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ERA

Emmbrook Residents' Association

ONE VOICE

REPRESENTING EMMBROOK RESIDENTS

Mr Daniel Ray
Development Management,
Wokingham Borough Council,
Shute End,
Wokingham,
RG40 1WR

12th December 2016

Dear Mr Ray,

PLANNING APPLICATION 163058 FOR THE REDEVELOPMENT OF THE HEWDEN SITE, OLD FOREST ROAD

I am writing on behalf of the ERA concerning the above planning application to build 45 dwellings on the site currently occupied by Hewden plant hire company. Although, as far as we are aware, Hewden have not proved a bad neighbour to the adjacent residences, its replacement by a residential development should be welcomed in this suburban area. However, having examined the proposal by the developers, Ashill, we feel that it leaves a lot to be desired and that we are unable to support it for the reasons set out below.

Scale and Massing

The various supporting documentation supplied with the application gives the site area as between .8ha and .85ha, which equates to a dwelling density of between 53 and 56 per hectare. Not only is this far higher than the more traditional style of developments such as Lenham Close, but is also significantly higher than the 30 to 35 per hectare specified for the Matthewsgreen Farm development in the North Wokingham SDL. This high density has been achieved by introducing a scale of development and massing of built form not found elsewhere in the area by providing only 3 floor terraced housing and a 3 floor and a 4 floor blocks of flats. This aspect of the proposal fails to conform to the Wokingham Borough Core Strategy Policy CP3a) regarding mass, built form, layout and height. Also relevant here are the Borough Design Guide Section 4 R1 and R2 requirements to contribute positively to the underlying character and context of the local area, R9 regarding building heights and R10 regarding density.

Appearance and Impact on the Area

The most significant interface with the surrounding area is the development's frontage onto Old Forest Road. This is where the developers have chosen to locate the two large blocks of flats, with the 4 storey one only some 5 metres from the boundary. The positioning of this large block adjacent to the road is compounded by

its architecture and height being starkly out of step with the local vernacular. This can clearly be seen from the examples given on page 13 of the Design and Access Statement. The Design and Access Statement also states that these blocks have been positioned here as "gateway features", although it is difficult to see why a small, linear development such as this is deemed to warrant such dominating features, as one glance down the access way would immediately establish its true nature. It is noted that the more recent developments of Arnwood, Forest Lodge and Wayside have not taken this approach, and although establishing their own character, sit comfortably with the local vernacular. In this context the proposal does not conform to the Wokingham Borough Design Guide requirement Section 4 R1 as above, R7 regarding building lines and R9 regarding heights.

The street scene from the access way within the development is dominated by the 8 dwellings on its southwest side. Although the developer refers to these as link-detached, in reality they form a terrace, as they are attached at the first floor and roof levels, but with 6 of them having front extensions that reach to within about 1 metre of the roadway as no footway is provided here. The view to the northeast of the access way consists of 14 car parking spaces fronting 2 terraces of 4 dwelling. As all the dwelling are 2.5 storey the street scene here will be one dominated by built form and car parking, offering very little in terms of variety in style of the elevations or roof lines or character and cannot be considered to be consistent with the requirements of Core Strategy Policies CP3a) and Borough Design Guide requirement Section 4 R11 regarding street scenes.

Amenity

The Borough Design Guide requirement Section 4 R18 states that "d*wellings must be designed to provide appropriate levels of daylight and sunlight to new and existing properties"*, with Figure 4.30 illustrating what is and is not considered to be acceptable shading of habitable room windows. It is clear that the first floor Bedroom 2 window of Plots 30 to 36 inclusive fail this test by a considerable margin, as they are located in the deep narrow recess formed by the front extensions of the dwellings. The lack of appropriate levels of light here is exacerbated by the windows facing northeast and by their small size, and can only be considered as unacceptable design. It is also noted that the windows of the habitable rooms on the rear elevation of Plot 23 would suffer similar shading from Plot 22.

