

PLANNING REF : 252595
PROPERTY ADDRESS : Barkham
:
: RG41
SUBMITTED BY : Mr . King
DATE SUBMITTED : 12/01/2026

COMMENTS:

I object to this major planning application for the following reasons:

- 1) the application site is not in a sustainable location with regard to walking distances to local amenities and public transport.
- 2) the application site is located in the countryside, outside development limits, and its proposals would result in an unacceptable reduction in the separation gap between the settlements of Langley Common and the Arborfield Cross LDL/Conservation Area.
- 3) the proposals would cause unacceptable harm to the quality of the prevailing landscape.
- 4) the proposals would cause harm to the setting of Langley Pond Farm, a Grade II listed heritage asset.

Each point is addressed in further detail below. Due to the inclusion of graphics, an appendix to these comments has been submitted separately.

1) Unsustainable location

Paragraph 3.51 and Table 2 of the Transport Statement (TS) are significantly misleading with regard to access to public transport (bus services). First, the table cites bus service 154 as picking up/setting down one day per week at a bus stop located in Langley Common Road, approximately 400m east of the application site's proposed southern pedestrian access point. This service is operated by Horseman Coaches, a private coach hire company. It runs between central Reading (St Mary's Butts) and Great Hill Farm, Beech Hill and this route reversed. The service operates nowhere near Barkham whatsoever, a fact confirmed to me by Horseman Coaches on 15 December 2025 (telephone 0118 975 3811 for verification). The other bus

service (the F52) cited as using this stop is provided by Newbury & District Buses for Reading FC's supporters travelling to and from the Select Car Leasing (Majeski) Stadium, operating on home match days only (37 days in the 2025/6 football season). In reality, therefore, the bus stop described has been non-operational (except for the extremely limited F52 service mentioned) for in excess of a decade. Given this, the reason why it has been relied on in the TS is not clear.

The only regular bus service whose stops are accessible from the application site is Reading Buses' Leopard 3. Its route in relation to the site is depicted in Appendix 1. The closest stop from which this service picks up/sets down (Biggs Lane) is located approximately 916 metres west of its approximate centre, via the proposed southern pedestrian access on Langley Common Road. The accepted methodology for measuring walking distance from any

development site is from its approximate centre, whereas the applicant appears to have used the locations of its external access points (or some other unidentified method), which result in lower values.

The next closest stop is located on the Eversley Road, in Arborfield Cross (The Swan). The TS quotes the distance to this as being 850 metres but this is again incorrect. Via the application site's proposed northern vehicular/pedestrian access in School Road, the distance is greater, at approximately 960 metres. This is via two pathways in Arborfield Cross which are unlit and not used by some individuals because of safety concerns but which nevertheless represent the shortest walked distance possible and are thus employed in the measurement for accuracy. Both of these distances exceed the 800 metre walking distance threshold established for amenities such as bus stops, set out in the National Design Guide and Manual for

Streets (see later), and would thus dissuade the future residents of the application site from using this mode of transport. It is noteworthy also that a significant section of School Road between the proposed site access in it and Arborfield Cross (at least 330 metres) is unlit, making it similarly uninviting to walk in darkness. For

completeness, the walking distance to the nearest bus stop east of the application site (the Bull PH at Barkham) has also been included and, at approximately 1.22 km, exceeds the threshold significantly. Maps relating to all measurements cited are contained in Appendix 1.

Clearly, the inaccuracies referred to also render unsound the trip rate calculations cited for this mode of (public) transport in section 5 of the TS, the conclusions drawn from them and, consequently, the associated assertion of genuine alternative modal travel options being available to future residents of the application site.

Furthermore, although the Leopard 3 service timetable was improved in the latter part of 2025, no guarantee has been provided by Wokingham Borough Council for its permanent future funding and, consequently, it may not be available in its current form when (or before) the

proposals would be completed. Even currently, because of the service's circuitous route, journey times to Reading and Wokingham are lengthy: from the stop at Biggs Lane, for example, the average time to Broad Street, Wokingham is 26 minutes (when it can be driven in half that time by car) and to St. Mary's Butts, Reading is longer at 51 minutes. Regarding the latter route, only a SINGLE service in the morning timetable (the 08:51am departure from Biggs Lane) reaches Reading BR station, the region's major rail commuter hub. Finally, there are no bus services whatsoever from Barkham or Arborfield to

Winnersh, with its significant employment centre and nearest BR station (to the application site) for commuting to wider destinations.

Neither is cycling a practical or popular alternative means of transport in Barkham. Local roads are narrow, several are unlit and the surfaces of many (if not the majority) are so poorly maintained by the local highways authority that they represent an existential safety risk to cyclists. Add to this the sheer volume

of traffic on B-roads which are being expected to function as A-roads (in particular the B3349 Barkham Road, the primary east-west route for journeys to and from Wokingham) and the result is an observable and notable absence of cyclists using them. There is no empirical evidence to demonstrate that initiatives intended to increase modal travel choice for residents of new developments, such as those provided by My Journey Wokingham, have any significant impact in reducing the use of private motor vehicles.

The combination of the factors mentioned means that, in reality, there would be NO practical, genuine alternative modes of transport open to the future residents of this proposed development and so its approval would lead to an over-reliance on private motor vehicles, contrary to Adopted Core Strategy policy CP6.

