



WOKINGHAM BOROUGH COUNCIL

TOWN & COUNTRY PLANNING ACT 1990

TOWN & COUNTRY PLANNING
(INQUIRIES PROCEDURE) (ENGLAND) RULES 2000 (As Amended)

Proof of Evidence

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APPELLANT:	Dandara Southern Ltd & Elstree Land Ltd
APPEAL SITE:	Land north of Reading Road, Arborfield
PROPOSAL:	Outline application for the proposed erection of up to 111 no. dwellings with associated works, parking, landscaping, publicly accessible open space and access from reading road. (all matters reserved except for means of access).
LPA REFERENCE:	243099
PINS REFERENCE:	APP/X0360/W/25/3371069

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1. **QUALIFICATIONS, EXPERIENCE AND SCOPE OF EVIDENCE**

- 1.1 My name is Alan John Lewis. I am the Highway Development Manager at Wokingham Borough Council (WBC). I am a Chartered Engineer (C. Eng) a Fellow of the Institute of Highway Engineers (FIHE) and a Chartered Member of the Institute of Logistics & Transport (CMILT).
- 1.2 I have nearly 40 years of experience working in the public and private sector, including appearing as an expert witness at numerous public hearings, inquiries and Examinations in Public both on behalf of planning authorities and applicants/developers.
- 1.3 I joined WBC in June 2023, having previously worked within the Borough for many years (primarily 1988-2000). I was closely involved in the development of the Core Strategy, Infrastructure Delivery Plan and a range of Supplementary Planning Documents (SPD).
- 1.4 I have led transport elements of the Local Plan Update (LPU), including testing of development allocations, phasing of infrastructure and viability, which all informed the LPU evidence base.
- 1.5 Whilst I was not involved in providing a consultation response in respect of the application, I know the site area well and have visited the site and its surrounds on several occasions to examine the proposals and potential mitigation options as part of my preparation. For this appeal, I represent the Highway Authority on related highway & transport matters, including accessibility which forms the basis of RfR 4, and the manner in which the appeal proposals would prejudice delivery of Loddon Valley Garden Village (LVGV) and the spatial strategy underpinning the emerging LPU.
- 1.6 The statements in this written proof of evidence (PoE) 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. APPLICATION & DETERMINATION

Application Consultation

- 2.1 My former colleague provided consultation responses on behalf of the highway authority over the months of December 2024 to March 2025, most requesting additional information relating to the development proposals.
- 2.2 Based on responses and additional information received, my former colleague recommended a number of planning obligations and a range of conditions.
- 2.3 When the application was determined, the highway authority's position in respect of the Strategic Transport Modelling was that: (39) *"...highways is content that the level of traffic from this proposed development would not have an adverse impact on the wider highway network."* However, as set out in greater detail below, this statement predates work to refine the initial phasing of the IDP and the viability assessment as part of the LPU.
- 2.4 There has been significant progress in the development of the LPU since this planning application was determined. There have been several planning applications submitted in respect of sites allocated within the LPU (as set out below). Additionally, the examining LPU Inspectors have considered the "strategic matters", including strategic transport, as part of Part 1 hearing sessions and were content for the hearing sessions to proceed to Stage 2 hearings. The LPU progress is set out in more detail in Ms Carter's PoE. The Highway Authority has, therefore, reviewed its position in light of these material changes in circumstance.

Application Decision

- 2.5 The Decision Notice is included at CD03.01, issued May 2025, supported by the Officer's Report at CD03.02. In summary it records 'no objection regarding highway safety' and expands on site accessibility. It acknowledges the site has 'good' access to current bus services.

2.6 As the Appellants had agreed to contributions towards bus services, I have not examined the detail of the 3 Leopard service. WBC has established at multiple appeals (including Blagrove Lane) that contributions towards bus services are reasonably related and necessary, falling outside of Community Infrastructure Levy.

2.7 My evidence focuses on Reason for Refusal (“RfR”) four, set out below:

4. Unsustainable location

The application site is within an unsustainable location that would not encourage a modal shift towards sustainable modes of transport, by reason of the countryside location outside of settlement limits, distances to facilities and services and poor quality of the local walking environment, contrary to policies CP1, CP2, CP3, CP6 and CP11 of the Core Strategy, Policies CC01 and CC02 of the MDD Local Plan, the Borough Design Guide SPD and section 8 & 9 of the NPPF.

3. SITE LOCATION & DESCRIPTION

- 3.1 The appeal site (“the Site”) comprises approximately 6.44 ha of land north of Reading Road. The site is bounded by Reading Road and Church Lane, generally encircled by trees and hedgerows forming the site boundary.
- 3.2 The appeal site was subject to an outline application with means of access determined.
- 3.3 The appeal scheme does not seek to fix any parameters, with the exception of the means of access to the site. Details of the proposed vehicular access points have been submitted for consideration. I anticipate that all means of access can be agreed as part of the Highways & Transport Statement of Common Ground (H&TSocG).
- 3.4 Where matters remain in dispute, I have examined these in my evidence. In the interests of proportionality, where there appears to me to be the potential to achieve agreement on remaining matters, I have addressed those matters on the basis these can be resolved but I reserve the right to propose rebuttal evidence if this becomes necessary.

4. POLICY BACKGROUND

Core Strategy

- 4.1 The statutory Development Plan for this appeal is the Wokingham Borough Council Core Strategy DPD (2010), the Managing Development Delivery (MDD) Local Plan (2014) and Arborfield and Barkham Neighbourhood Plan (ABNP).
- 4.2 Reference will be made to the following policies, relevant to the main issues in dispute, contained within the adopted Core Strategy adopted in January 2010:
- CP1 – Sustainable Development
 - CP3 – General Principles for Development
 - CP4 – Infrastructure requirements
 - CP6 – Managing Travel Demand
 - CP9 – Scale and Location of Development Proposals
- 4.3 Reference will be made to the following policies, relevant to the main issues in dispute, in the adopted Managing Development Delivery Local Plan:
- CC01 – Presumption in Favour of Sustainable Development
 - CC02 – Development Limits
 - CC03 – Green Infrastructure, Trees & Landscaping
 - CC09 – Development and Flood Risk
 - CC10 – Sustainable Drainage
 - TB08 – Open Space, sport and recreational facilities standards for residential development
 - TB12 – Employment Skills Plan
 - TB21 – Landscape Character
 - TB23 – Biodiversity & Development

Emerging Local Plan

- 4.4 Paragraph 49 of the NPPF allows authorities to “...*give weight to relevant policies in emerging plans according to... (a) the stage of preparation of the emerging plan...[and] the degree of consistency of the relevant policies in the emerging plan to this Framework.*”
- 4.5 The Site comprises parcels of land which were promoted by the landowners/developer for potential development as part of the emerging LPU.
- 4.6 The Housing and Economic Land Availability Assessment 2024 (“the HELAA”) considers the broad suitability, availability and deliverability of all promoted areas of land across the borough.
- 4.7 The HEELA concluded the land and adjoining parcels to the north-west of Arborfield Cross, would be excluded from further assessment as they are detached from the settlement boundary. The site has not therefore been included in the spatial strategy for development in the LPU and therefore remains within the countryside.
- 4.8 The emerging LPU policies relevant to the determination of this appeal are set out below:
- SS1 Sustainable development principles
 - SS2 Spatial strategy and settlement hierarchy
 - SS13 Loddon Valley Garden Village
 - SS14 Sites allocated for residential, including residential as part of mixed-use development
 - SS15 Securing Infrastructure
 - SS16 Safeguarded routes
 - C1 Active and sustainable transport and accessibility
 - C2 Mitigation of transport impacts and highway safety and design
 - C3 Active travel
 - DH1 Place making and quality design
 - HC1 Promoting healthy communities

- HC2: Community infrastructure
- HC7 Light Pollution
- HC9 Contaminated land and water

In my evidence, as part of the Council's case I will reference local and national policies, attributing weight in line with Paragraph 49 of the NPPF.

National Planning Policy Framework (NPPF)

4.9 I have attempted to initially paraphrase the following key policy tests relevant to the Reasons for Refusal, referencing relevant NPPF paragraphs as follows. I will then use this in my evidence when presenting the Council's Case in Section 5:

- 83 Distinguishing sustainable development in urban and rural areas;
- 89 Need for housing to meet local business and community needs, prioritising previously developed land (PDL);
- 96 Requirement to achieve healthy, inclusive and safe places;
- 105 Requirement to protect and enhance public rights of way and access;
- 109 Requirement to consider transport using a vision-led approach to identify transport solutions;
- 110 Requirement to actively manage patterns of growth;
- 115 Allocate developments to ensure sustainable transport modes are prioritised taking account of the local vision;
- 116 Development should only be refused if there is an unacceptable impact on highway safety or the residual cumulative impacts would be severe;
- 117 Development transport priorities; and
- 118 Use of Travel Plans to support vision-led assessments and ensure appropriate monitoring can ensure the vision can be achieved.

