

PLANNING REF : 250517
PROPERTY ADDRESS : Suvikuja
: Basingstoke Road, Spencers Wood, Reading
: RG7 1PH
SUBMITTED BY : Prof R W Hoyle
DATE SUBMITTED : 01/05/2025

COMMENTS:

Application 250517. Land off Basingstoke Road, Spencers Wood (Body's Farm).

Whilst this is an outline access agreement, we also understand that aspects of the application will in effect be fixed should permission be granted at this stage and will be hard, if not impossible to amend at the reserved matters stage. For this reason a thorough assessment needs to be undertaken.

In general this application is far from welcome. Other than the specific issues I discuss below it will contribute greatly to the obblems of traffic on Basingstoke Road. Whilst the proposal is designed to be as saccharin as possible, doubtless to assuage local opinion (so public park, school, various facilities), these are not invariably the right baubles and one has to be sceptical as to whether they will ever come to pass. The application has a marked blindness to other issues and this submission outlines mitigations which are required should this scheme go forwards.

It should be noted that this site is not in either the current or the draft LPU. Awarding planning permission would leave me and many others wondering what the point of the LPU is. It contravenes WBC policy statements about building in the countryside. It is also in the DEPZ. Again, if this application is allowed, either on first application or on appeal, one will have to ask what the purpose of the DEPZ is.

These points should require WBC to reject the application on sight and we trust that they will do so. Given our local experience, we would also assume that it will be allowed on appeal despite the DEPZ.

Whilst it may be argued that the site is a natural extension to the built area of Spencers Wood, there is no connection to Spencers Wood. When the 1970s developments on the southern side of Hyde End Road were built, no allowance was made for further development to the south. All access to the projected estate is therefore from the west, from Basingstoke Road. (This has important implications as I will outline later.) There may be limited foot or cycle access out of the estate to the north (although this is partly based on demonstrably untrue premises) but all vehicle access will be via the Basingstoke Road through one of two entrances.

In short this is not an organic development of the existing settlement but is in effect isolated from the existing village. This isolation is emphasised by the provision of facilities which seem to make it self-contained. Indeed, in an earlier presentation to Shinfield Parish Council, there was a strong implication that this would be a gated community and that access to the emergency

facilities envisaged would in event of an alarm being sounded at AWE Burghfield would be limited to residents of the estate only. There appears to be some backtracking on this, but this the essential point is made: this is not going to be a part of Spencers Wood.

If we have to have it imposed on us in the face of local opposition, there are aspects of the application that are attractive. Chief of these is the provision of open space, but it should be noted that this will abut on the existing solar farm and the solar farm for which planning permission has now been granted. The southern boundary of the development will be the perimeter security fence of the solar farm.

In fact, the more I look at this proposal, the more I think that it is the wrong way round. The proposed open space should be to the north and act as a buffer between the existing houses (Larchside, Coronation Drive etc) and the new development. This would also have the advantage of minimising the risk of disturbance to the aviation fuel pipeline which crosses the north of the site. If it is unacceptable to have houses looking into the solar farms already built and envisaged, then I would suggest that the opportunity to build on this site has already been lost.

I note that there is no justification for the location of the park/SANG in the Design statement.

General points

(i) This is a wasteful proposal. Large areas are to be left undeveloped as parkland or SANG although I see nothing about the maintenance arrangements for them. The area devoted to housing is relatively small and much of the housing appears to be densely packed. It is also placed close to existing buildings. There needs to be clear separation between the existing houses on the northern and western side of the development and then new houses. The whole scheme should be shifted away from them (or redesigned as I said before).

(ii) Height. Elements of the development are three stories or higher, inappropriately high for an essentially rural development. The high buildings include the care home and the primary school. Both seem to me to be eminently impractical buildings. I am told that a three-story school flies in the face of good practice. Whilst I am very sceptical of the care home, there does not seem a good reason why the school cannot have a bigger footprint given the scale of the development and be an essentially one-story building.

