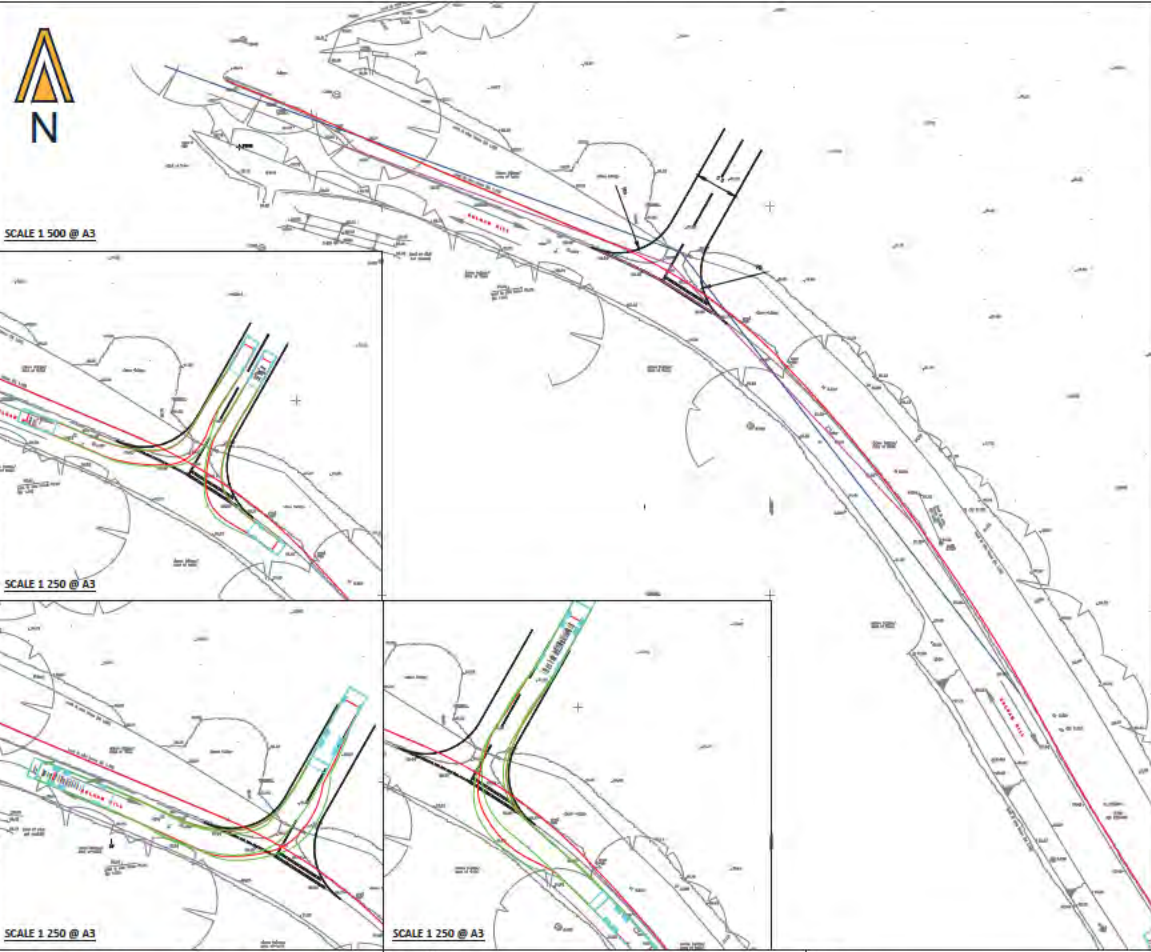
DIRECTION: WESTBOUND

SPEED LIMIT: NSL

| Hour | Tue | Wed | Thu | Fri | Sat | Sun | Mon | Averages | |
|-----------|--------|--------|--------|--------|--------|--------|--------|----------|--------|
| | 24-Jan | 25-Jan | 26-Jan | 27-Jan | 28-Jan | 29-Jan | 30-Jan | 1-5. | 1-7. |
| 0000-0100 | 2 | 1 | 1 | 3 | 3 | 1 | 0 | 1.4 | 1.6 |
| 0100-0200 | 1 | 0 | 1 | 0 | 2 | 4 | 0 | 0.4 | 1.1 |
| 0200-0300 | 1 | 1 | 1 | 0 | 0 | 3 | 2 | 1 | 1.1 |
| 0300-0400 | 0 | 3 | 3 | 4 | 2 | 2 | 1 | 2.2 | 2.1 |
| 0400-0500 | 5 | 1 | 4 | 5 | 2 | 0 | 4 | 3.8 | 3 |
| 0500-0600 | 3 | 7 | 10 | 12 | 4 | 3 | 12 | 8.8 | 7.3 |
| 0600-0700 | 34 | 43 | 46 | 39 | 13 | 4 | 51 | 42.6 | 32.9 |
| 0700-0800 | 172 | 175 | 211 | 175 | 33 | 17 | 197 | 186 | 140 |
| 0800-0900 | 205 | 214 | 219 | 183 | 79 | 57 | 214 | 207 | 167.3 |
| 0900-1000 | 96 | 93 | 98 | 107 | 95 | 81 | 91 | 97 | 94.4 |
| 1000-1100 | 77 | 55 | 86 | 62 | 99 | 85 | 67 | 69.4 | 75.9 |
| 1100-1200 | 49 | 58 | 61 | 76 | 97 | 113 | 69 | 62.6 | 74.7 |
| 1200-1300 | 56 | 79 | 77 | 88 | 105 | 92 | 62 | 72.4 | 79.9 |
| 1300-1400 | 66 | 64 | 58 | 75 | 90 | 80 | 78 | 68.2 | 73 |
| 1400-1500 | 66 | 80 | 78 | 91 | 80 | 82 | 85 | 80 | 80.3 |
| 1500-1600 | 117 | 122 | 119 | 132 | 72 | 65 | 107 | 119.4 | 104.9 |
| 1600-1700 | 108 | 104 | 95 | 116 | 55 | 54 | 119 | 108.4 | 93 |
| 1700-1800 | 89 | 76 | 82 | 100 | 48 | 49 | 98 | 89 | 77.4 |
| 1800-1900 | 50 | 79 | 78 | 78 | 41 | 34 | 70 | 71 | 61.4 |
| 1900-2000 | 36 | 36 | 56 | 47 | 34 | 25 | 40 | 43 | 39.1 |
| 2000-2100 | 21 | 23 | 26 | 34 | 23 | 22 | 34 | 27.6 | 26.1 |
| 2100-2200 | 18 | 13 | 19 | 16 | 15 | 10 | 16 | 16.4 | 15.3 |
| 2200-2300 | 14 | 14 | 8 | 18 | 12 | 12 | 11 | 13 | 12.7 |
| 2300-2400 | 4 | 1 | 6 | 6 | 5 | 2 | 6 | 4.6 | 4.3 |
| Totals | | | | | | | | | |
| 0700-1900 | 1151 | 1199 | 1262 | 1283 | 894 | 809 | 1257 | 1230.4 | 1122.1 |
| 0600-2200 | 1260 | 1314 | 1409 | 1419 | 979 | 870 | 1398 | 1360 | 1235.6 |
| 0600-0000 | 1278 | 1329 | 1423 | 1443 | 996 | 884 | 1415 | 1377.6 | 1252.6 |
| 0000-0000 | 1290 | 1342 | 1443 | 1467 | 1009 | 897 | 1434 | 1395.2 | 1268.9 |
| AM Peak | 800 | 800 | 800 | 800 | 1000 | 1100 | 800 | | |
| | 205 | 214 | 219 | 183 | 99 | 113 | 214 | | |
| PM Peak | 1500 | 1500 | 1500 | 1500 | 1200 | 1200 | 1600 | | |
| | 117 | 122 | 119 | 132 | 105 | 92 | 119 | | |

Appendix B – Potential Site Access Options

C:\Users\bar11\Documents\Evoke Transport\Evoke Projects - Documents\2023\16-23-0010 Long Lane, Sulham Hill\150 Drawings\1_A\ubCAD\16-23-0010-003.dwg



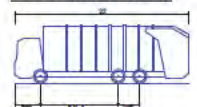
NOTES

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3. HIGHWAY BOUNDARY MAPPING, RECEIVED FROM WBC INDICATIVELY DEMONSTRATED IN RED.

VISIBILITY SPLAY KEY

- 2.4m x 45m IN ACCORDANCE WITH RECORDED SPEEDS OF 31.3MPH (MANUAL FOR STREETS REQUIREMENTS)
- 4.5m x 70m IN ACCORDANCE WITH RECORDED SPEEDS OF 32MPH (DMRB REQUIREMENTS)

LARGE REFUSE VEHICLE PROFILE



Phoenix 2 Duo Recycler (P2-15W with E lite 6x4 chassis)
 Overall Length 11.250m
 Overall Width 2.530m
 Overall Body Height 3.756m
 Min Body Ground Clearance 0.305m
 Track Width 2.530m
 Lock to lock time 4.00s
 Kerb to Kerb Turning Radius 11.550m

CAR VEHICLE PROFILE



Estate Car
 Overall Length 4.845m
 Overall Width 1.750m
 Overall Body Height 1.420m
 Min Body Ground Clearance 0.189m
 Max Track Width 1.555m
 Lock to lock time 4.00s
 Kerb to Kerb Turning Radius 4.950m

| | | | | |
|-----|-------------|----|----|----------|
| Rev | Amendment | BW | DF | 27.02.23 |
| - | FIRST ISSUE | BW | DF | 27.02.23 |

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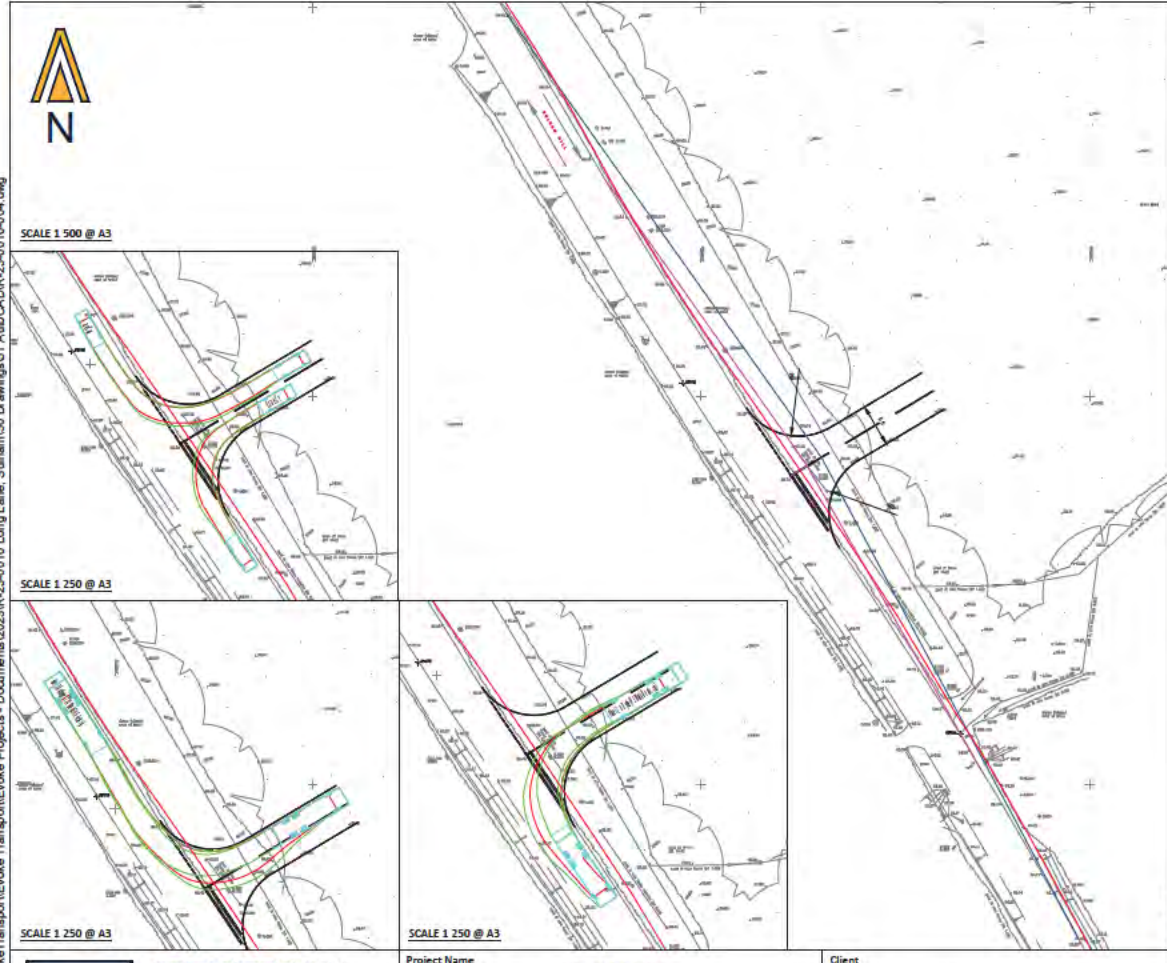
Telephone 01183 800 182
 E info@evoketransport.co.uk
 W www.evoketransport.co.uk

| | |
|---------------|-------------------------------------|
| Project Name | SULHAM HILL TILEHURST |
| Drawing Title | SITE ACCESS ARRANGEMENT OPTION 1 |

| | |
|--------|-----------------|
| Client | DARCLIFFE HOMES |
|--------|-----------------|

| | | | | | | |
|------------|---------------|-------------|-----------|------|----------|---|
| Drawn by | BW | Approved by | DF | Date | 27.02.23 | |
| Scale | AS SHOWN | Job No | R-23-0010 | | | |
| Drawing No | R-23-0010-003 | | | | Rev | - |

C:\Users\bar11\Documents\Evoke Transport\Evoke Transport\Evoke Projects - Documents\2023\16-23-0010 Long Lane, Sulham Hill\150 Drawings\151 AutoCAD\R-23-0010-004.dwg



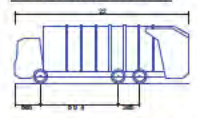
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3. HIGHWAY BOUNDARY MAPPING, RECEIVED FROM WBC INDICATIVELY DEMONSTRATED IN RED.

VISIBILITY SPLAY KEY

- 2.4m x 45m IN ACCORDANCE WITH RECORDED SPEEDS OF 31.3MPH (MANUAL FOR STREETS REQUIREMENTS)
- 4.5m x 70m IN ACCORDANCE WITH RECORDED SPEEDS OF 32MPH (DMRB REQUIREMENTS)

LARGE REFUSE VEHICLE PROFILE



Phoenix 2 Duo Recycler (P2-15W with E lite 6x4 chassis)
 Overall Length 11.220m
 Overall Width 2.530m
 Overall Body Height 3.756m
 Min Body Ground Clearance 0.305m
 Track Width 2.530m
 Lock to lock time 4.00s
 Kerb to Kerb Turning Radius 11.550m

CAR VEHICLE PROFILE



Estate Car
 Overall Length 4.845m
 Overall Width 1.750m
 Overall Body Height 1.420m
 Min Body Ground Clearance 0.189m
 Max Track Width 1.555m
 Lock to lock time 4.00s
 Kerb to Kerb Turning Radius 4.950m

| | | | | |
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| Rev | Amendment | BW | DF | 27.02.23 |
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|---------------|-------------|----------|
| Drawn by | Approved by | Date |
| BW | DF | 27.02.23 |
| Scale | Job No | |
| AS SHOWN | R-23-0010 | |
| Drawing No | | Rev |
| R-23-0010-004 | | - |

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| | |
|---------------|-------------------------------------|
| Project Name | SULHAM HILL TILEHURST |
| Client | DARCLIFFE HOMES |
| Drawing Title | SITE ACCESS ARRANGEMENT OPTION 2 |

Appendix C – TRICS Outputs

TRIP RATE CALCULATION SELECTION PARAMETERS:

Land Use : 03 - RESIDENTIAL
 Category : A - HOUSES PRIVATELY OWNED

TOTAL VEHICLESSelected regions and areas:

| | | |
|-----------|---|--------|
| 02 | SOUTH EAST | |
| | CT CENTRAL BEDFORDSHIRE | 1 days |
| | HC HAMPSHIRE | 5 days |
| | KC KENT | 1 days |
| | SC SURREY | 2 days |
| | WS WEST SUSSEX | 1 days |
| 03 | SOUTH WEST | |
| | BC BOURNEMOUTH CHRISTCHURCH & POOLE | 1 days |
| | DC DORSET | 1 days |
| | DV DEVON | 1 days |
| | SD SWINDON | 1 days |
| | SM SOMERSET | 1 days |
| | TB TORBAY | 1 days |
| 04 | EAST ANGLIA | |
| | NF NORFOLK | 6 days |
| | PB PETERBOROUGH | 1 days |
| | SF SUFFOLK | 1 days |
| 05 | EAST MIDLANDS | |
| | NT NOTTINGHAMSHIRE | 1 days |
| 06 | WEST MIDLANDS | |
| | ST STAFFORDSHIRE | 1 days |
| | WK WARWICKSHIRE | 2 days |
| 07 | YORKSHIRE & NORTH LINCOLNSHIRE | |
| | NY NORTH YORKSHIRE | 1 days |
| 08 | NORTH WEST | |
| | EC CHESHIRE EAST | 1 days |
| | LC LANCASHIRE | 1 days |
| 09 | NORTH | |
| | DH DURHAM | 1 days |
| 10 | WALES | |
| | PS POWYS | 1 days |

This section displays the number of survey days per TRICS® sub-region in the selected set

Primary Filtering selection:

This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.

