

PLANNING REF : 242484  
PROPERTY ADDRESS : Arborfield Road  
: Shinfield  
: RG2 9DY  
SUBMITTED BY : Miss Rachel White  
DATE SUBMITTED : 28/11/2024

COMMENTS:

Dear Sir/Madam,

I am writing to object to the planning application (reference 242484) to deliver 191 homes on land to the north of Arborfield Road, west of Shinfield Eastern Relief Road.

My objection has the following grounds:

1. Lack of meaningful consultation with local residents and the community
2. Car-focused development, not in line with national transport planning policy or carbon reduction targets
3. Poorly located site access
4. Flood risk

1. Lack of Consultation

The developer did not hold a public exhibition to share proposals with the local community. The Statement of Community Involvement states that instead "an invitation letter was sent to residents informing them of the proposals and giving them the opportunity to ask the consultation team questions and send feedback them. The project team felt the best form of engagement with residents was to deliver a letter and keep consultation channels, the project email address and phone number open. The team were conscious that not everyone is able to attend a physical exhibition given how busy people are and felt this method allowed for questions and comments to be answered."

This is a poor excuse for a complete lack of community consultation. Many residents would be able to attend an exhibition, and indeed it is common practice to also hold virtual consultations online, enabling further engagement. The leaflet provided to local households contained almost no information relating to the development proposals, and indicated that feedback could be provided when a planning application was submitted. It was entirely unclear from the leaflet that this was residents' singular opportunity to provide input to the design of the development, and also removed any opportunity for a detailed discussion with the developer or technical experts and review of detailed proposals.

The lack of suitable engagement does not accord with the Localism Act 2011.

2. Car-Focused Development

The Environmental Impact Assessment (EIA) screening opinion obtained for the site in June 2024 (Planning application reference 241326) confirmed required submission of a Travel Plan. It is

stated within the Transport Assessment (TA) supporting the application that instead of preparation of a Travel Plan, a contribution will be made towards My Journey Wokingham. My Journey Wokingham has clear acceptance criteria for developments wishing to join the programme, as outlined in Wokingham Borough Council's (WBC) Travel Planning Guidance 2017. This states that developments must achieve:

- Submission of a planning application with highways improvements
- Detail regarding facilities for sustainable travel, such as walking and cycling infrastructure connectivity
- 22kW electric car charging points
- Public transport infrastructure inclusion and improvement demonstrating connectivity

However, as outlined in the following sections, the development proposals do not include suitable walking, cycling or public transport connectivity improvements, and therefore the development cannot be considered suitable for a contribution towards travel planning;

instead a detailed travel plan to reduce travel by private car and carbon emissions should be produced and implemented by the developer, and planning obligations should be included to ensure that there is a mechanism in place to fund improvements should the developer not meet targets agreed with WBC within the travel plan.

The TA has determined the likely level of walking, cycling and public transport trips through the use of 2011 Census journey to work data. Not only is this data now approaching 15 years old, it does not take account of the fact that the majority of trips made are not for employment purposes. In fact, National Travel Survey data shows that commuting and business trips make up only 15% of all trips (National Travel Survey, 2023. Table 0403), 19% of morning peak hour trips and 29% of evening peak hour trips (National Travel Survey, 2023. Table 0502.). Commuting and business trips constitute only 6% of all walk trips, 31% of cycle trips, and 16% of all public transport trips. The TA therefore demonstrates a huge underestimation of the demand for walking, cycling and active travel, and cannot be considered to adequately assess and provide for these modes.

### Walking and Cycling Connectivity

A 3m wide shared foot/cycleway is proposed along the eastern edge of the development site, where it is poorly overlooked, with only 11 homes overlooking the >360m route. This does not accord with WBC's Highways Design Guide (National Travel Survey, 2023. Table 0409.), which states at 2.22.2 that "movement routes should be well overlooked to reduce the fear of crime and vulnerability". The Design Guide also highlights at Section 2.5 the need to consider personal security for off-road cycle facilities, and require the installation of lighting for routes that will cater for evening journeys. As the TA suggests that this route will connect residents of the development to nearby employment and train stations further afield.

