

PLANNING REF : 241567
PROPERTY ADDRESS : Broadlands
: 20 Cricket Hill, Finchampstead, Berkshire
: RG40 3TN
SUBMITTED BY : Mr Barry Gilmore
DATE SUBMITTED : 10/07/2024

COMMENTS:

Land of Longwater Lane, Finchampstead
On behalf of Mr B Gilmore of 20 Cricket Hill, Finchampstead.
We write in strong objection to the above referenced application by
Catesby Estates Ltd for the following reasons;

The Proposal is contrary to adopted planning policy;

Planning law requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise.

At a national level, the National Planning Policy Framework (NPPF) constitutes guidance which the Local Planning Authority (LPA) must have regard to.

In this case the development plans for the area are the Wokingham Borough Core Strategy 2010, the Managing Development Delivery Local Plan 2014 and the Finchampstead Neighbourhood Development Plan (FNDP) which was made as recently as September 2023.

These documents form part of the Borough's Development Plan and the plan period for all documents runs until 2026, with the FNDP policy extending to 2038

As a consequence, the broad policy approach will still be continued well beyond 2026.

The FNDP which was found to be 'sound' by the Government's Plan Examiner, and in accordance with Wokingham's development plans and national planning guidance, identifies several key policies in relation to this proposal.

Housing Need

Annexe D of the FNDP confirms that;

The Housing Need in Finchampstead in the period 2018 - 2036 is estimated to be 6424 additional houses each year and a total 1152 during the plan period

The need for Affordable Housing in Finchampstead in the period 2018-2036 is estimated to be 580 which is approximately 50% of the total

1,83027 houses in Finchampstead are scheduled to be built during the plan period including a proportion of Affordable Housing. This exceeds the identified need by nearly 60%.

In relation to need for housing within the wider borough, whilst the proposed developers might look to Wokingham's current housing land supply position to 'prey-in-aid of the proposal, the underlying reasons for the apparent shortfall in deliverable sites must also be clearly understood.

The substantive reason for such an identified shortfall is due to significant over delivery of housing in recent years. This has inevitably reduced the bank of planning permissions that remain and therefore the short-term deliverable housing land supply.

The shortfall is not a result of past under delivery, but past over delivery. Therefore, given this context, the weight to be attached to any benefits identified should be tempered depending on the scale, location and nature of the particular proposal being considered. Having established the tilted balance is 'tempered',

Paragraph 11d(ii) requires the proposals to be considered against the policies of the NPPF taken as a whole - including landscape and environmental protection policies and the three pillars of sustainable development.

Adopted Development Limits and Environmental and Landscape Protection At section 4.1 "Key issues for environmental sustainability" the FNDP requires that facilitating development must not result in a

biodiversity loss but achieve biodiversity net gain and as a priority must protect the parish's existing natural environment. It goes on to state that these matters need to be addressed in a sensitive and appropriate way if the current valued use and condition of the Parish is to be sustained, especially in relation to pressure for new residential development and supporting infrastructure, both inside and outside the area, which can adversely impact upon landscape character.

Policy AHD1 of the FNDP states that development proposals outside the Development Locations will only be supported where they are in accordance with National and Borough planning policies.

The Plan sets out a strategy which supports development within the Development Limit locations where they comply with other policies of the Managing Development Delivery Plan

New housing outside the amended Development Limits (as currently defined by Policy CP9 of the Core Strategy and cemented by policy CC0 2 of the MDD or as updated via the emerging LPU) will be supported only against very strict criteria as defined in the WBC Core Strategy Policy CP11, or successor policy, relating to Development in the Countryside.

Policy CP11 of the Core Strategy " Proposals outside Development Limits (including countryside) therefore applies which states that; In order to protect the separate identity of settlements and maintain the quality of the environment, proposals outside of development limits will not (normally*) be permitted".

*The submitted proposals do not comply with any of the 'exceptions' to this policy and do not meet any of the criteria which would allow a favourable consideration against this extant development plan policy. Keeping defined settlements apart by maintaining their visual and

physical separation to ensure that future development does not compromise their separate identities was highlighted as an important part of the FNDP vision. Subsequently, it was confirmed as a strategic finding of the FNDP Residents' Questionnaire (2019)

The application site lies in 'open countryside' outside of any settlement boundary and is not identified as an allocation site for future development in any adopted, draft or emerging development plan document.

Officer's attention, on this matter is drawn to the Council's own landscape officer's comments on Planning Application ref:171993 (for a similar proposal that was subsequently withdrawn) dated 25th August 2017 which stated in conclusion;

"Development adversely affects the countryside be it green field with trees and hedgerows or agricultural land, lakes or rivers, the rural perception is completely removed. In this case the settlement boundary will be pushed up against a new nature reserve and the intensification of use from residential development and human

activity will be contrary to the tranquil peaceful character of this landscape type. The NPPF states that the countryside should be recognised for its intrinsic character and beauty which in itself is providing a function. Land does not have to be accessed by people to make it valuable it just has to be there. In which case my assessment of the impact of development on the landscape character is not minor but major.