It is also noticeable that the 2 and three-story buildings are close to the existing houses. This is simply unacceptable and frankly contemptuous of existing residents. We would welcome a planning condition that there will be no buildings higher than two stories,

There are no buildings higher than two stories south of Hyde End road and this should remain the case. If this development is to go ahead, it should sit low in the landscape and be concealed as far as possible. It needs to be pointed out that three story buildings with a southern aspect will have a rather charmless view of the solar farm. Conversely the development should be, as far as possible, invisible when seen from Swallowfield Park and the south.

(iii) There are two commercial developments in the scheme, a care home which seems particularly inappropriate in the DEPZ and a small industrial estate which seems to have no purpose other than to use up a small leftover area. Both these buildings are high: the commercial premises are to be up to 12 meters even though they are adjacent to the road and opposite existing commercial warehouses.

Warehousing, industrial shed on both sides of the road will create a canyon effect for drivers approaching the main entrance to the development (for which see later). There are no industrial-type buildings on the east side of the B3349 and we would wish that to remain the case.

(iv) Whilst there are a number of public facilities promised, one has to view these with scepticism. Will they ever be provided? Will, like many of the facilities promised elsewhere in Shinfield they be provided at the end of the project - and if money permits. We would want them provided at the beginning. For reasons I outline this is particularly the case with the projected primary school.

This scheme will serve to open up the area to the south of Spencers Wood to development. It is crucially important that the facilities included in this application should be of an adequate scale to provide other anticipated development, especially the projected primary school which I discuss further in a subsequent section.

(v) there are traffic issues to which the application is blind. Again I discuss these further below.

(vi) The whole site is in the DEPZ. Whilst there is a question as to whether this counts for anything, recent enquiries by the Planning Inspectorate having disregarded it, the attempt to grease AWE

Burghfield by providing facilities to be called on in the event of an emergency seem poorly thought through and perhaps contradict the essential principles of the DEPZ's planning: that people should stay put until told that they should leave the area. There are other elements of the scheme which fly in the face of the DEPZ.

Facilities

These are all designed to make the unpalatable a bit more acceptable: as Mary Poppins says, 'a spoonful of sugar ...'. But the more one looks at what is on offer, the more it unravels and the less satisfactory it looks.

A number of facilities are promised as a part of the scheme. These include a smallish shop and what is described as premises for a medical practice. There is also provision for a village hall or public room of some sort.

- The shop strikes us as too small to be really useful and should be more of a small supermarket. There are small shops already in the area - Budgen's in Three Miles Cross, The Post Office and Spencers Wood Stores (although the latter appears to be on its last legs again) and the Swallowfield Post Office. Another small shop would not make a useful contribution but would duplicate the rather scanty provision already available. We acknowledge that a larger store

might put one of more of the corner shops out of business.

- We understand that there have been conversations with the Swallowfield Medical Practice about the medical facility and the sum of their interest is having a consulting room. This appears to promise considerably less than it appears and it would be wrong to suppose that what is on offer here is a GP practice.

- There is a need for a community centre. It would be welcome if there was a building in the scheme for an pre-school or nursery. A public hall including a nursery might offer a use for the field against Basingstoke Road. One might also add that there is no site for a scout hut or youth and community activities in Spencers Wood.

- It might be added that there are no allotments in southern Spencers Wood and one would really like some factored into this scheme.

- School provision needs exploring at length. We concede that the developer's responsibility is limited to providing for their own development. However, the provisions of primary schools in the B3349 corridor is a complete mess and any new school here must be seen as serving a much wider area than just the present scheme.

At the moment there is no school serving the B3349 corridor except for Lambs Lane which is a small, one form entry school, in a variety of buildings but the earliest probably of pre-first world war vintage. There is no possibility of enlarging the school. As was demonstrated at the Trowes Lane (Swallowfield) Planning Enquiry last summer, there no school serving Swallowfield. As catchments are done on distance, Swallowfield is too far from Lambs Lane to secure places there for its children. It recruits entirely from within a tight catchment around the school. Swallowfield primary age children are therefore scattered between more distant schools.