It is therefore clear that the route is intended to be used for evening journeys, and therefore lighting should be provided.

Lighting is not however included in the proposals, and so there is a material safety risk to users of the route, alongside a real and significant risk that the route will not be used. There are no cycle facilities provided along the internal roads within the development, which include only the minimum 2m width footways, and therefore there are no suitable alternative routes for cyclists, which is likely to therefore lead to increased car demand, increased air pollution and carbon emissions and reduced health due to lower levels of active travel.

The site access includes an uncontrolled pedestrian crossing, which is poor design. Best practice dictates that pedestrians crossing the site access should be given visible priority; the give way line should be set back. There is opportunity to deliver a Copenhagen-style crossing at the access point.

The TA identifies three key walking routes:

- Route A: to Thames Valley Science Park and Lower Earley
- Route B: to Shinfield Village Centre
- Route C: to Reading via Brookers Hill or the Black Boy gyratory

#### Route A

It is disappointing that the TA has not identified the clear opportunity to improve active travel connectivity through delivery of a controlled crossing of the Eastern Relief Road (ERR). The ERR is a fast 50mph speed limit road, carrying heavy volumes of traffic and causing high levels of fear and intimidation for those wishing to cross it via the existing uncontrolled crossings. Given the development could be reasonably expected to increase pedestrian flows in this location, it is reasonable that it delivers an upgraded crossing at Cutbush Lane, to increase pedestrian (and cyclist) safety for those travelling both to Thames Valley Science Park and onwards to Lower Earley, Earley rail station and Winnersh Triangle Business Park. This could also increase attractiveness of active travel, leading to reduced car trips from the development site.

#### Route B

It is suggested that pedestrians could route via the public right of way FP7. This is a narrow, concealed footpath in this location, is neither lit nor overlooked by houses, and has grass/earth surfacing. It is unlikely therefore to be suitable for use in wet or wintery conditions, or at night, and many users would likely be uncomfortable to even use this in the day due to the poor levels of personal safety it offers. No proposals are made to improve this connection, and therefore it can be considered only, at best, a leisure route. The TA also suggests that cyclists could use FP7, and fails to note that this would, in fact, not be legal.

The only realistic routes to Shinfield centre are therefore either north, through the adjacent development, and returning southwards on Oatlands Road, which is a significant detour; or south via Arborfield Road. Neither route offers cycle infrastructure, and therefore cyclists will be required to travel on-carriageway. Arborfield Road is a fast, busy road, and this is likely to make cycling a wholly

unattractive option, including for travel to school. This will lead to increased vehicular trips, pollution and carbon emissions, and also decrease road use safety.

There are no crossings of Arborfield Road to the west of the evelopment site, other than the uncontrolled crossings at the roundabout. These crossings are unattractive to pedestrians, as they cross fast and busy roads. A new controlled crossing could be delivered, to encourage pedestrian activity and provide a community benefit, but this has not been considered by the development.

There is also a significant footway pinch-point on the B3349 immediately outside the small parade of shops adjacent to the roundabout, where parked vehicles at the shops block the footway, forcing pedestrians into the road and causing road safety issues. The development, despite increasing pedestrian activity in this location, has not identified the issue, nor proposed any solutions.

#### Route C

The TA suggests that users could route via Hollow Lane, but does not acknowledge that the stretch between Arborfield Road and Church Lane does not benefit from any cycle facilities, and, as a busy 40mph road, is therefore extremely unattractive to the majority of cyclists.

