

MEMORANDUM

From:	Ben Amey Development Control		
Service	WBC Highways	App No:	251105
Address:	The Sapphire Centre, Fishponds Road, Wokingham, RG41 2QL		
Proposal:	Proposed Extension to the Rear of the Existing APACOR Facility by Connecting with an Existing Commercial Building to the Rear with associated works		
Site Visit Made:	Yes (10 th and 11 th June 2025)		

- ☐ No comment
- ☐ No objection
- ☐ No objection subject to conditions (and reasons) **stated below**
- ☐ Request further information before determination as **stated below**
- ☒ Objection due to the reason(s) **stated below**

Consultation Response

Introduction

This document provides further comments from the Local Highways Authority (LHA) in response to application no. 251105 at The Sapphire Centre on Fishponds Road, Wokingham, RG41 2QL.

An initial consultation response was provided dated 18th June 2025. A Technical Note dated 9th July 2025 was submitted by Stantec. Further comments on each topic are added below in **Blue**.

The forms state permission is sought for an additional 1,100sq.m of B2 & B8 Land Use.

It is recommended that planning permission is refused due to a lack of Car Parking provision and a lack of parking and turning space for Delivery and Servicing Vehicles.

Vehicle Access, Visibility and Speed Control Measures

1. Due to insufficient visibility being demonstrated, the LHA would require the provision of speed bumps on Fishponds Road every 60 – 70m to control vehicle speeds. A drawing displaying the improvement should be submitted in support of the application. During a site visit vehicle passing the site were adjudged to be travelling at 20 – 30mph (although no speed survey has been undertaken).

The application demonstrates a visibility splay for vehicle speeds of **10mph** or 2.4m x 12.5m from the proposed site access (due to the presence of on-street parking). Manual for Streets Table 7.1 indicates that a visibility splay of 2.4m x 12.5m is only suitable for a vehicle speed of 10mph. Paragraph

7.5.8 of the Manual for Streets states that: *‘Below around 20m, shorter SSDs themselves will not achieve low vehicle speeds: speed-reducing features will be needed’*

Table 7.1 Derived SSDs for streets (figures rounded).

Speed	Kilometres per hour	16	20	24	25	30	32	40	45	48	50	60
	Miles per hour	10	12	15	16	19	20	25	28	30	31	37
SSD (metres)		9	12	15	16	20	22	31	36	40	43	56
SSD adjusted for bonnet length. See 7.6.4		11	14	17	18	23	25	33	39	43	45	59
Additional features will be needed to achieve low speeds												

- a) The consultants technical note does not address the LHA concern that there is limited visibility or the LHA observations that vehicle speeds exceed the 10mph visibility splay available (MfS). The LHA still require speed control measures.
 - b) The consultant’s technical note quotes Manual for Streets advice which states *“Parking in visibility splays in built-up areas is quite common...in some circumstances, **where vehicle speeds are low**, some encroachment may be acceptable”*. The consultant omits the sentence of Para 7.8.5 which states that *‘Ideally defined parking bays should be provided **outside the visibility splay**’*. The applicant has also not submitted any speed survey evidence which **demonstrates vehicle speeds are low**; the circumstance in which MfS advises encroachment of parking bays might be acceptable. The LHAs observed vehicles travelling at speeds exceeding 20mph past the site, suggesting the 10mph visibility splay is not suitable.
 - c) The consultants technical note also states: *‘It is also arguable that on-street parking acts as vehicle calming, meaning vehicles are likely to travel at lower speeds as a result’* and thus the consultant ignores the MfS advice which states *‘Below around 20m, shorter SSDs themselves will not achieve low vehicle speeds: speed-reducing features will be needed’*. Therefore, speed reducing features will still be required by the LHA.
2. The LHA require the vehicle barrier to be setback 5.5m from the back edge of the footway to ensure that vehicles do not block the footway whilst waiting for the barrier to open. If this cannot be achieved; then the LHA require agreement of a condition that the barrier shall be left open during hours of operation and only closed at nighttime.
- a) The consultants technical note response does not offer an improved gate setback as requested by the LHA on 18th June 2025.