The Blackwater River Valley LCA is a landscape of high quality and strong character in which case the baseline assessment of medium is incorrect.

There are material and visual effects from the receptor groups as the views of open pasture will completely change to views of housing development which cannot accommodate improvement of the views through landscape enhancement which can only mitigate the change. The overall impact of development will have a major impact locally through loss of open countryside, extending the settlement edge and intensifying activity close to nature reserve.

The report concludes that 'the scheme represents a logical and easily assimilated development in this part of the countryside'..., however it is contrary to planning policy; it is not an allocated housing site and it is not in development limits, is not in keeping with the WDLCA which as a result is clearly unacceptable."

The proposal would represent a coalescence of Finchampstead and Eversley.

Policy IRS4 of the FNDP relates to implementing a strategy to preserve the identity of Finchampstead Parish through informal green spaces. As appropriate to their scale, nature and location development proposals should:

- Preserve the semi-rural look and feel of the Parish with its surrounding natural open environment.
- Preserve the distinctive character and appearance of the Parish countryside with varied landscapes and outstanding views.
- Preserve the topological features of the landscape that distinguish it as part of the Blackwater Valley and Thames Basin Heaths Special Protection Areas.
- Protect and where possible, enhance the green spaces of the Parish, both general and specific, through protected special areas, green gaps between settlements, green corridors, diverse flora and community spaces.
- Specify tree and hedgerow planting to reinforce and reflect local biodiversity in the Parish.
- Retain informal green gaps along the Parish access roads and other small areas of natural green space, as outlined in Annex S Rights of Way Network with adjoining Parishes.
- Retention and potential expansion of the green corridors through the extensive rights of way network and enclosure hedgerows to retain and enhance the outstanding views east, south and west within the Parish. Based on the above assessment, the proposals fail to preserve the

semi-rural look and feel of the Parish. Furthermore, it fails to preserve the distinctive character and appearance of the Parish countryside and would fail to retain or protect the green approach to the settlement boundary by encroaching development closer to it. The proposals therefore fail to comply with policy IRS4.

The proposed site does not relate well to the existing settlement but appears as a random and illogical southerly extension of the village at a 'gateway location' to the detriment of the natural and landscape value of this area.

It extends built form towards Eversley closing the gap between these two presently well-defined settlements.

This will give the impression of urban sprawl and will erode the existing rural buffer between the villages and materially harm the prevailing natural beauty of the countryside and rural characteristics of this edge of village location.

This is entirely contrary to the Council's Core Strategy vision for development within the borough which requires;

"Development proposals within the borough to have respected its character and built upon the attractiveness and features of the area thereby ensuring the sense of place is retained."

The site is entirely open to public views along the length the popular public footpath at its northern boundary and is an important and prominent countryside site enjoyed by the many users of this path. There is also soon to be another bridleway and footpath added to the Southern boundary as part of Cemex UK's restoration plan (ref LA.02) and nature reserve.

The proposed site should remain as a natural buffer between the existing village boundary built edge and the new country park for the protection it would offer both, and for the enjoyment and appreciation of the users of the existing and proposed footpaths that will remain well-used by dog walkers, ramblers and bird watchers.

The location has very poor sustainability credentials.

The adopted Core Strategy 'Vision' goes on to require that;

"Development will be concentrated in those towns and villages that either have a significant range of infrastructure including facilities and services now or will have them as a result of the development proposed through the Core Strategy. Development is less likely in locations where these facilities and services will not be available."

The application proposes no new infrastructure, facilities or services and lies in a location where many local facilities such as the village school and doctors surgeries cannot be further expanded. This would thus require unsustainable travel by car often for several miles. Officer's attention is drawn to the Parish Council comments in this connection to withdrawn application ref:171993 for a similar proposal wherein part of the Parish's objection stated;

"The three local primary schools are over-subscribed and children would have to be transported to other schools in the north of the parish, again by private car. The village has only limited shopping facilities. The doctor's surgery in Finchampstead is at capacity".

The applicants have previously suggested that for the site to be successful residents would need to have opportunities to work from home and travel in a green way. Considering that Wokingham has the second highest car ownership in the country and the national average for employees that work from home is 7.1%, this is not a realistic or a sustainable solution to make an unsustainable housing location acceptable.

There are very few opportunities for employment in Finchampstead meaning residents of the development would require the use of a private car to access employment opportunities as there is an almost non-existent public transport service available at this location.

The 145 bus passes the site once each way on a Tuesday only. There are no other buses that serve Longwater Road.

There are no cycle paths from the site.

