

PLANNING REF : 243114
PROPERTY ADDRESS : 27 Archer Grove
:
: RG2 9TB
SUBMITTED BY : Mr Darryl Tott
DATE SUBMITTED : 03/01/2025

COMMENTS:

I am writing to provide my feedback on the Environmental Impact Assessment (EIA) Scoping Opinion submission for the proposed development at Barkham Square by Crest Nicholson Operations Limited. While I welcome the preparation of an EIA to assess environmental impacts, I have significant concerns regarding the basis of the scoping report, the exclusion of key considerations, and the lack of alignment with community feedback and existing local plans.

1. Misalignment of Scoping Assessment with Consultation Feedback

The scoping document appears to have been prepared based solely on Crest Nicholson's current plans, with little or no consideration of community feedback gathered during consultation. The consultation period for Barkham Square was initiated on 4th December 2024, with the consultation website indicating on 3rd January 2025 that the planning application had already been submitted. I assume in relation to this scoping document received on 10th December and registered on 11th

December, 6 days after consultation! This undermines the purpose of the EIA, which is to ensure all potential environmental and community impacts are thoroughly assessed.

Examples:

- Access: The community has repeatedly suggested using the existing farm access off Commonfield Lane to minimize environmental disturbance and improve traffic management. This recommendation is not reflected in the scoping report. Instead, the plan continues to propose a new access point, which would disrupt existing trees and hedgerows unnecessarily.

- Allotments and SANG Car Park: The community has proposed relocating these facilities to the northeastern corner of the site (should they even be required), where they would have minimal ecological impact and better serve the community without compromising residential privacy or security. This was also disregarded in the scoping document.

Recommendation: The EIA should incorporate a comprehensive review of community-suggested alternatives and assess their environmental and social benefits against the current proposal.

2. Inadequate Consideration of the Southeastern Area as Greenspace in Perpetuity

The southeastern portion of the site, comprising approximately 24-25 hectares (60-61 acres), has been highlighted in the Local Plan's Sustainability Appraisal as suitable for designation as greenspace in perpetuity. This area exceeds the 40-acre threshold required for a country park designation and should be preserved for biodiversity and recreation.

Concerns:

- The scoping report's proposed allocation of only 18.63 hectares for SANG is insufficient and does not account for the southeastern area's full potential.
- The inclusion of allotments and a car park within the SANG undermines its purpose, as highlighted by community comparisons with Hazebrouck Meadow, which provides 14 hectares of uninterrupted greenspace without parking.

Recommendation: The EIA must assess the southeastern area's potential to meet the Local Plan's sustainability goals as a country park and evaluate the ecological and recreational benefits of preserving this space in its entirety.

3. Lack of Cumulative Impact Analysis with Adjacent Solar Farm

The adjacent 40-hectare solar farm development on Commonfield Lane will displace local wildlife, including deer that frequently inhabit the Barkham Square site. This cumulative impact has not been sufficiently addressed in the scoping report.

Recommendation: The EIA must evaluate the combined ecological impact of the solar farm and the Barkham Square development, including the displacement of wildlife and the need for enhanced biodiversity corridors.

4. Inadequate Alternatives Consideration

Under Schedule 4, Part 2 of the EIA Regulations, developers are required to assess reasonable alternatives, including site layouts and access strategies. The scoping report dismisses significant alternatives without robust justification:

- Access Strategies: The proposed access points do not consider the use of the existing farm entrance, which would reduce disruption and align with community feedback.
- Relocation of Facilities: The northeastern corner of the site is ideal for allotments and parking, minimizing environmental and residential impacts, yet this option is overlooked.

Recommendation: The EIA should assess alternative layouts, including those suggested by the community, and provide a detailed rationale for the chosen design.

5. Insufficient Assessment of Visual and Landscape Impacts

The scoping report discounts key visual impacts, such as views from Barkham Square and nearby public rights of way. The Discounted Viewpoints Report claims there will be no significant visual impacts, but this fails to account for potential seasonal changes in vegetation cover and longer-term effects on the character of the area. Recommendation: The EIA should reassess visual impacts, considering both year-round visibility and cumulative effects with the Arborfield Green development.

6. Transparency and Accountability in EIA Scoping

The scoping report lacks transparency in how it incorporates public and council feedback, raising concerns about the legitimacy of its conclusions. For example, mitigation measures for flooding, biodiversity loss, and traffic impacts are vaguely outlined without specific commitments or reference to community input.

Recommendation: The EIA must clearly document how community feedback and council policies are integrated into the assessment process and provide detailed mitigation strategies for all identified impacts.

7. Use of Commonfield Lane for Access

Using Commonfield Lane as a secondary vehicular access poses

significant traffic, noise, and visual challenges.

- Request: Conduct a Traffic Impact Assessment (TIA), noise studies, and reconsider using the existing Barkham Square access to preserve Commonfield Lane's rural character.

8. Climate Resilience and Net Zero Alignment

Limited measures addressing climate resilience and renewable energy are outlined in the scoping application.

- Request: Include renewable energy features, such as solar panels and EV charging stations, and explicit plans to mitigate flood risks and drought impacts, as required by NPPF 153.

9. Site Boundary and Eastern Protection

The distinction between the application and site boundaries (LPU) creates ambiguity regarding the future use of the eastern and southeastern portions, which are referenced as potential SANG but lack formal designation.

- Request: Formally designate the eastern and southeastern portions as permanent SANG or green space, aligning with Local Plan Policy NE3 and NPPF 174(b), safeguarding ecological corridors and green infrastructure.

Conclusion

The EIA scoping report must be revised to reflect a more comprehensive and balanced assessment of environmental, social, and cumulative impacts. Specifically, I urge the following:

1. Incorporate community feedback into access strategies, allotment placement, and SANG design.

2. Assess the southeastern area's potential as a country park and greenspace in perpetuity, in line with the Local Plan's sustainability goals.

3. Evaluate cumulative impacts with the adjacent solar farm and address wildlife displacement.

4. Reassess visual and landscape impacts with greater transparency and specificity.

5. Provide a robust analysis of reasonable alternatives and clearly justify the chosen layout.

Thank you for considering these comments.