



Development Management Highway DC Appeal Statement

APPLICATION NO.	251486
APPEAL REF:	APP/6005646
APPEAL SITE:	Land west of Edney's Hill, Barkham Road, Barkham
PROPOSAL:	Full application for the proposed erection of 16 no. dwellings with new access off Edney's Hill, plus footpaths, car ports, parking, landscaping and associated works.

1. AUTHOR BIOGRAPHY

- 1.1. My name is Ben Amey. I am a Principal Highways Development Management Officer at Wokingham Borough Council (WBC), the Local Highways Authority (LHA). I am a Chartered Member Institute of Logistics & Transport (CMILT) and a member of Chartered Institution of Highways and Transportation (CIHT).
- 1.2. I have over 11 years of experience working in the public and private sector including appearing at numerous public hearings.
- 1.3. I joined WBC in May 2025. Prior to this I worked in Highways Development Control for Slough Borough Council (2020 – 2025) and for private sector transport consultancies (2014 – 2020).
- 1.4. Whilst my colleague considered the application, I know the site area well and have visited the site and its surrounds to examine the proposals and potential mitigation options.

- 1.5. The statements in this evidence are to the best of my knowledge true. Any professional opinions expressed are my own, provided in accordance with the professional standards for the institutions to which I belong.

2. Reason for refusal

- 2.1. Highways Development Control has commented on Planning Application No. 251486 on 1st August 2025, and no further information has been received thereafter. The LHA recommended to refuse the application on 29th September 2025.
- 2.2. This statement provides evidence in support of refusal reasons 3 and 4 of planning application 251486, which are as follows:
3. *The location of the proposed development is unsustainable in transport terms as the proposed development is not within suitable distances of day-to-day local facilities and amenities, including areas of public open space, by non-motorised transport modes, and will result in a high level of car dependency contrary to the sustainable goals in Section 8 and 9 of the NPPF, as well as policies CP1, CP2, CP3 and CP6 of the Core Strategy and TB08 of the MDD Local Plan.*
4. *In the absence of adequate information regarding satisfactory access arrangements, visibility splays and turning area for vehicles entering/exiting the site, it has not been demonstrated that the proposal will not lead to a detrimental impact on both highways and pedestrian safety, and that the development can be adequately serviced in terms of waste provision. The proposal is contrary to policies CP1, CP3 and CP6 of the Core Strategy, policy CC04 of the MDD and the NPPF.*

3. Background

The Proposal

- 3.1. The appellant proposes to erect 16 no. dwellings and to create a new primary site access onto Edney's Hill. The site is at Land west of Edney's Hill, Barkham Road, Barkham. 26 allocated car parking spaces have been proposed.

- 3.2. The site is currently a paddock with no existing structures and is largely open land. The existing farm gate provides access onto Edney's Hill.
- 3.3. The site is considered unsustainable (Refusal Reason 3) due to:
- a) The distances required to walk to local facilities and amenities are too far to encourage the use of sustainable modes.
 - b) The environment and route available for walk/cycle to local facilities and amenities is not safe and attractive for considering sustainable travel mode for day-to-day activities.
 - c) The consequence of this will be failure on giving priority first to pedestrian and cycle movements with neighbouring areas, leading to an unacceptable level of dependency on the car, which is contrary to the Development Plan and NPPF.
- 3.4. The site is proposed to be served by a vehicular access onto Edney's Hill and two pedestrian access onto Barkham Road. Internal roads are proposed to be shared surface with a minimum width of 4.8m along the primary access road.
- 3.5. Insufficient details of the access and internal access roads have been provided during the planning application for the LHA to assess the acceptance of the proposed arrangements (Refusal Reason 4).

Planning History

- 3.6. The site has history of three planning refusals (Application No. 161412, 162084 and 171276) for 5-8 no. custom-built dwellings. These proposals were not refused on highway grounds.
- 3.7. It is relevant to note that these proposals were determined under the 2012 version of NPPF, which provided a less rigorous approach to sustainable transport. However, the latest NPPF (dated December 2024) has significantly more emphasis on prioritising sustainable travel modes, limiting future car use and promoting well-designed places.
- 3.8. An inspector granted appeal (201475) on the opposite side of Barkham Road on sustainability grounds; however, it is relevant to note that 201475 is in

relation to four dwellings, which is one-fourth the scale of the proposal in this appeal. The differences in development scale results in a different scale of travel demand and therefore different expectations for suitable mitigations to sustainable transport links to reduce the number of vehicle trips on the road network.

- 3.9. The benefits of the current proposal have to be weighed based on the latest policy and the scale of the development, which introduces material differences between this development and the other three previous proposals.

4. POLICY

Wokingham Borough Core Strategy Development Plan Document

- 4.1. The starting point for decision making is the development plan. A key spatial issue for the borough as set out in the Core Strategy is *‘to concentrate development in the areas with best access to users/occupiers and other services’*.

- 4.2. Policy CP1 states that development should:

10. *“Provide attractive, functional, accessible, safe, secure and adaptable schemes”*
11. *“Demonstrate how they support opportunities for reducing the need to travel, particularly by private car in line with CP6”.*

- 4.3. In Section 6, I will expand with further information on the active travel network.

- 4.4. Policy CP2 states that development should ‘contribute to the provision of sustainable and inclusive communities’, and Policy CP3 states development should *‘provide a functional, accessible, safe, secure and adaptable scheme’*. In Sections 5 and 6, I will expand my evidence to show that potential occupiers will not be in an accessible location to meet the needs of all sections of the population, and that their limited options for sustainable travel will not be safe. In Section 8, I will explain the highway safety concerns of the proposals.