Swept Path Analysis

3. The LHA require swept path analysis which demonstrates that the site can accommodate a 16.5m long articulated vehicle, although there does not appear to be suitable turning space within the site to accommodate a vehicle of this size. The LHA/LPA would have no control over use of 16.5m articulated vehicles on site and vehicles of this size are often used in association with B8 Warehousing land use.
 - a) The Technical Note response does not improve turning/loading space for a 16.5m articulated vehicle. The response does not address the possibility that a larger B2/B8 Warehouse could attract a different owner/user who would then have permission for B8 use with a 16.5m articulated lorry. The response states 'Despite the increase in floor area we are not increasing the intensification of the site. Access onsite by 16.5m long articulated vehicle is not currently required for the proposed development type'.
4. The application includes swept paths of a 10m long rigid lorry. The swept paths show there is not suitable turning space within the existing car park for delivery vehicles. A rigid lorry would need to reverse into the site to exit in a forward gear; or enter in a forward gear and then reverse out. These manoeuvres were not supervised/controlled by a qualified banksman.

Lorry Parking

5. The LHA require dedicated parking bays for lorries/vans on site. The site does not appear to have suitable capacity to accommodate a greater number of deliveries associated with a larger warehouse and increased no. of goods on site (or larger vehicles). On a site visit, two delivery vans were observed blocking the access and were required to reverse into the site. This is shown in the photo below:



6. Policy TB20 (Deliveries for Employment and Retail Use) of the Managing Development Delivery (MDD) Framework states that '*Planning permission will only be granted for commercial development proposals that demonstrate there is no significant impact on highway safety*'. The NPPF Para 117 states that: '*Applications for development should allow for the efficient delivery of goods, and access by service and emergency vehicles*'.

Car and Motorcycle Parking

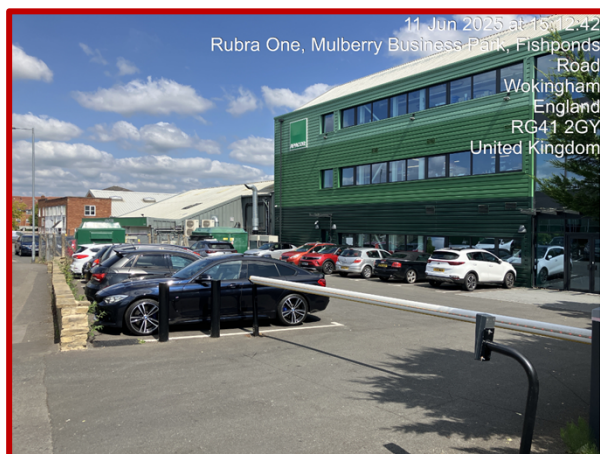
7. There is a shortfall in proposed number of car parking spaces when measured against the WBC Parking Standards for B2 Industrial Use. It has not been demonstrated that the site would prevent overspill of parked vehicles onto the surrounding roads. The parking requirement is assessed using the parking standards for B2 Industrial Use, given the permission would allow other B2 occupants/tenants in future who do not follow the same travel patterns as Apacor Ltd. The application documents state the parking level is sufficient on the basis of current staff numbers which is considered inappropriate justification; given planning permission does not apply to a specific organisation and the site could be occupied by B2 businesses with a differing level of parking demand.
8. Only 34 parking spaces are proposed on site. The additional 1100sq.m of B2 Industrial floorspace is required to provide an additional 27 car parking spaces, 5 cycle parking spaces and 2 motorcycle spaces, when the WBC Parking Standards are required. A total of 90 car spaces are required by WBC Parking Standards for 4,225sq.m of B2 Industrial Use. The WBC Parking Standard requirement is provided below:

WBC Parking Standards for the Sapphire Centre			
Use Class	Car Spaces	Cycle Spaces	Motorcycle (PTW)
B2 Use Class (1100sq.m)	25	5	2
B2 Use Class (4225sq.m)	90	21	5
B8 Use Class (1100sq.m)	14	5	2
B8 Use Class (4225sq.m)	30	21	5