The application appears to envisage that the projected school will serve the new development but that Lamb's Lane will also move to a new site, giving a two-form entry school. Logically Lambs Lane closes and moves as soon as soon as the Bodys Farm school is opened; it will

therefore have one form in all age groups from the beginning, but in reality one and a half forms from the beginning. The school will then need to accommodate the current unmet demand in Spencers Wood, Swallowfield and Riseley which easily amounts to a further form. There is then the question of the housing developments that we know are in the offing in Spencers Wood and Swallowfield. (I see that these have been conveniently listed by Mr Lias in his submission and so I do not recapitulate the figures here.) If this present application is successful, then the whole of the DEPZ will be open to development, and the Trowes Lane appeal has left the whole of Swallowfield and

Riseley at the mercy of developers. Hence in order to meet current and anticipated demand, the school needs to be a three-form entry school from the beginning.

In terms of phasing, given that there is no spare capacity in the neighbourhood, the school needs to be up and running before housebuilding starts on the Body's Farm development as there is nowhere for primary age children from that development to be educated.

Given it might not be the responsibility of the present developers to make provision for a school on this scale, WBC will have to make a very substantial contribution to the costs of the school. Given their settled policy of doing nothing to improve school provision in Spencers Wood despite demonstrated needs (see my comments to Planning Applications 241861 and 241862), one envisages that this will be a complete mess. If the school happens as envisaged, it

will be too small to meet local needs. At the very least a further area should be reserved within this scheme to allow expansion. Overall, and given that the school is envisaged as being three-story (which is simply not acceptable), a much larger area needs to be allocated for the school and its playing fields and, one might suggest, school parking. There are, of course, substantial doubts about the wisdom of having a new school in the DEPZ or whether it would be acceptable to ONR or AWE. Given the lack of local provision, a veto over the school by AWE is actually a veto over the whole scheme: it cannot be built without educational provision. I conclude that there needs to be a tightly-drawn S106 agreement to provide a school of an appropriate size (three-form entry), to be built at the beginning of the development and not at some future time and WBC should enforce the agreement to secure compliance. We would also envisage that Lambs Lane school would remain in educational use, probably as one of the growing network of SEND schools in the borough. There will be no windfall from the sale of the site to put towards the Body's Farm school.

We would wish these elements of the application to be sharpened up so they become realistic and meet local needs rather than being baubles which look attractive but are actually too slight to serve. We do not want to see the estate completed and then have to spend years arguing for an acceptable level of provision to be retro-fitted.

I do not regard the proposed care home as a local facility but as a commercial operation. But again, it is impossible to reconcile this aspect of the development with the DEPZ. It would not be possible to evacuate a care home in the eventuality that it was needed to do so. In the lockdown phase which we are told would proceed any instruction to evacuate, staff would be trapped in the home unable to end their shifts or for new staff to take over from them and there might well be problems in catering supplies reaching the home.

As for the industrial estate/warehousing that is proposed, there is no evidence in the application that the idea has been market tested and a need, or demand, established. After all, this will be the fourth industrial estate within about a mile. Instead both these aspects of the application look like elements that will be sold quickly by the developers as sites with planning permission to allow the applicants to take their profit. I have already said that the location and scale of this element of the development is inappropriate.

Transport and traffic

I think that the overall approach here is to produce something which looks plausible whilst reducing the likely costs to the developers. Again, I say that if this scheme goes forwards, it must cover the costs of the necessary improvements/mitigations. We cannot be placed in a position where we spend 20 years arguing that WBC should provide improvements which should have been a cost on Body's Farm's developers.

Pedestrian access/cycle routes.

First, there is no exit to the east, and there is no access to the

footpath between Hyde End Road. A footpath/cycle route to Hyde End Road via Sussex Lane is a considerable desiderata.