- 4.5. Policy CP6 states of the Core Strategy states that:

'Planning permission will be granted for schemes that:

- a. Provide for sustainable forms of transport to allow choice;*
- b. Are located where there are or will be at the time of development choices in the mode of transport available and which minimise the distance people need to travel;*
- c. Improve the existing infrastructure network, including road, rail and public transport, enhance facilities for pedestrians and cyclists, including provision for those with reduced mobility, and other users;*
- f. Enhance road safety; and*
- g. Do not cause highway problems or lead to traffic related environmental problems.'*

4.6. In Sections 6 and 7, I will expand my evidence to show that potential occupiers will have no or limited choice of sustainable transport. Meanwhile, In Section 8, I will elaborate on the potential risks on road safety or highway problem induced by the proposal.

4.7. The supporting information in policy CP6 states that:

'Paragraph 2.16 recognises that the borough has one of the highest car ownership rates of any English local authority. To reduce the likelihood that these vehicles will be used and to encourage modal shift, it is important to ensure all proposals achieve sustainable development.'

'To help achieve sustainable development, proposals likely to generate significant demands for travel movements should be located in areas with best access to existing good services. This means that people can have the widest range of choice in selecting transport modes and help reduce the use of the private car. The availability of good existing public transport services has been considered in drafting the strategy for the Borough.'

4.8. In Sections 5-7, I will expand my evidence to record how the Borough has made progress to address high levels of car ownership and tackle the needs, including efforts to support more sustainable forms of transport.

4.9. Policy CP11 refers to limiting development outside of settlement limits for several reasons including reducing the reliance on private motor vehicles:

‘Preventing the proliferation of development in areas away from existing development limits is important, as they are not generally well located for the facilities and services. Proposals for development, which would be an increase over what currently exists (outside development limits) are likely to lead to increased use of the private car as they are poorly served by other transport modes contrary to Policy CP6.’

4.10. In Sections 5-7 I will expand my evidence to record efforts to manage travel needs and support more sustainable forms of transport.

National Planning Policy Framework (NPPF)

4.11. Paragraph 83 of the NPPF states:

*“To promote **sustainable development** in rural areas, housing should be located where it **will** enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this **will** support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.” [my emphasis].*

4.12. The Appellants have not identified how the development ‘will’ enhance or maintain vitality of the rural community or support local services.

4.13. Paragraph 89 of the NPPF states:

*“Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it **will** be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and **exploits any opportunities to make a location more sustainable** (for example by improving the scope for access on foot, by cycling or by public transport).” [my emphasis].*

4.14. The Appellants have not identified how the development site 'will' meet local business and community needs to justify the location of development. It also fails to exploit 'any' opportunity to make a location more sustainable, which I will expand on in Section 6 and 7.

4.15. Para 110 of the NPPF states:

'The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.'

4.16. Para 115 of the Framework states that "...in assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

- a) *sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location;*
- b) *safe and suitable access to the site can be achieved for all users;"*

4.17. Para 116 of the Framework states that "Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios."

4.18. Para 117 of the Framework states that applications for development should

- a) ***"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;

- b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;*
- c) 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;*
- d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and*
- e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.” [my emphasis]*

4.19. I will expand in Section 6, the appellants have not given priority to pedestrian cycle movements. As I will expand in Section 7, the appellants have not facilitated access to high quality public transport.

4.20. Para 118 of the Framework states that “...*all developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a vision-led transport statement or transport assessment so that the likely impacts of the proposal can be assessed.*”

Policy Papers on Walking and Cycling

4.21. Department for Transport has set out objectives for promoting active travel modes and financial resources to support these objectives. The second cycling and walking investment strategy (CWIS2) covered the period of 2021 to 2025, and the emerging third cycling and walking investment strategy (CWIS3) will run from 2025 to 2030.

4.22. CWIS2 aims to make walking and cycling the natural choices for shorter journeys, or as part of a longer journey by 2040, to provide a safer, and people-friendly route enabling active travel, with a headline target of achieving the objectives for 55% of primary school-aged children to walk to school by 2025. CWIS3 has reinforced the objectives to promote walking, wheeling and cycling to be safe, easy and accessible option for everyone by 2035.

Meanwhile, CWIS3 empowers local government across England to embed active travel into the local transport systems.

4.23. The walking and cycling distances and environment between the site and key facilities are unfavourable to achieve government objectives at this site, and contrary to paragraphs 96 and 117 of NPPF. This is further elaborated in Sections 5-7.

Other standards and guidelines

4.24. The Borough Design Guide sets out as one of its key design objectives – Connection and Accessibility:

- a. *Provide facilities to promote all modes of transport, including in particular walking, cycling and public transport, and*
- b. *Reducing the need to travel, through the location of development to promote integration and accessibility.*

4.25. Manual for Streets puts well designed residential streets at the heart of sustainable communities. A higher priority is assigned to pedestrian and cyclists. It recognises that residential streets should create places that work for all of the community. It also states that a crucial factor in the design of a new development is the consideration of the needs of the street users. This means that the design should aim to be inclusive, providing, wherever possible, the opportunity for all kinds of road users to fully access the facilities of the development.

4.26. Regarding distance to facilities, Manual for Streets advises in Paragraph 4.4.1 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'.*

4.27. Local Transport Note 1/20 (LTN 1/20) provides the technical framework through which the aims of the NPPF to prioritise walking and cycling and reduce reliance on the private car are to be delivered in practice. It sets out the national guidance for the planning and design of cycle infrastructure and establishes the principles that cycle networks and routes should be Coherent;

Direct; Safe; Comfortable and Attractive. LTN1/20 emphasises that cycle infrastructure should be accessible for everyone. It also provides standards for how cycle infrastructure should be designed that enables cycling to be a realistic and attractive option for everyday trips.

