



The Wokingham Society
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Dear Sirs

Response to Consultation on Supplementary Planning Documents for North and South Wokingham, Infrastructure and Sustainability

The Society is grateful for the opportunity to comment on the Supplementary Planning Documents (SPDs) now under consultation and wishes to offer the following response:

1. Initial comments

- (a) We have liaised with various residents' associations and are thus aware of the submissions they have made. We endorse the points they make and would emphasise the importance of the Borough Council continuing to consult these associations, as representatives of the local community, throughout the whole of the planning period for these developments.
- (b) We fully understand that there is an onus on the Council to provide housing to meet the needs of those with inadequate or no accommodation on this economically and socially desirable part of the South-East, and we recognise that the Workshops, Exhibitions and the Examination in Public have all been directed towards identifying the best way of meeting this obligation.
- (c) In similar vein, we are happy to endorse the overall vision and objectives of the SPDs, and the great majority of the design principles; our concerns focus on the details attached to these aims, and on some of the consequences that flow from these details.

2. General issues

- (a) We have consistently urged that there should be specific public consultation on the future road and transport infrastructure for the Wokingham area. The level of uncertainty about requirements and delivery in the SPDs reinforces this need, and we say why we believe so in the specific comments we make below. **It is a source of considerable frustration that the promised publication of the latest traffic modelling, which includes data for pm and not just am road use, has been still further delayed and will not be available in sufficient time to allow any conclusions drawn from this modelling to be reflected in responses to these SPDs. We wish to record our opinion that the Council has been highly inefficient in this matter and has, from the time of the original consultation, let down the local community in its perfectly reasonable wish to see and discuss the plans for roads in their neighbourhood. As a result, our views are necessarily based on the earlier information about road and transport plans.**
- (b) It is not clear, beyond the formal requirement for the consortia's outline planning applications to be made available for public comment, what arrangements are intended for ongoing community participation. Will the consortia be required to follow the Council's Statement of Community Involvement and, if so, will the Council establish the form of such consultation, and indeed be a partner in whatever events are provided? It is our view that, since the future residents of the four

SPDs cannot speak for themselves, the Council should establish a forum which will include current local residents to discuss how best to provide the proposed housing and infrastructure in and around these developments. The SPDs for the SDLs propose a Delivery Board for each SDL and these might be a suitable vehicle for the forums we propose.

- (c) There is no indication of how the SANGs and open green spaces within the SDLs will be managed after completion of the developments, nor is there any statement assuring their preservation from future building. These are highly significant issues and we would ask that they be addressed at an early stage so that both existing and future residents can be reassured that the landscape within the SDLs will not be subject to further development.
- (d) The frequent reference to 'high quality' is meaningless and redundant. What other quality would one seek?
- (e) We will not comment separately about the Infrastructure Delivery and Contributions SPD, but will refer to it as appropriate within our responses to the North and South Wokingham SDLs.

3. North Wokingham Strategic Development Location SPD

(a) Section 1: Introduction

This Section, which is not contested, is largely common to all four SDPs for the targeted development locations and summarises the processes that arrived at these proposed solutions.

(b) Section 2: Site Context

This Section reasonably sets out the objectives for development of this location, including constraints and opportunities and the issues arising from public consultation, and is accepted in this light. Detailed comments arise from the measures proposed for achieving these objectives.

(c) Section 3: Development Concept

The three objectives at 3.1.1 to 3.1.3 are fine, but the reference to 'two key components' in 3.1.4 – the 'primary access route' out to Coppid Beech roundabout, and 'the provision for an Ashridge interchange' on to the A329M do not go as far as to guarantee their delivery, if indeed they are desirable as formulated.

3.1.10 about pedestrian and cycle accessibility relates back to 2.3.4, which posits 'direct' connections to Coppid Beech roundabout, the town centre and other public transport interchanges. Given any likely estate layout, it does not seem credible that such access will be 'direct', and for many will surely be circuitous round residential streets, especially existing ones. While those on foot and bike would like to have straight-line routes to these facilities, can this really be achievable?

(d) Section 4: Key design principles

The design principles and the proposed means of implementing them are welcomed, and it is vital that the consortium be held to account to deliver them. What are less applaudable are the ubiquitous photographs of solutions elsewhere, frequently from large conurbations. It has been stressed at previous meetings that these sites are treasured local habitats and thus should have landscaping and other facets which arise uniquely from the environment itself. In response to an earlier consultation, we were told that these images would be reviewed and further text added in explanation if appropriate. Nothing has changed.

As concerns public art, local interest and expertise should be consulted and a panel established to allow such representation.

This precept needs to apply generally to all aspects of future landscape management, referred to at 1f(i). It is absolutely vital that the conservation of all green open spaces is assured through town green or other mandatory designations, to avoid future building incursion, and that the SANGs and other green areas are managed through a board that includes residents both on and off the development. Indeed, this board should be created before as part of the planning process so that the spaces are carefully planned with the local community in mind.