5. THE COUNCIL'S CASE

Decision

- 5.1 When coming to this decision the Council considered the site is unsustainable because:
- (a) It is not well located to access day-to-day needs using sustainable modes of transport.
 - (b) The distances required to access local facilities and amenities are too far to make the use of sustainable modes attractive.
 - (c) The routes available to walk or cycle to local facilities are limited or poor and would not encourage more sustainable forms of travel.
 - (d) The environment for walking and cycling to some public transport services, local facilities and amenities are not attractive or safe.
 - (e) The consequence of this will be an unacceptable level of dependency on the car, which is contrary to the Development Plan and NPPF, thereby failing to meet the definition of 'sustainable development.'
- 5.2 The Appellants Statement of Case highlights some inter-related issues with LVGV, what transport planners often define as Forecast Uncertainty. For the purpose of my PoE, I will focus on two scenarios:
- (A) The environment as it is today; and,
 - (B) After the appeal is determined, assuming it might be allowed, either:
 - i. Without LVGV; Or
 - ii. With a consent at LVGV
- 5.3 Focusing on Scenario A (5.3), I will first ignore the relationship of additional land uses and infrastructure potentially delivered by LVGV.
- 5.4 To inform Scenario B (5.4) I need also to consider how development at the Appeal site will affect the delivery of other development (LVGV), community land uses and associated infrastructure.

Reason for Refusal 4: Sustainability of the location

- 5.5 The Site lies within the countryside and is detached from Arborfield Cross. This conflicts with the spatial strategy of the Development Plan, which seeks to concentrate development in areas that ‘are or can be’ made sustainable through the provision of community or other infrastructure to support the day-to-day needs of future residents.
- 5.6 The consultation responses produced by my former colleague ahead of determination highlighted concerns that some of the journeys are unlikely to be made by active travel modes. The Officer Report therefore concludes that the occupiers of the proposed dwellings would be overly reliant on private motor vehicles, which would fail to deliver the desired modal shift away from the use of private motor vehicles.
- 5.7 Paragraph 89 of the NPPF recognises that if it is necessary to deliver sites in more rural areas, these should be sensitive to their surrounding and “exploit **any** opportunities to make the site more sustainable” [My emphasis].
- 5.8 Paragraph 109(e) of the NPPF advises that to deliver sustainable places, proposals should ‘identify’ and ‘pursue’ opportunities to deliver sustainable transport measures.
- 5.9 As I will show in more detail below, the distances to day-to-day facilities such as schools, shops, health services and community amenities remain well beyond the desirable walkable distances. Walking routes are poor and unattractive, lacking continuous footways, street lighting and safe crossing points; therefore, these fail to provide realistic alternatives to private car use for most trips.
- 5.10 It is beyond the scope of my evidence as to whether the development of this site is ‘needed’ to meet ‘local business or community needs.’ I acknowledge that the Appellant has sought to exploit additional opportunities to make the appeal site more sustainable. I also accept that opportunities to maximise sustainable transport solutions vary depending on location as such the

Appellants have proposed some measures to improve the sustainability of the site.

Scenario A - Accessibility

- 5.11 Consistent with NPPF (110) “The planning system should actively manage patterns of growth...”. Ultimately the NPPF requires the planning system to focus development “...on locations which **are or can be made sustainable**”, [My emphasis]. I believe it is a substantial part of the appellants case that the site can be made sustainable, once LVGV is delivered. Whilst I might understand this stance, that is not the position today.
- 5.12 As noted above the parties are working towards a H&TSO CG. Amongst other things this includes a list of land uses broadly within 5km and records walk/cycle distances and times.

Connectivity

- 5.13 Soon after the application was determined, the Department for Transport (DfT) launched the Beta version of ‘The Connectivity Score’. The site outputs are appended at Appendix 1 and accessibility criteria. The ‘Score’ is based on a generic mean (50) which varies compared to other areas and land-uses against percentiles in England. To simplify this, I qualified as ‘**well below**’, **slightly below** and **above average** recorded in Table 5.1.
- 5.14 Any judgement on a site’s accessibility is not binary; it is a balance of material considerations. The Connectivity Tool generates a ‘score’ intended to offer some measure of accessibility and assist transport planners to judge what improvements might address accessibility issues.

Table 5.1 – Connectivity Score Summary

Score Criteria	National Score (range or highest)	Balance
Overall	38-47	-
Public Transport	51	+
Walking	33	--
Cycling	58	+
Education (Except Driving)	41	-
Leisure (Except Driving)	43	-
Health	31	--
Shopping	37	-
Workplaces	51	+

5.15 The overall score for the appeal site currently varies from 38-47. I consider this to be below average for the Borough (13-81).

5.16 As a Beta tool, there is potentially some need to refine elements of the software package, which I expect the Appellants may not have access to. I

have therefore attempted to offer some balanced observations on the outputs, where appropriate expanding to explain my opinion.

- In the H&TSO_{CG} I have agreed the *current* bus services can be described as ‘good’.
- I disagree with the cycling connectivity score. Based on distances (1.7km), I agree there is great potential for cycling to Thames Valley Science Park (TVSP), but I am unconvinced the quality/safety of this route can be scored as high as the tool suggests, particularly over winter months.
- I agree the walking environment and accessibility is poor, a matter that I will expand on below.

5.17 As explored in the H&TSO_{CG} I believe improvements can be delivered to improve access to TVSP and Reading, but these represent minimal improvement under Scenario A.

5.18 Comparing accessibility using the Connectivity tool, I note most SDL developments in the Borough have achieved overall scores >60. Even the few pockets of development in the low 50’s, this score has occurred because it has proved unviable to deliver bus services close to homes. Offering some judgement for comparison (expanded in 5.5-5.8 below), I conclude the appeal site is below average.

5.19 Ultimately any ‘score’ is simply a measure of accessibility for future residents. Based on evidence of distance and willingness to walk, I consider the residents will be heavily reliant on motorised modes access to bus services (from Reading Road) to fulfil almost all day-to-day needs.

Active Travel

5.20 The National Design Guide (NDG) defines ‘a walkable distance to local facilities as “**no more than a 10 minute (800m radius).**” The appeal site is around 1km from the primary school and shop in Arborfield Cross.

- 5.21 Manual for Streets (MfS), clarifies (4.4.1) “*Walkable neighbourhoods are typically characterised by having a range of facilities **within** 10 minutes’ (up to about 800m) walking distance.... Which residents may access **comfortably** on foot.*” [My emphasis]
- 5.22 Sustrans suggests (Walkable Neighbourhoods), “...800m or approximately half a mile, is generally considered standard walking distance as it typically takes approximately 10 minutes to walk, and a 20 minute walking trip (1,600 total) has been found to be the **longest distances a majority of people are willing** to walk to meet their daily needs.” [my emphasis].
- 5.23 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.’
- 5.24 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, reproduced as Table 5.2

Table 5.2 – Providing for Journeys on Foot

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

- 5.25 Table 5.2 suggests that 800m is an ‘acceptable’ walking distance for locations outside of town centres, for journeys other than commuting or travelling to school. In my opinion, the reason commuting and school travel are considered differently is because these can be considered one-way trips (for a longer period) whereas others will be considered two-way (to the shop and back).

- 5.26 The reason such distances are consistent across guidance is because overwhelming evidence confirms the willingness to walk is over-stated. Whilst we might like people to adopt healthy sustainable travel choices, unfortunately they do not.
- 5.27 Sustrans do not expand on the context of this statement, should we assume that 1.6km is the longest distance the majority of people would walk? 'How far do people walk?' is a paper that supported a Transport Practitioners' Meeting in 2015. It examines the detail of data from the National Travel Survey (NTS) then, reproduced below at Table 5.3 and appears to put this in better context:

Table 5.3 – How Far Do People Walk (UK, excluding London)

	Mean (m)	85%ile (m)
As a main mode of travel	1150	1950
Walk to a bus stop	580	800
Walk to a Railway station	1010	1610

- 5.28 Assuming the NTS data follows a traditional bell-curve, the statistical difference between the mean and 85th percentile distances will be 'two standard deviations' of the data range. The 15th percentile distance, the distance the vast majority of people will actually walk, will therefore the difference between them – summarised in Table 5.4.

