

Date: 28th August 2025
Application: 250415



**WOKINGHAM
BOROUGH COUNCIL**

Development Management &
Compliance

P.O. Box 157

Shute End, Wokingham

Berkshire, RG40 1BN

Tel: (0118) 974 6000

Minicom No: (0118) 974 6991

MEMORANDUM

From:	Ben Amey / Alan Lewis Highways Development Control		
Service	SDL Highways	App No:	250415
Address:	Shinfield Park, Whitley Wood Lane, Shinfield, Wokingham, RG2 9FW		
Proposal:	Full application for the proposed redevelopment of the site for flexible employment use (Use Class E(g)(ii)-(iii)/B2/B8) together with servicing areas, parking, landscaping and other associated works, including demolition		
Type of Development:	5.5Ha of		
Site Visit Made:	Yes/No		

Summary Of Recommendations

- ☐ 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**

Comments On Proposal

Introduction

The Local Highways Authority (LHA) has been asked to revisit its consultation response to full application no. 250415 for the redevelopment of the site for flexible employment use. Through the course of pre and post application discussions, the application was dealt with by our college who sadly and rather suddenly died.

Throughout the consultation period Gordon had liaised with colleagues in contributing to the view his informal and formally expressed through application. Where we agree with his observations and recommendations these have contributed to this response, but the opinions expressed are our own and may therefore vary.

Through scoping discussions the LHA was invited to consider the extant use and associated traffic generation explored further below, presenting some comparison of traffic trip generation between the extant and proposed uses. The applicants were advised that any application should be considered using local traffic model. Whilst work on traffic modelling ultimately advanced, the applicants submitted a simplified Transport Statement (TS), to ensure the application was validated on the working assumption that (micro-simulation, VISSIM) traffic modelling would be completed to demonstrate the scale of change of forecast traffic conditions and therefore complete a Transport Assessment (TA) to replace the initial Statement as the TS, considered by WBC as inadequate for a development of this scale.

As Gordon had been co-ordinating the application and traffic modelling the completion and co-ordination of some elements were disjointed, not least that other modelling (associated with the Local Plan Update (LPU) advanced concurrently.

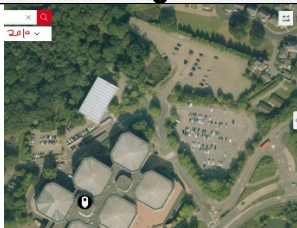
Previous Permitted & Extant Use

Berkshire County Council (BCC) occupied the site until 1998, when public services were reorganised to form unitary authorities across the County, including Wokingham Borough Council (WBC). As part of this use staff catering and some retail areas ancillary to the primary use formed a sizeable part of the use. Subsequently Foster Wheeler occupied some of the building until they were taken over by Wood in 2017. A press [announcement](#) indicates Wood Group no longer needed 23,730sq.m of office space; given they relocated to a 120,000sq.ft (11,148.3sq.m) office in Green Park.

It is understood to comprise of 23,730sq.m NIA of office use (Paragraph 2.1.2 of the Planning Statement). The application form describes the existing use as including 1520 parking spaces; the Transport Statement records that the use offered 1,025 car parking spaces (Para 5.10) along with a service area. Whilst parking provision has not been used as a means to estimate traffic generation this is a significant difference and should be clarified.

In Highway & Transport (H&T) terms this is a material consideration of significant weight and contributed to the Environmental Impact Assessment screening response.

The Wokingham Strategic Traffic Model (WSTM) was revalidated based on surveys in 2021, these record that the use of the site was substantially lower than the claimed Extant use. Indeed, satellite and streetview images show several car parks are either closed or under-utilised for many years.

Staff Car Park J (Oct. 2023) 	Car Parking 2022 	Car Parking 2019 
Car Parking 2013 	Car Parking 2010 	Car Parking 2004 

As a significant concrete office, the building has proved less suitable for commercial office use over many years and has ultimately been vacated. Demolition of the buildings is now well advanced, as such one might conclude the permitted use has been lost.