The nearest train station is Crowthorne, which is 2 miles away along fast roads, some without pavements. Crowthorne station does not have a direct line to London and trains are infrequent. Similarly, all local services and supermarkets would require the use of a car due to this lack of public transport links. By way of example walking to the doctor's surgery (1.3 miles away) would be hazardous given the lack of suitable footpaths or pavements.

There is also only one local shop which has a limited offering of food as it operates as a garage shop / post office. The proposal is therefore also in conflict with policy CP1 of the Core Strategy which requires developments to demonstrate how they support opportunities for reducing the need to travel, particularly by private car in line with policy CP6; and how they contribute towards the goal of reaching zero-carbon developments.

The proposal would have an adverse impact upon important local wildlife habitats and flora and fauna and the adjacent proposed nature reserve

Policy CP3 of the Core Strategy also requires all development proposals to;

"Have no detrimental impact upon important ecological, heritage, landscape (including river valleys) or geological features or water courses and to maintain or enhance the ability of the site to support fauna and flora including protected species;

Local residents are fully aware of the on-site presence of many species of flora and fauna including slow worms, adders, grass snakes, red kites, woodpeckers, foxes, deer and bats (which have all been seen on the site and the immediate vicinity). This completely

contradicts the applicant's assertion that the site is of "low ecological value".

In fact, the impacts of the proposal would include the destruction of habitat, light pollution, noise pollution and car pollution.

The proposal would adversely affect the reasonable residential amenity enjoyed by adjacent and nearby residents.

Policy CP3 of the Core Strategy require all new / proposed developments to be;

".. of an appropriate scale of activity, mass, layout, built form, height, materials and character to the area together with a high quality of design without detriment to the amenities of adjoining land users including open spaces or occupiers and their quality of life;" There will however be a direct and detrimental impact to the privacy and amenity presently enjoyed by the occupiers of the houses on the southern end of Cricket Hill and Woodmoor.

These residents will have their quality of life adversely impacted by light pollution, noise pollution, car pollution and loss of outlook The area currently does not have street lighting and is dark at night, as is appropriate for such a rural area.

Impact of the development upon the Thames Basin SPA

The site lies within the 5km mitigation zone for impact upon the Thames Basin SPA. Any application would have to make provision for new SANG land or management contributions to off-set this impact.

No proposals are submitted to demonstrate how such can be delivered

The area is liable to flooding and this will be exacerbated by the

development

This area of the village is low lying, has a history of flooding and is of questionable ground stability (Woodmoor houses close to footpath do have surface wall cracks).

This would be exacerbated by the addition of new homes, driveways and new roads and paths and we would question whether either surface water run off and /or foul sewage can be satisfactorily dealt with here.

It is known locally that raw sewage has been discharged into the River Blackwater, a situation that cannot be allowed to be exacerbated by accommodating inappropriately site greenfield housing development with all the related discharges that this will entail.

The situation may be further compromised by the removal of the 'bund' between the site and the nature reserve to the south.

As an indicator of this issue it is understood that Cemex had underground pipes in the application site field which were tested once a week for water levels when they were excavating.

It is understood that Thames Water has reported there may not be capacity to accommodate a pumped connection to the site. Upgrade works will provide additional disruption and pollution to residents and

wildlife in the area. Thames Water have said they will "need to ascertain the scope of upgrade works". Therefore, there are no approved means of drainage.

There is a concern the development will impact the local water table and drainage, with the potential to induce subsidence in houses in the southern end of cricket hill and Wood Moor.

In addition, the site's proposed drainage pond sits directly above a "grassland for conservation interest" area shown in Cemex UK's restoration plan for the nature reserve site adjacent to the application site. This puts the conservation interest land at risk of flooding, posing a further risk to wildlife including ground nesting birds in the RSPB nature reserve which to the south of the site.

Longwater Road is a known accident and speeding 'blackspot'.

The added traffic using the proposed access to the site and new access would exacerbate this already dangerous situation.

There is a speeding problem on Longwater Road, evidenced by the Police frequently placing speed camera vans by the side of Woodmoor in an attempt to address this issue.

The speed signs show 30mph then 60mph then into 30mph once you arrive in Eversley. The entrance to the site would be on the verge to 30-60 mark.

With one of the highest average car ownership's in the Country the development here would potentially lead to another 64 car movements in any given hour, pulling out onto a road with a speed limit of 60mph yet there is no attempt in the application to mitigate the effects of the development on the road network for either residential or construction traffic.

This is a key B-road to connect traffic coming through Yateley, Eversley and Finchampstead with Wokingham.

The inevitable increase in car movements in given hour here will have a significant impact on the flow and safety of this road and nearby junctions - particularly as cars will be pulling out and waiting to turn in to the proposed site entrance.

For all of these reasons this proposal is unacceptable and not compliant with national or local planning policy and guidance and should therefore be resisted.