

PLANNING REF : 252769
PROPERTY ADDRESS : Ellis Hill Hughes Green
: Arborfield
: RG2 9JF
SUBMITTED BY : Mr Matthew Conquer
DATE SUBMITTED : 19/11/2025

COMMENTS:

I am submitting this objection regarding the planning application by Gleeson Land Limited for up to 430 dwellings at Newlands Farm, Arborfield, forming part of the Loddon Valley Garden Village (LVGV). I strongly object to this proposal on legal, environmental, infrastructure, and procedural grounds, and I request that Wokingham Borough Council refuse the application.

My objection also relates directly to the parallel University of Reading LVGV hybrid application for 2,800 homes (Ref: 252498), which taken together with the Gleeson application creates a scale of cumulative impact that is not appropriately assessed, justified, or mitigated.

1. Failure to Properly Consider Cumulative Impact (Gleeson 430 + UoR 2,800 Homes)

The Gleeson Planning Statement states that the Newlands Farm proposal is closely related to the UoR's 2,800-home application and that the schemes will form part of a co-ordinated garden village. In reality, the two applications have been submitted separately, without a legally binding joint masterplan, binding infrastructure strategy, or guaranteed delivery sequencing.

This fragmentation is contrary to Policy SS13, which requires a single agreed vision and masterplan for LVGV, as well as the National Planning Policy Framework (NPPF) requirements for coherent and comprehensive strategic development.

2. Unsound Reliance on Emerging Local Plan (LPU) Policies

Gleeson repeatedly argues that its proposal fully accords with the emerging Local Plan Update (LPU) despite the LPU not yet being opted. This is a premature attempt to circumvent the established plan-making process.

3. Infrastructure Deficiencies and Unacceptable Transport Impacts

The development's transport assessment relies heavily on long-term assumptions and proposes road improvements phased up to 2032 or 2040. This results in significant concerns, including increased congestion, understated construction traffic impacts, and no coordinated highways strategy across the whole garden village, particularly with the 2,800-home UoR proposal.

4. Environmental, Landscape and Heritage Harm

The Environmental Statement itself acknowledges proximity to several listed buildings and sensitive landscape areas. Claims of mitigation are unsubstantiated. Concerns include loss of rural character, air quality impacts, wildlife corridor disruption, and unresolved

flood-risk issues.

5. Gleeson Land's Track Record - Caution Warranted

Gleeson references involvement in the Matthews Green Farm development. However, that project was delivered within an adopted SDL framework, with a completed masterplan, design code, and infrastructure plan. None of these safeguards exist for LVGV, meaning the applicant cannot rely on past performance to justify approval now.

6. Unsustainable Precedent Created by Approving Piecemeal Applications

Approving this standalone application risks predetermining the Local Plan examination, influencing adjacent land parcels without democratic approval, increasing infrastructure strain, and creating fragmented development lacking cohesion.

7. Legal Grounds for Refusal (Summary)

- Prematurity under NPPF paragraph 49
- Non-compliance with Policy SS13
- Failure to assess cumulative impacts with Application 252498 - Insufficient infrastructure guarantees
- Environmental harm contrary to NPPF Part 15
- Contradiction of the plan-led approach

8. Loss of Green Belt Land - Fundamentally Contrary to National Policy

Although the applicant seeks to downplay the significance of the land at Newlands Farm, the reality is that this location forms part of an essential Green Belt buffer between settlements and contributes heavily to the openness, rural character, and environmental setting of Arborfield. The NPPF is unequivocal: Green Belt boundaries must not be changed except in exceptional circumstances, and planning applications cannot be used as a mechanism to achieve such change by stealth.

Nothing presented by Gleeson Land constitutes "exceptional circumstances" as defined in NPPF paragraphs 140-148. Housing targets, deliverability pressures, or commercial interest do not meet the statutory test.

Approving this application would:

- * Undermine the permanence of the Green Belt
- * Create an irreversible precedent enabling further erosion
- * Remove open countryside that serves as a rural break between villages
- * Allow mass urbanisation of land currently serving a strategic function
- *Once this land is lost, it cannot be restored, contradicting the foundational principle of Green Belt policy.

