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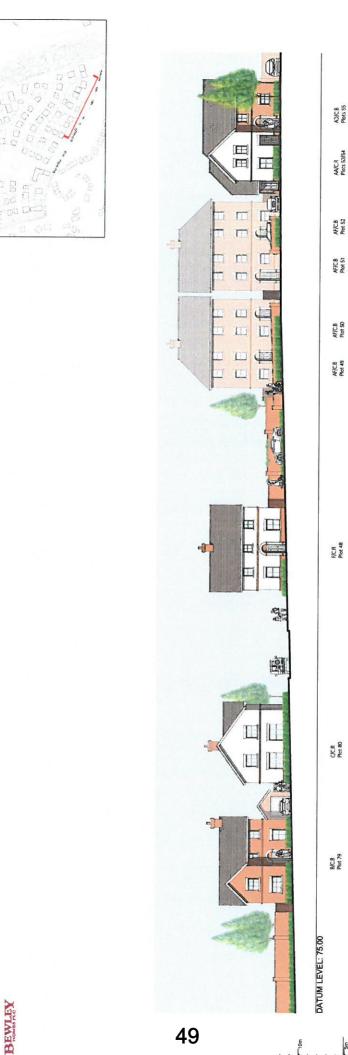
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old wokingham road, crowthorne

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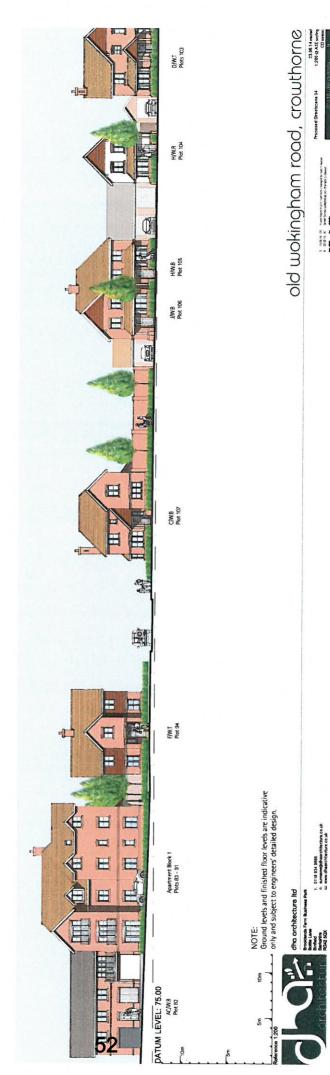
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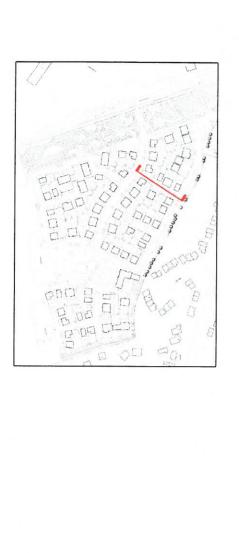


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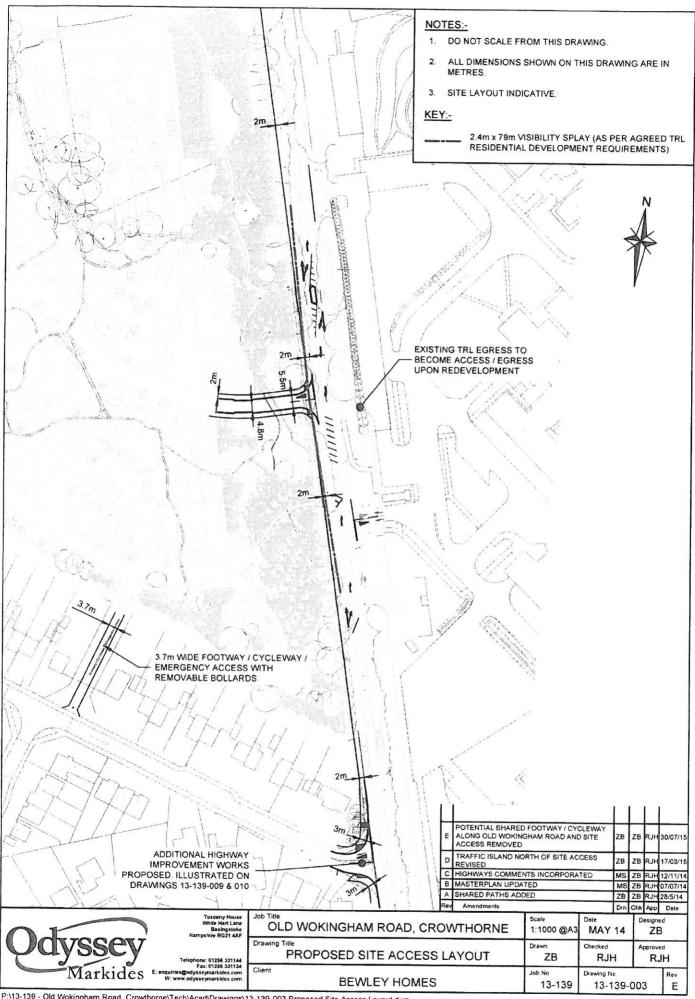




