
REPRESENTING EMMBROOK RESIDENTS

2nd August 2015

Mr. Connor Corrigan,
Delivery Manager,
Development Management,
Wokingham Borough Council,
Shute End,
Wokingham,
RG40 1WR

Dear Mr. Corrigan,

Planning Application Nos. 150093 and 150036
Site Location: North Wokingham Strategic Development Location
Proposal: Reserved Matters for Matthewsgreen Farm Development Phase 1

I am writing on behalf of the Emmbrook Residents Association in response to the above reserved matters planning applications. It is noted that the application forms on WBC's planning website for the two applications are identical in all respects, and there is only one covering letter from the developer's agent which refers to the singular "enclosed application". The only difference that can be seen between the two is in the proposal description on the website. For application 150036 it states it is for sub-phase 1 covering conditions 3, 6, 12, 14, 27, 28 and 44 whilst that for application 150093 states it is for 100 dwellings (i.e. sub-phase 1) covering amenity space, garaging, parking, SUDs, and landscaping. Clearly there is some duplication between the two applications as condition 14 is for landscaping and conditions 27 and 28 are for parking. The obvious conclusion that can be drawn from this is that the applicant only submitted one application which has at a later date been split into two. The lack of any documentation from the applicant to the contrary suggests that this was done at the behest of the planning authority. However, whoever was responsible, it has been poorly executed and has only served to cause confusion, with many of the documents and plans relevant to 150036 appearing under 150093. As this has made it impossible for third parties such as ourselves to be certain exactly what the split between the two applications is, the following comments should be taken as applying to either or both applications as deemed relevant by the planning authority.

- 1) **Validity of submission** – Condition 3 of the outline approval makes it clear that any reserved matters given in Condition 2a) cannot be submitted and approved before Condition 3 is submitted and approved. In this respect the applicant is in breach of condition 3 by not submitting a standalone reserved matters application to discharge this condition before submitting any further reserved matters application/s. It has been suggested that were the planning authority to seek to strictly enforce condition 3 that the developer would simply challenge this. If that is indeed the case, we would appreciate the planning authority confirming whether there are any other conditions approved at outline

stage that they feel are unenforceable?

- 2) **Provision of street views** – we have previously requested street views, showing an “artists impression” (which in fact can be generated by design software) of how the new development will look against the existing developments from key approaches along Matthewsgreen Road and Emmbrook Road, with “before” and “after” images. These were first requested during our meeting with the developers in May, which they failed to provide. They were again requested in our meeting with planning officers in June. We understand the developer has been requested by the Council to provide these again. We consider these documents are very important in the context of what approval is being sought for, namely: *“Layout, landscaping, scale and appearance”*.

Consequently we consider it is not appropriate for a decision on reserved matters to be made until these street-level views have been made available for review and commented on.

- 3) **Appearance** - Architecturally the proposal offers nothing innovative or interesting in the design of the dwellings. It basically draws from common designs that can be seen being built anywhere around the southeast just rearranged to suit the site’s shape and topography. It can also be seen that the site layout follows the current fashion of grouping the buildings in small irregular blocks. This results in the site being dominated by roads and vehicle access ways in a manner that older style developments are not. This is demonstrated by the length of road per dwelling, which has been calculated from the drawings as 7.3m per dwelling. The equivalent typical figure for the existing Joel Park development is around 6.3m per dwelling, a figure it achieves despite not having any flats, compared with the 25% of flatted dwellings in the proposed development. Even the housing on Matthewsgreen Road, which consists of a range of different types and sizes, achieves 11.5m per dwelling although it occupies only one side of the road. This demonstrates that the proposed layout represents an inefficient use of land which has an impact on other aspects of the proposal such as the scale and mass of built form and hard landscaping and the provision of open space. This can be seen in the so called linear park leading from the balancing pond in the southeast corner towards the centre of the development. This in reality will be little more than a central footway separated by verges from the access roads serving the housing on each side.

In these aspects the proposal fails to comply with the National Planning Policy Framework Paragraphs 58, 63 and 64, and Core Strategy Policy CP3 a), d) and e).

