

COMMITTEE REPORT

BY THE EXECUTIVE DIRECTOR OF ECONOMIC GROWTH AND NEIGHBOURHOOD SERVICES
READING BOROUGH COUNCIL
PLANNING APPLICATIONS COMMITTEE: 20th JULY 2022

Ward: Out of Borough

App No.: 220761 (South Oxfordshire Reference: P22/S1691/FUL)

Address: North Lake, Caversham Lakes, Henley Road

Proposal: Change of use of an established lake for recreation and sports purposes

Applicant: Cosmonaut Leisure Ltd

Date received: valid by SODC on 12th May 2022

Application target date: SODC target date: 11th August 2022

RECOMMENDATION:

That South Oxfordshire District Council (SODC) be informed that Reading Borough Council raises an **OBJECTION** to the proposal on the following transport grounds:

1. Insufficient information has been submitted with the planning application to enable the highways, traffic and transportation implications of the proposed development to be fully assessed. From the information submitted, it is considered that the additional traffic likely to be generated by the proposal would adversely affect the safety and flow of users of the existing road network within Reading, contrary to Policies TRANS4 and TRANS5 of the South Oxfordshire District Council Local Plan 2035

2. That SODC is sent a copy of this report for their information and use.

1. INTRODUCTION

- 1.1 The Council has been notified of an application within the adjacent authority area (within South Oxfordshire District) which directly adjoins the Borough boundary in the eastern extremity of Caversham. The site currently has an undeveloped appearance and was formerly a gravel extraction pit, which ceased operation approximately ten years ago. The application site is 39.44 hectares in total which includes a large lake with a field to the north and an island in the south-west. A private access road leads to this site and other recreational facilities in the area centred around water-based facilities, including the Redgrave Pinsent Rowing Lake, a water ski lake, the Thames and Kennet Marina and an Environment Agency building (a district navigation office).
- 1.2 The application has been called to the Planning Applications Committee by Councillor Jacopo Lanzoni due to concerns over impact on the transport network and impact on the environment (in terms of waste management and noise).



Location plan

2. PROPOSAL

- 2.1 The application is for the retrospective change of use of a redundant gravel extraction pit and lake to water sports and recreational use. The North Lake is being used for non-motorised sports such as kayaking, open-water swimming and paddle-boarding. Typical hours are stated as being 0600-2000. No buildings are proposed, although the planning statement mentions the need for storage containers for equipment stores, reception, changing rooms, coffee shop.



Proposed Block Plan

RELEVANT PLANNING HISTORY

3.1 P20/S3501/FUL - Application Refused by South Oxfordshire District Council (SODC) for the following reasons:

1. *The full extent of the ecological impacts arising from the land clearance and other works associated with the implementation of the unauthorised change of use have not been adequately assessed within the supporting ecological appraisal. The District Council also considers that the development of the site since the submission of the application is likely to have resulted in further unquantified impacts upon important habitats and the integrity of the Local Wildlife Site. The District Council considers that the proposed development is likely to result in a net loss for biodiversity and the harm identified by the Council would not be outweighed by public benefits. The proposal is contrary to Policies ENV2 and ENV3 of the South Oxfordshire Local Plan 2035 and the National Planning Policy Framework.*

2. *Insufficient information has been submitted with the planning application to enable the highways, traffic and transportation implications of the proposed development to be fully assessed. The proposal does not demonstrate that the traffic likely to be generated by the proposed use and its ancillary activities can be safely accommodated by the existing road network, without adverse impacts upon highway safety. The proposal is contrary to Policies TRANS4 and TRANS5 of the South Oxfordshire Local Plan 2035 and the National Planning Policy Framework.*

3. *The proposed development would increase the number of vehicular movements along the site access road, which does not contain adequate provision for pedestrians. As significant parts of the proposed improvement works are on land outside the applicant's control, and there is no guarantee that consent for these would be forthcoming, the proposal fails to demonstrate a safe and convenient access route, contrary to Policies TRANS4 and TRANS5 of the South Oxfordshire Local Plan 2035 and the National Planning Policy Framework.*

4. The application does not provide sufficient information on the surface water drainage arrangement for the areas of hardstanding implemented within the site in connection with the proposed use. The proposal in its current form fails to comply with Policy EP4 of the South Oxfordshire Local Plan 2035.