In terms of walking distances to local amenities generally (ie other than public transport facilities), The National Design Guide defines 'walkable' as local facilities being no more than 10 minutes' walk (800m radius) for most of dwellings. Paragraph 6.3.1 of the Manual for Streets explains that individuals' propensity to walk is influenced not only by distance but also the quality of the walking experience. The MfS advocates for 'walkable neighbourhoods', which are typically characterised by having a range of facilities within 10 minutes/800m walking distance of residential areas. This distance is widely adopted as that which the majority of people are willing to walk to meet their daily needs. This distance is cited also in the Wokingham Highways guidance 'Living Streets'. Other than the Coombes Primary School, all local amenities in Barkham, Arborfield Cross and Arborfield Green are located in excess of 800m from the application site and, as mentioned, include sections of unlit roads and pathways. Consequently, its location cannot be considered sustainable from any relevant perspective.

2) Location in the countryside

Adopted Core Strategy Policy CP11 addresses proposals outside development limits, including those in the countryside. It is a generally restrictive policy, intended to protect the intrinsic quality of the natural environment and prevent coalescence of settlements but contains seven defined exception clauses. The proposals do not satisfy ANY of them.

In spatial terms, if approved, the proposals would encroach into the separation gap between Langley Common and the Arborfield Cross Limited Development Location and Conservation Area. The separation distances between the villages of Barkham and Arborfield are narrow already and development in this particular area would erode them further. The purpose of policy of CP11 is to help maintain the spatial characteristics which make individual settlements distinctive, whereas the proposals would diminish them. Adopted Core Strategy

policies CP9, CP17 and CP18 are pertinent also in this respect and, given that the proposals involve a quantum of development in excess of 25 residential units outside settlement boundaries (one of which is an LDL) and directly within the area specified in the policy map for CP18 (Appendix 1 further refers), the application is contrary to each.

3) Landscape

The Borough's Landscape Character Assessment defines landscape characteristics and sets out objectives and strategies for their management. The application site is located within LCA area J2, the strategy for which is to conserve and enhance the remaining rural character of the landscape. The key aspects to be conserved and enhanced are identified as the field pattern with mature hedgerow trees, wetland and woodland habitats, rural lanes and historic features. In terms of development, the aim stated is to integrate new development into its landscape setting, and retain the open and rural character of the landscape between settlements. Landscape Guidelines include: conserving woodlands, including ancient and remnant standard trees, and CONSERVING THE OPEN RURAL QUALITIES OF THE FARMED LANDSCAPE [my emphasis]. The proposals would not conserve or enhance anything but, instead, degrade the quality of the landscape and are therefore contrary to the objectives of the LCA for area J2.

As the proposals would alter fundamentally the character of the landscape between Langley Common and Arborfield Cross and result in the loss of a significant parcel of undeveloped land which defines the open quality of the local environment in this location, they would also be contrary to MDD Adopted Local Plan policies CC03 and TB21, and Adopted Core Strategy policies CP1 and CP3, plus CP11 (as mentioned previously).

A Stage 1 public examination of Wokingham BC's draft LPU was concluded in November 2025 and so it can be considered to be at a sufficiently advanced stage of progress for its policies to be given appropriate material weight by the LPA. Draft LPU policy NE5 addresses landscape and design matters, whilst draft policy NE6 defines Valued Landscapes and sets out their attributes, which must be taken into consideration when development is proposed within them. Paragraphs 14.57-14.60 of the LPU are also pertinent in this respect and, in particular, the second and third sentences of paragraph 14.60: 'Development proposals within OR OTHERWISE AFFECTING [my emphasis] valued landscapes must carefully consider and take account of the important landscape attributes and characteristics. Development will normally only be supported where these are protected.'

The application site is located adjacent to the Barkham and Bearwood Valued Landscape (L1) and thus its development would affect it. The Landscape Guidelines for L1 include: 'Conserve and enhance the wooded character of the landscape, manage the integration of new woodland using locally occurring native species. Conserve the rural character of the wooded landscapes. Limit unsympathetic changes of use within woodland to prevent the fragmentation of the homogenous areas of woodland. Maintain and enhance the character of rural and tree-lined byways and tracks, resisting unsympathetic highways improvements, infrastructure and signage. Use appropriate tree planting to help integrate roads.'

The proposals would introduce built form in proximity to a Valued Landscape. By its very nature, this would result in urbanisation and, thereby, loss and diminution of the prevailing landscape characteristics. As such, the proposals are contrary to draft LPU policy NE5 subsections (1) and (2), policy NE6 subsections

2(a), (b) and (g), plus subsection 3 of the latter, as they do not 'protect, integrate with and/or enhance the special features, characteristics or qualities of the landscape' they would affect.

4) Designated heritage asset

The application site is located in proximity to Langley Pond Farm, a Grade II listed heritage asset. This was a former royal hunting lodge when Barkham was part of Windsor Forest. Case law on the effects of development on the settings of listed heritage assets has established that direct inter-visibility between the two does not need to occur in order for harm to be caused. In this instance, however, inter-visibility DOES occur (especially in leaf-off conditions) and the combination of the quantum of development proposed and its proximity to the heritage asset would result in harm. Even should that harm be categorised as less-than-significant (in terms of the NPPF classification), it remains a material consideration weighing against the proposals.

Summary

All the matters I have mentioned in objection to the proposals have featured in several refused applications and dismissed appeals for the application site and others in proximity to it, including PAs 171186 (18 dwellings), 171597, (two dwellings), 172165 (70 dwellings), 180596 (120 dwellings), 203326 (commercial development) and 210777 (enforcement action). Whilst every planning application must be assessed on its own individual merits and disadvantages, planning history is capable of being a material consideration and it is my contention that the LPA should take this into consideration in this instance. The comprehensive Officer Report for PA 172165 is particularly pertinent. All of the factors involved in the determination of that application remain relevant to this one, the only difference between the two being the quantum of development proposed. To conclude, I believe that the proposals are inappropriate and would cause unacceptable harm in a sensitive rural setting, and urge that the application be refused.