

PLANNING REF : 250517
PROPERTY ADDRESS : Hyde End Road
:
: RG7 1DA
SUBMITTED BY : Mrs Jyoti Chopra
DATE SUBMITTED : 13/04/2025

COMMENTS:

Formal Objection to Richborough Estates' Planning Proposal

1. Development Site Lies Outside Approved Settlement Boundaries

Location in Richborough's Plan:

- Richborough Estates' Planning Document, Page 5, Section 2.1 confirms the site lies beyond established development limits.

Relevant MDD Policies Breached:

- ADPP1 & ADPP6 (Pages 23 & 33) clearly define that major housing growth should be confined to within allocated settlement boundaries and not spread into designated countryside.

Grounds for Objection: The land Richborough proposes to develop has not been designated for residential use. It falls outside of any defined development zone and is therefore in breach of the borough's spatial strategy. There is no policy basis or exceptional justification to support approval in such a location, and doing so would undermine the integrity of Wokingham's local development framework.

2. Lack of Suitable Infrastructure and Overburdening of Local Services

Location in Richborough's Plan:

- Richborough Estates' Planning Document, Page 10, Section 3.2 outlines the addition of 420 dwellings but offers no viable delivery plan for healthcare, education, or public transport.

Relevant MDD Policies Breached:

- CS5 and CS6 (Pages 45-46): Require that necessary infrastructure be in place or fully committed before housing is approved.

Grounds for Objection: Introducing over 400 homes without tangible commitments to schools, surgeries, roads, or amenities is wholly unsustainable. Current services are already stretched, and Richborough's vague references to "potential" future provision fail to meet the standards required under CS5 and CS6. Approval under these circumstances would cause substantial detriment to the wellbeing of both new and existing residents.

3. Inadequate Access and Emergency Evacuation Risks

Location in Richborough's Plan:

- Richborough Estates' Planning Document, Page 12, Section 4.1: All proposed road access routes lead directly toward Burghfield.

Relevant Policies Breached:

- CS6 (Page 46), and NPPF Paragraphs 110 & 112.

Grounds for Objection: The entire access design is flawed. In the event of an emergency, particularly given the site's proximity to the Atomic Weapons Establishment (AWE) in Burghfield, evacuation routes

would funnel into a single hazard-prone direction. This poses a serious risk to safety and renders the site unsuitable for large-scale residential use.

4. Threat to Wildlife and Protected Species

Location in Richborough's Plan:

- Richborough Estates' Planning Document, Page 15, Section 5.3:
Mentions ecological surveys but fails to include definitive findings or mitigation for legally protected species.

On-Site Observations:

- The area is known to support bat populations and deer habitats.

Legal Framework Breached:

- Wildlife and Countryside Act 1981

- Conservation of Habitats and Species Regulations 2017

- Policy CS17 (Page 43)

Grounds for Objection: All bat species in the UK are strictly protected by law. Interference with their roosts, habitat, or foraging areas without licensed mitigation is a criminal offence. No such licenses or species-specific surveys have been submitted, placing Richborough in direct conflict with legal and policy obligations. Proceeding with development on this site would constitute an unlawful act and destroy irreplaceable biodiversity.

5. Erosion of Landscape Character and Village Identity

Location in Richborough's Plan:

- Richborough Estates' Planning Document, Page 18, Section 6.2:

Downplays the visual impact of the development.

Policy Breached:

- CS19 (Page 49): Protects the character and identity of Wokingham's rural areas.

Grounds for Objection: The proposed development would lead to the urbanisation of an open countryside space. This land forms a natural and visual buffer between settlements, and its loss would blur the boundaries of the village, destroy scenic views, and conflict with the guiding principles of Policy CS19.

6. Richborough's History of Controversial Planning Behaviour

Across the country, Richborough Estates has repeatedly pursued developments contrary to local policies:

- Kent: Applications turned down on environmental grounds.

- Warwickshire: Transport objections halted their proposals.

- Cheshire East: Legal proceedings escalated to the Supreme Court.

Their track record of speculative building and disregard for local plans raises major concerns. Their current proposal fits a recurring pattern of undermining planning safeguards for short-term gain.

7. Dangerous Precedent for Future Planning

Should this application be approved, it would dismantle the credibility of Wokingham's Local Plan and signal to other developers that policy boundaries and protected land designations are flexible. This would:

- Encourage unplanned urban sprawl

- Overwhelm local infrastructure

- Undermine public trust in the planning system

Such a decision would be profoundly damaging and set a precedent that Wokingham Borough Council may struggle to reverse.

8. Alternative Demands Should the Application Proceed

If the Council is minded to permit the development despite these serious objections, a significantly enhanced and unconditional community benefits package must be mandated, including:

A. Front-Loaded Infrastructure Delivery

- All community facilities must be in place and usable before any new homes are occupied.
- No deferred responsibilities or conditions tied to land use should be permitted.

B. Required Community Investments

1. Transport and Roads: Widen and modernise all relevant access routes, ensuring resilience under emergency conditions.

2. Education: Full funding and construction of a new local primary school, complete with staffing provisions.

3. Healthcare: Developer must provide a designated fund for GP practice staffing and retention, in collaboration with NHS partners.

4. Amenities: Build a local hub including retail, a gym, and community spaces accessible to both new and existing residents.

C. Reduced Housing Volume

- The proposed 420 dwellings should be halved to no more than 200 homes.

D. Responsible Layout

- New dwellings must not directly back onto existing properties. A clear separation should be maintained to preserve privacy and amenity.

Legal Basis:

- BRE Guidelines recommend a minimum of 21 metres between rear elevations.

- Case law (Fitzpatrick Developments Ltd v Secretary of State, 2008) supports refusal where developments cause overlooking or disrupt residential amenity.

Conclusion

This objection is submitted on the basis of non-compliance with multiple key policies of the MDD, violations of environmental protection law, inadequate emergency provisions, and a disregard for local character.

If Richborough's proposal moves forward without these concerns addressed, the Council would be condoning both environmental harm and policy failure. We therefore strongly urge total rejection of the application. At minimum, any approval must come with robust, legally binding upfront contributions and a dramatically scaled-down plan that prioritises the existing community.