



**Emmbrook Residents' Association**

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## ONE VOICE

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### REPRESENTING EMMBROOK RESIDENTS

3<sup>rd</sup> August 2016

Mr. David Smith,  
Planning Officer,  
Development Management,  
Wokingham Borough Council,  
Shute End,  
Wokingham,  
RG40 1WR

Dear Mr. Smith,

**Planning Application No. 161839**

**Site Location: North Wokingham Strategic Development Location**

**Proposal: Full application to construct 128 dwellings at Bell Farm and an outline application for the construction of a section of the Northern Distributor Road**

I am writing on behalf of the Emmbrook Residents Association in response to the above combined application. Taking the application for the construction of the Northern Distributor Road (NDR) first, we have no comments to make on it as it conforms to the design principles for the road set by Wokingham Borough Council. The one aspect that is to be welcomed is the alignment of the foot and cycle way to the north of the carriageway in place of the original alignment within the boundary of Cantley sports field, which would have had a negative impact on the sports pitches.

Regarding the application to construct 128 dwellings on Bell Farm we note that the design and layout is very similar to that of the two applications for Phases 1 and 2a of Matthewsgreen Farm. As our comments on the lack of ambition in the design of these schemes and their inefficient use of land resulting in a preponderance of built form and hard landscaping were, as expected, ignored we see little point in repeating them here, and thus confine our comments to the following issues.

#### **Air Quality - Road Emissions**

The Air Quality Site Suitability report submitted with this application states that the levels of Exhaust Emissions of NO<sub>x</sub> and PM<sub>10</sub> from traffic would be well within current national standards. These conclusions have been based solely on current traffic levels and the distance of the proposed development from the A329(M). They do not take into account the

increases in traffic-generated air pollution that will occur when all the developments in the area have been completed; nor do they take into account the fact that the road that the development will front onto, Bell Foundry Lane, is to be part of the NDR. The only figures available for future year traffic modelling are those published as part of the outline application for Matthewsgreen Farm (ref O/2014/2242). These indicate that by the year 2026, which has been assumed to be the completion date for all the currently planned development, the traffic on Bell Foundry Lane would increase by 390% and 565% in the morning and afternoon peaks respectively. It also shows that the A321 Twyford Road, which forms the western boundary of the site, would similarly carry more traffic. There are two further points to be considered here:

This modelling does not include the traffic that will be generated by the development itself

And, the wind rose diagrams given on page 37 of the attached Odournet report show that the predominant wind direction lays between the West South West and South South West, directions which will blow any pollution from the NDR and the Twyford Road onto the site of the proposed development.

### **Air Quality - Odour**

The Air Quality Site Suitability report concentrates mainly on the impact the odour from the adjacent sewage treatment works will have on the proposed development. Although we are not in a position to challenge the odour dispersion modelling there are some glaringly obvious misleading statements and claims made in both the report itself and the Odournet Impact Assessment contained in the report.

It is stated on page 2 of the report that –

*My understanding from correspondence between Thames Water and Berkeley Homes is that an amenity buffer of c17-18m from the centre of the existing hedge line that forms the boundary of the site, has been incorporated into the proposed layout.*

The Site Layout plan 3035.111 rev C clearly shows that this is not the case, as plot 128 falls entirely within this distance, as does the bulk of the apartment block, plots 108 – 120, and all of its external amenity space.

Section 3.4 of the Odournet report, Odour Complaints History, states that no complaints have been received during normal operation over the last three years. It is noted that there is only one dwelling adjacent to the Works which lies to the south west of it. The next nearest dwelling is the Ashridge Farmhouse which lies c120m from the Works southern boundary, with all the dense residential developments in the area lying to the south of Warren House Road, c200m from the Works. As shown by the wind rose diagrams given in Annex E, all these dwellings lie on the predominately upwind side of the Works, so this lack of complaints is hardly surprising and cannot be taken as an indication of the acceptability of Bell Farm as a site for further residential development.