4.28. The Borough's highway design guidance (2019) outlines the key principles to follow when producing new highway layouts for all types of development. These layouts should be compliant with the philosophy of Manual for Streets and Manual for Streets 2 by creating quality places that are fully accessible by all modes of transport. The emerging Local Plan Update expects the highway layout of all new developments to follow the key principles to highways design set out in this document.

4.29. The above policies and standards set the benchmark against how this proposal is to be assessed, and Sections 5-8 demonstrate its non-compliance.

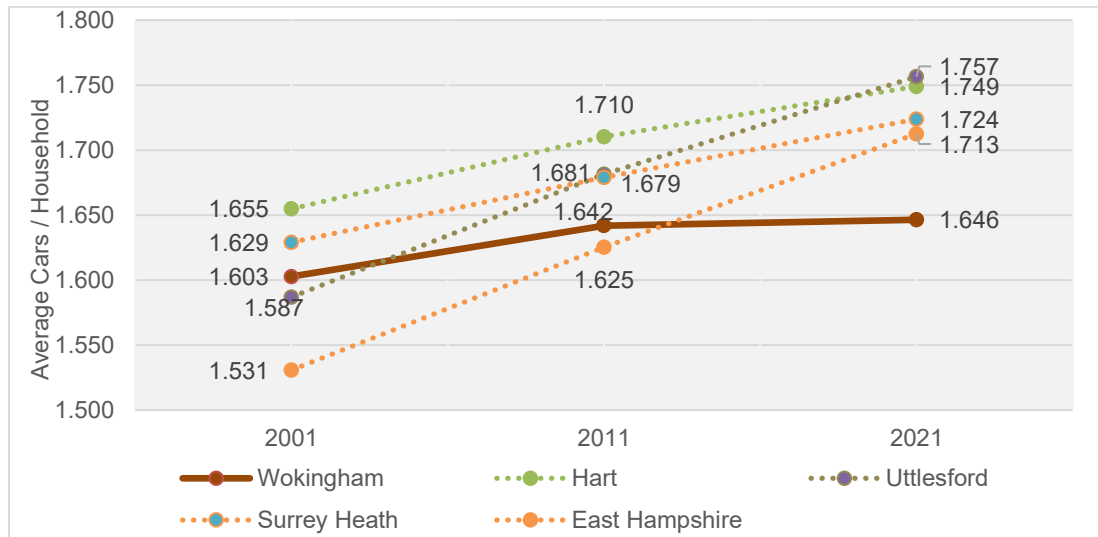
4.30. My Planning Colleagues will deal with the conflicts with the policy and guidance in more detail, but it is considered that the proposed development conflicts with policy due to the unsuitability of the location and highway safety.

5. PROMIXITY OF FACILITIES AND SERVICES

Background

5.1. WBC has had one of the highest levels of car ownership in the Country. Despite national efforts to reframe sustainable transport, across England car ownership levels have continued to increase around ½% each year. Through proactively planned development policies WBC has begun to break this trend, falling from the 3rd highest to now 8th.

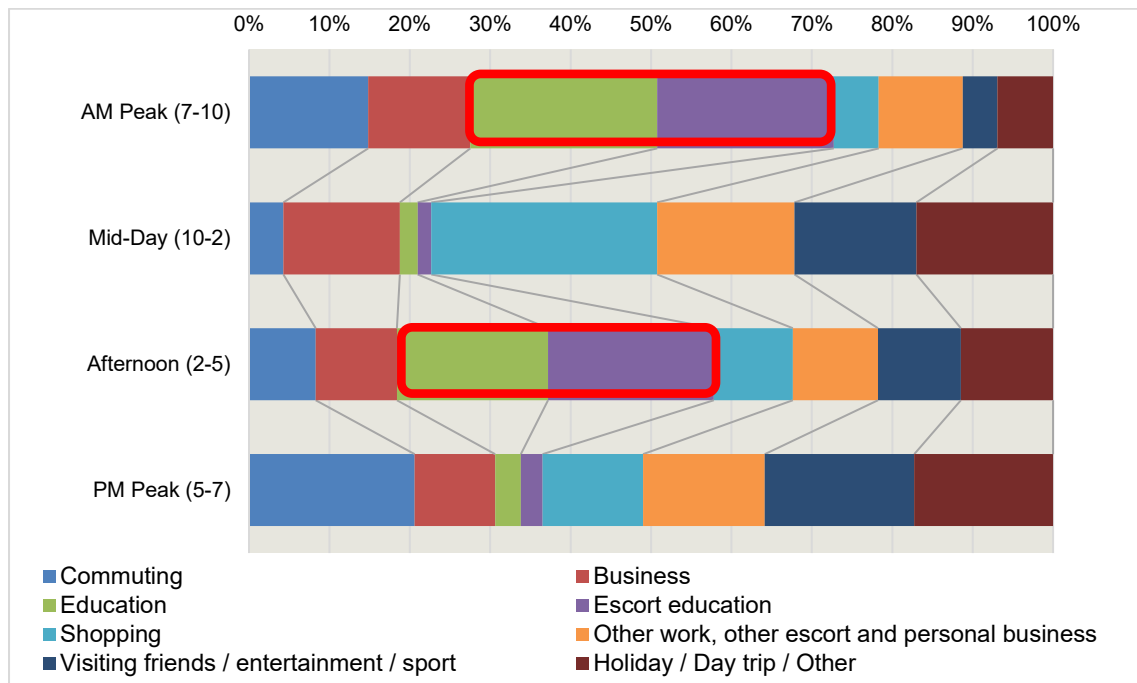
Figure 5.1 – Average Car Ownership per dwelling (Census)



5.2. Through the Core Strategy, WBC also planned to support home working, imposing planning obligations to support high-speed and now ultra-fast broadband, through the delivery of ducting to accelerate fibre to premises. Whilst the proportion of residents working from home (all of the time) has not reached targets the proportion of hybrid working has offset the difference. WBC has also seen internet-based shopping trends slightly ahead of national levels reducing the need to travel.

