
REPRESENTING EMMBROOK RESIDENTS

Dear sirs,

August 13th 2014

Planning Application F20141216 – objection

We wish to object to the above Planning Application. Apologies for the lateness of our submission, caused by holiday absence. We request that this objection be considered, and that we be given an opportunity to speak when this application is considered on 20th August.

We object on a number of grounds – the SANG as proposed does not mitigate or ameliorate the effects the proposed development will have on the Thames Basin Heaths SSSIs, it clearly fails to conform with the requirements of the Core Strategy for SANG provision, and it fails to allow for the Council's stated intentions in terms of the preferred route for the western end of the NDR.

Dealing with these points in turn, firstly the established purpose of SANG is to provide suitable alternative natural green space to existing sensitive green areas, which in this case are the Thames Basin Heaths SSSIs, in order to attract residents of new developments to use them rather than the SSSIs. Thus it is worthwhile assessing how well the proposed SANG will perform this function, by looking at the usage of similar nearby areas. The nearest similar area is the Millennium Arboretum. This is located approximately 600m to the South West of the application site, between Wayside off the Old Forest Road and the M4 motorway and is of a similar size to it. It is generally accepted in the area that the Arboretum is virtually exclusively used by local dog owners as a convenient area for the daily exercise of their dogs. Although it is a reasonably attractive green space in general, its small size and the noise pollution from the motorway mean that it has nothing to offer anyone minded to take a walk of any length in quiet green surroundings. As the proposed SANG is located next to the M4 and A329(M) motorways and their slip road on two sides it is clear that it will suffer from the same or worse environmental impacts as the Arboretum.

The Noise Assessment accompanying the application is of little value. Although it gives some noise measurement values it gives no data to show how well they represent the actual levels in the longer term and under the prevailing weather conditions. It relies heavily on the fact that there are no national levels set for SANGs in its support of the application and makes no attempt to assess the likely impact the motorway noise will have on the usage of the SANG.

From the above it can confidently be predicted that the usage of the SANG will to be very similar to that of the Arboretum, with perhaps the addition of workers from the nearby business estates using it for a short stroll during their lunch breaks. Consequently it can be concluded that it will have little or no impact in reducing the use made by the proposed development's residents of the Thames Basin Heaths SSSIs.

Secondly, examination of the Core Strategy shows that this application fails to conform to its green space requirements for the North Wokingham SDL as defined in Section A7.33 Landscape Structure; I quote:

a) A network of green spaces should be created including:

- i) Formal playing fields and children's play facilities to Wokingham Borough Council standards
- ii) Informal parks and recreational areas
- iii) Community gardens, orchards, allotments and a cemetery

b) A linear public park parallel to the A329(M) should be created, which should provide mechanisms for noise mitigation. The linear form of this corridor should be opened up in places to provide playing

fields and formal open space. It should incorporate the SANG (and therefore subject to SANG criteria), and accommodate the flood plain to ensure flood mitigation.

c) The network of open space should integrate with Cantley Recreation Ground to enhance local amenity.

Similarly Section 4 of the North Wokingham Strategic Development Location SDP goes on to state that the Core Strategy requires "a well connected network of open space to include provision for formal and informal recreation, SANGS provision, and mechanisms to mitigate against noise and odour".

Taking these points in turn does the proposal:

- Form part of a network of green spaces?
No, it is a standalone area outside of the SDL boundary
- Contribute to a linear park parallel to the A329(M)?
No, it is separated from the other green space provision of the proposed development by the existing business estates. This is in contrast to the SANG being provided by the Kentwood Farm development which do form a linear feature with the other green space provision
- Provide mechanisms for noise mitigation.
No, again in contrast to the Kentwood Farm development
- Integrate with Cantley Recreation Ground?
No
- Contribute to a well connected network of open space?
No

In summary, in spite of our planning regulations which are biased in favour of development at virtually any cost, it is difficult to see how this application can be approved as it clearly will not mitigate or ameliorate the effects the proposed development will have on the Thames Basin Heaths SSSIs, and as it clearly fails to conform with the requirements of the Core Strategy.

Thirdly, and equally importantly, the application fails to take account of the Council's preferred route for the western end of the NDR in that it is placed across an area which that preferred route is due to cross. The route itself has been established as a result of extensive consultation responded to by a very large number of residents which showed overwhelming support for this alternative offered by the Council. If the SANG were to go ahead as currently proposed, this would mean that this route could not happen, and current Council thinking is that the route would need to be modified such that it would in effect become much more like a previously offered alternative roundly rejected by residents.

It thus follows that this application takes no account of either the Council's or the residents' preferences, and given that the developers know both of these things, is inappropriate and demonstrates a lack of regard for both parties.

So, the application should be rejected as it neither offers a space likely to be used for the purpose for which SANG is provided because of noise issues, nor does it conform with the Council's own stipulations for SANG provision, and finally it knowingly flies in the face of the Council's and residents' wishes in terms of the routing of the NDR.

regards



Paul Gallagher
Chairman, Emmbrook Residents' Association