

WOKINGHAM TOWN COUNCIL

RESPONSE TO THE CONSULTATION ON THE DRAFT SOUTH WOKINGHAM SDL SPD

Subject	Reference	WTC Comment
Overall impact of SDLs	N/A	<p>Wokingham Town Council broadly agrees with WBC development strategy, where projected housing numbers are no greater than the average of the past 20 years; it notes that control of development will enable developers' contributions to fund infrastructure to a substantially greater degree than has been achieved previously. However, it has concerns on the actual infrastructure proposed, its phasing, and a number of points as contained in the following text.</p> <p>We are concerned that by considering each SDL separately, we miss the overall impact that these developments will have in totality, never mind the additional impact of Wokingham town centre redevelopment & Bracknell Forest's Jennetts Park and other developments. Of particular concern is the combined traffic impact on London Road, the Coppid Beech, roundabout, Finchampstead Road and the "school run" to St Crispin's School.</p> <p>In addition, with the developments in both North Wokingham and South Wokingham, Wokingham is in danger of merging with Bracknell, with the possibility of its having no SANG on its western flank, and other nearby towns and losing its distinctive character. The rigid enforcement of our SANGs and their width will, therefore, be critical.</p>
Planning Policy Framework	Section 2.3.3	<p>It is difficult to envisage how the existing Rances Lane shops could be upgraded to a Local Centre for retail purposes of anything like the size and variety needed to support the South Wokingham development. Also, it seems difficult to equate this concept with one of the main features of the proposed town centre regeneration, which is the inclusion of a substantial supermarket, ostensibly to cater for the increased retail demand that the greatest proportion of the 13,000+ proposed houses will generate. (It is acknowledged that the new, smaller supermarket proposed for Arborfield will take some share of demand.)</p>
Constraints and opportunities	Section 2.2 (page 9)	<p>Three of the main access concerns stated are:</p> <ul style="list-style-type: none"> ◆ the inability of existing level crossings at Waterloo Road and Easthampstead Road to cope with traffic numbers, and also the Network Rail long-term objective to close the level crossings,

		<ul style="list-style-type: none"> ◆ the possible impact and practicality of a junction onto London Road in the light of existing traffic flows and residential neighbourhoods to the north of London Road; and ◆ the need to improve and enlarge the railway bridge to access Finchampstead Road <p>All of these constraints highlight the need for the Southern Relief Road referred to in the Adopted Core Strategy (page 119) to be integrated into a comprehensive transport infrastructure plan for Wokingham Town as a whole, and for the provision of that transport infrastructure to be independent of developer S106 contributions and development phasing.</p>
Statutory Consultation - Viability and phasing of Infrastructure	Section 2.4.9 (page 17)	With considerable concern having been expressed that the developments would proceed without the infrastructure requirements of Appendix 7 of the Adopted Core Strategy being met or being only partially met, the statement that “Detailed consideration of viability has taken place using external consultants and the SDLs are deliverable” completely fails to address these specific concerns about infrastructure delivery.
Statutory Consultation - Transport issues Traffic modelling	Section 2.4.9 (page 19)	<p>It is clear that the paragraph on Transport Issues in the DRAFT NORTH WOKINGHAM SDL SPD has simply been repeated verbatim in this document.</p> <p>It is immensely frustrating that the latest traffic modelling has been further delayed and will not be available in sufficient time to allow any conclusions drawn from this modelling to be reflected in response to this SDL. Our views are therefore necessarily based on the earlier information about road and transport plans.</p> <p>Also, without details of the sizes and locations of the two proposed primary schools, we do not know what effect they will have on traffic modelling and any bottlenecks they could cause. It should be noted that illustrative preferred spatial framework plan (figure 3.1 on page 25) only shows the approximate location of one school; the other is not shown.</p>
Statutory Consultation – Other Matters Impact of school plans	Section 2.4.9 (page 19)	<p>It is unclear whether the traffic modelling includes the impact of future school re-organisations.</p> <p>There is no firm statement on the possible closure of the Emmbrook School. Timing of the increase from 1000 to 1500 at St Crispin’s is unclear and “early in the development” could imply during the period 2012-15. There will be a review of catchment areas (not referred to in the SPD) but how will numbers look, before and after proposed changes?</p> <p>If Emmbrook School were to close, with St Crispin’s then being the main school for Emmbrook children, the peak traffic from Emmbrook & the North Wokingham development school runs would have a further detrimental impact on Keephatch Road, Binfield Road and the junction with</p>

