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Our Ref: WIE18916-115-090224-HighwaysResponse
Your Ref: 23/02094/FULMAJ
Date: 9th February 2024

Sent VIA EMAIL

Dear Matthew

23/02094/FULMAJ – Eagle Quarter II, Newbury – Highways

This letter sets out our response to the comments raised by the Local Highway Authority, West Berkshire Council (WBC), on the 19th January 2024 regarding the following planning application:

23/02094/FULMAJ: Full planning permission for the redevelopment of the Kennet Centre comprising the partial demolition of the existing building on site and the development of new residential dwellings (Use Class C3) and residents' ancillary facilities; commercial, business and service floorspace including office (Class E (a, b, c, d, e, f, and g)); access, parking, and cycle parking; landscaping and open space; sustainable energy installations; associated works, and alterations to the retained Vue Cinema and multi storey car park.

The layout of this letter details the conclusions from the WBC Highways response in **red** and is followed by the Waterman Infrastructure & Environment Ltd response underneath. A full copy of the Local Highway Authority's consultation response is provided as an attachment.

Insufficient information has been provided to assess the impact of the additional traffic generated by the proposed development with regard road safety and the flow of traffic. In particular clarification to determine the level of additional traffic impact and whether the Council's VISSIM traffic model should be used to assess that traffic impact. As such the proposed development is contrary to Policies CS5, CS13 and CS14 of the West Berkshire District Core Strategy 2006 to 2026 and the National Planning Policy Framework.

We will reach out again to WBC Highways to obtain the required information from the VISSIM traffic model. Email request sent to Paul Goddard at WBC Highways on 06.02.2024.

If received, then information from the VISSIM traffic model would then be used to assess the impact of any increase in traffic from this development, focusing on the A339 / B3421 Bear Lane / Kings Road junction and the A339 / Cheap Street junction.

The proposed layout does not comply with the Local Planning Authority's standards in respect of motor vehicle parking, and this could result in on street parking in the vicinity, adversely affecting road safety and the flow of traffic. As such the proposed development is contrary to Policy CS13 of the West Berkshire District Core Strategy 2006 to 2026 and Policy P1 of the Housing Site Allocations DPD 2006-2026 and the National Planning Policy Framework.

The technical work submitted in support of the planning application has sought to demonstrate how the provision of 475 parking spaces would be appropriate to accommodate the predicted parking demand. The proposed parking provision includes 83 spaces within a new undercroft car park and 392 spaces within the Kennet Centre Multi-Storey Car Park (MSCP).

The key points that informed this conclusion are summarised as follows:

- The site is located in a **highly sustainable location**. The site is very well located to local services and facilities, and the level of existing pedestrian/cycle/public transport infrastructure provides a realistic opportunity for future residents to undertake most local journeys via sustainable transport modes. Residents of the site will not, therefore, be reliant on private car to access essential goods and services, which will in turn facilitate reduced car ownership.
- The development incorporates **considerable sustainability elements** which most other town centre residential developments do not include. On-site amenities for residents include residents' lounges, workspaces, leisure and gym facilities, extensive cycle parking, 3 car club spaces, electric vehicle charging points, roof terraces, and other ancillary facilities. While town centre facilities are accessible generally, they cannot be compared to having facilities directly on a site and specifically available to residents. As stated above, residents will not be reliant on private car to access services, which will in turn facilitate reduced car ownership.
- Census data supports the concept of **low car ownership within Newbury town centre**. Census data indicates local car ownership levels of 0.63 cars/vans per household in 2011 and 0.68 cars/vans per household in 2021 (provisional estimate). This sets a clear precedent that a significant proportion of existing residents can live without owning a private vehicle and can access key services and facilities via other means of transport, most likely by walking, cycling or using public transport. This further supports the argument for reduced car ownership.
- Parking survey results demonstrate that the existing **Kennet Centre MSCP (415 spaces) operates with sufficient spare capacity**.
- The scheme has **reduced the amount of commercial/office floorspace currently at the Kennet Centre** by 66%. This reduces the parking demand for existing commercial/office uses.
- There is a **lack of opportunity for on-street parking** in the area due to parking controls. Parking that cannot be contained within the site will be limited as residents of the site will not be eligible for residential parking permits for the surrounding highway network. The development would therefore not have an adverse impact on the on-street parking that surrounds the site as residents would not be eligible for a local parking permit and would therefore not be able to park within circa 1km of the site.
- There is **existing capacity within other town centre car parks** to cater for any overspill parking i.e. Parkway, Northbrook and the new Newbury Station Car Park. Residents can choose to pay to park in these car parks.
- Future residents will be made aware that there is **no allocated parking** prior to renting the property. This will encourage a higher proportion of residents who do not require a private vehicle to rent a plot within the proposed development.
- **Residents would be charged the prevailing going rate to park** within the MSCP or undercroft car park. There would be no discount available to residents.
- The proposed **land uses would each have different trip profiles** which results in the demand for parking varying throughout the day. The required level of car parking is available at the times of day when residents require it i.e. the parking demand for commercial is limited overnight when demand for residential car parking is at its highest.
- **Dual use of the MSCP by residents and non-residents is supported by WBC**, with commercial mainly by day and residential mainly by overnight. With the parking provision unallocated and