9. Conflict With the Five Purposes of the Green Belt

The proposed development conflicts with every single statutory purpose of the Green Belt:

- * To check unrestricted sprawl - A 430-unit extension is the definition of sprawl.
- * To prevent neighbouring towns from merging - Arborfield, Sindlesham, and Winnersh would be visually and physically merged.
- * To safeguard the countryside from encroachment - The development is pure encroachment.
- * To preserve the setting of historic towns - Setting of listed buildings nearby would be diminished.
- * To assist urban regeneration - Encourages outward expansion instead of re-use of urban land.
- * No mitigation can offset such policy conflicts.

10. Misleading Positioning as "Garden Village" to Justify Green Belt Loss

The applicant repeatedly refers to the "Garden Village" concept as though it automatically legitimises development on sensitive land. However:

- * LVGV is not yet adopted;
- * Its deliverability is under active challenge;
- * Its boundaries, phasing, and infrastructure plan are not confirmed; * No adopted design code exists;
- * There is no binding legal governance framework across all landowners.

Until the Local Plan Update is adopted, this land remains protected countryside, and treating it as an allocated development site is legally flawed.

11. Combined Impact With Application 252498 is Catastrophic

The cumulative impact of:

430 homes (Gleeson) + 2800 homes (UoR LVGV application 252498) would create a new town of over 3,200 dwellings, without:

- * A completed transport plan
- * Confirmed funding
- * Guaranteed phasing
- * Verified utilities capacity
- * A viable schools and healthcare provision plan
- * Environmental mitigation proven at scale

The environmental footprint would be immense:

- * Increased air pollution from thousands of additional daily vehicle movements
- * Destruction of wildlife habitats
- * Massive loss of agricultural land
- * Increased water stress and sewage load

- * Loss of carbon sinks and green corridors

The ES submitted by Gleeson does not assess this combined scenario, meaning the application fails to meet EIA Regulations.

12. Severe Ecological Harm and Irreversible Biodiversity Loss

The site forms part of a wider ecological network linking:

The River Loddon corridor

- * Woodland patches
- * Open grazing and hedgerow networks
- * Bat foraging routes
- * Bird habitats
- * Amphibian and reptile movement corridors
- * Urbanisation at this scale destroys ecological continuity.

Claims that the scheme would create a "net gain" in biodiversity are unrealistic and unsupported by credible evidence. Net gain cannot be achieved when replacing open countryside with housing estates, roads, lighting, and hard landscaping.

13. Flood Risk and Water Management Failures

The site's hydrology is not fully understood, and downstream flood risk is a major concern. The applicant relies on modelling that fails to:

- * Address increased impermeable surfaces
- * Assess cumulative hydrological impact from the 2,800-home scheme next door
- * Provide a long-term maintenance plan for SUDS systems
- * Consider climate change projections for the next 50+ years

The River Loddon catchment is already sensitive. Adding this level of hard development will increase flood risk for:

- * Arborfield
- * Shinfield
- * Sindlesham
- * Winnersh
- * Lower Earley

Without iron-tight modelling, mitigation, and funding, approval would be reckless.

14. Air Quality and Public Health Implications

Adding thousands of cars into the area given both developments will:

- * Increase PM2.5 and NOx levels
- * Worsen congestion at known pinch points
- * Heighten health risks for children, the elderly, and vulnerable residents
- * Impact air quality around listed buildings and open rural spaces *
- Place further strain on already-overburdened local transport

corridors

The applicant provides no credible long-term air quality mitigation.

15. No Demonstrable Public Benefit

The NPPF requires that harm, especially Green Belt harm, be outweighed by clear public benefits.

But here:

- * Housing is already planned via the Local Plan process.
- * Infrastructure is unfunded.
- * Transport harm is unmitigated.
- * Environmental losses are severe.
- * Public amenity is diminished, not improved.
- * The scheme is premature in the context of the unadopted LPU.

There is no overriding need and no benefit that remotely outweighs the demonstrated harm.

CONCLUSION

This application must be refused because:

- * It results in unacceptable Green Belt loss.
- * It contradicts every Green Belt policy test.
- * It is premature pending the Local Plan Update examination. * It conflicts directly with Policy SS13, requiring one coordinated masterplan.
- * It fails to assess cumulative impacts with application 252498. * It causes severe environmental, ecological, landscape, and heritage harm.
- * It worsens traffic, air pollution, and flood risk without mitigation.
- * It sets a dangerous precedent that would unravel local planning control.
- * It provides no meaningful public benefit and cannot meet the NPPF balancing test.

The only lawful, rational, and policy-compliant decision is a full refusal