Table 5.4 – How Far Do People Walk, Derived 15%ile Walk Distances

	Mean (m)	15%ile (m) [Mean - (85%ile - mean)]
As a main mode of travel	1150	1150 - (1950-1150) = 350
Walk to a bus stop	580	580 - (800-580) = 360
Walk to a Railway station	1010	1010 - (1610-1010) = 410

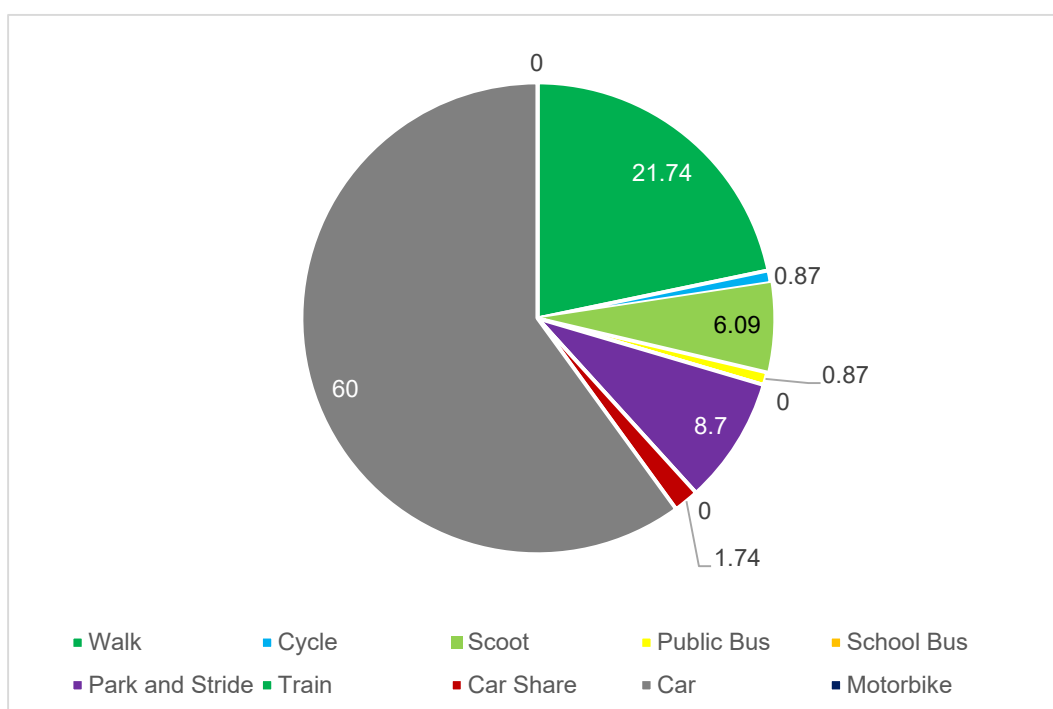
- 5.29 Unfortunately the National Travel Survey ([CW304](#), Usual time spent walking per day, by purpose and time interval) reveals that 65.4% of people walk for leisure but only 44.1% actively walk for a journey purpose (NTS'23). This is because a very small proportion ([CW303](#), Wokingham Borough) walk more

than 10 minutes, helping to lift the average who do not or scarcely walk at all:

- 5.6% At least once per month
- 5.5% At least once per week
- 5.3% At least 3 times per week
- 4.9% At least 5 times per week

- 5.30 As noted above travel choices can support much longer walk or even cycle trips, but the return journey is a key determinant when understanding willingness to walk or cycle. When making a travel choice, a person walking to work, and not returning for 5-9 hours later, will consider the mode choice differently to someone escorting their child to school, before walking home.
- 5.31 To support this view, Figure 5.1 provides mode shares for school travel at Coombes School, Arborfield Cross. For a school, with around 370 pupils, 22% suggests around 80 walk to school. This almost perfectly matches the number of primary school children living in Arborfield Cross. Whilst it highlights the school has had some success in 'park & stride' it illustrates that around 70% of pupils travel to/from school by car.

Figure 5.1– Travel Plan mode shares for Coombes School, Arborfield



5.32 Based on the H&TSO CG I believe we can conclude the Recreation Ground is the only facility within 800m of the site. Even (The Bull) Pub and (Clip N' Climb) Climbing centre are marginally over 800m. Given the nature of these facilities most residents would walk to these uses, but I consider few other trips would occur on foot, because return distance becomes more significant for the nursery, primary school and shop trips (potentially accessible >1km).

5.33 In my opinion, it is entirely correct that the planning system should encourage people to walk more to support healthier lifestyles and plan for networks that are more attractive for people to walk to everyday facilities, the evidence is clear that sustainable development locations are those 'that are

or can be' made more accessible to a range of facilities to reduce the need for motorised journeys.

- 5.34 The H&TSoCG might offer some improvements to the footway network, reducing vehicle speeds on Reading Road, the pedestrian environment is not attractive. Most of Reading Road is between 5.7-6.7m wide (typically 6.1m, acceptable for buses around 30mph) with a roadside footway of around 1.5m.



- 5.35 As illustrated below the proximity of boundaries on one side and large vehicles on the other, can affect pedestrian amenity on the adjacent footway. The combination of environment either reduces the effective width of the footway (leading to single-file walking behaviours) or increasing pressure to reduce speeds and/or increase separation which can increase the urbanising effects on the street.

5.36 Based on distance alone, I believe there are few facilities within walking distance. It may be reasonable to conclude most local services would be within an acceptable cycling distance, however the following key points from Figure 4-1, Local Transport Note 1/20, satisfies me there is no direct and continuous cycling route to the local facilities.

- Mixed Traffic (on-road cycling) provision suitable for:
 - most people when traffic flows <2,500 vehicles per day (vpd) and speeds <20mph;
 - some people when traffic flows between 2,500-4,000 vpd and speeds <20mph;
 - some people when traffic flows <2,500vpd and speeds <30mph;

5.37 The PROWIP does offer the potential to upgrade the Footpath via Church Road which could connect to TVSP and Cutbush Lane. However, until LVGV is reasonably advanced, this cannot be relied upon. Therefore, I believe the appeal proposals must connect the site to facilities (secondary schools) at Arborfield Green or Shinfield.

Scenario A - Accessibility Summary

5.38 At the time of writing, I expect to agree distances to facilities, in the H&TSO CG. This will ensure the Inquiry has a factual account of distances to apply judgement to the willingness to walk or cycle and how attractive this might be, relative to other travel choices.

5.39 I have worked with the appellants to agree distances to facilities and services. Having established that the 'majority of people' walk is around 400m, I consider that few of the facilities would serve the day-to-day needs of future residents of the appeal site.

5.40 I might be optimistic that the appellants efforts to address pedestrian amenity but widening of footway infrastructure on Reading Road will offer limited

improvement to the distances to facilities. Unfortunately, these works will also rely on narrowing the road, worsening conditions for bikes and buses.

- 5.41 I have endeavoured to agree potential improvements to the PROWIP to upgrade Footpath (Arb01) to a Bridleway/Cycle Track to support cycle travel via Church Lane to access the (TVSP) employment area.
- 5.42 The appellants have worked to exploit the potential from existing bus services, and I agree these will provide some betterment for existing and future residents.
- 5.43 I consider the mitigation options being offered are quite minimal. They respond to existing conditions to achieve a safe means of access for the appeal site and address some of the immediate and localised issues for active travel, comprising of:
- (a) Additional islands, to convert existing priority-working islands to chicanes, with the aim these will reduce Reading Road speeds to around 37mph (in the 30mph limit) to support the vehicular access of the appeal site;
 - (b) Changes to Church Lane to assist with a pedestrian (and possibly) cycle access of the appeal site;
 - (c) Bus stop improvements, adjacent the site;
 - (d) Footway improvements along Reading Road, to help connect residents to Arborfield Cross;
 - (e) Replacement stile on footpath (PROW, Arb01) to make it possible for cyclists to use this route.
- 5.44 As noted above this section attempts to differentiate between scenarios A and B. In Section below, I will explore Scenario B, with LVGV.

Scenario B – With Loddon Valley Garden Village

- 5.45 As identified above, the Appellants Statement of Case seems to rely on some elements of LVGV but, in my opinion, seeks to conflate development and infrastructure issues, choosing to rely on those elements that support the appeal case, and ignore those that do not.
- 5.46 In this section, I seek to assist the Inquiry by exploring the background to the LPU, to help inform the community land uses and infrastructure that are integral to proposals to help explain the risk of harm that would arise by changing the plan.
- 5.47 I do not dispute that LVGV will provide an array of land uses will help improve the accessibility at the appeal site. Indeed, it should also deliver some infrastructure and services that will improve sustainability of the appeal site. However, the delivery of LVGV relies on a complex inter-relationship of development values being achieved to fund and deliver infrastructure to support it. Without one it is impractical to rely on the other.
- 5.48 The LPU has been developed exploring viability and delivery, because a key component of the LVGV allocation is the delivery of new road bridges over the River Loddon and M4.
- 5.49 Appropriate to the stage in planning, the LPU evidence has explored an interim position (2032) establishing that interim improvements would be sufficient to preserve broadly acceptable traffic conditions, enabling development of up to 800 homes and 40,000m² of employment at LVGV.
- 5.50 Once complete, these bridges and other infrastructure will enable the delivery of over 3,000 further homes and around 40,000m² of employment. However, to deliver this infrastructure, viability necessitates some development is completed before.
- 5.51 To allow the appeal development would weaken the balance achievable between development and infrastructure. Critically, it will increase levels of

congestion on the approach to the Black Boy roundabout and weaken the transport 'vision'.

- 5.52 For the purposes of my evidence, I will briefly record the material change in circumstances since the application was determined to demonstrate how prejudicial the Appeal development would be.

