

To the planning officer/s in charge of application 260577,

I am writing as a local resident to formally object to the retrospective planning application (Ref: 260577) for the change of use of land to a Gypsy/Traveller site at the Land South of Valois, Range Road, Finchampstead, RG40 3NR. My objections are grounded in planning policy, environmental law, procedural deficiencies and road safety concerns. This is an extraordinarily weak planning application and should be rejected for the reasons outlined in this letter. This letter can/should be read alongside my letter for the adjacent site (260439).

1. Retrospective Nature and Intentional Unauthorised Development

This application is retrospective. The applicants own form confirms that the works both started and “completed” on the 6th of March, the very day the application was submitted. Residents can all attest that work began at approximately 6pm on Friday the 6th of March, when both trees were felled (on the lane itself), heavy machinery brought (down the lane) damaging the verges of the lane with additional and unnecessary scraping of the land. Not only this - plot was tarmacked overnight with caravans brought onto the site. The timing and manner of the works strongly suggest a deliberate strategy to present the Council with a fait accompli. In the following days and weeks, hard standing units were attempted to be moved down the lane (and allegedly an unauthorised septic tank).

Paragraph 4(f) of the Planning Policy for Traveller Sites (PPTS, December 2024) states “that plan-making and decision-taking should aim to reduce the number of unauthorised developments”. Granting retrospective planning here would directly undermine that national objective and would likely send a signal that unauthorised development on countryside land bears no consequence.

Paragraph 135 of The National Planning Policy Framework states that developments “are sympathetic to local character and history, including the surrounding built environment and landscape setting”. I would argue that carrying out such major works under the cover of darkness, with no prior engagement with the local community demonstrates a complete and utter disregard for the existing communities’ interests. As such, I would also argue that the Paragraph 3 of the PPTS has not been respected whatsoever here - “The government’s overarching aim is to ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community.”

2. Conflict with the Development Plan

The site lies within the countryside, outside all settlement boundaries as defined in the 2010 Wokingham Core Strategy, the 2014 Managing Development Delivery DPD, The Finchampstead Neighbourhood Development Plan (2022-2038), and the 2025 Drafted Local Plan Update. None of these plans allocate this site for Gypsy/Traveller use, or any other residential development.

Policy H of the PPTS (paragraph 26) states that “planning authorities should very strictly limit new traveller site development in open countryside that is away from existing settlements or outside areas allocated in the development plan”. The planning agents Design and Access Statement concedes that the site is accessed from Range Road and is characterised by woodland and countryside. This is precisely the type of unallocated, open countryside land that the PPTS instructs should be very strictly limited.

3. Inadequacy of the Planning Statement

The applicant’s planning statement is only four paragraphs long. It asserts that the “tilted balance” is engaged, that there is “no good reason” to reduce, and makes the extraordinary claim that Natural England is seeking to 'sabotage' the NPPF through 'tampering with inventories' - an assertion made without evidence. This is not a credible or professional planning submission. It provides no assessment of landscape harm, no analysis of policy adherence, no consideration of residential amenity, and no biodiversity evidence whatsoever.

4. The “Tilted Balance” Does Not Override all Harm

Even if Wokingham Borough Council cannot currently demonstrate a five-year supply of deliverable Gypsy/Traveller sites (which engages NPPF paragraph 11(d)), the tilted balance does not provide a blanket approval for any site anywhere. The test remains whether the adverse impacts for granting permission would significantly and demonstrably outweigh the benefits. For the reasons set out in this objection letter, the harm is substantial and demonstrable, and as such, the planning balance falls firmly against approval.

Further, the Secretary of State and Planning Inspectorate have consistently held that the specific policies in PPTS Policy H remain the controlling framework for determining traveller site applications, and that the tilted balance does not displace the strict limitation on open countryside development set out at paragraph 26.

5. Sustainability and Accessibility

The agent's own Access to Service report, (by Rotam Consulting, authored by Henry Hardwicke Carruthers) undermines the sustainability case. It records walking times of 17-23 minutes to basic shops and schools, whilst the nearest secondary school is a 56-minute walk (or 28-minute public transport journey). Being an unlit rural single-lane track, Range Road has no footpath or cycling infrastructure suitable, meaning vehicular access would be the opted choice. Pedestrians, including children would be forced to walk along this lane in darkness to reach the bus stop, which itself is a fast B-Road.

