

PLANNING REF : 261059
PROPERTY ADDRESS : 31 Martingale Grove
:
: RG2 9HD
SUBMITTED BY : Mr George Vafeiadis
DATE SUBMITTED : 19/05/2026

COMMENTS:

I live in Arborfield Green and write to object to Planning Application 261059. I have reviewed the submitted documents in full, including the Planning Statement, Transport Assessment, Flood Risk Assessment, Health Impact Assessment, Statement of Community Involvement, Agricultural Land Assessment and Energy Statement. I am aware that Wokingham Borough Council has a 2.5-year housing land supply and that the NPPF tilted balance therefore applies. I am not objecting on the grounds that this site conflicts with countryside

protection policies. I accept that the weight of those policies is reduced in the current supply position. My objection is narrower and more specific than that. There are four areas where the evidence submitted is materially incomplete, and where the gaps cannot be deferred to Reserved Matters. Those are set out in Part A. Part B covers additional concerns that are genuine but carry less individual weight.

PART A GROUNDS REQUIRING RESOLUTION BEFORE DETERMINATION

1. Ancient Woodland Buffer Zone Incursions at Kidgham Copse

The site contains Ancient Woodland including Kidgham Copse. Natural England's standing advice on this point is not ambiguous: development within the 50-metre buffer zone should be refused regardless of the scale of the incursion. Ancient woodland cannot be replaced and no downstream mitigation changes that. What makes this particularly straightforward is that the applicant does not dispute it. The Planning Statement at paragraph 5.149 acknowledges incursions into the existing Ancient Woodland buffer zones, describing them only as "negligible in extent." Natural England's guidance does not work on a scale of negligible to significant. It says buffers should be maintained. The incursions are either there or they are not, and the applicant confirms they are.

An acknowledged buffer zone incursion is not something that can be tidied up at Reserved Matters. It goes to whether the current layout is acceptable in principle. Before this application is determined, the Council should require a revised layout that fully respects the 50-metre buffer at Kidgham Copse, along with written confirmation from Natural England that the revised scheme satisfies their standing advice. Without that, there is a real risk of consenting a scheme that cannot actually be built as shown.

2. Flood Risk Assessment Three Specific Failures

The Flood Risk Assessment (Arden, March 2026) has three problems that go beyond detailed design. Each one makes the flood risk case technically inadequate at outline stage.

The first is the hydraulic model. The applicant has located residential development in the western part of the site, away from the current flood zones along Barkham Brook. And the land use plan shows open space and SANG covering the eastern section where the brook and flood zones run. On the face of it this looks like a

reasonable approach. The problem is that the flood zone boundary determining

where residential land ends and open space begins was drawn using a model prepared by AECOM for the adjacent Arborfield Garrison site to the south, not for Barkham Square (FRA paragraph 4.6). That model tested only the central 14% and higher central 23% climate change allowances (FRA paragraph 4.7). Under the 70% upper end allowance appropriate for a residential development with an 80-year design life, the flood extent along Barkham Brook could expand westward into what is currently shown as residential development. That scenario has not been assessed. The boundary between developable land and open space

has been drawn using the minimum available climate scenario, on a model calibrated for a different site. That is not a sufficient basis for defining which parcels can be built on.

The second is the climate change allowance. The FRA uses the central 14% river flow uplift for the Loddon catchment. Planning Practice Guidance makes clear that higher allowances are available the upper end figure for the 2080s is 70%. A residential development that will be standing in 80 years should be assessed against that figure, not the minimum. Using the lowest available number for the longest-lived type of development is indefensible.

The third is the pump station. Foul drainage from the site requires a pump station installed beneath Barkham Brook to connect to sewers on the east side of the site. If the pump fails, sewage backs up into the development. There is no mention of backup power, no contingency drainage arrangement, and no reference to the Environment Agency's position. This is not a design detail it is a fundamental question about whether the drainage strategy works at all.

The Council should require a revised Flood Risk Assessment prepared specifically for this site, using the 70% upper end climate change allowance, with a fully described surface water drainage strategy and a documented contingency and backup power solution for the pump station signed off by the Lead Local Flood Authority and Thames Water before this application comes back for determination.

3. School Capacity Farley Hill Is Already Full

The Planning Statement cites Farley Hill Primary School, 320 metres from the site, as a key educational facility serving the proposed development. The published Wokingham admissions data for 2025 makes the reality of that claim very clear.

In the 2025 primary admissions round, Farley Hill received 138 applications for 60 places oversubscribed by 130%. Every single place was filled. Not one place went to a child outside the designated catchment area. The furthest distance at which a child was admitted was 0.679 km. The Barkham Square development site starts at

approximately 0.50 km from Farley Hill but extends to over 1.01 km away. This means the majority of the 660 homes proposed will be beyond the distance at which admissions were cut off in 2025. The Planning Statement's reference to Farley Hill being 320 metres from the site refers to the nearest point of the site boundary not where most of the homes will be built. Most future residents of Barkham Square would not qualify for a place at Farley Hill on distance grounds under the current admissions criteria.

Existing residents of the Arborfield Green development (which is still completing) are already unable to get places at Farley Hill. Families are making car journeys of up to 10 miles each way because no local places are available. This is happening now, with the SDL only partially built out. The applicant has cited a school without a

single spare place, and the admissions data proves it. The Planning Obligations Statement says a new two-form entry primary school will be delivered "elsewhere in Arborfield Green." There is no identified site, no funding mechanism, no delivery trigger, and no legally binding commitment in the Heads of Terms. Adding 660 households into a catchment already failing its residents, on the basis of a school with no site and no trigger, is not acceptable. The Council should secure from the applicant, within the Section 106 agreement and before any permission is issued: a firm identified site for the new school, a delivery mechanism, and a legally binding occupation trigger. Not a promise to sort it later.