Parameter: No of Dwellings
Actual Range: 23 to 80 (units:)
Range Selected by User: 20 to 80 (units:)

Parking Spaces Range: All Surveys Included

Parking Spaces per Dwelling Range: All Surveys Included

Bedrooms per Dwelling Range: All Surveys Included

Percentage of dwellings privately owned: All Surveys Included

Public Transport Provision:

Selection by: Include all surveys

Date Range: 01/01/14 to 14/10/22

This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.

Selected survey days:

| | |
|-----------|--------|
| Monday | 6 days |
| Tuesday | 6 days |
| Wednesday | 8 days |
| Thursday | 7 days |
| Friday | 6 days |

This data displays the number of selected surveys by day of the week.

Selected survey types:

| | |
|-----------------------|---------|
| Manual count | 32 days |
| Directional ATC Count | 1 days |

This data displays the number of manual classified surveys and the number of unclassified ATC surveys, the total adding up to the overall number of surveys in the selected set. Manual surveys are undertaken using staff, whilst ATC surveys are undertaken using machines.

Selected Locations:

| | |
|------------------------------------|----|
| Suburban Area (PPS6 Out of Centre) | 9 |
| Edge of Town | 24 |

This data displays the number of surveys per main location category within the selected set. The main location categories consist of Free Standing, Edge of Town, Suburban Area, Neighbourhood Centre, Edge of Town Centre, Town Centre and Not Known.

Selected Location Sub Categories:

| | |
|------------------|----|
| Residential Zone | 30 |
| Out of Town | 1 |
| No Sub Category | 2 |

This data displays the number of surveys per location sub-category within the selected set. The location sub-categories consist of Commercial Zone, Industrial Zone, Development Zone, Residential Zone, Retail Zone, Built-Up Zone, Village, Out of Town, High Street and No Sub Category.

Inclusion of Servicing Vehicles Counts:

| | |
|-----------------------------|--------------------|
| Servicing vehicles Included | 10 days - Selected |
| Servicing vehicles Excluded | 31 days - Selected |

Secondary Filtering selection:Use Class:

C3 33 days

This data displays the number of surveys per Use Class classification within the selected set. The Use Classes Order (England) 2020 has been used for this purpose, which can be found within the Library module of TRICS®.

Population within 500m Range:

All Surveys Included

Secondary Filtering selection (Cont.):Population within 1 mile:

| | |
|------------------|---------|
| 1,001 to 5,000 | 2 days |
| 5,001 to 10,000 | 10 days |
| 10,001 to 15,000 | 9 days |
| 15,001 to 20,000 | 4 days |
| 20,001 to 25,000 | 4 days |
| 25,001 to 50,000 | 4 days |

This data displays the number of selected surveys within stated 1-mile radii of population.

Population within 5 miles:

| | |
|--------------------|---------|
| 5,001 to 25,000 | 6 days |
| 25,001 to 50,000 | 4 days |
| 50,001 to 75,000 | 3 days |
| 75,001 to 100,000 | 5 days |
| 100,001 to 125,000 | 2 days |
| 125,001 to 250,000 | 10 days |
| 250,001 to 500,000 | 3 days |

This data displays the number of selected surveys within stated 5-mile radii of population.

Car ownership within 5 miles:

| | |
|------------|---------|
| 0.6 to 1.0 | 5 days |
| 1.1 to 1.5 | 27 days |
| 1.6 to 2.0 | 1 days |

This data displays the number of selected surveys within stated ranges of average cars owned per residential dwelling, within a radius of 5-miles of selected survey sites.

Travel Plan:

| | |
|-----|---------|
| Yes | 15 days |
| No | 18 days |

This data displays the number of surveys within the selected set that were undertaken at sites with Travel Plans in place, and the number of surveys that were undertaken at sites without Travel Plans.

PTAL Rating:

| | |
|-----------------|---------|
| No PTAL Present | 33 days |
|-----------------|---------|

This data displays the number of selected surveys with PTAL Ratings.

LIST OF SITES relevant to selection parameters

| | | | |
|----------|------------------------------------|-------------------------------------|---|
| 1 | BC-03-A-02 | BUNGALOWS | BOURNEMOUTH CHRISTCHURCH & POOLE |
| | HURSTDENE ROAD | | |
| | BOURNEMOUTH | | |
| | CASTLE LANE WEST | | |
| | Edge of Town | | |
| | Residential Zone | | |
| | Total No of Dwellings: | 28 | |
| | Survey date: MONDAY | 24/03/14 | Survey Type: MANUAL |
| 2 | CT-03-A-01 | MIXED HOUSES | CENTRAL BEDFORDSHIRE |
| | ARLESEY ROAD | | |
| | STOTFOLD | | |
| | Edge of Town | | |
| | Residential Zone | | |
| | Total No of Dwellings: | 46 | |
| | Survey date: WEDNESDAY | 22/06/22 | Survey Type: MANUAL |
| 3 | DC-03-A-09 | MIXED HOUSES | DORSET |
| | A350 | | |
| | SHAFTESBURY | | |
| | Edge of Town | | |
| | No Sub Category | | |
| | Total No of Dwellings: | 50 | |
| | Survey date: FRIDAY | 19/11/21 | Survey Type: MANUAL |
| 4 | DH-03-A-03 | SEMI-DETACHED & TERRACED | DURHAM |
| | PILGRIMS WAY | | |
| | DURHAM | | |
| | Edge of Town | | |
| | Residential Zone | | |
| | Total No of Dwellings: | 57 | |
| | Survey date: FRIDAY | 19/10/18 | Survey Type: MANUAL |
| 5 | DV-03-A-03 | TERRACED & SEMI DETACHED | DEVON |
| | LOWER BRAND LANE | | |
| | HONITON | | |
| | Suburban Area (PPS6 Out of Centre) | | |
| | Residential Zone | | |
| | Total No of Dwellings: | 70 | |
| | Survey date: MONDAY | 28/09/15 | Survey Type: MANUAL |
| 6 | EC-03-A-06 | TERRACED HOUSES | CHESHIRE EAST |
| | GREYSTOKE ROAD | | |
| | MACCLESFIELD | | |
| | HURDSFIELD | | |
| | Edge of Town | | |
| | Residential Zone | | |
| | Total No of Dwellings: | 24 | |
| | Survey date: MONDAY | 24/11/14 | Survey Type: MANUAL |
| 7 | HC-03-A-21 | TERRACED & SEMI-DETACHED | HAMPSHIRE |
| | PRIESTLEY ROAD | | |
| | BASINGSTOKE | | |
| | HOUNDMILLS | | |
| | Edge of Town | | |
| | Residential Zone | | |
| | Total No of Dwellings: | 39 | |
| | Survey date: TUESDAY | 13/11/18 | Survey Type: MANUAL |

LIST OF SITES relevant to selection parameters (Cont.)

| | | | |
|-----------|---|---------------------------------|---------------------|
| 8 | HC-03-A-22 | MIXED HOUSES | HAMPSHIRE |
| | BOW LAKE GARDENS NEAR EASTLEIGH BISHOPSTOKE Edge of Town Residential Zone Total No of Dwellings: 40 Survey date: WEDNESDAY 31/10/18 | | Survey Type: MANUAL |
| 9 | HC-03-A-23 | HOUSES & FLATS | HAMPSHIRE |
| | CANADA WAY LIPHOOK Suburban Area (PPS6 Out of Centre) Residential Zone Total No of Dwellings: 62 Survey date: TUESDAY 19/11/19 | | Survey Type: MANUAL |
| 10 | HC-03-A-27 | MIXED HOUSES | HAMPSHIRE |
| | DAIRY ROAD ANDOVER Edge of Town Residential Zone Total No of Dwellings: 73 Survey date: TUESDAY 16/11/21 | | Survey Type: MANUAL |
| 11 | HC-03-A-31 | MIXED HOUSES & FLATS | HAMPSHIRE |
| | KILN ROAD LIPHOOK Edge of Town Residential Zone Total No of Dwellings: 44 Survey date: FRIDAY 07/10/22 | | Survey Type: MANUAL |
| 12 | KC-03-A-03 | MIXED HOUSES & FLATS | KENT |
| | HYTHE ROAD ASHFORD WILLESBOROUGH Suburban Area (PPS6 Out of Centre) Residential Zone Total No of Dwellings: 51 Survey date: THURSDAY 14/07/16 | | Survey Type: MANUAL |
| 13 | LC-03-A-31 | DETACHED HOUSES | LANCASHIRE |
| | GREENSIDE PRESTON COTTAM Edge of Town Residential Zone Total No of Dwellings: 32 Survey date: FRIDAY 17/11/17 | | Survey Type: MANUAL |
| 14 | NF-03-A-05 | MIXED HOUSES | NORFOLK |
| | HEATH DRIVE HOLT Edge of Town Residential Zone Total No of Dwellings: 40 Survey date: THURSDAY 19/09/19 | | Survey Type: MANUAL |
| 15 | NF-03-A-25 | MIXED HOUSES & FLATS | NORFOLK |
| | WOODFARM LANE GORLESTON-ON-SEA Edge of Town Residential Zone Total No of Dwellings: 55 Survey date: TUESDAY 21/09/21 | | Survey Type: MANUAL |

LIST OF SITES relevant to selection parameters (Cont.)

| | | | | |
|----|--|---------------------------------|----------|------------------------------------|
| 16 | NF-03-A-34 NORWICH ROAD SWAFFHAM | MIXED HOUSES | | NORFOLK |
| | Edge of Town Out of Town Total No of Dwellings: | | 80 | |
| | Survey date: TUESDAY | | 27/09/22 | Survey Type: MANUAL |
| 17 | NF-03-A-36 LONDON ROAD WYMONDHAM | MIXED HOUSES | | NORFOLK |
| | Edge of Town No Sub Category Total No of Dwellings: | | 75 | |
| | Survey date: THURSDAY | | 29/09/22 | Survey Type: MANUAL |
| 18 | NF-03-A-37 GREENFIELDS ROAD DEREHAM | MIXED HOUSES | | NORFOLK |
| | Edge of Town Residential Zone Total No of Dwellings: | | 44 | |
| | Survey date: TUESDAY | | 27/09/22 | Survey Type: MANUAL |
| 19 | NF-03-A-50 BRANDON ROAD SWAFFHAM | MIXED HOUSES | | NORFOLK |
| | Edge of Town Residential Zone Total No of Dwellings: | | 75 | |
| | Survey date: FRIDAY | | 14/10/16 | Survey Type: DIRECTIONAL ATC COUNT |
| 20 | NT-03-A-08 WIGHAY ROAD HUCKNALL | DETACHED HOUSES | | NOTTINGHAMSHIRE |
| | Edge of Town Residential Zone Total No of Dwellings: | | 36 | |
| | Survey date: MONDAY | | 18/10/21 | Survey Type: MANUAL |
| 21 | NY-03-A-14 PALACE ROAD RIPON | DETACHED & BUNGALOWS | | NORTH YORKSHIRE |
| | Edge of Town Residential Zone Total No of Dwellings: | | 45 | |
| | Survey date: WEDNESDAY | | 18/05/22 | Survey Type: MANUAL |
| 22 | PB-03-A-04 EASTFIELD ROAD PETERBOROUGH | DETACHED HOUSES | | PETERBOROUGH |
| | Suburban Area (PPS6 Out of Centre) Residential Zone Total No of Dwellings: | | 28 | |
| | Survey date: MONDAY | | 17/10/16 | Survey Type: MANUAL |
| 23 | PS-03-A-02 GUNROG ROAD WELSHPOOL | DETACHED/SEMI-DETACHED | | POWYS |
| | Suburban Area (PPS6 Out of Centre) Residential Zone Total No of Dwellings: | | 28 | |
| | Survey date: MONDAY | | 11/05/15 | Survey Type: MANUAL |

LIST OF SITES relevant to selection parameters (Cont.)

| | | | | |
|-----------|--|--------------------------------|----------|----------------------|
| 24 | SC-03-A-04 HIGH ROAD BYFLEET | DETACHED & TERRACED | | SURREY |
| | Edge of Town Residential Zone Total No of Dwellings: | | 71 | |
| | Survey date: THURSDAY | | 23/01/14 | Survey Type: MANUAL |
| 25 | SC-03-A-07 FOLLY HILL FARNHAM | MIXED HOUSES | | SURREY |
| | Edge of Town Residential Zone Total No of Dwellings: | | 41 | |
| | Survey date: WEDNESDAY | | 11/05/22 | Survey Type: MANUAL |
| 26 | SD-03-A-01 HEADLANDS GROVE SWINDON | SEMI DETACHED | | SWINDON |
| | Suburban Area (PPS6 Out of Centre) Residential Zone Total No of Dwellings: | | 27 | |
| | Survey date: THURSDAY | | 22/09/16 | Survey Type: MANUAL |
| 27 | SF-03-A-07 FOXHALL ROAD IPSWICH | MIXED HOUSES | | SUFFOLK |
| | Suburban Area (PPS6 Out of Centre) Residential Zone Total No of Dwellings: | | 73 | |
| | Survey date: THURSDAY | | 09/05/19 | Survey Type: MANUAL |
| 28 | SM-03-A-01 WEMBDON ROAD BRIDGWATER NORTHFIELD | DETACHED & SEMI | | SOMERSET |
| | Edge of Town Residential Zone Total No of Dwellings: | | 33 | |
| | Survey date: THURSDAY | | 24/09/15 | Survey Type: MANUAL |
| 29 | ST-03-A-08 SILKMORE CRESCENT STAFFORD MEADOWCROFT PARK | DETACHED HOUSES | | STAFFORDSHIRE |
| | Edge of Town Residential Zone Total No of Dwellings: | | 26 | |
| | Survey date: WEDNESDAY | | 22/11/17 | Survey Type: MANUAL |
| 30 | TB-03-A-01 BRONSHILL ROAD TORQUAY | TERRACED HOUSES | | TORBAY |
| | Suburban Area (PPS6 Out of Centre) Residential Zone Total No of Dwellings: | | 37 | |
| | Survey date: WEDNESDAY | | 30/09/15 | Survey Type: MANUAL |
| 31 | WK-03-A-03 BRESE AVENUE WARWICK GUYS CLIFFE | DETACHED HOUSES | | WARWICKSHIRE |
| | Suburban Area (PPS6 Out of Centre) Residential Zone Total No of Dwellings: | | 23 | |
| | Survey date: WEDNESDAY | | 25/09/19 | Survey Type: MANUAL |

LIST OF SITES relevant to selection parameters (Cont.)

| | | | |
|-----------|---|------------------------|---------------------|
| 32 | WK-03-A-04 DALEHOUSE LANE KENILWORTH | DETACHED HOUSES | WARWICKSHIRE |
| | Edge of Town Residential Zone | | |
| | Total No of Dwellings: | 49 | |
| | Survey date: FRIDAY | 27/09/19 | Survey Type: MANUAL |
| 33 | WS-03-A-10 TODDINGTON LANE LITTLEHAMPTON WICK | MIXED HOUSES | WEST SUSSEX |
| | Edge of Town Residential Zone | | |
| | Total No of Dwellings: | 79 | |
| | Survey date: WEDNESDAY | 07/11/18 | Survey Type: MANUAL |

This section provides a list of all survey sites and days in the selected set. For each individual survey site, it displays a unique site reference code and site address, the selected trip rate calculation parameter and its value, the day of the week and date of each survey, and whether the survey was a manual classified count or an ATC count.

