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PLANNING APPLICATION 251486

Land west of Edney's Hill Barkham Road, Barkham

Full application for the proposed erection of 16 no. dwellings with new access off Edney's Hill, plus footpaths, car ports, parking, landscaping and associated works.

OBJECTION PREPARED BY ONH PLANNING FOR GOOD ON BEHALF OF BARKHAM PARISH COUNCIL

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Summary of Objection

Barkham Parish Council strongly oppose the proposed development for the following reasons:

- The proposal conflicts with adopted development plan policies CP1, CP3, CP4, CP6 and CP11 of the Wokingham Core Strategy, CC02, CC04, CC09 and TB21 of the Managing Development Delivery Local Plan, and IRS1, IRS2, IR2, GA1, GA2 and AD4 of the Arborfield & Barkham Neighbourhood Plan due to its location outside defined development limits, its harmful impact on the Green Wedge, rural character and settlement separation, substandard highway access, and failure to deliver a design that reflects local distinctiveness.
- The proposal also conflicts with emerging Local Plan Update Policies SS5, DH1, C1, C2, FD1 and HC9, in respect of the above, which carry limited but relevant weight.
- While it is acknowledged that the delivery of 16 dwellings would make a positive contribution to housing supply in the context of Wokingham Borough Council's (WBC) 1.7-year land supply, the adverse impacts significantly and demonstrably outweigh the benefits of the scheme. The adverse impacts in this case include harm to the openness and function of the site within the wider landscape setting, erosion of settlement separation, unresolved drainage and sewage capacity constraints, and a risk of historic

land contamination that has not been adequately investigated in the context of paragraphs 129 & 135 of the NPPF, unsafe and unsuitable access via Edney's Hill and poor pedestrian and cycling connectivity in the context of paragraph 115 of the NPPF, and unsympathetic design in the context of paragraph 139 of the NPPF.

- Should WBC be minded to approve the application, it is requested that a robust pre-commencement planning condition is imposed to ensure that any contamination risks are fully assessed, remediated, and verified in accordance with national guidance.
- For information, the Parish Council is undertaking its own settlement spatial planning exercise through the Neighbourhood Plan process, although it is accepted that NPPF paragraph 50 on prematurity is not in play. Nevertheless, the proposal undermines the spatial strategy in both the adopted development plan and emerging policies.

1. Relevant Site History

1.1 In the planning history section of the applicant's Planning Statement, only 4 applications are listed. This does not reflect the full history of applications on the site. A more comprehensive list is copied below which includes an additional 4 applications not listed in the Planning Statement:

1. PA 98/677533/0 dated 9 June 1998 for **one dwelling** refused 9 September 1998 which was **dismissed at appeal on 2 June 1999** REF T/APP/X0360/A/99/10187686/P9
2. RFS/2007/00558 dating from 2007 and the notice was served leading to Appeal Re APP/x0360/C/08/2091080 on 21 Oct 2008. This concerned the unauthorised use of agricultural land for residential curtilage and enforcement notice was issued to cease residential use of the land 001346. This was **dismissed at appeal on 24 July 2009**
3. RFS/2007/00558 dating from 2007 leading to a notice being served leading to Appeal REF: APP/x0360/C/08/2091660 on 29 Oct 2008. This was an enforcement notice to remove various equipment etc. This was **dismissed at appeal on 24 July 2009**
4. F/2008/0172 dated Jan 2008 sought retrospective planning permission for change of land use from Agricultural to residential garden. This was refused and lead to Appeal REF APP/x0360/A/08/2087120. This was **dismissed at appeal on 24 July 2009**
5. Application 161412 for eight dwellings - refused by notice on 19/07/16. Subsequent appeal APP/X0360/W/16/3154856 **dismissed on 01 March 2017**
6. Application 162084 for five dwellings - refused by notice on 07/10/16. Subsequent appeal APP/X0360/W/16/3161362 **dismissed on 01 March 2017**
7. Application 171276 for an access road with other matters to be determined - refused by notice on 23/08/17. Subsequent appeal APP/X/0360/W/17/3184847 **dismissed on 19 April 2018.**
8. Application 183481 for change of use of existing equestrian building and curtilage to a dwelling following the alleged unauthorised residential use of a building which has permission **only** for equestrian use. Subsequent appeal APP/X0360/C/3218553 **dismissed 21 June 2019**

1.2 While application number 5 and 6 are of most relevance, being for the erection of new dwellings, the full planning history demonstrates the extent of refusals on the site. All the subsequent appeals were dismissed for a common reason: which broadly agreed that, in the planning balance, the harm which would be caused by residential development in this location would outweigh the benefits likely to accrue from any of the various proposals.

