

PLANNING REF : 252498
PROPERTY ADDRESS : 27 Charlie Brown Road
: Burghfield Common, Berkshire
: RG7 3FB
SUBMITTED BY : Mr Ashley Lawson
DATE SUBMITTED : 12/09/2026

COMMENTS:

Dear Sir/Madam,

I am writing to register my formal objection to Planning Application 252498, concerning the proposed Loddon Valley Garden Village development at Hall Farm.

My objection is based entirely upon material planning considerations, including the adequacy of the Transport Assessment, highway capacity and safety, the credibility and phasing of sustainable transport provision, flood risk and drainage, wastewater infrastructure, ecological impacts, agricultural land, landscape character and the timely delivery of the infrastructure upon which the sustainability of the development depends.

I recognise the substantial housing and community infrastructure benefits proposed by the application. However, development on this scale should only be permitted where the applicant has demonstrated through robust evidence that its environmental and infrastructure impacts can be satisfactorily mitigated. In several important respects, that has not yet been demonstrated.

1. Highway impacts and significant deficiencies in the Transport Assessment

The transport implications are, in my view, the most substantial reason why planning permission should not presently be granted. This concern is now supported by the formal assessment undertaken by Reading Borough Council as neighbouring Highway Authority.

In its September 2026 report on Application 252498, Reading Borough Council resolved to object because:

insufficient information had been submitted to enable the highway, traffic and transportation implications to be fully assessed.

Its Highway Authority further concluded that the additional traffic likely to be generated would adversely affect the safety and flow of the existing road network.

More significantly, RBC's technical assessment identifies what it describes as deficiencies and inaccuracies in the applicant's calculation of trip generation, which it considers are likely to have significantly underestimated the effect of the development upon the surrounding highway network.

The figures reported by RBC are particularly concerning.

For the AM peak, its assessment identifies 4,245 total vehicle trips compared with 3,096 in the applicant's modelling a difference of 1,149 vehicle movements. RBC consequently concludes that the applicant has significantly underestimated the development's impact, particularly during the morning peak.

For a development of up to 2,800 homes within this application, forming the majority of a wider proposed Garden Village of approximately 3,930 homes, this is not a minor technical discrepancy. It goes directly to whether the transport consequences of the proposal have been reliably assessed.

This is especially important for:

Lower Earley Way;

the Meldreth Way junction;
Mill Lane;
the A327 corridor;
routes through Shinfield and Earley;
connections towards M4 Junction 11; and

the wider Reading highway network.

Earley Town Council has separately identified regular existing peak congestion on Lower Earley Way and has stated that it is not satisfied that the proposed highway improvements adequately mitigate transport impacts on this scale. It has also raised the risk of increased rat-running through residential roads when congestion or incidents occur on the wider network.

The current August 2026 National Planning Policy Framework is particularly relevant. Policy TR6 requires transport assessments to consider realistic future scenarios, including cumulative impacts and multimodal trip generation. It further states that development proposals should be refused where they would result in a severe adverse impact on the transport network in terms of capacity or congestion, including cumulative effects, or an unacceptable impact on highway safety.

Given the significant disagreement between the applicant's trip-generation assumptions and those of Reading Borough Council's Highway Authority, I do not consider the Council can presently be satisfied that the requirements of Policy TR6 have been met.

2. Reliance upon an insufficiently demonstrated shift from private cars to public transport

The proposal relies heavily upon reducing private-car use through increased use of buses, walking and cycling.

That principle is entirely desirable. However, the assumed modal shift must be demonstrably achievable rather than aspirational.

Reading Borough Council's detailed highway response raises serious questions about whether that is presently the case.

RBC notes that, within parts of Phase 1, only approximately half of dwellings would fall within the recommended 400m walking distance of a bus stop, and it identifies deficiencies in pedestrian access to the proposed stops.

It also notes that improved public-transport provision is heavily phased. Under the submitted strategy, Phase 2 would commence approximately six years after Phase 1, with the proposed new service towards Reading operating at only a 30-minute frequency and having an estimated 60-minute journey time between Wokingham and Reading. RBC further identifies that proposed highway mitigation at either end of the B3270 does not adequately provide bus priority, commenting that without such provision buses would simply sit within general traffic queues.