MANUALLY DESELECTED SITES

| Site Ref | Reason for Deselection |
|------------|--|
| AC-03-A-04 | Low Trip Rate (PM) |
| BO-03-A-01 | Undertaken during covid (low trip rates) |
| WO-03-A-07 | Undertaken during covid (low trip rates) |

MANUALLY DESELECTED SURVEYS

| Site Ref | Survey Date | Reason for Deselection |
|------------|-------------|------------------------|
| DH-03-A-01 | 28/03/17 | Low Trip Rates (AM) |

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

TOTAL VEHICLES**Calculation factor: 1 DWELLS****BOLD print indicates peak (busiest) period**

| Time Range | ARRIVALS | | | DEPARTURES | | | TOTALS | | |
|---------------|-----------|-------------|--------------|------------|-------------|--------------|-----------|-------------|--------------|
| | No. Days | Ave. DWELLS | Trip Rate | No. Days | Ave. DWELLS | Trip Rate | No. Days | Ave. DWELLS | Trip Rate |
| 00:00 - 01:00 | | | | | | | | | |
| 01:00 - 02:00 | | | | | | | | | |
| 02:00 - 03:00 | | | | | | | | | |
| 03:00 - 04:00 | | | | | | | | | |
| 04:00 - 05:00 | | | | | | | | | |
| 05:00 - 06:00 | | | | | | | | | |
| 06:00 - 07:00 | | | | | | | | | |
| 07:00 - 08:00 | 33 | 48 | 0.089 | 33 | 48 | 0.328 | 33 | 48 | 0.417 |
| 08:00 - 09:00 | 33 | 48 | 0.166 | 33 | 48 | 0.366 | 33 | 48 | 0.532 |
| 09:00 - 10:00 | 33 | 48 | 0.154 | 33 | 48 | 0.203 | 33 | 48 | 0.357 |
| 10:00 - 11:00 | 33 | 48 | 0.162 | 33 | 48 | 0.194 | 33 | 48 | 0.356 |
| 11:00 - 12:00 | 33 | 48 | 0.163 | 33 | 48 | 0.175 | 33 | 48 | 0.338 |
| 12:00 - 13:00 | 33 | 48 | 0.198 | 33 | 48 | 0.197 | 33 | 48 | 0.395 |
| 13:00 - 14:00 | 33 | 48 | 0.192 | 33 | 48 | 0.181 | 33 | 48 | 0.373 |
| 14:00 - 15:00 | 33 | 48 | 0.188 | 33 | 48 | 0.206 | 33 | 48 | 0.394 |
| 15:00 - 16:00 | 33 | 48 | 0.313 | 33 | 48 | 0.207 | 33 | 48 | 0.520 |
| 16:00 - 17:00 | 33 | 48 | 0.319 | 33 | 48 | 0.205 | 33 | 48 | 0.524 |
| 17:00 - 18:00 | 33 | 48 | 0.355 | 33 | 48 | 0.187 | 33 | 48 | 0.542 |
| 18:00 - 19:00 | 33 | 48 | 0.264 | 33 | 48 | 0.154 | 33 | 48 | 0.418 |
| 19:00 - 20:00 | | | | | | | | | |
| 20:00 - 21:00 | | | | | | | | | |
| 21:00 - 22:00 | | | | | | | | | |
| 22:00 - 23:00 | | | | | | | | | |
| 23:00 - 24:00 | | | | | | | | | |
| Total Rates: | | | 2.563 | | | 2.603 | | | 5.166 |

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: $COUNT/TRP*FACT$. Trip rates are then rounded to 3 decimal places.

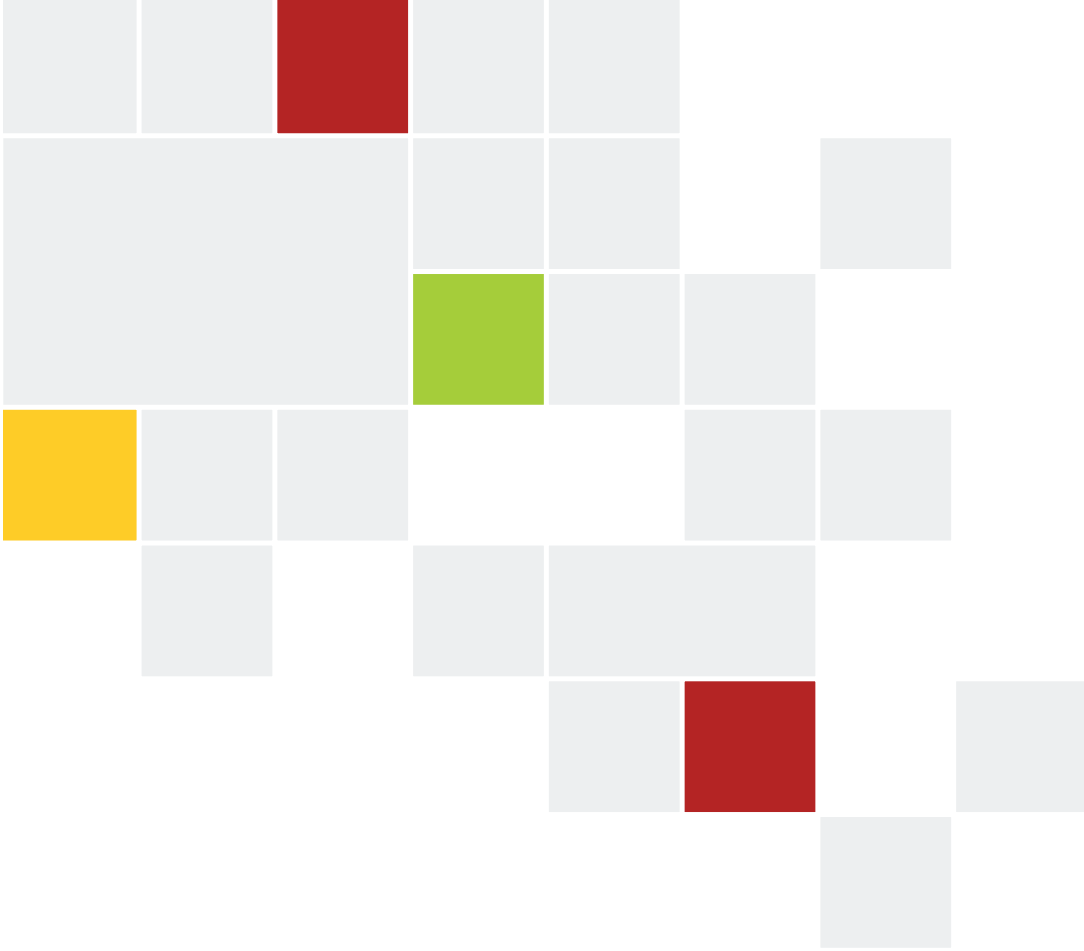
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Parameter summary

| | |
|---|---------------------|
| Trip rate parameter range selected: | 23 - 80 (units:) |
| Survey date range: | 01/01/14 - 14/10/22 |
| Number of weekdays (Monday-Friday): | 34 |
| Number of Saturdays: | 0 |
| Number of Sundays: | 0 |
| Surveys automatically removed from selection: | 5 |
| Surveys manually removed from selection: | 3 |

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.



Boyer

Crowthorne House, Nine Mile Ride, Wokingham, RG40 3GZ | 01344 753 220
wokingham@boyerplanning.co.uk | boyerplanning.co.uk


West Berkshire Local Plan Review 2022-2039
Proposed Submission Representation Form
Ref:
(For official use only)

| | |
|--|--|
| Please complete online or return this form to: | Online: http://consult.westberks.gov.uk/kse |
| | By email: planningpolicy@westberks.gov.uk |
| | By post: Planning Policy, Development and Regulation, Council Offices, Market Street, Newbury, RG14 5LD |
| Return by: | 4:30pm on Friday 3 March 2023 |

This form has two parts:

- Part A - Your details: need only be completed once
- Part B - Your representation(s): please fill in a separate sheet for each representation you wish to make

PART A: Your Details

Please note the following:

- *We cannot register your representation without your details.*
- *Representations cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.*
- *All information will be sent for examination by an independent inspector*
- *All personal data will be handled in line with the Council's Privacy Policy on the Development Plan. You can view the Council's privacy notices at <http://info.westberks.gov.uk/privacynotices>*

| | Your details | Agent's details (if applicable) |
|---|---------------------|--|
| Title: | C/O Agent | Mr |
| First Name:* | | Joe |
| Last Name:* | | Hickling |
| Job title <i>(where relevant):</i> | | Senior Planner |
| Organisation <i>(where relevant):</i> | Darcliffe Homes Ltd | Boyer Planning Ltd |
| Address* <i>Please include postcode:</i> | | Crowthorne House, Nine Mile Ride, Wokingham, Berkshire, RG40 3GZ |
| Email address:* | | ████████████████████ |
| Telephone number: | | ██████████ |

*Mandatory field

Part B – Your Representation

Please use a separate sheet for each representation

The accompanying guidance note available at: <https://www.westberks.gov.uk/lpr-proposed-submission-consultation> will assist you in making representations.

*Your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change(s) as there will **not normally** be a subsequent opportunity to make further representations, **further submissions will ONLY be at the request of the Inspector, based on the matters and issues they identify for examination.***

| | |
|---|--|
| Your name or organisation (and client if you are an agent): | Joe Hickling, Boyer Planning obo Darcliffe Homes |
|---|--|

Please indicate which part of the Local Plan Review this representation relates to:

| | |
|--------------------|----------------|
| Section/paragraph: | Whole Document |
| Policy: | |
| Appendix: | |
| Policies Map: | |
| Other: | |

1. Legally Compliant

Please see the guidance notes for an explanation of what 'legally compliant' means.

Do you consider the Local Plan Review is legally compliant?

Yes

No

Please give reasons for your answer:

Please refer to the accompanying submitted representations.

2. Soundness

Please see the guidance notes for an explanation of what 'soundness' means.

Do you consider the Local Plan Review is sound?

The soundness of the LPR should be assessed against the following criteria from the National Planning Policy Framework (NPPF)

Please tick all that apply:

| NPPF criteria | Yes | No |
|---|-----|----|
| Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development | | |
| Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence | | |
| Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground | | |
| Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF | | |

Please give reasons for your answer:

Please refer to the accompanying submitted representations.

3. Complies with the Duty to Co-operate

Please see the guidance note for an explanation of what 'Duty to Cooperate' means.

Do you consider the Local Plan Review complies with the Duty to Co-operate?

Yes

No

Please give reasons for your answer:

Please refer to the accompanying submitted representations.

4. Proposed Changes

Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this change will make the LPR legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please refer to the accompanying submitted representations.

5. Independent Examination

If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?

Yes

X

No

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Darcliffe have specific land interests within West Berkshire District, which are promoted to be allocated for residential development (Land west of Little Heath Road, Reading). In representing Darcliffe, Boyer are well-placed to advise on the appropriateness of the land promoted for development.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

6. Notification of Progress of the Local Plan Review

Do you wish to be notified of any of the following?

Please tick all that apply:

Tick

| | |
|---|---|
| The submission of the Local Plan Review for Independent Examination | x |
| The publication of the report of the Inspector appointed to carry out the examination | x |
| The adoption of the Local Plan Review | x |

Please ensure that we have either an up to date email address or postal address at which we can contact you. You can amend your contact details by logging onto your account on the Local Plan Consultation Portal or by contacting the Planning Policy team.

| | | | |
|------------------|---|-------------|------------|
| Signature |  | Date | 03/03/2023 |
|------------------|---|-------------|------------|

Your completed representations must be received by the Council by 4:30pm on Friday 3 March 2023.



Land west of Little Heath Road, Tilehurst

Representations for West Berkshire Council Regulation 19
Local Plan Review Consultation



Boyer

Report Control

| | |
|----------------|---|
| Project: | Land west of Little Heath Road, Reading |
| Client: | Darcliffe Homes |
| Reference: | 22.1060 |
| File Origin: | https://lrgcouk.sharepoint.com/:w:/s/BoyerSP/EQm8frN4lppCuSgc3JpTkfcBGu_OiqtDmTCmFkHvjFrug?e=2bpB6d |
| Primary Author | Joseph Hickling & Daniel Nunn |
| Checked By: | Stuart Crickett |

| <i>Issue</i> | <i>Date</i> | <i>Status</i> | <i>Checked By</i> |
|--------------|-------------|---------------|-------------------|
| V1 | 28/02/2023 | Draft | SC |
| V1 | 03/03/2023 | Final | SC |
| | | | |

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APPENDIX

Appendix 1 – Site Location Plan

Appendix 2 – Detailed Assessment of Site Deliverability

1. EXECUTIVE SUMMARY

- 1.1 Boyer have prepared these representations on behalf of Darcliffe Homes Ltd ('Darcliffe'), in response to the 'Regulation 19' consultation relating to the Proposed Submission West Berkshire Local Plan Review (2022 – 2039) ('the emerging plan').
- 1.2 The purpose of these representations is to assist the Council in refining an approach that is consistent with both national planning policy and the tests of soundness. To this end, the representations provide general support to the overall objectives of the emerging plan, but provide detailed commentary in relation to aspects where Darcliffe has concerns with regard to aspects of the emerging plan's soundness.
- 1.3 Darcliffe **supports** the Council's principal objectives, which include seeking to meet the District's local housing needs. However, Darcliffe has concerns in relation to certain aspects of the plan, which we encourage the Council to consider amending prior to submission for examination in public.
- 1.4 Darcliffe recommends the plan is amended in relation to: the duty to co-operate; increasing the level of headroom provided in the identified housing requirement (to both improve the robustness of the planned supply and to deliver additional much-needed affordable housing); allocating a specified amount of development to accommodate unmet need arising in Reading; updating the proposed plan period to include an additional year; and ensuring a robust rolling five-year housing land supply position throughout the plan period, reducing reliance on both the windfall allowance and on larger strategic site allocations that are likely to only begin delivering in the later extent of the plan period.
- 1.5 Darcliffe considers that these concerns could and should be resolved with the introduction of an allocation for residential development, of approximately 322 homes, at Land west of Little Heath Road, Reading (the site).
- 1.6 The site comprises a highly sustainable location, with strong functional links to Reading. As such, the site is well-positioned to effectively meet a significant proportion, if not all, of the identified unmet need arising from Reading. Furthermore, the development of the site would provide a significant contribution to ensuring that West Berkshire's identified housing needs can be met, including the provision of approximately 120 much-needed affordable homes (assuming a contribution of 40% in line with emerging Policy SP19).
- 1.7 There are no absolute or significant constraints to the site's development for approximately 322 new homes, which Darcliffe is committed to bringing forward as part of a high-quality, well-designed scheme that conserves and enhances the special qualities of the North Wessex Downs AONB through sensitive design. The site is located within practical walking and cycling distance from the services and amenities within Tilehurst, and is well-connected to the main settlement of Reading, which provides further linkages to London and other key settlements.

- 1.8 Darcliffe is able to confirm that the site is *available* for development now, represents a *suitable* location for development, and that development of the site is *achievable* with a realistic prospect that housing can be delivered within the first five years of the draft plan period. The site is deliverable and should therefore be favourably regarded in relation to its potential allocation for residential development within the emerging West Berkshire Local Plan. Accordingly, Darcliffe promotes the allocation of the site for approximately 322 new homes in the emerging West Berks Local Plan Review (2022 – 2039).