1.3 These decisions demonstrate that the principle of residential development on this site has been tested on multiple occasions and found to be unacceptable, primarily because of its location outside defined settlement limits, its role within the Green Wedge, and the harm caused to rural character and the pattern of development.

1.4 Earlier cases (PA 98/677533/0, RFS/2007/00558, F/2008/0172) concerned the unauthorised use of the land for residential purposes and the encroachment of domestic curtilage into agricultural land. In dismissing the associated appeals in 2009, the Inspector concluded that *“the Green Wedge covers a wide geographical area and forms an important strategic gap,”* that residential use *“would compromise the undeveloped appearance because of the development’s visually intrusive incursion into this part of the countryside,”* and that the use *“seriously erodes the open aspect of the Green Wedge due to the plot’s prominent location.”* These were observations about the site’s fundamental role in the landscape, which remains unchanged today, and as per paragraph 1.7 below is even more important in the context of approved proposals elsewhere within the Green Wedge.

1.5 Subsequent applications in 2016 for 8 dwellings (APP/X0360/W/16/3154856) and 5 dwellings (APP/X0360/W/16/3161362) were also refused and dismissed at appeal in March 2017. The Inspector found that *“the erection of new dwellings would erode the open character and quality of the area by extending the built development in an undesirable fashion,”* resulting in *“significant harm to the rural character of the area.”* Notably, this judgment was made even though the schemes retained areas of greenery, demonstrating that the harm arose from the location and principle of the development rather than the extent of built coverage. The Inspector also noted that even if WBC could not demonstrate a five-year housing land supply, the provision of 5 or 8 dwellings would have only a limited effect on addressing the shortfall and would not outweigh the identified harm.

1.6 Across all these decisions, three consistent themes emerge:

1. The site’s location outside development limits places it firmly within the countryside, engaging development plan policies presumption against new housing in such areas.
2. The site’s openness and position within the Green Wedge are integral to the separation of Barkham and Wokingham, and any new built form here would cause irreversible harm to that separation.
3. The harm identified is inherent to the location and landscape function of the site, not dependent on the specific number of units proposed.

1.7 There has only been one material change in the site’s policy context or physical setting to alter these conclusions. The Blagrove Lane appeal (APP/X0360/W/24/3354667) has further eroded the Green Wedge and therefore, greater emphasis should be placed on that which remains. Indeed, the current proposal for 16 dwellings represents a greater scale of development than the previously refused schemes, intensifying the urban encroachment, traffic generation, and erosion of the rural gap that the Inspectors have already found to be unacceptable.

2. Relevant Policies

2.1 The policies of the Wokingham Core Strategy 2010 which are of greatest relevance to this representation:

CP1, CP3, CP4, CP6 and CP11

2.2 The following policies of the Managing Development Delivery Local Plan 2014 which are of greatest relevance to this representation:

CC02, CC04, CC09 and TB21

2.3 The Arborfield and Barkham Neighbourhood Plan (ABNP) was made in 2020 and contains the following policies which are of greatest relevance to this representation:

IRS1, IRS2, IR2, GA1, GA2 and AD4

2.4 The Local Plan Update (LPU) was submitted to the Secretary of State for examination on 28 February 2025. Although not yet part of the statutory development plan, its draft policies should hold weight as a material consideration in planning balance. The weight to be attributed to the emerging LPU policies is informed by paragraph 49 of the NPPF 2024. This advises that weight can be applied according to the plan's stage of preparation, the extent to which there are unresolved objections, and the degree of consistency with the NPPF. In the Officer's Report for a recent application in the parish for 70 dwellings (ref 250735), the Officer stated the following:

'The Council acknowledges that a number of substantive comments were received in relation to LPU Policies SS2 and SS5 and as such, there are unresolved objections. Therefore, the Council considers that only limited weight should be applied at this stage to the conflict with the LPU.'

Given that Policy SS5 is also relevant to this application, the Parish Council considers only limited weight should be afforded to the LPU. The following policies from the LPU are of greatest relevance to this application:

SS5, DH1, C1, C2, FD1 and HC9

2.5 As per the applicant's Planning Statement at paragraph 5.2 the development plan is the starting point for decision-making unless material considerations indicate otherwise. The National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG) are material considerations.

