

PA 261059 – Land south of Langley Common Road at Barkham Square, Barkham

Submitted by: R King
Address: Barkham RG41
Date Submitted: 03.07.2026

Comments:

For accuracy, please note that the address cited for this application on the planning portal is incorrect. The land falls entirely within the civil parish of Barkham. Arborfield Green is not a village (as the address cited would suggest) but a housing development, the major proportion of which is also located within the same parish. The address I have given above is therefore more accurate.

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

1) Prematurity

The application is predicated on the adoption of policy SS11 in WBC's draft Local Plan Update (LPU). That policy, along with all the others contained within it, has not yet found to be legal and sound because the LPU examination process by the Planning Inspectorate has not yet concluded (although the evidence hearings have). Consequently, draft policy SS11 can only be afforded nil or limited weight in the determination of the application. Furthermore, the latest iteration of the National Planning Policy Framework has not yet been published, following consultation in late 2025, and so the 2024 version remains extant. Unless and until those two factors change, it must be determined in accordance with the policies in the existing development plan, as engaged, and to which it is contrary. I will address some of them later.

2) Bias and predetermination

The site is promoted by its developer and the LPA as part of the LPU. Given this, it is not clear how an objective decision can be made by the LPA when there are no control measures in place to avoid the risk of bias or predetermination from occurring (such as referring the determination process to a neighbouring LPA or requesting that the application be called-in by the MHCLG for determination by the Secretary of State). Planning law is explicit on the need to eliminate bias and predetermination (the primary authority being *R (Lewis) v Persimmon Homes Teeside Ltd [2008] EWCA Civ 746*) and a decision suspected to have been made otherwise can be challenged via application for judicial review on this basis.

3) The principle of development in this location

The proposals are promoted as a natural 'extension' to Arborfield Green SDL (the former REME army garrison) currently under development. I challenge this assertion for the following reasons:

a) The SDL is a previously-developed site which comprised a mixture of redundant military buildings, marshall yards, workshops and educational training facilities, utility and recreation spaces, and a significant quantum of former MOD housing. As such, it was predominantly an urban environment as per any army garrison hosting a regiment. Conversely, the land at Barkham Square comprises open countryside, devoid of development, interspersed with ancient hedgerows and remnant pockets of ancient woodland that once formed the extensive Kidgem Copse. There can be no greater contrast between the *genii loci* of these two landscapes; their defining characteristics are distinct.

b) The provision of only a single point of vehicular access/exit to the development site, there being a complete absence of interconnecting roads between it and the SDL. This is evident from diagram ITL 11337-GA-001 submitted in support of the application. For clarity, the purpose and status of the 'secondary' site access in Commonfield Lane, as depicted in diagram ITL 11337-GA-002 is not clear, given that this portion of the development site has been identified as SANG, and so the presumption must be that any access road leading from it will not interconnect directly with either the

development proposed or the SDL. Consequently, the proposals would not utilise any of the existing minor roads or main transport routes within the SDL.

c) The distribution of development within the site. Although indicative, the concentration of development depicted in the proposed site plan falls in its central and north/north east sections, exhibiting noticeable spatial separation with the distribution of housing within the SDL. This significant degree of separation will endure even when the Arborfield Studios site is developed.

d) The development site would remain separated physically from the SDL by the ancient native hedgerows and woodland mentioned above, that define the historic estate boundary of Barkham Square and are to be retained.

In conclusion, whilst the proposed development site and the SDL might be located adjacent to each other geographically, for the reasons set out in (a) – (d) above, Barkham Square would not be an extension to the SDL but instead constitute a discrete and isolated new settlement in the countryside. This is contrary directly to adopted Core Strategy policies CP11 and CP18(5), amongst others, and also paragraph 77 of the current NPPF (section 5 below refers); and, consequently, must weigh significantly against the proposals via any objective appraisal.

4) Inadequacy of the local road network

Wokingham Borough has one of the highest levels of car ownership per household in the country. This was estimated by the LPA to be 1.6 vehicles per household as long ago as 2001 (source: paragraph 2.16 of the Wokingham Borough Adopted Core Policy). A significant quantum of housing development has taken place in the area in the ensuing 25 years and, allied with increased demand for independent means of travel and societal changes, this metric must now be at least or in excess of 2.0 per household. The proposals for 660 new residential units would therefore increase daily vehicle movements by approximately 1000 – 1320 on surrounding rural roads which are narrow, poorly-maintained and predominantly unlit.

Of particular concern is the B3349 Barkham Road which, although classified as residential road subject to a 30 mph speed along the majority of its length, serves as strategic east-west commuter route to and from Wokingham, and destinations beyond. I submitted primary evidence to the LPU Examination in Public (EiP) at Stage 1 on delays I experienced personally during a journey on this road. A redacted version of this is attached at Appendix 1 and constitutes part of my objection to this application on the grounds of the adverse impact its proposals would cause on the local road network and existing levels of traffic congestion.