3.2 Reading Borough Council's Planning Applications Committee commented on this previous application, objecting on the following grounds:

1. Insufficient information has been submitted with the planning application to enable the highways, traffic and transportation implications of the proposed development to be fully assessed. From the information submitted, it is considered that the additional traffic likely to be generated by the proposal would adversely affect the safety and flow of users of the existing road network within Reading, contrary to Policies TRANS4 and TRANS5 of the South Oxfordshire Local Plan 2035;

2. The proposed development does not comply with the Local Planning Authority's standards in respect of pedestrian facilities and, as a result, is in conflict with South Oxfordshire Local Plan 2035 Policies TRANS2 and TRANS5

4. CONSULTATIONS

4.1 SODC is carrying out its own consultations. RBC's consultation responses are outlined below.

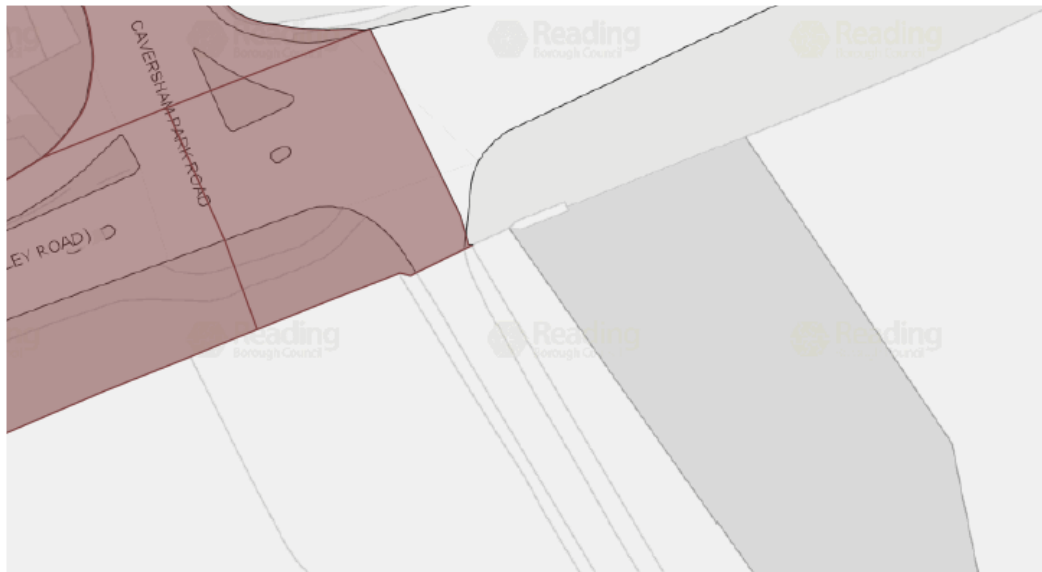
RBC Transport Development Control:

Pedestrian Access

The proposal includes a pedestrian route through the provision of an informal pedestrian route along the Access Road. The pedestrian route would run between the site and the northern end of the Access Road. Some of said route has already been completed with further works still to be undertaken.

To further support the pedestrian route, warning signs will be implemented along the access road to warn drivers of the potential for there to be pedestrians walking along the route.

In addition to the above, a pedestrian route has been included between the on-carriageway facility and the dedicated footway along Henley Road to ensure a complete connection. This provision consists of a 1.8m wide footway to be provided alongside tactile paving and dropped kerbs, this is accepted by the Highway Authority but would require the provision of a S278 Agreement given that the grass verge in question is adopted Highway within Reading Borough. Please see the extract below and the Highway Extent plan attached.



In addition to the facilities to support pedestrian movements, speed cushions are to be introduced along the Access Road, between Henley Road and the site. Speed cushions will be placed at 70m intervals, in accordance with the guidance contained within LTN 1/072. It is accepted that the presence of speed cushions will ensure that vehicle speeds are kept low, and therefore pedestrian and cycle safety will be improved, however, as illustrated on Drawing 2011-019 PL02A the speed cushions are located within the pedestrian route and therefore this would create difficulty for pedestrians especially those with buggies etc. Although the detail of this is located within the South Oxfordshire authority boundary, the design not promote the use of alternative modes and therefore the Reading Borough Highway Authority request that the proposed traffic calming is revised to accommodate the pedestrian movements.

