PLANNING REF : 252498
PROPERTY ADDRESS : 103 Nine Mile Ride
: Finchampstead
: RG40 4HX
SUBMITTED BY : Mr James Cutler
DATE SUBMITTED : 20/11/2025

COMMENTS:
LGV Consultation response - material considerations
I wish to OBJECT TO THE APPLICATIONS
A Non-compliance, Breach or Conflict with Local and National Planning Policy and associated requirements
1 Sustainable development
- No estimation is made of road network capacity, only of the existing baseline; this constitutes a failure of the plans for LGV to adhere to multiple planning requirements in the LPU (policies SS17, C1, C2, C3) and neighbourhood plan relating to transport and sustainable
development
o 4.29 of the LPU says that WBC's spatial strategy will take account of transport impacts; the consultants report should not provide the basis for any such accounting except by omission
o A development cannot be sustainable if its impact is to add upto c.10% traffic at peak times to a network that according to some estimates was at capacity in 1969 (wrt Wokingham Station level crossing)
? Further the 1974 Inspector's report for the Woosehill enquiry concluded the proposed housing site was premature due to inadequate road infrastructure
? Failure to take account of previous studies (1974 Woosehill District Plan) regarding Wokingham Station Level Crossing difficulties "which have no foreseeable solution and the fact that the road (Barkham Road) is already operating at about its theoretical capacity" is a failure of planning
? by using a +3% figure the analysis suggests that the local road network across WBC and RBC are not already at capacity when this is patently not the case
o WBC need to demonstrate or have demonstrated to them that these additional travel movements will not make living, working and travelling within and beyond WBC unsustainable
o SS5 3.h says that development proposals should have no unacceptable adverse impacts on highway safety (without defining unacceptable) or have a severe residual cumulative impact on network capacity; when a network is at or near capacity even a slight increase in demand
represents a severe residual impact - by most reasonable measures road networks are already over capacity in peak hours across WBC so these proposals fail to satisfy this policy
- Per policy SS3 2.b.v. an average of nearly 10 vehicle movements per days per dwelling as is forecast in the Transport Assessment suggests that the Proposed Development fails the test as to whether residents will be "reliant on motor vehicles"
- Per SS13 12.a estimates of 1% pedestrians and 2% cyclists fails the test as to whether the Proposed Development "prioritises active travel" (SS17 also applies e.g. 5.131, policy C3 too)
- C1 4.e advocates for "reduced reliance on single occupancy car trips" while the Transport Assessment reflects that some 90% of the additional trips taken from LGV will be single occupancy - this test surely constitutes a policy failure
- C2 requires that development proposals must "provide or make

reasonable contributions to transport infrastructure ..having regard to the cumulative impacts of the development" yet the plans themselves contain limited contribution to transport infrastructure upgrade beyond very modest road furniture, junction and crossing contributions, none of which really add capacity
- C2 2.c requires that Development Proposals "prioritise pedestrian, cycling and sustainable transport" - the absence of evidence and investment of the current LGV plans demonstrates that the LGV plans fail this test also

2 Construction Traffic Assessment (non-compliance, therefore material)
- One construction vehicle every 4 minutes at peak hour (17.5.10, p17-23) is hardly "not significant" (whether a "minor adverse effect" or "negligible" - 17.5.11).
o Construction traffic is likely to be a full or empty gravel lorry, a materials lorry, a JCB of some description or a white van with loaded
trailer
o these vehicle types are longer, wider, heavier, noisier, less well maintained with higher pollutant emissions and generally less well sighted when it comes to interactions with pedestrians, cyclists, horse riders, wheelchairs and children.
o The impact is one of the perception and stress of greater risk (from closer proximity, louder noise, inability to see raised drivers etc), of actual greater road deterioration, of near constant noise pollution from diesel and road surface noise particularly in areas of poor surface quality and perhaps also of delays caused by vehicle agility, length etc
o The plans identify that a green light for LGV is conditional on both the adoption of and adherence to the CEMP; it also needs to be extended to include the monitoring and enforcement controls that will be put in place by WBC as well as how the S106, CIL and other development income will be used by WBC to maintain road surface quality, cycle lanes, footways etc during the construction phase and after when the additional c.10% of vehicle movements will continue to block and degrade road surfaces and decrease road safety "by definition"
- CEMP
o The CEMP routing plan signally fails to address the extensive scope of construction vehicle impacts across WBC
o In particular the proximity of gravel workings and the choice of routes to the A329(M) beyond the area of interest include for example Arborfield Green Village, Park Lane and Nine Mile Ride/Extension
o Construction traffic routes need to be defined and adhered to (and monitored and enforced) over a wider area than that currently being presented