The TA considers that a 2-mile walk and 5-mile cycle to facilities is acceptable. This is at odds with all recent design guidance, including WBC's own guidance (National Travel Survey, 2023. Table 0409.), and Active Travel England's guidance (Active Travel England, 2024. Standing Advice Note: Active travel and sustainable development.), which both suggest 800m as a maximum for good accessibility. It is clear, from reviewing the appropriate guidance, that key facilities including secondary schools, rail stations and leisure facilities are significantly further from the site than recommended, which will lead to reduced physical activity, and increased car trips, pollution and carbon emissions. Significant parts of the development are also likely to be outside the recommended walk distances to other facilities, such as local shops, community facilities and healthcare, as the TA assesses distance from the centre of the site only.

The cycle parking provision at the site is not in line with best practice guidance. Local Transport Note 1/20 advises that 1 long stay cycle parking space per bedroom is required, which is significantly above the proposed inadequate level of provision.

#### Public Transport Connectivity

The EIA screening opinion obtained for the site in June 2024 (Department for Transport, 2020. Local Transport Note 1/20 Cycle Infrastructure Design.) confirmed at Table 3 that "enhancements to public transport infrastructure would need to be identified at the planning application stage".

Whilst the developer states that the spine road has been designed to accommodate buses, the supporting plans show a carriageway width of only 6.1m. Chartered Institution of Highways & Transport (CIHT)

guidance (CIHT, 2018. Buses in Urban Developments.), alongside best practice guidance published by Stagecoach (Stagecoach, 2017. Bus Services and New Residential Developments.) and WBC's own design guidance (Wokingham Borough Council, 2019. Living Streets A Highways Guide for Developers in Wokingham) states that 6.5m minimum width is required, and therefore it is clear that the route is not suitable to accommodate buses.

The TA states that the development layout "safeguards the ability for buses to travel through the development between Arborfield Road and the Shinfield Eastern Relief Road / Thames Valley Science Park roundabout should there be a desire to adopt such a routing in the future". However, there is no evidence of any assessment or liaison with bus operators to understand the potential appetite for this, and whether commercial bus services could be supported. There are, in fact, no proposals within the TA to provide any public transport infrastructure or improvements; this is at odds with the EIA screening opinion requirements and will further contribute towards car being the mode of choice for future residents' travel and increasing carbon emissions associated with the development.

The TA states that all areas of the site are within 600m walk distance of a bus stop, but no evidence is provided to support this claim. Regardless, a 600m walk distance is more than double the recommended maximum walk distance of 250m for areas with bus service frequencies of less than every 12 minutes (National Travel Survey, 2023. Table 0502.), and also significantly further than WBC's guidance of <300m to <400m (National Travel Survey, 2023. Table 0409.). Bus connectivity from the site is therefore extremely poor. This is further evidence that the development is car-orientated, and not in accordance with national planning policy.

Furthermore, the TA suggests that rail travel is reasonable from the development site. Given that the nearest railway station is 5.8km from the site, and Reading station is 7.5km from the site (constituting an approximately 40-minute bus journey), it is exceedingly unlikely that residents will choose to travel by rail, unless driving to the rail station.

## Local Facilities

It is abundantly clear that the developer has deliberately submitted this planning application separately from its previous application for development of the land to the north, in order to demonstrate a lower level of site viability and reduced requirement to deliver on-site local facilities for each site individually than would have been considered if the applications had come forth together. This has led to the provision of a poor quality development with poor connectivity to the north of the proposed development, and can only be expected to be repeated at the current application site. Considering the two sites together, as they should be through the Local Plan, the developments are of sufficient scale that some on-site facilities could reasonably be accommodated, both in terms of capacity and viability.

## Car Parking Provision

WBC states that its car parking calculator is a starting point and that local conditions and requirements should be taken into account. It also should be noted that WBC's car parking guidance is from 2011, and is therefore extremely dated. More recent research and guidance should have been considered in designing the proposed development. It is clear from the TA that Shinfield Parish Council has advised that a greater level of parking provision is required to accommodate the likely number of vehicles at the development and to avoid material highway safety impacts due to parking on-street, either within the

development or on surrounding local roads. This is not addressed within the TA, which provides no assessment of the likely car ownership levels within the site.