It is noted that the proposal does not include the provision of lighting along the footway and this has previously been of concern given that events during winter months have been advertised on the Caversham Lakes website including weddings, parties and other events such as Oktoberfest Beer Festival, Halloween Fright Night, Fireworks Night and Christmas parties. Current events being advertised include swim by moonlight and summer solstice. All of these events could result in pedestrian movements in the dark leading to potential conflict, however this would need to be further assessed by South Oxfordshire as this section of the access road is within their authority boundary.

Highway Impact

Existing Flows

To ascertain existing vehicle movements along the Access Road, the applicant commissioned an Automatic Traffic Count (ATC) from 24 August to 30 August 2021. The ATC was positioned on the bridge located along the Access Road, and as such, all movements to and from the Water Park were recorded as well as those generated by the Thames and Kennet Marina, the Redgrave Pinsent Rowing Lake, Thames Traditional Boat Society and ISIS Water Ski & Wakeboard Club.

It is accepted that the traffic survey would have been undertaken during one of the busiest periods for the Water Park i.e. school holidays including a bank holiday and therefore is deemed to be a robust assessment of the flows along the access road. A summary of the flows recorded during the traffic survey is outlined within Table 4.1 and Table 4.2 below.

Table 4.1 outlines the average 5 day, 7 day and weekend flows for different time periods. along the Access Road.

Table 4.1 Average Flows between 24 August and 30 August 2021

Traffic Volumes	Access Road		
	5 Day Average	7 Day Average	Weekend Average
08:00 – 09:00	62	65	75
12:00 – 13:00	149	155	170
17:00 – 18:00	140	134	117
Daily	1,671	1,690	1,740

Source: K&M Traffic Surveys

The above table only provides the total amount of movements within the times specified and does not indicate the percentage of travel in a north or south direction. I have undertaken my own assessment of the raw data and can confirm that the split within the 5 day and 7 day week AM, PM and 12-13 peaks are relatively even. It is only the weekend assessment that generates a more distinctive split with the AM peak generating an average of 67% heading south and 33% north and in the PM peak the flows average at 39% heading south and 61% heading north, the 12-13 peak is still roughly a 50/50 split.

It should also be noted that the daily flows presented in the table above are the full daily flows so are between the times 00:00 and 00:00. The breakdown per day presented below only provides a reduced account of the daily flows. It should also be explained that although the heading below states that the daily flows are for between 07:00 and 19:00 they are in fact for the hours of 06:00 and 22:00. This is in fact a better assessment as this takes account of the full opening hours of the proposed use and as such is accepted.

Table 4.2 Daily Flows (07:00-19:00) between 24 August and 30 August 2021

Traffic Volumes	Access Road		
	Northbound	Southbound	Two-way
Tuesday 24 th Aug	860	881	1,741
Wednesday 25 th Aug	795	836	1,631
Thursday 26 th Aug	806	839	1,645
Friday 27 th Aug	756	808	1,564
Saturday 28 th Aug	813	836	1,649
Sunday 29 th Aug	862	866	1,728
Monday 30 th Aug	786	753	1,539

Source: K&M Traffic Surveys

The Reading Borough Highway Authority are therefore content that the surveys undertaken and are presented above represent a reflection of the number of movements along the lane during the time of operation.

To gain an understanding of the traffic flows along the wider highway network the applicant has undertaken a review of Department for Transport (DfT) vehicle count points. This review established that a DfT count point is located on the A4155 Henley Road immediately east of the Access Road. The Highway Authority is content that the 2019 traffic count data has been used as this removes any discrepancies as a result of COVID and having reviewed the DfT website, it is established that the data was undertaken by way of a manual count. The 2019 Annual Average Daily Flow (AADF) for all motor vehicles on this link is recorded as 17,661.

The applicant has provided the AM Peak Hour (08:00-09:00) and PM peak hour (17:00-18:00) flows and has stipulated these as being 1,413 vehicles and 1,590 vehicles respectively, however my assessment of the data calculates these flows as 1,317 in the AM Peak and 1,374 in the PM Peak.

