

27th August 2026

Planning Reference : 261695 – Luckley House School, Luckley Road, Wokingham RG40 3EU: Proposed Sports Pitches and Associated External Works

Objection to Planning Application 261695

This objection is submitted on behalf of a group of residents from Hart Dyke and Denby Close. We have formed a group (HDC Advocates for Countryside and Environment (ACE)) whose members have reviewed the planning application in detail.

The objections outlined below reflect our joint concerns (see a list of members of this group at the end of this document). We will also be submitting individual objections as the development is likely to affect us in different ways.

SUITABILITY OF THE SITE

The fundamental concern of HDC ACE is the suitability of the site for sports pitches. The proposed intensity of sports pitches for rugby/football, cricket and athletics use cannot be accommodated in this constrained countryside site without unacceptable impacts on neighbouring residential amenity and the character of the area.

The site owned by the school is currently classified as countryside and in very close proximity to existing residents (less than 1 metre from some of the neighbours living and working spaces for numbers 14 and 15 Hart Dyke Close). The proposal has a major impact on our residential amenity (see below for details), as there is inadequate separation from our properties.

The school does not own the remaining section of the field, which we consider would be a much more suitable location, although this would then adversely impact residents of Luckley Wood. Distance offers much greater protection from sound. Distance would also significantly reduce the need for the mitigation measures proposed in the application. The mitigation measures suggested directly result in a major adverse effect on the residents' amenity.

There are local private schools who already have rugby, cricket and athletic facilities, within 1 mile of the school. The new development on Grays Farm also plans to have 5 grass sports pitches available for hire. The application does not demonstrate that alternative facilities have been adequately investigated, or that the proposed development is necessary on this particular site. A collaborating arrangement with an alternative provider would negate the need for this proposal.

PREVIOUS PLANNING HISTORY OBJECTIONS – PA170261 & Appeal PA190286

Many residents of Hart Dyke and Denby Close were involved in the campaign to save Woodcray Countryside (a record level of almost 500 people objected to the proposal).

The planning inspector ruled that the site was unsuitable for development. A summary of relevant reasons which we believe are applicable to this application are as follows;

- The site was outside of any settlement boundary;
- The site is within the open countryside;
- The site forms part of the rural setting of Wokingham;
- The scheme would cause harm to the character and appearance of the area;

- There would be a major adverse visual impact on receptors adjacent to the site;

In 2019 The planning inspector also noted that “an area of land was to be provided for Luckley House School to utilise as a playing field. However, the school is private, and this would only be of benefit to a relatively limited number of people. Consequently, I afford limited weight to this benefit”.

We recognize that the previous planning appeal related to a different proposal and does not determine the outcome of the present one, nevertheless the inspector’s findings are relevant. They recognized the sensitivity of this countryside location and the relationship between the site and the nearby residential receptors.

PLANNING POLICY OBJECTIONS

The proposer lists policies that they believe support their case. We are certainly, not in any way, planning experts but we have made a genuine attempt to understand how they relate to this proposal and if a fair presentation of facts has been given by the proposer.

Please see our Errors/Omissions and Misleading Statements section (at the end of this document) for a fuller review of these policies. A summary of our main points is listed below.

We have not found strong support for this proposal in the planning framework.

Local Plan Update (LPU) Policy SS1 – We do not consider that the playing fields and external works will contribute positively to the character and identity of the area, maintain the separate identity of settlements, or deliver biodiversity measurable net gain. The development results in a biodiversity net loss.

LPU Policy SS2 – Part 2 the development is beyond current defined settlements. The land is currently within designated undeveloped countryside. The fact that the site adjoins Wokingham does not remove the site from the countryside designation or establish that development on this land forms part of the Major Settlement. The application should therefore be fully assessed against the countryside provisions of SS2 and SS5.

LPU Policy SS5 – Part 2 reference point i) the application relies on the requirement for the proposal to be necessary, reasonable and proportionate.

We believe that the proposal fails to demonstrate that it is necessary, reasonable and proportionate.

Necessary – The application does not adequately demonstrate why the proposed scale and configuration of sports provision is necessary, as opposed to desirable, or why existing facilities and alternative provision cannot meet the identified need. The school has attracted a school population of 50% of boys without these additional facilities, we do understand that increasingly girls also play these sports.

Reasonable – Given the unusually close relationship between the proposed sports activity and neighbouring dwellings, and the extensive mitigation required, we question whether the proposed intensity of use is reasonable in this location.

Proportionate – The extent of acoustic fencing, ball netting and other infrastructure required to accommodate the proposed uses within this constrained site raises a fundamental question as to whether the proposed development is proportionate to the site and its surroundings.