I also submitted separate evidence relating to the constraints placed on the free flow of traffic along the B3349 at its eastern terminus during EiP Stage 2 proceedings, caused by the operation of the automated level crossing barriers at Wokingham BR station. Many of the vehicle movements attributable to the proposals will be made via this route for commuting to destinations eastwards or to access public transport hubs for connections elsewhere (including the Elizabeth Line at Twyford) and so will, in turn, exacerbate traffic congestion. My (redacted) evidence on this matter is attached at Appendix 2 and its content further constitutes my objection to the proposals on this ground.

The measures proposed to mitigate the impact of vehicle movements resulting from the new settlement are wholly Insufficient: opportunities for active travel are limited not only because of the condition of surrounding roads but also by demographics (particularly for the young, elderly and disabled); the single bus service which would serve the development (Leopard 3) takes an excessive amount of time to reach Wokingham and Reading, and no stops are proposed within the new

settlement itself, which would necessitate walking to existing stops which are not within reasonable distances from it; and there is no independently-verified, empirical evidence to demonstrate that the My Journey Wokingham initiative has reduced reliance on private motor vehicles by any meaningful extent.

5) Unsustainable location

Paragraph 77 of the current Framework (NPPF) sets out the criteria for the delivery of new housing. The following is pertinent:

*'The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, **provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes)**'* and

'In doing so, they [LPAs] should:

- a)*
- b) **ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access;***
- c)*

[My emphasis added.]

Neither of these qualifications is met in the case of Barkham Square. The content of section 4 above plus appendices explains why it is not, on the basis of poor road infrastructure and limited public transport but the matter of sustainability (of location) encompasses broader considerations.

The introduction to the LPA's *Infrastructure Delivery Plan (September 2024)*, a document which supports the LPU, states:

'For the avoidance of doubt, the IDP does not set out definitive timescales or allocate funding. A scheme may be added to, or taken out of, the IDP as necessary. Therefore, the inclusion of a scheme within the IDP does not guarantee it will be delivered.'

This is a caveat of significant proportion and cannot be disregarded because of the potentially adverse implications of the non-delivery of any of the infrastructure improvements cited as being necessary for Barkham Square in the table on page 32 of the IDP. Theoretically, none at all could be implemented. The delivery of infrastructure improvements associated with the current phase of development of Arborfield Green SDL has already been delayed significantly, causing inconvenience and detriment to local residents, prompting action by the LPA, at least two parish councils and successive elected ward representatives to try and hold its developers to their commitment to deliver what they promised when they sought planning permission.

Whilst acknowledged that the situation is the same for any development site proposed in the LPU, the potential impact of late, partial or non-delivery of infrastructure measures would be less for those in locations served by good public transport services, established community and recreational facilities, shops and road networks. The new settlement at Barkham Square will have no facilities of its own and so its residents would have to share the few which exist elsewhere:

- a) One public house in Barkham (The Bull) which is beyond reasonable walking distance of the development site, has been closed repeatedly over the past six years (as currently) and the future of which is uncertain because of the inability of successive tenants to operate it profitably.
- b) The nearest Post Office, also beyond reasonable walking distance, the future of which is also in question because of significantly-decreased custom due to road closures associated with Thames Water's mains renewal programme in Barkham, which is set to continue on a rolling basis for a further year at least.
- c) Limited sport and recreation facilities, for example the tennis courts in Arborfield Green have not been operational for a significant period of time due to ongoing legal disagreements between developers and the local authority.
- d) Limited retail facilities other than food stores, requiring residents to travel to either Wokingham or Reading (or beyond) in order to access other goods or services needed.
- e) One coffee shop (The Stables at Arborfield Green).
- f) No NHS healthcare facility serving the SDL, despite the promise of one a decade ago when developers set out their 'vision' for the community. This has led to increased demand on Finchampstead and Swallowfield GP practices, whose performance in the delivery of services to patients has declined as a consequence. 660 additional households would inevitably worsen the situation.

6) Adverse impact on landscape character

The introduction of built residential development of the scale proposed into the countryside at Barkham Square would inevitably cause harm to the character of the prevailing landscape. It would alter irrevocably the way in which the landscape is experienced from a variety of surrounding locations in the public realm, including adjacent PRow Barkham BA7 and also from the B3349 (Barkham and Langley Common roads) situated north of the site. From points along the Barkham Road between Bridge Cottages and Greenacres, pedestrians and road-users enjoy long views of an open, natural landscape. Indeed, it is from them that the importance of this landscape in preserving settlement separation between Arborfield Green SDL and Barkham Street Area of Special Character/Barkham Hill Limited Development Location is evident. This is reflected in Core Strategy policy CP18, to which the proposals are contrary. The application site falls within the separation zone as depicted on the policies map on the penultimate page of the document (indicated by brown/orange zig-zags).

