



WOKINGHAM BOROUGH COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)

TOWN AND COUNTRY PLANNING (INQUIRIES PROCEDURE) RULES 2000

SECTION 78 APPEAL by Mactaggart and Mickel Strategic Land against the refusal by Wokingham Borough Council of application 242067 –:

Outline application for the proposed erection of up to 99 no. dwellings, green infrastructure, open space, pedestrian and cycle links, recreational facilities and other associated infrastructure and access points on Lodge Road and Tape Lane with required improvements (all matters reserved except for means of access)

Appeal ref: APP/X0360/W/25/3364304

Land Between Lodge Road and Tape Lane, Hurst, RG10 0EG

Proof of Evidence by Grace Blizzard MSc MCIHT CMILT
on behalf of Wokingham Borough Council as Highway Authority

1. AUTHOR BIOGRAPHY

- 1.1. My name is Grace Charlotte Blizzard. I am an Associate at WSP, instructed through the consultancy framework to represent the Highway Authority, Wokingham Borough Council at this appeal. I graduated from the University of Southampton with a master's degree in Transport Planning and Engineering, preceded by attainment of a bachelor's degree in Mathematical Sciences at Oxford Brookes University.
- 1.2. At WSP I have worked both supporting development proposals and in development management functions exploring traffic and transport issues. I have a breadth of project experience including residential, employment, leisure, schools, universities, hospital and airport schemes. I am a Chartered Member of the Institute of Logistics and Transport and a Member of the Chartered Institution of Highways and Transportation.
- 1.3. Over 14 years I have been involved in numerous projects within the Borough and am familiar with the area. I was not involved in the determination of this planning application, but have been briefed on the site and its appeal history. I have undertaken a visit to the site and its surrounds to examine the proposals and potential mitigation options.
- 1.4. I confirm that the evidence which I have prepared and provided for this appeal is true to the best of my knowledge. Any professional opinions expressed are my own, provided in accordance with the professional standards for the institutions to which I belong.

2. PROPOSED DEVELOPMENT

- 2.1. The appeal site is located on Land East of Lodge Road, Hurst, RG10 0EG.
- 2.2. Outline application for the proposed erection of up to 99 no. dwellings, green infrastructure, open space, pedestrian and cycle links, recreational facilities and other associated infrastructure and access points on Lodge Road and Tape Lane with required improvements (all matters reserved except for means of access).

3. CONSULTATION RESPONSE

- 3.1. Highways Development Control was consulted on planning application number 242067 on 29 November 2024. Supporting documents received as part of the planning submission included a Transport Assessment and a Framework Travel Plan, both dated 26 July 2024, a Transport Assessment Addendum dated 19 November 2024 and an updated Framework Travel Plan dated 13 November 2024.
- 3.2. The scope of any statement is determined by the over-riding need to demonstrate how the transport demands of a particular development can be met within the existing and planned transport network. This should take account of existing infrastructure, transport services, transport capacity restraints and how the development can be mitigated.
- 3.3. Highways Development Control undertook a review of the supporting documents outlined above, which included a brief sustainability assessment on walking, cycling and public transport. At that stage no objections were raised, subject to further information being sought from the Appellant before determination. However, the details provided have failed to demonstrate to the Council's satisfaction that the site is sustainable in transport terms with regards to its location and access to services.
- 3.4. The site is therefore considered an unsustainable site and there were insufficient proposals to improve facilities for sustainable modes and discourage reliance upon private car use, and hence against key policies in the Development Plan and NPPF.
- 3.5. A further detailed review of the site's accessibility to local facilities by sustainable means, and of the latest proposals for public transport improvements put forward by the Appellant, has been set out within sections 7 and 8 of this evidence.

4. WBC REASON FOR REFUSAL

4.1. Reason for Refusal 4 unsustainable location

The application site is within an unsustainable location where residents would be reliant on private vehicles for basic day-to-day needs, by reason of the countryside location outside of settlement limits, distances to facilities and services, limited public transport links and poor quality of the walking/cycling environment, contrary to policies CP1, CP2, CP3, CP6 and CP11 of the Core Strategy, CC01 and CC02 of the MDD Local Plan, the Borough Design Guide SPD and section 8 & 9 of the NPPF.

4.2. 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 are too far to encourage the use of sustainable modes.
- c) The routes available to walk or cycle to local facilities and public transport services are limited or poor and would not encourage more sustainable forms of travel.
- d) The environment for walking and cycling to public transport services, local facilities and amenities is not safe nor attractive.
- e) The consequence of this will be an unacceptable level of dependency on the private car which is contrary to the Development Plan and NPPF.

5. POLICY

Wokingham Borough Core Strategy Development Plan Document

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

5.2. Policy CP1 states that development should:

10. *"Provide attractive, functional, accessible, safe, secure and adaptable schemes"*

11. *"Demonstrate how they support opportunities for reducing the need to travel, particularly by private car in line with CP6".*

The application did not. In Section 8 I will expand with further information on the active travel network.

5.3. Policy CP2 seeks "To ensure that new development contributes to the provision of sustainable and inclusive communities... to meet long term needs..." where development addresses requirements for (b) "Children, young people and families, including the co-ordination of services to meet their needs..." going on in supporting text (4.17) to state "Sustainably meeting the needs of young people includes ensuring that children of primary school age have access to a school within walking or cycling distance of their home (3-4km) along a safe route."