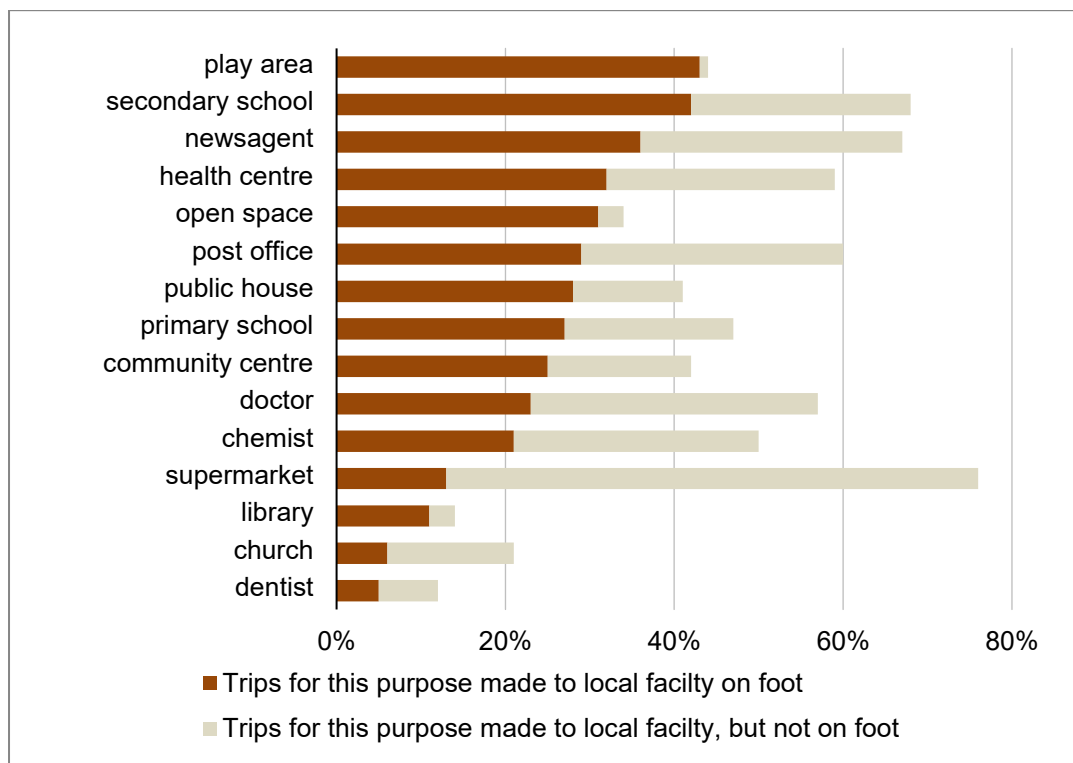
5.3. Unfortunately, these seemingly subtle shifts in travel demand, particularly for non-travel, have adversely affected the viability of public transport in the Borough. Similarly greater flexibility in school preference has induced additional car-based travel. Using Figure 5.2 I will seek to highlight the trip purpose opportunities that exist to assist the Inspector when considering if these have been pursued or exploited to meet the sustainable development test identified in NPPF.

Figure 5.2 – Trip Purpose by Time of Day, NTS



5.4. Figure 5.3 reproduces information from a study of a community in southwest England¹. It records the proportion of trips to some facilities that could be captured locally, and therefore helping set some potential for land use accessibility.

Figure 5.3 – Trips Captured by Local Facilities



¹ [Less Traffic Where People Live](#)

5.5. For smaller schemes like this proposal, sustainability depends heavily on day-to-day travel behaviour instead of network capacity. Figures 5.2 & 5.3 highlight those facilities that are likely to contribute most to patterns of sustainable travel to be examined further below:

- Commuting
- Education (including escort education)
- Shopping
- Visiting friends/Other (including leisure and health)

Measuring Accessibility

5.6. The Borough Design Guide SPD states that *‘if places are to be sustainable then the aim should be to create: Walkable neighbourhoods, with a range of facilities within 10 minutes walking distance of residential areas, which encourage people to travel on foot or by bicycle.’*

5.7. In addition, walkable neighbourhoods are defined in Manual for Streets as those typically characterised by having a range of facilities within 10 minutes walking distance from residential area. Manual for Streets clarifies that 10 minutes walking distance is roughly 800 metres.

5.8. The National Design Guide (2019) confirms that “walkable neighbourhoods” means *‘local facilities are within walking distance, generally considered to be no more than a 10-minute walk (800m radius).’*

5.9. None of these guidance documents expressly distinguish between urban, suburban and rural locations, which implies that the 800m/10-minute threshold is applicable in all contexts.

5.10. The IHT’s Guidelines for Providing for Journeys on Foot makes the following recommendations for suggested acceptable walking distances for pedestrians without a mobility impairment:

Table 5.1 Suggested Walking Distance

	Town Centres (m)	Commuting/ School (m)	Elsewhere (m)
Desirable	200	500	400
Acceptable	400	1000	800
Preferred maximum	800	2000	1200

5.11. This table suggests that 800m is an acceptable walking distance for locations outside of town centres, which presumably includes rural areas, for journeys other than commuting or travelling to school. In my opinion, the reason commuting and school travel is considered differently is because there are these one-way outbound trips, whereas others will be considered two-way (to the shop and back in shorter duration).

5.12. The appellant's Transport Appeal Technical Note (ref. 1052.0002/TN/3) has set out the distances to various facilities and services that would serve the residents of the proposed dwellings. In view of the day-to-day facilities and services that have not been included in the assessment, the LHA has verified and updated the table below. The distances are based on the actual routes pedestrians would use via the shortest continuous pedestrian routes. Walking distances (one way) and times (based on 5kph, 1.4m/s, faster than Chapter 6 of Traffic Signs Manual (6.7.2 [CH6TSM](#))).