Part 3 outlines a landscape led approach to development, and any development should contribute to and enhance the local, natural historic environment. We cannot see how the proposal shows a landscape-led approach, as there are only specifications shown for the hard landscaping elements of the scheme, namely the acoustic fence and ball netting, there is no soft landscaping specified.

Wokingham Borough Core Strategy Policy CP3 – General Principles for Development specifies for a high quality of design without detriment to the amenities of adjoining land users, occupiers and their quality of life. It also stipulates that developments should maintain or enhance the ability of the site to support fauna and flora including protected species.

To the extent that the application relies upon provisions of CP3 that specifically relates to housing development, those provisions should not be treated as direct policy support for the present proposal. More generally, CP3 requires development to be of an appropriate scale, layout, form and character and without detriment to adjoining occupiers or their quality of life. We do not believe this proposal satisfies these requirements.

Managing Development Delivery Local Plan (MDDLDP) Policy CC02 – Development Limits – the site is at the edge of settlement however it does not respect the transition between the built-up area and open countryside, by taking account of the character of the adjacent countryside and landscape.

The proposed 3.5m acoustic fence, additional ball netting, rugby posts, artificial wicket and maintenance access would introduce substantial urbanising features into an otherwise open countryside settings.

LPU Policy HC1 – In full section 1 of the policy goes on to say that the development should help to contribute to reducing deprivation and inequalities in the borough.

LPU Policy HC4 – this policy will be considered under the next section Loss of Amenity.

Supportive Policies - We note that there is no mention of the Open Space, Sports and Recreation Strategy – November 2013.

A relevant section states “the council does not favour the pepper potting of sports pitches within new developments due to the difficulty in providing the ancillary facilities required, such as car parking and changing rooms/pavilions on small scale schemes. The council is committed to a ‘Sports Hub’ approach. We would like to further question why the use of the planned new facilities on Grays Farm hasn’t been investigated.

We understand from the school website that it does hope to have a pavilion facility eventually. It is noted that this does not form part of this proposal and is likely therefore to be the subject of a further planning application in the future.

LOSS OF AMENITY

The application relies heavily on the policy HC4 for support.

For context we have included extracts from the Wokingham Local Plan Update 2023-2040 (LPU).

Policy HC4 part 3 - Development proposals for open space, sport and recreation and play facilities will be encouraged and supported, **in line with other policies in the Local Plan Update** and Sport England guidance. New open space, sports, recreation and play facilities **should be well related to the communities they serve** and should, where possible, promote their dual use by being co-located with other community uses, such as schools.

There is a direct conflict between policy HC4 and policies DH2 and HC8. We understand that when policies conflict, the framework is that amenity protection of existing residents takes precedence over encouragement of new facilities. The conflicting policies are explored below.

Policy DH2 : Safeguarding amenity

1. Development proposals must ensure there are no unacceptable impacts on the amenity of existing or future occupiers. This includes the impact of individual development or, cumulatively, in combination with other development. [We consider that there will be significant impacts to existing occupiers.](#)

2. Development proposals should be sensitively designed and provide measures to avoid and/or mitigate against existing or potential impacts, in terms of:

a) Loss of privacy and overlooking; [The area designated between residential boundaries and the new acoustic fence has the potential to create privacy issues and overlooking. The proposal is unclear if this area will be made secure from users of the facilities, and how access to this area will be prevented.](#)

b) Unacceptable overshadowing and a loss of daylight/sunlight; [The 3.5m acoustic fence is within 5-6m of some of the neighbours' boundaries and will cause overshadowing and a loss of daylight/sunlight.](#)

c) Visual intrusion, dominance or undue sense of enclosure, or an overbearing impact or harmful loss of outlook; [In the landscape report the WBC Landscape Architect states that an extended blank fence from these rear gardens will not be a pleasant view. The proposal states that "the fence is away from the boundary of the adjoining houses and is of sufficient distance to ensure no obtrusive effect upon their outlook". This is not correct.](#)

[Not every property has an existing rear garden to separate them from the fence \(the application is also misleading in this regard\). The huge 3.5m fence, ball netting and rugby posts will undoubtedly be unduly dominant, resulting in an undue sense of enclosure and have a massive, overbearing impact on the properties.](#)

d) Noise, vibration and disturbance; see section below. [There will be use of heavy machinery required to maintain the hedges and pitches, and this is likely to generate vibration and disturbance on a regular basis. \(See section on HC8 below for more about this\).](#)

e) Artificial light pollution; [Use of the facilities in extended hours, as submitted in the application, will almost certainly require floodlights. These are not included in the current application which we believe is very misleading and inconsistent with the planned use of the facilities.](#)

f) Odour, dust and fumes; and (see d) above regarding the use of heavy machinery).

g) Crime or the perception of unsafe environments. There are concerns about the safe use of the area of boundary in the strip of land between the residents' properties and the fence. Some residents have young children and can't see how they can be protected from intrusion from any person accessing this secluded area from the school site.