4. Healthcare No Engagement With NHS, No S106 Contribution
The Health Impact Assessment (Rapleys, April 2026) was prepared by the same consultancy that wrote the Planning Statement. It acknowledges that the average number of patients per GP practice in the NHS BOB

Integrated Care Board area is 3,250, against a HUDU benchmark of 1,800. It notes that GP practices may already be under pressure. These are the consultant's own words in the applicant's own document.

I can confirm from living here that this is accurate. GP practices in this area are full. NHS dentistry has effectively stopped accepting

new patients there are waiting lists and no new registrations. The situation is not marginal; it is a real problem for residents today. And yet the HIA itself states it "does not explicitly reference engagement with NHS bodies or provide evidence of consultation regarding healthcare infrastructure." There is also no healthcare contribution of any kind in the Section 106 Heads of Terms.

The application includes elderly care accommodation as a specific component. The Finchampstead Surgery is cited as being within cycling distance it is a 20-minute cycle for a reasonably fit adult. That is not accessible provision for elderly residents, and it is the kind of claim that suggests the applicant has not thought seriously about the care population this development is supposed to serve.

Before this application is determined, the Council should require a revised Health Impact Assessment produced through genuine engagement with NHS England and the ICB, and a specific, quantified healthcare S106 contribution confirmed in the Heads of Terms. Not a general commitment. A figure.

PART B ADDITIONAL MATERIAL CONSIDERATIONS

The following points are genuine concerns but I do not put them at the same level as Part A. They are material considerations the Council should weigh.

5. Transport Undelivered Assumptions and Outdated Data

The Transport Assessment claims a 10% reduction in trip rates based on future bus service improvements that do not yet exist. The assessment itself acknowledges at paragraph 4.3.20 that the Leopard 3 bus service may not actually run through the site as planned. You cannot apply a trip reduction to a bus service that might not be routed there.

The underlying mode share data comes from the 2011 Census. That is fifteen years ago. It records 78% of local trips by car, predating the substantial growth of car-dependent suburban development in this area since then. The real figure today is almost certainly higher. All traffic from the development is routed through a single new roundabout on Langley Common Road with no vehicle link to Arborfield

Green. The cumulative impact of this development on Langley Common Road on top of the existing and still-completing Arborfield Green SDL deserves independent assessment, not a model built on 2011 data.

6. Loss of Agricultural Land and Wildlife Habitat

The Agricultural Land Assessment confirms 23.3 hectares of Grade 2 and Subgrade 3a Best and Most Versatile land would be permanently lost. The applicant argues this is acceptable because current productivity is low, at under 15,000 a year. The assessment itself explains the reason: fragmented ownership and weak local agricultural management. The land is not poor quality. It has simply not been properly farmed. Measuring national food security value against the current landowner's rental income is the wrong test. I would also note, as a local resident, that this land is active wildlife habitat. Roe deer use it regularly. A fawn was born on the site this week. None of these features in the applicant's characterisation of the land as low-value grazing with minimal ecological interest.

7. Settlement Coalescence with Barkham Village

Policy IRS1 of the Neighbourhood Plan requires development not to lead to the perceived coalescence of existing settlements. The gap between Arborfield Green and Barkham Village is already under pressure.

Building 660 homes on the northern edge of the existing SDL will close that gap further. The applicant's own Landscape and Visual Impact Assessment acknowledges that effects on Langley Common Road will remain "Long Term Moderate Adverse" even after the development is established. A managed SANG along the Brook is not the same as open countryside. Once this gap closes, it does not reopen.

8. Community Consultation

The single public exhibition was held on 4 December 2024 a Wednesday afternoon, less than three weeks before Christmas and attracted 43 people from 3,188 notified households. That is 1.3%. Where

respondents raised concerns about infrastructure and schools, the applicant's response was that these "can be properly managed at a later stage." Inadequate pre-application consultation is not by itself a ground for refusal. But the Council should be under no illusion that the community has been meaningfully consulted on a scheme of this scale. The numbers confirm it has not.

9. Conflict with the Development Plan

The application conflicts with Policy CP11, Policy CC02, and Neighbourhood Plan Policies IRS1 and IRS2. The applicant acknowledges this. Given the Council's housing land supply position, I accept these policies carry reduced weight in the tilted balance and I am not

asking for refusal on this basis alone. But the conflicts are real and they are a further material consideration to place alongside the infrastructure failures in Part A.

Conclusion

Four of the issues in this objection are not matters of opinion or planning judgment. The flood risk case uses a model built for a different site and the minimum climate change allowance for a development with an 80-year lifespan. The Ancient Woodland buffer incursions are acknowledged by the applicant and not permitted under Natural England's guidance. The school this development relies on is already full, and the replacement has no site, no trigger and no

legal commitment. The healthcare assessment was produced without engaging NHS bodies and there is no S106 contribution.

The remaining points 15-year-old transport data, 23 hectares of permanent BMV land loss, closing the gap with Barkham Village, a 1.3% consultation response rate are all real and should be weighed.

My request is straightforward: defer this application and require the applicant to provide a site-specific flood risk assessment using the 70% upper end climate change allowance; a revised layout with Natural England sign-off on the Ancient Woodland buffers; a firm school commitment with an identified site, delivery mechanism and S106 trigger; and a quantified healthcare contribution agreed with the ICB. None of these are unreasonable asks for a development of 660 homes. They should have been in the submission already.