PPTS Policy B (paragraph 13) requires that Gypsy/Traveller "traveller sites are sustainable economically, socially and environmentally" and that they can "ensure that children can attend school on a regular basis". The absence of safe pedestrian access to any local services renders this site unsustainable for residential use.

6. Road Safety and Substandard Junction

Range Road is a narrow, single-track rural lane that is structurally unsuitable for movement of large vehicles, caravans and static caravans. The applicant's own "crash map" submission shows that 166 recorded incidents in the local area, including fatal and serious collisions on Nine Mile Ride (B3430).

I would like to draw the planning officer's attention to the planning history of this area (Ref: F/2006/8196), in which the junction of Range Road and B3430 Nine Mile Ride was deemed substandard and a risk to road safety. This situation remains largely



Figures 1 and 2: Delivery of an unauthorised static caravan that was too large to fit down Range Road. Traffic hazard outlined by the white VW Golf having to move out across the centre lane. *Photos taken 10th of March 2026.*

unresolved. The retrospective development has already caused visible damage to Range Road from the movement of heavy machinery and static caravans. Additionally, attempts have been made by the applicant to bring in static caravans that were simply too large for the lane, evidencing both points I have made above. Evidence for this and the damage to the lane are seen below in **Figures 1-4**.



Figures 3 and 4: Damage made to Range Road whilst trying to move large, unauthorised static homes and machinery. The verges and tree detritus were dug up and piled against the west-fence line of 297 Nine Mile Ride **(3)** and concrete verge supports thrown aside (east-fence line of Range House **(4)**). *Photos taken 13th of March 2026.*

7. Absence of Biodiversity Net Gain (BNG) Assessment

The applicant has claimed in the application that BNG does not apply because (a) this is a retrospective application under s73a and (b) “There is no BNG metric – as version 0 was approved by Parliament all versions have to be approved version 1 has not been approved.

This argument is legally misconceived. Mandatory BNG has applied to major development since 15 January 2024 and to minor development since 2 April 2024, pursuant to Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). The statutory biodiversity metric has been formally approved by the Secretary of State and is in force. Retrospective applications made under section 73A are not exempt from the statutory BNG condition. The applicant cannot simply assert that the legal framework does not apply to them.

Furthermore, paragraph 6 of Schedule 7A to the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021) provides that where unauthorised degradation of onsite habitat has taken place between 30 January 2020

and the date of the application, the pre-development biodiversity value must be calculated as the value of the habitat immediately before the degradation activities were carried out.

8. Tree Preservation Orders and “No Trees” Claim

The applicant’s Arboricultural Impact Statement (27 March 2026) claims “there were no trees on the land that has been developed”. Whilst this may be the case on the developed plot itself (which was largely grassland), this claim conveniently ignores the fact that trees were felled along Range Road on the evening of 6 March 2026 in order to allow the passage of heavy machinery and static caravans down the narrow lane. Local residents witnessed this. Range Road is covered by TPO-1934-2023 and TPO-1904-2022, both of which can be confirmed in the Council’s own records. The felling of trees to facilitate unauthorised development is itself a material consideration and may constitute a separate breach of the TPO.

The statement further claims that three adjacent oak trees are “in good condition” and that a track of permeable hardstanding has been laid between them. A proposal to lay “matting” as a “precaution” after the development has already been completed offers no meaningful protection. The weight of caravans, vehicles and hardstanding on or near root protection areas will cause compaction over time. This is not a credible Arboricultural assessment. It is a single page of assertions with no survey data, no root protection area calculations, and no arboricultural method statement from a suitably qualified professional (e.g. a member of the Arboricultural Association or Institute of Chartered Foresters).

9. Shadow Habitats Regulations Assessment (sHRA)

The applicant’s Shadow Habitats Regulations Assessment is extraordinary. Rather than assessing the likely effects of the development on the Thames Basin Heaths Special Protection Area (SPA), instead advances a conspiracy theory that Natural England has “tampered with inventory” to “increase tax revenues” and that the SPA designation is invalid because it has not been registered. It concludes that no SANG/SAMM contribution is required.