3. Key Issues

3.1 The Parish Council considers there are four key issues in addition to a number of other adverse effects:

- Highways/access
- Design
- Housing land supply
- Green wedge

Highways/Access

3.2 The proposed vehicular access would be taken from Edney's Hill, a particularly narrow and winding rural lane with a national speed limit of 60mph, no pavements, blind bends, and several pinch points along its length. This road is unlikely to be suitable for accommodating the additional vehicular movements associated with a development of 16 dwellings. Wokingham Core Strategy Policy CP3 requires development to be well designed, safe, and accessible,

while Policy CP6 seeks to manage travel demand by ensuring new development does not give rise to an unacceptable transport impact. Arborfield and Barkham Neighbourhood Plan Policy GA1 specifically seeks to minimise additional traffic on roads that are unsuitable for the type, scale, and volume of traffic likely to be generated, and Policy GA2 supports the creation of safe green routes for non-motorised users.

3.3 The deficiencies of Edney's Hill have already been recognised in previous planning decisions. In 2022, an application (ref 220991) for rear access to Edney's Hill serving a single dwelling was refused on the grounds of substandard visibility splays. That access point (see Fig.1) offered significantly better sightlines (see Fig.2 and Fig.3) than the one now proposed for 16 dwellings. Visibility measurements from the earlier application achieved at least 2.4m x 70m in both directions, yet even with this superior geometry, permission was refused. The current proposal's visibility is materially worse (see Fig.4 and Fig.5). Measured from the required set-back of 2.4m, the sightlines in both directions are heavily obstructed by foliage and road alignment. Looking north towards Barkham Road, the 43m visibility point lies just beyond the 30mph sign and dangerously close to the junction. Looking south, the 43m point extends only to the start of a blind bend, where an approaching vehicle would have little time to react. Such limitations are in direct conflict with Local Plan Update Policy C2, which requires development to demonstrate highway safety and appropriate junction design, and with paragraph 115 of the NPPF, which requires safe and suitable access to sites.

3.4 The applicant's Transport Statement and Travel Plan attempt to offset these deficiencies by emphasising the availability of great pedestrian and cycling infrastructure. However, these claims do not reflect on-the-ground conditions. Barkham Road, which provides the primary pedestrian and cycle artery link to Wokingham, carries over 5,000 vehicles per day, has no dedicated cycle lanes, and is subject to high traffic speeds. The volume of traffic will only increase significantly once all the remaining houses in Arborfield Green and other planned developments are completed. Although the Travel Plan suggests that the road's width and low speed environment make it conducive for cycling, this ignores the reality of heavy vehicle flows and the lack of segregation from traffic. The plan also identifies Public Byway BA19 as a potential cycling route, accessible via Barkham Road and Aggisters Lane. In practice, this link has been blocked at one end for more than twenty years and its surface is in such poor condition that it is not viable for regular cycling, further undermining the proposal's claims of sustainable transport accessibility.

3.5 Similarly, the assertion that there is "good pedestrian infrastructure" is misleading. The only identified crossing facility is a refuge island on Barkham Road very close to the Bearwood Road junction. This location is considered unsafe, being positioned where vehicles accelerate towards or away from the roundabout and offers no safe provision for pedestrians accessing the site from Edney's Hill. There is no footway on Edney's Hill itself, meaning that pedestrians, including children, the elderly, and those with mobility impairments, would be required to share the carriageway with fast-moving vehicles. This arrangement is contrary to Core Strategy Policy CP6 and Local Plan Update Policy C1, which require new developments to provide safe and convenient access for all users, and to NPPF paragraph 115, which places an emphasis on delivering safe and suitable access for all modes of travel.

3.6 The assertion in the Travel Plan (5.3) that *'the site is in a good location to promote sustainable transport by providing frequent bus services to Wokingham and Reading'* is misleading. It should be pointed out that there is only one bus every half an hour from the site, and this takes a somewhat twisted indirect route especially to Reading, taking over an hour to reach there from the site. The Travel Plan (2.4) claims *"There are a number of local amenities and facilities within a reasonable walking or cycling distance"* but in the context of The

Wokingham Borough Design Guide SPD dated Jun 2012 this states that for locations to be sustainable, neighbourhoods should be created that have a range of facilities with 800M (10 mins) walking distance to encourage travel by foot or by bicycle. The only amenity or service within that actual distance (as pointed out) of the site is a small Village Store and Post Office. The Location is therefore not sustainable for easy access to Shopping centres, schools and medical centres (which are mostly at least a mile away)

3.7 Taken together, the constraints of Edney's Hill, the unsafe and incomplete pedestrian and cycling connections, and the inaccurate portrayal of sustainable transport options demonstrate that the proposed development does not accord with the transport policies of the adopted Core Strategy, the MDD Local Plan, the Arborfield and Barkham Neighbourhood Plan, or the emerging Local Plan Update, nor does it meet the safety and accessibility requirements of the NPPF. The residual cumulative impact on highway safety and the transport network would be severe, providing clear grounds for refusal.