Material Change

- 5.53 The LPU sets out the council's long term development strategy for the borough in the period up to 2040. Part of the LPU vision is to create a sustainable village development close to Reading.
- 5.54 The LPU was submitted to the Secretary of State in February 2025, with subsequent stages set out in Table 5.5 below:

Table 5.5: LPU Timetable

LPU key milestone	Date
Submission to Secretary of State	28 February 2025
Inspectors appointed to hold independent examination	6 March 2025
Receipt of Initial Questions from Inspectors	17 April 2025
WBC response to Inspectors Initial Questions	18 June 2025
Receipt of Inspectors Matters, Issues and Questions (MIQs) for Part 1	3 October 2025
WBC publish Regulation 24 notice of hearing sessions	5 October 2025
WBC response to Inspectors MIQs	3 November 2025
Part 1 Hearing Sessions	18 November 2025 – 21 November 2025
WBC response to key actions following Part 1 Hearing Sessions	1 December 2025; 17 December 2025
Receipt of Inspectors' Part 1 Post Hearings Letter	18 December 2025

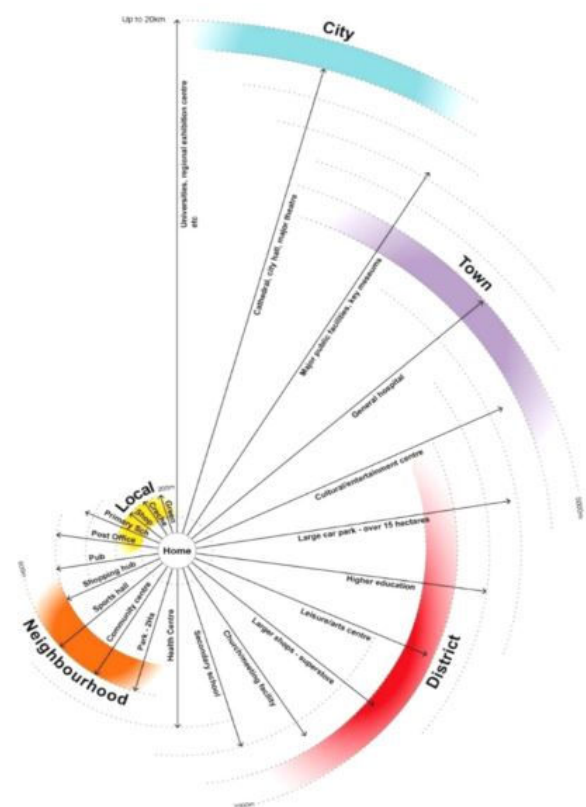
- 5.55 When determining the appeal application (May 2025), the Council considered it could only give limited weight to the LPU and supporting evidence. As such, prejudice was not specifically identified in the reasons for refusal. Since then, the position has changed. In my view (which is informed by the views of Ms Carter), greater weight can now be placed on the LPU.

- 5.56 To understand some of the complexity and inter-relationship of issues for this appeal, I will need to explain a little about the elements of the current and emerging Spatial Plan. Then, I will expand on proposals to support planned development and infrastructure, so I can demonstrate why unplanned (appeal) developments risks compromising those plans.
- 5.57 As stated above, I recognise the inter-relationships of development and infrastructure are complex. Indeed, I believe they have contributed to the Planning & Infrastructure Bill.
- 5.58 In my opinion, these relationships bear some relationship to the pressures for Public Inquiries in the UK, because these frequently identify 'lessons learned'. But when other Inquiries draw similar conclusions, the public want more Inquiries to identify who is not learning these lessons, why they are not being applied and what can we do to change UK Governance to prevent recurrences.

Spatial Strategy

- 5.59 Before the turn of the Millenium the Urban Taskforce developed the conceptual town planning relationship, known as 'pyramids of intensity', illustrated right. The intension was to support spatial strategies to help improve accessibility to meet travel needs at a range of levels:

- (a) Local
- (b) Neighbourhood <800m
- (c) District <2km
- (d) Town <5km
- (e) City <20km



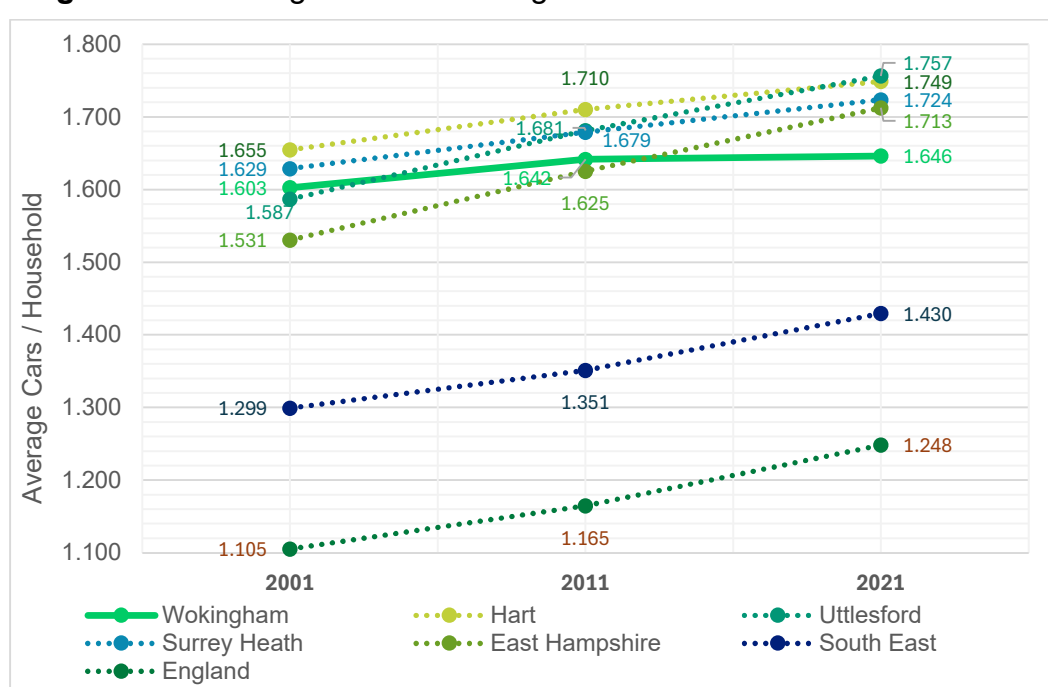
- 5.60 Embracing this conceptual relationship, the Wokingham Core Strategy directed development towards Sustainable Development Locations (SDLs) expanding or creating new settlements to deliver community facilities largely within 800m.
- 5.61 Through the Core Strategy, development was distributed across the Borough. Focusing on land use accessibility and transport, I have highlighted the key development objectives across the four SDL's each helping to meet the spatial needs of the Borough:
- (a) South of M4 SDL – urban extensions of villages to the west of the Borough delivering primary school(s), local centre, bus corridor and, in conjunction with the TVSP, delivery of the A327 Eastern Relief Road (ERR).
 - (b) Arborfield Green SDL – creation of a new village (on former Military Barracks), including new primary/secondary schools, leisure facilities and shops (incl. a District Centre).
 - (c) North Wokingham SDL – urban extension including a primary school, local centre and Wokingham North Wokingham Distributor Road (NWDR) to enable regeneration of parts of the town centre by reducing pressure on town centre network.
 - (d) South Wokingham SDL – urban extension including primary school(s), local centre and Wokingham South Wokingham Distributor Road (SWDR) to enable regeneration of parts of the town centre by reducing pressure on town centre network.
- 5.62 The key part of the spatial strategy that is nearing completion was to manage SDL delivery, through development and infrastructure. Together these sought to reduce traffic demand into and through Wokingham Town Centre, by providing community facilities elsewhere. Critically, Arborfield Green would create a new secondary school and district centre, redistributing some travel demands from the south of the Borough (typically from Finchampstead) to a new centre, thereby alleviating some pressures on routes into Wokingham and thereby enabling development and new

infrastructure to advance. Unfortunately, some delays did occur and some of the benefits are yet to be fully realised.

Spatial Challenges & Opportunities

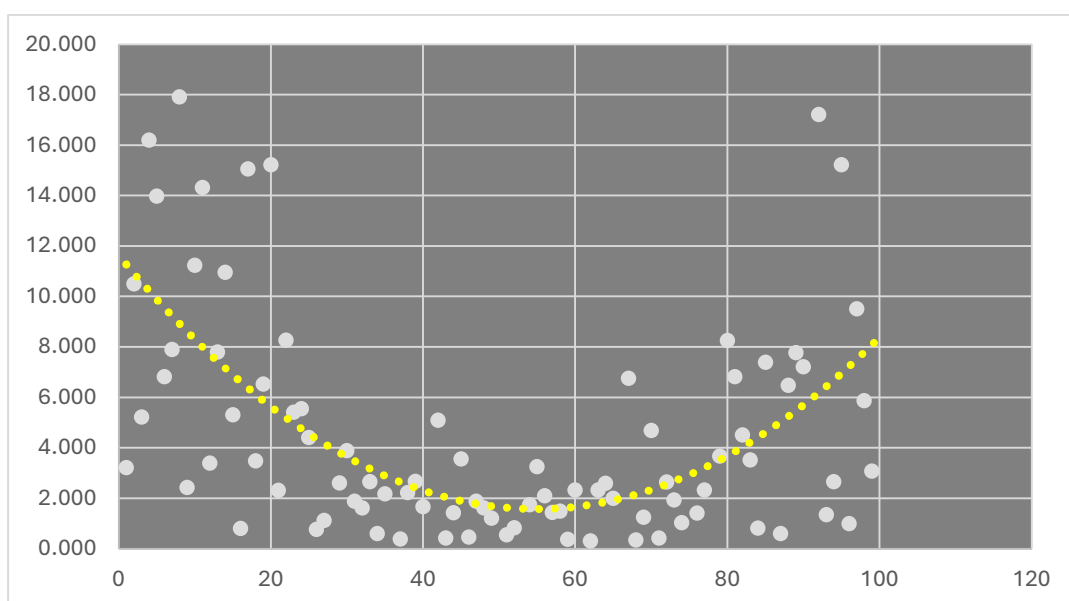
- 5.63 Over the Core Strategy, WBC learned many lessons, making good progress in some areas and less in others. Figure 5.2 illustrates how the Borough's spatial planning focus has translated into progress managing private car travel (to CP6).