That creates an obvious planning difficulty.

If residents establish travel habits during the first years of occupation when public transport is relatively inconvenient, there is a material risk that private-car dependency becomes embedded before later sustainable transport infrastructure is delivered.

The current NPPF's Policy TR6 specifically requires Travel Plans to explain not only how sustainable transport objectives will be delivered and monitored but also to identify fallback options where the initial measures do not achieve their expected outcomes. The Council should therefore require a demonstrably deliverable public-transport strategy, including appropriate frequencies, journey times, bus priority, walking distances and occupation triggers, before relying upon substantial modal shift within the

highway
modelling.

Housing occupation should not substantially precede the transport infrastructure required to make those assumptions credible.

3. Network resilience and cumulative impact

The relevant planning consideration is not simply whether individual junctions can technically accommodate projected flows under normal circumstances.

The Council should consider the resilience of the wider network, including incidents on the M4, flooding, peak-period congestion and displacement of traffic onto residential routes.

Earley Town Council has specifically highlighted:

the role of Lower Earley Way as a diversion route when the M4 is closed;

existing peak-hour congestion;

the possibility of additional traffic using residential roads through Earley;

existing safety concerns at the Meldreth Way/Carshalton Way/Cutbush Lane junction; and

the effect of the proposed fourth arm at Meldreth Way upon existing traffic movements.

These are legitimate cumulative highway and highway-safety considerations.

Furthermore, Reading Borough Council has made clear that its concerns relate not just to Hall Farm in isolation but to the combined

implications of Hall Farm, Newlands Farm and the wider Garden Village masterplan.

The proposal should therefore be tested against realistic worst-case and reasonable-future scenarios rather than assuming optimum routing or idealised sustainable-travel behaviour.

4. Air-quality effects arising from additional traffic

The traffic issue also has a separate environmental dimension.

Reading Borough Council's Environmental Protection officers have advised that an assessment is required of the impact of additional traffic generated by the development upon Reading's Air Quality Management Area.

Indeed, the absence of adequate information regarding AQMA impacts forms part of RBC's formal objection to the current application.

This is particularly relevant if the development generates materially greater vehicle movements than assumed by the applicant.

Until those impacts have been properly assessed using credible trip-generation figures, the environmental consequences of the transport strategy cannot be considered fully understood.

5. Flood risk - River Loddon, Barkham Brook and cumulative catchment effects

The scale and location of the development require an especially precautionary approach to flood risk.

The site sits within the River Loddon catchment and includes areas where substantial flood-management engineering, Sustainable Drainage Systems and works associated with the River Loddon are proposed. The new August 2026 NPPF contains particularly clear national decision-making policies.

Policy F7 states that development proposals should not increase flood risk elsewhere and that development in areas known to be at risk

should be refused unless, amongst other things, residual risk can be safely managed and it can be demonstrated that flood risk elsewhere will not increase. Policy F8 requires Sustainable Drainage Systems appropriate to the nature and scale of the development and with long-term maintenance arrangements.

While considerable modelling appears to have been undertaken for the River Loddon, Earley Town Council has specifically questioned whether equivalent attention has been given to Barkham Brook.

It notes that Barkham Brook rises quickly following prolonged rainfall and that residents around Carters Hill are already vulnerable to

flooding. ETC therefore warns that changes in the behaviour of that catchment could have adverse effects.

This is important because the test is not simply whether the proposed houses themselves avoid the functional floodplain.

The correct planning question is whether the development, including:

- land raising;

- roads and bridges;

- drainage infrastructure;

- changes in impermeable area;

- alterations to existing watercourses;

- attenuation features; and

- cumulative changes to catchment behaviour

could increase flood risk elsewhere during the lifetime of the development, taking account of climate change.

The Council should therefore be satisfied that the Flood Risk Assessment fully addresses all relevant sources of flooding, including Barkham Brook and surface-water effects, and demonstrates that

existing communities will not experience greater flood risk as a result of development.

