

**COMMENTS ON THE 'PLANNING STATEMENT' BY 'WOLF BOND PLANNING' RE A
NEW DEVELOPMENT IN WAINGELS ROAD, CHARVIL
Application No.: 250407**

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Preface

As one would expect, the 'Planning Statement' drafted by Wolf Bond Planning is certainly very carefully worded, to present its arguments in the best possible light. However, there are numerous 'statements' within it which are either extremely 'carefully worded', or which are simply inaccurate (i.e. untrue!). There is not sufficient space here to counter each and every 'inaccuracy', and hence only the more outlandish or untrue have been addressed here; and in the same order as they appear in the Wolf Bond document.

SPECIFIC COMMENTS ON THE WOLF BOND DOCUMENT

Section 2: Site Description

Para 2.5 states that:

"... the scheme will be seen in the context of this development which means that the site does not result in urban expansion but rather logical infill". This would appear to conclude that the existing 8 houses (behind which the development would sit) can be 'infilled' by an additional 9 more! That is not "infill", it is more than doubling the number of houses! It is also not 'infill' as the additional houses would be in a completely new building line. A better view of this proposed site, can be seen in the image entitled "Illustrative Wider Context" on WBC's Planning website.

Section 2.9 (and 2.12) states that:

"The nearest bus stop is located on Tippings Lane approximately a ten/fifteen minute walk from the site.". However, what it fails to mention is that buses come at only 'two-per-hour' and nobody in Waingels Road ever uses them; everyone uses their cars. Access to these infrequent buses is via a narrow country footpath, which is very poorly lit in the evenings/night. The final paragraph of Section 2.9 is therefore wholly misleading. Charvil has only one small shop (which is over a mile's walk from Waingels Road), and Woodley is even further.

Section 3

The final wording of Para 3.5 states that the development "logically responds to the surrounding pattern of development". This is 'waffle' and is simply untrue. Para 4.5 also states that "The gross density of 10 dwellings per hectare is fully commensurate with the character of the area". This again is simply untrue. It would be very significantly more dense than the surrounding area.

- a) Current houses are on 0.5-1.5 acre plots; whereas this proposal would put 9 houses on 2.47 acres minus the road, so on <0.2 acre plots, and hence absolutely not 'in keeping' as stated by Woolf Bond Planning.
- b) There is currently no mains drainage in Waingels Road (all houses are on septic tanks). How will these nine houses impact the environment with 'Septic Tank soak-aways' immediately adjacent to the lake in Ashenbury Park? (see also the Section headed 'Contamination' on the final page below).
- c) Re road safety; all current houses have clear sight-lines onto the road when driving out. However, the single exit for all nine of the proposed new houses will join Waingels Road on a blind bend.

- d) Will emergency services be able to access the development through the small single track passageway? Has this been checked?

Section 4.5

This section attempts to claim that the proposed development conforms to the various CP3 requirements; most significantly as regards the density of the proposed housing. As noted above, current Waingels Road housing is on plots of between 0.5 to 1.5 acres. The proposed development would put nine houses, plus the access road, on a 2.47 acre site (i.e. nine 0.2 acre sites - see above). Hence not as stated by Wolf Bond "Fully commensurate with the character of the area"! There are no houses in Waingels Road with plots this small!

The remainder of Section 4 continues (at great length) to attempt to 'justify the unjustifiable' (biodiversity, housing supply elsewhere, not within a 'valued landscape' etc.); however, no matter how you look at this, such a development is essentially an 'unjustifiable proposal'.

Section 6 (6.1-6.9)

Looking at the Wolf Bond wording in their Sections 6.1-6.8, there is a very clear attempt to 'Muddy the Waters' of the rules. We would argue that it is indeed a 'Major Development' in the context of the locality (it would more than double the number of houses which they would sit behind, and they are certainly not 'in keeping' with the locality), hence we do not believe that "Permission in Principle" (PIP) should be granted in this case. There are certainly 'Material Considerations' to indicate otherwise, despite Wolf Bond attempting to imply otherwise. The current plan would be very clear 'Over Development' of the site and be completely inconsistent with the locality.

With regard to Wolf Bond's assertions in Paragraph 6.9, these do warrant some significant 'clarification'.