(e) Design of Employment Areas

This Section assumes an adequate market for business occupancy. While 5c(iii) requires that buildings be adaptable to changing employment needs, it should be extended to necessitate review of redundant buildings or sites to ensure that alternative uses are introduced should the business model fail, to avoid the area becoming run down, as is the case for much of Molly Millars Lane.

(f) Access & Movement Framework

The road and transport proposals in this Section are disappointingly tenuous.

Table 3 of the Infrastructure SDP and Section 6(a)(iii) refers to the new road as a 'relief road', as does Section 6.4.2 of this SDP, where the element within the North Wokingham SDP and the Ashridge interchange are described as 'necessary', to the intended extension connecting to the major road system. The table following 6a (ii) calls it a 'distributor' road. Given the number of streets feeding off this route, its use for buses, and the expectations of the developers of Phase 1 that it will have a 20 mph restriction, there is no prospect of it providing relief to existing roads in the vicinity. The nomenclature should be standardised to refer to a 'distributor road'.

The western end of the distributor road will run into Toutley Road and thence to the A329 Reading along Emmbrook Road, which has single-lane working under the railway bridge. This throat would cause a significant bottle-neck were traffic to seek to use it as a relief road, or as a means of travelling west.

The eastern end to the vicinity of Coppid Beech roundabout, it says in 6a(iii) 'will be delivered through any subsequent phases of development after 2026'. This is taken to mean that it will not be built if there is no future housing development to the east of the current SDL.

This position is totally unsatisfactory, since it means that the occupants of the SDL will exit onto existing roads, thus adding to what is acknowledged as a congestion area. It also makes it impossible to deliver the Core Strategy requirement of 'good access to public transport and the Coppid Beech Park & Ride'.

The need for the Park & Ride is nowhere spelled out. If it is solely for access to Reading, it offers little to Wokingham residents; if it is intended to provide buses into central Wokingham, there is little likelihood of it being used by either Bracknell or Wokingham people, and buses will thus clog the centre of Wokingham for no reason. A clear strategy, with strong evidence of demand, is needed.

There is a similar lack of clarity about the purpose of the Ashridge Interchange, in design principle 6d, which again threatens to swamp local roads with no relief road to carry traffic away.

Finally, there is no total costing of road provision outside the SDL, with a transport initiative fund bid unallocated, and uncalculated compulsory acquisition costs which would run into millions of pounds sterling.

These are some of the issues which we propose should be covered in the meeting/workshop on road infrastructure.

6.5.4 covers *Community Infrastructure*, but fails to refer to public involvement in determining what is needed, eg in the community centre. This is clearly necessary, and should be written in as a required part of the agreement. Further, the management company running the Neighbourhood Centre should have residents' and community volunteer representation as of right.

6.5.5 proposes a Delivery Board, but again excludes local representation. This is equally important and should be included as a requirement.

4. South Wokingham Strategic Development SPD

(a) Section 1: Introduction

As above this Section, which is not contested, is largely common to all four SDPs for the targeted development locations and summarises the processes that arrived at these proposed solutions.

(b) Section 2: Site Context

As before, this Section reasonably sets out the objectives for development of this location, including constraints and opportunities and the issues arising from public consultation. There are, however, two points of detail requiring comment:

2.2.1 refers to 'the need to improve and enlarge the railway bridge at the western edge' whereas the Infrastructure SPD makes it clear that this bridge is to be replaced and not just modified.

2.3.4 includes an aim of the southern 'relief' road to reduce pressure on the town centre (clearly referring to traffic). The speeds that will be encountered – through a 'public street' bordered by premises and with numerous roads feeding off it, and perhaps a 20 mph limit for safety – will deter drivers from using it in preference to a more direct route through the town, and thus have little if any relief value. For this reason it was understood that the Council had subsequently preferred the expression 'distributor road', yet this SPD and the Infrastructure SPD indifferently use both words, ie:

'Relief road' or 'SRR': South Wokingham SPD: Section 2.3.2, Section 2.4.9, table following Design Principle 3(a), Design Principle 3(e)(i); Infrastructure SPD : Transport Infrastructure table

'Distributor road' or 'SDR': South Wokingham SPD: Section 2.3.3, Sections 2.4.6 and 7, Section 3.1.2, Design Principle 2(a)(ii), Design Principle 3(c)(ii), section 5 Access and movement framework, table following Design Principle 5(a)(ii) and (iv); Section 6.4.2; Section 6.5.5.

What is proposed is primarily a distribution function and thus should be solely described using this term. The confusion of using both expressions should be removed.

(c) Section 3: Development Concept

The vision and overall development concept are endorsed, but we would emphasise the requirement in 3.1.2 of 'maintaining key views both in and out, between the development and the open countryside'. We fully concur with this aim, but do not consider that it has been applied in respect of the proposed housing to the west of the Gipsy Lane- Ludgrove footpath, where the most significant outlook over open country would be obliterated. We return to this point later.