2. INTRODUCTION

- 2.1 Boyer has been appointed by Darcliffe Homes Ltd ('Darcliffe') to act on their behalf in respect of the ongoing promotion of Land west of Little Heath Road, Reading ('the site') for residential development. These representations respond specifically to West Berkshire District Council's ('the Council') Regulation 19 consultation on the Local Plan Review (2022 – 2039).
- 2.2 These representations are made within the context of the framework of legal compliance and the tests for *soundness* within paragraph 35 of the National Planning Policy Framework ('NPPF'); namely, whether the emerging West Berkshire Local Plan (2022 – 2039) is:
- **Positively prepared** – providing a strategy which as a minimum seeks to meet the area's objectively assessed needs.
 - **Justified** – provides an appropriate strategy, taking into account reasonable alternatives and based on proportionate evidence.
 - **Effective** – deliverable over the plan period and based on effective joint working.
 - **Consistent with national policy** – enabling the delivery of sustainable development.
- 2.3 Darcliffe holds a specific land interest within West Berkshire District, known as Land west of Little Heath Road, Reading ('the site'). A Site Location Plan is provided at **Appendix 1: Site Location Plan**. These representations are aligned with this land interest and accordingly address topics within the West Berkshire Local Plan Review consultation, and its supporting evidence base. We encourage the Council to reconsider its omission of the site, and indeed any sites for allocation at Tilehurst, for a residential allocation before proceeding to the Regulation 22 stage of the local plan review.

Policy Context

- 2.4 West Berkshire District Council adopted the Core Strategy Development Plan Document (2006 - 2026) in July 2012. Five years later, the Council adopted the Housing Site Allocations Development Plan Document in May 2017: which sought to implement the spatial framework set out within the Core Strategy. The adopted Development Plan for the District therefore sets out the spatial strategy to meet development needs up to 2026, and provides a series of site allocations and planning policies that seek to deliver that strategy.
- 2.5 To ensure that planning policies remain relevant and are able to effectively meet the needs of the local community, the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) requires local planning authorities to review local plans at least once every 5 years from their adoption date.
- 2.6 The Proposed Submission West Berkshire Local Plan Review (2022 – 2039) ('the emerging plan'), which is the subject of the 'Regulation 19' consultation, reflects the distilled outcome of that review process. The Draft Plan sets out an updated vision and strategy, alongside an updated series of site allocations and policies that would supersede the adopted Core Strategy upon its adoption. The Council's Local Development Scheme ('LDS') anticipates its adoption in September 2024.

- 2.7 Darcliffe **fully supports** the Council's commitment to review the existing development plan through this process. However, it is considered that there are several aspects of the emerging plan and its evidence-base, which would benefit from further consideration. These areas are detailed within these representations. We encourage the council to address the concerns we've identified to ensure the emerging plan is capable of being found sound.
- 2.8 To assist in resolving our concerns, Darcliffe are promoting the allocation of Land west of Little Heath Road, Reading for the development of approximately 322 new homes, including 129 much needed affordable homes, on-site public open space, SuDS, landscaping, biodiversity enhancements, multiple vehicular access points, pedestrian and cycle links, and associated infrastructure.

Land west of Little Heath Road, Reading ('the site')

- 2.9 Land west of Little Heath Road, Reading ('the site') comprises approximately 13.4 hectares of land adjoining the western extent of Tilehurst, which comprises a suburb of Reading's western extent. The site adjacent to Little Heath Road, opposite the existing residential and community uses that comprise the suburb of Tilehurst.
- 2.10 The site currently comprises a series of undeveloped agricultural fields, which are bordered by established woodland to the north, south and west. Beyond the well-vegetated site boundaries to the north, south, and west lie undeveloped fields within the North Wessex Downs AONB. The site lies entirely within Flood Zone 1 (low flood risk) and has no relevant planning history.
- 2.11 The site was submitted to the Council as part of a Call for Sites exercise, which took place between December 2016 – March 2017. However, the site has not been subject to assessment within the Council's Housing and Economic Land Availability Assessment (2023) ('HELAA'). In support of these representations, Darcliffe have submitted a further call for sites proforma to the Council to provide additional site-specific detail.
- 2.12 For the purposes of these representations, Darcliffe confirm that the site is immediately *available* for development, is *suitable* for residential development, and is *achievable* with a realistic prospect that development would be delivered on the site within the proposed emerging plan period – including from the very first 5-year period.
- 2.13 Consequently, Darcliffe contend that the site is deliverable in relation to the provisions set out in Planning Practice Guidance¹. Further detail is provided in Section 6 and Appendix 2 of these representations in relation to the *availability*, *suitability*, and *achievability* of the site for residential development.

¹ PPG: Housing and economic land availability assessment. Paragraph: 018 Reference ID: 3-018-20190722.

- 2.14 Sections 6, 7 and Appendix 2 of these representations demonstrate the site benefits from being very sustainably located and there are no significant constraints to its development for residential dwellings within the emerging plan period. The development of the site is considered to be achievable whilst conserving and enhancing the special qualities of the AONB, in accordance with proposed Policy SP2: North Wessex Downs AONB.
- 2.15 The development of the site for approximately 322 new homes would contribute toward meeting the District's significant identified housing need in a highly sustainable location, in addition to providing a range of further benefits; including much-needed affordable housing, biodiversity improvements, contributing to meeting Reading's unmet need, the provision of public open space, and financial contributions toward the maintenance of local infrastructure.
- 2.16 Development at this scale is considered to represent an efficient use of the land, whilst respecting the character and setting of the wider landscape in which the site is set. Allocation of the site for approximately 322 dwellings would accord with Paragraph 124 of the NPPF, in which it is made clear that '*...planning policies and decisions should support development that makes efficient use of land*'.
- 2.17 Darcliffe encourage the Council to reconsider the omission of the site for residential development and include an allocation for the development of approximately 322 dwellings on the site within the emerging local plan.

3. THE SCALE OF HOUSING NEED

3.1 This section details Darcliffe's position with regard to the scale of housing need within West Berkshire. In determining the appropriate Housing Requirement for the emerging West Berkshire Local Plan (2022 – 2039), the discussion considers several key themes:

- the scale of housing need in West Berkshire,
- unmet need arising outside of West Berkshire & the Duty-to-Cooperate, and
- the need for affordable housing in West Berkshire.

The Scale of Housing Need in West Berkshire

Calculating Housing Need

3.2 In considering the appropriate housing requirement for the District, the supporting text accompanying emerging Policy SP12: 'Approach to Housing Delivery' identifies that the strategic policies contained within the emerging local plan should be informed by an assessment of Local Housing Need ('LHN').

3.3 The National Planning Policy Framework ('NPPF')² confirms, at paragraph 61, that:

"...to determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach".

3.4 The Government's Standard Method for calculating housing need is set out clearly in Planning Practice Guidance ('PPG')³. Proposed Policy SP12 clarifies that the appropriate LHN figure for West Berkshire comprises 513 dwellings per annum ('dpa'), as derived using the Government's Standard Method.

3.5 Furthermore, no exceptional circumstances have been identified that apply to West Berkshire which justify the use of an alternative starting position approach to the Government's Standard Method. Darcliffe **agrees** there are no exceptional circumstances that justify the application of an alternative assessment of housing need that would result in an identified need below that of the Standard Method, in accordance with PPG.

² Available online at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf.

³ Available online at: <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments#identifying-the-need-for-different-types-of-housing>.

- 3.6 Darcliffe **supports** the Council's use of the Government's Standard Method to derive a minimum housing need figure for the District area. However, as noted within the emerging local plan, it remains pertinent that the LHN figure represents the minimum identified housing need. It should not be considered to represent a maximum quantum of development to be provided.
- 3.7 PPG clarifies there are various circumstances in which it may be appropriate for an authority to plan for a higher number of homes than indicated through the LHN Standard Method calculation. Such circumstances include, but are by no means limited to, situations in which an authority has agreed "*...to take on unmet need from neighbouring authorities, as set out in a statement of common ground*"⁴.

Expressing the Housing Requirement

- 3.8 Darcliffe note it is common practice, and best practice, for Local Planning Authorities ('LPAs') to identify a 'buffer' in the identified housing requirement, to ensure at least the minimum local housing needs of the area are more likely to be delivered in practice. Typically, this is represented in the provision of an amount of headroom in the supply over the minimum target, to account for the practical realities that inhibit sites being delivered as anticipated throughout the plan period.
- 3.9 To this end, the Council has identified an approach to its identified housing requirement that reflects a range, between the LHN minimum of 513 dpa to 538 dpa. Within the supporting text to Policy SP12, the Council clarifies that the housing target of 513 dpa represents a minimum housing delivery figure to be achieved, and therefore that it does not represent a cap, or 'maximum' amount. Darcliffe welcome the Council's recognition that the LHN figure of 513 dpa should be exceeded where possible.
- 3.10 Further, the Council assert that the application of a range within the identified housing requirement of an authority's area represents common practice. However, Darcliffe contend that this is not the case. Indeed, the expression of the housing requirement as a range is considered to introduce unnecessary confusion into the planning process and is therefore considered to be inconsistent with the NPPF.
- 3.11 Paragraph 16 of the NPPF requires that local plans should '*...contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals*'. The expression of a housing requirement that consists of a range between two targets is unnecessarily opaque and introduces entirely unnecessary uncertainty with regard to how the Council's annual housing requirement will be measured and monitored.

⁴ *Ibid.* PPG Paragraph: 010 Reference ID: 2a-010-20201216.

- 3.12 For example, the use of a range introduces uncertainty in relation to how the 5% buffer, as required by paragraph 74 of the NPPF, would be applied in considering the Council's Five-Year Housing Land Supply position ('5YHLS').
- 3.13 Given these concerns, Darcliffe recommends the Council seeks to identify a single housing requirement figure, which reflects the LHN figure, plus an appropriate buffer, in the identified housing requirement, is sufficient to ensure that the District's minimum housing needs will be delivered in practice, providing flexibility in the supply of homes and choice and competition in the market for land.

The Appropriate Buffer in the Housing Requirement

- 3.14 Darcliffe **supports** the Council's recognition that, to be *effective*, the emerging plan must identify a housing requirement, and accompanying housing land supply, which includes an appropriate buffer over the minimum LHN figure of 513 dpa. However, Darcliffe contends the provision of just a 5% buffer over the LHN figure is insufficient to effectively ensure that the District's minimum local housing needs will be delivered in practice.
- 3.15 Research undertaken by Lichfields in 2015 indicated that approximately 10-20% of all planning permissions granted nationally were not ultimately implemented (excluding re-plans)⁵. Given the typical detractors from the implementation of planning permissions; including market fluctuations, delays in the planning process, legal restrictions, complications with the discharge of conditions, *et al.*, it is entirely reasonable to expect that a certain proportion of the allocated housing supply over a fifteen-year period would either not come forward as the Council's trajectory anticipates, or not be delivered at all.
- 3.16 Consequently, to be *effective*, the emerging plan must seek to identify a buffer of at least 10% above the identified minimum local housing need figure. This is considered to be necessary to ensure that those minimum housing needs can be effectively delivered, in practice, over the length of the emerging plan period.
- 3.17 As such, Darcliffe contends that the Council should amend Policy SP12 accordingly, to reflect a housing requirement figure of 564 dwellings per annum. This reflects the identified minimum housing needs as derived through the Standard Method, plus a 10% buffer to ensure that these needs are delivered in practice. This represents an increase in the identified housing requirement by an additional 442 dwellings over the plan period.

⁵ Lichfields (2021) Taking Stock: The geography of housing need, permissions and completions. Available online at: https://lichfields.uk/media/6453/taking-stock-the-geography-of-housing-need-permissions-and-completions_may21.pdf.

- 3.18 To assist the Council in providing an *effective* and robust housing land supply, Darcliffe recommends that the Land west of Little Heath Road, Reading is allocated for the delivery of approximately 322 new homes. In isolation, this site would provide approximately 3.8% of the district's total identified housing requirement over the plan period, which would help to ensure that the district's housing needs would be met effectively and in a sustainable location.

Affordable Housing Need in West Berkshire

- 3.19 West Berkshire faces a significant need for affordable housing over the plan period, as affirmed within the emerging local plan. The conclusions of the Berkshire (including South Bucks) SHMA (2016), updated in 2022⁶, further demonstrate the extent of this need in the plan area, finding there is a need within West Berkshire for approximately 330 new affordable homes per annum up to 2039.
- 3.20 The identified need for affordable homes in West Berkshire, of 330 dwellings per annum, comprises approximately 64% of the overall identified housing need for the plan area, of 513 dwellings per annum. To deliver the number of affordable homes needed in West Berkshire, the Plan would be required to identify a housing supply of, at least, 825 dwellings per annum (assuming a policy requirement of 40% affordable housing provision is applied), which represents +160% of the LHN figure.
- 3.21 Given that the identified annual need for affordable housing provision comprises approximately 64% of the overall annual local housing need, there is a clear case for accommodating further residential development, as far as is reasonably practicable, within the District, to promote the delivery of greater affordable housing.
- 3.22 Furthermore, the Updated Housing Needs Evidence (2022)⁷ illustrates, at Table 4.15, that a significant proportion (approximately 46%) of the District's total affordable housing need is required within the North Wessex Downs AONB Spatial Area, comprising 152 dpa out of the overall total of 330 dpa.
- 3.23 ONS datasets⁸ confirm that the latest median housing affordability ratio (2021) for West Berkshire is 9.73⁹. This means that the median house prices in the District are almost 10 times that of median workplace-based earnings. This is up from a ratio of 5.1 in 2000 and 7.3 in 2010, which indicates that homes in West Berkshire have become markedly less affordable over time.

⁶ Available online at: https://www.westberks.gov.uk/media/49801/Updated-Housing-Needs-Evidence-July-2022/pdf/West_Berkshire_Housing_Needs_Assessment_Update_July_2022.pdf?m=638006715718270000.

⁷ *Ibid.*

⁸ Source: House Price Statistics for Small Areas and Annual Survey of Hours and Earnings, ONS.

⁹ Median housing affordability ratio refers to the ratio of median price paid for residential property to the median workplace-based gross annual earnings for full-time workers.

- 3.24 To support the long-term viability of the services and amenities of the District's Eastern Urban Area, such as Tilehurst and the other western suburbs of Reading, there is clearly a need to deliver new market and affordable homes in the area within the plan period. The area comprises the District's highest order settlement and as such represents the most sustainable location to accommodate new development in the District.
- 3.25 Given the principal mechanism for the delivery of affordable homes is through the allocation of market housing there is justification for adopting a higher housing requirement, we therefore encourage the Council to consider allocating the Land west of Little Heath Road, Reading, to assist in meeting the identified need for affordable housing in the District. Given a policy compliant mix of homes, the site is capable of delivering approximately 130 new much-needed affordable homes within the District.

Unmet Need Arising Outside of West Berkshire & the Duty-to-Cooperate

Unmet Need Arising Outside of West Berkshire

- 3.26 The Government's Standard Method calculation does not take account of unmet need arising from outside the authority's area. However, as noted within the emerging plan, West Berkshire District falls within the Western Berkshire Housing Market Area ('HMA'). Which also comprises Bracknell Forest, Reading Borough, and Wokingham Borough Councils administrative areas.
- 3.27 The Berkshire (including South Bucks) Strategic Housing Market Assessment ('SHMA') (2016)¹⁰, published as part of the Council's evidence base, affirms the strong functional relationships exhibited between these local authority areas - in relation to where people live and work. Recognising this, the Western Berkshire HMA authorities have sought to demonstrate a shared history of collaborative working in relation to housing matters and associated infrastructure, which included the preparation of a joint Statement of Common Ground ('SoCG') for the purposes of local plan-making.
- 3.28 Signed by each constituent authority in August 2021, the West of Berkshire Area SoCG¹¹ recognises that, in the first instance, each authority will seek to meet its own development needs in full. However, the SoCG acknowledges that there is a shortfall in planned residential development in Reading borough of 10 dpa throughout their plan period, equating to a total of 230 net new homes.

¹⁰ Available online at: https://www.westberks.gov.uk/media/40949/Berkshire-inc-South-Bucks-Strategic-Housing-Market-Assessment/pdf/Berks_SHMA_Feb_2016.pdf?m=638103405174070000.

¹¹ Available online at: https://www.westberks.gov.uk/media/53787/Duty-to-Cooperate-Statement-January-2023/pdf/LPR_Interim_DtC_Statement_January_2023.pdf?m=638086137283470000.

