

PLANNING REF : 242654
PROPERTY ADDRESS : Two Hoots
: 51 Reeves Way, Wokingham, Berkshire
: RG41 2PS
SUBMITTED BY : Mr Robert Hughes
DATE SUBMITTED : 24/11/2024

COMMENTS:

I object most strongly to numerous details in planning application 242654 - Land west of Limmerhill Road.

I most strongly object to the fact that a proposed vehicular access is shown roughly south-to-northwest on the plan indicating access to the land that was REFUSED planning application under planning application 232621 during 2024 (Refused 30th August 2024).

The un-necessary hard access road surface is detrimental to the ecology and wildlife of the area by needless digging up and disturbance to the natural environment here. It is unplanned and outside of permitted development limits and contrary to spatial objectives of the development plan and to Policies CP1, CP3, CP6, CP9, CP11 and CP17 of the Core Strategy, Policies CC01, CC02, CC03 and TB21 of the MDD Local Plan, the Borough Design Guide SPD and sections 2, 4, 12 and 15 of the NPPF.

I feel it is crucial to preserve the Wokingham-Barkham settlement gap as a green wedge. This access road to a parcel of land, which has repeatedly been refused for development, is crucial for maintaining the distinct character of our communities and this element should be refused again. The proposed access road will have a negative and detrimental impact on the landscape and character & appearance of the area should a new development be applied for by reason of the loss of a sizeable section of open and attractive undulating landscape in the countryside with an urbanising large-scale development contrary to policies CP1, CP3 and CP11 of the Core Strategy, Policies CC01, CC02, CC03 and TB21 of the MDD Local Plan, the Borough Design Guide SPD, the Wokingham District Landscape Character Assessment and sections 12 and 15 of the NPPF.

Should the proposed access road be granted permission by way of accepting this proposal, it will give the impression that future planning applications proposed developments on the land at the rear might be expected. This contravenes the basis of the REFUSAL NOTICE on 232621. It could significantly and prominently erode the last remaining open space that separates Wokingham and Barkham, resulting in a detrimental degree of visual and perceived coalescence between these independent settlements, contrary to policies CP1, CP3 and CP11 of the Core Strategy, Policies CC01, CC02, CC03 and TB21 of the MDD Local Plan, the Borough Design Guide SPD, the Wokingham District Landscape Character Assessment and sections 12 and 15 of the NPPF.

I most strongly believe we should make every endeavor to protect our special natural environments and all the important species living within. The fields behind the site where the development is proposed joins with Fox Hill and both are home to diverse wildlife and vegetation, vital for our local ecosystem's health.

Developments built outside of LPA plans, guidelines and draft plans

have major adverse impacts well beyond the immediate vicinity. Increased traffic and safety concerns on Barkham Road affect everyone who walks, cycles and drives on the route, not just those living nearby. Allowing this proposed access road could lead to a new development using access through the site along the proposed new access road and would increase the risk of accidents to pedestrians, cyclists and other road users due to the nature of the road where development access is sought.

I strongly object to the loss of yet more flora and fauna. Once developed, this green space is gone forever, impacting our community's overall quality of life, including air quality, right to fresh air and open space. Making building on our green spaces easier means that instead of strolling through a rural area, taking in the sounds and smells of the countryside along Limmerhill Lane, we would instead be hit with a walk in an urban area including all its traffic issues such as; danger of accidents and all manner of pollutants to light, air and sound.

Where is the document to show that the local area needs more overnight accommodation. From the information I have gathered there is a surplus of places to stay in Wokingham, especially as there is now a new hotel (Premier Inn, Wellington Road) and the fact that both the Pheasant Pub and Edward Court hotel have closed)

If, as the developers suggests, they are merely moving the 'field-access' to be combined with access to the Leathern Bottel pub, then this is also moving the access to the field(s) to a more dangerous location on the Barkham Road. The existing access to the field(s) is clearly in a safer location slightly away from the dangerous bends and blind brow of hill. The proposed development would have a detrimental impact on the character and appearance of the local area and countryside by reason of the creation of a new two-way carriageway into an open field already served by another functional access.

This application must be considered in conjunction with another live planning application, that of Land at Blagrove Lane, planning application number 222306 and must be considered at Committee level not by delegated planning officer, since both of the applications have numerous critical effects, especially the detrimental effect on the Green Separation Gap between Wokingham and Barkham.

Parts of this development are contrary to policies CP1, CP3 and CP11 of the Core Strategy, Policies CC01, CC02, CC03 and TB21 of the MDD Local Plan, the Borough Design Guide SPD, The National Design Guide and sections 12 and 15 of the NPPF.