Section 3.2.1(v) stresses the urban character and development frontage of the distributor road. This concept has never been properly explored in public. Why are these two facets desirable in a road that seeks to allow easy access to side roads and passage through the development? Figure 3.1 shows the distributor road carving through the centre of the SDL, dividing communities from each other and spoiling landscapes that will become piecemeal if this route is implemented. Surely a better solution would be to move the road to the western edge of the Buckhurst Farm development and the northern edge of the southern part of the SDL, with no housing on one flank and a limited number of streets running from it, leading to smaller streets within the proposed hierarchy. This would allow faster passage through the SDL, while buses could run to the neighbourhood centres and to more central street locations if desired.

The above solution can be seen to work in Lower Early through to the M4 junction and in Bader Way around Woodley. The alternative, of an urban street passing a neighbourhood centre, with resultant slow traffic and major speed restrictions, can be seen in Woodley centre and clearly demonstrates that this is not a good choice for a through road.

(d) Section 4: Key Design Principles

As in the SPD for the Northern SDL, inappropriate photographs from largely urban developments elsewhere in the country do not properly reflect the need for local, sensitive solutions to landscape and building design issues. The reader may suspect that their inclusion owes more to the authors wanting to display their knowledge than to a real desire to offer implementable suggestions. In our view they should be withdrawn from the SPDs. The response to the previous consultation said this aspect would be reviewed but nothing has changed.

1b(ii) seems to be guilty of a contradiction, in that it sees the need to mitigate built development (ie lessen the impact of it) in a manner which 'enriches and enhances the overall habitat'. You really cannot build on land and thereby improve it as a natural habitat. We would of course like it to happen, since we have enjoyed this part of the countryside for many years, but we regard it as totally unfeasible, and an indication that insufficient thought has been given to the real issue of protecting the local environment. It can of course be an achievable aim in the SANGs and green open spaces, but that has nothing to do with the built areas.

We assume it is taken for granted that the provision of play and sports facilities - principles 1c(v) and 1d(iii) - will be determined in consultation with potential users, and not just the Council. This should be stated for clarity.

As for the North Wokingham SDL, the choice of public art, proposed at 1e(iv), should involve early consultation with local community groups with an interest in and knowledge of this aspect. We welcome the proposal at 3f(ii) that provision should be made to involve local artists.

Again, in line with the proposal for North Wokingham SDL, the requirement at 1f(i) for management of the SANGs and other landscape elements needs to include local representation on whatever decision-making structure is chosen. As part of this process, we would reiterate the need for the long-term protection of these open spaces to be guaranteed by assignment as town parks or other conservation status.

Design principle 2a says that ‘a smaller pocket of development can be accommodated in the west of the site, close to Chapel Green Farm’. This is in flat contradiction to requirement 3.1.2 of ‘maintaining key views both in and out, between the development and the open countryside’. The adjacent footpath furnishes the only panoramic view over an open and descending landscape in the whole site and it would be disastrous for this highly attractive setting to be lost to housing. In its response to concerns expressed in the previous consultation, the Council said that it would ‘add text to all SDLs regarding benefit of incorporation of views of landmarks, distant views, etc’. This text cannot be found and should be inserted as a minimum. The Council also said that it would ‘refer request for Conservation Area status [for this land] to Conservation Team for consideration’. There is no evidence this has been done.

Furthermore, the area west of the footpath involved is subject to frequent flooding from its high water table and water feeds from below the surface of the land. There is really no necessity or logic at all to build on this part of SDL and the homes involved should be distributed elsewhere on the site.

The idea of self-build plots, at 2b(iv), has much to commend it.

Design principle 3g(i) urges the developer to discuss street and area names with the Borough and Parish Councils. This ought to be extended to include local heritage and community organisations that are perhaps best placed to advise on these matters.

The provision of community space envisaged in 4a(ii) and (iii) needs similarly to involve consultation with community groups with an interest in this aspect.

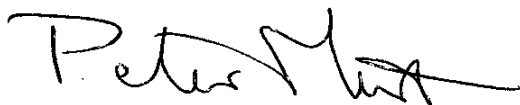
The routing of the southern distributor road has been discussed under Section 3.2.1(v) above. We would again stress the inappropriateness of the current line, through the centre of the SDL and urge that it be relocated at the northern edge of the south area and on the west side of Buckhurst Farm.

(d) Section 6: Delivery

Section 6.4.4 says that ‘the following outlines the sequence of development...’ but then omits the detailed phases included in the original draft, rendering this paragraph meaningless. Perhaps it was intended to rely solely on the iteration in the Infrastructure SPD.

Sections 6.5.1 and 6.5.5 cover long-term management and management of delivery. As already argued, these should involve local residents, and should include representation on both the short- and long-term bodies.

Yours faithfully

A handwritten signature in black ink that reads "Peter Must". The signature is written in a cursive, slightly slanted style.

Peter Must
Chairman