- a) The additional response states only 170m² of additional floorspace is proposed. The application form states there is a net increase of 1,110sq.m of net additional floorspace. The LPA/Case Officer has measured the proposed 'passage', ground floor factory and first floor factory total

c.1100sq.m of additional B2/B8 floorspace and therefore the LHA remain of the view that the site could generate additional vehicle movements from staff, visitors and product deliveries. Therefore the LHA retains it's position regarding parking shortfall.

9. The existing car parking was observed to be fully occupied by existing staff during a site visit on 11th June 2025. Therefore, the LHA is concerned that the proposals do not provide car parking in accordance with the WBC Car Parking Standards, given an enlarged building could increase no. of staff and parking demand. Photos of car parking occupancy on 11th June 2025 are provided below:



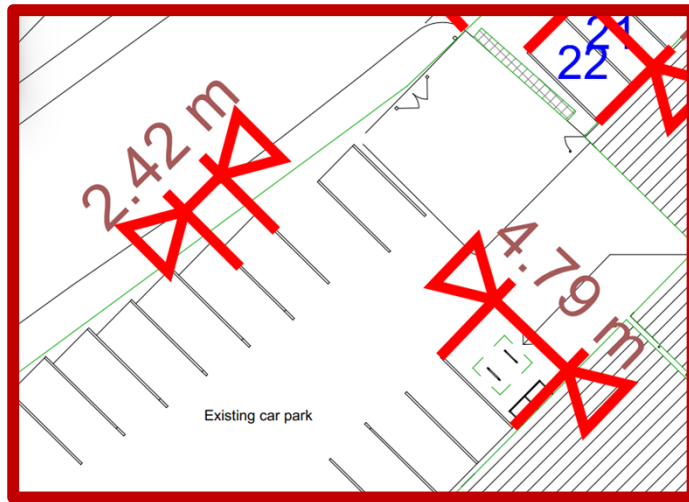
10. Furthermore, 7 of the proposed car parking spaces on the proposed site plan do not provide suitable manoeuvring space to ingress/egress each of the car parking spaces. The aisle only measures 2.62m wide which will not be sufficient to allow vehicles in and out. An aisle width of 6.0m would be required (As per paragraph 8.3.51 of Manual for Streets).

a) The Transport response note does not respond to the LHA's concerns regarding parking dimensions and layout.

11. The layout of these spaces also differs from the way they have been recently constructed on site.
12. A screenshot indicates this problem below. These spaces should be reconfigured otherwise they cannot be counted as useable parking spaces.

Aisle Manoeuvring Space)	Constructed Parking Layout

13. The spaces should be enlarged to 2.5m x 5.0m. The car parking spaces shown on the site plan measure 2.4m x 4.8m and do not appear to comply with the WBC Minimum Space standard of 2.5m x 5.0m, as is offered in the TS within Paragraph 4.5.6.



Trip Generation

14. The LHA would expect a more accurate forecast of trip generation to be completed based on more TRICS surveys of more closely comparable sites and a worst-case assessment of trip generation to be completed on the basis that staff numbers do increase with the expansion of the warehouse and operations.

a) *The Transport response note does not respond to the LHA's concerns regarding the trip generation forecast and TRICS Survey sites used.*