3.8 There are significant pressures on transport in the parish and WBC's Local Plan policies seek to encourage a modal shift in an area constrained by access to public transport and high levels of car ownership. Within the context of conflict with adopted and important local planning policies and national guidance on transport the Parish Council considers that a failure to provide safe and suitable access for all users should carry significant weight against the proposal.



Figure 1: Proposed Access from Refused Application (ref 220991)



Figure 2: Sight Lines from Refused Application (220991)



Figure 3: Sight Lines from Refused Application (220991)



Figure 4: Proposed Access of this Application



Figure 5: Location of Proposed Access of this Application on the Right-Hand Side

Design

3.9 The design, scale, and form of the proposed development are not in keeping with the established character of Barkham and fail to respond positively to the local vernacular as required by development plan policy and the NPPF. Wokingham Core Strategy Policy CP3 requires development to be of high quality, well designed, and to respect the character of the surrounding area. Managing Development Delivery Local Plan Policy CC04 places similar emphasis on sustainable design and construction that is sympathetic to the local context. At the neighbourhood level, Arborfield and Barkham Neighbourhood Plan Policy IR2 gives weight to the Barkham Village Design Statement (VDS) and seeks to ensure that development recognises, respects, and preserves the rural setting of settlements. The emerging Local Plan Update Policy DH1 reinforces these principles by requiring place-making and quality design which responds to site context, while paragraph 139 of the NPPF states that proposals should be refused where they fail to reflect local design policies and government guidance.

3.10 The applicant's Planning Statement claims at paragraph 6.41 that the *"scale, form, and pattern of the proposed scheme reflects and responds to the established form of development within the surrounds."* However, when examined against both the VDS and the actual built form of nearby properties, the scheme does not achieve this. The surrounding area is characterised by larger detached *"one and a half storey"* chalet-style dwellings with dormer windows and varied roof forms, often hipped or half-hipped, which create a softer roofline and integrate with the rural setting. The VDS specifically states that *"houses with high ridgelines should be discouraged as they tend to dominate their surroundings"* and that *"well-designed gabled, half-hipped and hipped roof shapes are to be encouraged, as are dormer windows of an appropriate scale with pitched roofs."*

3.11 In contrast, the proposed dwellings include several rooflines with long, uninterrupted high ridge lines and slab-sided forms, which would appear visually bulky and incongruous in this setting. Window proportions also conflict with the VDS guidance: section 13 of the statement advises that the size and positioning of windows should be appropriate in relation to the building, yet the submitted elevations show small, narrow window openings that appear out of proportion and fail to break up the mass of the façades.

3.12 The proposed materials do not convincingly reflect the established local palette. While good quality red brick is proposed for some dwellings — consistent with much of Barkham — the inclusion of slate roof tiles and black-stained weatherboarding, particularly on car ports, is discordant with the prevailing use of red clay tiles and the absence of black weatherboarding in nearby properties. Photographs of nearby dwellings — including Villa Field, Fern House, Fisher House, and properties at 353, 380, and 378 Barkham Road (see Fig.6-9) — illustrate the prevailing character: chalet-style dwellings with sympathetic rooflines, red tiled roofs, and no use of black weatherboarding. These houses, some as close as 50–70 metres from the site, embody the character described in the VDS and demonstrate that the proposed design is a marked departure from the area's established form.

3.13 The applicant's assertion at paragraph 6.45 of their Planning Statement that the design uses materials forming part of the local vernacular is therefore not borne out in practice. Instead, the proposal introduces building forms, roof treatments, and materials that would conflict with the surrounding context, eroding the rural character that the VDS and Neighbourhood Plan policies seek to preserve.

3.14 In light of the above, the scheme fails to comply with Core Strategy Policy CP3, MDD Policy CC04, Neighbourhood Plan Policy IR2, and Local Plan Update Policy DH1. It also

conflicts with NPPF paragraph 139, which is clear that permission should be refused for development that fails to reflect local design policies.

3.15 Within the context of conflict with adopted and important local planning policies and national guidance on design the Parish Council considers that a failure to comply with NPPF paragraph 139, should carry significant weight against the proposal.