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Response to the Planning Application for the land adjacent to Old Wokingham Road ref F/2014/1561

Our concerns so far identified are discussed below under the following headings:

- 1. Procedural concerns
- 2. This development makes no sense for Wokingham
- 3. Review of objections previously submitted in the light of new information
- 4. Additional objections based on the amendments to the application

1. Procedural concerns:

- a. The volume and scope of amendments and revisions are too large to be considered as a "minor" amendment and should now be resubmitted as a "new" application
- b. Only when we repeatedly questioned the lack of supporting detail behind the revised plans released early in May did it become clear that the "revised" plans were in fact incorrect and that a new set of amended (or revised) documents had been submitted for consideration. This was confirmed on Friday 21st May, leaving one working day for comments to be provided before the consultation end date (26th May)
- c. The known limitations of the WBC Planning Portal present further obstacles in comprehending the nature of the amendments to such a major development.

WWPC has put together a response but due to the limited time available, the volume of amendments, and the shortcomings of the document portal we fear that we may have missed some positions by relying on so-called "final" documents which have themselves subsequently been updated. You will also understand that we would wish to present a response that is more useful to the Planning Office and Planning Committee and which reflects a broad consensus.

1.1. Procedural Concerns

Application F2014/1561 was first submitted in July 2014 and was the subject of a large number of objections, including from Wokingham Without Parish Council. The developers made (March 2015) substantive amendments to the plans that make the overall application substantially different from the first. These changes have now been mostly reversed, although there are a number of areas where we cannot positively ascertain whether the most current position is as at July 2014 or March 2015.

The volume and complexity of the changes is further complicated by the known limitations of the WBC Planning Portal (these shortcomings are already recognised by WBC hence the decision for an improved system). By listing all the new features as revisions and in some cases addenda to the revisions, the application is extremely confusing and difficult to navigate. We note that the original documents are all organised neatly into different folders (Architecture, Drainage, Environment etc.) then after that there are "Revised & Additional Details" (all jumbled) then "Revised and Additional Details Further Amendments" (all jumbled) and the "Revised and Additional Details"

Amended". With each section containing documents with "final" in the name it is impossible to determine which versions are those to be assessed.

We are grateful for the provision of the amendments package and drawing register. However, these were only provided onto the portal on Friday 21st May, and with a consultation end period of Tuesday May 26th over a bank holiday weekend, this is simply insufficient time to consider these documents fully.

Recommendations:

a. The application needs to be resubmitted as a completely new application, to include sufficient time for a considered study of the updated positions to be taken, so that well-informed and constructive comments can be provided to the Planning Office and Planning Committee.

2. IT'S A BAD DEAL FOR WOKINGHAM and for Wokingham Without

2.1. An unnecessary development

Refusal of planning permission for dwellings on this land would not be contrary to the housing provision required by Wokingham Borough Council in the period to 2026. Amending the Wokingham Borough core strategy to include this area as a strategic gap (Between Wokingham and Crowthorne / Bracknell) will not invalidate the entire plan as it would be a single amendment. Such an amendment would be allowable, and would not affect the overall plan, because:

- a. The site affected is the only major site in the plan without planning permission or a resolution to grant planning permission.
- b. Only one policy in the plan is being altered, which has no impact on any other policy.
- c. The loss of the housing provision at this site would have a minimal impact on the numbers within the overall plan.
- d. The loss of 116 homes at this site would not affect the delivery of WBC's housing allocation, as WBC has successfully demonstrated to the Planning Inspector in the successful Pineridge Appeal (Wokingham Borough Strategic Housing Land Availability Assessment October 2014). Since the date, WBC has consistently approved numbers of dwellings in excess of that specified in the plan for allocated site (notably the additional 300 homes at Keephatch Beech O/2014/2435)
- e. The reason for the amendment is a change in circumstances since the Core Plan was drawn up in that a greater number of dwellings than envisaged at that time have been approved on a neighbouring site by a neighbouring planning authority.
- f. Removal of this housing site would not affect the plan overall (the key criterion in PI guidance).
- g. The 'normality' of not using this for housing policies is because changing one will affect the overall plan in terms of numbers, often leaving it with insufficient provision. This does not apply to this site.

Recommendation: this important green field site, providing the necessary green gap between Wokingham and Crowthorne/Bracknell needs to be returned to the Reserve site allocation, until all other more suitable sites have been exhausted (for example the brown field TRL site adjacent to this site).

2.2. Incoherent logic for Wokingham

- a. **No Infrastructure "in kind"** The proposed United Charities Development doesn't deliver any "infrastructure" for the wider community (all infrastructure improvements are reliant on the TRL development).
- b. No cash for Infrastructure The majority of S106/CIL money will be claimed by Bracknell Forest / TRL developers for TRL infrastructure "improvements"
- c. No need for the housing Wokingham doesn't need the extra 116 houses the Pineridge Planning Inspector confirmed in Oct 2014 that the Wokingham Borough Strategic Housing Land Availability Assessment contained sufficient deliverable housing sites with existing <u>planning permission</u>. (i.e. excluding the Woodlands site). Since this date 300 additional houses have been granted planning permission at Keep Hatch Beech (this is an increase of 20% for the North Wokingham SDL)
- d. Arguments advanced by WBC in the successful Pineridge appeal apply to this development too - This site is remarkably similar in landscape setting and design to the Pineridge site, so the Planning Inspector's support of WBC arguments (around landscape character, visual amenity, protection of the Green route) must logically apply to the United Charities' Development.

Recommendation: the destruction of this important green field site in return for no tangible (or intangible) infrastructure benefit to the community cannot be justified, and the Pineridge appeal decision provides confidence to WBC that an inspector will uphold this decision.

2.3. Development provides excessive strain on the essential greenspace between Bracknell, Crowthorne and Wokingham

- a. The majority of the South Wokingham Strategic Development Location (SDL) lies within Wokingham Without Parish, an addition of 1900 houses. This equates to 14% of the WBC planned houses (13,500) whilst the Parish accounts for just 5% of the WBC population.
- b. These numbers exclude the 1,000 (min) houses on TRL site in Bracknell "across the road", with NO opportunity for residents to influence (a point we shall expand later.)
- c. These woodlands need to remain largely as a strategic green gap between the encroaching developments at Wokingham, Crowthorne and Bracknell. Nine Mile Ride is fully recognised as an important Green route / wildlife corridor linking up the internationally important Blackwater Valley and Thames Basins Heath via (national) Heath Lake SSSI and Gorrick Woods (SPA regional). Whilst it is suggested that the SANG will continue to provide this, in fact the SANG has a different function namely to reduce recreational pressure on the SPA. If the SANG is to perform both roles it would need to be larger than is currently planned.
- d. By custom and use, the woodlands are publicly accessible as demonstrated by the well used paths throughout the site. This application therefore reduces the amount of publicly accessible green space by over 2 hectares. The Wokingham Biodiversity Plan looks to increase the amount of publicly accessible greenspace as currently the Borough is below Natural England guidelines (in terms of hectares / population). We

find it illogical that Wokingham want to contravene its own policy (by further reducing the amount of green space) when the site is not required for housing supply.

Recommendation: this important green field site, providing the necessary green gap between Wokingham and Crowthorne/Bracknell needs to be returned to the Reserve site allocation, until all other more suitable sites have been exhausted (for example the brown field TRL site adjacent to this site).