The proposals would be contrary to the LPA's management and improvement strategies contained in the Landscape Character Assessment (2019) for this area (J2 - Arborfield and Barkham Settled and Farmed Clay). Furthermore, should the LPA decide to give more than limited weight to the policies contained in the LPU when determining this application, then the proposals would be further contrary to draft policy NE6, as part of the development site falls within the Bearwood and Barkham Valued Landscape (as depicted in the policies map D2) and the remainder which does not is directly proximate to it. In terms of either (policy) scenario, the visual impacts associated with the form and massing of a settlement of this scale would be significant and difficult, if not impossible, to mitigate satisfactorily. It is notable that no such measures have been proposed and the quality of the landscape would be degraded accordingly.

It is not clear from diagram ITL 11337-GA-001 what length of ancient hedgerow would be removed in order to create the access junction to the development site or what (if any) remedial planting is proposed. This has implications for the residents of Langley Common Road, as sensitive receptors living in proximity to it, and where the degree of visual change experienced by them will be significant. Ancient hedgerows are also protected by the 1996 statutory regulations.

7) Increased flood risk

I also submitted primary evidence on this matter during stage 1 of the EiP, which is attached at Appendix 3 and constitutes part of my objection to this application on this ground. The water course which crosses the development site drains directly into the Barkham Brook, which is susceptible to regular flooding incidents and thus categorised as being within EA Flood Zones 2 and 3. Nearby Bridge Cottages also fall within the same.

Currently, fluvial load within the former is relatively modest because of drainage which occurs by soil infiltration across the (approximately) 140 acres of grassland which constitutes the development site. Hard standing associated with the footprint of 660 dwellings, their driveways and gardens, plus estate roads and pathways will reduce this area markedly and result in the reliance on sustainable urban drainage schemes (SuDS) instead.

It is not speculation but a matter of fact that Wokingham BC, as local flood authority (LFA), does not maintain adequately its drainage assets, including SuDS, in the vicinity of Barkham Bridge (as the evidence in Appendix 3 demonstrates). Unfortunately, the LFA appears to be in a state of complete denial in this regard and so I am concerned that the similar schemes proposed for the settlement at Barkham Square will suffer the same fate when adopted by the authority. Should they perform as badly, pluvial run-off will not be attenuated sufficiently and flooding of the Barkham Brook will increase. Designing SuDS on a laptop does not equate to them performing adequately in practice, particularly when neglected.

8) Adverse impact on a protected species and its habitat

In written and oral evidence at the EiP, I mentioned the existence in the Barkham Brook of White-clawed crayfish (*Austropotamobius pallipes*), a species protected under schedule 5 of the Wildlife and Countryside Act 1981 and which appears on the IUCN Red List of Threatened Species. This colony was identified by officers of the Environment Agency in the summer of 2020, during an emergency response to an over-pumping incident which occurred when the replacement Barkham Bridge was under construction. According to the EA, this species has been recorded in only **two** water courses in the entirety of its southern region (that is, including the Barkham Brook), because of its widespread displacement by the American Signal Crayfish (*Pacifastacus leniusculus*) and habitat loss. The rarity of these native crustaceans and the importance of their presence cannot, therefore, be overstated.

In response to this, the applicant has submitted a species survey which concludes that none are present in the water course on the development site and, consequently, no mitigation measures are required. This misses the point significantly. At no point in time have I suggested that White-clawed crayfish are present in that water course: my objection on this ground relates to the effect the proposals will have on it and, in turn therefore, the Barkham Brook and the community of them present therein. In particular, I am concerned by:

- a) The overall increase in fluvial loading on the Barkham Brook, which would result from the outfall of new surface water drainage systems (as crayfish are susceptible to being washed away permanently from their habitat when rivers are in spate). Section (7) above refers in this regard.
- b) The potential for increased silting, from materials such as sand, soil and dust entering drains both during construction phase (identified as being approximately 6-8 years) and after properties are occupied. Crayfish inhabit crevices formed by rocks or pebbles on the bottom or sides of a water course, which is not possible if they are obscured by silt.
- c) Contamination, including the particulate rubber and plastics constituents from vehicle tyres via normal wear, plus petrol and/or diesel spills, detergents and other household chemicals, etc., all of which will also enter the water courses via run-off into new road gullies and SuDS.
- d) Foul waste discharge from sewers during adverse weather conditions. It is a matter of fact that discharge incidents from Arborfield Sewage Treatment Works have increased because its capacity has been exceeded by the significant increase locally in the volume of housing. Sewers upstream from this facility also back up and overflow as a consequence of this. The main sewerage carrier pipe into which they feed runs adjacent to the Barkham Brook and the water course located on the proposed development site and so the risk of contamination is heightened. It should be noted that the Environment Agency stated in response to a written question posed by the planning inspectors examining the LPU the following, in respect of proposed development at Barkham Square/Arborfield Green:

c. Is it clear that sufficient sewerage capacity would be available to facilitate the proposed development?