- 4) **Layout (general)** - As pointed out in our response to the outline application (O/2014/2242) the layout fails to conform to the North Wokingham Masterplan principle 4a requiring the location of the community hub in the south east corner of the site to “reinforce the objective of integrating new and existing communities”. The excuse for not complying with this principle was the need to site a balancing pond in this corner. However the Phase 1 Layout (drg 2197-C-1105-B) shows dwellings sited around this pond, so clearly there was no physical reason why the community hub could not have been located here in their place. It is also noted that no effort has been made to “contribute to a sense of place in the buildings and spaces themselves and in the way they integrate with their surroundings, **especially existing dwellings**, including the use of appropriate landscaping” as required by Core Strategy Policy CP3 f). Indeed, the proposed retention and reinforcement of the hedging along the site boundary with the Toutley and Matthewsgreen Roads will in reality emphasise the separation of the new development from the existing.
- 5) **Layout (Balancing Pond)** – Notwithstanding our previous comment, we consider that careful design of the balancing-pond area, at a detailed level, is critical to ensuring it is maintained as a visually pleasing amenity. We would like to see further detail and consultation on the design of this area, including: visual presentation of the planting, impact of changes in water level, how wildlife would be attracted, potential for stepped access down to decked area at permanent level for use by school children for pond-

dipping, seating around the pond, etc.... We consider that the “Wokingham in Bloom” steering group would also potentially have much to contribute here.

- 6) **Layout (Community Orchard)** – We consider this is a positive use of this area, but would like to see a more adventurous approach, including greater focus on community gardening. Again, we would like to see further consultation on the design of this area, and again consider the “Wokingham in Bloom” steering group may potentially have much to add.
- 7) **Layout (Distribution of affordable properties)** – all the affordable housing for the site has been grouped in one single cul-de-sac which has been intentionally isolated from the rest of the development. We consider this is contrary to planning policy & guidelines, and is not reflective of an integrated and sustainable community. The Core Policy states that in order to comply with Policy CP2 regarding socially inclusive communities that affordable housing should be distributed around the development rather than concentrated in one area. The National Planning Policy Framework requires that councils should “...ensure an integrated approach to considering the location of housing...”. Grouping of all the affordable properties has also exacerbated the parking issue noted in the following point.
- 8) **Layout (Designated parking spaces)** – We have serious concerns about the impact of cars parking on existing roads adjacent to the development. Plots 1-24 have a total of 24 designated parking spaces (8 Allocated & 16 unallocated) plus 3 visitor spaces. Section 4 of the design statement notes a requirement of a parking ratio of 2.01 spaces per dwelling. These properties are all situated on a single cul-de-sac without reasonable access to parking spaces elsewhere in the development. It is reasonable, in planning terms to expect this cul-de-sac to meet the minimum parking requirements itself. In fact the cul-de-sac has less than half the required parking ratio. Most of these properties are 2 bedroom residences, and it is entirely reasonable to assume the majority of these will have residents with 2 vehicles. It is also highly likely that 24 properties will attract significantly higher than 3 visitor vehicles. We reasonably predict this could result in 15-25 vehicles parking on existing adjacent roads which are easily accessible by foot from all these properties. Given the introduction of a crossing at the end of Toutley Road, and existing parking restrictions on the bend prior to Emmbrook Vale, this means it is highly likely that many vehicles from the new properties will routinely end up parking outside existing properties on Toutley Road, Emmbrook Vale and Fullbrook Close.
- 9) **Layout (Impact and safety of new crossing on Toutley Road)** – the new crossing will mean that existing street parking will be significantly reduced in this area. At present this area is typically used by between 5-20 vehicles throughout the day. This peaks at school drop-off and pick-up times, as there are currently no alternative parking locations within close vicinity of the local schools, but is also used by secondary school pupils and those using the Emmbrook recreational areas throughout the day. Concerns were raised at the outline stage about what alternative plans were to be put in place to address this loss of on-street parking. No detail concerning these alternative plans has been forthcoming.

We also have concerns about whether adequate modelling has been carried out on whether the crossing is far enough away from the Matthewsgreen junction to ensure the safe use of the crossing. Has the impact of vehicles queuing back from the junction been adequately considered, in relation to visibility for pedestrians crossing from the new development side, and for vehicles turning right into Toutley Road? The dual lane approach will reduce impact, but is that sufficient?