Table 5.2 Walking Distance and Time to Local Facilities and Services

Destination	Location	Distance (Km)	Walk Time (Mins)
Shops	Barkham Village Store and Post Office	0.4	5
	The Bull Public House	0.6 (Temporary Closed)	7
	Ye Olde Leathern Bottel	1.5	18
	Lidl	2.3	28
Schools	Toad Hall Nursery	0.9	11
	Barkham Pre-School (Church Lane)	Permanently Closed	N/A
	The Coombes C Of E Primary School	2.1	25
	Evendons Primary School	2.3	28
	Bohunt School Wokingham (Secondary)	3.4	41
	The Emmbrook School (Secondary)	3.9	47
Health	Woosehill Medical Centre	2.6	31
	Tesco Pharmacy	3	36
	Nine Mile Ride Dental Practice	3.3	40
	The Finchampstead Surgery	4	48
Leisure and Community	Barkham Recreation Ground	1	12
	Barkham Village Hall	1.3	16
	St James Church	1.3	16
	Wokingham Leisure Centre	3	36
Employment	Barkham Grange	1	12
	Fishponds Industrial Estate	2.6	31

Destination	Location	Distance (Km)	Walk Time (Mins)
	Mulberry Business Park	2.7	32
	Hogwood Industrial Estate	3.4	41
Nearest Bus Stop	Bearwood Road (Westbound)	0.05	1
	Bearwood Road (Eastbound)	0.2	2
Train Station	Wokingham Railway Station	2.7	32

5.13. Local facilities and services within acceptable distances are highlighted in yellow. In my view, this table reinforces that only a limited range of facilities and services would be within an acceptable (or even the preferred maximum) distance from the site, and the potential for accessing the range of facilities contribute most to patterns of sustainable travel in Figures 5.2 and 5.3 are limited.

5.14. Manual for Streets outlines that: *‘Walkable neighbourhoods are typically characterised by **having a range of facilities within 10 minutes**’ (up to about 800 m) walking distance of residential areas which residents may access comfortably on foot’*

Education

5.15. The nearest nursery school is circa 900m from the site, which caters for children from 3 months old to 5 years old. While the walk distance is considered acceptable, Edney’s Hill is subject to national speed limits with no existing footway or cycleway between the site and the site, which is particularly unattractive for parents to consider walking with children below 5 years old along the carriageway, twice a day.

5.16. The nearest primary school is over 2km away (29 minutes’ walk) and the nearest secondary school is over 3km away, no primary and secondary schools are accessible on foot. In view of the walking environment along Edney’s Hill and cycling environment along Barkham Road, it is doubtful that any trips to school would be undertaken by sustainable modes. This also reduced the likelihood of achieving the national objectives for 55% of primary pupils to walk to school as stated in CWIS2.

Shopping

5.17. There is no local centre in proximity. The nearest and only local shop is Barkham Village Store is a convenient store to be accessed via BARK19, which offers a limited choice of goods that required for top up shopping rather than a main weekly shop.

5.18. The nearest supermarket (Lidl) is located at Ashville Way in Wokingham, which is 2.3km (33-minutes' walk) from the site. The walk distance would still be beyond the preferred maximum. Any potential for sustainable travel is likely to be reliant on motorised modes and/or a pass-by trip.

Business & Commuting

5.19. There are few employment areas in the locality, the main commercial/industrial areas shown are exceeded 2.5km from the site.

5.20. While a smaller employment unit Barkham Grange is available nearby offering small scale employment opportunities, the existing footway only presence along the western side of Barkham Street. The footway is circa 1.5-1.8m wide, with at least three pinch points of 1m wide. No street lighting is presence beyond 50m south of the B3349 / Barkham Street junction. This is examined further in Section 6.

Personal Business & Other Trips

5.21. There is no doctor's surgery nor pharmacy in Barkham. The nearest GP and pharmacy are at Wokingham, which are over 2.5km from the proposed development.

5.22. Leisure facilities including recreation grounds or leisure centres that serve day-to-day needs of residents of the proposed development has exceeded the acceptable walk distance. It is relevant to note that while Barkham Recreation Ground is located within the preferred maximum walk distance, the guidance 'Fields in Trust Standards: Creating great spaces for all' (2024) considers all homes should be within 200m to 300m walking distance of open space and that a full range of open space types should be within 1,000m.

5.23. Therefore, the facility is considered to be too far and too small to serve the proposed development, which results in poor access to meaningful areas of public open space. This will be further elaborated by the separated evidence in Green Infrastructure Statement.

5.24. Given the limited range of facilities in the area, there would be no or limited opportunities for linked trips as there is no local centre within acceptable walking distances. This contributes to the unsustainability of the location.

6. WALKING AND CYCLING ROUTE

6.1. Whilst distance to local services and bus stops is one factor in the choice of walking, Manual for Streets recognises that walking is not only influenced by the distance, but also of the quality of the walking experience including but not limited to the quality of the footway, its width and proximity to traffic, and where pedestrians might be expected to cross streets.

Off-site Route Quality & Environment

6.2. Other than the local pub, the most direct pedestrian routes from/to all key facilities and services within acceptable walking distance are provided by either Edney's Hill, or byway opens to all traffic (BARK19).

6.3. Edney's Hill is an unclassified road subject to national speed limits. There are no continuous pavements nor street lighting on either side of the road, thus not attractive for walking/cycling. As stated in appellant's transport technical note, the 85th percentile speed is 26.3-26.8mph with an average two-way traffic of 1,270 vehicles per day. While there might be potential for extending the existing quiet lane along Evendon's Lane towards Edney's Hill, the existing traffic along Edney's Hill would have exceeded the suggested threshold of 1,000 motor vehicles per day. The 1,000 vehicle per day threshold is set for shared use between vehicles and pedestrians in DfT TAL 3/04, which is consistent with practices adopted by other local authorities.