An array of case law examples have sought to explore and/or challenge if the permitted use remains extant. LHA understand that the general legal presumption is that if the planning use could be re-used, it should be considered to remain extant. The fact that the use has been physically lost or that the reconstruction of an office unsuitable for modern use is unviable, may reduce the weight that can be applied to the former trip generation that remains extant.

Extant Trip Generation

Table 5.1 of the Transport Statement (TS; based on TRICS data at Appendix A5) estimates the permitted office use. These consider relatively low traffic generating sites to ensure these are more comparable with the extant use in recent years (calculated to support parking accumulation in the order of 500 vehicles).

Planning Policy

From pre and post application discussions and exchanges, the applicants have asserted some opinions as to the status or weight that might be applied to adopted and emerging Local Policy, including the recent adopted Local Transport Plan and supporting documents. Generally, the salient adopted Core Strategy Policies are CP1, CP3 and CP6, with the aim that proposals set out to manage travel demands.

For ease we have outlined some salient policies from the National Planning Policy Framework (NPPF) as follows.

Paragraph 109 states that “Transport issues should be considered from the earliest stages...” amongst other things

- “realising opportunities from existing or proposed transport infrastructure...”
- “**identifying and pursuing opportunities to promote walking, cycling and public transport use**”.
- “identifying, assessing and taking into account the environmental impacts of traffic and transport infrastructure – including appropriate opportunities for avoiding and mitigating any adverse effects...” [our emphasis]

Paragraph 110 of the NPPF states “The planning system should actively manage patterns of growth... **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.”

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;” [our emphasis]

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.”

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.” [our emphasis]

The redevelopment of previously development land, close to the Strategic Road Network (SRN) and existing communities presents a sustainable development opportunity for commercial uses. However, other than EV charging points, the masterplan has identified opportunities for sustainable travel but it has not pursued them.

Masterplan Layout

Previous consultation responses have focused on the site layout to exploit the potential for concurrent activity and ensure the application can be determined positively. At this juncture it is assumed that the internal road infrastructure will remain private. Subject to management arrangements, WBC may require an APC to protect against highway adoption.

The existing site includes a bus stop and turning facility immediately adjacent the site entrance. Contrary to the NPPF the proposed masterplan intentionally omits any such provision degrading the site accessibility by public transport. It may be possible to retain similar infrastructure adjacent Unit 1 and the LHA invite the applicants to reconsider this element of the masterplan. As the waiting environment at this stop was broadly consistent with 'Bronze' provision based on the WBC Bus Stop Policy. For the stop to be attractive, particularly for shift workers, it should be reasonable to see these upgraded to 'Silver' stop.



None of the submitted plans detail driver, pedestrian or cycle visibility splays appropriate to the planned infrastructure. Some junctions and accesses require this level of detail to ensure these are or can be made safe and existing/planned landscaping and boundary fences can be kept clear for the intended use. Appropriate plans should be submitted for approval to enable appropriate conditions to be applied to any consent.

Sections of each building have been submitted recording approximate finished floor levels (FFL) of each building. Some appear to differ across plans which may correspond with dates of drawings. From the Drainage plan it is possible to explore the external road network, parking and turning areas across the site topography representing around 6m across the site with Building FFL terraced broadly 72.7m & 76m AOD and car parks c. 79m AOD. To fully judge the vehicular parking and circulation it is necessary to consider the broad topography to understand the gradient across some routes and how this might affect movement, parking and turning and in some cases security gates placed at site entrances. At this juncture it is likely that a planning condition would be applied to require gates to be fixed open during operating hours, but this could be reviewed on a case-by-case basis if necessary.

We acknowledge that Appendix A4 of the TS includes vehicle swept paths but many overlap, thus it would help to examine those movements that might be critical when ensuring that HGV can enter and leave in forward gear, particularly where this might be obstructed by other vehicles in a service area.