Figure 5.2– Average Cars / Dwelling



- 5.64 Notably, car access has continued to increase across much of the UK, but in the Borough, this has been <3% in two decades, much better than other high car owning authorities, and much lower than the 10-13% in the southeast and England respectively. Wokingham was the **third highest** car owning authority in the UK; now it is **eighth**.
- 5.65 Supporting the planned update of the Council's Parking Standards, WBC has examined the relationship of car ownership and population density, depicted in Figure 5.3 below.

Figure 5.3– WBC Car Density by Ward (2021 Census)



- 5.66 Reinforcing the ‘pyramids of intensity’ relationship, WBC has established that delivering developments with a population density broadly between 47-63 persons/Ha has effectively reduces car ownership and use. A relationship that is also evident from ‘[My Journey](#)’ surveys of sustainable modes of travel [A Borough wide Travel Plan]
- 5.67 Amongst the lessons learned, the SDLs have highlighted some limitations of poly-centric settlements, now captured in Paragraph 83 of the NPPF (“...*development in one village may support services in a village nearby*”). This has also established that the delivery of community land uses has garnered wide support, but it also polarised opinions on delivery:
- (a) Deliver community land uses too early, and they attract travel demands away from existing to new facilities, weakening the viability of existing facilities and generating more car travel than they reduce; AND/OR,
 - (b) Deliver Community land-uses too late, and travel habits become established and they become harder to change.
- 5.68 Consistent with Paragraphs 20 and 77 of the NPPF (“The supply of large numbers of new homes can often be **best** achieved [by]...planning for larger scale development...supported by the necessary infrastructure and

facilities....” [My emphasis]) WBC has developed an LPU including the delivery of a Garden Village near Reading – one of the largest conurbations in the sub-region.

5.69 The common challenge with major conurbations is they will offer greater potential for sustainable travel, but the opportunities must carefully balance the constraints. Building on lessons learned there are two inter-related town and transport planning approaches that will deliver sustainable development:

- Firstly, through the regeneration of core areas with high-rise development to deliver ‘pyramids of intensity’ [which exploit sustainable travel in core areas];
- Secondly, to create a series of ‘hubs’ at the urban edge, increasing priority for non-car modes along ‘spokes’ into the conurbation to induce mode shift [delivering transport hubs & spokes, effectively supporting mode shift].

5.70 Reading and Wokingham Borough Councils have worked on their respective Local Plans building on complementary spatial strategies, seeking to preserve and enhance the existing environment. Together the Councils have delivered new and improved railway stations as well as park & ride (P&R) sites around the urban edge. By constraining traffic capacity around the urban edge (typically M4, railway and river crossings), this strategy helps maximise the potential for mode shift at the edges of the urban area.

5.71 Consequently, significant parts of the existing road network in/around Reading are therefore at or approaching capacity, with associated levels of congestion and delay. Adding development around Reading, still offers good potential for sustainable travel into Reading, but requires proposals to enable sustainable travel choices to bypass areas of acute congestion.

5.72 Consistent with its statutory duty ([S30](#) Town & Country Planning Act) to complete a ‘survey’ of needs, the Council has developed robust and credible evidence to deliver both development and infrastructure, to meet the needs of current and future generations.

- 5.73 To deliver a 'sound' plan, WBC is obliged to learn from both Government¹ professional² and its own experience, to avoid negative consequences and work hard to achieve the 'vision' both it, central Government and communities expect it to achieve.
- 5.74 As the appeal site might opportunistically grab some of the land use and infrastructure benefits of LVGV, without contributing to the solution. I need to expand how these are inter-related and identify the risks of harm.

LPU & Garden Village

- 5.75 The LPU is currently at the second round of hearings. It seeks to build on the successes of the Core Strategy, applying lessons learned and deliver much needed sustainable development in the Borough.
- 5.76 Proposals for Loddon Valley Garden Village (LVGV) embrace constraints as opportunities, crucially:

- (a) Deliver much needed housing development in a location that can provide an array of community facilities to meet most day-to-day needs, including, building on the 20 minute neighbourhood principles:

- (i) Primary/secondary schools;
- (ii) District Centre;
- (iii) Health Centre;
- (iv) Additional employment, through the expansion of TVSP;



- (b) Expand the PROW network to deliver or create new opportunities for cycle connections between Reading and Wokingham (with further connections to other villages);

¹ Garen Cities, towns and villages, Parliament 2017

² Understanding Garden Villages, Town & Country Planning Association (TCPA), 2018

- (c) Exploit opportunities from Cutbush Lane (M4) bridge, for sustainable transport;
 - (d) Exploit remaining opportunities along the A327 corridor to preserve network conditions in the short-term;
 - (e) Utilising flood risk land to create SANG, and deliver new roads over the flood-plain and M4:
 - (i) reducing the effects of climate change on the existing road network (A327 & A329); and,
 - (ii) delivering much needed network capacity to help redistribute existing trips away from congested areas.
- 5.77 The proposals at LVGV offer a new self-contained village at the urban edge of Reading. Once complete, these proposals will offer a range of community facilities, to meet most day-to-day needs locally. It will also concentrate that community around a new District Centre in the village (a transport hub), maximising the potential for bus travel and improving the cycle network within it and neighbouring areas.
- 5.78 Figure 5.4 overleaf shows the three developer/promoters who form part of LVGV consortia. The proposals are being submitted under a single masterplan, as three planning applications; two of which have been registered and a third is expected shortly.
- 5.79 The Hatch Farm proposals will include a new link road between Mill Lane and Hatch Farm Way, effectively replacing the narrow section of Mill Lane over the River Loddon at the Moat House.
- 5.80 Together the LVGV Masterplan (Figure 5.5 refers) will create a parallel route to the B3030 Mole Road, helping spread traffic across the wider network to make best use of the new bridges and reduce pressures in Arborfield Cross, Sindlesham and into and through Winnersh.