- i) Yes the development is indeed 'Outside the village settlement boundary' and indeed would not normally be supported. However, Wolf Bond then goes on to try to justify why this should not be the case here; however, their 'justifications' are tenuous to say the least.
- ii) They claim that "Council have approved applications in the countryside designation within the immediate vicinity". While this may be factually correct; what they omit to mention is that two of these 'approvals' were actually "demolish and rebuild" of single old houses on 1.5 acre plots, and the third was a single newbuild on a 1.5 acre plot (i.e. very much 'in-keeping'), and with clear access directly onto Waingels Road.

To attempt to use these "in-keeping re-builds" as justification for PIP for nine new houses on significantly smaller plots, and with poor access to Waingels Road, is frankly stretching credibility to breaking point. Finally, in who's opinion has the policy "long since stopped being appropriate ..."? Is this actually WBC's opinion, or just Wolf Bond's?

Section 6.10

This paragraph states that: "... *it is considered that the nature of the development proposed is appropriate for its context*". One has to ask "Considered by who?". The proposed development is for nine houses on plots less than 20% of the size of all other nearby houses! In no way can that be considered as "appropriate for its context".

Section 6.15

This Paragraph again attempts to convince the reader that the proposed development is “*considered to be compatible with the character of the surrounding area*” and “... *a logical infill in the established pattern of development along Waingels Road*”. However, just writing it down doesn’t make it true; which it certainly isn’t!

As noted a number of times above, neither of these statements can bear the least amount of scrutiny. Ten minutes walking along Waingels Road will be sufficient to demonstrate this.

Finally in this paragraph, it states that “*In relation to access, the width, capacity and visibility available are to be considered at the technical details consent stage*”. CPC would argue that, as these issues are also paramount to the request for PIP (from a road safety and access standpoint), they must most certainly be considered upfront and before any PIP.

Sections 6.18, 6.19 & 6.20

These sections again attempt to persuade the reader that there is easily available public transport (which there simply isn’t). This has already been addressed above. In Waingels Road, everybody uses a car.

Section 6.22 & 6.23

Section 6.22 states that there are “further homes in all directions”. While this may be ‘theoretically accurate’, it is in practice untrue and intentionally misleading. To the north are the school playing fields and Sonning Golf course; there are no homes to the East for at least a mile; to the South is only Ashenbury Lake and Ashenbury park; and there are no homes to the west until you reach Woodley! (see again in the document “Illustrative Wider Context” on WBC’s website).

Section 6.23 is, again, simply untrue! It states that the site is “surrounded by residential development”. These two paragraphs are very good examples of where this ‘Application for PIP’ is both inaccurate and attempts (in numerous places) to convince the reader that black is white. **This issue alone should be enough for WBC to look very carefully at all these details (and visit the site) before permitting any PIP.**

Section 6.24 & 6.25

Simply keeping-on saying it, doesn’t make it true! The site is not acceptable for PIP, it is not a sustainable location, and it is certainly not “Surrounded by existing residential development” (see above).

The proposed arrangement is:

- totally at odds with the established neighboring development;
- it is demonstrably not “in keeping with the established pattern and building line”;
- it could not ever “become part of the established pattern and building line”;
- to say that “they would assimilate into the existing pattern” is clearly nonsense;
- and frankly, averaging the current ‘~1-house-per-acre’ with the proposed ‘1 house per 0.2 acres’, and coming-up with a theoretical ‘average’ is mathematical nonsense.

Section 6.27

As already discussed above (and to be polite), this paragraph is simply untrue.

Section 6.28

This paragraph attempts to convince the reader that all the inaccuracies and presumptions listed in the previous paragraphs are true and have been accepted! Unfortunately, these conclusions are based on very little 'fact' and the fervent hope that WBC does not actually visit the site! There can be no reliable "presumption in favour" based on the statements provided within the Wolf Bond planning application.

Section 6.25 (and elsewhere)

As noted in numerous paragraphs above, no matter how many times the 'Application for PIP' states that it is "in keeping with the character and appearance of the surroundings", the fact remains that, demonstrably, it is not!

Section 7.2

This paragraph, yet again, attempts to convince the reader that, despite all the evidence to the contrary, somehow "The scheme would respect and assimilate into the existing built form and building line ..." (despite the fact that it would actually start a whole new 'building line!').

