

PLANNING REF : 241567
PROPERTY ADDRESS : Stables
: Croft Road, Shinfield, Stables, Croft Shinfield, Reading, Ber
: RG2 9EY
SUBMITTED BY : Mrs Sara GALLAGHER
DATE SUBMITTED : 31/07/2024

COMMENTS:

I believe that this application does not comply with any local, regional or national planning policy. While I understand that houses need to be built in the region. It is impossible to provide the numbers required without allocating a small number of large areas of countryside to carry these numbers. Multiple, small, random developments scattered around the area will simply not meet the numbers demanded. Nor will these fund the additional infrastructure needed to service the numbers eg schools, healthcare, retail and employment - hence the importance of carefully & rigorously-constructed Policies to guide such development.

Wokingham Borough Council currently have a temporary shortfall on the 5 year housing supply. This is not through lack of planning however, it is due solely to the unforeseen and unavoidable extension of the Aldermaston Weapons Establishment (AWE) exclusion area. Up until this point, Wokingham BC had actually been over-delivering on its housing numbers. WBC must therefore be given reasonable time to mitigate against this shortfall outside of their control. Indeed, at the time of writing, outline permission has just been granted for 1,500 new houses in the South Wokingham SDL - which is two years' supply alone for the district and more than covers the temporary shortfall. The following are already scheduled to be built in Finchampstead within the Plan period:

- 1,500 houses in Finchwood Park
- 250 houses in Arborfield Green which are within the Finchampstead Boundary
- 80 additional houses arising from the Gorse Ride/Arnett Avenue redevelopment

This application however does not comply with Wokingham Borough Council Core Policies CP1, CP3, CP4, CP6 or CP9. In particular, the proposal cites CP9 as an exception allowing development of affordable housing outside of development limits. This is a Rural Exception provision, to support rural communities. However, as there is no source of local employment at this location, and no local facilities or services, there are therefore no options other than to travel by car. The application will not provide housing options for rural communities but will instead constitute a location for commuting into larger nearby towns & cities.

The new Finchampstead Neighbourhood Development Plan followed a particularly proactive, rigorous and robust process, and involved multiple public consultations. It was deemed fit for purpose and compliant with all guidelines by an Independent Examiner. An over-whelming 90% voted to adopt it public referendum in September 2023. As such, it is the most current and relevant policy for assessing any planning application against in this area.

Much is made in the application of the relatively high proportion of

Affordable houses being proposed. It is noted that the previous application in 2017 from the same land promoter, Catesby, and the same landowner, proposed a far lower number - just 16 rather than the 28 proposed this time round. The reason for this is the recognised and growing trend (ref: Shelter, CPRE, etc) for land promoters such as Catesby to use Viability Assessments as a negotiating tool to reduce the number of Affordable houses when selling on the land to the subsequent developer in order to maximise profits. Last year, 79% of affordable homes required by local policies were lost due to the use of Viability Assessments. The site as a whole is too small for Registered Providers to be able to afford to take on. As pointed out by the multitude of other Objections to this application, the site itself is already designated by all relevant authorities as unsuitable for housing development, and also especially unsustainable for Affordable housing in particular, due to the total lack of facilities and infrastructure. It must therefore be assumed that, should permission be granted, the actual number of affordable houses developed will be greatly reduced or even eradicated in reality. The overall number of houses proposed (40), is far too dense for this site in any case, but a smaller number of houses that may possibly be proposed on appeal would be even less viable for any developer, so any future, modified applications must also be rejected on this basis alone.

In conclusion, unfortunately no credence can be given to the "Affordable" aspect of the application.

Finchampstead Parish Council have formally objected, in detail to this application. This application directly conflicts with all the FNDP policies listed below:

- Policy GA1 - Improve environment and health from traffic pollution. There are no pavements or cycle ways along any road in or out of the village. Several of the roads are single track, without even a verge to safely walk upon, with a 60mph national speed limit. Several of the roads are hilly with blind bends and identified pinch points.

They are only navigable by the most accomplished cyclists and suitable for school children or the average leisure cyclist. There is no public transport - either buses or trains. All journeys to service the most basic of life's necessities - shopping, getting to work, getting to school, would therefore need to be by car.

- Policy IRS2 - Protection of Outstanding Views.

The site forms part of the site lies well within the view 'cone' of Outstanding View B specifically mentioned in the FNDP, which 'Looks South over the Manor Farms to the Blackwater Valley and on to distant Blackbush and Hogs Back upland areas'. The meadow land around the Blackwater valley is an integral part of this view and this development would be a clear intrusion into this view.

- Policy IRS4 - Implement strategy to preserve the identity of Finchampstead Parish through informal green spaces.

