

PLANNING REF : 251310  
PROPERTY ADDRESS : Little Primrose  
: Church Road, Farley Hill  
: RG7 1TU  
SUBMITTED BY : Mr Phil & Davina McDonald  
DATE SUBMITTED : 22/06/2025

COMMENTS:

Reference: Planning Application 251310 - Request for an Environmental Screening Opinion for Residential Development - Land at Blackcroft Farm, West of Reading Road, Arborfield

Dear Sir/Madam,

We are writing as residents of Farley Hill to provide a formal objection on the EIA Screening Opinion request submitted by Rubix Land Ltd for the above application, 251310.

We note the applicant's assertion that the proposal constitutes 'Schedule 2' development under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. We strongly contest the applicant's subsequent conclusion that an Environmental Impact Assessment (EIA) is not required.

It is our firm position that the proposal is likely to have significant effects on the environment, and we formally request that the Council issue a positive Screening Opinion, confirming that an EIA is mandatory before this application can be determined. Our reasoning, based on the criteria outlined in Schedule 3 of the EIA Regulations, is as follows.

#### 1. Characteristics of the Development

The sheer scale of the proposal is substantial and represents a major urban development in a rural setting. The project includes:

- A total of 650 residential units, comprising 450 dwellings and a 200-home retirement village with a care home and leisure complex.
- An expansion of the Blackcroft Farm Industrial Estate.
- The construction of a new 4-arm roundabout on the A327 Reading Road.

This mass and scale are entirely out of keeping with the receiving environment of Farley Hill. Furthermore, the applicant's review fails to adequately consider the cumulative impact of this proposal. It will be built adjacent to the major, still-ongoing redevelopment of the Arborfield Garrison. The addition of traffic from 650 homes and expanded industrial use, combined with the existing pressures from the Arborfield Green development, will place an immense and unassessed cumulative strain on the local road network (A327), ecosystems, and community infrastructure. The applicant's own Transport Note acknowledges the need for future capacity testing, demonstrating that the current submission is insufficient to rule out significant

impacts.

## 2. Location of the Development & Environmental Sensitivity

We fundamentally challenge the applicant's assertion that the site "is not located within or in the immediate vicinity of a 'sensitive area'". This represents an overly narrow interpretation of the EIA Regulations. The environmental sensitivity of this specific location is exceptionally high:

- Ancient Woodland: The applicant's own reports confirm the site contains two areas of designated Ancient Woodland: Westwood Copse and Claypits Wood. These are also identified as Habitats of Principal

Importance. Ancient Woodland is an irreplaceable habitat, and its presence alone means the site is, by any reasonable definition, environmentally sensitive. The proposal to place major development in such immediate proximity risks fragmentation, pollution, and degradation which can only be assessed via an EIA.

- Proximity to Nationally and Internationally Important Sites: The applicant's own Preliminary Ecological Appraisal confirms the development site lies just 600m from the Thames Basin Heath Special Protection Area (SPA) and is located within the SSSI Impact Risk Zone for Bramshill SSSI. A development of this scale, so close to sites protected under international and national law for their vulnerable bird populations and heathland habitats, presents a clear and undeniable risk of significant effects from increased recreational pressure, water runoff, and urbanisation. A full EIA is the only appropriate mechanism to assess these risks.

- Valued and Rural Landscape: The applicant's own Landscape and Green Infrastructure Strategy references the 'Farley Hill Valued Landscape Assessment' and confirms the site lies within the 'Farley Hill Sand and Gravel Hills' Landscape Character Area, which is noted for its "secluded, remote character". This confirms that the landscape has a recognised sensitivity and value that would be fundamentally and irreversibly harmed by a development of this scale.

## 3. Characteristics of the Potential Impact

The applicant's preliminary reviews are insufficient to properly assess the magnitude, complexity, and permanence of the impacts.

- Magnitude and Complexity: The introduction of potentially over 1,500 new residents, a retirement village, and associated industrial traffic into a rural road network is a large-scale and complex event. The applicant's own traffic data shows the A327 is already a busy road, with a two-way AM peak hour flow of 1443 vehicles.

- Impact on Highway Safety for Vulnerable Road Users: The developer's own reports identify the local area as being characterised by "quiet rural lanes and tracks, some sunken, which

wind through the woodlands, bordered by bulky hedgerows and often without kerbs or intrusive signage". Their reports also identify "marginal land uses including pony paddocks with associated stables" as an existing feature of the landscape. These lanes are actively used by vulnerable road users, including numerous horse riders from several local equestrian establishments. The applicant's transport assessment confirms that key roads such as Church Road and Reading Road have 50mph speed limits and lack pavements. Injecting a high volume of new traffic from 650 homes onto these fast, narrow, and unlit rural lanes creates a severe and unacceptable safety risk for the equestrian community and other users. This significant impact on public safety has not been adequately assessed.

- Duration and Reversibility: The impacts of this development will be permanent and irreversible. It will fundamentally and forever alter the character of Farley Hill from a small, semi-rural village to a suburban extension of the main Arborfield development, eroding its distinctiveness and tranquil environment.

#### Misleading Application Title

Finally, we must point out that the application is consistently titled "Land at Blackcroft Farm... Arborfield". As a matter of fact, the proposed development site is not in Arborfield; it is in Farley Hill. This is misleading and undermines the transparency of the application process, with the potential for residents of Farley Hill to be insufficiently alerted to a major development on their doorstep.

#### Conclusion

Given the significant scale of the development, its location within and adjacent to highly sensitive environmental areas (including two Ancient Woodlands, the Impact Risk Zone of a SSSI, and close proximity to an SPA), and the high probability of significant, permanent, and cumulative impacts on the landscape, ecology, and local infrastructure, we believe the threshold for an EIA has been clearly met.

The applicant's own consultants identify the need for further investigations, including a shadow Habitats Regulations Assessment (SHRA), biodiversity net gain assessments, and further surveys for multiple protected species. This demonstrates that the current information is inadequate to conclude that there will be no significant environmental effects.

We therefore formally and strongly request that Wokingham Borough Council issue a positive Screening Opinion, confirming that a full and comprehensive Environmental Impact Assessment is required for application 251310 before it can be lawfully determined.

Yours faithfully,

Phil and Davina McDonald