- 3.29 Consequently, the authorities have recognised that there is currently a modest identified and agreed-upon quantum of unmet need arising from within the Western Berkshire HMA. In seeking to address this unmet need, the SoCG recognises that this should, in principle, be met within the Western Berkshire area. Given the relatively modest level of unmet need, Darcliffe expect that an appropriate contribution should be accommodated within West Berkshire district toward meeting some, if not all, of Reading's unmet need.
- 3.30 The Bracknell Forest Local Plan has recently been subject to examination in public and has not included any additional supply to address the shortfall in Reading. As such, it falls to either Wokingham or West Berkshire to include it within their housing requirement.
- 3.31 Planning Practice Guidance ('PPG') states that "*Inspectors will expect to see that strategic policy making authorities have addressed key strategic matters through effective joint working, and not deferred them to subsequent plan updates...*". Darcliffe maintain therefore that simply pushing consideration of Reading's unmet need back to a subsequent plan update would be inconsistent with national policy and fails to adequately respond to the requirements under the duty to co-operate.
- 3.32 The emerging plan fails to provide any such clear commitment to meeting Reading's unmet need. The Housing Background Paper states that this exercise should be undertaken through the review of the local plan once Reading has clarified the extent of unmet need through its own local plan review.
- 3.33 RBC's unmet need is primarily due to its constrained administrative boundaries, which results in the lack of greenfield sites for development, and noting RBC is now subject to the 30% uplift to the minimum Standard Method OAN, and is substantively reliant on brownfield sites to meet housing needs. As evidenced by the unmet need of their adopted Local Plan, brownfield sites within RBC are diminishing.
- 3.34 Furthermore, the location of the developable sites is predominately central and lend themselves to flatted development. Consequently, RBC will likely be supplying a lack of family homes, alongside likely failing to meet its own OAN minimum needs, within the borough to meet local needs. This further promotes the need for Tilehurst, as a settlement which is located and essentially forms a functional suburb of Greater Reading, to pick up the unmet need for RBC's family homes.
- 3.35 It is also notable RBC's last recorded 5YHLS figure was 5.2 years in 2021, which is less than 2 years after their Local Plan was adopted. This downwards trajectory so early in the plan period clearly indicates their allocated sites are already not delivering at anticipated rates. This assumedly relates to the dependence on brownfield sites which are generally slower to deliver housing in comparison to greenfield sites. As a consequence of RBC's housing trajectory, the 230 home shortfall will likely increase in the next Local Plan Review.

- 3.36 To redress these concerns, Darcliffe recommends West Berks Council reconsider including a specified commitment toward meeting a least the existing identified unmet needs of Reading Borough within the District's housing requirement figure under Policy SP12. Furthermore, in meeting this specified amount of unmet need, Darcliffe recommends that the Council seeks to identify opportunities to deliver it within locations that are functionally linked to the area in which the unmet need arises.
- 3.37 Consequently, we encourage the council to (re)consider allocation of the Land west of Little Heath Road, Reading, which is capable of accommodating unmet need arising from Reading. The site is capable of meeting Reading's entire unmet need over the entire plan period with further capacity to meet additional need in West Berkshire. It is adjacent to the existing settlement of Reading, so is well-placed to provide for its unmet need in a location that is functionally connected to Reading.

The Duty-to-Cooperate ('the Duty')

- 3.38 Section 33a of the Planning and Compulsory Purchase Act (2004) ('PCPA') requires that local planning authorities should co-operate with other relevant local authorities, the County Council, and prescribed bodies (as relevant), in relation to the preparation of a Local Plan. The Duty requires the Council to engage constructively, actively, and on an on-going basis, in the preparation of the Plan, insofar as it relates to a strategic matter. Strategic Matters include the sustainable development and use of land that has, or would have, a significant impact on at least two planning areas, such as the amount and distribution of housing.
- 3.39 A fundamental requirement of a Local Plan is to meet the area's development needs as well as any needs that cannot be met within neighbouring areas unless there are policies in the Framework that protect areas or assets, or adverse impacts of doing so would significantly and demonstrably outweigh the benefits taken as a whole (NPPF, Paragraph 11). Indeed, Paragraph 35 of the NPPF notes that this is an express requirement of a sound Local Plan.
- 3.40 Furthermore, paragraph 24 of the NPPF is clear that LPAs have a duty to cooperate with each other and with other prescribed bodies, on strategic matters that cross administrative boundaries. The NPPF goes on to note that '*...joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere*'.
- 3.41 The NPPF is clear that the Duty is not simply a bureaucratic exercise but one which should ensure Local Plans are *effective* and *positively prepared*. As such, cooperation clearly relates to maximising the effectiveness of plan preparation.
- 3.42 Importantly, the requirement is to 'cooperate', rather than to just 'communicate', although it is accepted that the Duty to Cooperate is not *de facto* a duty to agree. There is however an expectation that neighbouring authorities will work together to collectively address strategic matters, including meeting housing need.

- 3.43 The Oxford English Dictionary ('OED') definition of *cooperate* is to 'work together to achieve something', whereas the OED definition of *communication* is to 'share or exchange information'. There is a fundamental difference between the two, with the emphasis in cooperation being to achieve something. Engagement alone is therefore insufficient to comply with the Duty.
- 3.44 From review of the signed statement of common ground it appears the HMA authorities have undertaken and satisfied a process of identifying material strategic planning matters. And there has been a process of communication considering the identified strategic matters. However, we do not consider the arrived at conclusion of not undertaking any action to remedy Reading Borough's unmet need until such time as a future plan review is undertaken satisfies the base expectation and requirement of co-operation. We are also concerned by the apparent lack of ongoing co-operation and engagement. These matters undermine confidence in the effectiveness of the process undertaken in context of the DtC.
- 3.45 Failure of WBDC to properly cooperate with neighbouring authorities and other bodies to meet development needs should therefore result in the emerging Plan being found unsound. It is essential that WBDC fully cooperates with other LPAs to meet Reading's identified unmet housing needs. To redress this issue, Darcliffe encourage the Council to consider the allocation of the Land west of Little Heath Road, Reading, to meet a specified proportion of the unmet need arising from Reading.

4. THE PLAN PERIOD

- 4.1 Paragraph 22 of the NPPF requires that '*...strategic policies should look ahead over a minimum 15 year period from adoption*'. The Council's proposed plan period runs to 2038/39, which would mean that the plan would need to be adopted in 2023/24 if it is to ensure a full 15 years from the point at which it is adopted. The Council's own Local Development Scheme ('LDS')¹² anticipates that the emerging plan is at best likely to be adopted in September 2024. Which would provide a plan period covering less than 15 years post adoption.
- 4.2 To redress this, Darcliffe recommends the plan-period should be extended by at least 12 months, ending in 2040. This would, in effect, increase the overall housing target by at least 513 dwellings, to cover the additional monitoring year. The council will also need to identify additional supply of new homes to address the plan's extended plan period.
- 4.3 Darcliffe recommends that the allocation of the Land west of Little Heath Road, Reading for approximately 322 dwellings could and would make a significant contribution to redressing this additional housing need through the plan period.

¹² Available online at: https://www.westberks.gov.uk/media/53425/Local-Development-Scheme-January-2023/pdf/Local_Development_Scheme_Jan_2023_clean.pdf?m=638097176540170000.

5. THE SPATIAL DISTRIBUTION OF HOUSING

- 5.1 The NPPF (2021) requires, at paragraph 20, strategic policies should set out an overall strategy for the pattern, scale, and design quality of places. Making sufficient provision for housing and other development needs. Darcliffe welcomes the Council's consideration of alternative options¹³ to develop an appropriate spatial strategy for West Berkshire up to 2039, as detailed within the Sustainability Appraisal that accompanies this iteration of the emerging local plan (SA).
- 5.2 The identified alternative spatial strategy options for the District each seek to direct development toward the most sustainable settlement locations within West Berkshire. Darcliffe **supports** the Council's recognised commitment to maximising development at the most sustainable locations in the District.
- 5.3 However, notwithstanding the direction of development toward the most sustainable settlements, each reasonable alternative spatial strategy option ultimately relies upon the allocation of land within all three Spatial Areas, including the North Wessex Downs AONB, to meet the District's overall housing needs.
- 5.4 As noted within the Housing Background Topic Paper (2023)¹⁴, the North Wessex Downs AONB Spatial Area covers 74% of West Berkshire. Given the various constraints associated with the Newbury and Thatcham Spatial Area (including environmental, flooding, and heritage constraints), and with the Eastern Area Spatial Area (including flooding constraints and the Detailed Emergency Planning Zone), the Council considers that it is not reasonably practicable to accommodate the entire housing need in these areas.
- 5.5 Despite the constraints in these two Spatial Areas, 92% of the residential allocations within the emerging local plan are located in the Newbury and Thatcham and Eastern Area Spatial Areas. Darcliffe generally **supports** the Council's proposed spatial strategy to the extent that development is clearly and appropriately intended to be directed toward the most sustainable locations.
- 5.6 However, Darcliffe contends that in the implementation of this spatial strategy, the Council have missed opportunities to allocate residential development at appropriate and sustainably located sites within the preferred spatial locations within the District. Darcliffe recommends the Council reconsider the omission of an allocation(s) for residential development at the Land west of Little Heath Road, Reading accordingly.

¹³ Available online at: <https://www.westberks.gov.uk/lpr-proposed-submission-consultation>.

¹⁴ Available online at: https://westberks.gov.uk/media/54001/Housing-Background-Paper-January-2023/pdf/Housing_Background_Paper_January_2023.pdf?m=638102336216470000.

- 5.7 Importantly, the site adjoins the highest order settlement within the District, and even within the HMA, being located immediately adjacent to the west of Reading. Furthermore, the site is located adjacent to the District's highest order Spatial Area - the Eastern Area Spatial Area. The site clearly therefore relates favourably regarding the Council's identified spatial strategy, which directs development toward the most sustainable locations.
- 5.8 As noted in the Updated Housing Needs Evidence (July 2022) paper, a number of settlements (including Aldermaston, Burghfield and Mortimer) in the southern extent of the Eastern Area are unable to contribute toward meeting local housing need owing to their location within the Atomic Weapons Establishment Detailed Emergency Planning Zone ('AWE DEPZ'). Consequently, this provides an impetus that the remaining settlements of the Eastern Area, such as Tilehurst, should and where appropriate can accommodate the surplus housing needs of this spatial area.
- 5.9 It is also relevant that the omission of the large strategic Grazeley Garden Settlement, allocation (c. 15,000 homes), was a consequence of the AWE DEPZ preventing housing deliverability in the east of the District. This further demonstrates that housing should be reallocated elsewhere within the Eastern Area to fulfil the voided supply of homes, as well as capitalise on the lost supply of potential resource associated with the large functional economic market area that is Reading.
- 5.10 The Settlement Hierarchy Study Paper, which forms part of the evidence base supporting the Local Plan Review, classifies Tilehurst and Purley-on-Thames as an 'Urban Area' which forms highest classification for sustainability. Proposed Policies SP1 and SP3 set out the Spatial Strategy for West Berks and states "*The scale of development proposals will be expected to be relative to the existing or proposed level of facilities and services in the settlement, together with their accessibility*".
- 5.11 Boyer has undertaken an assessment of the site against the Council's Sustainability Appraisal ('SA') methodology, which is set out in section 7 of these representations. The assessment demonstrates that the site scores positively in relation to the SA assessment framework. Given the clear positive score of the site against the Council's SA methodology, Darcliffe contends that the site's allocation could be achieved consistent with the Council's proposed spatial strategy.
- 5.12 Furthermore, the scale of development that is proposed for this site will assist with the District's housing delivery both in the short-term and over the life of the plan period. In conjunction with the strategic-scale site allocations the Council's identified housing trajectory relies upon, the development of sites at this medium scale can assist in significantly boosting the supply of housing across the plan period, and specifically within the early part of the plan period.

- 5.13 Paragraph 68 of the NPPF states that local authorities should promote a good mix of sites, with medium-scale sites often able to be built out relatively quickly. This is supported in research conducted by Lichfields¹⁵, which reports that schemes of 500 dwellings or more take on average between 5 to 8.4 years from the validation of an application for outline planning permission to the delivery of the first new home. The consequence being larger sites, such as the proposed strategic allocations, typically only substantively contribute to new housing delivery later on in the plan's lifespan.
- 5.14 For these reasons, Darcliffe recommends that the Council reconsiders the omission of the site from allocation for residential development prior to the submission of the plan for examination.

Development in the North Wessex Downs AONB Spatial Area

- 5.15 In seeking to identify sufficient development sites to meet the District's local housing needs, the Council has sought to accommodate a modest amount of new homes (approximately 8% of the overall need) within the North Wessex Downs AONB.
- 5.16 Paragraph 174 of the NPPF sets out that "*Planning policies and decisions should contribute to and enhance the natural and local environment by: [inter alia] protecting and enhancing valued landscapes*" such as the country's Areas of Outstanding Natural Beauty. Furthermore, the NPPF clarifies, at paragraph 176, that "*Great weight should be given to conserving and enhancing landscape and scenic beauty in [...] Areas of Outstanding Natural Beauty*".
- 5.17 Given the significant housing need within the District, as set out in the previous discussion, there is clearly a need to accommodate a modest amount of the District's much-needed residential development within the North Wessex Downs AONB Spatial Area. Therefore, although the Council has given great weight to conserving and enhancing the landscape and scenic beauty of the AONB, there is a clear and overriding need to accommodate a modest amount of growth within the Spatial Area if sustainable development is to be achieved.
- 5.18 Darcliffe generally **supports** the Council's proposed spatial strategy to this extent, in which a modest amount of new homes is proposed to accommodate growth within the North Wessex Downs AONB Spatial Area.
- 5.19 Furthermore, in determining appropriate locations to accommodate residential development within the North Wessex Downs AONB Spatial Area, the Council has sought to have due regard to the conservation and enhancement of the landscape and scenic beauty of the AONB, in accordance with Paragraph 176 of the NPPF.

¹⁵ Available online at: <https://lichfields.uk/content/insights/start-to-finish>.

- 5.20 The Council assessed parcels of land within the North Wessex Downs AONB Spatial Area through the Landscape Character Assessment ('LCA') and Landscape Sensitivity Assessment ('LSA') processes, which informed the Council's assessment of the potential suitability of sites for residential development. However, the Council did not assess Land west of Little Heath Road, Reading within the HELAA and therefore did not form a conclusion as to the suitability of the site for development.
- 5.21 Taking into account the LCA / LSA processes, the Council concluded that several parcels of land within the AONB could be appropriate to accommodate development, subject to various recommendations to maintain and enhance the landscape and scenic beauty of the AONB. Darcliffe has undertaken an assessment of Landscape Sensitivity for development at the site, and we set the results out in more detail in Section 6 and Appendix 2 of these representations.
- 5.22 In summary, Darcliffe considers the site would be capable of accommodating the proposed level of residential development whilst conserving and enhancing the broader landscape and scenic beauty of the AONB. This is aided by the site's generally flat topography and the belt of trees aligning the western extent of the site, which ensures the land is visually enclosed from the wider landscape of the AONB.
- 5.23 The Council's proposed site allocations within the North Wessex Downs AONB represent locations where development can best be situated within the landform, or best relate to the existing built form, or are enclosed by substantive established native deciduous tree cover, of value in its own right. As such, Darcliffe considers the allocation of Land west of Little Heath Road, Reading, could be undertaken consistent with the Council's existing and proposed spatial strategy ensuring that the special qualities of the AONB as a whole can be appropriately conserved and enhanced.
- 5.24 With regard to the Land west of Little Heath Road, Reading, the West Reading LSA (2009) assessed the broad area in which the site is situated as part of Parcel 13E 'Little Heath Gravel Plateau'. The LSA concludes that the area demonstrates *low to medium landscape sensitivity* and is characterised by:
- Scattered mixed development broken up by small open areas,
 - Good level of visual enclosure, and
 - Mostly low to medium historic landscape sensitivity.
- 5.25 Darcliffe is committed to bringing forward development on the site in accordance with the principal objective of conserving and enhancing the character of the AONB. Further detail is provided in section 6 and Appendix 2 of these representations. However, in principle, Darcliffe contends that the site is capable of delivering the proposed quantum of residential development, adjoining the most sustainable settlement within the District, whilst conserving and enhancing the special qualities of the North Wessex Downs AONB.