		<p>London Road, aggravating the existing problems with London Road.</p> <p>This will be further impacted by St Crispin's school also being the school to serve the new South Wokingham development.</p>
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Development components for the Masterplan	Section 3.2 (page 23)	<p>The development components listed make no mention of a medical centre, which one would have considered an essential feature of facilities for the residents of South Wokingham within this SDL, as well as the other SDLs.</p> <p>It is noted that one of the development components is the concept that the proposed new southern distributor road “shouldact as a key public transport corridor”.</p>
Management of SANG	Section 4 (pages 30-31)	<p>There is no indication of how the SANGs and open green spaces within the SDLs will be planned before and managed after completion of the developments. 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.</p> <p>In particular, the role of the SANG location in the South Wokingham development in ensuring the clear separation in perpetuity between Wokingham and Bracknell/Crowthorne is critical.</p>
Design Principle 2b:	Section 4 (page 40)	<p>It is re-assuring to note the requirement for all housing to be “tenure blind”, so as not to distinguish between private ownership, social rented and shared ownership properties in the appearance and setting of the dwelling. However, the methods by which this can be achieved within the character of development set out in the SDL design principles and the Adopted Core Strategy are very limited. More detail is required as to how the proposed 35% affordable housing content will be integrated within the development, both in spatial location and design quality.</p> <p>It is also pleasing to note that some provision should be made within at least one neighbourhood for self-build plots, to enable individuals to design and construct their own dwellings. Re-assurances will be required in the granting of planning permissions for such dwellings that they are in keeping with the overall character of the area, development and neighbourhood, and that they comply with the Borough’s Residential Design Guide.</p>
Access & Movement framework	Section 4 (pages 59-61)	<p>The purposes of the Southern Distributor Road (SDR), namely “To carry vehicles travelling through the development, to connect neighbourhoods and to give access and exposure to the centres” are fundamentally flawed.</p> <p>The SDR should NOT go through the Southern development, but should be a relief or ring road from the Coppid Beech roundabout to the Finchampstead Road, with limited access to it from roads on the development. This would give access for site traffic and cut down on the traffic on</p>