6.4. BARK19 is a byway opens to all traffic (BOAT) subject to 30mph speed limits. Bollards have been installed at BARK19, circa 18.5m south the junction of

Bearwood Road / Aggisters Lane. Walking and cycling along the carriageway is expected and the route is also unlit.

- 6.5. Given both routes are unlit and have no separated footway/cycleway, they cannot be considered as attractive routes for pedestrians and cyclists. Alternatively, pedestrians or cyclists have to divert to the B3349 Barkham Road and Bearwood Road with additional 150m walk distance for street lighting. 2m wide footways are available on both sides of Bearwood Road and the B3349 Barkham Road.
- 6.6. Based on distance alone, most local services would be within an acceptable cycling distance, however, there is no direct and continuous off-road cycling route to the local facilities. The best cycling routes in most case will be equivalent to the pedestrian routes.
- 6.7. While the speed limit along the B3349 Barkham Road is 30mph, it is relevant to note that the motor traffic flows between Bearwood Road and Barkham Street exceed 12,000 pcu/24 hour, based on the council's traffic surveys conducted in summer 2024. Cyclists would be expected to cycle mixing with vehicular traffic, which the LTN1/20 defines these as 'mixed traffic' conditions. 'Mixed traffic' conditions with traffic flows above 6,000 pcu/24 hour are considered as *"Suitable for few people and will exclude most potential users and/or have safety concerns"*. LTN1/20 specifies that safe cycle routes for most users will consist of protected spaces where the cyclists are separated from vehicular traffic. LTN1/20 also highlights that: *'Motor traffic is the main deterrent to cycling for many people, with 62% of UK adults feeling that the roads are too unsafe for them to cycle on'*.
- 6.8. The nearest crossing point is a pedestrian refuge island circa 100m west of the site pedestrian access, measured 1.8m in depth x 2m in width, which does not fully meet the absolute minimum standard for a shared use refuge island of 2.5m in depth x 2m in width required in DMRB CD 143. While LTN 1/20 requires refuges to be at least 3m in depth, it also considers uncontrolled crossing 'will exclude most potential users and/or have safety concerns' for the given level of traffic flow along the B3349 Barkham Road.

6.9. The existing routes do not align with the general design principle of walking and cycling routes shall be free from unnecessary diversions, frequent obstacles and fragmented facilities in DMRB CD143. The absence of safe and attractive pedestrian / cycle routes discourages the use of sustainable modes. The absence of street lighting would also make it unlikely that people would walk or cycle during the inclement weather and darker days in the months between late October and late March. Therefore, residents would likely travel to the local facilities by car due to the environment of these roads not making the route attractive for pedestrians nor cyclists.

6.10. Policy CP6 seeks to create a modal shift away from private car use and unsustainable modes of transport. Meanwhile, CWIS2 and CWIS3 seek to provide safer cycle routes to everyone. The proposal, therefore, conflicts with this spatial objective of the development plan and fails national objectives.

Connectivity within the Development

6.11. In addition to the concerns regarding off-site walking and cycling network, the internal roads have not been designed to maximise the connectivity of pedestrians and cyclists.

6.12. Despite two 2m wide pedestrian accesses are proposed onto the Barkham Road to connect with the existing public footway, the desire lines of pedestrians from half of the site (Plots 8-16) would be a direct route available between Plots 4 and 5.

6.13. It is also relevant to note that the proposed design will only meet the requirements for a pedestrian route, but not a shared infrastructure for both pedestrians and cyclists.

6.14. While the LHA has recommended a shared footpath / cycle path to be provided between Plots 4 and 5 during the planning stage, this has not been considered by the appellant and the original designs of diverted footway along the internal access road is retained. This results in an additional walking distance of up to 110m which can be avoided with better design. This is contrary to Paragraph 117(a) of NPPF for '*give priority first to pedestrian and cycle movements ... within the scheme*'.

Summary

6.15. The proposed development is a proposal for 16 new dwellings. With the current details available, it would not be well located to existing facilities and services. The proposed development would not promote sustainable travel modes that limit future car use. It would not reduce or minimise the need to travel as required by CP1, CP11 and CP6 of the Core Strategy.

7. PUBLIC TRANSPORT SERVICE

7.1. The NPPF requirement for access to high quality public transport facilities is not quantified, but Wokingham Borough Council does specify the 'good' standard required in the borough's Local Development Framework (WDLF).

7.2. LHA acknowledges that the site has access to 'good' bus services as defined in the WDLF, but bus services are likely the only available options for residents to travel sustainably. This is contradicted with Core Strategy CP6(a) for providing the widest range of choice in selecting in sustainable forms of transport, and the objective in CWIS2 to make walking and cycling the natural choices for shorter journeys.

7.3. Pedestrians and cyclists are defined as higher user hierarchy in MfS. Meanwhile, paragraph 117(a) of NPPF requests giving priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas. It is disappointed that the appellant has not explore to enhance the walking/cycling opportunities as a sustainable alternative to bus.

7.4. Paragraph 96(a) of NPPF considers easy pedestrian and cycle connections to be means of promoting sociability. Walking and cycling can serve as leisure activities, resulting in social interaction. It is, therefore, relevant to note that while good public transport services can be complemented to active travel modes, it does not replace the functionality of walking and cycling, nor compensate for unsafe and unattractive walking and cycling routes.

