

PLANNING REF : 243114
PROPERTY ADDRESS : Barkham
:
: RG41
SUBMITTED BY : Mr . King
DATE SUBMITTED : 03/01/2025

COMMENTS:

I disagree with aspects of this EIA application, namely:

It is important that the forthcoming Environmental Statement submitted as part of a future planning application for Barkham Square (to which this application is a prelude) encompasses what impact this major development site will have on the Barkham Brook, a priority habitat located only approximately 20 metres north of the site boundary, particularly given the fact that the water course which flows approximately NE through the centre of the development site joins this brook. Paragraph 2.6 of the phase 1 site appraisal desk-study conducted by GRM Development Solutions Ltd for the applicant identifies both this (on-site) water course and a drain (ditch) located in the NE quadrant of the site as being potential receptors for site-derived contamination and siltation (plus a pond located elsewhere) but omits the Barkham Brook itself as being a potential receptor. This is obviously the case and so this omission must be rectified.

Furthermore, as the site area exceeds one hectare, a flood risk assessment is required. For the reason mentioned, it is essential that the developer be required by the LPA to identify in the FRA and mitigate effectively any risks to the Barkham Brook specifically. This falls within EA Flood Zones 2 and 3, and is prone to flooding on a regular basis. The residential properties at Bridge Cottages have been affected by flooding in the past (for example, a significant event occurred in 2007) and so any such risk to them must not be permitted to increase as a consequence of the significant quantum of development proposed, given the underlying clay geology of the site and that surface-water run-off attributable to new roads and other hard surfacing on it would increase considerably, when compared to the natural attenuation provided currently by many hectares of undisturbed grassland.

A map depicting the Agricultural Land Classification of the site appears at figure 12.1 of Appendix G of the phase 1 site appraisal desk study report produced by GRM. It is not clear from where this has been sourced but it depicts the majority of the site to be ALC Grade 4 (that is, of poor quality). However, the definitive MAGIC map published by DEFRA does not show the site or adjacent areas to have been surveyed for ALC and the alternative official source of ALC mapping (Natural England) provides the caveat that those it publishes are intended for strategic planning purposes only and are not suitable for use below scale 1:250 000 or for the definitive classification of any local area or site. Furthermore, the description of the site as being of poor agricultural value does not correlate with my observed experience of it supporting the cultivation of a wide variety of crops for a period of time in excess of two decades. For these reasons, I challenge the assertion made in this regard.

The Landscape and Visual Impact Assessment (at Appendix 03 of the EIA Scoping Opinion Report produced for the applicant by Rapleys LLP) includes various views of the site from the surrounding public domain. The selection of some of these viewpoints is contentious. The photographs taken from viewpoint 1(c) on PRow BA7 is at a position where the site is screened from view by opaque netting or similar material affixed to the site boundary fence. Viewpoint 6 is taken from a position on the B3349 Barkham Road adjacent to the Barkham Bridge, at the lowest point AoD on that road, whereas other elevated sections along it provide clearer views of the development site.

Viewpoint 8 is located approximately 590 metres from the site in School Road, again at low elevation, where inter-visibility between the two points is bound to be poor because of the intervening landform and separation distance. As with viewpoint 6, a different location in School Road provides clearer views of the site, for example near its junction with Langley Common Road and Barkham Road. I suggest these views have been chosen in order to underplay the visual impacts of the proposed development on sensitive receptors who make use of these surrounding paths and, consequently, are not representative of the prevailing situation experienced by them (nor, indeed, that of residents living nearby).

I do not agree that the topics of built heritage and archaeology should be scoped out of the forthcoming Environmental Statement, as is suggested at paragraphs 6.5.9 and 6.6.0 of the Scoping Opinion Report by Rapleys LLP. The rationale for this is predominantly that affected listed heritage buildings and their settings and/or scheduled ancient monuments (such as the moated site at Church Cottages - NHLE ref.1013181) do not have direct inter-visibility with the development site. Not only is this incorrect in two instances [Barkham Square 'farmhouse' and the curtilage of Sparks Farm] but also disregards established planning case law that direct inter-visibility does not need to occur in order for the setting of a listed heritage asset to be harmed by development proposals. It further disregards the fact that harm can be caused by proposals that are not in proximity to a designated heritage asset, because its setting may extend and be experienced in the wider landscape, beyond its physical location and curtilage.