Proposed Flows

In order to understand the number of trips generated by the Water Park the applicant has undertaken a review of the booking data for the period during which the traffic survey was undertaken (24 August to 30 August 2021).

It is accepted that the booking numbers during this period represent a worst-case scenario as these account for the bookings during the summer holidays, when the Water Park is likely to be at its busiest.

It is however stated that the Water Park consists of three components those being as follows:

- Aqua Park - Opening Times: 10:00-18:00. Sessions run for 50 minutes.
- Open Water Swimming - Opening Times: Vary by day and season. Sessions run for 60 minutes.
- Stand Up Paddle Boarding - Opening Times: Vary by day and season. Sessions run for 60 minutes.

It is however evident from the Caversham Lakes Website that this is not the case and other activities are available that have not been taken into account. These include family beach, private beach, party packages, yoga and fitness as well as general event booking space. All of the listed activities / events will result in a further provision of vehicle movements that have not been accounted for. It has also been stressed that comments on the previous planning application stated that should any of the events not take place during the surveys then further assessments will be required to establish what impact these events will have on the trip generation to the site, this current application provides no such assessment.

As such the Highway Authority cannot accept the assessment that has been undertaken by the applicant.

It should be stressed that during the course of the discussions in relation to the previous planning application it was agreed that a survey during the week in August would be accepted and that this could be assessed with a week in September once the Lakes had closed, to provide a comparison between the two, alternatively this could have been undertaken by undertaking surveys of the actual car park for the proposed use. Unfortunately, neither of these methods have been undertaken but they would have been a more accurate way in which to assess the number of vehicle movements that are generated by the development.

In addition to the above, the applicant has assessed the booking data against the traffic survey data to apportion a percentage of trips that would be generated by the proposal. Although RBC Highways would be content to accept this approach to calculate a daily percentage, this cannot be accepted to calculate the peak hour flows. The specific profile of vehicle movements for each use will differ and therefore it is highly likely that the peak hours will be completely different percentages than the daily assessment.

Likely Impact

Given that the Highway Authority has concerns regarding the assessment of the proposed flows, the outcomes specified by the applicant cannot be agreed.

Accident History

In order to gain an understanding of any potential accident or safety issues at the Access Road / Henley Road / Caversham Park Road junction the applicant has undertaken a review of Personal Injury Accident (PIA) data of the local area.

PIA data is collected by the police about road traffic incidents where someone is injured, the PIA data records the location of the crash, the severity of the accident (ranked either: Slight, Serious or Fatal), the cause of the crash, the vehicles or persons involved and the conditions.

The PIA data obtained from Thames Valley Police by the applicant is for the most recent five years (60 months) up to October 2021 for the vicinity of the site. This is accepted by the Highway Authority.

The PIA data outlined that for the area around the Access Road / Henley Road / Caversham Park Road junction a total of four accidents were recorded. The location of these accidents is outlined by the yellow dots in Figure 3.1 below, which has been taken from the Transport Technical Note.

Figure 3.1 PIA Locations



Source: Thames Valley Police

As outlined in Figure 3.1, two of the accidents occurred at the Access Road / Henley Road priority junction, with the other two accidents occurring to the west of the Caversham Park Road / Henley Road signal junction. All of the accidents were classed as slight, with only minor injuries being recorded.

Although the two accidents that occurred at the Access Road / Henley Road priority junction occurred in 2018 and 2019 respectively both accidents involved vehicles that were turning right into the Access Road.

The first accident occurred in March 2018 and involved a collision between two vehicles, one of which was turning right into the Access Road and on one of which was travelling southwest bound on Henley Road. The cause of this accident was related to the right turning vehicle failing to look properly.

The second accident occurred in October 2019 and involved a collision between three vehicles, one of which was turning right into the Access Road and two of which were travelling southwest bound on Henley Road. The cause of this accident was attributed to both speeding and careless / reckless driving from one of the vehicles travelling southwest bound on Henley Road.

It is noted that there were no recorded incidents relating to vehicles turning from the Access Road on to Henley Road.

The applicant has also undertaken a further review of the accident data for the Access Road / Henley Road / Caversham Park Road junction via open-source PIA data, from Crashmap, this assessment has been undertaken to account for the most

recently available 10 year period. The Crashmap data shows that during the last 10 years has only been one additional slight accident within the vicinity of the Access Road / Henley Road / Caversham Park Road junction and this also involved a vehicle turning right into the Access Road.