7.5. Regardless walking and cycling opportunities are limited due to unsafe and unattractive routes, it is unjustifiable to rely on public transport as the only modes to local facilities and services. The results of National Travel Survey

(2024) revealed that 10.9% trips under 1 mile are achieved by driving, compared to 0.2% by taking local bus (outside London). The difference increases to 35% by cars and 2.6% by buses for trips between 1 and 2 miles. Therefore, in practice, people will likely drive instead of waiting for bus when active travel modes are unavailable.

7.6. The LHA is also concerned with the bus reliability during peak hours. The punctuality data of Route 3 between November 2025 and January 2026 revealed that circa 20% of Route 3 buses are delayed for 6 minutes or more, suggesting recurring peak period delays. If the bus were also to be delayed on the return journey; this could add 12 minutes of delay to the round trip. This suggests that the proposed journey time to further facilities and amenities by bus (Table 2 of the transport TN) are unrealistic. The actual journey time will be almost or more than double if the delayed journey time is included which undermine the claimed travelling time. Given walking and cycling are not attractive sustainable options for this site, this further contributes to high car dependency contrary to the sustainable goals in Section 8 and 9 of the NPPF.

7.7. In addition to the absence of mode choices, the eastbound bus stop at Bearwood Road only consists of a flag and a paper timetable. Whilst the westbound bus stop at Bearwood Road consists of a covered bus shelter, it does not meet the council's required standard for the provision of perch seating, a poster panel and anti-graffiti backing for a 'Silver' tier bus stop. No live bus information is provided to inform passengers of delays. Both stops are, therefore, considered to be 'Bronze' tier bus stops. The waiting environment at both bus stops, therefore, would not be attractive especially during inclement weather. No improvements and contributions have been made by the appellant to improve the waiting environment.

8. ACCESS AND ROAD ARRANGEMENTS

8.1. Through the application consultation, the LHA has raised concerns regarding access arrangements, visibility and turning area, and have requested improvements to the design. No further information has been provided to address any of the concerns during the planning stage.

- 8.2. It is welcomed the appellant provides additional information as part of the Transport Appeal Technical Note, and the confirmation of site road adoption status. However, the supplementary details in access arrangement, visibility, and turning area have not been sufficient to overcome the highway previous concerns, eventually result in refusal.

Access Arrangements

- 8.3. The site will be accessed via a new 7.8m wide vehicle access onto Edney's Hill, with internal access road width being revised to 4.1-5.0m wide to accommodate two-way traffic, which is welcomed.
- 8.4. Nevertheless, the existing road width (with pinch point of 4.05m wide) along Edney's Hill is insufficient to accommodate two-way traffic of the proposed 16 no. dwellings, in addition to through traffic and the existing 23 no. dwellings along Edney's Hill. There is concern that the limited road width would result in vehicles reversing towards the mini-roundabout; should they be unable to pass a delivery van, lorry, tractor or fine engine travelling in the opposite direction.
- 8.5. A screenshot below shows narrow width of 4.05m – 4.45m extends for c.33m is provided below:



- 8.6. The appellant suggests that the existing traffic along Edney's Hill are not fully associated with the existing dwellings along the street but mainly contributed by the surrounding area. However, this does not justify the departure from the highway design requirements.
- 8.7. Table A1 of WBC Living Streets: Highways Design Guide (2019) has set out the main standards for new streets in the borough, including the dimensions of carriageway for the given numbers of housing along the street. The required minimum carriageway width of an internal access road for 10 to 25 dwellings is 4.5m, and the minimum width requirement increases to 4.8m for 26 to 50 dwellings. Those requirements are intended to ensure safe two-way traffic movements along internal streets without undue conflicts between opposing vehicle movements.
- 8.8. In appellant's transport technical note, it is suggested that 'Edney's Hill between the site access and Barkham Road measures at 4.2m wide as a minimum with an average width of 4.4m-4.5m wide'. This would fall below the WBC minimum width for an internal site access road. Modern cars measure between 1.930 – 2.05m wide, delivery vans 2.2 – 2.3m wide and refuse vehicles upto 2.5m wide. The Berkshire Fire Service operate a 2.46m wide fire engine (Volvo FL8). Therefore, it is apparent that widths of 4.2m – 4.5m are insufficient for modern cars to pass a delivery van, refuse vehicle or fire truck.(I.e. a 2.073m VW Golf + 2.345m Mercedes Sprinter = 4.418m Total Width without even allowing any passing space between kerbs or wing mirrors).
- 8.9. A Table showing dimensions of modern cars and vans is provided below:

Table 8.1: Widths and Length of Best Selling Cars

2025 Total New Registrations				
Make and Model	Number of Registrations¹	Length²	Width (Mirrors Out)	Width (No Mirrors)
Ford Puma	55,488	4.186m	1.930m	1.805m
Kia Sportage	47,788	4.485m		1.855m
Nissan Qashqai	41,141	4.425m	2.084m	1.835m
Vauxhall Corsa	35,947	4.060m	1.960m	
Nissan Juke	34,773	4.210m	1.983m	1.80m
VW Golf	32,478	4.284m	2.073m	1.789m
Volvo XC40	30,404	4.440m	2.034m	1.910m
MG HS	30,191	4.670m	2.066m	1.89m
VW Tiguan	39,857	4.539m	2.099m	1.839m
Hyundai Tuscon	28,613	4.480m	2.065m	1.850m
Delivery Van Dimensions				
Ford Transit		4.973 (L1)	2.272m	2.080m
Ford Luton Box Van		6.0m	2.4m	
Mercedes Sprinter (L1)		5.267m	2.345m	
Sprinter (L3)		6.96m	2.345m	
VW Crafter		5.986m	2.427m	2.040m
Vauxhall Combi		4.753 (XL)	2.107m	
Vivar Electric		5.331 (XL)	2.204m	

8.10. A minimum width of 4.8m would be expected on Edney's Hill on the basis of National and Local design standards. This is because Edney's Hill is open to through traffic and it is possible that a van or HGV will need to pass a car.