There also appears to be no consideration of disabled parking provision, including for visitors and for the unallocated parking provision for the flats. This is unacceptable and discriminatory.

### 3. Poor Site Access

The proposed site access on Arborfield Road is poorly conceived. The ERR runs adjacent to the site's eastern boundary, and could reasonably be used to provide a site access directly onto the strategic network, reducing the likelihood of vehicles travelling through Shinfield centre. Instead, an access has been proposed on a residential road, increasing conflicting vehicle and non-motorised user movements and therefore increasing the risk of collisions, and also increasing the likelihood of residents driving through Shinfield, and to facilities within Shinfield itself.

Additionally, due to the location of the proposed access immediately opposite existing properties on Arborfield Road, vehicles leaving the proposed development at night will result in glare and dazzling light shining both into windows of properties on the south side of Arborfield Road (constituting unacceptable light pollution and disturbance) and also into the eyes of drivers leaving driveways on the south side of Arborfield Road. Dazzling headlights is a real and significant danger on the road, and is directly responsible for collisions.

The reason for the selection of site access point is clearly that delivery of a junction on the ERR is considerably more expensive and difficult than delivery of an access on Arborfield Road. However, it is not acceptable to decrease safety for financial gain.

The traffic survey results included in the TA indicate that over 10% of vehicles on Arborfield Road travel at over 40mph. Unfortunately the TA does not include the full detailed traffic survey results, but it is likely that a far greater proportion of vehicles travel at over 40mph, when the peak hours when the roads are most congested are excluded. Increased vehicle speeds increase levels of fear and intimidation for non-motorised users, and disincentivise active travel. There is a significant missed opportunity; should the development come forwards with a new access onto Arborfield Road, it

should be a requirement for the developer to fund the consultation and (assuming the consultation process is successful) implementation of a speed limit reduction on Arborfield Road to 30mph between the B3349 roundabout and ERR roundabout.

#### 4. Flood Risk

WBC's own Local Plan evidence ( Wokingham Borough Council, 2020. Housing and Economic Land Availability Assessment Appendix B Part 4.) is clear that the site floods regularly, and that the site is considered unsuitable for development. Local residents have direct experience of the site flooding in recent years, post-delivery of the ERR, which is at odds with the Flood Risk Assessment supporting the planning application. Given the site is continuing to experience flooding, it is unclear how development of the site can be justified, as new homes will be at risk of flooding, and the development could exacerbate flooding to the extent it impacts existing homes.

#### Summary

There has been no effective consultation from the developer with regard to the proposals, and local residents have not been given ample opportunity prior to the planning submission to raise concerns or shape the development proposals.

The proposed development is a car-focused development that will have material negative impacts on highway safety due to overspill car parking and poor junction design. It will also have significant detrimental effects on existing residents' amenity and privacy, air quality, carbon emissions and climate.

It will increase congestion as a result of poor quality/non-existing sustainable travel options, and have detrimental human health impacts due to lack of opportunity for active travel. The proposals do not comply with the requirements and assumptions of the EIA screening opinion, indicating that significant negative environmental effects could arise as a result of the development.

The site is known to flood, including post-delivery of the Eastern Relief Road, and development of the site will exacerbate this issue, potentially causing flooding to both new homes and the surrounding existing homes.

#### References:

- 1 Planning application reference 241326
- 2 National Travel Survey, 2023. Table 0403.
- 3 National Travel Survey, 2023. Table 0502.
- 4 National Travel Survey, 2023. Table 0409.
- 5 Active Travel England, 2024. Standing Advice Note: Active travel and sustainable development.
- 6 Department for Transport, 2020. Local Transport Note 1/20 Cycle Infrastructure Design.
- 7 CIHT, 2018. Buses in Urban Developments.
- 8 Stagecoach, 2017. Bus Services and New Residential Developments.

9 Wokingham Borough Council, 2019. Living Streets A Highways Guide for Developers in Wokingham

10 Wokingham Borough Council, 2020. Housing and Economic Land Availability Assessment Appendix B Part 4.