

13th December 2010

David Lee
Leader
Wokingham Borough Council
Shute End
Wokingham
RG40 1BN

Open letter to David Lee, Leader of Wokingham Borough Council.

Dear David

Thank you for meeting with the Southern Parishes Planning Group on 30th November.

We thought it would be helpful to summarise the position of our group after the meeting.

Our concerns fall into three areas.

Our deep disappointment and concern about the process we are going through. We have now held three meetings with you without meaningful progress. In addition we now have the extraordinary admission that after four years of work that the Borough Council does not understand the Core Strategy and its allied policies and procedures and is still apparently unable to provide enforceable plans for managing development and transport in our area.

The decision of the Executive Committee to approve the Infrastructure and Contributions SPD including elements for south of the M4 SDL and Arborfield SDL when the masterplans for those SDLs have not been approved is inappropriate, prejudicial to other consultations and still contains elements that contradict the Core Strategy and the Inspectors Report. Because of this we have been advised that there is a case for legal challenge and there is a strong feeling within the group that this is a route we must pursue as to date we have no evidence that dialogue with WBC is at all effective. Passing the document in its current form has completely undermined any confidence we had in the whole process and those managing it. We have one last chance to get this right without legal action by dealing with the problems such as issues with phasing and transport by correcting the SPDs for the individual sites.

Our detailed concerns about some aspects of the individual SPDs were set out in submissions to WBC during the consultation up to March 2010. We are still waiting for acknowledgement of many of these points, let alone a proper consultation. We also raised a number of these points with you on 30th November again.

You promised us that you would provide your process for addressing these points by 3rd December. We understand that a meeting will now take place on 5th January; however we have not received your comments on how you will be progress the matters raised.

We think it is unlikely that a meeting on the 5th will give time for both progress and consultation before the Executive meeting on 27th January.

We are elected representatives of local councils and we have to prove to our residents that we have adequately presented their views to the borough. The continuing lack of any meaningful response from you shows an apparent lack of respect for them and undermines any confidence we or they might have that WBC is capable of effective working with local councils.

On the attached pages we will set out again the main points which we believe you can address before the Arborfield and South of the M4 SPDs are approved. We address these concerns to you personally because after failing to get a meaningful response from WBC on these matters for nearly a year it appears that only you have the authority to make progress where others have not and demonstrate that the Borough can honour its promise to listen to communities, not dump unwanted solutions on them.

If we can do all this work as volunteers and representatives in the limited time available to us then with the resources of WBC and the amount of time you have had working on the Core Strategy it is not unreasonable for you to come back to us within the timeframes you have committed to. Unfortunately the experience of the last round of consultation where you met us in July and then proceeded to give us no feedback led to the adoption of the suspect Infrastructure SPD so we do seek much stronger reassurance at this point in time.

We remain committed to finding the best possible solution for our residents and continue to offer collaboration. We offer some detailed suggestions which should be added to the relevant SPDs without challenge because they reflect both the Core Strategy and the points made by us at consultation.

We believe we have given extraordinary commitment to a settlement of these issues through negotiation and consultation.

Now we are down to a simple matter of trust. You have made several commitments to listen to us. Now we need some evidence that you have done so. Please prove to our residents that WBC is a council that puts local people first and is committed to the Governments' "Big Society" and localism agendas.

Yours sincerely

On behalf of the Southern Parishes Planning Group

Seona Turtle, Wokingham Without Parish Council
Joanne Watson Swallowfield Parish Council
John Heggadon, Shinfield Parish Council
Kevin Mayne, Finchampstead Parish Council
Jim Murphy, Arborfield and Newlands Parish Council
Laurence Heath, Barkham Parish Council

What must WBC do?

A detailed report is attached below. This summary sets out the expected actions in summary form.

On phasing

1. SPD wording

Reinstate the entirety of the Consultation Version of section 6.4 in the Arborfield SPD before adoption on 27th January 2011 and a similar paragraph in the South of the M4 SPD once consultation is complete.

In addition insert the words

“The phasing indicated in this SPD must be the basis for any planning application. Guidance is also provided in the adopted Infrastructure and Contributions SPD; however that is only indicative, for the avoidance of doubt the phasing indicated in this document reflects the adopted Core Strategy and the Council’s policies.”

2. Supply the information promised

Provide us with the information requested at our meeting and in this document about the mechanisms that will be used by WBC to ensure that all infrastructure is delivered.