	<p>London Road, which is already under pressure and, at peak times, over capacity and would allow HGVs to avoid the town centre to a greater degree, without passing along inappropriate roads in the new development.</p> <p>There will still be a need for Buckhurst Boulevard for local traffic and access to the centre of Wokingham.</p> <p>Footpath and cycle access to St Crispin's School should be considered, such that shorter travel distances mitigate the need for "school runs" by car.</p> <p>Of great concern is the phasing of the delivery of the SDR, which WTC feels should be completed before any housing is allowed, otherwise it will be partially done, with construction vehicle movements impacting the new residents in the SDL and with no definitive completion or finance. The current plan for Buckhurst Farm shows vehicle access/egress to London Road which will have an adverse effect on the flow both into and out of the town.</p> <p>One of the key issues arising from the options exhibition in September/October 2009 was support for the delivery of necessary infrastructure, including the (SDR), at an early stage (see Section 2.4.7). Similarly, one of the headline issues of the statutory consultation which took place between 9th February and 23rd March 2010 was considerable concern that the developments would proceed without the infrastructure requirements of Appendix 7 of the Adopted Core Strategy being met or being only partially met (see Section 2.4.9).</p> <p>The Adopted Core Strategy, the Infrastructure Delivery SPD and the SDL SPD indicate that the construction of the SDR will be developer funded, most probably via S106 agreements (given that WBC do not anticipate finalising a Community Infrastructure Levy (CIL) charging schedule until April 2014), as will the replacement of the southern railway bridge and some of the costs of the northern rail bridge improvements.</p> <p>However, whilst the phasing of the housing construction, is quoted as starting in 2011, the southern bridge construction phasing is from 2012 to 2014 and the northern bridge improvements are "likely from 2016 onwards". Clearly therefore, the completion of the SDR will not be achieved until at least six years after commencement of the residential units.</p> <p>Wokingham Town Council supports the principle of the North and South Wokingham SDLs, but</p>
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		<p>believes that it is essential to have an adequately thought out and overarching plan to prevent congestion in the Town, not just until 2026, but for a further 15 years beyond. With a further forecast 1.35 cars per household in this area, it is essential that the Highways infrastructure is planned by WBC and the projected road layouts concreted into the SDLs and not left to the developers to negotiate or indeed to finance totally.</p> <p>This needs forward vision which can only be provided by WBC. Wokingham Town Council wants to see effective relief roads around the perimeter of these developments so as not to force traffic into the town but to give an opportunity for traffic from the new developments to bypass the town and the new settlements. There is no commitment to these roads.</p>
	Section 4 (page 60)	WTC considers the proposal to downgrade the Waterloo Crossing to cycle, pedestrian and public transport only routes to be a retrograde move, which will only serve to increase congestion on other parts of the road network, especially during the schools runs.
Sustainable travel choices	Section 4 (page 61)	The SPD makes no mention of the Inspector's statement that "The proposals include a new Southern Distributor Road (SDR), which would be used for a new subsidised bus route with services every 15 minutes".
Sustainability	Section 5 (page 64)	The SPD makes no mention of utilising the energy saving and carbon-reduction benefits of the use of thermal mass in the construction of the development. Thermal mass is a concept in building design which describes how the use in building construction of materials with high specific heat capacity, high density and moderate/low thermal conductivity provides "inertia" against temperature fluctuations. When used well and combined with passive solar design, thermal mass can play an important role in major reductions in energy use in active heating and cooling systems.
Flooding	Section 5.2.4 (page 67)	<p>There seem to be "standard" statements on flood protection, but what is the process for deciding what is required in both North and South Wokingham developments? The only obligation on developers is to "ensure volumes and peak flow rates of surface water leaving the SDL are no greater than the rates prior to the proposed development".</p> <p>WBC is urged to think again about what provision will be made for flood protection, outside the scope of developer contributions, given the problems caused by peak flow rates in July 2007.</p>
Construction and relief road infrastructure	Section 6.3.2 (page 72)	The phased completion of the Southern Distribution Road in line with the phased delivery of housing presents a major problem. At the Finchampstead Road end, given the volumes of traffic and delays already present, there would seem to be significant risk of traffic not using the

		<p>SDR, thus aggravating town centre congestion.</p> <p>The adopted Infrastructure Delivery SPD states (P57) that “The delivery of this road is subject to the provision of the replacement of the Southern railway bridge on Finchampstead Road and contributions to the northern rail bridge improvements” and that “Phasing is likely to be between 2011 and 2017”</p> <p>The phasing of any alternative arrangements to carry traffic from the new development away from the above existing residential roads must be clearly planned ahead of any planning applications.</p> <p>These arrangements should then be built as appropriate to mitigate the traffic generated by each phase (rather than leaving the relief road infrastructure until the end of the final phase in 2026).</p>
Community Infrastructure	Section 6.5.4 (page 73)	<p>Section 6.5.4 covers <i>Community Infrastructure</i>, but fails to refer to public involvement in determining what is needed, e.g. a community centre and medical centre. The protocols for involvement in the planning and subsequent running of the Neighbourhood Centre should be determined up front.</p> <p>The timing of this infrastructure should be phased earlier in the developments to benefit the first residents moving in (rather than being left until the end of the development).</p>