Similarly, in accordance with Part B of the Building Regulations, Appendix A4 identifies potential fire routes utilising pedestrian access routes to some buildings. It is essential these are detailed to show the width and gradient to demonstrate these are or can be made acceptable.

To ensure all parking and turning areas are kept clear for their intended use, swept paths should be submitted for approval to enable appropriate conditions to be applied to any consent.

Framework Travel Plan

The Framework Travel Plan (FTP) outlines potential arrangements to manage travel demands and support sustainable travel. Table 3.1/4.2 adopts 2011 Journey to Work mode shares to align travel demand forecasts, setting a series of targets (Table 4.2) and an Action Plan (Table 7.1), all of which are welcome.

Table 4.2 forecasts increases in walk and cycle mode shares but the Action Plan offers negligible incentives to support the level of growth planned. To increase walk/cycle mode shares each by 2% in five years will require tangible incentives and supporting infrastructure. For example, the Masterplan does identify cycle parking, the TS records the existing cycle map; but nowhere in the application are there details of changing rooms, lockers, showers. The application form records the Public Right of Way across the site, linking Whitley Wood Road and Rialton Close but does not seek to improve this to exploit accessibility to the bus services on Whitley Wood Road or the cycle routes beyond. It makes no reference to the Local Cycle Walking Infrastructure Plan ([LCWIP](#)), plans to deliver improvements in the immediate locale or the residual effect of these – explored further below.

Notably the Action Plan outlines a series of potential interventions which will need to align with commitments to escalate measures until the targets are met (e.g. provide bus taster tickets or season tickets until the bus mode share of 7.6% is achieved, which may need to be >12% if the train mode share is to reach 5.2%).

The application form describes the development as generating 558 Full-Time Equivalent (FTE) Staff. Even allowing for shift patterns, with a car driver mode share (73%) the proposals will require around 230 staff car parking spaces. As the proposals include 226 parking spaces this would not accommodate shift change periods and preclude visitors (explored further below).

As part of the LPU Evidence the Council has explored some of the work from home (WfH) patterns, noted in the FTP. These tend to reveal that around 50-55% of some jobs (which are sector dependant) embrace WfH practices around 2 days/week.

On the face of it, it is possible that the mix of trip generation rates considered in the TS (before and after the Pandemic) conceal some level of home working. Either way, the LHA expects the FTP Action Plan to outline how shift patterns and parking demands will be managed, which might be easier to resolve by revisiting trip rates using post-pandemic data.