On roads and transport

3. SPD and LTP wording

The Arborfield SDL masterplan, the South of the M4 masterplan and Chapter 6 of the Local Transport Plan “Strategic projects” should all have common wording:

“To assist in identifying future transport issues related to future pressures, a Wokingham Transport Model has been used. This computer model assesses the impact that future development will have in the AM peak hour in 2026.

The model shows that the introduction of four major Strategic Development Locations without any mitigation in the transport network will result in an increase in overall journey times by 22%. The model shows that delivery of infrastructure improvements set out in the Core Strategy and other transport improvements will result in significantly reduced journey times.

With network traffic growth and future development it is accepted that, without substantial infrastructure improvements, conditions will worsen. It is therefore essential to mitigate the impact that new development has on the transport network. In order to ensure this, the approach of LTP3 will directly support Core Strategy policies.

WBC will create a local transport forum for the rural areas to the South and West of Wokingham consisting of developers, local councils, transport operators and

other stakeholders. The purpose of the group will be to develop the Long Term Transport Strategy for the area as specified in the Core Strategy. The LTTS will assist in the appraisal and monitoring of proposals for delivery of the transport infrastructure specified in the Core Strategy.”

On the Arborfield layout

4. Housing

Provide us with a revised proposal for both Area B (adjacent to Barker Close/Tyler Drive) and the area to the South of NMR extension adjacent to Park Lane.

5. Road layouts

Provide wording in the SPD to say that layouts cannot be finalised until the alignment of the Arborfield Relief Road is known and that this alignment must be included in the delivery plan.

Amend text in Arborfield Garrison SPD to reflect other changes suggested in this document.

On the issues raised by local councils in respect of the Arborfield SPD

6. Answer the questions raised at the fourth time of asking.

Supporting notes on priority issues.
In priority order

1. Phasing

a. Wording of SPDs

Both the draft versions of Arborfield Garrison SPD and the South of the M4 SPD which were used for consultation up to March 2010 had detailed phasing included in the documents.

Arborfield SPD paragraph 6.4
South of the M4 SPD paragraph 6.4

The decision to include detailed phasing plans was welcomed by the groups consulted and there is absolutely no basis in consultation for the Borough Council to remove and weaken this guidance by putting weaker measures in to the Infrastructure SPD.

The adoption of weaker measures in the Infrastructure SPD is in conflict with the consultations, in conflict with the Inspector's Report and the Adopted Core Strategy which requires the phasing to be specified in detail. It is inappropriate to agree any elements of the Infrastructure SPD for Arborfield or South of the M4 before the individual SPDs have complete their process of consultation.

Core Strategy 4.53

*“Associated with each SDL, the Council will be producing individual Development Brief (including masterplan) SPD together with an overarching Infrastructure Delivery SPD. The Infrastructure Delivery SPD will **detail** the phasing of all the associated improvements to infrastructure, facilities and services within each SDL.”*

The following phrase is repeated 65 times within the Infrastructure SPD.

“The phasing strategy to be submitted as part of the outline planning application.”

It fails the requirement of the Core Strategy which requires that the phasing be detailed within the SPD, as it was in the consultation versions of the individual sites.

Action by WBC

We request the reinstatement of the entirety of the Consultation version of section 6.4 in the Arborfield SPD before adoption on 27th January and we require a similar paragraph in the South of the M4 SPD once consultation is complete.

In addition we require a statement that “The phasing indicated in this SPD must be the basis for any planning application. Guidance is also provided in the adopted Infrastructure and Contributions SPD, however that is only indicative, for

the avoidance of doubt the phasing indicated in this document reflects the adopted Core Strategy.”

Without the reinstatement of these detailed phasing paragraphs we are advised that we may be able to create a successful legal challenge to the adopted Infrastructure SPD.

b. Control over delivery

We have asked you for reassurance that once outline planning permission is granted the Borough can enforce the phasing of the delivery at Arborfield.

To this end you have agreed to tell us before the SPD is put forward for adoption

- The legal and planning status of a masterplan.
- The Borough’s ability to impose infrastructure on the first phase of a development if Developers do not include appropriate commitments.
- The mechanisms open to the borough for enforcement of phasing and penalties for non-compliance.

