



Emmbrook Residents' Association

Chairman
P. Gallagher
10 Ashton Road
Emmbrook, RG41 1HL
0118 989 1176
chairman@emmbrookresidents.org

ONE VOICE

REPRESENTING EMMBROOK RESIDENTS

10th July 2016

Ms. Sophie Morris
Planning Officer,
Development Management,
Wokingham Borough Council,
Shute End,
Wokingham,
RG40 1WR

Dear Ms. Morris,

Planning Application No. 160765 Re-submission
Site Location: North Wokingham Strategic Development Location
Proposal: Re-submission of Reserved Matters Application for Matthewsgreen Farm
Development Phase 2A

I am writing on behalf of the Emmbrook Residents Association to submit our revised and additional comments following the submission of revised plans by the applicant. Some of our comments remain the same as in our original submission dated 18th May 2016, but for the sake of clarity they have been reproduced here so that this submission replaces the original one in its entirety.

Development density – Paragraph 5.0.8 of the Design Statement states that the “*gross density*” of the development is 22 dwellings per hectare; this highly misleading figure is based on the gross area of this phase of the development. The same paragraph states that “*approximately fifty per cent of the Phase 2 site comprises open space with an area of streamside recreational park in the northern section the site*”. This open space, part of which actually consists of flood plain and surface water attenuation ponds, is part of the open space provision for the whole development site required by the Adopted Managing Development Document Policy TB08. As such it cannot be considered as incidental open space, and therefore cannot be included in the density calculation. This means that using the developer’s own figures the actual density of the developed part of the site is nearer to 44 dwellings per hectare.

Noise – It can be seen from the Technical Note on Noise, submitted in the discharge of conditions application 160914, that the dwellings that will suffer the worst levels of noise

pollution, requiring higher sound reduction index (SRI) windows, are those nearest the Twyford Road and the NDR. This again raises questions previously voiced by the ERA concerning the current practice of placing the higher density development beside such roads.

The Technical Note states that the noise modelling is based on projected 2026 traffic figures, and calls for both the blocks of flats and 13 of the houses to be fitted with higher SRI windows, as well as noise barriers being used to protect some of the gardens. This gives an indication just how noisy this site will be. It is not clear whether the projections include the impact of the future widening of the M4 to four lanes. Although this may have little direct impact on the noise levels here, the increase in traffic on the A329(M) that it will generate will have. This is of particular importance as the A329(M) has a concrete surface and, as it is not “owned” by the Highways Agency, but by WBC, it is unlikely to see any improvements to reduce noise in the foreseeable future.

Appearance and layout - Architecturally the proposal offers nothing innovative or interesting in the design of the dwellings. It seems at odds with the design statement which refers to this site having the “opportunity for a unique architectural style”, and fails to recognise the significance of this site being the “gateway” into the development. 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. The layout has also resulted 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 5.5m 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 40% 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. The developer’s architects have often stated that this older style of linear development is no longer considered appropriate. However, they have also said that cul-de-sac development is similarly considered unacceptable, although in this case the proposed development consists of nothing else but cul-de-sacs.

It is noted that the two 3 storey apartment blocks have been redesigned to reduce their bulk and give a more modern appearance. Although the design of these blocks may be considered acceptable in themselves, they do not sit well with the more vernacular style of the adjacent houses. This is particularly noticeable in the street scene F-F on drawing 1111.P1.500 rev F, where their blocky flat roofed architecture contrasts jarringly with the more traditional ridged roof design of the adjacent buildings.

Parking provision – It is noted that the Parking Provision Plan 1111.F2.403 shows that all the garages and car ports have driveway parking for at least one vehicle in front of them. Also, of the allocated parking there are 43 instances of tandem parking, with 34 of these also in front of garages. Although the Design Statement states that the parking provision meets WBC’s requirements for quantity, this aspect of the affected parking spaces will severely limit their usage as residents will be reluctant to block a vehicle in with another. This will lead to inappropriate parking including the use of the visitor and unallocated spaces. This is a common feature throughout the site which will lead to verge and other forms of inappropriate parking.

We also have particular concerns about the parking allocation for the private apartment block, which is restricted to one parking space per dwelling. Also, it is noted that the allocated parking for the affordable apartment block and the 6 affordable houses on plots 13 to 18 is less than one per dwelling. Whilst we note overall parking space numbers have been

based on WBC calculations, the parking allocation for the apartment blocks and plots 13 to 18 falls significantly below the average allocation (approx. 50%), despite half the apartments and all of the houses being 2-bed properties. It is reasonable to conclude, noting the location of this development, likely demographic, and proximity of public services, that the majority of these properties will be occupied by owners with at least 2 cars. This is further exacerbated by the existence of only 2 visitor spaces, in the vicinity of these properties, to cater for 30 properties (24 apartments and plots 13-18). Taking account of all this it is reasonable to conclude that parking provision will be insufficient by around 15 spaces. We consider WBC should be using its discretion to consider all relevant local factors (including points mentioned here) in determining suitability of parking provision for this application.

Refuse collection – Although the Design Statement claims in paragraph 4.2.4 that key information has been supplied on refuse collection it is far from clear what is proposed here. In fact the situation has been made more confusing as the legend for the Site Layout 1111.F2.400 rev Z shows a symbol for bin collection point/s although there are none shown on the actual plan! The inference here is that the refuse/recycling vehicles will have to stop at various unspecified points throughout the development to carry out the collection. This will lead to the only egress to the development being blocked for some considerable time whilst this was carried out, due to the limited widths of the roads and access ways.

Flatted Developments – The design statement notes that the two apartment blocks have small gardens with sitting space. These so-called communal gardens are required to serve 24 dwellings, half of which are 2-bed properties, we consider the provision is totally inadequate. The areas are fragmented and can only be regarded as infill between the blocks and the adjacent buildings and the site's boundary with the NDR and roundabout. Also, the 2026 Noise Profile shows that in both cases the green space adjacent to the blocks will be heavily polluted by noise from the roundabout and the NDR. The balconies that have been included in the new design of the blocks that face the roundabout and the NDR will suffer the same noise pollution which will clearly have a significant adverse impact on their amenity value.

Conclusion

As explained above the true density of the developed part of the site is approximately 44 dwellings per hectare. This figure is far higher than the average density required by the Core Strategy for the North Wokingham SDL, which is stated to be between 30 and 35 dwellings per hectare in paragraph A7.38. The layout, which consists solely of cul-de-sacs, has also resulted in an inefficient use of land. Similarly, the inclusion of so many tandem parking spaces will lead to an inefficient use of them as residents try to avoid blocking one vehicle with another. In view of the above, and the lack of external amenity space of adequate quality for the two blocks of flats, the overall design and layout is unsatisfactory. The result is a development that is dominated by built form and hard landscaping that will be subjected to traffic noise offering little amenity value to its residents. Due to these issues the development cannot be considered to comply with the following –

National Planning Policy Framework Section 7 requiring good design with particular reference to paragraphs 58, 63 and 64

Core Strategy Policy CP1 10)

Core Strategy Policy CP3 a, b, e and f

WBC Borough Design Guide – Section 4, Provision of Amenity Space

Yours sincerely,

A handwritten signature in black ink, appearing to read 'P. Gallagher', with a horizontal line extending from the end of the signature.

Paul Gallagher
Chairman
Emmbrook Residents Association