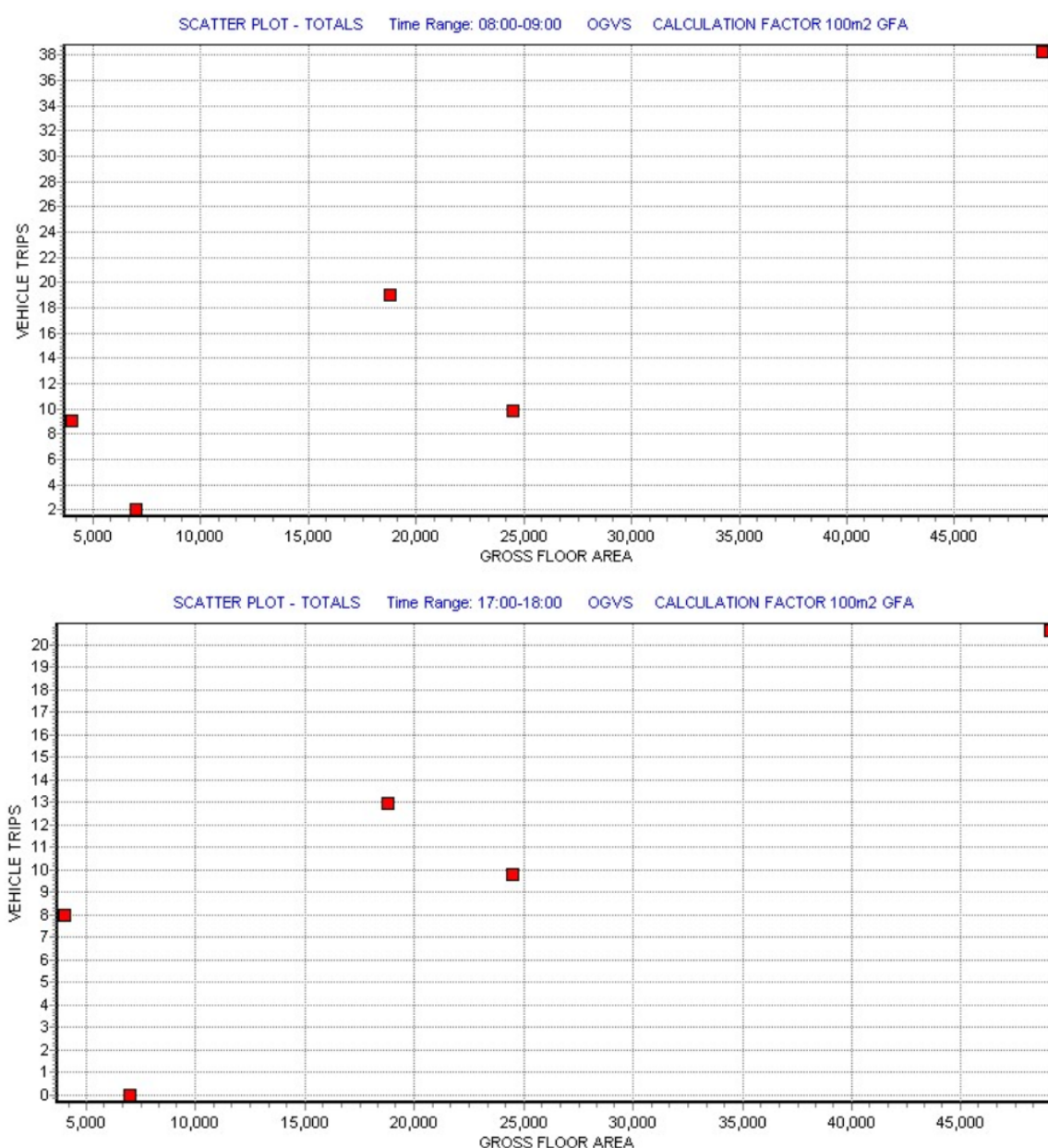
The FTP relies heavily on staff questionnaire survey alone. Whilst a valuable data source it will be necessary to supplement this with ([SAM](#)) surveys to verify travel forecasts and steps necessary to achieve the target mode shares.

The LHA recommends these additions are replaced so that the FTP can be conditioned, setting expectations escalating obligations if an occupier fails to meet the target objectives. These will form the basis of Travel Plans to be submitted with each reserved matters application, extending the monitoring period if the objective are not met.

Proposed Trip Generation Rates

Table 5.2 of the TS forecasts 131 two-way trips in the AM Peak Hour (08:00 – 09:00) and 112 two-way trips in the PM Peak Hour (17:00 – 18:00), derived from broadly comparable industrial estates across England. The TRICS selection were made in 2024 forecasting traffic flows and HGV movements.

Our records suggest that scoping discussions were considered positively, though we now note that many of the TRICS sites available today, record higher traffic flows. Recognising some of the challenges with a flexible commercial use, HGV forecasts can be quite different for other uses and site sizes, viz:



It might be unreasonable to re-open the traffic forecasting methodology, although it is reasonable to note that Table 5.5 of the TS, including HGVs is consistent with Table 12 in the Noise Assessment (described as '*Worst Case Assessment*') when in fact the assessment considers 13 HGV in a daytime period and Table 5.5 forecasts 12 HGV, based on an industrial estate - around half the level that might be expected from a B8 use.