Action by WBC

Please provide the requested information

2. Transport and roads

During the examination in public of the Core Strategy the statement of common ground between WBC and the Arborfield Consortium said

“Both parties agree that the package of measures set out in the Core Strategy and the complementary range of land uses to be provided in the SDL will reduce the need to travel and ensure improvements for all modes of transport, including significantly enhanced public transport provision, thereby enabling sustainable travel patterns to be achieved for this SDL”

Similar statements were made for the other SDLs

The Inspector said

Sustainability

5.4 At present Arborfield Garrison neither contains nor is well connected to a range of services and community facilities. A significant part of the area is brownfield land, which would be redeveloped in a manner which would improve its accessibility to services. However, a substantial area of undeveloped ‘greenfield’ is needed to generate sufficient critical mass for a viable settlement with an acceptable number of facilities. The long term sustainability of the area therefore depends on the provision of new transport, commercial and social infrastructure to prevent unnecessary travel and promote a reasonable degree of self-containment.

5.5 It is acknowledged that current bus services to Wokingham and Reading have poor frequency and journey time. However, the consortium’s draft transport plan allows for a range of measures to support public transport services, to provide much better frequency of services, with a target modal share of 15%. These measures include the provision of a new bus interchange to enable better penetration of services into the surrounding rural areas and better links to Reading, Wokingham and Bracknell.

Transport

5.8 The extent to which the settlement meets the self-containment objective is critical to the likely need for new roads. In considering residents’ fears about inadequate capacity, I appreciate that several roads in Borough, including those serving this SDL, suffer congestion and delays. However, and in accordance with government policy, quite rightly the CS does not intend to meet unconstrained demand for continuing traffic growth, but to encourage other modes. As mentioned in #5.5 above and set out in the consortium’s evidence, planning for several public transport measures as well as improvements to pedestrian and cycle routes is underway.

5.9 Capacity on the A327 is a current problem but the Council’s modelling shows that 750 homes could be built before improvements to Arborfield Cross junction or new by pass are needed. The infrastructure requirements in CS# A7.7 refer to two links from Nine Mile Ride to the A327 and a number of possible measures to providing increased capacity along the A327, subject to further modelling. From

the transport evidence presented at the hearings I see no overriding reason why a solution should not be worked up as part of the master planning process and any necessary and proportionate funding secured through a Section 106 agreement when planning permission is sought.

The statements could not be clearer, and they entirely contradict the statements made by Matt Davey at our meeting on 30th November and the approved Infrastructure SPD.

WBC should note that the inspector said:

- WBC has to plan the transport infrastructure as part of masterplanning, not defer it or delegate it to developers to come forward with submissions.
- WBC should manage transport infrastructure itself through Section 106 agreements, not delegate delivery to developers.
- The need for bus services to achieve 15% mode share is so critical to the sustainability of the site that the inspector mentioned this detailed point.
- Cycling and walking routes are also important and there is no evidence that the current Infrastructure SPD has sufficient funding to provide them on key roads.
- The relief road is pivotal to the whole development, even outline planning can not be granted without a clear understanding of how this critical piece of infrastructure is to be provided.

We asked Matt Davey what the borough's overall vision for the roads in the south of the Borough in view of

- Four years of planning and modelling.
- A year's work on the LTP3.
- Hundreds of pages of evidence given to the Inspector.
- Dozens of submissions to the consultation on the SPDs concerning transport and traffic.

To discover that the Borough had no plan for our roads and was entirely reliant on submissions from developers was possibly the most alarming answer we received at the November 30th meeting. We regard this as nothing short of an abdication of responsibility.

What the Core Strategy actually says WBC should be doing is:

4.27

As part of the preparation of the Planning Obligations SPD, the Council is preparing a Long Term Transport Strategy (LTTS) to inform the calculation of any tariff. Planning Obligations are likely to be superseded by a Community Infrastructure Levy (CIL). It is anticipated the documents setting CIL will be subject of public examination. This will include background information such as the LTTS. The LTTS will also assist in the consultation on the Infrastructure Delivery SPD. This will be produced so that it can be adopted in tandem with the Core Strategy.

A7.2 (Arborfield)

d) The strategic transport needs of the Borough, which highlight the need for public transport, walking and cycling to be promoted alongside convenient road links in the future planning of Arborfield Garrison. The concept is underpinned by

a raft of measures to achieve this, including a development form which will provide local networks for alternative modes of travel, connecting to a strategic framework of high order movement corridors. An interchange facility between local and strategic transport networks is integral to the concept.

A7.17 (South of the M4)

To accommodate this development, a review of the local highway network will be required, leading to a package of measures to promote and achieve non-car travel, in order to help reduce congestion within and around the villages and beyond.

