

I object to further development in and around Emmbrook as proposed in the Draft Local Plan Update, namely sites:

- 5WI009 Land on the Northwest side of Old Forest Road
- 5WK013 Land at Toutley Road
- 5WI010 Winnersh Farm Watmore Lane

Site appraisal criteria have not been applied consistently between sites, thus the appraisal is not sound. Whilst the SA 'tells the story' of the decision making, it makes little use of the appraisal against the SA objectives for these sites. Criteria have been applied inconsistently between sites. For example:

- SA para 5.93 relates to sites near the South of Wokingham SDL. It states, 'there is no strategic support for extension of this SDL'.
- SA para 5.94 also relates to sites near the South of Wokingham SDL. It states, 'there would be concerns in respect of reducing the gap between Wokingham and Finchampstead north, and concerns regarding traffic congestion in this area'.
- SA para 5.95 also relates to a site near the South of Wokingham SDL. It references traffic congestion, rural character and sense of separation that the site provides.

These same issues have not been considered in relation to sites near the North of Wokingham SDL. Why is there strategic support to extend here but not in the south? Traffic congestion, rural character and the gap function are of equivalent significance to Emmbrook. For example:

SA para 5.102, first bullet, relates to the Old Forest Road site.

- It states 'It is broadly supported to the extent that allocation can reasonably be held constant across the reasonable spatial strategy alternatives'. This sentence is very unclear, what does it mean? From the meaning that I infer, the same could be said of the sites adjacent to the South of Wokingham SDL site, which are rejected.
- It goes on to state 'it is noted that the site is within walking distance of Emmbrook Local centre, Emmbrook School (secondary) and an employment area' – similar could be said of the southern sites which would also have limited facilities within walking distance.
- It fails to consider traffic congestion, which is a significant issue.
- It fails to consider merger of Emmbrook with Winnersh resulting from the proposed allocation of the Old Forest Road site and the Winnersh Farm site.
- It fails to consider the rural character provided by the site.

SA para 5.80 relates to the Toutley Road depot site.

- Support is given to extension of this SDL, without justification.
- It fails to consider traffic congestion, which is a significant issue.
- It fails to consider the rural character provided by the site.

SA para 5.98 relates to the Winnersh Farm site.

- It fails to consider its close proximity to the North of Wokingham SDL.
- It acknowledges that 'achievement of good access to the strategic road network could prove challenging', yet the site is proposed for allocation.
- It fails to consider the rural character provided by the site.
- It fails to consider merger of Emmbook with Winnersh resulting from the proposed allocation of the Old Forest Road site and the Winnersh Farm site.

The cumulative impact of the proposed allocations in and around Emmbrook along with the ongoing extensive development has not been considered within the SA/SEA and within the proposed allocations. As such, the requirements of the SEA Regulations have not been met. The other developments which should be considered on a cumulative basis include the North of Wokingham SDL (760 dwellings at Matthews Green alone), the NDR distributor road, Weyside and the old Hewdens site.

The cumulative effects of these sites with other committed developments in an around Emmbrook include:

- Loss of rural character
- Traffic impact/unsustainable location
- Impact of, and impact on air quality
- Flood risk
- Loss of biodiversity
- Social cohesion

Loss of Rural character

The loss of the Matthews Green site and recent decimation of Old Forest Road for the bypass, along with other developments, has already resulted in a significant loss of rural character in Emmbrook. The Old Forest Road site would remove one of the last elements of the rural setting to Emmbrook, this is irreplaceable. Comparing a map of Emmbrook only a few years ago to the proposed future would highlight this issue.

Traffic impact/unsustainable location

Whilst the cumulative traffic impact of all these developments may be being assessed and addressed to some extent through the new roads, these sites are unsustainably located, with the majority of residents needing to use cars to access daily services and employment. The SA notes that the Old Forest Road site is sustainably located as it is close to the Toutley Road industrial area – in reality this is a small employment area offering few opportunities to local residents. Further, the SA states that the site is near a new local centre – in reality this is only three proposed commercial units. This is not a valid justification for allocation of these sites.

A further increase in traffic will impact congestion, noise and air quality in an area which is already congested, noisy and very close to the M4 AQMA. The new roads through Emmbrook aim to bypass the congestion and AQMA through Wokingham Town Centre – at cost to Emmbrook residents. The cumulative effect has not been considered within the site selection.

Air quality

The SA/site appraisal fails to consider the M4 AQMA – yet it considers other AQMAs in the borough. This is inconsistent and is not sound. The AQMA extends into the Winnersh Farm development and is in close proximity to the Old Forest Road and Toutley Road sites. The proposed Air Quality policy only requires further assessment of air quality within developments within AQMAs – not in proximity to them. Thus, this issue will not be considered further, putting residents at risk.

Flood risk

All three sites are within the flood zones 2 and 3a/b and are therefore the least preferable sites for allocation – other sites are shown to be preferable in the high level Sequential Test results. The consultation materials do not include detailed results from the Sequential Test (only a methodology is available); or demonstration that the flood risk has been taken into account in calculating the development capacity for sites/how flood risk will be addressed.

There is potential for off-site increased flood risk, particularly given the limited suitability for SuDS in Wokingham and cumulative impact of extensive development across the Emm Brook catchment. The cumulative impact does not appear to have been considered within the SFRA, despite this being required by the NPPF. The Emm Brook catchment extends across the North of Wokingham SDL, the South of Wokingham SDL and continues out of the borough. Given the extensive development in the catchment, this is a significant omission.

Residents frequently experience high ground water levels within Emmbrook, this has not been considered in any detail in the SFRA. Properties bordering the Old Forest Road site have historically flooded (from fluvial and other sources of flooding); it is well recognised that the flood risk of greenfield sites goes unrecorded. Approximately half the Winnersh Farm site is at flood risk. It is not apparent how this has been taken into account in the site selection process and how it has informed the capacity of the sites – the development density would appear to be uncharacteristically high for this area if this is taken into account.

Loss of biodiversity

The cumulative loss of biodiversity in Emmbrook has not been considered. It is not apparent how the existing developments have achieved a biodiversity net gain (required since 2012 NPPF), these further proposals will result in further habitat loss and fragmentation which has not been considered. Further loss of hedgerows associated with these proposed site allocations (which will be inevitable), will further impact the loss of rural character.

Social cohesion

The Emmbrook community is currently undergoing considerable expansion – the existing committed developments represent a proportionally large expansion of the community. No consideration is given to the need for this community to become established and 'bed in'.

The SA does not consider the effect of proposed allocations on a consistent basis – the Grazeley site is considered against more detailed criteria – many of the smaller sites are considered on the basis of GIS analysis only. This is inconsistent and is not sound.

Recent consultation - WBC recently spent a reported £60,000 to consult residents regarding the local housing need. Unsurprisingly, residents supported a lower housing need. How has this informed the calculation of local housing need? How has it informed site selection?

Site Capacity - The extent of development on proposed sites, and the calculation of their capacity is not apparent within the consultation materials. As such, residents are not able to understand the impact of the proposed developments. The consultation is therefore ineffective.

SA para 5.80 (Toutley Road depot) states a site capacity of 150 dwellings; the plan states 100 dwellings. Which is correct?

Site Ownership – it is understood that the Old Forest Road site is owned by Winnersh Fuel Allotment Trust, of which Cllr Prue Bray is a Trustee. Given the recent loss of allotments for the NDR surely this site would then be the ideal site to provide allotments to benefit the community? Or another community use? Cllr Bray should not be involved in the decision making for this site given the conflict of interest.