available on a first come first served basis this would enable the dual use of the MSCP by residents and non-residents (as accepted for the Market Street scheme).

- The consented Market Street development achieves a parking ratio of 0.58 spaces per apartment during the daytime and 1.1 spaces per apartment at night. This application achieves a parking ratio of 0.70 spaces per apartment during the daytime and 1.12 spaces at night. This level of **parking provision exceeds what was considered acceptable for the Market Street development.**
- The precedent for residential development close to the town centre which delivers a **lower parking ratio** than that provided in the local standards has been set by the Market Street development
- WBC noted in their response to the Market Street application that **providing fewer parking spaces would aid in reducing the number of private car trips.**

“The level of parking proposed also reduces the number of trips by private car to and from the site that would otherwise occur if additional allocated parking was provided. The site is clearly a location where it is possible for people to live, work and enjoy without the need for a private motor vehicle and so to include additional residential parking is unnecessary.”

Were residents to be provided with a higher proportion of parking, this may encourage the use of the private car when efforts should be focussed on promoting the uptake of sustainable travel modes, particularly for town centre sites such as this. The same principle should therefore also apply to this application.

- **Variable Message Signs** in Newbury display the availability of parking spaces, thus providing early information to enable drivers to redirect to a convenient location (should the Kennet Centre MSCP be full). The information displayed is updated automatically.
- A **Car Park Management Plan will be implemented** to monitor car park usage and ensure that the on-site demand for parking is being met.
- This is an **exceptional circumstance site** similar to that attributed to the Market Street development.
- The **similarities between the proposed development and the Market Street scheme are considerable**, particularly in respect of proximity to the train and bus stations, and the fact both have a MSCP on site. In fact, the Kennet Centre scheme has far more on-site facilities than the Market Street scheme. This is not the case for most town centre schemes in Newbury. We consider that a precedent has been set.

We consider the above information with regard to parking provision provides sufficient information/clarity for West Berkshire Council to support the proposals and remove this element of the objection. Regarding use of the VISSIM model we will continue to work with the Highway Authority to obtain this information so a full assessment of the development impact can be undertaken.

We would be grateful for a meeting to discuss these matters.

Yours sincerely



David Whalley
Associate Director
For and On Behalf of **Waterman Infrastructure & Environment Ltd**

Enc. WBC Highways Response

HIGHWAYS RESPONSE

To: Matthew Shepherd
Senior Planning Officer

Our Ref: 23/02094/FULMAJ

From: Paul Goddard
Highways Development Control
Team Leader

Your Ref: 23/02094/FULMAJ

Extn:

Date: January 19th 2023

The Kennet Shopping Centre, Newbury

Full planning permission for the redevelopment of the Kennet Centre comprising the partial demolition of the existing building on site and the development of new residential dwellings (Use Class C3) and residents' ancillary facilities; commercial, business and service floorspace including office (Class E (a, b, c, d, e, f, and g)); access, parking, and cycle parking; landscaping and open space; sustainable energy installations; associated works, and alterations to the retained Vue Cinema and multi storey car park.