WBC has not provided a LTTS that encompasses the roads covered by these developments, and indeed the cumulative effect when combined with the South Wokingham SDL. WBC has not set out the requirements specified in the Core Strategy in either the Infrastructure SPD or the individual SPDs for the possible sites.

Subsequently we have had the opportunity to have in initial discussions with the Arborfield Garrison Consortium when we discovered that they share our frustration that WBC is providing no guidance or feedback on their proposals for the road network around the SDL.

Our shared questions about the surrounding infrastructure for the Arborfield SDL which have still not been answered:

- What is the strategic plan?
- What actually is planned for the road networks?
- How will the minor road network decisions get made?
- The amount of money allocated seems completely inadequate – what are our options?
- What/why Park Lane?
- Can we plan for school travel at every stage?
- Where are the greenways to Wokingham for South W and Arborfield?
- What happened to the A321 non car measures? (South W)
- What is the timing, phasing, likelihood of the Station Relief Road
- How can we mitigate against Barkham Road becoming an increasing rat run?

Action by WBC

The solution to this is relatively simple.

The Arborfield SDL masterplan, the South of the M4 masterplan and Chapter 6 of the Local Transport Plan “Strategic projects” should all have common wording:

Take the existing words in LTP Chapter 6.

To assist in identifying future transport issues related to future pressures, a Wokingham Transport Model has been used. This computer model assesses the impact that future development will have in the AM peak hour in 2026.

The model shows that the introduction of four major Strategic Development Locations without any mitigation in the transport network, will result in an increase in overall journey times by 22%. The model shows that delivery of infrastructure improvements set out in the Core Strategy and other transport improvements will result in significantly reduced journey times.

With network traffic growth and future development it is accepted that, without substantial infrastructure improvements, conditions will worsen. It is therefore essential to mitigate the impact that new development has on the transport network. In order to ensure this, the approach of LTP3 will directly support Core Strategy policies.

Additional words needed:

WBC will create a local transport forum for the rural areas to the South and West of Wokingham consisting of developers, local councils, transport operators and other stakeholders. The purpose of the group will be to develop the Long Term Transport Strategy for the area as specified in the Core Strategy. The LTTS will assist in the appraisal and monitoring of proposals for delivery of the transport infrastructure specified in the Core Strategy.

3. Layout and internal design criteria for Arborfield SDL

a. Housing areas

We have made our concerns over the two housing areas referred to as “Area B” adjacent to Barker Close/Tyler Drive and south of NMR extension/Park Lane.

We do not expect the suggested layout for Area B brought to the meeting on 30th by officers to be acceptable to residents and we hope WBC will consider further changes to increase separation between old and new housing.

We await proposals for the south of NMR extension.

Action by WBC

New proposals awaited

b. Road layout

We do not believe even outline planning permission can be granted without understanding the relationship between the internal road layouts and the relief road. This road is pivotal to the whole sustainable transport model for the site.

Failure to appropriately align the exit and internal roads will lead to unplanned congestion at some junctions and cause traffic to rat run through existing roads such as Langley Common Road and Nine Mile Ride.