This argument is made without any factual or legal basis. The Thames Basin Heaths SPA is a European-designated site, confirmed under the Conservation of Habitats and Species Regulations 2017. Wokingham Borough Council’s own adopted policy TB23 (Managing Development and Delivery DPD, 2014) require that all new residential development within 5km of the SPA to make SANG AND SAMM contributions. The site

falls within this zone. As such, the council must carry out its own Habitats Regulations Assessment under Regulation 63 and should disregard the applicant's sHRA entirely.

It is also open to the Council to disregard wholly the sHRA submitted and to commission its own Appropriate Assessment under Regulation 63 before determining this application.

10. Great Crested Newts

The applicant's Great Crested Newts report (27 March 2026) claims that a "fingertip search" of the land was conducted before development. A 'fingertip search' is not a recognised Great Crested Newt survey methodology. The standard approaches endorsed by Natural England are Habitat Suitability Index (HSI) assessment, followed by eDNA sampling (available between mid-April and end-June), or presence/absence surveys using torch surveys, bottle trapping or egg searches conducted during the relevant survey window.

The report dismisses Natural England's advice and provides no data from recognised survey protocols (such as eDNA testing or bottle trapping). Given that the site lays within an amber zone of the NatureSpace map (as mentioned in the application itself), the Council should require a proper ecological survey before determining this application.

11. Community Involvement

The applicants Community Involvement Statement is a single paragraph that effectively argues that no community engagement was needed because the applicant "purchased the land on the open market so it is assumed that no-one had any objection as to what use it was put". This is a breathtaking misunderstanding of the planning system. The purchase of land does not automatically grant planning rights whatsoever, and the community's right to be consulted on planning applications is a fundamental principle of the development management process.

12. Light Pollution and Residential Amenity

Range Road is a dark, unlit rural lane within a countryside setting. The introduction of static caravans with external lighting and floodlights has already created significant light pollution (see **Figure 5 and 6** below) which has been rarely switched off overnight. The illumination of the site is visible from considerable distance and has a demonstratable impact on the rural character of the area and on local wildlife, including nocturnal

wildlife (Bats and Owls, both of which can be frequently seen and heard flying throughout the woodland at night).

PPTS Policy B (paragraph 13(e)) requires “proper consideration of the effect of local environmental quality (such as noise and air quality) on the health and well-being of any travellers that may locate there or on others as a result of new development”. The introduction of a lit residential site into this dark rural corridor causes measurable harm to the amenity of existing residents and to the ecological value of the area.



Figures 5 and 6: What the woodland looks like when it has access to electricity. Extreme use of lighting and floodlights causes large amounts of light pollution. *Images captured 9th of April 2026.* (Note SSE have recently cut off the electricity at the site so is currently dark at night.)

13. Erosion of the Green Gap and Landscape Character

Range Road serves as a key green gap between the historic forest rides of Nine Mile Ride and Sandhurst Road, as identified in the Finchampstead Neighbourhood Development Plan. The Wokingham Landscape Character Assessment (2019) places this area within the Character Area M1, a landscape of high sensitivity.

The agent's Design and Access Statement describe the development as "merely an 'infill' development in an existing residential area". This characterisation is materially inaccurate. The site is deep within a wooded green gap, not within or adjacent to a residential area. The nearest residential properties are on Nine Mile Ride, separated from this site by woodland. The development is not "infill": it is incursion into open countryside.

14. Cumulative Impact

The Council must consider the cumulative impact of this application alongside application 260439 on the opposite side of Range Road. Together, these two sites represent substantial and harmful encroachment into the green gap. The agent's Design and Access Statement refer to "sporadic residential dwellings" to justify development, yet this application itself (260577) should not be used as a baseline to justify 260439, nor vice versa. Neither has planning consent at the time of writing this letter, and an unauthorised development cannot constitute a material change in the character of the area.