The site is outside of the defined settlement boundary, and forms part of the useful green & biodiverse buffer between the Village

and the neighbouring village of Eversley. The development would have an urbanizing affect, and damage the rural character of the Village. The site is immediately adjacent to the new conservation area which were the Cemex quarries. This area is currently in the process of being restored with restricted areas for protected ground-nesting and migratory birds. The 40 house development will result in light & noise pollution to the conservation area, along with ingress by dogs & cats into the protected areas.

- Policy IRS5 - Ecologically important areas and Biodiversity. The site is currently biodiverse, with numerous recorded protected species such as 8 species of bats, a badger sett, nesting barn owls, lapwings, slow worms & other reptiles - and the all the associated ecosystem that supports these species. The application also acknowledges that the reclaimed quarries/lakes/conservation area immediately adjacent is now suitable for great crested newts. It was extremely disappointing to witness the destruction of these defined habitats just prior to the surveys and application, for example by grubbing out & eradicating the hedgerow on the north side of the field on Public Footpath #13 which is where the slow-worm population is known to be located, and repeatedly entering the area where the badger sett is located and the adjoining area where the ground-nesting birds are located, with dogs (footage available).

- Policy GA2 - Reduction in car usage with safe personal mobility options.

My own house, along with a dozen others, sits on Public Footpath 13 which runs along the north edge of the field and through my front garden. It is very popular with hikers and dog walkers, and enjoys the extensive "Outstanding View B" across the protected Thames Basin, and would be reduced to simply an urban alleyway between 2 rows of houses. Public Footpath #54 runs to the south along the Blackwater River and is part of the longer Blackwater Valley Path hiking trail. This urbanisation of the proposed development would block & destroy the view from this very well-known trail.

- Policy AHD1 - Development within Development Limits

The application is for a site outside of existing Development Locations and the nearest of those is listed as suitable for only 'Limited Development'. Other, more suitable locations are already approved and the numbers of planned new houses are far in excess of any identified local housing need within Finchampstead Parish. Other potential locations, including this specific application's site were evaluated and dismissed as unsuitable as part of the FNDP process. In addition to reasons set out above, it was found that the remote location of this site, on the extreme edge of the borough of Wokingham, would be of no value in meeting any housing need from other parts of the borough.

The site is wholly unsuitable for any development, for the following reasons:

- The density and style of housing conflicts with the existing Village development. Nowhere else in the Village is there such dense housing, so this would have an urbanizing affect on this designated countryside, and harm the rural character of the Village. Our own house directly abutting the site is a small, single storey bungalow. A dense 2 storey development on our doorstep would block the light coming from the south, be completely over-bearing and overlook our

lounge and bedroom, resulting in a complete lack of privacy. The proposal states that considerable massing & 1.8m fencing for the new properties would be required - which would prove even more over-bearing to the existing residences adjoining the site, and harm to the "Outstanding View B" previously highlighted from Public Footpath #13, which will become just a suburban alleyway between two rows of houses.

- The resulting noise (it should be noted a stage 2 noise risk assessment has not been carried out) and light pollution would greatly damage our quality of life and mental health. No consideration has been given to the noise pollution on the existing dozen or so existing dwellings which overlook the site. Indeed, we existing residents are merely dismissed with the statement: "Gardens located further into the site, and away from Longwater Road (B3106), will be screened by intervening buildings, therefore the orientation of these will need less careful consideration." Air source heat pumps each operating at 50-70dB, and even a wind turbine (all other heating systems are discounted in the application as the ground is not suitable for ground source pumps or even mains gas) will also be intrusive for the existing residents.

- The development would have street lighting, which is not found elsewhere in the village. This is an intrinsically dark landscape, which must be preserved as dictated in the National Planning Policy Framework. The light pollution would disturb the privacy of us and our neighbours alongside the field, and have a harmful affect on the nocturnal life in the area, such as the nesting barn owls, badgers and 8 bat species recorded by the ecological surveys. Photographs & video submitted. Bats are confirmed in the surveys as roosting in trees proposed to be felled as part of the roadside hedgerow clearance.

- The site is at the bottom of the hill, and is adjacent to the flooded Cemex lakes. The water table is therefore very high here in this lowland area, and the whole surrounding area is traditionally boggy. Even in the drought of 2022, the bottom half of the field was bright green, whereas everywhere else was brown & dead (photographic evidence submitted). We cannot walk on our lawn for at least 4 months of every year without boots. There are numerous springs in the area, all eventually draining down the hill, both above & below ground, through this field and in to the lakes and Blackwater River alongside the site. The application acknowledges that extra deep foundations will be required and that further investigation is required. The Flood Risk Assessment is years out of date, and particularly with some of the Cemex lakes recently being infilled to form reed beds, and the subsequent removal of the bund which protected the field from when the river floods at least a couple of times a year, there is a very large question mark as to whether the field is now EA Flood Risk 2&3 instead of 1&2. The diagrams submitted accompanying the surveys clearly show how the bund retained the water from the south side of the field - but this bund has now been removed by Cemex as part of the restoration works carried out in constructing the new nature reserve. The information provided with the application is taken from 2009. There has been no new analysis of water levels since the Cemex lakes were infilled - these lakes until very recently would have