8.11. Manual for Streets Figure 7.1 indicates that a minimum width of 4.8m wide is required for a car to pass a lorry and a width of 5.5m is needed for two lorry's to pass each other. WBC Living Streets (2019) sets a minimum width of 5.0m for streets serving upto 200 dwellings where there is no through traffic and a minimum width of 5.5m at larger sites where through traffic is expected.

8.12. Therefore, 4.05m – 4.45m is clearly substandard and any additional development traffic along Edney's Hill will result in intensification of substandard road width and junction.

8.13. The limited width for vehicles to pass each other is illustrated by the site visit photo below which shows a DHL Box Van Passing the site:



8.14. It is important to understand that the ability of accommodating safe two-way traffic movements is not solely determined by the net increase in traffic demand, but also creation of new site access, introduction of new turning movements and potential conflict points at an existing substandard junction.

8.15. In view of the high traffic flows along the B3349 during the peak hours, any potential delay at the B3349 Barkham Road / Edney's Hill junction (from vehicles waiting or reversing back) could result in queue stacking along the B3349. The LHA, therefore, considers this would result in potential congestion and highway safety risks.

8.16. Despite the potential for any improvements further south is restricted given the presence of a Veteran Tree located 50m south from the B3349 / Edney's Hill junction, the LHA might localised improvements as an alternative to address the potential impacts under the existing site constraints. It is disappointed that the appellant has no intention to propose any mitigation on increasing carriageway width.

8.17. The proposed arrangement represents an intensification of a substandard road width and junction and fails to demonstrate two-way vehicle movements can be accommodated without widening Edney's Hill, to the detriment of highway safety. The proposal is contrary to policies CP3 and CP6 of the Core Strategy and the MDD.

Visibility Splays

8.18. Edney's Hill is an unclassified road subject to national speed limits. As stated in appellant's transport technical note, the 85th percentile speeds for northbound and southbound are 26.8mph and 26.3mph, respectively. Therefore, the required visibility splays of 2.4m x 36.6m (to the south) and 2.4m x 35.7m (to the north) to be provided from the access onto Edney's Hill. The sightlines shall be across land within the applicant's control or highway land and shall be clear of obstructions between 0.6m and 2m in height above the ground within the visibility splay envelope.

8.19. While the Highways welcome the updated assessment has been supported by the speed data, in view of the access is in close proximity to a bend, tangential and forward visibility at the bend are expected to be assessed during the planning stage but still have not been addressed during the appeal.

8.20. I have also overlaid the site layout (Drawing No. WOK-PL101C) with the visibility splays assessment (Drawing No. 1052.0002 – 0001). It is relevant to note that the proposed sightline to the north will likely be across the zone with boundary hedgerows labelled 'VEGETATION HT 2m' highlighted in yellow, and unable to achieve an unobstructed visibility splay to the north as indicated on the plan. This may be achievable with an improved design, but unfortunately, this has not been provided in this appeal for the LHA to assess the acceptance.



Vehicle Manoeuvring

8.21. The Highways welcome the provisions of swept path analysis for fire tender and refuse vehicle in the appeal TN. However, the swept path analysis has not demonstrated the fire tender and refuse vehicle can leave the site in forward gear within the required reverse distance.

8.22. The latest Building Regulations (Approved Document B), and Sections 6.7 and 6.8 of Manual for Streets have suggested the maximum reverse distance for fire service vehicles and refuse vehicles to be no more than 20m and 12m, respectively. The measured reverse distances are circa 31m (fire tender) and 15m (refuse vehicle), indicating both distances are unachievable with the proposed layout. It is relevant to note that the reversing route is along the bend, so straight reversing movement cannot be achieved. This imposes highway safety concerns of the internal road design.



8.23. It is also relevant to note that the swept path for fire tender indicates access from northbound of Edney's Hill via Evendon's Lane, which is unlikely reflecting the direct traffic route between the site and the fire stations in the borough. Fire tender will likely access to Edney's Hill via the B3349 Barkham Road, whereas the swept path analysis for fire tender shall be assessed either with all potential routes, or at least with the anticipated direct route.

9. Conclusion

9.1. This statement provides additional evidence which supports refusal numbers 3 and 4.

9.2. The site is in an area with limited access to local services by walking and cycling, where only the Barkham Village Store is the only facility within

acceptable walking distance requiring persons to cross a busy road which will be a perceived barrier to most.

- 9.3. Bus services are therefore the primary sustainable mode available for potential residents. Given the appellant insists that the site location is sustainable is acceptable, no suitable improvement nor contribution has been proposed in the planning application nor this appeal. The LHA can only assess the merit of the proposal as submitted, which upholds LHA refusal on site sustainability.
- 9.4. I do not see the appellant has given 'priority to pedestrian and cycle movements', they are not 'safe, secure and attractive'. They have not exploited opportunities to make the location more sustainable nor shown how the proposals could meet the definition of sustainable development. This development is therefore contrary to NPPF, CP1, CP3, CP6 and policy S55 3(c) of the Wokingham Borough Council Local Plan update.
- 9.5. Furthermore, insufficient safe access width, parking and turning arrangements had have been proposed. The appellant has still failed to demonstrate that the development will not have an adverse impact on highway safety. Through the application process, the applicant did not amend the submission nor provide supplementary information that would have met the Highways expectations, ultimately leading to the refusal. Highways concerns have yet to be fully addressed in this appeal. The is contrary to policies CP1, CP3 and CP6 of the Core Strategy, policy CC04 of the MDD and the NPPF.
- 9.6. As the appellant considers the existing junction and road width along Edney's Hill to be acceptable, no off-site works has been proposed. The absence of suitable improvement or contribution to the substandard junction and road width uphold my objection to the proposal.
- 9.7. I respectfully request that the appeal to be dismissed.