Table 5.4 of the TS outlines the mode share of person trips at the site, aligning the mode shares and (2-way) traffic forecasts, with the peak hours. However even allowing for some staff to be dropped-off/picked-up from the site, Table 5.4 suggests around 90 staff arrive or depart in traditional peak hours.

The application form describes the development as generating 558 Full-Time Equivalent (FTE) Staff. If the proposals represent a 24 hour use it might be reasonable for around 200 staff to work on traditional office hours with around 3 shifts of 120 staff (say 6-2; 2-10;10-6). Whilst the application present some consistency in some areas these appear incompatible, thus it would help to clarify these. Whilst the bus services described in the TS might support the shift periods it is important that appropriate FTP measures support the mode share targets.

Parking Accumulation

Table 5.2 The LHA require clarification of how the parking accumulation has been calculated in order to demonstrate the number of proposed parking spaces is acceptable. There appears to be inconsistency between Table 5.2 (Trip Rates) and Table 5.5 (Parking Accumulation).

Table 5.5 appears to use 86 two-way vehicle movements during the AM Peak (08:00 – 09:00) (Cars 59 in, 17 out and HGVs 6 in and 4 out, Total = 86). It would therefore appear some vehicles (or trip surveys) incl. in Table 5.2 have been omitted from the accumulation in Table 5.5.

This contradicts the 131 two-way vehicle trips forecast in the AM Peak in Table 5.5.

Table 5.5 Parking Accumulation Assessment – Whole Development

Time	Cars				HGVs			
	In	Out	Accumulation	Sensitivity	In	Out	Accumulation	Sensitivity
Start			23	124			5	21
07:00	43	5	61	162	3	2	6	22
08:00	59	17	103	204	6	4	8	24
09:00	42	26	119	220	6	6	8	24
10:00	35	30	125	226	6	5	8	24
11:00	35	35	125	226	6	5	9	25
12:00	39	46	118	219	6	6	9	25
13:00	38	44	111	212	5	5	10	26
14:00	31	41	101	202	5	6	9	25
15:00	24	37	88	189	4	5	8	24
16:00	36	56	68	169	3	3	8	24
17:00	24	67	25	126	1	2	7	23
18:00	13	25	12	113	1	1	7	23

5.7 **Table 5.2** summarises the vehicle trip rate and resultant flows based on 20,102m² GIA.

Table 5.2 Proposed Industrial Unit

Period	Trip Rate			Trip Generation		
	Arrivals	Departures	Two-way	Arrivals	Departures	Two-way
AM Peak (08:00 – 09:00)	0.444	0.210	0.654	89	42	131
PM Peak (17:00 – 18:00)	0.159	0.397	0.556	32	80	112

Note: Based on floor area of 20,102m² Numbers may not calculate due to rounding

5.8 This assessment has demonstrated that the proposed development would have the potential to generate up to 131 two-way trips in the AM peak and 112 two-way trips in the PM peak.

Transport Impacts

At this juncture, taking the evidence at face-value, the proposed development will generate 112-131 (2-way) vehicle movements during the peak hour. Whitley Wood Lane past the site accommodates around 1,800-2,200 vehicles per hour (vph, 2-way during the AM/PM Peak hours) or 21,400 vehicles per day (vpd); around 10.2% of which is already Heavy Goods Vehicle (HGV) traffic. Subject to the distribution of traffic the proposals might represent 2-7% increase. The application outlines the development effects as small, and compared to the permitted use, the LHA generally agree but the magnitude of change is not the only policy test.