- 10) **Layout (vehicular access across the green-link pathway)** – there appears to be vehicular access across the green-link walkway at the end closest to the existing footpath. Whilst it would seem this is initially necessary to access the properties on the north-west of the phase 1 site, this will not be necessary when access is provided off the NDR, and indeed should not be permitted in order to minimise the opportunity for rat-runs and also to ensure the safety of those using the green-walkway.

Turning now to the Sub-Phasing Strategy submitted to discharge Condition 3 of the outline permission we have the following observations and comments-

- 11) Para 1.6 states that Phasing Plan 2197-A-1018-E and 2197-A-1019-C were submitted to Wokingham Borough Council in February 2015, and were presented at Planning Committee. We consider this statement is incorrect, as the only sub-phasing plan submitted in February and available on the Council's planning website was 2197-A-1018-A.

We request that the plans mentioned (2197-A-1018-E and 2197-A-1019-C) are provided to us for review and comment.

- 12) It is also noted that Condition 3 of the outline application decision notice which requires the approval of this Strategy states that it should be based on Phasing Plan 2197-A-1023-A. The phasing plan that is included as an appendix to the Strategy is ref 2197-A-1102-A. This latter plan shows both the development in the southeast corner of the site and the Twyford Road roundabout and NDR up to the proposed site of the school as phase 1. The schedule of work, however, shows that the work on the roundabout and NDR starts 3 months after that on the development confirming that in reality they are two separate phases.

- 13) Para 2.3 first bullet point for Autumn 2015 states "Construction of Phase 1 development starts – temporary access via Old Forest Road". As the development site does not have a boundary on Old Forest Road, this statement is incorrect and it avoids the contentious issue of where the initial construction traffic will enter the site and for how long.

This should be corrected and available for review before further consideration given the importance of the issue to residents.

- 14) The sub-phasing strategy (section 1.11) also states "*the sub-phasing is dictated by the illustrative layout as presented in the approved Design & Access Statement.*" The final DAS (the approved one) contains the phasing plan consistent with 2197-A-1018-A.

If the sub-phasing strategy is "dictated" by the layout in the final DAS then why is the phasing detail contained in the rest of the sub-phasing strategy not consistent with the layout in the final DAS?

- 15) The sub-phasing strategy is intended to present and agree a sub-phasing strategy for the whole of the outline approval development. Section 2.2 notes that "*further phases are dependent on the decision by Wokingham Borough Council of the route of the NDR.*"

We do not consider it is appropriate or indeed in accordance with planning policy for the planning authority to approve a sub-phasing strategy that is entirely unclear regarding the majority of the development. It has been suggested in comments from the planning officer that Phase 1 of this development is not reliant on delivery of the NDR. We do not consider this reflects the approval given at outline approval stage, where it is clear that Phase 1 is one part of the approved development which was only approved on the basis of the NDR being delivered.

It would seem that by introducing ambiguity in the construction access and by tabling a profusion of phasing plans, the developers are trying to minimise the consequences of their renegeing on their original commitment to residents associations and ward councillors to route all traffic onto the site from the Twyford Road from the very start of work, as indicated by their original Phasing Plan 2197-A-1018-A.

It should be noted that the total opposition of local residents to the developer's current

plans to use Toutley Road via Old Forest Road as the initial access point onto the site can be seen from the responses the developers got at their Phase 1 exhibition in June, as stated in the developer's own Reserved Matters Consultation Summary.

- 16) We understand that recently the applicant has stated their intention to start work on the Twyford Road access in autumn this year rather than in winter, and the planning authority is endeavouring to facilitate the early construction of the NDR in the eastern section of the site.

Both these developments are welcome, but the comments above are for the submitted sub-phasing strategy and remain valid until a revised one is submitted.

In conclusion, it is noted that even if these two applications were to be approved in their current form, there are numerous other conditions that need discharging before construction can begin. The outstanding ones of most interest to local residents being conditions 9 and 33, requiring approval of the Construction Environmental Management Plan and the construction access(es) respectively.

Although the Council are not required to formally consult on condition applications, due to the significance of these two it would be appreciated if you could advise us when they are received.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'P. Gallagher', with a horizontal line underneath.

Paul Gallagher
Chairman
Emmbrook Residents Association