The Summary of the Odournet report asserts in Para 7.5 that 99% of the site would be amenable to development. This gives a misleading perception of the actual situation, as, due to noise from the A321(M) and flooding issues, only the southern third of the site is actually developable. The southeast corner of this area will be the most liable to suffer from odour, which is the area where the block of 13 apartments is located. Looked at from this point of view it can be seen that 10% of the proposed dwelling will be at risk of exposure to unacceptable levels of sewage odour.

Finally, and perhaps most importantly, the suitability of the site for development is predicated entirely on the assertion that Thames Water intend to improve the Works to reduce odour emanating from it to an acceptable level. It is noted Thames Water is entirely silent on this subject, so it is not clear what priority they place on this work, if any, nor when, if at all, it will be carried out. Indeed, with the increasing pace of development around Wokingham Town, the level of throughput of the site is likely to increase significantly, and we could see an increase in the odour emanations rather than a reduction.

## **Noise**

The issue of noise has been treated very much in the same manner as that of air pollution. That is that it is based solely on current conditions, with the impact of the extra traffic generated by turning Bell Foundry Lane into the NDR ignored. As pointed out in the section on air pollution this will cause a very significant increase in traffic, and hence noise, along this section of road. However, unlike the air pollution issue, here we do have some good indications of the true impact this will have on the dwellings adjacent to Bell Foundry Lane and the Twyford Road. This can be done by referring to the year 2026 noise modelling that was carried out for Phase 2 of the Matthewsgreen Farm development (ref Application No 160914, Technical Note for Discharge of Planning Condition 51). It is reasonable to do this as this Phase 2a development lies just to the west of the one in question here and borders the same section of the Twyford Road as well as a section of the NDR within the Matthewsgreen development. Examination of the published traffic modelling figures shows that this section of the NDR will carry virtually the same volume of peak traffic as the Bell Farm section and the dwellings are around the same distance from the roads. In this sense the two developments are mirror images of each other and it is reasonable to expect that they would be subjected to the same noise levels.

Section 3.0 of the SRL Noise Impact Statement states that the daytime façade noise levels across the Bell Farm development are expected to be in the range 50dB to 64dB. The equivalent figures from Section 3.0 of the MGF Phase 2 Technical Note are 50.1dB to 68.8dB. The Technical Note gives a breakdown of the figures for different areas of the development, and unsurprisingly, the areas adjacent to the NDR and Twyford road are the noisiest with figures of 52.5dB to 68.8dB.

In Section 4.2, the SRL Noise Impact Statement states that windows with a minimum sound insulation performance of 27dB would be sufficient to control noise ingress into the dwellings on the Bell Farm development. However, Tables 4.1 and 4.2 of the Phase 2 Technical Note show that at the dwellings located in areas most affected by traffic noise this figure would prove to be totally inadequate. They also show that a higher specification of 33dB reduction would not be sufficient in the noisiest areas where a reduction of 36dB would be required. Under the circumstances, there are no reasons not to conclude that the equivalent areas of the Bell Farm development will be subjected to very similar noise levels and that the 27dB minimum recommendation would prove to be totally inadequate once the NDR is fully operable.

It is also noted that although the representation of the site layout given in the SRL Noise Impact Statement is not particularly clear, it does not appear to accurately reflect that given on the Site Layout drawing 3035.111 Rev C provided in support of the application.

## **Layout and Appearance**

Architecturally the proposal offers nothing innovative or interesting in the design of the dwellings, and has little to distinguish it from the numerous developments being constructed around Wokingham at the present time. It is noted that as the two blocks of apartments have

been positioned at each end of the development to act as “focal buildings” their design is particularly disappointing as they completely dominate the neighbouring buildings. Considering that the apartment block in the Matthewsgreen Farm development planned for the other side of the Twyford Road has been reduced in profile to avoid this problem, the western block (plots 1 – 10) will be particularly obtrusive.

It is noted that neither apartment block has adequate communal amenity space considering the number of residents they are required to serve. What space there is likely to be dominated by traffic noise and not meet the WHO standards in this respect, with that for the affordable apartments also suffering from odour from the adjacent sewage treatment works.