- 2.4. Residents struggle to understand how with the existing lack of infrastructure in Wokingham Without the area can withstand the pressure of new housing.
 - a. Due to Bracknell Forest "policy", there is no opportunity for the WW community to influence the TRL development through cross-community liaison and debate. (NB not for want of trying by this Parish Council, Cllr Ross/Hellier-Symons, Cllr Kaiser and others).
 - b. Schools. The lack of WW infrastructure means dependence on others e.g. Bracknell Forest for Edgbarrow. Of serious concern to the residents is that BFC are seriously considering consulting on changing the designated area particularly the non-BFC parts (i.e. Wokingham Without). The implications of this change are obviously not yet available, but given that the possible options include Easthampstead Park, Arborfield or St Crispin's, none of which are as close as Edgbarrow is deeply concerning to residents.
 - c. Roads. The South Wokingham Distributor Road "design point" is to minimise impact on Wokingham Town Centre, which by definition (and admission of WBC Highways Officers) will lead to increased volumes of traffic south i.e. on Wokingham Without roads already at or close to peak capacity, such as Old Wokingham Road, Easthampstead Road and Nine Mile Ride.
- 3. Revision to the Objections WWPC submitted September 2014 Wokingham Without Parish Council submitted detailed objections on the original application (dated July) in September 2014 with further observations provided in December 2014. Insofar as we have been able in the limited time given us we have reviewed our previous input against the revised and amended application and believe that all of our original eleven objections still stand recognising that one item relating to surface water flooding has been partially addressed in the revised application.

In reviewing the revised application, the "minor amendments to layout, parking, roads and SANG/green space configuration" have led to a series of further objections which we raise below.

The recent Pineridge Appeal Decision supporting strong arguments put forward by WBC to a similar site less than one mile away has re-enforced the validity of some of our original objections with high probability that Planning Inspector will give high regard to these objections.

3.1. Overdevelopment when considered with the cumulative impact of other developments, particularly in terms of infrastructure provision.

The developer for the TRL site immediately adjacent to this site, now has signed the agreement to build 1,000 houses, a number of community facilities (including a primary school) and deliver some road traffic enhancements. This "outline planning" agreement was signed WITHOUT including any impact of the Unities Charities development, however the Unities Charities development can only proceed soundly based on the proposals for the enhancement of the local infrastructure resulting from the Legal & general TRL development.

There has been no evidence produced that would indicate adequate work has been done by BFC to see whether the TRL site has the capacity to mitigate the impacts of an additional 116 dwellings within Wokingham Borough.

Further, the timing of the delivery of the TRL infrastructure roll-out is not aligned with the timetable for the United Charities Development and it can be predicted that nearly all of the proposed dwellings on the Charities Land would be occupied well before shops, schools, cycle and footpaths and a permanent community centre are available on the TRL site.

BFC's approved Site Allocation Plan (SALP) sets out that the phasing for TRL which would be between 2015 and 2022. To support the examination of the original SADPD, there was an agreed Statement of Common Ground between BFC and WBC in relation to community and education infrastructure, in light of comments WBC raised on the SADPD Draft Submission consultation. This contains details of phasing of the infrastructure relating to TRL but this consideration was before this present application was identified.

Thus the projection for the TRL development are a temporary community facility by 50th dwelling projected to be 2015/16 or later and permanent by 500th dwelling, and primary school to be open within 2 years of commencement of development **projected to be** 2017/18 or later. In which case the United Charities houses promised before 2015/16 are likely to be occupied and the United Charities development will impose an unacceptable level of pressure on existing infrastructure and services in the area. Lack of capacity in the existing infrastructure in the vicinity of this site is a sensitive issue and has been raised by many residents through the SADPD processes. (See comments by BFC in the Proposed Submission Managing Development Delivery Development Plan Document dated 22 August 2012).

Recommendation: Undertake a full determination of the United Charities Development involving a full examination of the details of the infrastructure to be provided in the TRL plans. However, these are not currently available (they will be brought forward as reserved matters in the detailed planning application as the development rolls out). Accordingly the present application should be deferred until this analysis can be properly undertaken.

3.2. Risk to Local Landscape Character

We note the recent successful Pineridge appeal upholding the refusal of planning permission for unauthorised housing in a similar woodland site approximately 1 mile further West on Nine Mile Ride. We particularly note the inspector's comment on "Detrimental impact on an important landscape feature, failed to protect the Green Route (Nine Mile Ride) and has not retained landscape character." It is impossible to see how the inspector's comments do not apply equally to this site.

(See Sections 87-90 of the Pineridge Decision)

3.3. Loss of Visual Amenity

We note the recent successful Pineridge appeal upholding the refusal of planning permission for unauthorised housing in a similar woodland site approximately 1 mile further West on Nine Mile Ride. We particularly note the inspector's comment on "the loss of trees has contributed to an extensive break in the woodland cover and the loss of enclosure south of Nine Mile Ride that originated from the clearance of woodland on the adjacent sites. The gap and open vista is harmful to local views from the highway."