Furthermore, the likelihood of cricket, rugby and footballs careering across the fence and at high velocity and hitting residents in their gardens, or homes is a real concern. We don't understand why a ball strike survey has not been commissioned. This would have informed the proposed layout and suitability of the pitches. The absence of this survey means that the proposal does not demonstrate how the proposed pitch layout provides an adequate margin of safety between sporting activity and neighbouring properties.

The residents believe they have a legitimate expectation of being able to enjoy quiet domestic use of their gardens and outdoor spaces.

3. Part 3 is not relevant here.

4. Where necessary and appropriate, to protect the amenity of neighbouring occupiers planning conditions will be used to restrict hours, area(s) and the type(s) of use or operation.

The application is vague in this regard other than to say that the school will use the facilities during school hours and that they also intend it for use by the local community outside the school use. Weekend and school holiday use is to be expected, so there will be no periods of respite for the residents.

Existing residents in both Hart Dyke and Denby Close have told us that existing conditions imposed on the school in a previous planning application are breached. Their properties are at least 52m away from the existing Multi -Use Games Area (MUGA). The proposal states there would be a high degree of supervision and management to prevent an unacceptable impact on the amenity of existing occupiers. The school has already demonstrated that this is ineffective. We question how management is even possible with external lets.

The impacts specified in this section should not be considered in isolation. The proposed development would introduce a concentrated range of sporting, acoustic, visual and safety impacts immediately adjacent to existing homes. The cumulative effect is central to the assessment of whether the proposal satisfies DH2.

Policy HC8: Noise pollution

1. Development proposals must demonstrate how noise impacts have been addressed, to protect sensitive receptors, including existing and proposed dwellings.

The residents have undertaken an analysis of the Noise Impact Assessment report (NIA). This has been submitted as a separate planning objection by Jeremy Crewe from the ACE group.

The key points noted include;

- That the proposed sports development would place a high-intensity sporting activity extremely close to our homes.
- The pitches are too close; the rugby try lines/in goal areas are immediately adjacent to residential boundaries and only 5-7m from proposed boundary fencing.

- The NIA does not assess simultaneous use of both rugby pitches and football has not been assessed, even though we understand that this is part of the school's plan. Football has a repeated high-velocity ball impact against fencing and goalposts.
- The predicted 50db LAeq is already at or above the relevant benchmark. Why put the activity so close to residents and then rely upon a 3.5m acoustic fence?
- Peak noise is potentially much more intrusive, and the human voice may have been underestimated.
- Cricket has not been properly represented, and athletics noise has effectively been excluded (the athletics track being sited right next to the residential boundaries).
- Spectators, coaches and PA systems are insufficiently accounted for.
- Out of hours / community use has not been assessed, and the noise management plan is inadequate.

Based on our research, and in conclusion, the claimed mitigation attempts to limit noise exposure to protect residential amenity cannot be relied upon as the NIA understates or omits several important noise sources and operating scenarios.

In the previous noise impact assessment report, prepared by Wardell-Armstrong for Gladman Developments Ltd, it is relevant to note that the primary noise heard from the site was birdsong and faint traffic sounds.

The HC8 LPU wording establishes a hierarchy;

Assess noise-review layout-review internal layout-physical mitigation-refusal where significant adverse effects remain. We must question why the layout of the pitches was not redesigned to create increased separation from residential properties without resorting to a 3.5m acoustic fence?

Even with the 3.5m acoustic fence we understand that noise will still travel around and over the fence to reach neighbouring properties.

The issue is not simply whether the predicted average noise level is acceptable. It is whether the assessment has adequately captured the full range of activities and noise characteristics that the proposed development could generate. In our view, the omissions identified above mean that the Council cannot safely rely upon the NIA's conclusions.

[We conclude that the acoustic fence is an admission of harm to residents, we question its effectiveness and it also creates significant new visual harm.](#)

[The mitigation of noise does not remove the planning impact. Rather, it transfers part of that impact into visual enclosure, landscape intrusion and overshadowing.](#)

Finally in policy HC4 can be found that new facilities **should be well related to the communities they serve.**

The proposal indicates that the facilities will be available for the wider community, however the practical details for this are scant. A small number of local groups currently hire the existing school MUGA facility. Current residents of Denby Close have stated that have been multiple breaches in the planning conditions imposed when approval for the MUGA was given in 2019.