Figure 8: Villa Field, Barkham Hill



Figure 7: Fern House, Barkham Hill



Figure 9: 353 Barkham Road



Figure 6: 378 and 380 Barkham Road

Housing land supply

3.16 It is accepted that the proposed development would make a contribution to the supply of housing in Wokingham Borough. Given WBC's acknowledged shortfall, currently amounting to around 1.7 years' worth of supply, the delivery of 16 additional dwellings would attract positive weight in the planning balance, although not of a significant level.

3.17 It is worth noting that recent appeal decisions demonstrate that the benefits of small-scale housing developments in the countryside must be proportionately weighed. In the 2016

appeals relating to smaller proposals at this site (APP/X0360/W/16/3154856 and APP/X0360/W/16/3161362), the Inspector made clear that even in the absence of a five-year housing land supply, permission should be refused where adverse impacts significantly and demonstrably outweigh the benefits. This approach was echoed in the July 2024 Swallowfield appeal (APP/X0360/W/24/3340006), where the Inspector accepted that although WBC's shortfall was acute, the weight given to housing delivery could be tempered in light of recent high levels of delivery in the area and the lack of essential need for the proposed additional units in the short term.

3.18 The same reasoning applies here. This part of the Borough has seen substantial housing growth in recent years through the delivery of strategic sites, and the proposed 16 dwellings would make only a negligible impact on the overall shortfall. The Blagrove Lane appeal (APP/X0360/W/24/3354667) reinforces the point that small schemes in unsustainable locations should not be approved simply because they offer a numerical addition to housing supply; the location, scale, and policy context must also be taken into account. Here, the site lies beyond defined development limits and, in the countryside, contrary to Core Strategy Policy CP11 and MDD Policy CC02, and within an area where Arborfield & Barkham Neighbourhood Plan Policy IRS1 seeks to preserve the separation of settlements. Local Plan Update Policy SS5 continues this restrictive approach to development in the countryside. The cumulative impacts of the scheme mean it conflicts NPPF paragraph 135 with respect to improving the overall quality of the area.

3.19 WBC's Core Strategy at paragraph 2.88 is clear that rural areas generally lack good access to public transport and that new housing in such locations risks increasing traffic levels due to the Borough's high rates of car ownership. This site exemplifies those concerns, being in a car-dependent location with a lack of safe pedestrian connectivity to essential services.

3.20 While the housing delivery benefit attracts positive weight, it must be balanced against the severe harm identified in footnote 9 of NPPF paragraph 11 d) ii). The delivery of 16 dwellings in this location does not outweigh those harms. The proposal fails to comply with Core Strategy Policies CP1 and CP11, MDD Policy CC02, Neighbourhood Plan Policy IRS1, and Local Plan Update Policy SS5, and does not accord with the provisions of NPPF paragraph 11(d)(ii).

3.21 Within the context of conflict with adopted and important local planning policies and national guidance on housing land supply the Parish Council considers that the positive weight attached to the delivery of 16 dwellings should be tempered and a balance struck against its adverse effects.

Green Wedge

3.22 The application site lies within the area identified as the Green Wedge between Barkham and Wokingham, a stretch of open countryside which plays a vital role in preventing the coalescence of the two settlements. Wokingham Core Strategy Policy CP11 strictly controls development outside defined settlement limits, particularly where it would harm the separate identity of settlements or the rural character of the countryside. Managing Development Delivery Local Plan Policy TB21 requires development to maintain and enhance landscape character, while Arborfield and Barkham Neighbourhood Plan Policy IRS2 seeks to "*recognise, respect, and preserve the identity and rural setting of settlements*". The emerging Local Plan Update continues this approach through Policy SS5, which restricts development in the countryside. Paragraph 187 of the NPPF emphasises the need to protect the essential countryside character of such areas. Paragraph 129 of the NPPF emphasises the desirability of maintaining an area's prevailing character and setting. Paragraph 135 of the NPPF seeks to ensure that

developments function well and are visually attractive. These 3 paragraphs are all in NPPF footnote 9 and can therefore be linked to the application of paragraph 11 d) ii) regarding adverse impacts.

3.23 The role of this site within the Green Wedge is particularly sensitive. It forms the last remaining undeveloped open space along this stretch of Barkham's southern edge. Its open aspect and prominent location mean that any development here would have a disproportionate effect on the perception of separation, especially given the context of the site with Edney Hill and its sporadic but concentrated nature of linear development along it. Allowing development here would also risk encouraging further infill development along Edney's Hill. Coalescence is a process and whilst some development in the Green Wedge may not result in coalescence the site will contribute to the coalescence of separate and distinct communities and the rural character of the area and is therefore a vital consideration. The applicant's Landscape and Visual Appraisal asserts at section 2.1.9 that the scheme would have *"no detrimental impact on landscape, character and scenic beauty."* This assertion is considered incorrect given the site's high visibility and the cumulative effect that new built form would have on the openness of the Green Wedge and coalescence.