Whilst we are pleased to see the return of the original tree landscape buffer on the southern boundary of the site, we still see that this buffer is as small as 6.5m along some parts of the boundary, providing woefully limited screening.

In addition the three storey buildings proposed have no precedent in this area and are sited directly behind the Hatch Ride homes causing a significant loss of visual amenity and privacy. They are a rude intrusion for the existing community and represent an inappropriate density of residence.

(See Sections 91-93 of the Pineridge Decision)

Recommendations:

- a. Improve the original and now re-planned tree buffer to a minimum of 9m along the entire southern edge of the site to preserve the unique landscape character and visual amenity of the area.
- b. Re-plan based on appropriate housing styles for the area.

3.4. Biodiversity & Ecological Risk

Our existing objections still stand and as per the Pineridge decision would stress the critical role the United Charities Woodlands play in the area's biodiversity and ecological communities. The role of Nine Mile Ride as a 'green route', providing the important "green corridor" link to the many international / regional / locally important sites in this area needs to be stressed. We believe the SANG is not of sufficient size to deliver this benefit <u>in addition</u> to its primary function of diverting residents away from the Thames Heath Basin SPA.

Further, the "minor amendments" have actually made the ecological mitigation worse by removing the 7m tree barrier on the South of the site, previously identified (by the Developer Bewley) as critical to providing habitat for bats roosting in Hatch Ride / Lupin Ride. Re-locating the tree buffer to the East of the site will not help as the bats roosting in existing properties would have no adjacent trees in which to forage / roost.

Recommendation: Re-instate (as a minimum) the original 9m landscape buffer along the entire southern edge of the site.

3.5. Recognising Surface Water Flooding Risk (not ground water flooding)

We are pleased to see the re-introduction of the French Drain around the entire site and the recognition that improved maintenance of the ditch alongside Old Wokingham Road has been identified as a requirement in the drainage strategy. We thus believe that the revised drainage plans have partially addressed our original concern, by recognising that a solution to the existing surface water flooding issues needed to be provided. However, the addition of a road so close to the existing properties on Hatch Ride now presents a

new risk to surface water flooding of neighbouring properties as the water flow speed along the ground will be increased.

Further, we note that a large portion of homes built directly behind the existing homes will be elevated which with the proximity will virtually overhang the gardens. As this is an artificial elevation, we question the reason for this and suspect that it is largely due to surface water drainage concerns. If the developers have proposed this as a solution to their build on water-logged ground, how will it affect the existing homes? There should be no reason to elevate the proposed building if the drainage is adequate. Current residents are aware that this area has the largest problem with surface water and drainage.

We also note that the residual basin that has been moved northwards into the SANG is now directly adjacent to the public footpath into Lupin Ride at the western edge of the site. This will encourage dumping of rubbish, grass cuttings etc. that will reduce the effectiveness of the residual basin.

Recommendation:

- 4. Reversion to previous proposal for the tree buffer will probably be consistent with the revised surface water / drainage strategy but this needs to be checked with the Environment Agency / WBC drainage Engineers, particularly the reason for the elevated properties so close to existing housing.
- 5. Reconsider landscaping layout on west edge of Residual Basin #1 to mitigate risk of dumping. Maybe include landscaping buffer?

5.1. Transport - Road Safety Risk

No change to our previous objection – but we note that the lack of detail around the Traffic management and control on the Old Wokingham Road – in a space of c.500m there are 4 exits to the East (TRL side) and 5 exits to the West (Woodlands side) together with a Toucan crossing raises serious traffic management and road safety risks.

We would also note that Figs 8-29 on the Odyssey maps incorrectly shows an access road from the proposed site straight through the SANG. With such confusing information it is impossible to understand the plans in any detail. Clearly a road cannot go through the SANG so where exactly does it go?

We believe that WBC are also aware of the current road safety risks caused by antisocial parking on Hatch Ride, close to the development.

In the morning and afternoon school peak, Hatch Ride School parents regularly park along Hatch Ride (including close to the "emergency access" to the development) and in the evening patrons of the Chinese Restaurant park perilously close to the junction with Nine Mile Ride. Overflow parking from the development will exacerbate this situation.