The Borough Design Guide also states in R16 that *"New housing must provide easy access to some form of amenity space"*. With regard to flatted dwellings it goes on to say that they "*should have access to some form of amenity space, preferable in the form of private gardens or communal garden space*"; and that *"upper floor flat dwellers rarely have access to gardens"* and *"in such cases, it is important to provide private outdoor space in the form of balconies, upper level terraces or winter gardens"*. It is noted that the block of flats Plots 1 - 11 provides no private or communal garden space for its residence and only 5 of the flats are provided with balconies. The other block of flats fares somewhat better with some green space that could be considered suitable and with 4 of the flats provided with balconies.

This lack of adequate amenity space is considered unacceptable as the development offers no other on-site green space at all. This is in contrast with the Matthewsgreen Farm developments which include appreciable areas of play space and parkland on-site.

The same section of the Design Guide goes on to define the length of private garden space as 11m. The gardens of plots 12, 13, 16, 17, 26 and 29 to 36 are all under this

dimension, and although the shortfall may be relatively small in some cases the Guide does state the 11m as a minimum length not a target or average.

Arboricultural Assessment

The executive summary of the Arboricultural Impact Assessment states in section 1.7 that tree T15 is to retain its protected status given to it under Tree Preservation Order TPO 4543/2016. It is also shown as being retained on the Site Layout Plan 2465-A-1005-K and the Landscape Masterplan 1456-001C. However in the table given in section 3.3.2 of the Assessment tree T15 is shown as scheduled for removal. This ambiguity needs to be corrected to ensure that this TPO'd tree is not inadvertently cut down.

Section 3.10 deals with the shading of gardens spaces by the boundary trees. It is claimed that the analysis given shows that *"the resulting proposed layout is both supportable and results in juxtapositions between trees identified for retention and proposed plots which will not bring about future requests for excessive pruning and/or tree removal"*. This analysis is based on the modelling of the shading caused by the trees during daylight hours for the months from May to October. It is stated that this was done for the middle plots of the three blocks on the eastern boundary of the development, although the actual graphs claim to be for plots 24 and 27, which would be correct, and plot 30 which would be incorrect.

Although these graphs may give a good approximation of the shadowing caused by the trees they do not give a true picture of the overall situation, as they do not take into account the shadows the three blocks of houses themselves will caste. Paragraph 3.10.6 of the report states *"the analysis graphs for the plots indicate less than 20% overlapping shade evident from approximately 3pm throughout the months May to October"*. It is noted that this is around the time that the shadows of the blocks will start to have an impact on the gardens which will obviously increase with time. Furthermore, when this shadowing is taken into account it can be seen that plots 24 and 27 will not be the worst affected plots.

Shadowing will not be the only factor that will affect the utility and amenity of the gardens considering the area of them that is covered by the tree canopies. If the Site Plan 2465-A-1005-K reflects the spread of the trees accurately this exceeds 50% of the available area in at least four cases. This will have an impact on what can be achieved horticulturally and the amenity and utility of the area under the trees due to the fall of sap and honeydew and insect detritus during the summer months.

It is claimed that the juxtaposition of the retained trees and the dwellings is similar to that of some of the existing dwellings in the immediate area. However, it cannot be said that this is a sufficiently sound reason to justify propagating a similar juxtaposition here. A truer reflection on what should be considered acceptable is given from the outcome of the first two planning applications for the development 'Wayside' just the other side of the railway bridge on the northwest side of Old Forest Road. The dwellings on the northwest boundary of these proposals had a very similar relationship to the trees on the boundary as is the case here in that there was a similar coverage of the gardens by the trees. The applications were refused by the local planning authority and were subsequently appealed by the applicant (ref APP/X0360/A/05/1188138 and APP/X0360/A/06/1198366). These appeals were heard at the same inquiry, and the inspector's conclusions on this issue were summed up as follows and were fundamental to the dismissal of both appeals.

13. The houses backing on to the rear boundary would have gardens of a reasonable length, but because of the substantial tree spread of boundary trees, much of the gardens would be very close to the canopy of the trees. While these trees are to the north of the dwellings and therefore interference with sunlight would be minimal, there would be significant shading of skylight. In my opinion this would be overbearing in relation to occupiers in their houses and gardens and likely to lead to significant pressure for tree surgery, which given the overbearing impact would be difficult to resist. It is therefore likely to lead to an unacceptable impact on trees and the important screening amenity value that they provide.