Within the designs we expect WBC to specify in the SPD that

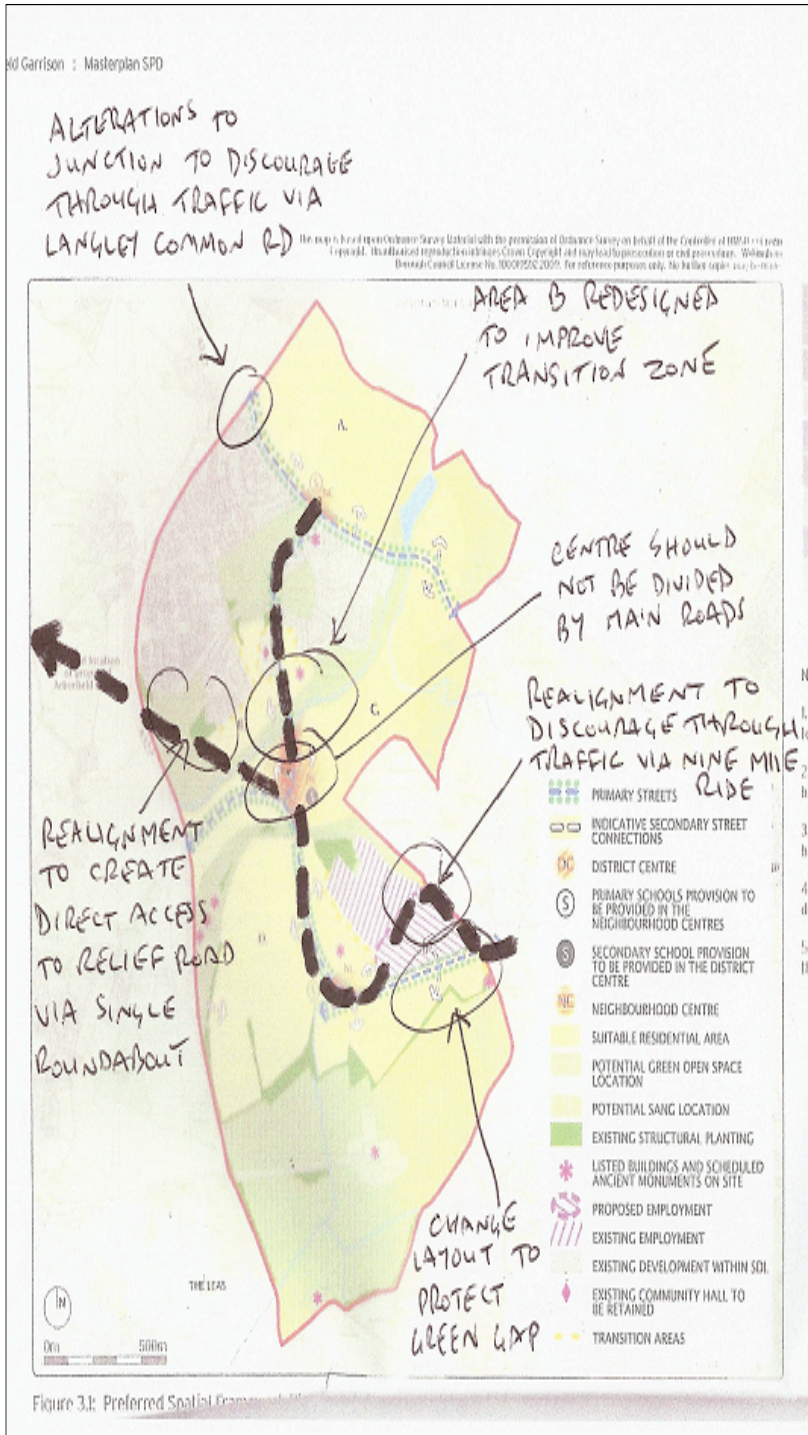
- Exit(s) to the relief road must be as easy as possible
- Junctions to Langley Common Road and Nine Mile Road must be designed to discourage through traffic.
- Design speed for spine road needs to be specified (certainly no higher than 30mph for north and south links with 20mph near schools too)

Action by WBC

Provide wording in the SPD to say that layouts cannot be finalised until the alignment of the Arborfield Relief Road is known and that this alignment must be included in the delivery plan.

Amend text in Arborfield Garrison SPD to reflect other changes suggested.

Laurence Heath of Barkham Parish Council has produced a helpful set of notes which summarises the layout issues.



4. Other points from the Arborfield Garrison SPD which have not been replied to since January 2010

These were all covered in some detail in Barkham Parish Council submission March 2010 and further mentioned to you in papers from the Southern Parishes Planning Group in both May and July.

- a. Ownership of open spaces must be clarified. Recommend they should be kept in trusteeship
- b. Play areas must be built before housing occupied
- c. Solar gain – stress importance and amend/delete diagram page 33
- d. Height of buildings – no high buildings above tree line (delete that dreadful picture page 43)
- e. Telecommunications – propose fibre optic cabling and ban satellite dishes.
- f. Parking standards must be as generous as possible.
- g. Place names and governance. Consultation required for future name of community, also future governance, i.e. community should have its own parish council. Master Plan should make reference to these items.
- h. Retail (why should the supermarket be "future proofed"? Surely it is better to create opportunity for competition, e.g. by protecting space in neighbourhood centres for retail spaces up to 1400 sq metres? Amendment 4a(i) page 49 is unacceptable
- i. Street lighting – standards to be proposed
- j. Greenways – north south link within SDL to be specified also requirements for external links
- k. Existing buildings – future of Langley House and St Eligius Church to be specified
- l. Phasing – supermarket must not reach full size until SDL nearing completion.

Action by WBC

Please respond to these points, explaining why they have not been addressed or any reason why they cannot be included in the SPD.