5.4. Policy CP3 states development should *'provide a functional, accessible, safe, secure and adaptable scheme'*. In Sections 7 -9 I will expand my evidence to show that potential occupiers will not be in an accessible location and that their limited options for sustainable travel will not be safe.

5.5. Policy CP6 states of the Core Strategy states that:

'Planning permission will be granted for schemes that:

a. Provide for sustainable forms of transport to allow choice;

b. Are located where there are or will be at the time of development choices in the mode of transport available and which minimise the distance people need to travel;'

‘Paragraph 2.16 recognises that the borough has one of the highest car ownership rates of any English local authority¹. To reduce the likelihood that these vehicles will be used and to encourage modal shift, it is important to ensure all proposals achieve sustainable development.’

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

In Sections 8 and 9 I will expand my evidence to show that potential occupiers will have no or limited choice of sustainable transport.

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

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

In Sections 7-9 I will expand my evidence to record efforts to manage travel needs and support more sustainable forms of transport.

National Planning Policy Framework (NPPF)

- 5.7. 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.’

¹ Based on 2021 Census data on Car and Van Ownership for Wokingham

This paragraph makes clear that "significant" development should be focused on more sustainable locations. Although the paragraph acknowledges the differences in sustainability terms between rural and urban areas, the size and scale of a development are important considerations in deciding whether a development is sustainably located.

This was discussed by the previous Inspector within paragraphs 76-78 of the Appeal Decision where he commented that "Small housing developments are only likely to have a modest impact if new residents need to use the private car, for reasons such as convenience or expediency, whereas larger, more significant developments, possibly housing several hundred people, are likely to have a much greater impact if these large numbers of people use unsustainable modes of travel.

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

- a) *"give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;*
- b) *address the needs of people with disabilities and reduced mobility in relation to all modes of transport;*
- c) *create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;*
- d) *allow for the efficient delivery of goods, and access by service and emergency vehicles; and*
- e) *be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations."* [my emphasis]

I will expand in Section 8, that the Appellant has proposed improvements to pedestrian and cycle movements which are unlikely to achieve satisfactorily attractive alternatives to the private car. As I will expand in Section 9, the Appellant has not facilitated access to high quality public transport.

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

Other standards and guidelines

- 5.10. The Borough Design Guide sets out as one of its key design objectives – Connection and Accessibility:
- a. *Provide facilities to promote all modes of transport, including in particular walking, cycling and public transport, and*
 - b. *Reducing the need to travel, through the location of development to promote integration and accessibility.*
- 5.11. Manual for Streets puts well designed residential streets at the heart of sustainable communities. A higher priority is assigned to pedestrian and cyclists. It recognises that residential streets create places that work for all the community. It also states that a crucial factor in the design of a new development is the consideration of the needs of the street users. This means that the design should aim to be inclusive, providing, wherever possible, the opportunity for all kinds of road users to fully access the facilities of the development.
- 5.12. The Borough’s highway design guidance (2019) outlines the key principles to follow when producing new highway layouts for all types of development. These layouts should be compliant with the philosophy of Manual for Streets and Manual for Streets 2 by creating quality places that are fully accessible by all modes of transport.
- 5.13. Active Travel Guidance is being developed on behalf of WBC currently. This will be used to supplement and provide advance on guidance already set out by DfT’s LTN1/20 ‘Cycle Infrastructure Design’.
- 5.14. On 26 June 2025, DfT released The Connectivity Tool providing a nationally agreed measure of the level of connectivity of potential development sites. This will help determine how well locations can connect people with where they need to go, using sustainable travel modes.
- 5.15. The LPA’s representatives for Planning will deal with the conflicts with the policy and guidance in more detail, but it is considered that the proposed development conflicts with policy due to the unsuitability of the location and highway safety.

6. PROXIMITY OF FACILITIES AND SERVICES

- 6.1. The sustainability of a development is largely dependent on the potential for its future users to have access to day-to-day facilities and through maximising sustainable travel choices. NPPF policy seeks to limit the need to travel, which would be supported through good proximity to local facilities, and by providing sustainable travel connections to facilities further afield where these land uses cannot serve locally.
- 6.2. In rural settlements it is acknowledged that facilities may be more limited and therefore as is the scope to limit the need to travel. This is why the NPPF (para 110) requires the planning system to “actively manage patterns of growth” and – importantly for this appeal – that “significant development” should be focused on locations that are or can be made sustainable”. Ensuring opportunities are taken to achieve strong connectivity to facilities by sustainable means becomes imperative in such cases.
- 6.3. To assist plan-making and decision-taking, the Department for Transport has released the first nationally agreed measure for determining connectivity levels of a location. The Connectivity Tool is intended to enable developments to be placed in the most sustainable locations and help plan the necessary infrastructure to support them. This is to support alignment with national policy to ‘*ensure an integrated approach to considering the location of ... community facilities and services*’ (NPPF paragraph 98e), ‘*realising opportunities from existing or proposed transport infrastructures*’ (NPPF paragraph 109d), and ‘*to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities*’ (NPPF paragraph 111a). The tool combines transport and land use data to generate a connectivity score that measures people's ability to get where they want to go, using walking, cycling and public transport to reach jobs, shops, schools, healthcare and other essential services. The outcome of its use should enable development to ‘*be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of travel modes*’ (NPPF paragraph 110).