3.24 The harm associated with development on this site has been recognised repeatedly in appeal decisions. In earlier proposals for 5 and 8 dwellings, Inspectors consistently concluded that:

- *"The Green Wedge covers a wide geographical area and forms an important strategic gap";*
- *"The residential use would compromise the undeveloped appearance because of the development's visually intrusive incursion into this part of the countryside";*
- *"The residential use of this part of the Green Wedge is harmful to the Countryside's quality";* and
- *"The development seriously erodes the open aspect of the Green Wedge due to the plot's prominent location."*

3.25 In those appeals (APP/X0360/W/16/3154856 and APP/X0360/W/16/3161362), the Inspector further concluded that the erection of new dwellings *"would erode the open character and quality of the area by extending the built development in an undesirable fashion,"* giving rise to *"significant harm to the rural character of the area."* These conclusions are applicable to the current proposal, notwithstanding the difference in housing numbers. The fundamental issue is the principle of development on this land, not merely the quantum.

3.26 The proposal therefore does not accord with Core Strategy Policy CP11, MDD Policy TB21, Neighbourhood Plan Policy IRS2, or LPU Policy SS5. It also conflicts with the NPPF's recognition (paragraph 187) that valued countryside areas should be protected for their landscape, recreational, and ecological importance. The erosion of the openness and rural quality of this part of the Green Wedge would be permanent and irreversible, and in planning terms, the harm would significantly and demonstrably outweigh any benefits of the development.

3.27 Within the context of conflict with adopted and important local planning policies and national guidance on protecting gaps and/or green wedges, the Parish Council considers the need to protect this prominent location from the principle of development should carry substantial weight due to the sensitive nature of the location and the fact it has been further eroded by the recent Blagrove Lane Appeal decision (APP/X0360/W/24/3354667).

Other Matters for Consideration

Drainage/sewage system

4.1 The site presents significant drainage and sewage capacity concerns that have not been adequately addressed in the application. The land falls steeply with a drop of approximately nine metres, and the applicant's own geo-environmental report notes at section 6.5 that the proposed development could affect the stability of the slope. The report also records groundwater levels as high as 0.7m from the surface in some areas, a factor which, in combination with the site's topography, increases the risk of rapid surface water runoff to the lower part of the site and adjoining properties. This is particularly relevant given local experience of drains overflowing in the area after only modest rainfall.

4.2 The site is within a designated Nitrate Vulnerable Zone (Appendix D, page 56, para 10.1.6 of the applicant's report), meaning it is at higher risk from agricultural nitrate pollution, with potential to exacerbate water quality issues if drainage is not carefully managed. The shallow groundwater conditions further heighten the risk of pollution and flooding, particularly for properties downslope.

4.3 Core Strategy Policy CP4 requires that new development is supported by adequate infrastructure, including surface water drainage, and that it does not place unacceptable strain on existing systems. Managing Development Delivery Local Plan Policy CC09 states that development will not be permitted in areas at risk of flooding unless it is demonstrated that the proposal will be safe for its lifetime without increasing flood risk elsewhere, and that appropriate mitigation measures are incorporated. Arborfield and Barkham Neighbourhood Plan Policy AD4 reinforces this requirement locally, expecting development to address local flood risk management issues in both design and layout. The emerging Local Plan Update Policy FD1 similarly requires comprehensive assessment and management of flood risk, including groundwater and surface water sources.

4.4 The applicant has not provided the necessary infiltration testing to determine an appropriate sustainable drainage solution, citing "insufficient drop in water levels" to carry out the survey. This omission is contrary to national and local policy requirements that flood risk assessments and drainage strategies be based on full site-specific evidence. The infiltration section of the applicant's report even recommends against building during winter months unless sump pumps are used, highlighting the marginal drainage conditions. The lack of a tested and deliverable drainage solution conflicts with NPPF paragraph 175, which requires that development in areas at risk of flooding be appropriately flood-resistant and resilient, and be supported by a site-specific flood risk assessment that accounts for all sources of flooding.

4.5 In the context of climate change, with projections of hotter, drier summers and wetter winters, the site's clay soils are likely to experience seasonal shrink-swell movement, increasing the risk of subsidence and further stressing both surface water and foul drainage systems. Local evidence suggests the foul sewage network is already operating at or near capacity, yet the application contains no detailed assessment of the ability of the network to accommodate additional flows from sixteen new dwellings without causing downstream flooding or pollution. Which does not consider the provision of NPPF paragraph 129 c) in terms of infrastructure and services. There is a real concern that because of this the development will not function well as per the provisions of paragraph 135. Should WBC be minded to approve this application, it is essential that the shortcomings of the local sewage system are addressed. The Parish Council recommends a Grampian-style planning condition is imposed restricting the commencement or occupation of a development until under-capacity sewerage infrastructure is improved.