It would seem to us that these new facilities will cause significant harm to the neighbouring residential community. The application provides insufficient evidence to demonstrate that the proposed facilities would be meaningfully accessible to and used by the wider community, rather than primarily serving the school.

In the Amenity section of the proposal the proposer states “it is considered there would be no conflict with policy DH2, which states development must have no unacceptable impact on the amenity of existing occupiers, and Policy HC6 (they mean HC8 we believe) that requires development to have no adverse effect by virtue of noise disturbance.” For the reasons stated above we completely rebut this statement.

Policy HC7: Light Pollution

Proposals for lighting the new pitches are conspicuously absent from the application, although the plans are marked for flood lighting in the Arboricultural Impact Assessment Report. We understand there are policies laid down for regulating the use of artificial lighting.

The proposal states that the pitches will be used beyond normal school hours, including community use, but it doesn't explain how this use is intended to operate during winter months when natural light is limited.

We request that the school disclose their plans for further lighting in the interests of transparency, rather than make them subject to a further planning application. We believe the addition of lighting would have a huge detrimental impact on the surrounding area and therefore we request that the council should require clarification as to whether artificial lighting is part of the schools future plans.

PITCH PLANS

We have looked in depth at the proposed pitch layouts and have concluded that they are currently dangerous.

The pitches are very close to the boundary fences (from the plan it appears around 5-6m to the proposed acoustic fence). The configuration appears to make intensive use of the available land, leaving limited separation between active sporting areas and neighbouring properties.

The existing school sports MUGA pitch is at least 52m away from existing residents, replaced existing facilities and yet there was still significant objection to it, planning reference PA190673.

The orientation and location of the cricket pitch running East-West is unsafe, due to setting sun.

The size of the field does not allow enough space for a cricket field to be safely used, the 3.5m boundary fence could cause significant injury to fielders.

A ball strike survey has not been commissioned, however the risk of a strike to the neighbouring properties, and residents in their gardens and homes is a significant issue. There is just not enough runoff distance to prevent this.

Turning the pitch would then prevent use of the rugby/football pitches.

For rugby and football, due to space restrictions catch nets are suggested, however these are positioned in the runoff area, which again is dangerous.

LANDSCAPE & CHARACTER

The proposal suggests that the playing fields merely result in a more formalized appearance to the land through the maintenance as grass pitch.

They state there would be little change to the physical character of the land.

We cannot reconcile these changes with the proposal to erect

- Rugby Goal Posts
- 3.5m high Acoustic Fencing
- Artificial Wicket with a specialist carpet surface
- Ball Netting
- Permeable Vehicle Crossing to allow for pitch maintenance vehicles.
- Engineered perimeter mesh fencing

The proposal would not simply formalize the management of existing grassland. It would introduce a substantially different physical character. The effect should therefore be assessed as a material change in the character and appearance of this part of the countryside.

TREES & LANDSCAPING

Two protected trees and nearby hedgerow will need to be felled to create vehicular access to the pitches.

The arboricultural impact assessment does not include the plans for the acoustic fence, therefore the impact of this has not been assessed in the report. This is a major omission.

Protected trees around the site boundaries are also at risk from damage to their root systems from construction of the huge acoustic fence. For the fence to be stable (and not act like a sail in high winds) the foundations are going to have to be very deep. The branches of some of the trees bordering the site will overhang the fence in places so will probably need to be cut off. They will also create additional noise disturbance by rubbing against the acoustic fence.

The proposal states that “New planting is proposed around the site to assist in screening”. There is no detail supplied about the proposed screening so we cannot therefore assess this aspect of the proposal, which is highly relevant to us.

The WBC landscape architect does require a landscape condition to include a soft landscaping scheme, and specifies the types of trees and hedgerow, and interval of planting.

Unless very mature specimens are purchased it would seem to us that this affords little consolation for the unsightly looking barricade that we will be faced with daily.

ECOLOGICAL APPRAISAL

The residents have undertaken an analysis of the Preliminary Ecological Appraisal (PEA) and compared this to a previous ecological appraisal dated 2017. The findings have been submitted on the planning portal. This comparison notes some significant omissions and casts doubt on the reliability of the appraisal. The acoustic fence was not marked on the plan in the PEA.

There was no bat survey submitted as part of the proposal, which seems like a major omission given that residential properties have had to commission these as part of their home extension planning applications.