Introduction

1. I refer to the Highways Response and Transport Assessment Addendum received on December 18th 2023. This is in response to earlier comments made on November 1st 2023.
2. This response will cover parking and traffic issues. Access and site layout issues will be considered in a later response, as I am continuing to liaise with colleagues regarding pedestrian and cycle routes around the site and the proposed changes to the Bartholomew Street / Cheap Street traffic signal junction.

Parking

3. As mentioned in the Highways Response, the previous planning application 21/00379/OUTMAJ included the provision of 575 parking spaces included the 83 undercroft parking spaces plus an additional floor of parking at the MSCP.
4. This scheme that was due to go to appeal in October 2023 proposed 367 flats. According to the Councils parking standards set out in Policy P1 of the Housing Site Allocations DPD, 423 car parking spaces would be required for this residential element.
5. The proposed level of car parking to the number of flats was ultimately found to be acceptable by the Local Highways Authority as there was the required level of car parking available at times of the day when residents would require it. Also, the Thursday to Saturday parking surveys submitted from November 2022 found that there was sufficient capacity in the car park for both residential and commercial car parking. This is shown in the table below that shows highlighted when there was sufficient car parking within the proposal for the required 423 parking spaces required for the residential element:

Time	Thursday survey	Available for residential	Friday survey	Available for residential	Saturday survey	Available for residential
07:00	11	564	16	559	34	541
07:30	15	560	20	555	51	524
08:00	23	552	21	554	67	508
08:30	31	544	34	541	76	499
09:00	50	525	58	517	97	478
09:30	82	493	89	486	157	418
10:00	111	464	106	469	190	385
10:30	147	428	131	444	243	332
11:00	177	398	182	393	277	298
11:30	189	386	179	396	283	292
12:00	194	381	186	389	280	295
12:30	191	384	188	387	286	289
13:00	201	374	195	380	301	274
13:30	194	381	203	372	306	269
14:00	193	382	204	371	303	272
14:30	188	387	201	374	284	291
15:00	176	399	188	387	266	309
15:30	159	416	173	402	239	336
16:00	143	432	166	409	204	371
16:30	119	456	142	433	201	374
17:00	111	464	120	455	199	376
17:30	115	460	123	452	174	401
18:00	98	477	113	462	168	407
18:30	74	501	90	485	153	422
19:00	71	504	84	491	123	452
19:30	76	499	81	494	117	458
20:00	75	500	83	492	103	472
20:30	71	504	86	489	102	473
21:00	64	511	77	498	111	464
21:30	59	516	76	499	104	471
22:00	59	516	71	504	99	476

Car parking availability within the Kennet Centre MSCP for residential with commercial – previous scheme

6. With the above, the LHA agreed to withdraw the reason for refusal on car parking grounds during discussions in August 2023 that contributed to the appeal being withdrawn.
7. Despite what has been mentioned with the Highways Response, the LHA continues to support the provision of dual use car parking with commercial mainly by day and residential mainly by overnight, but as mentioned previously the numbers must work.
8. This planning application now submitted; the revised scheme increases the number of apartments by 59 from 367 to 426. The scheme also removes the proposed additional floor of parking, which reduces the proposed parking provision on site by 100 parking spaces. Therefore, a total of 475 parking spaces would be provided including the 83

undercroft car parking spaces. Clearly there has not only been an increase in the number of apartments but then also a reduction in overall car parking levels of 100 spaces. This is a significant change to what the LHA thought was agreed during August of 2023.

9. Now according to the Councils parking standards set out in Policy P1 of the Housing Site Allocations DPD 471 car parking spaces are now required for the residential element.