Figure 5.4– LVGV Land Ownership

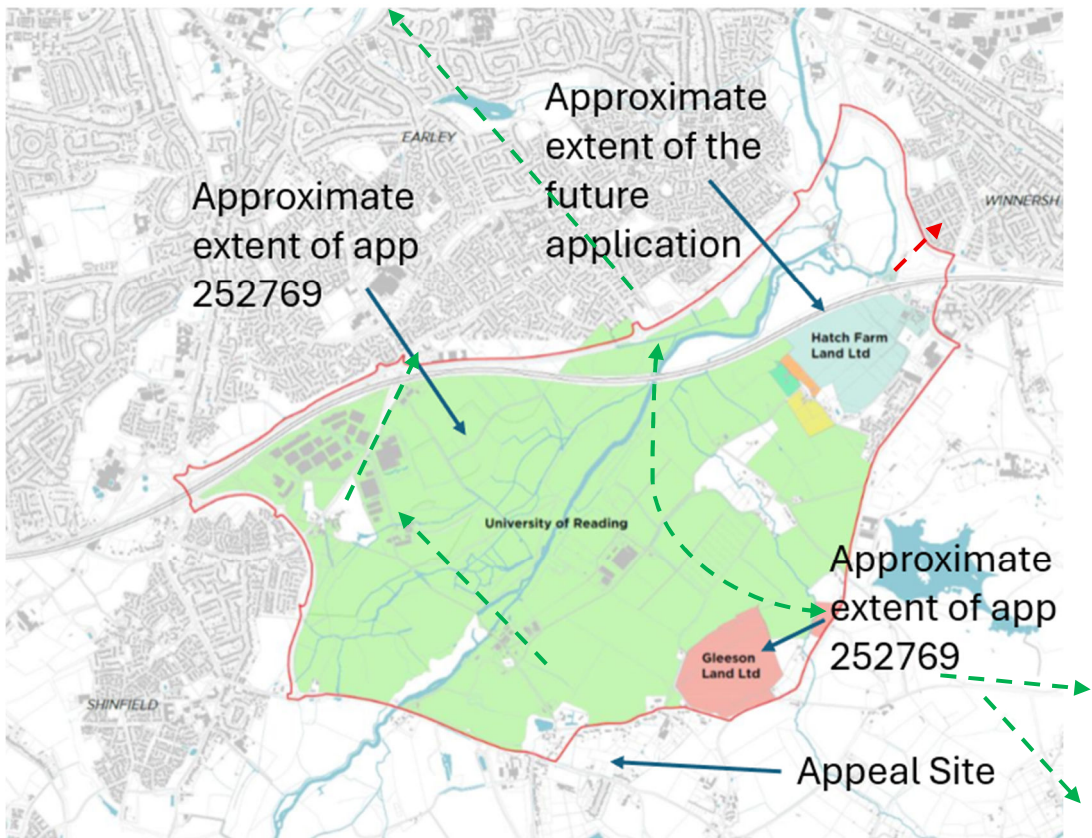
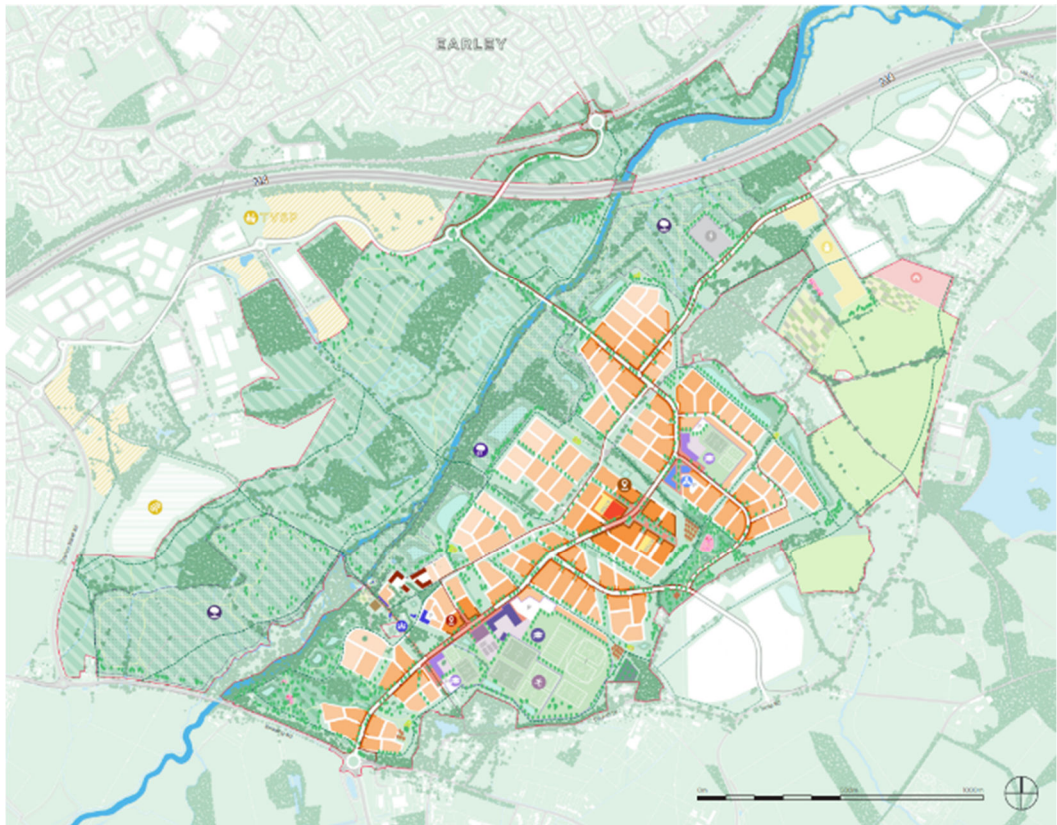


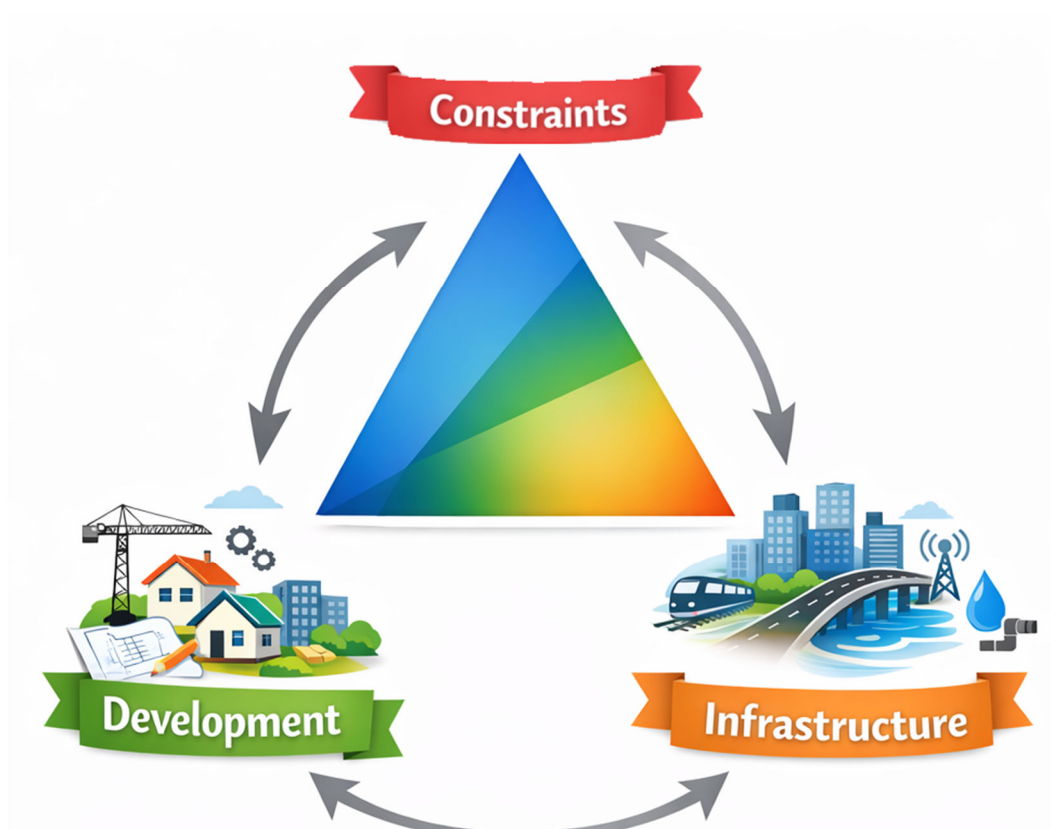
Figure 5.5– Illustrative Masterplan (Savills)



Understanding the Development & Infrastructure Balance

- 5.81 The LVGV proposals are central to the emerging LPU. It represents the largest and most strategically consequential allocation in the LPU. Its purpose is not simply to accommodate housing need – it is a Garden Village designed as a comprehensive, infrastructure-led new community whose viability and success depends on a carefully managed sequence of development, transport improvements and the delivery of services, facilities and sustainable travel solutions.
- 5.82 Figure 5.6 depicts how one can work within (capacity) constraints of the network to deliver a balance between Development and Infrastructure. The question the Inquiry needs to consider is whether the appeal proposal would interfere with that balance and how it will affect planned delivery. It is therefore necessary to consider both the current status of the LPU examination and the degree of progress toward LVGV delivery.

Figure 5.6 – Development & Infrastructure Balance



5.83 Consistent with this vision, WBC and the LVGV applicants have worked extensively to develop evidence and plans to achieve a deliverable balance within the constraints.

5.84 Significantly, WBC has developed its LPU evidence, working to refine the phased delivery of development and infrastructure. To deliver these new bridges over the River Loddon and M4 (costing £10M's) to enable opening around 2032. the evidence considers:

- a) An interim design year of 2032 with some development and some infrastructure improvements (explored further in 5.8 below)
- b) A significant part of these emerging plans includes *interim* improvements to the A327 corridor ahead of the delivery of new River Loddon and M4 bridges.
- c) This evidence supports plans for up to 800 dwellings at LVGV, with proportionate scales of housing delivery at other sites in the sub-region, including:
- d) 130 dwellings at Land north of Arborfield Road, Shinfield
- e) 140 dwelling at Land east and west of Hyde End Road, Shinfield
- f) 81 dwellings at Land west of Trowes Lane, Swallowfield (allowed on appeal)
- g) 180 dwellings at Blagrove Lane, Wokingham

LVGV Application

5.85 Working towards a deliverable balance the LVGV consortia have raised concerns over development viability, particularly in terms of infrastructure costs. It is my understanding, that WBC has accepted viability concerns and is working with the applicants to find a reasonable balance, against NPPF115.

5.86 As a significant element of the infrastructure package relates to internal roads through the site, with new bridges over the River and M4, WBC has constructively engaged on the basis that the LVGV application will be subject to a S106 Agreement, instead of using the Community Infrastructure Levy (CIL).

- 5.87 To inform the indicative infrastructure phasing, Appendix M of the LVGV Transport Assessment (TA, June 2025) includes an outline of the development and infrastructure phases. As this work continues to advance, it is envisaged that the legal agreement will specifically identify development and infrastructure triggers (e.g. J11, M4 – See SoCG with National Highways) aligned with a scale of development; thereby ensuring the timely delivery of one alongside another.
- 5.88 The LVGV application now supplements the LPU evidence, amongst other things, the application identifies the following mode shares (reproduced as Table 5.6). Whilst the application is at consultation stage, plans continue to evolve to frame the infrastructure necessary to achieve the ‘vision’.