'As detailed in the EA and WBC's SoCG (March 2025), Thames Water confirmed in December 2024 that Arborfield STW has a growth scheme in AMP8 to build capacity up to 2036. When the scheme was prepared this was based on 4,800 new homes between 2024-2036. WBC subsequently signed a SoCG with Thames Water in February 2025 that states there are no known significant water supply, wastewater or sewage treatment capacity issues that would prevent, or delay the delivery of the site allocations proposed in the plan. Whilst the EA welcomes TW's growth scheme to build capacity, the EA and WBC's SoCG (March 2025) explains that the EA's position on this matter differs to TW's. It was agreed that the EA would engage with WBC and Thames Water to seek further information on the scheme. TW have since approached the EA for pre-application advice for Arborfield STW. However, TW has not provided reassurance that their growth scheme in AMP8, to build capacity up to 2036, is still on track. The EA needs assurance from TW that the funds are available and that the proposed works will be completed before, or in line with, WBC's allocations being built/prior to being occupied. Without this reassurance the EA cannot be satisfied that there is sufficient sewerage capacity available to facilitate the plan's proposed development.'

As it is also designated a priority species, the Government provides guidance on the White-clawed crayfish for developers and planning decision-makers at: <https://www.gov.uk/guidance/white-clawed-crayfish-advice-for-making-planning-decisions> , which encompasses some of the points referred to. I suggest it is a serious deficiency that the potential impacts of the proposals on the Barkham Brook have not been assessed because the species survey focused solely on the water course on the development site and which therefore must weigh against the application.

9) Bronze Age archaeological feature

In 1992, a Bronze Age burnt mound and gully (carbon-dated to 2890 +/- 80 BC) was discovered on the proposed development site by Thames Valley Archaeological Services during excavations associated with the installation of the main sewerage carrier pipeline referred to in section 8 above. It is a sizeable feature approximately 14 metres long (N-S) x 5.5 metres wide (E-W), located at grid reference: SU 77675 66285 (approximately, given its dimensions). The report of the excavation noted the possibility that the feature could extend further in any direction, due to only part of it being revealed because of the extent of the easement associated with the pipeline project.

This feature is listed on the Berkshire Historic Environmental Record under reference EWK205 and Historic England Monument Number 1147330. Given this, I am surprised that the summary and conclusions of the desk-based archaeological appraisal submitted in support of the application does not recommend measures for its protection from development proposals or that further investigation of it should take place. Although the report identifies moderate potential on site for the presence of further burnt mounds and other evidence of occupation/activity from the Bronze Age, it categorises their potential significance as being only low/medium, which not only do I find puzzling but suggest is decidedly premature, given the known evidence *in-situ*.

Consequently, should the LPA be minded to approve this application, I believe it should be subject to comprehensive conditions relating to the investigation of below-ground archaeology and, specifically, protection of the asset described.

The following image is an excerpt from the archaeological report, showing the location of the burnt mound (the two lines containing arrows represent the water course):

[overleaf]