- 6.4. This index measure provides relative connectivity and takes account of different destinations, modes of travel and travel time. The location of the site is reported by the DfT to achieve a connectivity score of 43 out of 100. This indicates a below average metric and highlights the need for additional infrastructure to make the area more connected, such as providing additional facilities and improving public transport connections.
- 6.5. To further support the recently published Connectivity Tool, WBC are also developing a tool to assist in calculating the 'accessibility score' for sites in alignment with the DfT tool. It is intended for this tool to be further developed based on outcomes from appeal decisions in the Borough, to enable improved application of the titled balance within planning determinations. It is intended that the tool shall involve consideration of quantitative (distance) and qualitative terms (i.e. severance, quality of route including width, lighting and proximity/speed of adjacent traffic)
- 6.6. The Borough Design Guide SPD (CD 10.17) 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.'
- 6.7. In addition, walkable neighbourhoods are defined in Manual for Streets (CD 10.18) as those typically characterised by having a range of facilities within 10 minutes walking distance from residential area. Manual for Streets clarifies that 10 minutes walking distance is roughly 800 metres.
- 6.8. The National Design Guide (2019) confirms that "walkable neighbourhoods" means 'local facilities are within walking distance, generally considered to be no more than a 10-minute walk (800m radius).'
- 6.9. None of these guidance documents expressly distinguish between urban, suburban and rural locations, which implies that the 800m / 10 minute threshold is applicable in all contexts.
- 6.10. The IHT's Guidelines for Providing For Journeys on Foot (CD 10.20) makes the following recommendations for suggested acceptable walking distances for pedestrians without a mobility impairment:

Table 1 – Recommended Walking Distances (IHT)

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

- 6.11. This table suggests that 800m is an acceptable walking distance for locations outside of town centres, which presumably includes rural areas, for journeys other than commuting or travelling to school.
- 6.12. The table below sets out the distances to various facilities and services that would serve the day-to-day needs of the residents of the proposed dwellings. The distances are based on the actual routes pedestrians would use via either the main access onto Lodge Road or the proposed pedestrian access onto Tape Lane. It is noted that distances alone should not inform perceived willingness to walk / cycle to these facilities, and that the majority of destinations cannot be reached using continuous provision that can be considered safe and attractive, as explored further in this section.
- 6.13. Distances are measured from a point in the centre of the appeal site. It is noted that the placement of dwellings within the site layout are approximately half of units in the north-east and half in the south-west. Therefore approximately half of new residents will be required to travel further than the distances below, by up to 200m, more than an additional two minutes on foot. Walking speed is taken as 1.4m/s (based on MfS 800m in 10 minutes) and cycling speeds are 4.44 m/s in line with LTN 1/20 (assuming 10mph cycling speed).

Table 2 – Summary of Local Facilities and Distance / Travel Time

Destination	Location	Distance (m)	Walk Time (Minutes)	Cycle Time (Minutes)
Education	St Nicholas Pre School	450	5	2
	St Nicholas CofE Primary School	500	6	2
	The Colleton Primary School	2200	26	9
	The Forest School (Boys)	3600	-	14
	Emmbrook School	5700	-	23
	Holt School (Girls)	5500	-	22
	The Piggott Secondary School	4600	-	18
	Waingels College	3900	-	16
Leisure	Hurst Cricket Club	660	8	3
	The Green Man Public House	830	10	3
	Hurst Gospel Hall	750	9	3
	Hurst Village Hall	425	5	2
	Scout Hut	435	5	2
	Allotments	200	2	1
	Hurst Recreation Ground	640	8	3
	Dinton Activity Centre	2000	24	8
	Elephant and Castle Public House	850	10	3
	Twyford Library	3100	37	12
	Twyford Health Club	3000	36	12
	The Castle Inn	1025	12	4
Shops	Waitrose and Partners	3000	36	11
	Tesco Express	2900	35	11
Health	Newdays Pharmacy	2900	35	11
	Twyford Surgery	3400	-	13
	Twyford Dental Centre	2900	35	11

Employment	Orchard Nursery Business units	615	7	2
	Lea Farm Business Unit	1100	13	4
	Beech Court Business Centre	1300	15	5
	Nelsons Lane	2600	31	10
	Twyford High Street	2700	32	10
	Winnersh Employment Area	3800	-	14
Bus Stop	Wards Cross Bus Stops	400	5	2
Train Station	Twyford Railway Station	2400	29	9

6.14. There is one single form entry primary school although, it has only very limited additional capacity so primary aged children resident in this development would likely be required to travel further to access primary education, contrary to policy CP2 [the closest schools in catchment are St Dominic Savio Catholic Primary (5.2km) or Beechwood Primary in Woodley (4.5km)].

6.15. There is no secondary school in Hurst or Whistley Green and as such secondary aged children would be required to travel a considerable distance, the nearest being The Forest School (Boys) at 3.9km from the site, precluding these from realistically being accessed on foot by residents of the development. As concluded by the Inspector as part of the previous appeal decision:

‘...secondary schools...could not reasonably be reached on foot. This is because they lie... outside the preferred maximum distance of 2.0km considered appropriate for commuting and school trips.’