Recommendation:

a)Require clarification about the road and traffic planning layout, including provision of clear plans showing both TRL and United Charities Land access points. Defer determination until joint detailed planning with the TRL site can take place over the traffic management and control on Old Wokingham Road.

b)Re-think parking provision by reducing the number of houses and/or increasing the number of allocated and unallocated parking spaces.

5.2. Transport - Modelling Assumption Risk

We wrote in December 2014 outlining our concerns that the traffic impact was based on the TRL model, produced in 2012, and therefore without the now available 2011 census data. Based on the Census data for Wokingham Without, our calculations showed that the trip rates had been underestimated by roughly 50%. This is clearly outside acceptable error bounds of even the sophisticated traffic model used by WBC.

At a macro Borough level we note the recent trend to approve 15-20% more houses (e.g. KeepHatch Beech) than that originally identified in the Site Allocation plans, and hence used as key assumptions in the Infrastructure development planning. Traffic projections for the nearby South Wokingham Distributor Road (SWDR) would appear to be significantly underestimated.

Recommendation: re-profile the traffic model to include the more up to date data (i.e. 2011 Census data), and to fully incorporate the United Charities traffic into the TRL mode so as to fully understand the sensitivity of these type of factors.

(See the WebTAG Guidance for the Senior Responsible Highways Officer: "3.2.8 Models can also be used to run "what if?" scenarios where changes in assumptions may be tested. This can help in assessing options before a preferred intervention is brought forward. It can also be used to present "sensitivity tests" around the final appraisal results to account for uncertainty that may occur in real life").

5.3. Unproven control over infrastructure delivery

As previously described, the synchronisation of delivery (scope, timings and budget) between the TRL and United Charities sites is essential for the successful delivery of the Bewley Development. At the current time, it is not clear how this could be achieved through the imposition of planning conditions on a cross border developer. Nor is a joint determination possible as the TRL application is approved in "outline" only.

Recommendation: Undertake a full determination of the United Charities Development involving a full examination of the details of the infrastructure to be provided in the TRL plans. However, these are not currently available (they will be brought forward as reserved matters in the detailed planning application as the development rolls out). Accordingly the present application should be deferred until this analysis can be properly undertaken.

5.4. No proven collaboration model between WBC/BFC

We note with disappointment the as yet unsuccessful attempts to establish both a 'Joint Triangle Forum' and a specific TRL Forum with Bracknell Forest BC despite the strenuous combined efforts of Wokingham Without Parish Council, Cllr Angus Ross (one of our ward members) and Cllr John Kaiser (Executive Member for Planning). In the light of the clear dependency on BFC for the successful delivery of the Woodlands Development, this is a serious delivery concern. It should be noted that BFC do **not** have the same dependence on WBC for delivery of the TRL site – this places WBC in a weak negotiating position.

Recommendation: Continue to drive for visible, regular and constructive collaboration forums with Bracknell Forest BC, particularly around the Triangle Area (Bracknell / Wokingham / Crowthorne) and to defer decisions on the Charities Woodland development until satisfactory levels of scrutiny have been achieved.

5.5. Failure to integrate with strategic infrastructure

We note minor improvements (inclusion of cycle path on West side of Old Wokingham Road) and the Toucan crossing to facilitate integration with the proposed TRL Cycle network. We are disappointed that no opportunity has been taken to integrate the site into wider Wokingham Borough facilities. For example, upgrading the existing PROW on the West of the site to encourage walking to Hatch Ride school; provision of access / a footpath on the North edge of the SANG to facilitate easier access to the existing Pinewood Activity Centre; the opportunity to upgrade all the footpaths to "Greenway" standard so that Wokingham Without could be linked to a broader community, including the nearby Wokingham South SDL with a range of additional community facilities.

Recommendation: Complete review of footpath and cycle path provision; seek candidate paths for Greenway designation – potentially linking with the Gorrick Woods path to Wokingham; provision of additional access and footpaths into Pinewood.

5.6. High impact due to Affordable Housing

We welcome the provision of affordable housing, so long as it is supported by the necessary infrastructure on which this demographic are particularly dependent. Logic dictates that a substantial proportion of affordable homes (47/40%), on the edge of the settlement boundary, in an area well known for having no public transport, limited shops and distant healthcare facilities is not a sound development principle, and will lead to an isolated experience for residents of the new development, potentially developing into more serious social problems.