6. LAND WEST OF LITTLE HEATH ROAD, TILEHURST

The Opportunity

- 6.1 The site comprises approximately 13.5ha of land providing the opportunity to deliver approximately 322 much needed new homes. A Site Location Plan is provided at **Appendix 1**.
- 6.2 Development of the site will provide a mix of housing in line with national and local policy. A range of house types, sizes and tenures are envisaged in order to maximise the effective and efficient use of the site and to meet the accommodation needs of a variety of household types.
- 6.3 The site has not previously been promoted in the current LPR and therefore does not feature in the 2023 HELAA. However, the site is sustainably located in terms of access to local facilities, amenities and public transportation links to the centre of Reading. The site would also represent a logical extension to the western boundary of the built-up area of Tilehurst, up to Sulham Woods.
- 6.4 A detailed assessment of the site's deliverability is set out in **Appendix 2**. However, to summarise, the site itself is largely unconstrained and forms mostly developable land. Vehicular access points are available multiple locations along Little Heath Road. Furthermore, there is ample space to mitigate impacts and work around the Tree Preservations Orders ('TPO's'), Root Protection Areas ('RPA's'), Ancient Woodland and Local Wildlife Areas to the west of the site, through the means of green and blue infrastructure.
- 6.5 The main constraint to overcome would be the impacts on the North Wessex Downs AONB and local landscape sensitivity. **Appendix 2** provides a detailed assessment of the site's suitability in relation to the AONB.
- 6.6 Darcliffe is acting as agent for the Sulham Estate whilst an imminent option agreement between the two parties is agreed. Darcliffe and the Sulham Estate have a proven record of promoting land in Tilehurst as exemplified by Stonehams Farm (refs. EUA003 and EUA008) allocation in the HSA DPD (2017).
- 6.7 Furthermore, there are no known legal restrictions to the development of the site for the proposed use. The site is therefore considered to be available for residential development within the plan period (within the next 1 – 5 years), in accordance with PPG.

7. SUSTAINABILITY APPRAISAL (SA) / STRATEGIC ENVIRONMENTAL ASSESSMENT (SEA)

- 7.1 The Council's Sustainability Appraisal ('SA') / Strategic Environmental Assessment ('SEA')¹⁶ forms a core part of the evidence base underpinning the Local Plan.
- 7.2 The LPR has identified a number of new residential site options following the Housing and Economic Land Availability Assessment ('HELAA'), which rejected a number of sites that the council deems to be unsuitable based on the available evidence at the time.
- 7.3 At Appendix 8b, the Council's SA/SEA makes an assessment of each of the new residential site options which are identified not to be unsuitable.
- 7.4 Given that Land west of Little Heath Road was not assessed in the HELAA and therefore not the SA/SEA either, the assessment is replicated (below) at Table 1, where an equivalent assessment is made by Darcliffe Homes.
- 7.5 The scoring system also replicates that used in the SA/SEA, as follows:

| | | | | |
|--|-----------------------------------|---------|---|--|
| ++ | + | 0 | - | -- |
| Strongly support sustainability objectives | Support sustainability objectives | Neutral | Works against sustainability objectives | Works strongly against sustainability objectives |

¹⁶ Available online at: <https://www.westberks.gov.uk/lpr-proposed-submission-consultation>.

Table 1 – Appraisal of Land west of Little Heath Road

| SA Objective | SA Sub-Objective | Effects of Policy on SA Objectives | Justification for Assessment | Mitigation / Enhancement | Comment |
|---|--|------------------------------------|--|---|--|
| 9: To reduce emissions contributing to climate change and ensure adaptation measures are in place to respond to climate change. | 9(a): To reduce West Berkshire's contribution to greenhouse gas emissions | 0 | Allocation of the site would require the proposal to meet 'Future Homes Standards', meaning the development would be 'Net Zero Ready' once the grid can accommodate such standards. | | The development would have a neutral impact on greenhouse gas emissions, through mitigation. |
| | 9(b): To sustainably manage flood risk to people, property and the environment | 0/+ | The site is within Flood Zone 1 (lowest risk). A Flood Risk Assessment and necessary mitigation measures to be provided. | Provision of multi-functional Sustainable Drainage Systems that also benefit ecology and landscaping. | The development would have a neutral impact on flood risk, through mitigation, whilst enhancing landscape features and local ecology. |
| 1: To enable provision of housing to meet identified need in sustainable locations | 1(a): To maximise the provision of affordable housing to meet identified need | + | The development would have a positive impact on the provision of affordable housing as it is of a scale to provide affordable housing in line with the draft policy requirement of 40% for greenfield sites. | | The development would have a positive impact on social sustainability due to the provision of additional housing and affordable homes to meet local needs. |

| SA Objective | SA Sub-Objective | Effects of Policy on SA Objectives | Justification for Assessment | Mitigation / Enhancement | Comment |
|--|---|------------------------------------|---|--------------------------|---|
| | 1(b): To enable provision of housing to meet all sectors of the community, including those with specialist requirements | + | The development would have a positive impact on provision of a range of housing tenures and sizes in line with emerging policy requirements. Proposed homes would also meet accessibility standards in line with current building regulations. | | The development would have a positive impact on social sustainability due to the provision ranging tenure, sized and accessible housing types to meet local needs. |
| 2: To improve health, safety and wellbeing and reduce inequalities | 2(a): To support healthy, active lifestyles | 0/+ | The site is in a sustainable location for future residents and development will contribute towards local services/ infrastructure through CIL and S106 contributions. An allocation policy for the provision of on-site public open space and play areas would be required. Pedestrian and cycle facilities within the site would be provided and increase opportunities for active travel. | | The development would have a positive impact on social and environmental sustainability through the provision of walking and cycling routes, good design, provision of green infrastructure and off-site contributions. |

| SA Objective | SA Sub-Objective | Effects of Policy on SA Objectives | Justification for Assessment | Mitigation / Enhancement | Comment |
|---|---|------------------------------------|--|---|---|
| | 2(b): To reduce levels and fear of crime and anti-social behaviour | + | Good design required by policy should ensure levels and fear of crime and anti-social behaviour are minimised. Darcliffe are committed to meeting guidance set out in 'Designing out Crime' standards. | | |
| | 2(c): To enable the protection and enhancement of high quality multifunctional GI across the District | + | An allocation policy would make reference to a minimum GI requirement. | Policies in the plan requires GI to be considered, therefore, the overall impact would be positive. | |
| 3: To improve accessibility to community infrastructure | 3(a): To improve access to education, health and other services | 0 | The development would not directly impact on access to community facilities. However, the site is located in a sustainable location and CIL/S106 contributions would benefit these services. | | An allocation policy is likely to have a neutral impact on all elements of sustainability. Other policies in the plan will result in a positive impact on social sustainability in relation to provision of IT facilities |
| | 3(b): To support the development of access to IT facilities including Broadband particularly in rural locations | 0 | The development would not impact on access to IT facilities. | Full access to Fibre is required in Building Regulations. | |
| 4: To promote and maximise opportunities for all forms of safe and sustainable travel. | 4(a): To reduce accidents and improve safety | + | An allocation policy would specify access arrangements to ensure safe entry/exit from the site. | | The development, in combination with other policies will have a |

| SA Objective | SA Sub-Objective | Effects of Policy on SA Objectives | Justification for Assessment | Mitigation / Enhancement | Comment |
|--|---|------------------------------------|---|---|--|
| | 4(b): To increase opportunities for walking, cycling and use of public transport | 0/+ | The development would incorporate and improve the PRoW's which runs along the norther boundary and through the centre of the site. The development would also improve linkages of Tilehurst to Harefield Copse and Pinks Grove/Beals Copse. | | positive impact on economic and social sustainability through ensuring safe access and opportunities for walking, cycling and public transport. |
| 5: Ensure that the character and distinctiveness of the natural, built and historic environment is conserved and enhanced. | 5(a): To conserve and enhance the biodiversity and geodiversity of West Berkshire | + | The development would require consideration of biodiversity through survey work, appropriate avoidance and mitigation measures. The Government has proposed to introduce a requirement for a minimum of +10% Biodiversity Net Gain. Therefore, there will be a positive gain. | Other policies in the plan require consideration of biodiversity (net gain) and geodiversity. | The development would have a positive impact on environmental sustainability. Other policies in the plan would result in a positive impact if delivered. |
| | 5(b): To conserve and enhance the character of the landscape | 0 | The development would require consideration of the landscape, with appropriate mitigation sensitive design to be considered to ensure a positive impact. | Other policies in the plan also require consideration of the landscape. | |

| SA Objective | SA Sub-Objective | Effects of Policy on SA Objectives | Justification for Assessment | Mitigation / Enhancement | Comment |
|--|--|------------------------------------|--|---|--|
| | 5(c): To protect or, conserve and enhance the built and historic environment to include sustaining the significant interest of heritage assets | 0 | The allocation policy would require an archaeological desk based assessment, field evaluation and heritage assessment, to mitigate impacts on the historic environment, as necessary. However, the only heritage asset located within close proximity to the site, Kiln Cottage, is naturally well screened. | Other policies in the plan requires consideration of heritage and archaeology. | |
| 6: To protect and improve air, water and soil quality, and minimise noise levels throughout West Berkshire. | 6(a): To reduce air pollution | 0 | The allocation policy would require an air quality survey and necessary mitigation measures to be provided. | Other policies in the plan would ensure that air quality is fully considered. | The development is likely to have a mostly neutral impact on environmental sustainability as a result of the other plan policy requirement to consider air, water, soil and noise. |
| | 6(b): To manage noise levels | 0 | The development would be unlikely to impact on noise levels. | Other policies in the plan would ensure that noise levels are fully considered. | |
| | 6(c): To maintain and improve soil quality | 0 | The development would be unlikely to impact on soil quality. | | |
| | 6(d): To maintain and improve water quality | + | The allocation policy would require consideration of water supply and drainage which should at least maintain if not improve water quality. | | |

| SA Objective | SA Sub-Objective | Effects of Policy on SA Objectives | Justification for Assessment | Mitigation / Enhancement | Comment |
|--|--|------------------------------------|---|--------------------------|---|
| 7: To promote and improve the efficiency of land use. | 7(a): To maximise the use of previously developed land and buildings where appropriate | 0 | The development would not impact on the use of PDL. | | The development is likely to have a positive impact on social sustainability by making the best and most efficient use of the site. |
| | 7(b): To apply sustainable densities of land use appropriate to location and setting. | + | The allocation policy would set an appropriately ranged dwelling per hectare requirement. | | |
| 8: To reduce consumption and waste of natural resources and manage their use efficiently. | 8(a): To reduce energy use and promote the development and use of sustainable /renewable energy technologies, generation and storage | + | The allocation policy would require that efficient use of sustainable technologies, resources, materials and solar gain are proposed. | | The site is likely to have a neutral impact on environmental and economic sustainability through the promotion of renewable technologies. |
| | 8(b): To reduce waste generation and disposal in line with the waste hierarchy and reuse of materials | 0 | The development itself is unlikely to impact on waste generation beyond standard policy requirements. | | |
| | 8(c): To reduce water consumption and promote reuse | + | An allocation policy would require consideration of water supply and drainage which could give scope to reducing water consumption and opportunities for reuse. | | |
| | 8(d): To reduce the consumption of minerals and promote reuse of secondary materials | ? | The allocation policy would include a requirement for the consideration of mineral safeguarding as the site is within an MSA. | | |

| SA Objective | SA Sub-Objective | Effects of Policy on SA Objectives | Justification for Assessment | Mitigation / Enhancement | Comment |
|--|---|------------------------------------|---|--------------------------|--|
| 10: To support a strong, diverse and sustainable | 10(a): To encourage a range of employment opportunities that meet the needs of the District | 0 | The policy is unlikely to impact on employment opportunities. | | The site is likely to have a neutral impact on economic sustainability as it does not deliver economic development. However, the provision of new homes will help to support the economy in an indirect way. |
| | 10(b): To support key sectors and utilise employment land effectively and efficiently | 0 | The policy is unlikely to impact on employment land. | | |
| | 10(c): To support the viability and vitality of town and village centres | 0 | The policy will not directly impact on the introduction of a new community to the area will support the longer-term the viability and vitality of nearby town and village centres. | | |
| Overall Effect: | Likelihood: | Scale: | Duration: | Timing: | |
| Neutral to Positive | High | Local (Tilehurst) | Permanent | Long Term | |

7.6 To summarise, the development site would likely have an overall neutral to positive impact on sustainability. Positive impacts have been identified in relation to all types of sustainability. Social sustainability as the site seeks to set out the requirements for a ranging typology of new houses on the site (of which 40% would be affordable), as well as requirements for good access routes to local services and facilities. Impacts on environmental sustainability are likely to be positive as a potential policy would set out the measures required to protect and enhance biodiversity and provide development that is conscious of climate change impacts. Economic sustainability would benefit from new development in a sustainable location where there is good access to services and facilities including employment opportunities. No negative sustainability impacts have been identified.

8. DEVELOPMENT MANAGEMENT POLICIES

- 8.1 The comments set out in this section are intended to assist the Council in developing an approach that is consistent with national planning policies and the tests of soundness. Where possible, suggested amendments have been set out in the response.
- 8.2 Darcliff broadly supports the objectives of the West Berkshire Local Plan Review (2022 - 2039) but advises that the Council reconsider the omission of an allocation for residential development at Land west of Little Heath Road, Reading, for approximately 322 dwellings, to ensure that the plan can be found *sound* at the Examination in Public.
- 8.3 The comments set out below are intended to identify opportunities to improve the effectiveness of the proposed policies. Darcliff's overriding recommendation comprises the inclusion of a new site allocation for approximately 322 additional dwellings at the Land west of Little Heath Road, Reading. The various benefits of including such an allocation are set out in sections 6, 7 and Appendix 2 of these representations.
- 8.4 As a general principle, the plan would benefit from consistent numbering, in relation to the paragraphs, policy criteria, and sub-criteria. This would assist the accessibility and the useability of the draft plan, improving the effectiveness of the document substantially.

Policy SP2: North Wessex Downs AONB

- 8.5 Darcliff supports draft Policy SP2 insofar as it recognises that the North Wessex Downs Area of Outstanding Natural Beauty (AONB) will have appropriate and sustainable growth that conserves and enhances its special landscape qualities.
- 8.6 However, to improve the effectiveness of the policy, it is recommended that the draft policy should explicitly set out that the principle of development is considered to be acceptable for the sites that are allocated within the North Wessex Downs AONB Spatial Area. This would avoid the subsequent need for each individual planning application to demonstrate that there are exceptional circumstances to make the development acceptable.
- 8.7 The Local Plan has already established that there are indeed exceptional circumstances to support development within the North Wessex Downs AONB Spatial Area, which ensure that such modest growth is within the public interest to come forward. Acknowledging that the allocated sites are acceptable, in principle, in this regard will avoid potential complications and delays further along in the planning process.
- 8.8 As such, the following criteria is recommended to be included:

- i) Sites within the North Wessex Downs AONB that are allocated for development within the West Berkshire Local Plan Review (2022 – 2039) are acceptable for development in principle and will be supported provided that they conserve and enhance the special landscape qualities of the AONB.

Policy SP7: Design Quality

8.9 Reference within this policy to 'relevant community planning documents' is problematic, as the phrase is not considered to relate to any specific identified set of considerations. It is recommended that the second paragraph of this policy is amended in accordance with the below:

- i) Development proposals will be expected to show how they have responded positively to both national and local design guidance. At a national level this includes the characteristics of a well-designed place as set out in the National Design Guide (2021), or as superseded, and at a local level, this includes neighbourhood plans and relevant material considerations community planning documents that identify the local character and distinctiveness of an area which is valued by local communities.

Policy SP8: Landscape Character

8.10 As currently formulated, the policy requires that all development, of any scale, would need to be supported by an appropriate landscape assessment. This is considered to be unduly burdensome on minor forms of development and may not be appropriate in all cases where major development is proposed. To introduce greater flexibility within the policy and avoid unnecessary delays further in the planning process, the following amendments are recommended:

- i) Where appropriate, Proposals for development major should be accompanied by an appropriate landscape assessment carried out in accordance with the current guidance from the Landscape Institute and Institute of Environmental Management & Assessment.