6. Wastewater and foul drainage capacity

Foul-water infrastructure is another material planning constraint which should be resolved before significant occupation occurs.

Earley Town Council's formal representation identifies foul-water drainage capacity as a significant constraint and states that it remains unclear whether required upgrades can be delivered in a timely manner consistent with the development programme.

ETC expressly requests that the necessary foul-water infrastructure be in place prior to development in order to prevent knock-on effects upon existing residents.

For a settlement of this size, this should not be left to an assumption that capacity will subsequently become available. The Council should require confirmation from the relevant statutory undertaker regarding:

- existing available network and treatment capacity;

- the precise reinforcement required;

- the funding mechanism;

- the delivery programme; and

enforceable occupation thresholds preventing development from exceeding available capacity.

Where infrastructure is necessary to make the development acceptable, it should be secured through appropriate conditions and/or a Section 106 agreement before the demand arises.

7. Infrastructure phasing and deliverability

The scale of infrastructure upon which this proposal depends is unusually substantial.

The application includes or relies upon:

a new bridge over the M4;

a new bridge across the River Loddon;

major highway connections;

internal spine roads;

sustainable-transport infrastructure;

two primary schools;

secondary education;

health and community facilities;

drainage infrastructure;

utilities upgrades; and

extensive green infrastructure.

These are not merely desirable enhancements. Many of them are essential to making the proposed settlement sustainable.

There is therefore a material risk if housing delivery advances more rapidly than the infrastructure required to support it.

This concern has also arisen through the independent examination of Wokingham's emerging Local Plan.

The Planning Inspectors initially raised detailed questions over LVGV's phasing, infrastructure cost assumptions and delivery.

Following the hearings, the Inspectors have not rejected the Garden Village allocation; however, their latest 4 August 2026 Post Hearings Letter expressly concludes that it was "unduly optimistic" to assume housing delivery at LVGV in 2027/28 and requires the assumed first 25 completions to be pushed back to 2028/29.

That finding should not be overstated, but it is relevant.

It demonstrates that even at Local Plan examination level the timing assumptions surrounding this highly infrastructure-dependent development have required adjustment.

Earley Town Council has separately expressed concern that the cumulative costs of onsite infrastructure, offsite highways works and community facilities could put pressure upon scheme viability and consequently upon the ability to deliver policy-compliant obligations in full.

Planning permission should therefore be contingent upon a clear and enforceable infrastructure phasing plan, with occupation triggers tied to completion of essential infrastructure rather than simply aspirational delivery dates.

8. Ancient woodland, veteran trees and other irreplaceable habitat

The ecological value of the site requires particular scrutiny.

Reading Borough Council's Natural Environment assessment confirms that there are multiple Tree Preservation Order trees, veteran trees and areas of ancient woodland on and around the application sites. The current NPPF provides an especially strong policy test.

National policy states that proposals resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and ancient or veteran trees, should be refused unless there are wholly exceptional reasons and a suitable compensation strategy exists.

Accordingly, a headline biodiversity-net-gain figure cannot in itself compensate for deterioration of an irreplaceable habitat.

The Council must consider both direct and indirect effects, including:

changes in drainage;
root disturbance;
lighting;
air pollution;
recreational pressure;
severance and fragmentation;
road infrastructure; and
long-term management.

I therefore request that the Council ensures that appropriate buffers, Arboricultural Method Statements and long-term management arrangements are secured before any permission is granted.

9. Best and Most Versatile agricultural land

The loss of productive agricultural land is also a material consideration.

Under the current NPPF, agricultural land quality should be taken into account when making land-use decisions, including whether land constitutes Best and Most Versatile agricultural land (Grades 1, 2 or 3a). National policy states that where significant development of agricultural land is necessary, poorer-quality land should be used where possible.

The Hall Farm development would permanently urbanise a substantial area of presently agricultural countryside.

The Council should therefore establish clearly:

the Agricultural Land Classification across the application site;
the area of Grades 1, 2 and 3a land that would be permanently lost;
whether alternative areas of lower-quality agricultural land have been appropriately considered; and
the cumulative agricultural-land loss associated with the entire LVGV development rather than merely Application 252498 in isolation. This irreversible loss should receive appropriate weight in the planning balance.