4.6 In summary, the application fails to demonstrate compliance with Core Strategy Policy CP4, MDD Policy CC09, Neighbourhood Plan Policy AD4, and LPU Policy FD1. The absence of robust infiltration data, the high groundwater levels, the location within a Nitrate Vulnerable Zone, and the existing pressure on foul drainage infrastructure collectively point to an unacceptable risk that the development would increase flood risk on and off-site, in conflict with the requirements of the development plan and the NPPF.

4.7 Within the context of conflict with adopted and important local planning policies and national guidance (including the specific provisions of NPPF paragraphs 129 and 135) on drainage and sewerage the Parish Council considers that a failure to provide evidence of adequate foul drainage capacity, inadequate sustainable drainage strategy and the risk of off-site flooding should carry significant weight against the proposal.

Contamination

4.8 The applicant's own Phase 1 Desk Study and Geo-environmental report identify a potential low-to-medium risk of contamination on the site that may impact both human health and the environment. The report notes possible sources of metal and inorganic substances and refers to aerial imagery from the early 2000s showing areas of stored materials, parked vehicles, and stripped earth across the site. Barkham Parish Council has also received a local account from a long-term resident who witnessed, in approximately 2003–2004, a large hole being excavated in the eastern part of the site into which bulky mixed building waste was believed to be buried. Some of this waste appeared to include corrugated asbestos sheeting, a common roofing material of the period, raising the possibility of asbestos contamination. Aerial photography from January 2003 (see Fig.10) shows piles of spoil on the western side of the site, while imagery from January 2004 (see Fig.11) shows a bare reinstated patch in the eastern area consistent with backfilling.

4.9 Despite these historic indicators, the potential for buried building waste — and the associated risk of asbestos or other hazardous material — does not appear to have been fully investigated. The Phase 1 report recommends further assessment if potential contaminant linkages are identified. The Government's Land Contamination Risk Management (LCRM) guidance requires that, where such linkages may exist, a detailed intrusive site investigation should be undertaken (Tier 2). The applicant's Phase 2 work appears to focus on general ground conditions for development and does not address the specific historic burial of building waste. While the report concedes that *"given the long human history of the surrounding area, it is always possible that some previous undiscovered contamination may be encountered,"* no targeted investigation of the described area has been carried out.

4.10 Core Strategy Policy CP3 supports development that provide a safe scheme, while Policy CP4 confirms that necessary site infrastructure and remediation measures can be secured by planning obligation or condition. The emerging Local Plan Update Policy HC9 explicitly requires the identification, assessment, and, where necessary, remediation of contaminated land and water. NPPF paragraphs 196 and 197 are clear that planning decisions should ensure a site is suitable for its intended use, taking account of contamination risks and that adequate remediation measures are in place before development proceeds.

4.11 Given the historical accounts and the applicant's own acknowledgement of potential risks, Barkham Parish Council is concerned that the risk of contamination has not been fully investigated. Should WBC be minded to approve this application, it is essential that a precautionary approach is taken through the imposition of a robust pre-commencement

condition. The Parish Council recommends a planning condition is imposed, based on wording set out in the Planning Inspectorate's model conditions for contamination on smaller developments, which requires:

'No development shall take place until an assessment of the risks posed by any contamination, carried out in accordance with British Standard BS 10175: Investigation of potentially contaminated sites - Code of Practice and the Environment Agency, Land Contamination Risk Management (LCRM) (or equivalent British Standard and Model Procedures if replaced), has been submitted to and approved in writing by the local planning authority. If any contamination is found, no development shall take place until: i. a report specifying the measures to be taken, including the timescale, to remediate the site to render it suitable for the development hereby permitted has been submitted to and approved in writing by the local planning authority; ii. the site has been remediated in accordance with the approved measures and timescale; and iii. a verification report has been submitted to and approved in writing by the local planning authority.'

If, during the course of development, any contamination is found which has not been previously identified, work shall be suspended until: i. additional measures for the remediation of the site have been carried out in accordance with details that shall first have been submitted to and approved in writing by the local planning authority; and ii. a verification report for all the remediation works has been submitted to and approved in writing by the local planning authority.'