held

millions of gallons of water, which will now be displaced - but to where? Photographic evidence from local residents show extensive flooding both surrounding and within this site. Commercial agriculture on this site was wound down after tractors remained stuck in the south of this field for months on end over winter. Other photographs accompanying this objection show a supermarket delivery truck stuck in the waterlogged ground outside our front door which is on the site boundary - this was in August, not winter!!! Our own

house, a single storey bungalow, has apparently been underpinned, as have many others near the site, and cracking from ground movement can be seen in our own and neighbouring houses in Woodmoor. That the

geology is soft, variable strata and shrinkable clay is highlighted in the application. This movement is acknowledged in the application. This whole issue will only get worse with climate change, not better. There cannot possibly be any question of permitting development here until these questions around these new, dynamic conditions have been resolved. The proposal is to just drain water from the site - which, with 40 houses & 80-100 cars will be filthy - directly into the neighbouring watercourse which is in the new conservation area! This feeds directly into the Blackwater River just 100m away. Discussions with insurance experts therefore indicate any houses would be uninsurable.

- The local sewage pumping station is adjacent to the site and on the adjacent Blackwater River, and is at capacity. Unfortunately there are repeated discharges of raw sewage into the Blackwater River.

This year, there was national publicity about anglers on the Blackwater in this area catching e-coli. Thames Water have already stated back in 2017 that the pumping station would most likely need to be upgraded. There is no physical space at this site to extend it, and there has been no agreement from Thames Water to upgrade it in any case.

- What local services exist are already at capacity, and therefore cannot support further expansion. The NHS Primary Care network responsible for Finchampstead, Arborfield, and Swallowfield stated in a recent application that it is already at full capacity. There are no secondary schools within miles. The local infants & junior school is generally over-subscribed, meaning children would need to be driven to other schools outside of the catchment area. There are no shops which can be walked to from here. There are no local employment opportunities - any employment must be reached by car, as there is no public transport. Wokingham District already has just about the highest degree of car ownership in the country - this development will make that even worse, instead of better.

- The field and adjoining nature reserve form a green buffer between Finchampstead Village and Eversley Cross. Urbanising the field which will also detrimentally affect the nature reserve will cause irreparable harm, and the green buffer must be preserved to prevent infill between these settlements.

- No mitigation has been proposed to deal with increased risk to pedestrians at the new junction to the development. Footpath #13 is right on this proposed opening, and crosses Longwater Road to the allotments. The speed limit transitions from 30mph to 60mph at this point, and there is actually frequent speeding along this stretch of straight road to Eversley Cross. The police visit every 6 weeks to monitor & regulate speeding already; an additional 80-100 cars from the proposed site will only increase these dangers.

- Archaeological survey - there is evidence of continued occupation and transit for thousands of years at this site - neolithic, Mesolithic, iron age, Roman, mediaeval etc. It is stated that the assemblage is of local and, possibly, of regional importance, and requires further investigation. Permission cannot be granted until this outstanding work is concluded satisfactorily.

- The site overlooks the new Cemex conservation area and existing Moor Green Nature Reserve, also owned by Cemex. Should Cemex wish to sell it this may no longer be possible - the area is at risk as associations such as RSPB may deem it impossible to protect birds if the adjoining area overlooking it is developed for housing. Birds are likely to leave the area. Therefore no option will exist to encourage rare birds such as bitterns to return after the years of quarrying. It is an area of peace & tranquillity for all to enjoy that has been given back to nature that should not be taken away again .

- The whole site is in the protected "Outstanding view B", stretching across the Thames Basin Heaths. The Blackwater River running to the south of the site feeds into the River Loddon (which used to be so clean it was my childhood swimming "pool", and full of freshwater mussels!). Both the Blackwater Valley and the Loddon Valley are also in the highest Landscape Character category. This area was classified under the European Community Directive on Wild Birds to protect internationally important bird species on 9 March 2005 for the populations of three Annex 1 bird species - Nightjar, Woodlark and Dartford Warbler. Urban construction will damage these habitats and harm the overall character, and cannot therefore be permitted here.

In conclusion, it is difficult to find a single (if any) positive aspect to this application. I respectfully urge that this application is rejected as soon as possible, and save, as far as possible, tying up the limited resources of the Council and our taxpayers' money - as well as the extreme distress caused upon the existing residents that this ill-formed application has caused.