Time	Thursday survey	Available for residential	Friday survey	Available for residential	Saturday survey	Available for residential
07:00	11	464	16	459	34	441
07:30	15	460	20	455	51	424
08:00	23	452	21	454	67	408
08:30	31	444	34	441	76	399
09:00	50	425	58	417	97	378
09:30	82	393	89	386	157	318
10:00	111	364	106	369	190	285
10:30	147	328	131	344	243	232
11:00	177	298	182	293	277	198
11:30	189	286	179	296	283	192
12:00	194	281	186	289	280	195
12:30	191	284	188	287	286	189
13:00	201	274	195	280	301	174
13:30	194	281	203	272	306	169
14:00	193	282	204	271	303	172
14:30	188	287	201	274	284	191
15:00	176	299	188	287	266	209
15:30	159	316	173	302	239	236
16:00	143	332	166	309	204	271
16:30	119	356	142	333	201	274
17:00	111	364	120	355	199	276
17:30	115	360	123	352	174	301
18:00	98	377	113	362	168	307
18:30	74	401	90	385	153	322
19:00	71	404	84	391	123	352
19:30	76	399	81	394	117	358
20:00	75	400	83	392	103	372
20:30	71	404	86	389	102	373
21:00	64	411	77	398	111	364
21:30	59	416	76	399	104	371
22:00	59	416	71	404	99	376

Car parking availability within the Kennet Centre MSCP for residential with commercial – current scheme

10. Now with the current revised scheme there are no times of the day ever that can be highlighted when the above mentioned car parking standards can ever be met. This, as outlined in the previous response from November 1st 2023 would be unacceptable. Therefore, in the Highway Response, several arguments have been put forward that are discussed as follows:

11. It is mentioned that the amount of commercial / office floorspace at the Kennet Centre from has been reduced from 23,492.84 sqm to 7,029.85 sqm, and therefore it is suggested that it is acceptable to reduce the car parking standard. But the LHA doesn't have any issues with the level of parking for the commercial use. It's clearly already sufficient from the consultant's own surveys, and the parking demand for commercial is limited overnight when demand for residential car parking is at its highest. I also disagree that reducing the amount of commercial floor area will significantly reduce car parking demand. People visiting Newbury town centre do not just use the Kennet Centre MSCP to visit a particular retail unit contained within it. They will park in the MSCP to visit the whole of the town centre, particularly with people travelling from the south or southern parts of Newbury. The Visual Message Signing provided within the town centre in circa 2010 with the Parkway development even encourages this for traffic from the south to reduce trips across the town centre.
12. I am informed that *the "development includes considerable sustainability elements including on site amenities for residents including residents' lounges, workspaces, leisure and gym facilities, extensive cycle parking, 3 car club spaces, electric vehicle charging points, roof terraces, and other ancillary facilities"*. I do not consider this to have much weight. For instance, there are already over ten gym facilities across the town centre. All town centre residential developments could then make that same argument to provide a lower car parking provision. Then with much of the other facilities, I would expect to see those in any case for any development.
13. Once again, the Highways Response includes census data, but once again as evidence based standards, this has already been considered within the parking standards set within Policy P1 that include the three different zones, with zone 1 in the town centre being the lowest, partly because of census data. The evidence and the way that it was used to set the standards were found to be sound by the planning inspector when they were examined in public during 2016 / 17.
14. I note that this is yet another development claiming that their development is somehow exceptional, based on the term used within Policy P1. That statement has so frequently been misinterpreted that it is being deleted in the draft local plan. If this development is exceptional then every other residential development within the town centre could make the same claim and no development would then ever comply with the parking standards that were set.
15. Frequently within the Highways Response, the Market Street development approved to the south with planning application 16/00547/FULEXT is mentioned. As mentioned within the Highways Response, that proposal was for 232 flats with 108 car parking spaces provided amongst the residential area of the site, a parking ratio of 0.58 spaces per flat. But what then seems to have been completely ignored by the applicants and their consultants is that the Market Street residents will have overnight access within the site to 150 car parking spaces that are used by the Council offices by day within the MSCP. This is secured by a car park management plan that was submitted and secured by condition. Therefore the 232 flats at Market Street have overnight access to 258 car parking spaces. This is a parking ratio of 1.11 spaces per flat. The Highways Response frequently mentions the supposedly similarities between the proposed development and the Market Street development. I am therefore more than happy that this scheme be considered in the same way with a provision of 1.11 spaces per flat, or this development complies with the parking standards set out in Policy P1.
16. There is a common misconception that I can allow non-compliance with the Council parking standards. But as the Councils highway case officer, I'm obliged to apply the Councils standards, and I've not seen any reason for me to persuade elected members

that their standards should not be supported. I therefore must again recommend refusal of this planning application on lack of parking grounds. And finally before it's requested, there is little purpose of a meeting in what would be an attempt to make me take a different view