## **Parking**

The planning statement says “*The level of parking proposed for the affordable housing is in accordance with information on the expected levels of car ownership.*” The level of parking provided for a mix of 2 & 3 bedroom properties is only the equivalent of one per property, and it should also be noted that these are unallocated, Noting the level of car ownership in Wokingham, and the fact that these properties are not within a short walking distance of reliable public transport, it cannot be possible that the parking provision is in accordance with the expected levels of car ownership.

## **Layout (Distribution of affordable properties)**

All but two of the affordable properties has been grouped in the one area of the development. The Core Policy suggests 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...”. The layout of affordable properties cannot be considered to be compliant with these policies. Grouping of all the affordable properties has also exacerbated the parking issue noted in the previous point, and due to their location in the south-east corner of the site represents a disproportionate exposure to potential odours from the sewage treatment works.

## **Summary**

It is clear that the traffic pollution analysis given in the Air Quality Site Suitability Report is an irrelevance as it makes no attempt to forecast the real levels of air pollution the site will be exposed to due to the intensification of traffic on the Bell Foundry Lane. If pollution here is expected to be an issue rigorous modelling of future year levels need to be submitted before approval of this application can be considered.

The conclusions of the Air Quality Site Suitability Report on the odour pollution from the sewage treatment works are not clear cut, as shown in the last paragraph of section 2.3.1 of the Odournet Report, which states –

*It is however very important to note that the choice of criteria for planning and development purposes will ultimately be defined on the basis of the risk appetite of the parties involved (e.g. Thames Water, the developer and the local planning authority).*

Also in the last paragraph of section 6.2 –

*The decision on what level of odour exposure is likely to be considered acceptable at the site and determination of the area of land that is available for development will*

*ultimately be determined based on the risk appetite of the parties involved (e.g. Thames Water, the developer and the local planning authority).*

One thing that is very clear however, is that the developer has opted out of taking this risk. They have done this by positioning 24 of the 26 affordable dwellings in the area most at risk of odour pollution, that is, the southeast corner of the site. In contrast, only a few of the 102 marketable dwellings are placed at a similar risk. The point is, of course, that the “parties involved” here who will be most exposed to the risk, and would be least able to avoid it, will be the residents of the affordable units who do not have a voice at this time.

From a planning perspective, the major risk regarding odour pollution is the uncertainty over Thames Water’s intentions regarding the upgrade to the sewage treatment works. Unless they are willing to provide a firm commitment to achieving odour levels acceptable to the Planning Authority on a long term basis and to achieve this in a suitably short time scale we submit that the planning application cannot be approved in its current form.

The section on noise clearly demonstrates that the noise modelling carried out on behalf of the developer is inadequate as it fails to follow the precedent set by the Matthewsgreen Farm Phase 2 application, which takes into account the significant increase in traffic on Bell Foundry Lane when it becomes part of the NDR. Unlike the ill-defined plan to reduce the odour from the sewage treatment works, the NDR is a fundamental part of Wokingham Borough’s Core Strategy requirements to offset the impact of development in the Borough, and sections of it have been completed or are under construction now, as is the case with the Matthewsgreen Farm section. Also Berkeley Homes themselves have included the construction of the Bell Foundry Lane section of it within this application, so it is entirely reasonable to expect that its impact on traffic noise be properly assessed as was the case with the Matthewsgreen Farm Phase 2 application. We therefore submit that this application cannot be approved until this omission is corrected.

The following planning policies and guidance are relevant to this application:

- The World Health Organisation Guideline for Community Noise and BS8233
- National Planning Policy Framework Section 7 requiring good design with particular reference to paragraphs 58 and 63
- Core Strategy Policy CP1 10)
- Core Strategy Policy CP3 a, b, e and f
- WBC Borough Design Guide – Section 4, Provision of Amenity Space
- North Wokingham SDL Supplementary Planning Document – Section 2.2.1, Ashridge Farm Sewage Treatment Works

Yours sincerely

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

Paul Gallagher  
Chairman  
Emmbrook Residents’ Association