6.16. Whilst cycling could be a viable option based on distances alone, infrastructure is limited, disjointed and fails to extend in all directions. Routes to access Wokingham, Winnersh and Woodley require use of unlit, narrow A and B roads with no cycle infrastructure, which is not safe or suitable for regular use, particularly for inexperienced school children.

- 6.17. There are existing bus connections to The Forest School (Boys), Emmbrook School and Holt School (Girls), and a potential new bus connection to The Piggott C of E School proposed by the Appellant, albeit with viability concerns as further discussed in Section 8. However these connections are not well aligned with school timetables, which was also commented on by the previous Inspector (paragraph 91 of the Appeal Decision):

'Mr Whittingham also maintained that the 128/129 bus services pass relatively close to the secondary schools both north and south of Hurst, and set out in some detail how children's journeys to these schools would feasibly work. However, the Piggott School and Waingels College are more than a 20 minute walk from the nearest bus stop, and to reach the nearest bus stop for the return journey back from Emmbrook School and the Holt School would require walks of 20 minutes and 30 minutes respectively. I share the Council's view that the bus timetable does not align well with most of the schools' finishing times, meaning that there is the potential for children to have to endure a long and inconvenient wait at the bus stop.'

- 6.18. The closest convenience store is currently Tesco Express in Twyford, located 2.9km from the site, beyond any maximum acceptable walking distance.
- 6.19. Until recently, Hurst Post Office and Shop located 400m from the site on Broadwater Lane provided the closest facility for convenience goods (top-up shopping only). Should the shop re-open, the route to access it by foot from the site would involve crossing Broadwater Lane from the western side to east due to discontinued footway provision, and crossing back to western side to enter the shop. On departing the shop, pedestrians face limited visibility on the inside of the bend to cross back through parked cars to an available footway, which is particularly unsafe for pushchairs and those with limited mobility. Speed surveys provided by the Appellant indicate breaches of the sign posted speed limit by 43% and 21% of all vehicles for northbound and southbound traffic respectively. While it is acknowledged that the enhancements proposed by the Appellant to improve pedestrian infrastructure between the site and the (hopefully) re-opened shop, narrow footways remain along this route and it is likely to be more attractive and convenient for residents to drive further afield for easier access to daily essentials, with the range of goods and viability of a new local shop unknown at this stage.

- 6.20. The nearest GP surgery is located in Twyford. The hourly bus service 128 can be taken to Twyford Cross Roads, followed by a 10 minute walk to reach the GP. For those that cannot manage such a walk, an onward journey using the 850 bus service is possible, however the two services do not align well, making the walk necessary most times of the day. It is likely that access to healthcare uses will therefore rely upon the more convenient use of cars.
- 6.21. Many of the facilities located within Hurst itself are unlikely to go far in serving the daily needs of prospective residents, for example opportunities for leisure activities provided by the cricket club and recreation ground are likely to be limited to seasonal use. Furthermore, many of the closest employment facilities are collections of a few small business units which provide limited opportunity to align with skills / experience of residents, and the local primary school in Hurst is oversubscribed, and a Church of England school so may not be suitable for all primary aged children of the proposed development.

7. ACTIVE TRAVEL (WALKING AND CYCLING ROUTES)

- 7.1. The Appellant has set out proposals along Lodge Road, Broadwater Lane, Tape Lane and School Road to enhance pedestrian infrastructure surrounding the site. Unfortunately, this does not change the fact that facilities that could be accessed within the settlement via this improved network are very limited in serving the day to day needs of future residents, who will look to travel externally for most land uses. This begs the question of how this improved pedestrian infrastructure indeed contributes to achieving a walkable neighbourhood with a range of facilities within 10 minutes walking distance, as prescribed by the Borough Design Guide SPD, Manual for Streets and the National Design Guide.
- 7.2. Acknowledging the need to cater for travel to Twyford for basic facilities, the proposed potential off-site cycle provision amendments northwards to Twyford Railway Station would be fragmented between on road advisory cycle lanes and shared cycle footpaths. For example, the TA addendum showed that cyclists traveling northwards along the A321 would have to stop and dismount on the carriageway shortly after the Elephant and Castle Pub and then cross the road to pick up the shared foot and cycle path. Cyclists would then have to cross the road again to another section of advisory cycle path within Twyford before Wellington Close and then ride onto the pavement again before Twyford Train Station. No formal crossing facilities giving priority to pedestrians are proposed to support this.
- 7.3. The requirement for frequent dismounting and crossing the road would make for an unattractive route. It is likely to be perceived as involving excessive risk or inconvenience, or both, to the majority of users.
- 7.4. Community severance is a useful measure of people's ability to access facilities within their community, considering the relative ease pedestrians can cross and the directness of the route available, reproduced from the Design Manual for Roads & Bridges in Table 3 below. Relative to advice on uncontrolled crossings in Chapter 6 of the Traffic Signs Manual, one can broadly judge that streets with high and medium levels of severance are difficult to cross most of the day and during busier periods, respectively.