Traffic

17. As mentioned in the previous highway response, the projected traffic generation rates and levels were agreed with the previous planning application and pre- application discussions that took place last summer. Traffic has been projected by using the Trip Rate Information Computer system in (TRICS) which is a traffic survey database covering Ireland and the UK. TRICS has survey samples of uses within the existing the site and that are being proposed, and its use is a standard methodology.
18. In summary for the existing site, it is projected the during the AM peak the site would have generated 93 vehicle movements 78 in and 14 out. During the PM peak the site would have generated 523 vehicle movements 229 in and 294 out.
19. In summary for the proposed site, it is projected the during the AM peak the site would have generated 122 vehicle movements 38 in and 83 out. During the PM peak the site would have generated 303 vehicle movements 150 in and 153 out.
20. There would have been an advantage if actual surveys had been made of the existing traffic movements. I have therefore obtained some data from colleagues in the Councils Parking Services team that may assist. The data shows the traffic flows in and out of the Kennet Centre MSCP, and is shown within the tables below:

Date	Peak	Arrive	Depart
06-Nov-23	08:00 to 09:00	25	6
	17:00 to 18:00	24	39
07-Nov-23	08:00 to 09:00	36	9
	17:00 to 18:00	25	39
08-Nov-23	08:00 to 09:00	40	8
	17:00 to 18:00	37	47
09-Nov-23	08:00 to 09:00	37	8
	17:00 to 18:00	49	25
10-Nov-23	08:00 to 09:00	58	7
	17:00 to 18:00	58	59
11-Nov-23	08:00 to 09:00	39	1
	17:00 to 18:00	58	0
12-Nov-23	08:00 to 09:00	21	0
	17:00 to 18:00	23	40

Traffic data on entry and exit Kennet Centre MSCP November 2023

21. The above figures are surprisingly low and do seem to at least align with the car parking surveys submitted by the applicants from November 2022. I still consider that the above use of TRICS is a robust approach, however these figures do suggest that the residential element will certainly increase traffic with the proposal, and therefore I do still consider that the as previously discussed, the Councils VISSIM traffic model should be used by the applicants to assess the impact of any increase in traffic from this development, particularly the area including and towards the A339 / B3421 Bear Lane / Kings Road junction and the A339 / Cheap Street junction.

22. However, I note from the Highways Response that the applicant's highway consultants consider that *"the impact of the associated development traffic on the operation and safety of the roundabout, is not considered to be 'severe'"*. Therefore they *"do not consider an increase of <30 vehicles requires use of the Councils VISSIM model to assess the impact at this roundabout"*. I therefore consider that this is a further reason for refusal. Again, I thought from the discussions last August that the applicants were willing to use the VISSIM model.

In conclusion

23. After what I considered was agreed during August 2023, I am disappointed with the submissions, and now must object to this proposal for the almost the same reasons as per the previous case as follows:

Insufficient information has been provided to assess the impact of the additional traffic generated by the proposed development with regard road safety and the flow of traffic. In particular clarification to determine the level of additional traffic impact and whether the Council's VISSIM traffic model should be used to assess that traffic impact. As such the proposed development is contrary to Policies CS5, CS13 and CS14 of the West Berkshire District Core Strategy 2006 to 2026 and the National Planning Policy Framework.

The proposed layout does not comply with the Local Planning Authority's standards in respect of motor vehicle parking and this could result in on street parking in the vicinity, adversely affecting road safety and the flow of traffic. As such the proposed development is contrary to Policy CS13 of the West Berkshire District Core Strategy 2006 to 2026 and Policy P1 of the Housing Site Allocations DPD 2006-2026 and the National Planning Policy Framework.

Paul Goddard
Highways Development Control Team Leader