Table 5.6 - LVGV Target Mode Shares

Mode	Mode Share	
	Internal	External
Walk	61%	1%
Cycle	2%	2%
Public Transport	2%	6%
Car Driver	23%	70%
Car Passenger	12%	21%
Total	100%	100%

- 5.89 The following captures typical ‘journey to work’ data from 2021 Census data, for surrounding areas, illustrating how the mode share targets above are both realistic and challenging:
- Walk 3-4%
 - Cycle, 1-2%
 - Bus, 2-3%
 - Train, 1-3%
- 5.90 Responding to these challenges, the LVGV applicants continue to refine initial phases of development and infrastructure delivery, exploring how best to achieve the target mode shares. In a similar timescale (by 2032), LVGV is

likely to deliver community land uses (Local Centre, Primary School and Health Centre) alongside proportionate scales of housing and employment development.

5.91 The Framework Travel Plan has also begun to expand a series of additional obligations to influence travel choices (e.g. Bus ‘taster’ tickets and cycle purchase vouchers).

5.92 If LVGV is to achieve this ‘vision’, supporting infrastructure and bus services must be delivered. At the time of writing, the emerging package of measures could be broadly described as follows:

- Upgrade of (PROW Arb01) from Footpath to shared use foot/cycleway (to Phase 1), including works to Cutbush Lane;
- New crossing of B3030 Mole Road at Ellis Hill, to link existing elements of the cycle (& PROW) network between Lower Early and Barkham;
- Changes to the current bus services (explained in Section 9 of the LVGV TA), increasing the number of buses on existing routes and diverting some into the development (to improve accessibility, around year 2 or 3)
- Interim Improvements to Black Boy Roundabout (Appendix 2 refers) are expected to broadly preserve conditions and enable some development to advance ahead of other infrastructure.

5.93 The interim works identified form part of a wider package of measures, mitigating the (interim development) effects on the A327 corridor. Whilst the Council’s IDP identifies a higher cost, the LVGV applicants have estimated these works over £0.8M.

5.94 The above outlines the planning obligations associated with the (interim) mitigation for 800 dwellings and 40,000m² of employment, ahead of new roads and bridges.

5.95 At a strategic level, the Council’s LPU evidence considers the threshold when the cumulative residual effects would be ‘severe’ is around 2 minutes

of delay. The strategic traffic modelling for the LVGV applicant's forecast (Appendix 3, which applies higher levels of internalisation than WBC believes is realistic) reveals that traffic delays at the improved Black Boy roundabout will be <2minutes delay at this junction.

- 5.96 At the application stage, the LinSIG junction assessment provided at Appendix Q of the LVGV TA, suggests the improved junction arrangement will provide a Practical Reserve Capacity (PRC) of 2.6% - marginally under capacity.
- 5.97 The LinSIG assessment does record some excess queues within the junction, but the TA summarises mean maximum queues (on the circulatory elements of the junction) as 7-13 vehicles. Unfortunately, this is not a *validated* base junction model and appears to under-represent junction queues and delays.
- 5.98 From my examination of the junction assessment results, I note the available queuing space available is between 6-9 vehicles in these areas, thus traffic within the roundabout will block entry/exits, as such the junction would 'lock-up' with much greater levels of congestion and delay.
- 5.99 At this stage I am broadly content that the average delay can be kept below 2 minutes. But to identify a deliverable package of obligations, WBC will need to work with the LVGV applicants to fix obligations and delivery triggers – e.g.:
- Phase A of the Infrastructure Package (Interim A327 works) to be complete before X occupation;
 - Phase B of the Infrastructure Package (River Loddon & M4 bridge) to be complete before Y occupation.
- 5.100 Responding to the network (capacity) the (LVGV) development constraints is likely to deliver an interim mitigation package, before delivering significantly more infrastructure (roads & bridges).

- 5.101 The appeal proposal is for up to 111 dwellings, where on top of CIL the appellants are contemplating minor access improvement works and rely on development and infrastructure that should be delivered by LVGV: Materially altering the balance, viability and delivery.

A327 Corridor & Appeal Site

- 5.102 At 5.4.41 I outline how the interim assessment could support development of around 1,330 dwellings on the A327 corridor. If unplanned development were allowed, the level of queues and delays would be materially worse, and the cumulative residual effects would become severe.
- 5.103 For the LVGV proposals to achieve the ‘vision’ it must deliver a combination of community land-uses alongside scales of development, with an appropriate package of infrastructure (as illustrated in Figure 5.6).

Without LVGV

- 5.104 Exploring **Scenario B**, I have tried to proportionately outline below the risk and harm which I firmly believe would prejudice delivery of LVGV.
- 5.105 Figure 5.7 overleaf illustrates a 10-minute period within the weekday AM peak hour (2026). It shows that congestion sometimes extends to the bus priority (by the pub). As consented and planned developments advance in the future, I am content that LPU ‘reference case’ modelling shows queues will occur throughout the peak hour, which would affect bus journey time reliability.
- 5.106 As the constraints on the A327 corridor take effect, congestion and delay will extend further down Hollow Lane, where:
- Queues on Hollow Lane would extend beyond the bus priority, resulting in buses becoming caught in the same congestion as other traffic – adversely affecting bus journey times and bus/car mode shares; and/or



- As queues on the Hollow Lane approach affect bus priority it might be necessary to offer more green time to this arm of the junction, to preserve bus priority. However, doing so would reduce the volume of traffic (from Hyde End Lane) thus increasing the congestion on this approach (with the same effect on buses) but also adversely affecting active travel and community severance in Shinfield.

Figure 5.7– 2026 AM Peak Congestion & Delay (Google –Traffic)



- 5.107 Significantly, the appeal site currently benefits from 4bph to Reading. The adjacent buses have a timetable journey time of 31 minutes (off-peak) and 38 minutes (peak).
- 5.108 Without LVGV and the A327 interim works, bus journey times and service reliability will worsen. To address this, it will be necessary to operate

additional buses (vehicles) to preserve similar frequencies, having a greater effect on service viability.

- 5.109 The Appeal site would not be supported with many of the community land uses that are planned for LVGV and much of the cycle infrastructure will not be delivered. Consequently, the appeal site will become more reliant on car travel – thereby adding to the cumulative residual effects.

With LVGV

- 5.110 The LVGV proposals include a bus strategy detailed in Section 9 of the submitted TA, which will vary existing services to deliver high-frequency services to the planned development. Given the proportion of homes served, I expect services on Reading Road, through Arborfield Cross, will fall to 2-3bph.
- 5.111 As noted above the LVGV modelling already forecasts levels of congestion and delay that risk becoming ‘severe’.
- 5.112 With the increased risk of buses becoming delayed by congestion on the A327 corridor, it will be necessary to revisit the Bus Strategy for LVGV. At the time of writing the proposals rely on the funding of 5-6 additional buses (vehicles) to provide a reasonable level of service. These will attract a subsidy in the order of £5-6M and may require funding of bus priorities into Reading.
- 5.113 To address the congestion and delay issues on the A327 corridor, it is possible WBC and the appellants could agree to:
- (a) Identify further sustainable transport alternatives which have the potential to preserve traffic flow conditions similar to current forecasts;
 - (b) Seek other improvements to the A327 ERR to improve capacity and/or reduce delay on the ERR approach to Black-Boy Roundabout;
 - (c) Seek other improvements to the B3011 corridor to help with the sub-regional redistribution of traffic away from the A327 corridor;

- (d) Explore improvements to the westbound exit from the Black-Boy Roundabout towards J11, M4

Scenario B Summary

- 5.114 The appeal proposals not only risk direct harm to the transport network it also indirectly risks adversely affecting the viability and delivery of LVGV, the LPU and undermining the progress being achieved towards a transport vision for the Reading area.

Additional Issue 2: Access and Visibility Splays

- 5.115 The application included a speed survey of Reading Road. Despite the 30mph limit and traffic calming, it established the 85th percentile speed of vehicles was around 40mph.
- 5.116 The application is in outline with all matters except of access reserved. At the application stage, concerns were raised about visibility splays which appeared to be obstructed by vegetation and trees. At this stage, the applicant's proposed the removal of vegetation and trees.
- 5.117 Through the H&TSocG the parties have addressed the confusion relating to the tree that will now be retained and its proximity to the access.
- 5.118 Ultimately, the development will replace a current field gate, effectively resulting a substantial intensification of the access. To mitigate the impact on highway safety, the H&TSocG outlines proposed highway works on Reading Road to reduce vehicle speeds to an acceptable degree.
- 5.119 The highway works will be subject to a Stage 1 Road Safety Audit, part of the normal highway design process. This will involve an independent team of road safety experts, invited to visit the site, review proposals and make recommendations on '*opportunities to remove, reduce or mitigate the number and frequency of collisions*' within the highway works area. The proposals may therefore see subtle changes through the design stages.

- 5.120 Appropriate to the stage in planning and highway design, I am satisfied the (H&TSocG) works to Reading Road could deliver a satisfactory resolution to the access visibility issue.