Table 3 – Severance (DMRB LA112)

Severance	Traffic Flow (vehicles per day)
Very High	>16,000 vpd
High	>8-16,000 vpd
Medium	>4-8,000 vpd
Low	<4,000 vpd

- 7.5. Hurst Road is understood to observe annual average weekday traffic flows of 6,352 vehicles per day (vpd)² indicating that it will be difficult for users to find a gap to cross during busier times of the day, such as commuter peaks. This could present cyclists with delays to their journeys or potentially shorter gap acceptances taken by cyclists, posing potential safety concerns.
- 7.6. The Road Safety Audits (CD 10.3) provided highlight that cars would have to enter into the advisory cycle lanes to avoid crossing the central reservation. Given the high-volume of cars along these roads, this would be a constant occurrence. The proposed amendments to cycle provision towards Twyford are not considered to have a meaningful influence on the use of sustainable travel choices by residents of the site.

² According to Road Safety Audit, Transport Assessment Appendix E, Problem A.2.1

8. PUBLIC TRANSPORT LEVEL OF SERVICE

- 8.1. The NPPF requirement for access to high quality public transport facilities is not quantified but Wokingham Borough Council does specify the 'good' standard required in the borough as set out by CP6 of the Core Strategy (CD 12.1) at 4.37:

'In line with the WDLP definition, good public transport services meet the following requirements:

- a) At least a thirty-minute service frequency during peak times (7:00 to 9:00 and 16:00 to 19:00 Monday to Saturday); and*
- b) At least an hourly service frequency during off-peak hours (9:00 to 16:00 and 19:00 to 22:00 Monday to Saturday and between 7:00 and 22:00 on Sundays).'*

- 8.2. The CIHT on Section 6.4 of Planning for Walking recommends a maximum 400 metres walking distance to bus stops in residential areas. In addition, Table 4 of Buses in Urban Developments goes further and recommends that the maximum walking distance to a bus stop with single high-frequency routes (every 12 minutes or better) and less frequent routes would need to be within 400m and 300m, respectively.

- 8.3. Such distance is further complemented by the latest Wokingham Bus Service Improvement Plan (2024) Proposal 11B and 20A, which states that:

11B: "New development areas to be set out with safe, secure routes to regularly spaced bus stops and housing to be within a maximum walking distance of 400m to a stop."

20A: "Ensure high quality provision of bus services and associated infrastructure to all new developments emerging from the Local Plan. To include access to a bus stop with a regular service within 400m of all residential dwelling unless there are exceptional circumstances."

- 8.4. Access to existing bus stops at Wards Cross would involve a travel distance of up to 600m for residents in the south-west corner of the site, contrary to CIHT's 'Planning for Walking' and WBC's Bus Service Improvement Plan.

- 8.5. The existing bus service 128/129 schedule is summarised in the table below, whilst the full timetable can be found at Appendix 1. It has been established by the Appellant from liaison with the operator, Thames Valley Buses, that this service is currently heavily subsidised by WBC.

Table 4 – Bus Service 128/129 Timetable Summary

Route	Direction / Route	Service Frequency		
		Weekday	Saturdays	Sundays
128 / 129	Wokingham – Winnersh – Hurst – Twyford – Woodley – Reading	First service at 07:23 then every 65 minutes between 09:32 and 15:49	Hourly service between 08:41 and 09:38, then circa every two hours until 17:21	No service
	Reading – Woodley – Twyford – Hurst – Winnersh – Wokingham	First service at 07:54 then every 65 minutes between 09:09 until 19:27	Service every two hours between 10:08 and 18:25	No service

- 8.6. Importantly there is just one service serving the settlement during the weekday morning commuting peak and only two return services from Twyford station after 18.00. The Saturday service terminates very early in the evening making it unviable for anyone wanting to access entertainment and leisure activities outside of the settlement. There is no service at all on Sundays.
- 8.7. In addition I am aware from information obtained in the previous appeal that there are reliability issues with the existing service. A letter from Thames Valley Buses (dated January 2023) confirms that between 77%-93% of services were “on time” in 2022 (which is defined as between 1 minute early and 5 minutes late). I attach a copy of this letter as Appendix 2. Although some users may be able to live-track the bus using an app, this would not necessarily be viable for all users and would be of limited benefit if users are reliant on the bus for a time-critical journey.
- 8.8. The 128/129 bus service provides existing connections with secondary schools in Winnersh / Wokingham, including Forest School, Emmbrook School and Holt School. However I have noted above that the bus and school timetables are generally not well aligned.