The proposed netting, although not specified in detail, is a cause for concern for the local bat and bird population, which we see regularly circulating in the area.

FLOODING

The site is prone to flooding, as witnessed by the residents over many years. The brief flood risk assessment seems at odds with a previous assessment.

One of our members has separately submitted an objection on this subject and as a group we have serious concerns that this element of the proposal has been glossed over.

It would seem to us that it is highly likely that the new playing fields will flood, especially along the vehicle access route, along with the existing fields without significant drainage works. If the fields become impassable in the winter months we question the usefulness of the new sports pitches.

As stated by WBC Drainage there is no site-specific drainage design no runoff calculations, no SuDS assessment, and no consideration of how the proposed ground works interact with existing drainage on and around the site.

The Council's drainage concerns indicate that the submitted information is insufficient to demonstrate that the development would not increase flood risk to neighbouring properties, especially to Luckley Wood and Luckley Road.

HIGHWAYS

The proposal states that "highway matters aren't considered relevant. All existing parking is retained, and the proposals don't serve to increase the capacity of the school giving rise to the need to provide additional parking ". We believe this is misleading.

This statement surely contradicts the section in the proposal that suggests community engagement. If the school do intend to let the facilities this will have a negative impact on the already severely congested Finchampstead Road. There are no public transport options to the site and access to the site via cycleway is very limited.

In accordance with their plan if the school host home matches and run them concurrently (as they plan for two pitches), this will lead to a rise in the amount of traffic coming and going to the site.

Regarding parking we have heard from a neighbour along Finchampstead Road who has said that she believes the current car park can't cope with the number of cars needing to use the site, and also that it's extremely noisy at times with the slamming of doors, use of horns and people talking/shouting.

Surely if the number of facilities at the school increases, then the car park will need to as well.

Another neighbour from Luckley Wood has advised that Luckley Road is like a chicane as school parents park along Luckley Road, due to insufficient parking at the school.

Hart Dyke Close suffers from additional traffic due to the lack of parking for parents at Evendons School. The busy junctions at Hart Dyke Close, Evendons Lane, Luckley Road and Tangle Drive will all be further impacted by an increase in the volume of traffic using the already congested Finchampstead Road.

Contact sports will inevitably generate injuries, which on occasion will need medical assistance. The sports pitches are located a long way from the main road. Any emergency vehicles would have to drive far through the school grounds where children will be walking. This will inevitably add a safety risk because the proposed sports pitches are in an unsuitable location.

OTHER RELEVANT INFORMATION

Necessary Development

The proposal states that the playing fields are “necessary”. An extract from the Independent Schools Inspectorate (ISI) School Inspection Report, December 2024 concludes that

“Standards relating to pupils’ physical and mental health and emotional wellbeing are met.”

The inspection evidence does not establish that the proposed facilities are necessary to remedy an identified deficiency in pupils’ health or wellbeing. The school should therefore provide clearer evidence of the specific educational need that the proposed scale of provision is intended to address.

The school has already achieved a 50% boy/girl ratio.

Former School Objection

In 2017 a former bursar of Luckley House, Norman Patterson, completed an objection to the development of the same site PA 170261. Comments, relevant to this application, are outlined below;

“Surface water: despite keeping the ditch completely clear at all times it cannot cope with the flow during heavy rainfall. In fact our own playing fields flood as a result.”

“We also consider it highly detrimental to suffer any further loss of the green gap that exists between Wokingham and Finchampstead.”

“Wildlife: the school highly values the diversity of species found within the school grounds and our pupils are positively encouraged to appreciate and learn about the wildlife. Deer are to be found almost daily in the school grounds and we make no effort to prevent them from entering the site.

“The development of the field would result in the complete loss of deer and significantly impact what are already shrinking habitats. It is very difficult to see how Wokingham could benefit from this development in any way”.

It is interesting to note these comments as it provides historical evidence of the site’s environmental and drainage characteristics.

Statement of Community Involvement

It seems clear from the list of external users for existing school facilities that it is a very small group of organisations who benefit from hiring the schools' facilities. We do, however, understand from a conversation with the bursar, that in general they hope to extend letting opportunities at the school, although we were advised that it was not particularly for these new playing fields.

Regarding neighbour involvement the proposal states that the school communicated the proposals to the 8 houses that back directly onto the proposed site.

The letter contained different information from the planning application.

- The letter stated that a football pitch was part of the proposal, it is not included in the planning application.
- There was no reference to fencing in the letter, it is in the planning application.
- There was mention of floodlighting in the letter, this isn't in the planning application.