10. Landscape character, rural setting and the relationship between settlements

The proposal represents a fundamental alteration to a presently predominantly rural landscape.

Reading Borough Council's own description of the application area notes that it is primarily comprised of agricultural fields, with a surrounding landscape characterised by agricultural land, woodland and scattered rural development.

Earley Town Council has also raised concern that the quantity of proposed four- and five-storey development would introduce a notably urban character into this rural setting.

I recognise that the Planning Inspectors have recently concluded that Wokingham's proposed borough-wide "Valued Landscapes" policy was not adequately justified and should be deleted. I therefore do not rely upon that proposed designation as a ground of objection. Nevertheless, landscape character, visual effects, settlement pattern and the intrinsic character of the countryside remain legitimate material planning considerations.

The Council should therefore carefully assess whether the development retains a meaningful sense of physical and visual separation between existing communities, particularly Shinfield, Earley, Arborfield, Barkham and Winnersh, rather than creating the perception of a progressively continuous urban area.

Any green infrastructure proposed to maintain separation must function as a meaningful landscape feature and not merely as narrow landscaped corridors between built areas.

11. The application should be considered cumulatively with the wider

Garden Village

Application 252498 cannot sensibly be considered as though it were a standalone development.

Wokingham Borough Council identifies the emerging LVGV allocation as providing approximately 3,930 homes, while Application 252498 alone provides up to 2,800 homes. A further application at Newlands Farm proposes approximately 430 homes, with additional land forming the remainder of the strategic allocation.

Reading Borough Council's assessment specifically considers these applications in the context of the wider masterplan because their infrastructure and transport consequences are interconnected. The appropriate planning assessment must therefore consider cumulative effects upon:

the highway network;

public transport;

air quality;

schools;

healthcare;

wastewater infrastructure;

flood risk;

biodiversity;

landscape; and

existing neighbouring communities.

It would be inappropriate for the individual applications comprising LVGV to be assessed in a way which understates the consequences of the settlement when built out as a whole.

Conclusion

For the reasons above, I respectfully request that Planning Application 252498 be refused in its present form, or at the very least not determined favourably unless and until the outstanding technical matters have been satisfactorily resolved.

In particular, the Council should be satisfied through robust and independently scrutinised evidence that:

trip-generation figures accurately represent realistic development traffic and address the significant discrepancies identified by Reading Borough Council;

cumulative highway effects would not amount to a severe adverse

impact under NPPF Policy TR6;

public-transport provision required to support the claimed modal shift will be available at the appropriate stage of occupation and will provide a credible alternative to private-car use;

adequate fallback measures exist if the assumed modal shift is not achieved;

air-quality effects resulting from additional development traffic have been properly assessed;

flood risk from the River Loddon, Barkham Brook, surface water and other sources has been assessed cumulatively and will not increase flood risk elsewhere, in accordance with NPPF Policies F4-F8;

sufficient foul-water and wastewater capacity will be available before new homes create additional demand;

schools, health facilities, roads, public transport and other essential infrastructure are secured through enforceable phasing and occupation triggers;

ancient woodland, veteran trees and other irreplaceable habitats

will not suffer loss or deterioration contrary to national policy;

the permanent loss of Best and Most Versatile agricultural land has been properly quantified and weighed in the planning balance; and

the cumulative impact of the entire Loddon Valley Garden Village has been assessed rather than considering Application 252498 in

isolation.

The scale of the development means that errors in assumptions concerning traffic, transport behaviour, infrastructure delivery or flood management would have consequences extending far beyond the application boundary.

The fact that Reading Borough Council's Highway Authority has now identified potentially significant underestimation of vehicle generation makes it particularly important that these matters are resolved before planning permission is granted, rather than relying upon mitigation to be defined or corrected at a later stage.

For these reasons, I respectfully ask Wokingham Borough Council to give substantial weight to the above material planning considerations when determining Application 252498.

Yours faithfully,

Ashley Lawson