- 8.9. The Appellant has set out in its Proposed Bus Improvement Strategy (CD 10.21) options to provide additional bus service provision to encourage use of public transport as a realistic option, which concludes with a recommendation for 'Option 4'. This includes provision of a new bespoke service between Winnersh and The Piggott Secondary School via Hurst, routing through the development. Operating Monday to Saturday 07:00-10:00 and 15:00-19:00, the service would seek to enhance peak time connectivity to The Piggott Secondary School and to support onward travel connections via Twyford Station.
- 8.10. A Bus Service Fund has been set out by the Appellant indicating that a developer contribution of £1.5m placed in an interest-bearing account would cover the majority of its estimated £173k annual operating cost for an estimated period of 14-15 years. The remainder would be fulfilled through a £20 monthly service charge commitment woven into residents' sales agreements.
- 8.11. The new bespoke service is intended to supplement the existing 128/129 bus service, the latter of which would be the only bus service running in the daytime between 10:00 – 15:00. Therefore to achieve access to all available bus services, residents would need to outlay the mandatory service charge of £20 a month (£240 annually) for the new bus service, but also cover the cost of using the 128/129, for which the annual cost of a season ticket is currently £960 for adults, £700 for under 18s. The resulting offer would still fail to constitute, in my opinion, a good quality public transport provision which residents could rely upon, contrary to Policy CP6.
- 8.12. The funding forecast provided by the Appellant takes account of the benefit of interest (3%) within the annual projections, however makes no allowance for inevitable rising operational costs or inflation over the 14-15 year period. Indeed the assessment has been undertaken based on two scenarios of annual operating costs of £100k and £170k, despite the estimation from Thames Valley Buses that the service would cost £173k annually to run. The Appellant acknowledges that market costs will inevitably change in the lifetime of the service, however given the finite £1.5m funding pot, it is clear that the service is unlikely to viably achieve the 14-15 year projection. Given that the service is very heavily reliant on subsidy, beyond the period part-funded by the developer contribution, it would not be self-sustaining and would therefore either require additional subsidy from WBC (potentially to the detriment of existing routes) or to be terminated. It therefore does not present a long-term solution to the poor quality of local bus services.

- 8.13. Through consultation on the options set out within the Proposed Bus Improvement Strategy by the Appellant, TVB has indicated that a new bespoke service represents the most viable improvement solution. This highlights that the Appellants alternative mechanism offered, whereby WBC could draw down on the remaining balance to redirect funding to other bus improvement measures, would lead to no significantly more viable, long term solution to ensure residents have access to good quality bus service provision in line with CP6 of the Core Strategy.
- 8.14. None of the bus improvement options presented by the Appellant have managed to satisfy the WDLP and Core Strategy definition of good public transport services, in that there would remain no access to an hourly bus service during evenings from Monday to Saturday, nor between 07:00 – 22:00 on Sundays.
- 8.15. In lieu of a good range of local facilities within walkable distance, and without public transport provision that achieves a practical, reliable option for the majority, the most convenient solution would remain the private motorised vehicle.
- 8.16. For onward connections via rail services at the nearest station in Twyford, I note the previous Inspector's comments from paragraphs 94-95 of the Appeal Decision:
- “From evidence provided to the Inquiry, including from Hurst residents who regularly commute into London, it was generally accepted that commuters from Twyford are more likely to opt for the pre-existing GWR services through Maidenhead and Slough for journeys east, which are significantly quicker than the Elizabeth Line's stopping service. The main benefit of the Elizabeth Line was seen to be the improved connections for journeys into central London beyond Paddington Station.
- 8.17. With these points in mind, I share the Council's view that the arrival of the Elizabeth Line does not appear to have overly benefitted Twyford commuters, and that it has not made any dramatic difference to the sustainability of Hurst because of the difficulties of reaching the station by means of transport other than the private car, as detailed above.”

9. CONCLUSION

- 9.1. My evidence provides additional information which supports Reason for Refusal 4. The site is in an area which does not have good accessibility to local services by sustainable modes or the opportunity to transfer away from the car. This would be contrary to principles behind the Borough's design guidance and Manual for Streets and hence not lead to a reduction in the use of private motorised vehicles. It falls significantly short of helping to achieve the development plan objective of achieving a modal shift away from the use of unsustainable transport modes.
- 9.2. The NPPF sets "*a presumption in favour of sustainable development...*" it expects the planning system to "*...actively manage patterns of growth...*" (110) to ensure that "*...patterns of movement... are integral to the design of schemes... identifying opportunities to promote walking, cycling and public transport use*" (109).
- 9.3. To deliver sustainable development the NPPF accepts "*...that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways...*" (8 a-c Economic, Social & Environmental objectives).
- 9.4. When weighing the economic and social impacts of a development, the NPPF expects developments should "*...provide for attractive and well-designed walking and cycling networks with supporting facilities...*" (111) to strike an appropriate 'environmental' balance.
- 9.5. In summary I do not see the Appellants have provided sufficient confidence that a viable long term bus improvement strategy can be delivered. They have not exploited opportunities to make the location more sustainable nor shown how the proposals could meet the definition of sustainable development. The proposed contributions and pedestrian / cycle enhancements would be an improvement to the existing situation but would not make this site sustainable.
- 9.6. While some augmentation is proposed to pedestrian infrastructure surrounding the site, which reflects the absolute minimum residents would expect, I believe the proposals fall a long way short of the NPPF objectives. As such I do not consider the proposals can be considered sustainable development and respectfully suggest the Inspector dismiss the appeal.