We were advised to hold off commenting on the letter from the school until the application had been submitted. This would appear to have been sound advice as the letter had some significant differences from the application.

After consultation with residents two members of ACE met with the bursar on the 12th August to ask some further questions and give some broad feedback about the concerns of residents. We explained that we would be submitting objections.

We discussed the mention on the school website of a pavilion and the bursar explained this is part of their future plans, the likely position of which is on the existing school site (on the MUGA mud pile).

We also discussed floodlighting and were advised that the school have contemplated using temporary lighting. They explained that at this stage they just don't have the funds to do these two elements of their plans.

[These differences create uncertainty as to the precise nature and intended operation of the development. The Council should clarify whether the application documents represent the school's complete and current intentions.](#)

SUMMARY

In summary we reject the assertions of the proposal on the following grounds;

- The proposed site is currently in the undeveloped countryside.
- A plan to develop this site has already been rejected in 2019 by the planning inspector.
- This development paves the way for further encroachments into Wokingham green spaces.
- It erodes the green gap between the settlements of Wokingham and Finchampstead.

- The site is not suitable for this development, and the mitigation measures (3.5m fence) are extreme due to this and they are also inadequate. The noise impact assessment analysis leads us to question the effectiveness of the mitigation measures.
- It does not satisfy many planning policies and fails others. The fundamental principle of planning law and practice is that a development must be suitable for its proposed location. Overall, we consider the site unsuitable, and it will cause significant harm to the amenity of the residential community. The acoustic fence is an admission of this harm.
- It does not enhance the nature and character of the landscape; it has a negative detrimental effect.
- The layout of the pitches is not well thought through and dangerous. The proposal just seeks to fill the land with as much sporting activity as possible. No regard has been given to neighbours in this respect. There is just not enough land to safely fulfil the applicant's proposal.
- Neighbouring properties will be hemmed in by the overbearing fence and suffer from loss of sunlight and overshadowing.
- The risk of being hit by balls is real and will result in fear whilst using our gardens. There is a likelihood of damage to our properties.
- Insufficient information has been provided to fully assess the ecological harm to the site. It will inevitably lead to a loss of fauna and flora, in favour of hard landscaping and harmful ball nets.
- Insufficient flooding/drainage assessment. The site floods annually and this will impact the use of the new pitches and could cause further flood risk to neighbouring properties.
- There is a loss of protected trees and hedgerow. There is the potential for root damage to further protected trees from the construction of the huge acoustic fence. No replacement planting is specified in the proposal.
- The highway implications are understated; this proposal will result in increased traffic along Finchampstead Road.
- The plans for floodlighting have been omitted, in most of the documents, making planned use of the pitches out of hours incompatible.
- The application has not sufficiently demonstrated the need for this development, or shown that alternative sites have been investigated. The value of the playing fields to external parties has been overstated.

We respectfully request that Wokingham Borough Council reject this planning application and do not allow the creeping urbanisation of a green field.

Errors, Omissions and Potentially Misleading Statements in the submitted Planning Application

The black text is lifted directly from the proposers' planning and design statement. The red text is our commentary on the design statement.

Section	Type	Description
Planning Policy	Misleading	There is strong policy support in the development plan for the proposed development, and this is particularly in the emerging policy framework of the district. The Submission Local plan Update 2023-2040 recognises the benefit of improving sports provision in the District. The Local Plan Update (LPU) remains under examination but has not yet been adopted. The Council's current information confirms that examination has continued during 2026. We therefore recognise that the weight to be given to its policies will depend upon their current stage in the plan-making process and the relevant statutory framework. Nevertheless, the submitted LPU is a material consideration and its policies are relevant to the assessment of this application. We do not believe there is strong policy support for this development.

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Section	Type	Description
Planning Policy	Omissions	Policy SS1: Sustainable development principles states that Development proposals will be expected to.... a)Contribute to meeting identified development needs.. e)Promote healthy lifestyles, well-being and social inclusion.. o)Provide or contribute to the provision of social, physical, transport and green and blue infrastructure to support communities. We question whether the proposal does clearly articulate an identified development need for the sports pitches. We question the social inclusion and supporting communities points above, see Planning Inspector comments. Policy SS1 also includes the following points "d) Maintain, enhance or create a high quality and safe environment which contributes positively to the character and identity of the area f) Maintain the separate identity of settlements and places, avoiding physical or perceived coalescence. m) Conserve and enhance the landscape character of the area, with particular attention paid toward significant landmarks and toward landscape attributes and features; n) Conserve and enhance the biodiversity of the area, and deliver measurable net gain;" In our opinion we consider that the proposal has not demonstrated compliance with these requirements, particularly in relation to the character and identity of the area, the separation of settlements, landscape character and biodiversity.