For this reason, we would note that the 2011 Census lists only 62 dwellings were socially rented in the whole of Wokingham Without. The provision of 46 units in this modest development constitutes a 74% increase and once again highlights the unsuitability of this location for this type of accommodation.

We would note once more that no improvement to key services are to be delivered by this development and thus an edge of settlement development of affordable housing cannot be considered deliverable. We would also question why delivering the affordable homes to a more suitable location has not been considered as an option and would refer to the recently approved applications at Swallowfied (Willow Tree Works, F/2014/0940) and Bearwood Golf Course (F/2014/2119) where sites on the edge of existing settlements, commuted affordable housing payments were secured from the developers.

Recommendation: Relocate the affordable homes to a more suitable development location – i.e. to a more centrally located site within the Borough (via S106 monies secured from the developer) or the provision of substantial public transport health, sports and leisure and community facilities within the development itself to support the needs of "affordable housing" residents.

6. NEW OBJECTIONS BASED ON THE REVISED APPLICATION

6.1. Loss of privacy and light, "over-looking" of existing properties

The re-orientation of the 2 storey houses on the Southern boundary, North Eastern Boundary and parts of the Western boundary overlooking existing properties on Hatch Ride, St Michael's Cottages and Lupin Ride flats is a loss of privacy and the light. We are pleased to see that the 3 storey dwellings have been moved further away from existing properties, but that they still overlook the narrowest point of the buffer (6.5m)

Recommendation: Ensure the original landscape buffer is a minimum of 9m along the entire boundary.

6.2. Additional road behind Hatch Ride/St Michaels Cottages – noise/disturbance

The relocation of roads so close to existing properties creates noise/disturbance and is not ecologically sound. We note that during the recent consultation on possible routes of the South Wokingham Distributor Road, the Route option *furthest* from existing properties was given high weighting due to the noise pollution and we would expect the same principle to be applied to this development.

Recommendation: As previously noted, relocation of roads away from existing properties to a more central location through the site.

6.3. Emergency Access to Hatch Ride

We question whether Emergency Access to Hatch Ride between 20/22 Hatch Ride is necessary and if it is whether there is sufficient space between the two properties. Both have been extended up to their boundaries (contrary to the information on the plans provided in the application). This will lead to their privacy and amenities being severely damaged by this proposal.

Recommendation: Is Emergency Access really required – The original plan of using this entrance as a cycle track / footpath seems more appropriate for the location and should be reinstated.

6.4. Electricity sub-station adjacent to Hatch Ride Emergency Access

In the wooded end of the proposed emergency access road is an electricity sub-station. Presumably this will need to re-sited to permit vehicles through this access. However, we have not been able to locate the moved substation on any of the plans.

Recommendation: Clarification needs to be sought from Bewley Homes as to whether this is a serious error in the plans or if the sub-station has been relocated. If so the new location of this sub-station needs to be identified so that its impact can be considered.

6.5. Car Parking Spaces

We raised in December concerns relating to the number of car parking spaces (259 vs 304 predicted using Census data), under-estimates on the number of trips at peak times from the site (further exacerbating the traffic modelling problems already referred to). We

have not been able to ascertain whether this number (November 2014) has been increased in a later version of the Transport Addendum.

Experience of recent developments where car parking spaces have been underestimated has led to overflow onto existing roads, pavements and restricting already narrow roads. Constricting the capacity will lead to increased congestion on neighbouring roads together with a risk that emergency vehicles may not be able to access properties within the development causing a public safety risk.

Wokingham Without is designated as an "urban" area for purposes of Car Parking Standards, but this is demonstrably at odds with the lack of public transport and local services within the Parish. We would also observe that the parish has the highest levels of car ownership in the Borough (94% of households) will inevitably lead to a shortfall of spaces.

Recommendation: Reduce the number of houses on the site and/or increase the number of allocated and unallocated spaces so that the car parking spaces are proportionate with sufficient capacity to ensure that this development is Sustainable in the long term.

6.6. Inappropriate housing type and density for character of local area
The 3 story buildings proposed have no precedent in this area and as previously
mentioned are sited directly behind existing Hatch Ride homes which is a significant loss
of visual amenity and privacy. They are a rude intrusion for the existing community and
represent an inappropriate density of residence.

Recommendation: Re-plan the houses on the site to reflect current landscape standards – recently supported by the Pineridge Appeal decision.