Local Policy

- 5.121 Relating the appeal proposals as set out in RfR4 and elsewhere in this proof, and the complex issues associated with Additional Issue 1, I will now explore the policy tests to inform my judgement and recommendations to the Inquiry.
- 5.122 In my opinion, the over-riding principle of Policy CP1 is to support net-zero and deliver sustainable development. It states: "Planning permission will be granted for development proposals that: 1) **Maintain** or **enhance** the high quality of the environment; 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; and 12) Contribute towards the goal of reaching zero-carbon developments" [My emphasis]
- 5.123 CP1 sets an expectation that development maintains or enhances the environment, offering attractive, accessible and safe schemes. It is not enough to demonstrate there are opportunities for non-car travel, it is necessary to show how these opportunities will support the need to reduce travel, particularly by private car.
- 5.124 Policy CP2 "To ensure that new development contributes to the provision of sustainable and inclusive communities (including the provision of community facilities) to meet long term needs, planning permission will be granted for proposals that address the requirements of...a) An aging population... b)Children, young people and families, including the coordination of services to meet their needs...c) People with special needs... d) i) The site is located either within or close to the development limits of a settlement in policy CP9 in order to maximise the possibilities for social inclusion and sustainable patterns of living; and ii) The proposed site is not disproportionate to the scale of the existing settlement whether singly or cumulatively with any existing sites in the area."

- 5.125 Supporting text (4.15) states “In order to achieve sustainable development, it is important that the needs of all sections of the population are met through development.” Going on to offer some qualifications for differing demographic groups.
- 5.126 CP3 sets General Principles for development again stating: “Planning permission will be granted for proposals that: a) Are of an **appropriate scale**...b) Provide a functional, **accessible, safe**, secure and adaptable scheme; e) Use the full potential of the site and contribute to the support for suitable complementary facilities and uses; f) Contribute to a sense of place... h) Contribute towards the **provision of an appropriate sustainable network of community facilities**;... and j) Do not lead to a loss of community ... facilities... or infrastructure unless suitable alternative provision is available.” [My emphasis]
- 5.127 Policy CP6 (Managing Travel Demand) also states: “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...e) Mitigate **any** adverse effects upon the **local** and strategic **transport network** that arise from the development proposed f) **Enhance** road safety; and g) Do not cause highway problems...” [My emphasis]
- 5.128 CP6 is similar to the NPPF. It makes clear that sustainable development must offer travel choice when the development is complete. Setting an expectation that development mitigate ‘any’ adverse effects on the transport network.
- 5.129 Like CP3, CP9 seeks to manage the scale and location of development referring to “...*existing or proposed levels of facilities and services at or in the location, together with their accessibility*...” It attempts to steer major development proposals towards existing settlements or SDLs, where accessibility to facilities and services are or could be acceptable. The Core Strategy then qualifies scale of development in the Countryside (CP11).

- 5.130 Policy CC01 of the MDD cross-references the NPPF (then) and seeks to embrace the starting point of all proposals with a positive presumption in favour of sustainable development. It expands to align the tilted balance, suggesting *“Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise”*.

National Policy

- 5.131 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.” [My emphasis]. The appellants have not shown how this policy will be achieved.
- 5.132 Paragraph 83 goes on to state: “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].
- 5.133 To my mind, Paragraph 83 acknowledges how polycentric settlement patterns can support sustainable development, where communities might be linked with a range of transport options. Where development will support local services that might otherwise decline or be withdrawn the accessibility available by bus would change, as, it is reasonable to assume that these services could be less frequent (2-3bph) in the future and become less reliable due to network congestion.
- 5.134 Paragraph 89 of the NPPF states:

“Planning policies and decisions should recognise that sites needed 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 [sic]. 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)."

5.135 I consider paragraph 89 is intended to support locations where established businesses or (rural) economies require additional housing development, offering some direction as to the extent such local needs might tilt the planning balance in favour. I offer this judgement on the basis that the policy goes on to suggest that development 'exploits **any** opportunity' to make a location more sustainable. *[My emphasis]*.

5.136 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."* *[My emphasis]*.

5.137 I consider paragraph 110 offers a similar measured approach to managing spatial plans for development, explored above. Whilst it states proposals should 'maximise opportunities for sustainable travel' it tempers expectations relative to urban and rural areas, suggesting that "...*locations which are or can be made sustainable...* [offer] *a genuine choice of transport modes*".

5.138 The appeal site may benefit from good bus access to local facilities currently. But the Bus Strategy for LVGV is likely to alter bus services in this area. It may also be possible to cycle to some existing and planned facilities in the future, if/when cycle infrastructure is delivered, or new community land uses are delivered. Until they are, it will be necessary for future residents to travel further-afield to meet wider needs, as such there the need to offer a genuine

choice of transport modes is currently impractical relying on a raft of infrastructure improvements.

5.139 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**;*
- d) *...impacts from the development... can cost effectively **mitigated to an acceptable degree through a vision-led approach.**” [My emphasis]*

5.140 In my opinion paragraph 115 is pivotal to the need to deliver sustainable development, aligning expectations with a vision-led approach. With good spatial planning WBC has begun to tackle car ownership and use actively delivering its vision-led approach, seeking to achieve Climate Emergency Action Plan objectives.

5.141 Paragraph 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.”

5.142 Having had some involvement influencing the amendments to this part of the NPPF, I consider the wording of this paragraph qualifies ‘severe’ both in terms of mitigation’ and ‘residual cumulative’ impacts. As such, the policy accepts that conditions might be or are forecast to become ‘severe’, but the policy accepts that mitigation might not be delivered to mitigate traffic congestion, it can form part of a ‘vision’ to deliver mode shift.

5.143 The purpose and intent of this paragraph is to help the decision marker(s) judge the residual effects (cross-referenced to paragraph 115(d)) to judge if these can be ‘cost effectively mitigated to an acceptable degree’. Having taken this view, I have outlined the complex and inter-related issues to

Additional Issue 1 and have attempted to work with the appellants to identify opportunities to achieve these objectives, relative to the sustainable development vision for the Borough.

5.144 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....” [My emphasis]

5.145 The principle and scale of the appeal development might one day become suitable for housing development, but for now:

- h) The principle of development is unacceptable (RfR1);
- i) The quantum and scale of development is out of character (RfR2);
- j) The site location is unsustainable (RfR4); and
- k) The absence of planning obligations (RfR7) the proposals cannot ‘be made sustainable’ or cannot be ‘cost effectively mitigated to an acceptable degree.’

Case Summary

5.146 I have explored the site accessibility consistent with RfR4. I note the appeal site relies heavily on current bus services, which may change. Otherwise, the site relies on accessibility improvements that will be delivered by LVGV in the future and offers minimal mitigation to improve accessibility.

- 5.147 As the LPU gained weight and the position on *planned* development and infrastructure become clearer, the Council was obliged to Introduce Additional Matter 1 (Prejudice). Explaining the complexity of plans for LVGV to ‘cost effectively’ its impact on the transport network I have shown how the appeal site would have a detrimental effect on the network, which would result in the cumulative residual effects becoming ‘severe’.
- 5.148 Nevertheless, the Council considers that it can still work with the appellants to explore opportunities to ‘proportionately’ and ‘cost effectively’ mitigate the appeal proposals. But the appellants reliance on a package of measures currently contemplated, even alongside CIL, falls significant short of need to support the ‘presumption in favour of sustainable development’.

6. SUMMARY & CONCLUSION

- 6.1 I have carefully examined both the existing accessibility conditions at the appeal site and the wider transport context within which the LPU and the Loddon Valley Garden Village are being advanced. Having done so, my professional judgement remains that the appeal site is not in a location that can support sustainable patterns of travel today, nor can it reasonably be made sustainable through the limited measures proposed. The distances to everyday facilities exceed accepted walking thresholds, the walking environment is constrained, uncomfortable and discontinuous and there is no direct or coherent cycle route to the destinations upon which residents would rely. The outputs of the Department for Transport's Connectivity Tool reinforce this picture, placing the site well below the Borough average and confirming that future residents would be reliant on motorised modes for almost all day-to-day needs.
- 6.2 The appellants seek to place great weight on the future delivery of Loddon Valley Garden Village. I do not dispute that, once LVGV is built out in full accessibility will be markedly improved. However, the Garden Village is a complex, infrastructure led allocation whose viability and delivery depend on maintaining a careful balance of phasing, infrastructure triggers and transport capacity along the A327 corridor. It is essential that development and infrastructure advance together. In its current form, the appeal proposal sits entirely outside that planned balance. It would add unplanned traffic to a corridor that is already at or approaching capacity and, crucially, would do so without contributing to the strategic interventions that LVGV requires to function as intended.
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- 6.3 I have presented evidence on the A327 and explained how delays at Black Boy Roundabout already threaten bus journey time reliability, and how this will worsen as planned development comes forward. The LVGV interim transport strategy has been constructed to preserve bus priority and to secure the mode shift needed to support both the new community and the wider spatial strategy. If the appeal development were permitted ahead of the LVGV infrastructure programme, it would erode the effectiveness of that strategy, increase delay, undermine the reliability of bus services and result in the cumulative residual effects becoming 'severe'.
- 6.4 Taken together, the appeal proposal would deliver only minimal localised works which, while helpful in a limited sense, do not alter the fundamental accessibility constraints of the site nor address the strategic consequences for the A327 corridor. The development would remain car dependent, would not offer a genuine choice of transport modes, and would compromise planned infrastructure delivery at a critical moment in the Local Plan process.
- 6.5 For these reasons, and drawing upon both local and national policy tests, I cannot conclude that the proposal constitutes sustainable development. Therefore, I do not consider the proposals can be considered sustainable development and respectfully suggest the Inspector dismiss the appeal.