In support of the LPU the Council has developed and published [evidence](#), amongst other things considering baseline and forecast conditions at Junction 11 M4 and the A327 / B3270 Blackboy Roundabout (named after the pub). In support of the LPU WBC has established a Statement of Common Ground (SoCG) with National Highways related to the *cumulative residual effects* of development on the SRN; which *excludes* redevelopment of Shinfield Park). That SoCG incorporates arrangements for the planned mitigation of J11 M4, including improvements to the B3270.

As part of this evidence, WBC and development promoters have explored the delivery of interim improvements at the Blackboy Roundabout and a new M4 bridge, which will be supported with a viability assessment shortly. These interim improvements have been considered to reduce the risk of congestion becoming 'severe' (broadly between 2026-2032).

As the LPU has reached Regulation 22 stage it carries some weight as emerging evidence thus it is reasonable to contemplate how the proposed application (Shinfield Park) might materially alter this evidence. Notably the LPU (VISSIM) establishes that internal queues within the circulatory capacity of the roundabout can be managed by reducing the cycle time, reducing the efficiency of the junction and increasing queues on the approach. In the future, as congestion becomes more acute improvements to the Eastern Relief Road (ERR) are planned to accommodate extant consents and therefore support emerging proposals, ahead of the M4 bridge.

Whilst the magnitude of development traffic from Shinfield Park might be small, as this part of the network is operating around capacity currently and interim improvements are necessary to preserve conditions from becoming 'severe', the LHA invite the applicant to substantiate the statement in 6.8 of the TS.

Traffic Assessment

Sections of the B3270 and wider SRN interchanges operate with varying levels of congestion and delay. Some objectors/representations assert conditions are already 'severe' but this becomes a professional planning judgement. Before Junction 11 was

improved many junctions experience several minutes of delay sometimes backing up over 1km, significant investment in infrastructure does help the economy and development is an important part of this. (Travel) Demand management is also an important part of influencing sustainable travel choices, so WBC has sought to apply reasoned judgement relative to the operational effect of congestion and delay. Reading Borough Council (RBC) has tended to adopt a more draconian stance on demand management serving its Borough, sometimes removing road (or traffic) capacity to support mode shift, and the LCWIP plans contemplate a continuation of RBC plans into the WBC (A327), noted below.

The LHA note that the Transport Statement does not include any assessments of reasonable forecast scenarios and their effect on the highway network, instead focusing on the difference between the development proposals and the now lost extant use. It remains that LHA opinion that the extant use can be given weight in the determination of an application but without a proper assessment of conditions it must conclude the applicants have failed to demonstrate that the proposed development will not result in residual cumulative impacts on the road network becoming severe.

As some VISSIM modelling was conducted to inform the noise and air quality assessments, now submitted with the application, there seems little reason not to finish this assessment and submit this with the application.

Based on the potential interim improvements being considered for emerging applications, it is likely that the LHA could support the application if works to the western arm of the Black Boy Roundabout (immediately adjacent the site access) could be delivered as a S278 Agreement. At this stage it is envisaged these could provide a proportionate mitigation to the development impact, reallocating road-space to extend the exit funnel from the B3270/Whitley Wood Lane junction.

Based on the emerging Infrastructure Delivery Plan (IDP) and SoCG with National Highways provisional highway improvements at J11 have been identified. The emerging IDP identifies a cost around £1.8M. Whilst these need to be properly tested, given the emerging weight to be applied it is likely that the effect of the development will be small therefore a proportionate contribution would be reasonable.

Sustainable Transport

The above responses record how the masterplan could be revisited to comply with the NPPF, identifying and pursuing opportunities for sustainable travel.

The Transport Statement records existing transport infrastructure. It could be describe as identifying opportunities to promote walking, cycling and public transport use, but it does not pursue these opportunities or demonstrate how these could be made attractive enough to support the FTP targets.

2.19 of the TS describes the [3 Leopard](#) bus services on the A327 and how controlled crossings support access to these services. The nearest stops are at A327 Ducketts Farm where the waiting environment is broadly consistent with 'Bronze' provision. For these to be attractive, particularly for shift workers, it should be reasonable to see these upgraded to 'Silver' stops.

