

PLANNING REF : 252430  
PROPERTY ADDRESS : 2  
: The Naylor's Naylor's, Swallowfield, Berkshire  
: RG7 1RZ  
SUBMITTED BY : Mr Adrian Louth  
DATE SUBMITTED : 24/11/2025

COMMENTS:

FORMAL PLANNING OBJECTION

Application: 252430 - Land East of Trowes Lane, Swallowfield

Proposal: Outline application for up to 79 dwellings

Dear Planning Officer,

I am writing to object to application 252430 (Land East of Trowes Lane, Swallowfield) on the grounds that the proposal is in clear conflict with the development plan, is unsupported by essential technical evidence, and results in significant unmitigated harm. I request that the application be refused, or at minimum deferred until the applicant provides the missing mandatory assessments listed below.

My detailed comments are as follows:

1. Conflict with the Settlement Strategy (CP11 and CP17)

Swallowfield is designated a Limited Development Location, where only modest, planned growth is appropriate. The village has already experienced major unplanned expansion through:

- 81 dwellings approved on appeal on the west side of Trowes Lane, and
- additional smaller developments already permitted in the parish.

The proposed 79 additional dwellings would cause cumulative growth far beyond what CP11 and CP17 envisage. This scale is incompatible with the settlement hierarchy and erodes the rural character and function of Swallowfield.

The proposal therefore conflicts with the development plan when read as a whole.

2. Cumulative Landscape and Character Harm

The 81-home appeal decision confirmed Trowes Lane is a rural lane defined by hedgerows, verges and ditches. Placing substantial development on both sides of this lane would:

- create a suburban corridor at the village edge,
- significantly alter the rural approach into Swallowfield, and
- result in enclosure and urbanisation of a key settlement boundary.

This represents material landscape and character harm contrary to CP1, CP3, CP11, and TB21.

### 3. Unsafe and Inadequate Access via Trowes Lane

The upper section of Trowes Lane, near the junction with The Street, is narrow, constrained, and has substandard geometry. No evidence has been provided demonstrating that:

- the carriageway width is adequate,
- safe visibility splays can be achieved,
- footways can be provided,
- emergency/refuse vehicles can safely pass, or
- widening could occur without removal of hedgerows and verges.

These are essential assessments for a major residential development but are missing.

Without detailed drawings, measurements, and a Stage 1 Road Safety Audit, the application fails to demonstrate safe and suitable access, as required by the NPPF (para 111) and policies CP6 and CP9.

This issue alone warrants refusal or deferral.

### 4. Lack of Drainage and Flood Risk Evidence

The application does not include a Flood Risk Assessment, surface-water strategy, or evidence of foul water network capacity. These are mandatory for a development of this scale.

Given the cumulative development in the village and the site's agricultural nature, the LPA cannot assess run-off, attenuation, or discharge rates. The proposal therefore fails to comply with NPPF requirements to avoid increased flood risk.

### 5. Agricultural Land Classification Not Provided (Potential Loss of BMV Land)

No Agricultural Land Classification survey is included. If the site comprises Grade 2 or Grade 3a soil, it would qualify as Best and Most Versatile (BMV) agricultural land.

The NPPF requires explicit justification for developing BMV land. Without an ALC survey, this justification is absent.

This is a significant omission.

### 6. Biodiversity Net Gain (BNG) Requirements Not Met

As a major application, the scheme must demonstrate at least 10% Biodiversity Net Gain under the Environment Act 2021.

The application includes:

- no Biodiversity Metric,
- no habitat baseline plan,
- no 30-year management plan, and
- no confirmation of on-site vs off-site units.

Without a formal Biodiversity Gain Plan, the application is not compliant and cannot be determined.

## 7. Insufficient Information on Education Capacity

The proposal does not assess:

- capacity at nearby primary schools,
- secondary school availability,
- whether children will need long-distance travel, or
- whether cumulative demand (including the 81-home scheme) has already exhausted forecast places.

Education impact is a material consideration. Without a capacity assessment or mitigation strategy, the application is incomplete.

## 8. Healthcare Capacity Not Assessed

The applicant has not provided any assessment of GP or healthcare capacity. Swallowfield Surgery already serves a wide rural area and is known to experience high demand.

No evidence is provided that the service can absorb the additional population, nor are mitigation measures proposed.

## 9. Unsustainable Transport and Car Dependency

Trowes Lane lacks continuous pavements and offers limited safe pedestrian routes to village facilities. There is no meaningful cycle infrastructure, and bus services are limited.

The site therefore promotes car dependency, contrary to NPPF 105-112.

## 10. Site Not Allocated in the Emerging Local Plan

The emerging Local Plan, supported by the LPA's evidence base, does not allocate this land for development. Only the west-of-Trowes-Lane site was considered for growth.

Approving this speculative proposal would prejudice the plan-making process and undermine the NPPF's plan-led approach.

## 11. Wokingham's Strong Housing Delivery Reduces the Weight of the Tilted Balance

While the Council cannot demonstrate a full five-year housing land supply, Wokingham has consistently over-delivered housing against its Delivery Test requirements, historically delivering around 170%-200% of its annual requirement.

This means:

- the borough is not facing a delivery crisis,
- the tilted balance should be applied with reduced weight, and
- the claimed housing benefit of this scheme is diminished.

Accordingly, the significant harms identified above outweigh any benefits.

## Conclusion

This application is incomplete, non-compliant, and contrary to policy on multiple grounds:

- failure to demonstrate safe access,
- absence of drainage/FRA evidence,
- no BNG plan,
- no ALC survey,
- no assessment of school or healthcare capacity,
- conflict with CP11 and CP17,
- cumulative and disproportionate growth,
- and landscape/character harm.

I respectfully request that the application is refused. If the authority is not minded to refuse at this stage, then the application must be deferred until all missing mandatory assessments are provided.

Yours faithfully,  
Adrian Louth.