Policy SP10: Green Infrastructure

8.11 To avoid introducing potential delays in the planning process, it is recommended that additional clarification is necessary to support the final paragraph of this policy, in accordance with the below:

- i) Proposals involving the loss of green or blue spaces and other natural features will not be supported unless there is no longer a need for the existing infrastructure or an alternative is provided to meet the local needs that is both accessible and of equal or greater quality and benefit to the community at the time of the determination of any planning application (with the exception of Reserved Matters where details of appropriate green infrastructure provision may be fixed as part of the outline planning permission).

Policy SP11: Biodiversity and Geodiversity

8.12 To future-proof the policy, it is recommended that additional wording is included to provide for greater flexibility in the use of an appropriate metric to measure Biodiversity Net Gains which is not specifically the current metric developed by Natural England:

- i) All proposals should demonstrate a minimum biodiversity net gain of 10% via a Biodiversity Net Gain Plan using ~~the most up-to-date an appropriate~~ biodiversity accounting metric, either developed by Natural England or an agreed alternative, and provide details of the long-term maintenance and management of the net gain. This should be delivered on site in the first instance, or through biodiversity off setting where appropriate.

Policy SP12: Approach to Housing

8.13 In accordance with the discussion set out previously, Darcliffe recommends that the housing requirement is clearly expressed as a single value, which includes at least a 10% buffer over the Local Housing Need figure. Furthermore, Darcliffe recommends that Policy SP12 is amended to clarify a specific contribution to meeting the identified unmet need arising from Reading.

- i) Provision will be made for ~~8,721 to 9,146~~ 9,588 net additional homes in West Berkshire for the period 1 April 2022 to 31 March 2039; ~~513 to 538~~ 564 dwellings per annum. The target figure of ~~538~~ 564 dwellings per annum does not constitute a ceiling or cap to development. The target includes the provision of 230 dwellings toward meeting the unmet need arising from Reading borough, which is to be accommodated as close to the Eastern Urban Area as possible.

8.14 Furthermore, as currently formulated, the proposed policy limits the exception to the net loss of residential units (i.e., where there is a reasoned justification in the form of a benefit to the wider community) to situations in which there is a change of use.

8.15 There are situations in which the public benefit of a net loss of residential units could be justified without a change of use occurring; for example, where an outdated apartment building is to be demolished and replaced to provide improved accommodation (e.g., larger units which meet Nationally Described Space Standards and address current housing needs). As such, the following amendment to the policy is recommended:

- i) There should be no net losses from the existing stock of homes in West Berkshire. Existing homes should be retained in residential use (or replaced at least in equal numbers, normally on the proposed site), unless there is a reasoned justification in the form of a benefit to the wider community ~~for a change of use~~. Developments should utilise opportunities to make better use of the existing housing stock.

Policy SP15: Sites allocated for residential development in North Wessex Downs AONB

8.16 To ensure consistency within the document, it is recommended that additional wording is included within Policy SP15 to confirm that the identified capacity for each allocated site represents an approximate capacity and not a cap, as set out in Policy SP12:

i) Development in the North Wessex Downs ~~AONB is will be~~ allocated for the approximate number of homes as follows: [...]

8.17 Furthermore, Darcliffe recommends the inclusion of an allocation for residential development at Land west of Little Heath Road, Reading, under a new policy ‘RSA24’.

| LPR Policy | Current Policy Ref | Site name | Approx no's |
|---------------|--------------------|--|-------------|
| [...] | [...] | [...] | [...] |
| <u>RSA 24</u> | | <u>Land west of Little Heath Road, Reading</u> | <u>322</u> |

Policy SP18: Housing Type and Mix

8.18 Delivery of dwellings to M4(3) standard may not be reasonably practicable in all cases. To provide for greater flexibility to examine planning applications on a case-by-case basis, thereby improving the effectiveness of the policy, the following amendments are recommended:

i) Around 10% of the new market housing and a maximum of 5 units of the affordable ~~sector~~ homes delivered on-site should also meet the wheelchair accessible standard M4(3) wheelchair user dwellings unless evidence clearly demonstrates that this would make the scheme unviable or would be unfeasible to deliver.

Policy SP24: Infrastructure and Delivery

8.19 To improve the effectiveness of the policy and to avoid potential unnecessary delays in the planning process, reference should be made within the policy to the need for any contributions required to the delivery of relevant infrastructure to be consistent with the tests at Section 122 of the Community Infrastructure Levy Regulations (2010) (as amended).

Policy DM40: Public Open Space

8.20 Paragraph 12.87 of the supporting text to Policy DM40 provides that “Public open space should be genuinely available in perpetuity to the public at large. The Council will normally seek the transfer of public open space areas into local authority ownership/control in a condition appropriate for such use, and together with a reasonable sum for their ongoing maintenance”.

8.21 Darcliffe supports the Council in seeking to ensure that public open space is genuinely available in perpetuity to the public at large. However, it would not be practical or desirable for the Council to take transfer of all areas of public open space (particularly where these areas are smaller in scale) and in certain circumstances it may be preferable that these are not transferred.

8.22 Accordingly, we would propose that the supporting text is revised to make more explicit allowance for such circumstances e.g. "However, it is recognised that in some instances it may not be practical or desirable for the public open space to be transferred and these situations will be assessed on a case by case basis".

Policy DM44: Parking

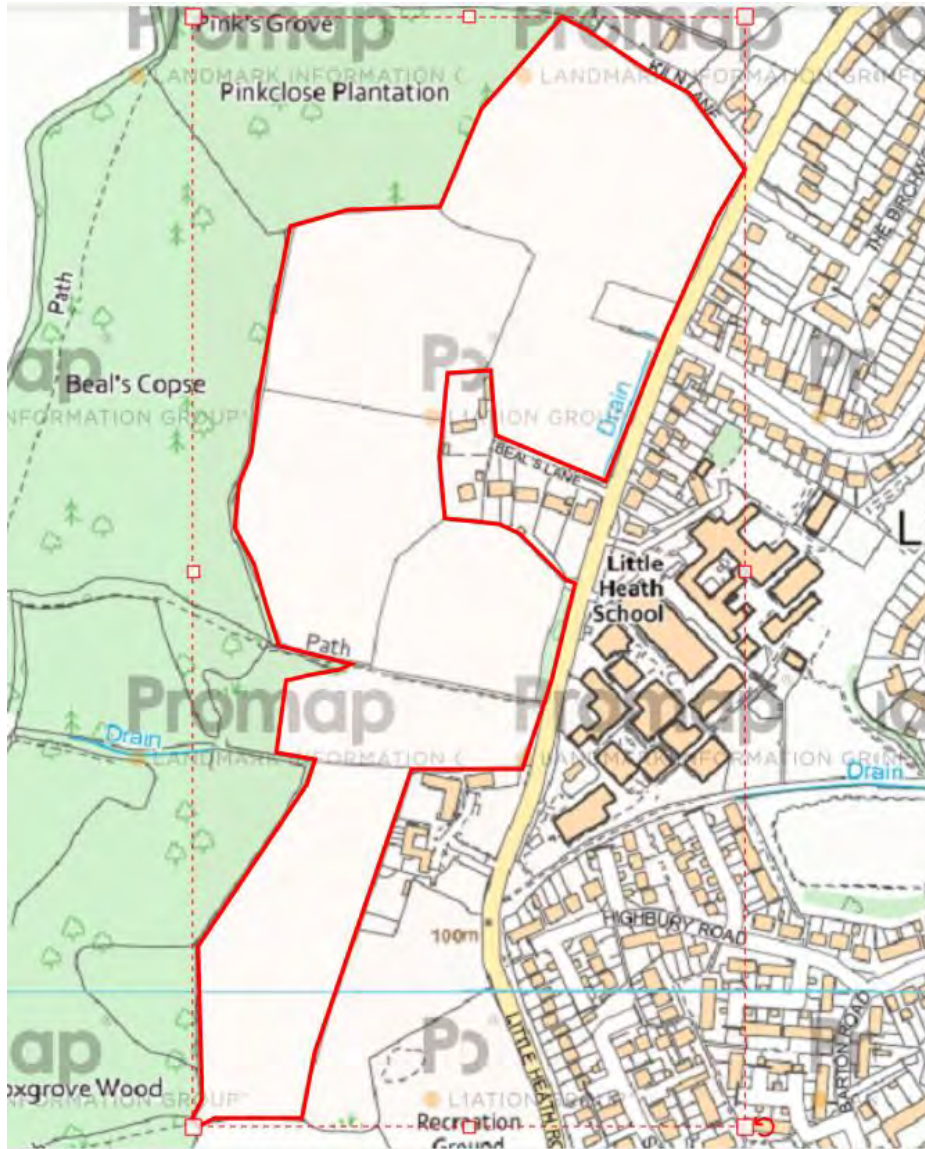
8.23 To ensure that the policy remains effective over the length of the plan period, it is recommended that additional wording is included to clarify that development proposals would be required to meet the most up to date standards where relevant:

- i) Cycle and motorcycle parking should be provided in accordance with the Council's 'Cycling and Motorcycling Advice and Standards for New Development', or such other standards as may be prepared. This sets out design standards and expected levels of provision for different types of development.

9. CONCLUSION

- 9.1 The Proposed Submission West Berkshire Local Plan Review (2022 – 2039) sets out how West Berkshire District Council proposes to, as a minimum, meet identified development needs within the district area. The proposed spatial strategy seeks to direct development toward the most sustainable locations within the district, whilst recognising the vital role that modest growth within the North Wessex Downs Area of Outstanding Natural Beauty provides to the longer-term viability of those settlement locations contained within it.
- 9.2 To this extent, Darcliffe **supports** the Council's principal objectives; which include meeting the district's local housing needs in full, and directing required development toward the most sustainable locations within the district. However, Darcliffe has concerns in relation to certain aspects of the plan, which we encourage the Council to consider amending prior to submission for examination in public. These include; increasing the level of headroom provided in the identified housing requirement, allocating a specified amount of development to accommodate unmet need arising in Reading, and updating the proposed plan period to include an additional year.
- 9.3 In meeting the district's identified housing needs, Darcliffe recommends the Council reconsider the omission of an allocation for residential development at the Land west of Little Heath Road, Reading. Darcliffe considers that the site could accommodate approximately 322 new dwellings, providing a policy-compliant development in one of the most sustainable locations in the district.
- 9.4 The site comprises a highly sustainable location, with strong functional links to Reading. As such, the site is well-positioned to effectively meet a significant proportion, if not all, of the identified unmet need arising from Reading. Furthermore, the development of the site would provide a significant contribution to ensuring that West Berkshire's identified housing needs can be met, including the provision of approximately 120 much-needed affordable homes (assuming a contribution of 40% in line with emerging Policy SP19).
- 9.5 There are no significant constraints to the development of the site for approximately 322 new homes, which Darcliffe is committed to bringing forward as part of a high-quality, well-designed scheme that conserves and enhances the special qualities of the North Wessex Downs AONB through sensitive design. The site is located within practical walking and cycling distance from the services and amenities within Tilehurst, and is well-connected to the main settlement of Reading, which provides further linkages to London and other key settlements.
- 9.6 Darcliffe is able to confirm that the site is *available* for development now, represents a *suitable* location for development, and that development of the site is *achievable* with a realistic prospect that housing can be delivered within the first five years of the draft plan period. The site is deliverable and should therefore be favourably regarded in relation to its potential allocation for residential development within the emerging West Berkshire Local Plan.
- 9.7 We look forward to continuing to work with West Berkshire District Council, Tilehurst Parish Council, and the wider community to provide much-needed new housing in this community.

APPENDIX 1 – SITE LOCATION PLAN



APPENDIX 2 – DETAILED ASSESSMENT OF SITE DELIVERABILITY

The Site

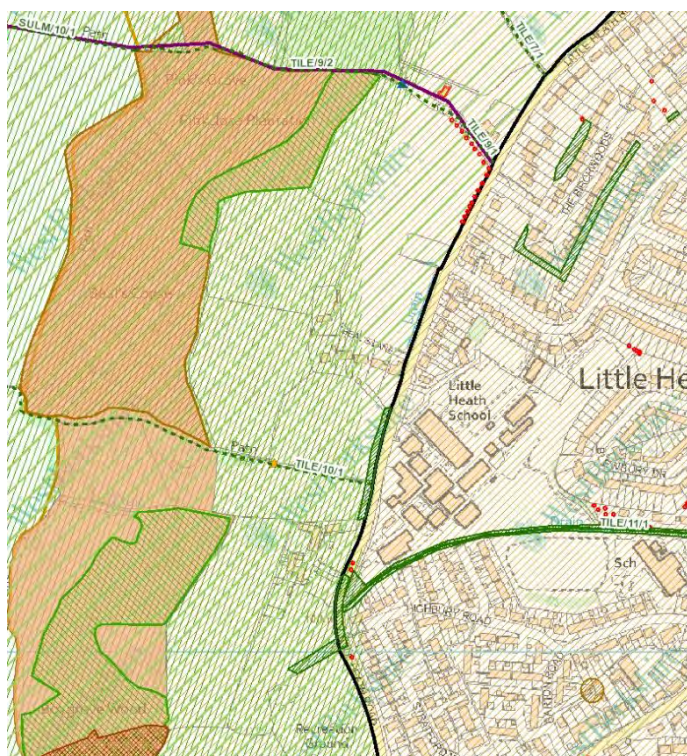
- 9.8 At approximately 13.5ha, the site comprises several agricultural fields which are used for grazing. The land gently undulates and gradually slopes down northwards. The fields are subdivided by a mix of wire fencing and mature trees.
- 9.9 The site is bordered by Little Heath Road running along the east, 150m of dense woodland to the west, a residential drive (Kiln Lane) to the north and Little Heath Park to the south. Seven large predominantly detached houses cut into the centre of the site, along Beal's Lane, which links off Little Heath Road. Several dwellings border the eastern side of the southern-most field. Little Heath Road marks the Tilehurst settlement boundary comprising a large built-up residential area of suburban houses.
- 9.10 The entirety of the site is generally well contained by mature trees and hedgerows running along the borders. However, the far north-eastern stretch is visible along Little Heath Road.
- 9.11 Existing vehicular access to the site is available in three locations. One off of Kiln Lane, to the north of the site. The other two off of Little Heath Road, towards the south of the site.
- 9.12 The site is sustainably located with the following local services/facilities located within close proximity:
- 33 Royal Blue bus route is located along Little Heath Road and runs 7 days a week, from 6am to midnight Monday-Saturday, every 20 mins. Sundays have a slightly reduced service. The service links to Reading town centre and the main train station.
 - Reading Train Station is served by the Transport for London, South Western, Cross Country and Great Western trains which links the town very well to all local towns which benefit from a rail network, as well as town and cities further away. The fast train to London takes 25 minutes.
 - Tilehurst Train Station at 2.5km (linking to Reading and Newbury) (all distances measured in this document are at a straight line).
 - 2 Pre Schools within 500m.
 - 3 Primary Schools within 500m.
 - Little Heath Secondary School located opposite the site.
 - A recreational park with a football pitch, playground, cricket pitch and skatepark within a 1-minute walk.
 - Convenience store, takeaways and post office within 650m.
 - A number of additional services including a pharmacy, sports centre and retail units within 1km or short bus journey/drive.
- 9.13 There is no relevant on-site planning application(s) history.

Policy Designations

- The entirety of the site is located within the North Wessex Down AONB.
- The site is located within the countryside, adjacent to the settlement boundary of Tilehurst.
- A Tree Preservation Order (TPO) strip runs along the west of Little Heath Road from Beal's Lane to Broxgrove House and Little Heath Court.
- 18 individual TPO's line the north eastern corner of the site at Little Heath Road and Kiln Lane.
- 2 Public Rights of Way (PROW) run through the site along Kiln Lane (TILE/09/1) and off Little Heath Road (TILE/10/1), just to the north of Broxgrove House.
- Kiln Cottage is a Grade II listed building located at the end of Kiln Lane, to the north of the site. It is well screened from the site by mature trees.
- The site is not located near a conservation area or locally listed heritage assets.
- The entire site is listed as a 'Biodiversity Opportunity Area'.
- The site is located within a minerals safeguarding area.
- The entire woodland to the west forms a non-statutory local wildlife site made up of Lowland mixed deciduous woodland.
- The southern and northern land parcels of land are bordered to the west by Ancient & Semi-Natural Woodland known as Harefield Copse (southern) and Pinks Grove/Beals Copse (northern). The central parcels to the west of Beal's Lane are bordered to the west by ancient replanted woodland known as Pinks Grove/Beals Copse. None of the woodland areas have TPO's.
- The entire site is located in watercourse flood zone 1 (lowest risk of flooding). There is a small area high risk surface water flooding at the south east of the site (next to Broxgrove House) and a small area of low risk surface water flooding to the north of Beal's Lane.
- The site is located within the Tilehurst Neighbourhood Plan Area.