Appendix 1 – Bus Service 128/129 Timetable

Wokingham | Winnersh | Twyford | Sonning | Woodley | Reading
Wokingham | Winnersh | Twyford | Sonning | Reading

128
129

Mondays to Fridays except public holidays

	129	129	129	128	128	128	128	128	128	128	128	128	129	129	129	129	129
Wokingham Broad Street (Westbound)				0707		0915	1022	1127	1232	1337	1442	1528		1550	1655	1730	1810
Emmbrook Dog & Duck				▼		▼	▼	▼	▼	▼	▼	▼		1558	1702	1737	1817
Winnersh Crossroads				0715		0925	1032	1137	1242	1347	1452	1541		1607	1711	1746	1825
Hurst School Road South				0722		0931	1038	1143	1248	1353	1458	1547		1616	1720	1755	
Twyford Burton Close	0607	0632		0726		0935	1042	1147	1252	1357	1502	1552		1621	1725	1800	
Twyford Amberley Drive			0710	▼		▼	▼	▼	▼	▼	▼	▼		▼	▼	▼	
Twyford Crossroads	0614	0639	0715	0736	0835	0943	1050	1155	1300	1405	1510	1600		1630	1735	1810	
Charvil Wee Waif	0617	0642	0719	0740	0840	0947	1054	1159	1304	1409	1514	1604		1633	1739	1814	
Sonning opp old Fire Station	0620	0645	0723	▼	▼	▼	▼	▼	▼	▼	▼	▼	1625		1743	1818	
Sonning nr High Street	0621	0646	0724	▼	▼	▼	▼	▼	▼	▼	▼	▼	1627		1745	1820	
Sonning adj old Fire Station				0745	0844	0950	1057	1202	1307	1412	1517	1608					
Woodley Chequers	▼	▼	▼	0753	0852	0958	1105	1210	1315	1420	1525	1616	▼		▼	▼	
London Road The Drive	0627	0652	0734	0801	0859	1006	1111	1216	1321	1426	1531		1638		1754	1829	
Reading Friar Street	0636	0701	0748	0815	0911	1016	1121	1226	1331	1436	1541		1649		1806	1841	

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Reading | Woodley | Sonning | Twyford | Wokingham
 Reading | Sonning | Twyford | Wokingham

128
129

Mondays to Fridays except public holidays

11

	129	128	128	129	128	128	128	128	128	128	128	128	128	128	128	128
Reading Friar Street (Stop FC)	0640	0705	0710	0755	0820	0915	1020	1125	1230	1335	1440	1545		1655	1810	1845
London Road The Drive	0650	0717	0721	0809	0833	0926	1031	1136	1241	1346	1451	1559		1709	1824	1857
Woodley Chequers		0723	0727		0839	0933	1038	1143	1248	1353	1458	1605		1715	1830	1903
Sonning opp old Fire Station		0730	0733		0846	0939	1044	1149	1254	1359	1504	1611		1722	1836	1908
Sonning High Street (Westbound)	↓	0732	0734	↓	0849	0940	1045	1150	1255	1400	1505	1612		1724	1838	1909
Sonning High Street (Eastbound)	0655	↓	↓	0816	↓	↓	↓	↓	↓	↓	↓	↓		↓	↓	↓
Sonning adj old Fire Station	0656	↓	↓	0818	↓	↓	↓	↓	↓	↓	↓	↓		↓	↓	↓
Charvil Wee Waif	0700	0738	0739	↓	0855	0945	1050	1155	1300	1405	1510	1617	1637	1732	1845	1915
Twyford Amberley Drive	0706	↓	↓	0833	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓
Twyford Crossroads	0704	0744	0745	0839	0901	0950	1055	1200	1305	1410	1515	1623	1644	1739	1850	1920
Twyford Burton Close		0751	0751	0844	0907	0955	1100	1205	1310	1415	1520	1629	1650	1745	1856	1925
Hurst School Road South		0757	0757	0849	↓	1000	1105	1210	1315	1420	1525	1633	1654	1749	1900	1929
Winnersh Crossroads		0806	0806	0857	↓	1007	1112	1217	1322	1427	1532	1640	1701	1756	1907	1935
Wokingham Broad Street (Eastbound)		↓	↓	0905	0919	1015	1120	1225	1330	1435	1540	1648	1709	1803	1913	1941
Wokingham Rectory Road		0817	0817													

times in red run on school days only
 times in blue run on school holidays only

This journey serves Twyford Crossroads before Amberley Drive

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Maidenhead | Upper Wargrave | Twyford | Sonning | Woodley | Reading
 Wokingham | Winnersh | Twyford | Sonning | Woodley | Reading

127
128

Saturdays

	128	128	128	127	128	127	128	127	128	127	128	127
12 Wokingham Tesco					1107		1307					
Wokingham Broad Street (Westbound)		0827	0924		1121		1321		1536		1706	
Winnersh Crossroads		0834	0931		1129		1329		1544		1714	
Hurst School Road South		0840	0937		1135		1335		1550		1720	
Twyford Burton Close	0748	0844	0941		1139		1339		1554		1724	
Maidenhead Bridge Avenue				1013		1213		1413		1628		1750
Maidenhead Frascati Way				1019		1219		1419		1634		1756
Shire Horse				1025		1225		1425		1640		1802
Knowl Hill Square Deal Café				1029		1229		1429		1644		1806
Upper Wargrave Highfield Park	↓	↓	↓	1035	↓	1235	↓	1435	↓	1650	↓	1812
Twyford Crossroads	0754	0852	0949	1047	1147	1247	1347	1447	1602	1702	1732	1824
Charvil Wee Waif	0757	0856	0953	1051	1151	1251	1351	1451	1606	1706		
Sonning adj old Fire Station	0759	0858	0956	1055	1155	1255	1355	1455	1610	1710		
Woodley Chequers	0805	0905	1003	1102	1202	1302	1402	1502	1617	1717		
London Road The Drive	0811	0911	1010	1109	1209	1309	1409	1509	1624	1724		
Reading Friar Street (FC)	0820	0920	1020	1120	1220	1320	1420	1520	1635	1735		