BARKHAM SQUARE BURNT MOUND 1992

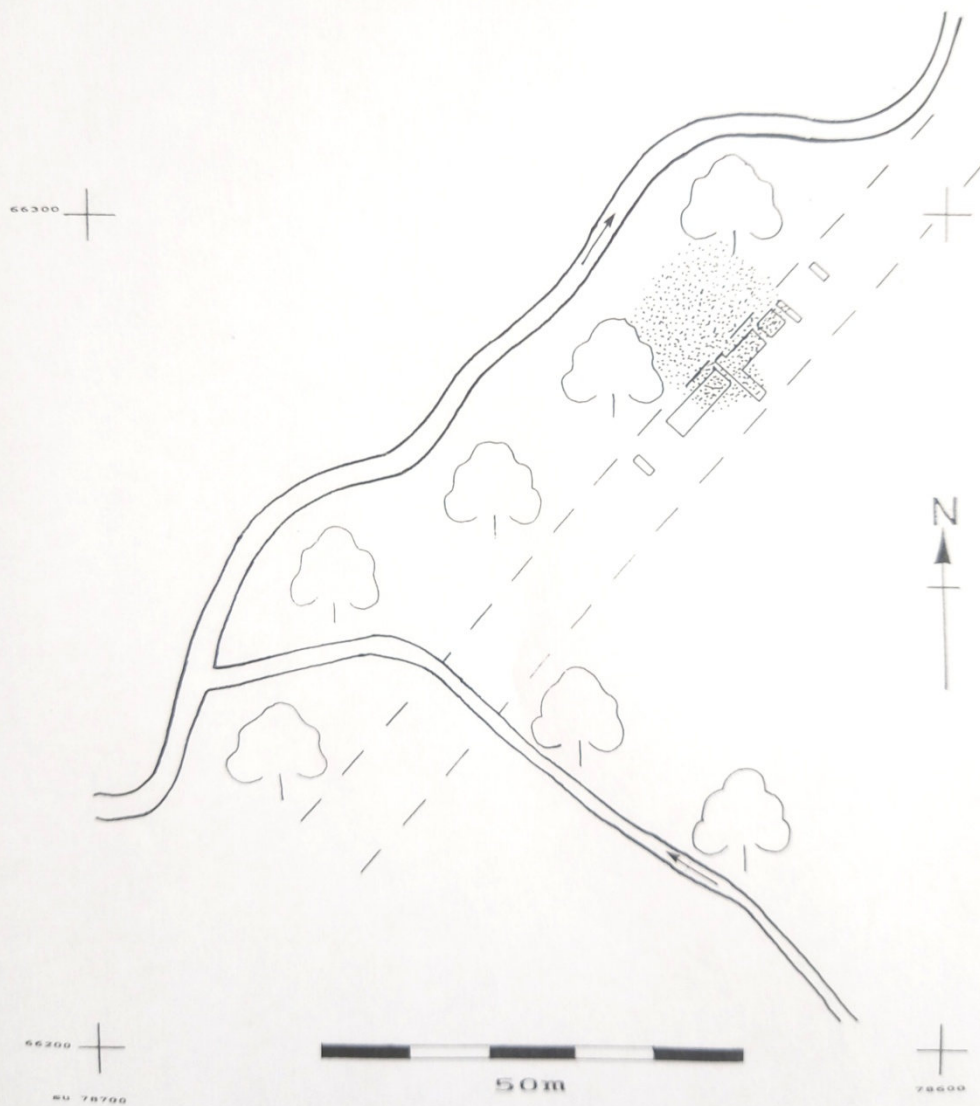


Fig. 3 detailed location of
burnt mound

10) Loss of Best and Most Versatile (BMV) agricultural land

BMV agricultural land is defined in Annex 2 of the NPPF as that which falls into grades 1, 2 and 3a of the Agricultural Land Classification (ALC). The report of the ALC survey conducted on the site concluded that the proposals would result in the loss of 31.6 ha of BMV land in Grade 2 and sub-grade 3a, of which 23.3 ha would constitute irreversible development. The report states that the loss of BMV agricultural land is not precluded by paragraph 187 of the NPPF but that its economic and other value should be recognised. This is as narrow an interpretation as could be formulated, based on the absence in the Framework of an explicit statement disbaring the loss of BMV land – however, the policy intention is clear: *‘recognising the intrinsic value’* of BMV land does not equate to its loss being acceptable.

However, it has been established by the courts that planning decisions should be made in accordance with the policies contained in the development plan, unless material considerations dictate otherwise. Core Strategy Policy CP1(7) states that: *‘planning permission will be granted for development proposals that avoid areas of best and most versatile agricultural land.’* The proposals do not avoid those areas and so are contrary to this part of the policy. Therefore I raise objection on this basis.

The report suggests that the grazing of sheep on the site is not economically viable and, therefore, its economic value (in agricultural terms) is low. This disregards several points:

- a) The meaning of the letter ‘V’ in ‘BMV’, which indicates that it could be used for an alternative, more productive/profitable agricultural uses.
- b) The grazing of sheep has been solely the choice of the current land owner.
- c) Before its current ownership, Barkham Square’s land was in more intensive and varied agricultural use, with a wide range of arable crops under rotational cultivation, allied with meadow land for grazing by more types of livestock than at present and the production of hay. I can attest to this because I observed it first-hand.

Consequently, the conclusion drawn in the report is skewed because it underplays the opportunities available for alternative agricultural uses and seeks to minimise the true value of the land, based only on its current limited use.

The loss of BMV agricultural land is highly unwise at a time when there is an absence of domestic food security. The Covid pandemic and conflict in Ukraine demonstrated the volatility of the cost of imported foodstuffs (particularly wheat), the fragility of their supply when faced with global demand from other markets and how heavily reliant the UK is on them; leading, in part, to the cost of living crisis which has affected households nationwide. The availability of agricultural land for food production must be maintained at a reasonable level, particularly in the south of England, where there has been a significant loss of this vital resource to residential and commercial development in recent times (in research published in July 2024, the charity organisation CPRE estimated this to be in the region of 14,500 hectares in the past 12 years, involving development of over 287,00 new houses, and correlating to a loss in production of 250,000 tonnes of vegetables per annum).

Finally, the report suggests that the area to be lost is minor when compared to the total quantum of BMV land within the LPA’s area. Similarly, this disregards the scale of loss which has occurred in the

parish itself as a consequence of the SDL and other sporadic developments of scale, plus the loss in the future of a significant area of BMV land to the consented Barkham solar-generation site. This has particular relevance in what was until recently a predominantly-rural parish, the character of which is being degraded by the effects of cumulative development.

11) Settlement hierarchy (LPU)

Solely in the event that more than limited weight is given to draft LPU policies in the determination, policy SS2 sections (7)-(9) define what constitute major, modest and minor settlements in the settlement hierarchy, and the planning principles that will guide future development in them. Given it is my contention that Barkham Square cannot reasonably be considered an extension to the Arborfield Green SDL, I believe it has been categorised incorrectly as a modest development site. This is not solely because the proposed quantum of housing would constitute major development under national planning guidance (and if planning permission or permission in principle were applied for and determined under s.70 TCPA 1990) but, separately, because the factors which define a minor settlement in section (9) of the policy apply directly to it: namely, Barkham is a small village with limited facilities and the site is located in the countryside (as also defined ultimately in policy SS2).