Second the access routes to Hyde End Road. These are presently muddy footpaths between overhanging trees. A durable surface would need to be laid and provision made for both its maintenance and periodic cutting back of foliage. I do not see this in the submitted documents. (It should be noted that these roads are not suitable for vehicle traffic no matter their legal status as BOATS.)

Third, access through the playground on Century Drive. We are not aware that any agreement has been secured from the landowner to do this. Frankly we think it inappropriate to have a passage of people and cycles through this space.

Fourth, access via Barracks Lane. This is a narrow one lane road with a blind curve on it which serves a handful of houses at the end of the road. The road is dangerous. It cannot take additional traffic. It is also in private possession and whilst the houses at the end of Barracks Lane have an easement over it, it cannot be assumed that the freeholder would extend the same rights to the residents of the new estate.

Vehicle access

All vehicle access is from Basingstoke Road. The traffic submission is sanguine about the additional traffic that the development will add to traffic going north towards J11 and the reverse. Suffice it to say that at peak hours, it is not unusual for the journey to J11 to take all or most of half an hour.

There will be a turn into the estate from just south of Body's Farm, but the major means of access/exit is envisaged as being over a new roundabout opposite the end of Lambs Lane. This is poorly sited. The approach to this junction from the south lacks acceptable sight lines: motorists coming from the south may well find themselves approaching a roundabout unawares until they are on it. The entrance into the estate needs moving northwards so there is a clear view of the roundabout from both directions.

The roundabout should also have a pelican crossing installed, not least for the use of family groups going from the estate to Lambs Lane school whilst it exists or in the longer term from the estates on Beech Hill Road to the new school on the Body's Farm development. This should be provided in parallel with the building of the school and should be in the S106 agreement.

Lambs Lane/Back Lane

A point that was made to the promoters of the scheme was that the location of the scheme will encourage the use of Back Lane and Whitehouse Lane as a back route to and from the A33. This gives access to Body's Farm from J11 without having to drive down Basingstoke Road. To get to J11, it may be found quicker to drive to the roundabout at the end of the dual carriageway and return northwards. This is a well known locally already. The route goes past Lambs Lane school where the 20 mph restriction is followed by some but not all cars, over Beechhill Road (a notorious location for traffic accidents and the down to the A33 along a single-track road without curbs or pavements.

The easiest solution might be to close this route after White House Farm, i.e. to stop access to/from the A33. It might also serve to close the road at Lambs Lane School so that access to the builder's yard and to Lambs Lane in the direction of Kingsbridge was only from Beechhill Road. If the road is to remain open, then the junction of Back Lane and Beechhill Road needs to be remodelled. This is locally notorious as an accident black spot.

All these alterations/improvements need to be a charge on the developers through S106.

If there is any grant of planning permission, then there should be a condition that no constriction traffic uses either the A33 junction to come down White House Lane, or traverses Back Lane.

Parking

It does not appear that the parking within the estate is anywhere like sufficient. It is visibly inadequate for the school, the proposed civic centre, the care home and visitors to the park. This all needs reconsidering from first principles.

Bus access

There has been a failure to think about this. There are other instances where it has been assumed that buses and coaches will merely run on conventional roads although these turn out to be narrower than envisaged due to parking on one or both sides. There needs to be provision for coach access to the school and care home. I would also suggest that there is a bus turning circle incorporated into the scheme so that buses from Reading can turn and then return to Reading (see my comments on public transport which follow).

Public transport.

The transport statement vastly overstates the availability of public transport. There is an hourly bus service via MereOak Park and Ride which takes 28 or 32 minutes from Spencers Wood PO to St Mary's Butts according to the time of day (add five minutes to continue to Reading station. These times are hopeful rather than realistic.). Realistically the journey time from Body's Farm would be a little short of 40 minutes to do 4 miles. There is no Sunday service and the recent policy statement from WBC suggests that there is no intention of reinstating one, which would in turn depend on Reading Bus deciding to run Sunday services to MereOak.