3 Transport
- Inadequate consideration of and/or inadequate validation of assessment of wider road network impacts at the following sites:
o A327 "Tally Ho" junction
o A327 Eversley bridge - effectively single track for lorries, HGVs, buses etc; medium term impacts of greater frequency of higher loads not considered in the transport assessment
o The Street, Eversley
o "Bull at Arborfield" roundabout - danger (speeds, access, volume of
traffic)

o Station Approach, Wokingham - main access route for new residents catching public transport (train) to Bracknell/Ascot/London/Reading - narrow (effectively single way with parking), slowed by crossing (sometimes for 5 or more trains in a row) - leading to slower journeys, increased traffic pollution, "road rage", slower public transport (on the buses using that route), increased noise
o A327/Shinfield Road roundabout

B Environmental Factors
1 Assessment of Flood Risk
- P8 of Application for Outline Planning Permission asserts simply that there is no change in the risk of flooding elsewhere
o By simple hydrology this cannot be the case as the sit is a known sump/water sink/overflow for the River Loddon today with frequent flooding of fields and roads
o A decrease in permeable surface increases runoff volume, frequency and intensity
o SuDS can only mitigate surface flooding by offering specific areas of high permeability and by increasing speed of flow away from site once SuDS capacity is reached and/or groundwater (water table) rfaces
? This will result in frequent surface water flooding across LGV
o In the meantime when SuDS is working and water table not saturated at LGV the water has to somewhere and as there will be ore of it it is na ve to think that this will noto result in additional risk of downstream (and upstream) flooding events
o At the very least this claim breaches whole swathes of Section 14 of the NPPF specifically the Exception Test ((a) the development must provide wider sustainability benefits to the community that outweigh the flood risk; and (b) the development will be safe for its lifetime without increasing flood risk elsewhere, and where possible will reduce flood risk overall) and at least one of the key requirements (Development must be appropriately flood resistant and resilient)

o As such this application breaches FD1:
? 1 in being inconsistent with NPPF
? 5a in failing the Exception Test by omission (when it is a requirement of the LPU as acknowledged by the FRA)
? 5bii in failing the requirement to not increase flood risk elsewhere, again by omission/presumption
o As per Fig 2A of the FRA the western half of the site is floodplain and meadow, one of the few remaining such areas along the Loddon and wider catchment - SuDS are no substitute for these "natural sponges" hydrologically or ecologically
o FRA 3.6.2 confirms the majority of the site as having naturally high groundwater and the rest being slowly permeable and seasonally wet; none of that should give WBC, engineers or house builders confidence that LGC will not be subject to frequent surface water flooding
during construction and in operation - this si confirmed in the FRA by Fig3A/B mapping showing extensive Flood Zone 3
o Neither the SFRA or the FRA make any reference to actual flood event data all of which would indicate frequency of surface water inundation, road flooding and river bank breach accords with FZ3 and a flood risk probability closer to 1:30 than the 1:100 year probability the FRA mapping implies so diverting attention from

actual development impact risks
o The FRA provides no evidence to support the assertion that "key principles" are "proven" wrt site suitability; wrt current and future flood risk this should be a red flag
- Proposals to remove much of the top soil across the site will

o remove enormous biotic richness
o remove massive water absorption capacity in what is already a very wet site
o result in increased non-river surface water flows and ponding
? increased risk of water ingress for new residents and also for xisting properties
? increased insurance premiums (especially as insurers move to more granular address based premium setting and away from older postcode zonal models)
o increase risk of flooding on existing highways (current capacity is exceeded every time it rains resulting in ponding on roads including all along Park Lane, parts of Nine Mile Ride adjacent to Longmoor
Lake) further impacting traffic flows and increasing risk of incidents
o require substantial roadside and subsurface drainage (to mitigate the above) including increasing capacity of existing drainage in "hot spots"
o increase likelihood of downstream flooding from river over-topping (particularly on Blackwater River in Eversley, Arborfield and Shinfield near Magpie and Parrot already prone to closure after heavy rains)
o proposed SuDs surface water runoff attenuation is an engineering solution to the 1:100 year flood risk that existing top soil and drains already provide
? what plans do WBC have to enforce use of any single one of the ggested SuDs measures (permeable paving, sub-surface storage, green/brown roofs, swales and detention ponds - all of these make development more expensive and developers will not want to go down this path; what presence and expertise does WBC intend to have to ensure adoption of this single SuDs measure?

2 Drainage
- Residential plots in the proposal lie outside the existing FZ3
- The Drainage Strategy tabulates greenfield runoff rates but not the post development runoff rates other than to say permeable area is
reduced by 65%
- Such a reduction will cause an increase to both the extent of onsite FZ3 and to offsite downstream (and upstream flooding) hence the breach in FD1
- The DS 8.8 states that "Flows in excess of the above design storms, which may flood from the network for storms in excess of the 1 in
100-year storm plus 40% climate change, will be kept within the internal road network, until such time as they can be directed into adjacent landscaping areas or existing vegetation/woodland. This ures that no onsite or offsite residential units are afforded an increased level of protection from flood waters until such time as the rain events become significant".
o This is an admission of impactful surface water flooding and implies that the SuDS proposals are inadequate to mitigate future likely
flooding events, another red flag

- With Flood Re due to expire during the construction phase insurers and home owners will be left to negotiate terms