The categorisation of Barkham Square as 'modest' is not merely a matter of semantics. In legislation and regulations, an application for planning permission or permission in principle involving new dwellings is categorised as a being major application if either the number of dwellings to be constructed is 10 or more or, if the number of dwellings is not specified in the application, the site area is 0.5 hectares or more. The proposed development at Barkham Square exceeds these parameters significantly. Separately, and in the alternative, as the LPA contends that Barkham Square represents an expansion of the Arborfield Green SDL (which is itself a major development) then, by extension (of that argument), the former cannot be categorised as 'modest' development.

This point is pertinent because the proposals are contrary to the settlement hierarchy, inverting it in essence or, colloquially: 'trying to fit a quart into a pint pot'. This weighs against the application significantly (if regard is had to this policy, as per the caveat above).

12) Miscellaneous matters

No justification has been provided to explain why the quantum of development proposed in this application exceeds the housing capacity of the site identified in LPU policy SS11 (660 units versus 600). I suggest this is excessive and therefore raise further objection on this basis. Furthermore, if regard is to be had to the LPU in the determination, then I believe that the increase is also contrary to the principle of policy H1(3) (as supported by paragraphs 9.9 and 9.10) and policies ER8 1(f) and DH1 (*ibid*). Taken together, these indicate clearly the principle of higher density development being acceptable in urban settings and lower densities elsewhere, which respond appropriately to factors such as character and setting. The Barkham Square site is undeniably rural in character and so an increase in housing density of the scale proposed is incongruous with this principle.

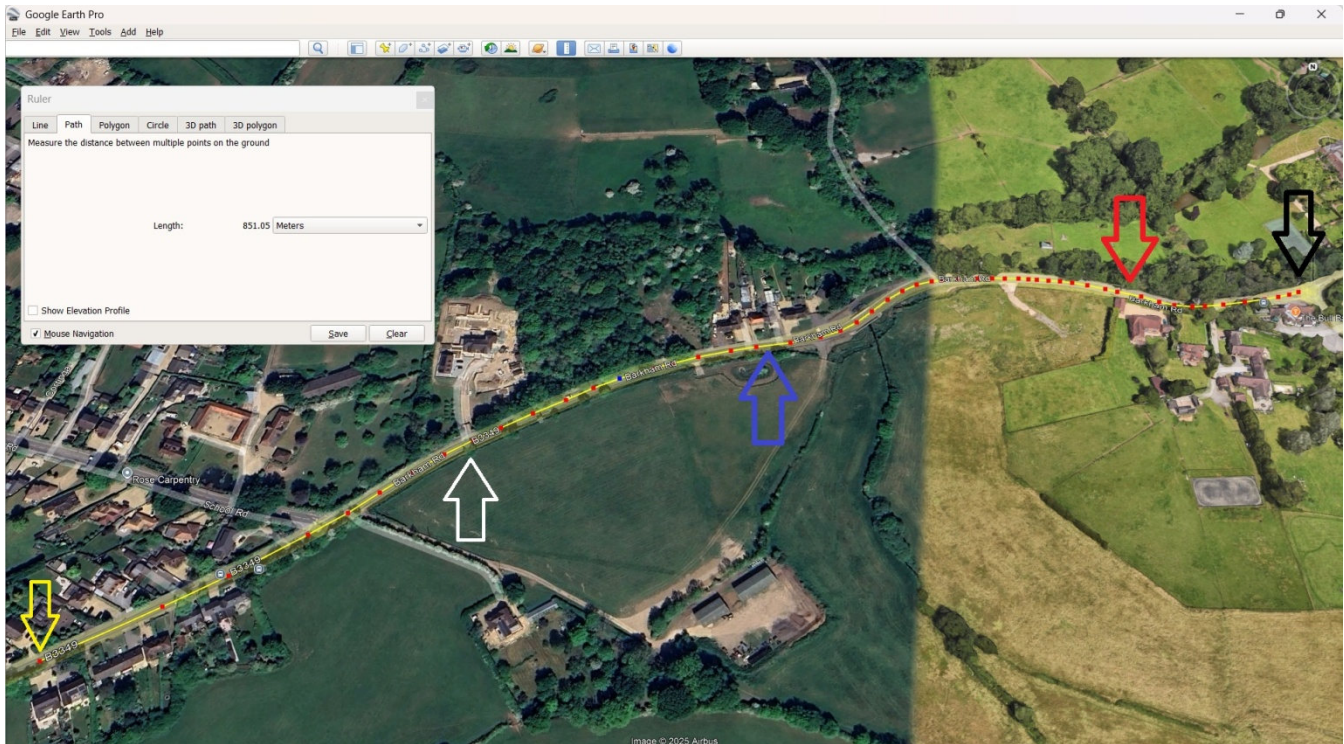
I question why the development proposed is concentrated in the north of the site, in proximity to existing residential properties in Langley Common Road and Field House, as opposed to the south which is far less populated on its periphery. Given the nature of the existing landscape and the extent to which it would change if the proposals endure, the effects on sensitive receptors living in proximity to them would be lessened if the concentration of development were to be relocated southerly, towards Commonfield Lane. Other commentators have objected to the location of allotments in this area in the south of the site, on the basis that they are remote and could

encourage travel to and from them by motor vehicle. Relocating them to the north/northeast, whilst shifting the body of development south, would resolve both problems simultaneously.