Between Wokingham Tesco and Broad Street, these journeys run as service 121

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Reading | Woodley | Sonning | Twyford | Upper Wargrave | Maidenhead
 Reading | Woodley | Sonning | Twyford | Wokingham

127
128

Saturdays

	127	128	127	128	127	128	127	128	127	128
Reading Friar Street (Stop FC)	0825	0925	1025	1125	1225	1325	1425	1525	1640	1740
London Road The Drive	0836	0936	1036	1137	1237	1337	1437	1537	1652	1752
Woodley Chequers	0842	0942	1042	1143	1243	1343	1443	1543	1658	1758
Sonning opp old Fire Station	0848	0948	1048	1149	1249	1349	1449	1549	1704	1804
Sonning High Street	0850	0950	1050	1152	1252	1352	1452	1552	1707	1807
Charvil Wee Waif	0856	0956	1056	1158	1258	1358	1458	1558	1713	1813
Twyford Waitrose	0901		1101		1303		1503		1718	
Upper Wargrave Highfield Park	0910		1110		1312		1512		1727	
Knowl Hill Square Deal Café	0916		1116		1318		1518		1733	
Shire Horse	0920		1120		1322		1522		1737	
Maidenhead Frascati Way	0927		1127		1329		1529		1744	
Maidenhead Bridge Avenue	0930	↓	1130	↓	1332	↓	1532	↓	1747	↓
Twyford Crossroads		1001		1203		1403		1603		1818
Twyford Burton Close		1006		1208		1408		1608		1823
Hurst School Road South		1010		1212		1412		1612		1827
Winnersh Crossroads		1016		1218		1418		1618		1833
Wokingham Broad Street (Eastbound)		1023		1225		1425		1625		1839
Wokingham Tesco		1030		1232		1432		1632		

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Appendix 2 – Letter from Thames Valley Buses relating to 128/129 Service

24 January 2023

Dear Andrew

Subject Access Request

Thank you for your correspondence of 12 December 2022, in which you asked for some information via our customer service interface about our services:

"I am writing to enquire whether your company is able to provide me with historical daily records showing actual bus arrival and departure timings for service 128/129 at School Road, South, Hurst. I am particularly interested in cancellations and delays, and if possible for a year ending with today's date."

I am pleased to be able to respond with some relevant information and apologise for the time this has taken to be collated.

As you may be aware, School Road South is served by routes 128/129 which run between Wokingham and Reading via Twyford. The route is operated by Thames Valley Buses under contract to Wokingham Borough Council, and we have been running the route since 2016 with some adjustments to the timetable and route over that period in an attempt to improve reliability. However, unpredictable traffic conditions along the A329, and more particularly in Reading and Sonning, does make this route susceptible to being less reliable than many others which we operate, and perhaps more noticeable given it operates broadly hourly.

The request for information at a single stop on a daily basis has some limitations to what we can provide. However, I can give you the overall route reliability for 128/9 as follows:

% of services operated running on time in 2022 (being regarded as between 1 minute early and 5 minutes late, all timing points along the route being referenced)

Jan	93.01	Apr	87.01	Jul	90.33	Oct	87.59
Feb	91.81	May	87.32	Aug	90.83	Nov	76.63
Mar	86.78	Jun	88.51	Sep	86.89	Dec	78.84

The marked reduced reliability in November and December has been attributed to roadworks on Reading Road at Winnersh.

We can give some information about School Road South in particular, but this is an enormous task for a 12-month period, so I have limited it to the last 3 months of 2022:

% of services operated running on time in 2022 (being regarded as between 1 minute early and 5 minutes late, at School Road South)

Oct	Towards Reading	79.45	Towards Wokingham	86.06
Nov	Towards Reading	71.43	Towards Wokingham	75.72
Dec	Towards Reading	69.34	Towards Wokingham	79.35

The second aspect of your request is about cancellation of services along routes 128/129. Occasionally we have to cancel a journey due to congestion or a vehicle defect, but cancellation of journeys due to lack of staff was almost unheard of before 2022. However, in common with many service and hospitality industries, the bus sector has been hit hard by driver shortages and this was an acute problem all last year, and particularly so in the autumn. Recruitment is now much better and our driver position has finally stabilised since mid-December and

Number of journeys or part journeys cancelled on routes 128/129 in 2022 (average number of journeys per month is 706):

Jan	16	Apr	27	Jul	12	Oct	84
Feb	9	May	16	Aug	69	Nov	58
Mar	42	Jun	1	Sep	46	Dec	10
						Jan	4 (to date)

To put these numbers in context, for the 12 months to August 2021 (when the HGV driver crisis began), we lost a total of 13 journeys, none of them being staff related.

Whilst not exactly the details asked for in your enquiry, I hope these statistics, plus the context of the narrative, is sufficient for your needs.

Kind regards