15. The LHA do not consider the TRICS survey sites comparable with the existing/proposed land use on site. The survey sites include industrial production facilities such as metal processing, energy recovery, thermal processing, sheet metal fabrication x2) and industrial glass production. No evidence has been offered which demonstrates these sites are comparable with the proposed Medical Diagnostics Supplies use in terms of the staff occupancy per 100sq.m or shift patterns/shift length (both of which would affect the no. of staff arrivals/departures and the timing throughout the day).
16. The LHA cannot accept the assertion that car parking demand and trip demand will not increase due to staff numbers remaining the same. Whilst this maybe the case in the short-term; planning permission is granted 'In Perpetuity' and it would be possible for Apacor Ltd to increase staff numbers in future; should the company experience growth and success. It is also possible for the building to be occupied by another company in the future who would be able to accommodate more than 50 staff within the larger proposed building envelope.
17. The TS states that: *'Apacor Ltd have confirmed that the staff numbers are unlikely to increase as part of the proposed extensions, with a maximum of 50 staff working on-site at any one time, this would mainly be the Sapphire Centre building with 2-3 staff in the warehouse. Based on a recent staff travel survey, it is likely that a total of 35 staff would travel to work by car,*

with the rest by other means and therefore the 34 spaces proposed is appropriate’.

- a. The staffing numbers in the Transport Statement are contradicted by a response dated 2nd July 2025 from the council’s Business Engagement Officer. The council’s Business Engagement Officer states the site may generate additional jobs (including apprenticeships) and that Apacor employ 70 people; rather than the 50 stated in the Transport Statement.

18. The TS goes onto state that ‘This approach confirms that operationally the level of car parking proposed is adequately catered for’ within the development site and would not result in a ‘increase in parking on the public highway’ in line with paragraph 0.2 of Appendix 2 of the WBC MDD’.

Cycle Parking

19. The TS states that a total of 14 cycle parking spaces are currently provided in the form of 7 Sheffield Type stands and this will remain for the proposed site. The TS states that although the size of the building is increasing; the number of staff is not and therefore the likely operations will not increase no. of cycle parking spaces required. The WBC Parking Standards require 21 cycle parking spaces for 4,225sq.m of B2 or B8 Industrial Use and therefore there is also a shortfall in cycle parking provision.

Recommendation

The LHA recommend refusal of the application due to intensification of an access with substandard visibility, poor car parking provision and poor delivery and servicing provision. The application is contrary to Wokingham Core Strategy Policy CP6, Policy CC07 of the Managing Development Framework, Policy TB20 of the Managing Development Delivery Framework and NPPF Paragraphs 115, 116 and 117.

Reason for Refusal: Visibility Splay at Existing Access

The existing access is at a point where the visibility is substandard due to the presence of on-street parking, and visibility cannot be provided in accordance with the Manual for Streets visibility standards for a 30mph road. No mitigation has been proposed to reduce vehicle speed and the lack of appropriate visibility at the intensified access junction would cause a highway safety problem which would create conflicts between vehicles and other highway users. Therefore, the development is contrary to Wokingham Core Strategy Policy CP6 and Paragraphs 115, 116 and 117 of the National Planning Policy Framework.

Reason for Refusal: Car Parking

The proposed development fails to provide a suitable number of car parking spaces in accordance with the adopted Wokingham Council Parking Standards. The development would lead to additional on-street car parking which would result in obstruction of footways, visibility splays, turning heads, access for emergency vehicles and/or block the freeflow of traffic to the detriment of Highway users’

safety. The development is contrary Wokingham Core Strategy Policy CP6 and NPPF Paragraphs 115, 116 and 117 of the National Planning Policy Framework.

Reason for Refusal: Cycle Parking

The proposed development fails to provide a suitable number of cycle parking spaces in accordance with the adopted Wokingham Council Parking Standards. The development would not provide suitable support for travel by sustainable travel modes. The development is contrary to the aims and objectives of the Wokingham Core Strategy Policy CP6 and NPPF Paragraphs 115, 116 and 117 of the National Planning Policy Framework.

Reason for Refusal: Deliveries and Servicing

The proposed development does not provide adequate parking, loading, unloading and manoeuvring space for delivery vehicles associated with B2 industrial and B8 Distribution uses. The proposals would result in delivery vehicles being stationed on the public highway or reversing onto the public highway to achieve ingress/egress to the site. The proposals are contrary to Core Policy CP6, Policy TB20 of the Wokingham MDD Framework and Paragraphs 116 and 117 of the NPPF.

Date	25th July 2025	Signed:	Ben Amey
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