This falls short of an acceptable service as laid down in WBC's own documents (CP6).

Following local precedent, there should be a considerable injection of cash into this service via an S106 agreement. Provision should also be made for a turning circle so that an augmented service running every half hour can return to Reading from Body's Farm, the S106 service on the other half hour continuing to Riseley as at present.

Commercial traffic

The proposed industrial estate/warehousing will create additional large vehicle traffic, the nature of which cannot be anticipated

until more is known about the nature of the development. This is perhaps why there appears to be no assessment of it in the Transport Statement.

Archaeology

The Archaeological Assessment does not know that there are persistent reports locally of a tessellated pavement being found in sewage works to the south of Body's Farm, close to or under the hard standing or the extensive area of bramble, roughly where the northern entry to the development is proposed. From what I have been told it should be possible to limit the location. This needs to be explored before any work on the development starts.

DEPZ

Of course, the whole site lies in the DEPZ and for that reason alone should not be permitted to go forwards. However, we also know that developers win the right to build within the DEPZ on appeal. The Planning Inspectorate plainly regards the DEPZ as being a restraint which they are entitled to ignore.

The first point to make here is that the only means of entry and existing the Body's Farm development is by going deeper into the DEPZ towards Burghfield. In the event of an order being given to evacuate the DEPZ or parts of it, Body's Farm will contribute to the clogging of the B3349.

However, Richborough have brought forwards plans for using the school and other 'public buildings' as a disaster emergency centre (Design Statement, pp. 118-19). One would like to know what AWE make of this, and whether these plans have been drawn with their assistance or knowledge. But overall, this does seem like another instance of overegging the application to grease its passage through the planning process - with such generosity and forethought, who could possibly complain about the proposal? Well, me for one.

The instructions offered to residents in the event of an emergency being declared are two-fold: to remain indoors until an order to the contrary comes. My first point here is that I note that there is no space provided to stockpile equipment or any pharmaceuticals which might be necessary, so all that is being offered by the developers are multi-use spaces which might be converted if an emergency was called. The second point is that having looked at the details, one wonders whether what is envisaged here is really congruent with what one has been told about the emergency strategy.

The fact remains that the development is in the DEPZ and with only one means of access, any evacuation will have to be into the DEPZ. That the developers have factored into the proposal some ideas about how their buildings might be used in the event of an emergency being declared is neither here nor there, and should not encourage AWE to drop their objections to the overall scheme.

If the scheme goes to appeal one looks forward to the developer's

counsel trashing the DEPZ whilst explaining why they have been so accommodating to it here.

Consultation

I was present at the Richborough presentation to Shinfield Parish Council on 26 February 2024. This was notable for a member of the Richborough team denying what we all knew to be the case, the additional solar farm.

It should be noted that two important elements were added to the scheme after this meeting, the care home and the commercial space. Neither of these were communicated to SPC. It is perhaps more significant that they subsequently rowed back on their plans for mitigating the DEPZ by closing the estate to outsiders should an emergency be declared.

Notice of the public consultation was not notified to residents in the roads to the north of the development site.

It is hard to see any positive changes in the proposals that were incorporated as a result of the two consultations.

Errors

There are multiple errors of fact in the documents as well as inconsistencies. (For the latter see, for instance, the projected primary school is generally reported to be two Form Entry (Design statement, pp. 1, 41, 50, 51, 58) but reduced to a one FE school on p. 41 and on p. 120, in the summary, it is 'A new primary school with land for future expansion'.)

I draw attention to just two outright errors.

Despite the statement to the contrary, there is a Shinfield neighbourhood plan. The present proposal is not congruent with the plan

Second, there is no realistic prospect of a Spencers Wood shopping centre. The landowner will not sell. There is no funding. There is no design. It is a pipedream. If this application goes ahead, then it will certainly not happen.