The issue was finally resolved by a third application which increased the distance between the trees and the rear elevation of the dwellings to around 19m and was allowed at appeal (ref APP/X0360/A/07/2053279). Here the Inspector's comments were:

8. There are a number of trees protected by a Tree Preservation Order along the rear of the site, and there had been concern in previous proposals, considered at appeal, that they would be likely to have a detrimental impact upon these trees. However, in this scheme the houses at the rear have been sited further away from these trees and the Council's tree and landscape officer is now satisfied that they would be a satisfactory distance from the trees.

Car Parking and Traffic

The two car parking spaces provided for the four bedroom dwellings is in the form tandem parking. This form of parking for the dwellings that can be expected to have the highest occupancy rates on the development is unacceptable, as it will lead to inappropriate off plot parking as the residents will be reluctant to block one vehicle in with another.

The Transport Assessment concludes that the visibility splays at the existing site egress are appropriate based on the 85th percentile traffic speeds and can be used as the development's egress. This conclusion is questionable bearing in mind the influence the traffic light controlled one way working over the bridge has on traffic speeds. It is apparent that traffic that stops at a red light on the eastern side of the bridge will not have sufficient time to accelerate to a significant speed as it approaches the development's egress and that many drivers will drive over the bridge at a relatively low speed. However, there will be occasions when vehicles will cross the bridge at far higher speeds due to the drivers accelerating in order to 'beat the lights'. Although the cross over junction into the site has been in its present position for many years the significant increase in traffic the proposed change of use will introduce will cause a commensurate increase in risk. It is apparent that the redevelopment of the site provides an opportunity to move the egress further away from the bridge in order to improve the safety of the junction.

This view is reinforced by the document TD 42/95 Geometric Design of Major/Minor Priority Junctions, which shows that the visibility splay for a simple junction such as required here must be 70m where the speed limit on the major arm is 50kph, and 90m where it is 60kph. The document does give some discretion on the distance back along the minor arm that the display is measured from, but it gives no discretion at all on the length of the splay, so it is difficult to see how the retention of the existing egress can be justified in this case.

Summary

The foregoing clearly shows that the proposed development fails to conform to the following policies and guidelines:-

WBC Core Strategy Policy CP3:
a) - Are of an appropriate scale of activity, mass, layout, built form, height, materials and character to the area together with a high quality of design

f) - 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

WBC Design Guide Section 4:
R1 - Contribute positively towards the historic or underlying character and quality of the local area.

R2 - New housing should respond to its context

R7 - Building frontages must define the street space with a coherent building line that relates to existing building lines

R9 - The height of residential buildings should respond to a number of factors:
- the prevailing heights and degree of variation in height in the local context
- the scale and importance of the space that the building will define or enclose;
- its position in the street hierarchy
- the position of the building line in relation to the street (i.e. how far back the building is set from the street frontage); and
- whether it is a potential landmark location.

R10 - The assessment of an appropriate density must be design-led as well as considering the number of units per hectare, to ensure that development relates well to local character. This includes:
- the height, bulk and massing of buildings;
- the space around and gaps between them;
and
- the space required for parking

R11 - New housing should be designed to create street scenes with a coherent character, that relates well to, or enhances, existing street scenes (in terms of scale, rhythm, proportion, height, materials and colour)

R16 - New housing must provide easy access to some form of amenity space (flats) and minimum garden size (houses)

R18 - Dwellings must be designed to provide appropriate levels of daylight and sunlight to new and existing properties.

TD 42/95 Geometric Design of Major/Minor Priority Junctions

Precedence set by the decisions at Appeals APP/X0360/A/05/1188138 and APP/X0360/A/07/20533279

The overall impression of this scheme is that the overriding design requirement was to maximise the density achieved at the expensive of conforming to the Local Planning Authority's policies and guidance where necessary to achieve this. In some cases, this lack of conformance may be considered fairly minor, but the overall cumulative impact is such that the scheme cannot be regarded as conforming to the National Planning Policy Section 7 'Requiring Good Design' and therefore cannot be considered to be of a suitable quality to be acceptable in its present form.

Yours sincerely

Paul Gallagher
Chairman
Emmbrook Residents' Association