15. Procedural and Factual Deficiencies in the Submission

The submission contains the following factual and typographical errors, inferring a clear lack of professionalism:

- *The Planning Statement is headed "PLANINING STATEMENT" [sic].*
- *The site address is variously given as "Finchampstead, Woking" and "Birkshire" [sic]. The borough is Wokingham and the county is Berkshire.*
- *The Contamination Screening gives the address as "RG30 1NR" [sic] with Easting and Northing values of 400787 and 165268. These coordinates correspond to a location near Heddington, Wiltshire — not the site under application.*
- *The Arboricultural Impact Statement states: "there were no trees on the land hat has been developed" [sic].*
- *The applicant has referenced the address as the "Caravan Site Land South Of **Valoris**" – seems a strange decision to call it this given it was never a caravan site before. Additionally, the neighbouring land is called "Valois".*

In addition, the following technical documents that should accompany any application of this nature have not been provided:

- *No professional ecological survey.*
- *No BNG statutory metric calculation.*
- *No formal arboricultural survey by a suitably qualified professional.*
- *No transport assessment or highway safety appraisal.*
- *No landscape and visual impact assessment.*
- *No pre-application advice sought from the Council.*

16. Utilities and Services

On the information available to local residents, this site has no mains water, gas or electricity connections. The application form indicates foul sewage disposal via “unknown” but provides no details of its specification, location, or environmental suitability.

From my understanding, a septic tank has already been installed on the site. The Council should investigate when this took place and whether the excavation required for its installation was carried out within the root protection areas of trees covered by TPO-1934-2023 and TPO-1904-2022. The installation of a septic tank requires substantial ground excavation, which directly contradicts the applicant’s repeated assurances of a “no dig” approach has been taken. The Council should also investigate whether any required Building Regulations approval or Environment Agency consent was obtained for this installation.

Furthermore, the Council should also seek clarity from the applicant as to how the site is currently receiving electricity and water, and how it intends to receive these services lawfully on a permanent basis. If formal utility connections are required, this would necessitate further ground excavation along Range Road and through root protection areas, causing additional harm to protected trees.

A residential site that cannot demonstrate a lawful and sustainable means of accessing basic utilities, and which appears to have already undertaken unauthorised excavation works in the proximity to TPO-protected trees, is not a viable or acceptable development.

17. Inconsistency with PPTS Policy H Considerations

PPTS Policy H (paragraph 27) states that weight should be attached to sites being “sites being well planned or soft landscaped in such a way as to positively enhance the

environment". This site has been covered in dark tarmac, hardstanding laid and static caravans stationed with virtually no soft landscaping retained. The contrast between the developed site and the surrounding green fields and woodland is stark and visible just by walking past. Small, isolated patches of grass remain, but these appear incidental rather than planned.

Paragraph 27(d) further states that weight should be attached to "not enclosing a site with so much hard landscaping ... that the impression may be given that the site and its occupants are deliberately isolated from the rest of the community.". The near-total coverage of the plot in hardstanding achieves precisely this effect. It creates a visually harsh, isolated enclave that bears no relationship to the rural woodland character of its surroundings. This site does not enhance the environment; it materially degrades it. No landscaping scheme, planting plan, or consideration of visual amenity has been provided in the application.

Conclusion

This application is one of the weakest planning submissions I have encountered. It is riddled with factual errors, internal contradictions on its own application form, conspiracy theories advanced in place of statutory assessments, a non-existent ecological assessment, no BNG metric, no arboricultural survey by a qualified professional, no transport statement, "Unknown" given as the means of foul sewage disposal, and a Community Involvement Statement that argues no engagement was necessary because the land was purchased on the open market.

The development was carried out deliberately, after council hours, without authorisation, under the cover of darkness, damaging Range Road and its trees and has created substantial light pollution in a dark rural corridor. The site lies in open countryside outside all settlement boundaries, within Thames Basin Heaths SPA mitigation zone, and adjacent to TPO protected trees.

If taken individually, several of these points would justify undisputed refusal. Taken together the planning balance falls overwhelmingly against this application. I urge the council to refuse this application and to take appropriate enforcement action to remedy the unauthorised development that has already taken place.

Yours faithfully,

Oliver Frewin

Nine Mile Ride, RG40 3NL