It is acknowledged that the accident record does not specifically identify an issue at the junction currently, but the proposed use will increase traffic turning right at the junction which could give rise to accidents at the junction. The application must therefore be thoroughly assessed before the Highway Authority can confirm or not whether the proposal would be safe.

Given the above, the Highway Authority would object to the proposal on the following grounds:

Insufficient information has been submitted with the planning application to enable the highways, traffic and transportation implications of the proposed development to be fully assessed. From the information submitted, it is considered that the additional traffic likely to be generated by the proposal would adversely affect the safety and flow of users of the existing road network within Reading, contrary to Policies TRANS4 and TRANS5 of the South Oxfordshire District Council Local Plan

RBC Natural Environment Team - No objection and it is assumed that South Oxfordshire officers will fully consider whether securing landscaping is a reasonable requirement for this application.

RBC Ecology Consultant - The Ecologist advised that any ecological impacts are likely to be mainly within South Oxfordshire. Therefore, it was advised that the South Oxfordshire District Council's ecologist should provide comments on this application.

RBC Leisure- No objections

Caversham and District Residents Association (CADRA) - A response has been received from the Caversham and District Residents Association (CADRA), who advise that documents submitted do not match the activities offered and advertised. Concerns were also raised over traffic safety and access to the site.

- 4.2 One member of the public also commented on this adjacent authority consultation in support. They stated: *"It's a great resource for my family to do something healthy and fun, close to home. A huge shame if this was lost."*

5. RELEVANT PLANNING POLICY AND GUIDANCE

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise. Material considerations include relevant policies in the National Planning Policy Framework (NPPF) - among them the 'presumption in favour of sustainable development'.

- 5.2 The following local and national planning policy and guidance is relevant to this application:

National Planning Guidance

National Planning Policy Framework

Local Plan

South Oxfordshire Local Plan 2035 (adopted December 2020)

Policies:

TRANS2 Promoting Sustainable Transport and Accessibility

TRANS4 Transport Assessments, Transport Statements and Travel Plans

TRANS5 Consideration of Development Proposals

ENV3 Biodiversity

CF4 Existing Open Space, Sport and Recreation Facilities

6. APPRAISAL

- 6.1 The main issues of potential significance to Reading Borough Council are in terms of traffic generation/highway safety and impact on the local visual environment.

(i) **Traffic generation/highway safety**

- 6.2 As set out above, given that the vast majority of the data submitted to establish the trip rate analysis from the applicant is not based on all activities that take place at the site. Activities such as family beach, private beach, party packages, yoga and fitness as well as general event booking space have not been taken into account within the submitted Transport assessments and will result in a further provision of vehicle movements that are currently unknown. As such, RBC as the immediately adjacent Highway Authority have significant concerns regarding the assessment of the proposal and as such it cannot be supported at this time.

- 6.2 As a consequence of the above, it is recommended that RBC should raise an objection on the basis of the relevant traffic generation and sustainable transport policies of South Oxfordshire's local plan.

(ii) **Impact on the local visual environment**

- 6.4 Apart from the highway aspects above, direct impacts on Reading Borough are likely to be very minor. It is not clear that there would be any detrimental impact on the landscape character of the area as observed from Reading Borough given the number of other trees in the vicinity. Officers assume that the container buildings would be permanent, but from their siting and landscaping in this low-level area, clear views from the Borough are considered to be unlikely. SODC will take into account on-site tree/landscaping issues and impact on the open countryside in an assessment against their own policies.

Other matters

- 6.5 There is understood to be no motorsport noise associated with the use, except for a motorboat used for staff/rescue use on the lake and again, this is something SODC would seek to control, were they to issue a planning permission.
- 6.6 Concerns was raised by Councillors over concern over waste management and noise pollution for both Reading residents and impact on the Local Wildlife Site. These matters would be considered in more depth by SODC with appropriate mitigation measures sought if appropriate.

7. CONCLUSION

- 7.1 For reasons of traffic generation which may affect Reading Borough, the recommendation of officers is to advise SODC of the objection as set out above.

Case Officer: Connie Davis