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Section	Type	Description
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Planning Policy	Omission	Policy SS2: Spatial strategy and settlement hierarchy 1.Growth should create strong, cohesive and inclusive communities that provide for a high quality of life. A larger number of people should be able to access jobs, services and facilities locally to help to minimize unnecessary travel. We would also draw attention to 2.The distribution of growth will be based on the following actions; a) Making the most efficient use of available and suitable previously developed land within defined settlements. b) The sustainable extension of defined major and modest settlements; c)The evolution and sustainable extension of existing and planned developments at Arborfield Green, and South Wokingham The playing fields are beyond the defined settlement area and outside of the Strategic Development Plan for South Wokingham. Policy SS2 Part 10 states: The countryside is defined as the area beyond settlements, defined in the settlement hierarchy. Except for specific allocations identified in this plan, the countryside is not a location where additional development is planned, although limited types of development to support local needs and the rural economy will be supported in accordance with policy H4 and policy H5.
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Section	Type	Description
Planning Policy	Misleading	The proposal states “The application site and the location for the proposed playing field adjoins Wokingham which is identified in Policy SS2 as a Major Settlement, with the highest range of services and facilities. Policy SS2 states that Major Settlements will be the focus of housing growth (the subject of other policies in the Plan), as that is supported by wider service provision, the expansion and enhancement of playing fields at an existing school represents improved service provision for existing and future housing growth”. In the above statement the applicant infers that this site is part of the major settlement of Wokingham (even though it says adjoins) and continues to imply that the enhancement of playing fields at an existing school is what this proposal is for, which clearly it is not. The proposed playing fields will be sited on land that is currently within designated undeveloped countryside, so we fully rebut this assertion. Does this statement also imply that these new playing fields are to service future housing growth. Is there an expectation that a further housing application is to be submitted in the nearby vicinity in the foreseeable future, otherwise we can't see why the development of the Grays farm site does not meet the school's needs. These new playing fields would be privately owned and therefore not a community asset.

Section	Type	Description
Planning Policy	Omission	Policy SS5: Development in the Countryside sets out the types of development that are permitted in such areas, which includes i) Outdoor sports, recreation, leisure and nature conservation development that is demonstrated to be necessary, reasonable and proportionate for use Policy SS5 Part 3 listed below for reference. All development proposals within the countryside must take a landscape led approach to development in accordance with Policy NE5:Landscape and design and, where applicable; a) Contribute to and enhance the local, natural historic environment; b) Be of a scale, nature and location within the countryside that is appropriate with regard to its use; c) Be sited and designated to minimise visual impact; d) Not lead to the physical, visual or perceived coalescence of existing settlements either individually or cumulatively; e) Not lead to isolated new dwellings; f) Not lead to the need for additional buildings; g) Maximise opportunities to make the location more sustainable h) Have no unacceptable adverse impacts on highway safety or have a severe residual cumulative impact on network capacity; and i) Maximise opportunities to improve public access to the countryside. There is no mention of part 3 of this policy in the application so we cannot see how these criteria have been met.

Section	Type	Description
Planning Policy	Omission	The application quotes CP3 General Principles for Development Planning permission will be granted for proposals that.... g) Provide for a framework of open space in secure community use achieving at least 4.65/1,000 population provision together with recreational/sporting facilities in addition to private amenity space; h) Contribute towards the provision of an appropriate sustainable network of community facilities; The sections quoted here are not relevant as they refer to new housing development. Core Strategy 2010 CP3 also states; Planning permission will be granted for proposals that.... a) Are 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 d) Maintain or enhance the ability of the site to support fauna and flora including protected species. Furthermore, in point h) above please see the planning inpectorate comments about the lack of contribution they deemed playing fields would have to the community.

		We have found that the proposal contradicts itself around community use. For example, in the noise impact assessment there is no assessment made for noise outside of school hours.
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Section	Type	Description
Planning Policy	Misleading	Policy CC02: Development Limits 2. Planning permission for the proposals at the edge of settlements will only be granted where they can demonstrate that the development, including boundary treatments, is within development limits and respects the transition between the built-up area and the open countryside by taking account of the character of the adjacent countryside and landscape. Without any visuals in the application, it is very difficult to see how the applicant considers this requirement has been met. We would dispute that it does meet this requirement. It is hard to see how the hard landscaping suggested in the application, namely acoustic fences, rugby posts, and ball nets take account of the character of the adjacent countryside and landscape. They are considerably more urban in appearance and would jar considerably with the current open nature of the countryside.