4.12 The imposition of this condition would aid compliance with Core Strategy Policies CP3 and CP4, Local Plan Update Policy HC9, and NPPF paragraphs 196–197. Without it, there remains a significant risk that previously unidentified contamination could pose harm to human health, the environment, and the safe delivery of the development.

4.13 Within the context of conflict with adopted and important local planning policies and national guidance on contamination the Parish Council considers that a failure to adequately investigate potential contamination risk should carry limited weight against the proposal. This is because if the application is approved, the Parish Council is seeking to address this issue through a planning condition.

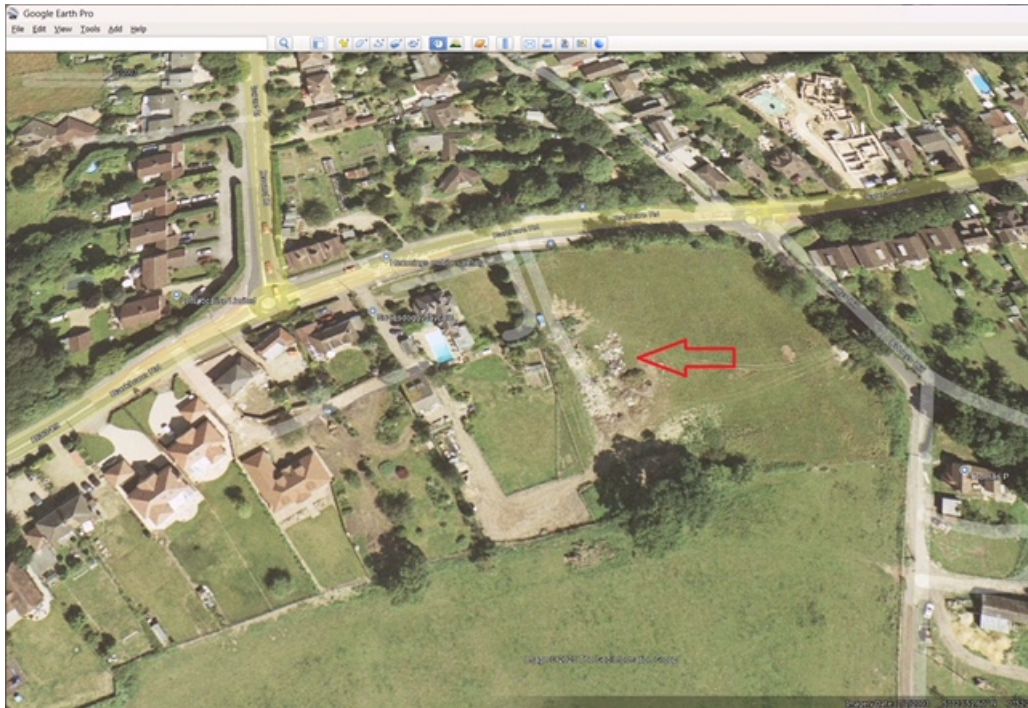


Figure 10: Aerial Photography from January 2003 Shows Piles of Spoil on the Western Side of the Site



Figure 11: Imagery from January 2004 Shows a Bare Reinstated Patch in the Eastern Area Consistent with Backfilling

5. Conclusion

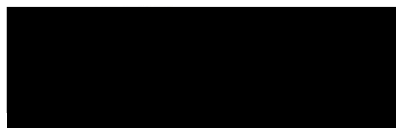
5.1 Barkham Parish Council therefore requests that this application is not approved for the following reasons:

5.2 The site lies outside the defined settlement boundary of Barkham and conflicts with the spatial strategy set out in Core Strategy Policies CP1 and CP11, MDD Policy CC02, and Neighbourhood Plan Policies IRS1 and IRS2, which direct housing to locations that can be sustainably accommodated within or adjoining the built-up area, supported by existing infrastructure and services. This is not the case here.

5.3 Other material considerations, including relevant appeal decisions, reinforce the conclusion that development in this location is not sustainable. Limited weight can be attached to the emerging Local Plan Update at this stage, but its policies are consistent with the adopted plan in resisting unsustainable development in the countryside.

5.4 In the context of NPPF paragraph 11(d)(ii), the adverse impacts of granting planning permission — including harm to the rural character and landscape setting, failure to respect local design principles, unsafe and unsuitable access arrangements, increased car dependency, unresolved drainage and sewage capacity issues, and potential contamination risks — would significantly and demonstrably outweigh the economic and social benefits of limited housing delivery. Accordingly, planning permission should be refused.

Yours sincerely,



Ellen Tims
Clerk to Barkham Parish Council