The TS omits reference to [600/650](#) services a short distance to the south, near the Shinfield Arms. Facilities at this northbound stop are already attractive (silver) but the services stop at 20:36. If public transport is to be pursued to support the development the applicants may wish to plan shift periods to align with services or support additional services earlier in the morning and into the evening.

In terms of active travel, the TS correctly identifies the existing network offers some good connections to surrounding areas. There are many gaps, notably connections into Reading, across the Borough boundaries. The public right of way (Shin10) extend a footpath across the site, linking Railton Close and bus stops provided on Whitley Wood Lane. This route also provides access to ([Buzz 9](#)) bus services on Whitley Wood Road.

Appendix E of the LCWIP identifies a series of improvement corridors. The A327 Shinfield Road plan identifies the option to:

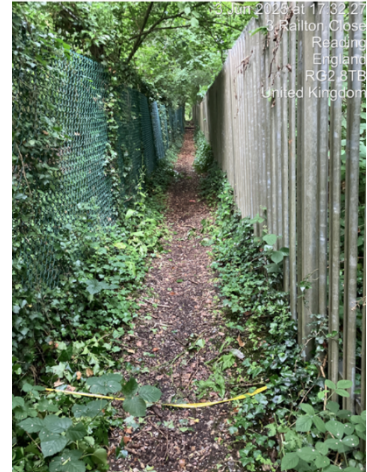
- Reduce speed limit to 30mph, and to 20mph outside Crossfields School;
- Replace uncontrolled crossing refuge islands with formal pedestrian crossings; and
- Where there is not enough space for segregated cycle facilities, reduce the speed limit to 20mph and introduce traffic calming, whilst also introducing shared use paths for pedestrians and cyclists.

Whilst these proposals have formally set the (policy) aspiration for cycle infrastructure, the LHA recognise these would reduce capacity on the A327 corridor, adding to network congestion. Whilst WBC is obliged to explore opportunities for sustainable travel and reduce traffic demand, consistent with the NPPF and adopted policy it is also right that WBC continues to look at these options and alternatives. In the face of the application and the prospect of traffic conditions becoming 'severe' it seems reasonable to explore alternatives that could be achieved in conjunction with development.

Footpath Shin 10 skirts the ancient woodland but fences have been breached such that the definitive route has been extended into the ancient woodland, which LHA understands is within WBC ownership. It is right that WBC protects the ancient woodland, but it is also reasonable to accept rights of way are being established within it. As this route could provide a modest (cycle route) alternative to removing capacity from the A327, and making highway network conditions worse, the opportunity this route offers to support the transport network should be pursued.



Within and adjacent the site the masterplan protects the definitive (Footpath) PROW which offers a rather unattractive environment for pedestrians. It is understood and accepted that designing out crime is an important material consideration, but it is also noted that the masterplan includes extended landscape areas adjacent Units 1 & 5 offering some enhancements in route amenity. Subject to the connection to Rialton Close, it should be possible to enhance and/or divert this route to be more attractive for active travellers, accepting also these may need to protect against PROW abuses (by motorcycles).



Summary

Consistent with Paragraph 118 of the NPPF, the LHA had expected a Transport Assessment would be submitted with the application. A series of unfortunate events have affected the momentum the applicants have made to positively determine the application thus WBC is obliged to develop a constructive way forward in determining the application.

The LHA accept that much of the evidence that would be produced in a TA has or is being advanced to inform the likely impacts of development. Subject to the level of public scrutiny that might be necessary, it may be reasonable to focus efforts to develop an appropriate package of mitigation to mitigate the development effects thus we would welcome the direction of the planning authority and the applicants efforts to agree solutions.

Date:	28 th August 2025	Signed:	Ben Amey / Alan Lewis
--------------	------------------------------	----------------	--------------------------