Page 5

Section	Type	Description
Planning Policy	Omission	Policy HC1: promoting healthy communities 1.Vibrant, healthy and safe communities will be promoted through a high-quality environment with local services to support health, social and cultural wellbeing... Section 1. goes on to say “and help contribute to reducing deprivation and inequalities in the borough. There is no mention in the proposal of how this specifically is likely to be achieved.

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Section	Type	Description
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Planning Policy	Omission	Policy HC4: Open space, sports, recreation and play facilities Existing Facilities 1. Existing open space, sports and recreation and play facilities will be protected, maintained and where possible enhanced. New Facilities and Residential Development 3. Development proposals for open space, sport and recreation and play facilities will be encouraged and supported, in line with other policies in the Local Plan Update and Sport England guidance. New open space, sports, recreation and play facilities should be well related to the communities they serve and should, where possible, promote their dual use by being co-located with other community uses, such as schools. HC4: Part 1, Existing open space. We argue that the proposed site is currently countryside, therefore cannot be categorised as an existing facility. A key point to make in HC4: Part 3 is the statement that sport and recreation will be encouraged and supported, in line with other policies in the Local Plan Update. Policies DH2 (safeguarding amenity) and HC8 (Noise pollution) - (amenity protection) must also be satisfied. They should also be well-related to the communities they serve. We argue that this proposal will cause harm to the residential community and is only “well related” to the school that it serves. Policies DH2 and HC8 are explored in more detail above.
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General Observation

Page 2

Section	Type	Description
Introduction	Errors	Incorrect references to the ages of the school pupils and the reference to Bearwood Lakes established golf club.

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Section	Type	Description
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Landscape and character policy	Misleading	In terms of Landscape Character, the site is within N1 'Holme Green Pastoral Sandy Lowland' of the Wokingham District Landscape Character Assessment 2019. The application site accords with this description, being a rough and unmanaged pasture land. In the Ecology, biodiversity and land classification section the land is also described as "unkempt pasture" The proposals would bring a more formalised appearance to the land through the maintenance as grass pitch. They state there would be little change to the physical character, mentioning rugby posts, fencing, netting and artificial grass. There is no mention in this section about construction of a permeable vehicle crossing to allow access for pitch maintenance vehicles. It is impossible to reconcile these two statements. The applicant is minimising the changes to physical character which is misleading. In our opinion the changes are very significant indeed.
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Page 7

Section	Type	Description
Amenity	Errors/Misleading	The proposals are for sports use at the existing school with the new facilities beyond the rear garden of the adjoining houses. Incorrect for 14 Hart Dyke Close whose property is adjacent to the development, not beyond the rear garden. The fence is kept away from the boundary with the adjoining houses and is of sufficient distance to ensure no intrusive effect upon their outlook. There is no specific mention of the distance metrage, we can only infer from the drawings. We estimate 5-6.5 metres from 14 Hart Dyke Close, therefore we refute this statement most strongly, see above. No conflict with Policy DH2, refute most strongly, see above. Policy HC6 is quoted "that requires development to have no adverse effect by virtue of noise disturbance. Policy HC6 is about Air Pollution and Air Quality. We believe the applicant means to refer to HC8, Noise Pollution, refute most strongly, see above.

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Section	Type	Description
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Highways	Misleading	Highways matters aren't considered relevant. The proposal is inconsistent in this regard. There will be increased traffic if home matches are to be held, especially if the two pitches are to be used concurrently. There is very likely to be an increased demand for parking to allow for additional spectators. No account has been taken of the impact of letting the pitches to external users which the applicant states is their intention and the increased traffic that will result.
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Section	Type	Description
Trees	Error/Misleading	The Arboricultural Impact Assessment does not include a plan with the 3.5m acoustic fence depicted. As such no impact has been assessed on the acoustic fence foundations on the trees surrounding the new pitches. Likewise, no assessment has been made for impact on trees with branches that overhang the acoustic fence. It would therefore appear that the impact assessment is incomplete.

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Section	Type	Description
Ecology	Error/Misleading	The Preliminary Ecological Appraisal does not include a plan with the 3.5m acoustic fence depicted. As such no impact has been assessed on the ecology of the site. It would therefore appear that the appraisal is incomplete.

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Section	Type	Description
Artificial Lighting	Error	The Arboricultural Impact Assessment shows floodlighting in appendix 1. Floodlighting to the pitches does not currently form part of the applicants proposal.

Members of Hart Dyke & Denby Close – Advocates for Countryside and Environment (HDC ACE)

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