Sometime shortly before June 2023 a number of mature trees were felled around these boundaries without a good reason for doing so. (8 Photos attached: IMG_7279-86). At least one of these were thought to be over 300 years old. The biodiversity loss of mature and veteran trees can not be regained merely by planting a few new saplings. It takes generations of growth for these to be replaced. Extract follows from EDVTA (Wokingham District Veteran Tree Association) .On June 27th

two trees on the verge of Barkham Road outside the Leathern Bottel pub in Wokingham were felled and we have had several emails and contacts from members and local residents about the loss of these two highly visible and valued amenity trees. In addition on May 9th, three oak trees in the field behind the Leathern Bottel car park were felled. Four of these 5 felled trees were recorded on our database (trees numbered MRN3206, MRN3207, MRN3208 and MRN3209).
End of extract.

NPPF

The National Planning Policy Framework states there should be Net Gain for biodiversity and this does not seem to be the case here due to the felling of a variety of mature tree species even before the plans were submitted. In my view, the developer should be required to retain more of the existing vegetation and habitats within the boundary of the proposed application, rather than just mitigation in development

documents, particularly when considering the older and more significantly located trees. Bearing in mind that numerous important trees have already gone, it is not acceptable practice to exchange any more mature tree for young trees in the belief this will fully compensate. It takes at least ONE human generation (15-20 years) before a new tree offers anything like the benefit of a lost tree. I also believe there should be more spaces for plants and pollinators within the site.

Social Impact and Sustainable Environments:

I believe biodiversity proposals must consider the wider environment and not just locally within a project. I would like to see the practice of a circular biodiversity economy which keeps existing resources in use, extracting the maximum value from them throughout their lives. The developer should source products and materials that divert waste from landfill or have reputable sustainability certification; this can reduce the ecological impact of development on a wider scale. This also applies to natural 'waste' material. Where the argument to remove vegetation has been made, developers should aim to retain biodiversity value by keeping as much on site as possible. Examples of natural material that can be repurposed:

Lifted Turf

Pile rolled turf in a corner where they make an excellent insect or hedgehog hotel

Alternatively, roll them out and let it degrade naturally in a designated place.

Stones, bricks and gravel

Create small mounds of pebbles or dig trenches and fill with stones. These will be used by beetles, spiders and other insects.

Re-use in ponds and rainwater gardens

Trees

Dead trees with no structural problems can be left standing to encourage habitation by insects and birds such as woodpeckers or owls.

Logs and vegetation

Can be used for decoration, seating or for mulching down as compost. Holes can be drilled into logs and left in the sun as homes for

bees.

Connectivity

Regardless of whether an animal is aerial, terrestrial or aquatic, it is essential that habitats remain connected to allow freedom of movement. This will enable species to find what they need to survive - which can include each other. Green wedges or corridors can be natural formations such as trees, shrubs, hedgerows and rivers, but should also be mandatory at the start of the project. I request green wildlife culverts under ALL roadways and pathways, where creatures can pass safely irrespective of people and traffic. This will help to allow wildlife to pass between the green spaces of Fox Hill, to the north of the site and the LWS (designated Local Wildlife Site) of

Bottel Copse on the south-side of Barkham Road. Since there are numerous notable wildlife habitats and species in the area, it is exactly these species and environments that must be considered valuable and be protected for their survival and the benefit of those who come after us.

Built-in (integral) features for wildlife i.e bird nest bricks and bat houses, should be included into all new builds;

- Built-in nest / roosting bricks last the lifetime of the building
- Integral nest / roosting bricks should not completely replace boxes on trees

Bats

Best practice for bat habitats requires management of woodland, especially identifying replacements well before existing trees collapse. These procedures need to be included in the conditions should the application be successful. This is only one aspect of proper management for bats, please refer to guideline_draft_v07.indd (forestresearch.gov.uk) for full details.

<https://cdn.forestresearch.gov.uk/2005/01/fcfc212.pdf>

I would like to point out how unfair the process is for residents and other parties to comment on planning applications such as these for any size of development. We only get a very short time (invariably less than a month) to comments on dozens or hundreds of highly technical documents, some of which can be 180+ pages (250 pages/plans in this case. Interested parties should be allowed more time to create meaningful comments on the planning application in question. We await your comments on these points.

Appendix 1. Refusal notice from WBC re:232621, 30th August 2024.

TOWN AND COUNTRY PLANNING ACTS TOWN AND COUNTRY PLANNING (ENGLAND)
1990

Monopro Ltd C/O Pegasus Planning Group Ltd, First Floor, South Wing,
Equinox North, Great Park Road, Almondsbury BRISTOL BS32 4QL

NOTIFICATION OF REFUSAL OF PLANNING PERMISSION

Application Number: 232621

Applicant Name: Monopro Ltd

Site Address: Land west of Limmerhill Road, Wokingham.