Section 7.3

This paragraph attempts to assert that, because of all the previous arguments and statements, the application for PIP should be approved. However, it fails to address the fact that a very large proportion of these earlier 'arguments and statements' are wholly incorrect (see above). There is therefore no justification for the statement that "the location of housing is outweighed by the benefits of the scheme".

CONTAMINATION

While (unsurprisingly) not addressed within the Wolf Bond 'Planning Statement', the proposed site is wholly 'reclaimed land' which was previously part of the much larger 1940/50s Gravel Pit (of which Ashenbury Park is also a part). Attached is a copy of the 1947 6" OS map which clearly shows this. Councilors may be aware of a 2018 issue where the Environment Agency required a sign and fence to be erected in Beggars Hill Lane, where contaminated water was seeping from this same overall Ashenbury Park landfill area. The question therefore has to be asked; while having an open country park on contaminated reclaimed land may be acceptable; should we really be building new long-term homes on such a site?

We must therefore ask: "What work has been undertaken to determine what potentially toxic substances were deposited in that Landfill? And can we be certain that the same leachate that came from other parts of this landfill site in 2018, are not also present in this proposed part of the site? This question is particularly relevant, given that there is currently no 'mains sewer' in Waingels Road, and hence these nine closely packed houses would all need to be served by Septic Tanks with associated 'soak-aways'. Immediately adjacent to (and downhill from) the proposed site (where this foul water would obviously flow) is currently Ashenbury Lake!

CONCLUSION

Finally, and in addition to all the above concerns; it is clear that this proposed site was not in WBC's most recent plan; which therefore obviously shows that it was not then deemed suitable. Hence, if it was not deemed suitable then, what has changed such that it is deemed suitable now?

In Charvil village there are a further 75 houses currently planned under the Hicks development, which is well-planned and in-keeping. There are also two very significant new developments

planned near Twyford on the A4 (on the edge of Charvil). These developments will come with all necessary infrastructure and will then be well served and in-keeping with their surroundings; this is in stark contrast to the nine houses proposed here for Waingels Road by Wolf Bond Planning.

SUMMARY COMMENTS ON WOOLF BOND'S 'PLANNING STATEMENT

There are 37 pages of 'information' within the Woolf Bond Planning Statement. However, very little of it can be taken at face value! If ever there was a document which attempts to convince the reader that Black is White, then this is that document!

Provided above is a 4-page analysis of some of the most 'controversial' claims within the Woolf Bond Statement; and below is a brief summary of the worst 'excesses' within that document.

The Woolf Bond Planning Statement attempts to imply that the construction of these nine new houses would somehow be 'infilling' the existing eight houses and would be 'in-keeping'. This is despite the fact that:

- i) they would sit in a completely different 'building line' behind the existing houses;
- ii) and would sit on plots approximately one fifth of the size of the existing plots!

Hence this 'in keeping' claim is clearly nonsense and is simply designed to provide a very tenuous justification for the planning application. While there are numerous other spurious claims within the Woolf Bond document (which have been addressed within the earlier 'Comments'), the key issues can be summarized as follows:

- a) they propose nine new houses on ~0.2 acre plots, to sit in a new 'building line' behind the eight existing houses which are on ~1-acre plots. This is neither 'infilling' nor 'in-keeping'.
- b) They state that: *"the plot is sufficient in size with enough land to accommodate the erection of 9 dwellings in keeping with the character and appearance of the surroundings. The ability of respect the existing pattern and built form of development surrounding the site is illustrated on the illustrative Layout Plans"*.

In what possible way can "9 new houses on 0.2 acre plots and sitting in a completely new 'building line', be 'in-keeping' with the existing 8 houses (to the immediate north) which are on ~1 acre plots?

Finally, absolutely no mention has been made within the Wolf Bond document of the fact that the site is on reclaimed and potentially contaminated land. Similarly, there is no mention of any work which has been undertaken to determine what level of contamination there may be, although we do know that other parts of the Ashenbury Park 'reclaimed area' have seeped contaminated water as recently as 2018. Finally, there is no mention of how 'foul water' from these new houses will be disposed of, given that all other houses on Waingels Road have soakaways for their waste water.

Summary

This application is a rather transparent attempt to justify the unjustifiable. The proposal is neither 'in-keeping' nor practical. We do not believe that it should be awarded PIP.

Attachment:

1947 6" OS map of the site area.

1947 6" OS Map.