9.14 A number of the policy designations are set out in the current adopted policies map, below:

Figure 1 – Adopted Policies Map



Key:

- Biodiversity Opportunity Area
- Public Right of Way (PROW)
- PROW Improvement Plan
- TPO
- TPO Strip
- Ancient Semi-Natural Woodland
- Ancient Replanted Woodland
- Settlement Boundary
- AONB
- Local Wildlife Site
- HSA DPD
- Neighbourhood Area Designated
- Grade II Listed Building

9.15 As part of the current Regulation 19 LPR, WBDC have prepared a draft Policies Map. All the currently adopted designations remain in place at the site. However, new designations include that the site is located within the AWE Aldermaston 12KM Planning Consultation Zone (PCZ), AWE Aldermaston Outline Planning Zone (OPZ) and AWE Burghfield OPZ.

Development Potential

9.16 With consideration given to the onsite constraints and under the assumption that the entire site is allocated for development, the Net Developable Area of the site is likely to be approximately 9.2ha. Draft Policy SP1 assumes developments in Tilehurst will be developed at 35 dwellings per hectare. As such, approximately 322 homes could be accommodated on site (including 40% affordable homes) incorporating open space, SuDS, landscaping, biodiversity enhancements, multiple vehicular access points, pedestrian and cycle links, and associated infrastructure.

9.17 It is also notable that any planning permission would benefit the local area through S106 funding and CIL contributions which will help fund community facilities and infrastructure.

9.18 Further social benefits would include a significant increase in residents who would support existing local community facilities in Tilehurst including local public houses, retail units and community groups. The development would also improve pedestrian access to Sulham Woods.

- 9.19 Environmental benefits would comprise provision for new landscape planting which would include a number of measures intended to generate new habitats and promote biodiversity at the site. Such measures would be integrated within a holistic scheme of public open space, and multifunctional SuDS and Green Infrastructure.
- 9.20 In addition, the development would also propose to meet Future Homes standards, which go beyond those required by Building Regulations and current WBDC policy. In this respect, the proposals would positively contribute towards climate change through reduce carbon emissions.
- 9.21 Economically, future residents living at the potential 322 new homes (through local expenditure) would help to support the existing services in Tilehurst such as local public houses, retail units, community groups, the viability of the 33 bus service and schools.

Deliverability of the Proposed Development

- 9.22 The Housing and Economic Land Availability Assessment ('HELAA') (2023) made an assessment of all the sites submitted in the ongoing 'Call for Sites'. The HELAA site assessment proformas consider promoted sites in relation to their 'suitability', 'availability' and 'deliverability' for residential development within the proposed emerging plan period. Land west of Little Heath Road was not submitted in the Call for Sites. However, below is an evaluation on each of the topics.

Availability

- 9.23 As an established local housebuilder, Darcliffe is acting as agent for the Sulham Estate whilst an imminent option agreement between the two parties is agreed. Darcliffe and the Sulham Estate have a proven record of promoting land in Tilehurst as exemplified by Stonehams Farm (refs. EUA003 and EUA008) allocation in the HSA DPD (2017).
- 9.24 Furthermore, there are no known legal restrictions to the development of the site for the proposed use. The site is therefore considered to be available for residential development within the plan period (within the next 1 – 5 years), in accordance with PPG.

Suitability

- 9.25 In accordance with PPG, a site can be considered to be suitable if it would provide an appropriate location for development when considered against relevant constraints and their potential to be mitigated. Darcliffe considers that there are no absolute constraints to the development of this site within the proposed plan period.
- 9.26 Overall, it is clear that the site is sustainably located in terms of access to local facilities, amenities and public transportation links to the centre of Reading. The site would also represent a logical extension to the western boundary of the built up area of Tilehurst, up to Sulham Woods.

9.27 The site itself is mostly unconstrained and forms mostly developable land which relates well to the existing settlement of Tilehurst. Access to the site is available in multiple location in situ. Furthermore, there is ample space to mitigate impacts and work around the TPO's, RPA's, Ancient Woodland and Local Wildlife Areas to the west of the site, through the means of green and blue infrastructure.

9.28 The main constraint to overcome would be the impacts on the North Wessex Downs AONB and local landscape sensitivity. A nearby site (TIL 16) was assessed in the HELAA. It should be noted that the site in questions has significantly less natural screening than Land west of Little Heath Road, however, the following comment was made:

“The area has a strong rural character, and sense of tranquillity and wooded setting which is especially valued given the close proximity of the urban edge. Concern that development would cause harm to the natural beauty and special qualities of the AONB”

9.29 Furthermore, the site was assessed at Appendix J, under reference EUA036, of the 2014 Landscape Capacity Assessment of Potential Housing Sites within and adjacent to the North Wessex Downs Area of Outstanding Natural Beauty, West Berkshire: Final Phase 2 Report: Eastern Urban Area.

9.30 The assessment recognises that site as being located in the 'LLCA13E: Little Heath Gravel Plateau' which has an overall sensitivity of medium to low. The assessment is summarised, as follows:

- In terms of the site's relationship with the existing settlement, the site is already influenced by development in Tilehurst and by modern development in the historic extensions west of the Little Heath Road.
- In terms of the site's relationship with the countryside, the western area has a close relationship with the continuous wooded escarpment to the west. The eastern part is more fragmented but contains better field boundaries with distinctive lines of trees and small tree groups which characterise the edge of the plateau next to Tilehurst.
- In terms of visual characteristics, development over most of the site would result in the loss of distinctive field patterns, important tree lines, the plateau landscape of the AONB. However, the flat landscape enables easier accommodation of development.
- In terms of key settlement characteristics, major expansion westwards would not be out of keeping with the scale within Tilehurst but would fail to respect the more fragmented and semi-rural settlement edge character. However, the recommendation states that the area of the site between Beal's Lane and Broxgrove House, has potential for housing development given it is very well contained by tree cover.
- In terms of compliance with the NPPF (2012), development on the majority of this site would have a significant adverse impact on the natural beauty and special qualities of the AONB and its setting. However, a small part may have the potential for some limited development.

- 9.31 To conclude the findings, the site is naturally very well screened, visually, of long views from and to the wider North Wessex Downs AONB, which reduces the overall AONB impact. The assessment therefore finds that adverse impacts would be limited to local visual impacts on the plateau landscape and development may fragment semi-rural settlement edge character and setting. However, the assessment also notes that the site does already have suburban influences from Tilehurst which break up the landscape, including Kiln Lane Beal's Lane and Little Heath Road.
- 9.32 Furthermore, the majority of the site is well screened from the urban of Tilehurst owing to mature vegetation along Little Heath Road. Development in these locations would resultantly have limited outlook/visual impacts on the landscape, from the urban area. The irregular shape of fields which are bounded by mature trees and clusters of residential extensions further accentuate the natural screening and reduced sense of 'openness'. It is for this reason why the 2014 LCA recommended development potential in the southern part of the site.
- 9.33 It is however acknowledged that the northern part of the has a more open setting and development would need to retain the landscape character of this area of the site. Darcliffe is prepared to commission further landscape and visual studies to explore ways in which to sensitively develop this area of the site through a full understanding of potential implications. A development would likely propose retention of open space and mitigation features in this area of the site by the means of public open space, green/blue infrastructure and tree planting to screen selectively placed built form. Similar mitigation measures have been undertaken by Darcliffe at Stoneham Park which is also an allocated AONB site in Tilehurst.
- 9.34 Darcliffe is committed to ensuring that residential development at the site is accommodated without harm to the natural beauty of the AONB. Darcliffe is therefore committed to preparing a detailed Landscape and Visual Impact Assessment to inform the detailed design of the development proposal, to ensure that potential impacts are sufficiently mitigated and/or screened as appropriate.
- 9.35 Although specific to 'decision making of planning applications', it is also relevant that paragraph 177 of the National Planning Policy Framework (NPPF) sets out that major development in the AONB should be refused other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest. Consideration of such applications are therefore required to include an assessment of:
- a) *the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;*
 - b) *the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and*
 - c) *any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated."*

- 9.36 In relation to point 'a', Section 3 of this representation sets out the need for AONB development owing to the scale of housing need within WBDC.
- 9.37 In relation to point 'b', Section 4 of this representation sets out the cost of and scope for not allocating sites within the AONB in order to meet housing need with a particular focus on land which has a functional relationship with the west of Reading.
- 9.38 In relation to point 'c', the environmental implications are addressed above within this 'Suitability' sub-section.
- 9.39 Consequently, the potential concerns relating to the suitability of the site are not considered to represent absolute constraints to development and can be appropriately overcome. Darcliffe considers that the site is therefore suitable for development in relation to the provisions set out in Planning Practice Guidance.

Achievability

- 9.40 Given that the site is both *available* and *suitable* for the proposed quantum of development within the plan period, in combination with the modest scale of the site, it is considered that the proposed quantum of development identified within the current allocation could be achieved on the site within the first five years of the proposed plan period.
- 9.41 Furthermore, as identified through these representations it is considered that the site is capable of accommodating a greater quantum of development (approximately 322 new homes). Consequently, the site is considered to be *deliverable* in relation to the terms of the PPG.

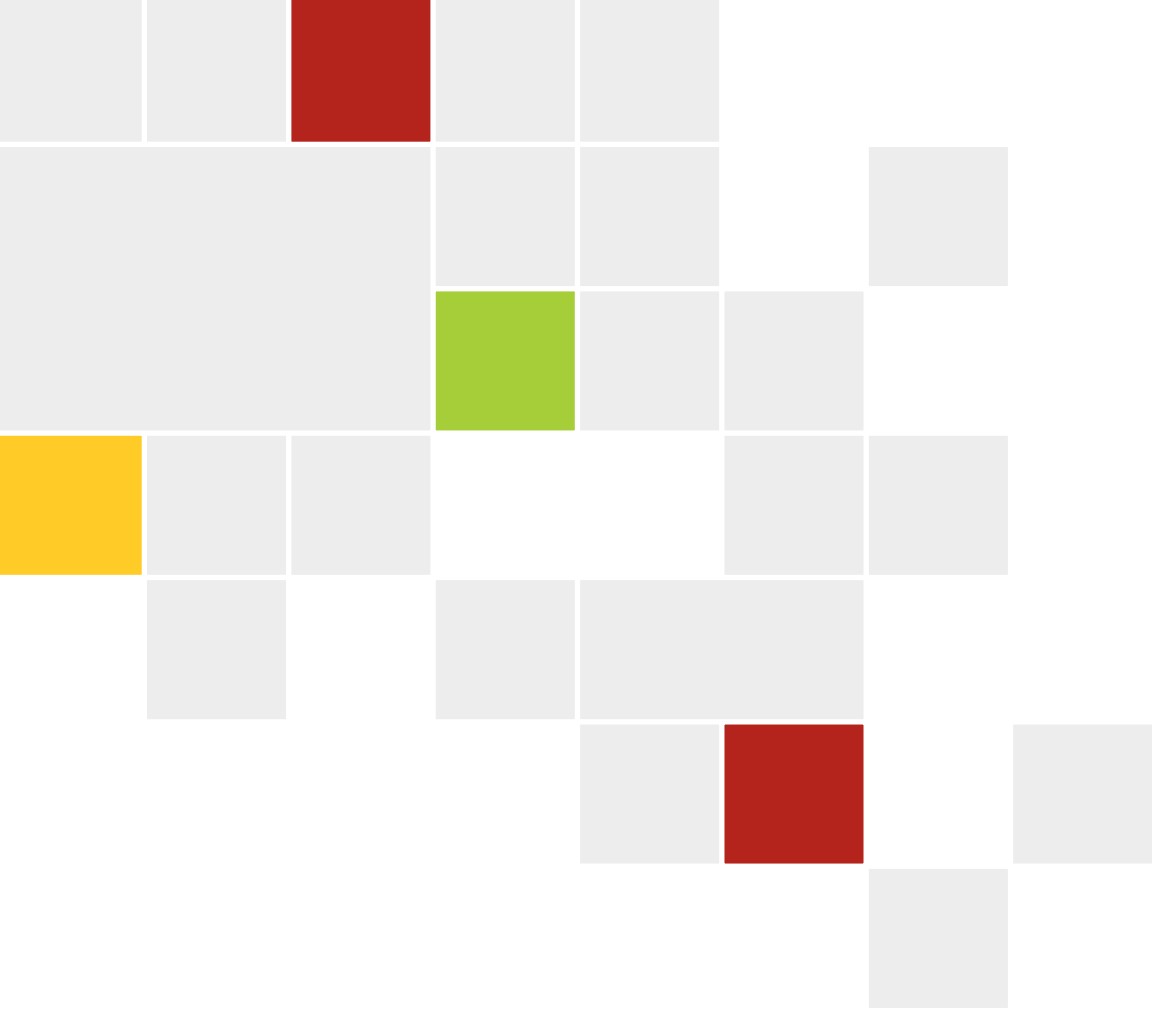
Deliverability

- 9.42 As set out above, the site is *available* for development now, is in a *suitable* location for residential development, and is *achievable* for development in the early part of the proposed plan period. Consequently, the site is considered to be *deliverable* in relation to the provisions set out in Planning Practice Guidance.
- 9.43 Darcliffe have a track record for delivering housing in Tilehurst with this landowner as per Stonehams Farm example which secured planning permission in 2019 for 75 homes. Furthermore, as a SME housebuilder, rather than a land promoter, Darcliffe would build out the homes themselves at a fast rate, without the need to further sell on the land.
- 9.44 Allocation of the site for 322 new homes is considered to be necessary to ensure that the emerging local plan is *positively prepared* and *effective* in meeting the identified housing needs for the district and in assisting with meeting unmet need arising from outside of West Berkshire.

Darcliffe's Delivery History in Tilehurst

- 9.45 Darcliffe have an excellent history of delivering sites in Tilehurst having successfully promoted two sites through the West Berkshire Local Plan in 'The Ridings' and 'Stoneham Park'.

- 9.46 The Ridings, completed May 2020 and created 35 new homes for the local community. The need for housing in the area is highlighted by the fact that 15 of the 21 private residents moved from a Tilehurst Address to The Ridings. Three from Reading, two from Emmer Green & one from Early so every private purchaser already had a Reading postcode. 5 of our private buyers were first time buyers.
- 9.47 Stoneham Park is progressing well and has seen 46 completions at the time of writing this representation. The scheme will be fully occupied by the end of 2023 delivering 66 new homes (40 Private and 26 Affordable). Darcliffe have two plots of unreserved (apartments) and the rest have all either exchanged or reserved pending completion. Again, for a scheme of this size Darcliffe have had an incredibly local market. 19 of Darcliffe's purchasers moved to Stoneham Park from a Tilehurst Address, a further 11 from a Reading address, 3 from Caversham, 1 from Calcot and one from Pangbourne. This leaves only three of Darcliffe's incoming residents that did not move from an RG postcode. So far, 7 first time buyers have been helped.
- 9.48 Darcliffe are a privately owned business, with a social conscience. Darcliffe's build quality and standard specification has established a reputation from the local community for being 'different' to most housebuilders. Darcliffe's Sales Manager notes that numerous residents have stated that they had never even considered a new build before they viewed Darcliffe's product.
- 9.49 Darcliffe employ a local modest workforce, most of which live in Tilehurst or the surrounding villages. Darcliffe have also contributed in excess of £1,100,000 in CIL payments to West Berkshire across the two above sites. Alongside delivering 26 affordable units at Stoneham Park and 14 at The Ridings. Darcliffe worked with Sovereign Housing association on both schemes and their feedback was as follows – *“The homes on both sites were in high demand and proved very popular with customers seeking rental homes as well as shared ownership. Both schemes were really positively received in terms of demand and quality of the build.”*
- 9.50 Darcliffe have enjoyed a good working relationship with West Berkshire and the various officers we have worked with. We would like to feel we have been easy to deal with ourselves.



Boyer

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