Proposal: Outline Planning Application for up to 60 No. dwellings including age-restricted housing for older people with associated public open space, landscaping, ecological enhancements, drainage and other supporting infrastructure, with access from Barkham Road. Means of Access to be considered (with Appearance, landscaping, Layout and Scale to be reserved).

Date of Decision: 30 August 2024

Wokingham Borough Council in pursuance of its powers under the above Acts and Regulations hereby REFUSES permission for the above development the reasons for which are specified hereunder.

Reasons;

Principle of development

1. The proposal represents inappropriate unplanned development outside of development limits within the countryside that is contrary to the spatial objectives of the development plan and to Policies CP1, CP3, CP6, CP9, CP11 and CP17 of the Core Strategy, Policies CC01, CC02, CC03 and TB21 of the MDD Local Plan, the Borough Design Guide SPD and sections 2, 4, 12 and 15 of the NPPF.

Layout and design

2. The proposed quantum of development within the parameters submitted for approval and access road would result in a cramped and a poorly laid out scheme which has not been demonstrated to achieve minimum separation distances or adequate private amenity space and would introduce conflicts between private gardens and public spaces. The road layout and parameters for development would result in a fragmented pattern of development with streets that have poor passive surveillance and a decoupled access road that does not create a legible or integrated street network with the existing settlement pattern. The development is contrary to policies CP1, CP3 and CP11 of the Core Strategy, Policies CC01, CC02, CC03 and TB21 of the MDD Local Plan, the Borough Design Guide SPD, The National Design Guide and sections 12 and 15 of the NPPF.

Impact on the landscape and countryside

3. The proposed development will have a prominent negative and detrimental impact on the landscape and character & appearance of the area by reason of the loss of a sizeable section of open and attractive undulating landscape in the countryside with an urbanising large-scale development contrary to policies CP1, CP3 and CP11 of the Core Strategy, Policies CC01, CC02, CC03 and TB21 of the MDD Local Plan, , the Borough Design Guide SPD, the Wokingham District Landscape Character Assessment and sections 12 and 15 of the NPPF.

Erosion of separation between settlements

4. The proposed development would significantly and prominently

erode the last remaining open space that separates Wokingham and Barkham, resulting in a detrimental degree of visual and perceived coalescence between these independent settlements, contrary to policies CP1, CP3 and CP11 of the Core Strategy, Policies CC01, CC02, CC03 and TB21 of the MDD Local Plan, the Borough Design Guide SPD, the Wokingham District Landscape Character Assessment and sections 12 and 15 of the NPPF

Best and Most Versatile Agricultural Land

5. The agricultural land is classed as Grade 3 and the application fails to demonstrate there would be no loss of Grade 3a Best and Most Versatile agricultural Land, or that such a loss would be outweighed by other material considerations, contrary to Core Strategy policy CP1 and section 15 of the NPPF.

Unsustainable Location

6. The application site is within an unsustainable location that would not encourage a modal shift towards sustainable modes of transport, by reason of the countryside location outside of settlement limits, distances to facilities and services, suboptimal public transport links and poor quality of the walking/cycling environment, contrary to Policies CP1, CP2, CP3, CP6 and CP11 of the Core Strategy, Policies CC01 and CC02 of the MDD Local Plan, the Borough Design Guide SPD and section 8 & 9 of the NPPF.

Biodiversity Impact

7. The application fails to consider biodiversity degradation on the site in the form of felling two Veteran Trees, which are irreplaceable habitat. The development is contrary to Core Strategy Policy CP7, MDD Local Plan Policy TB23 and Section 15 of the NPPF.

Thames Basin Heaths SPA

8. In the absence of a planning obligation to secure suitable avoidance and mitigation measures and access management monitoring arrangements, in terms that are satisfactory to the Local Planning Authority (LPA), the LPA is unable to satisfy itself that the proposals include adequate mitigation measures to prevent the proposed development from having an adverse effect on the integrity of the Thames Basin Heaths SPA, in line with the requirements of Regulation 63 of the Conservation of Habitats and Species Regulations 2017 as amended and Article 6(3) of Directive 92/43/EEC. The proposal would be contrary to Policy NRM6 of the South East Plan, Policies CP8 and CP4 of the Core Strategy.

Employment Skills Plan

9. In the absence of a completed legal agreement, the proposal fails to secure opportunities for training, apprenticeships and other vocational initiatives to develop local employability skills contrary to MDD Policy TB12.

Affordable Housing

10. In the absence of a completed Legal Agreement, the scheme fails to make adequate provision for affordable housing, contrary to Policy CP5 of the Core Strategy and Section 6 of the NPPF.

Signed Marcia Head Head of Development Management - Place & Growth
Date: 30 August 2024.