For all the reasons set out above and in the appendices to this document, I urge that this application be refused.

Appendix 1 – Objection to PA 261059 – King

1. [Redacted]
2. At 08:34 hrs on Thursday 2nd October, whilst driving, I joined a queue of traffic which extended back from the junction of Barkham Road/Street (at the Bull public house) to no. 27 Langley Common Road, Barkham. I recorded this journey on camera, a copy of which I retained and would be happy to provide to the Examination, should verification be required. For the purposes of this statement, I use screen-capture images instead. In the commentary I made during the recording, I estimated that the distance between the two locations mentioned (and, thus, the length of the queue) was approximately 800 metres. Using the measurement tool in Google Earth Pro™ its length was, in fact, more at 851.05 metres:



Key to image 1 above:

- Yellow arrow = 27 Langley Common Road
- White arrow = Caldwell House
- Blue arrow = Bridge Cottages (between nos. 2 and 3)
- Red arrow = Greenacres
- Black arrow = Junction of Barkham Road/Barkham Street (at the Bull PH).

The following images are excerpts captured from various points of the recording. Some of the arrows used in the key above have been added for cross-reference to corresponding locations.

Image 2 below is taken from the start of the recording. A hedge and evergreen tree is visible on the RHS that, by reference to aerial mapping, enabled me to identify with accuracy the location of the terminus of the queue of traffic I joined:

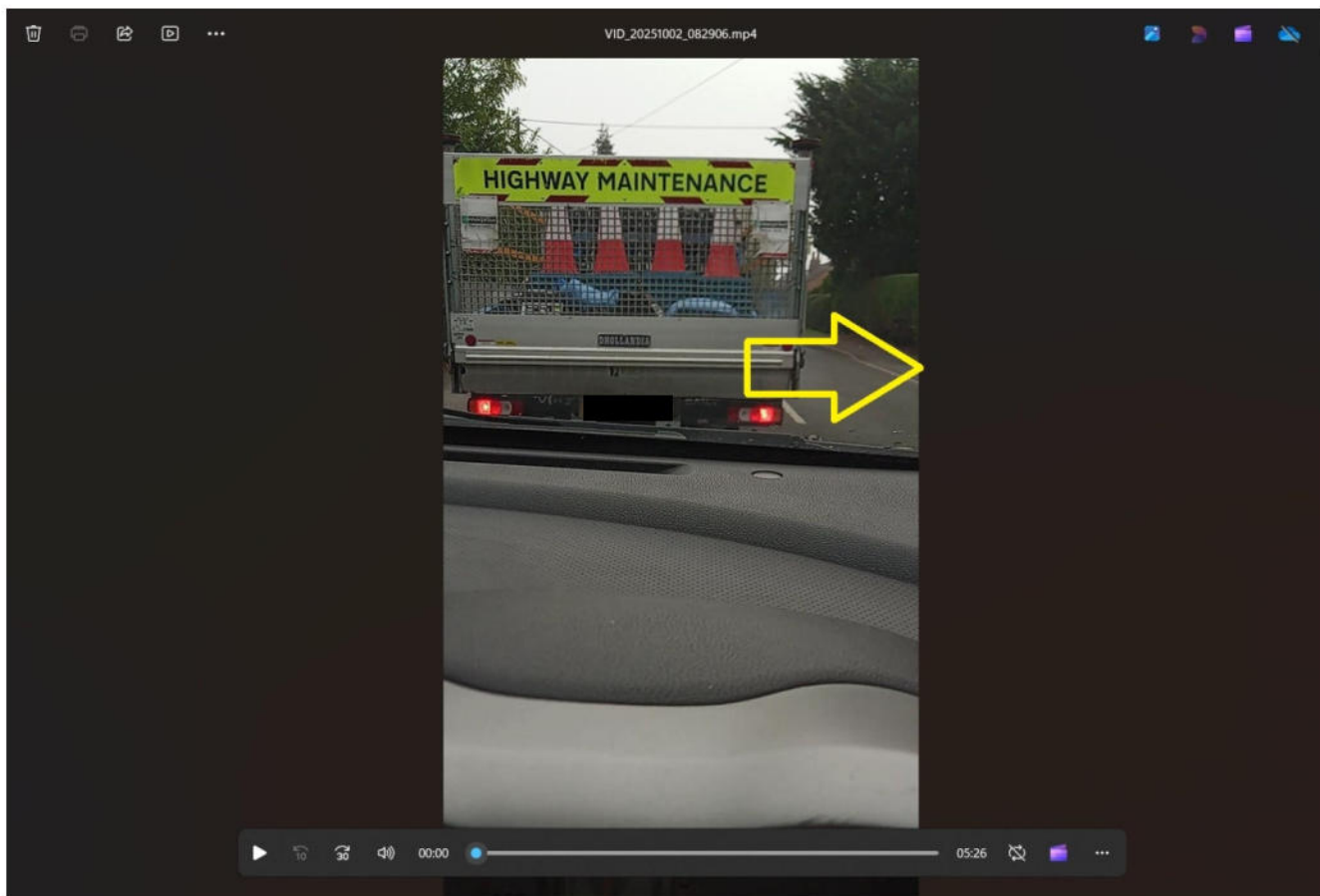


Image 3 below is an excerpt taken at 2 minutes 37 seconds elapsed time, at a point between Caldwell House and Bridge Cottages on the B3349 Barkham Road. Stationary traffic queuing into the middle distance (namely, at Bridge Cottages) is evident from the illumination of the rear brake lights of most of the vehicles:

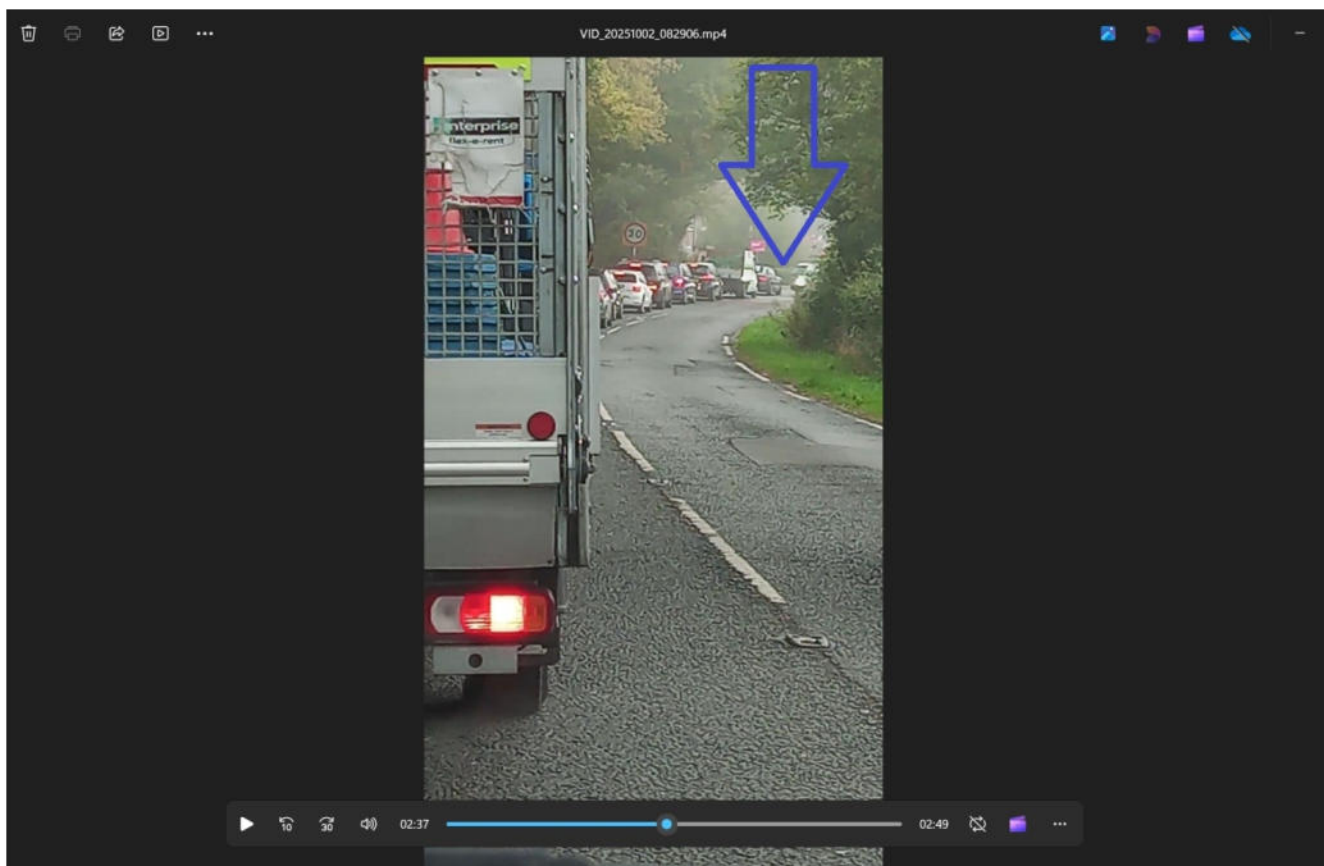


Image 4 below is an excerpt at 4 minutes 28 seconds of the recording. By virtue of the angle, this shows the queue extending into the far distance from a position closer to Bridge Cottages than image 3, to a point on the highway proximate to Greenacres:

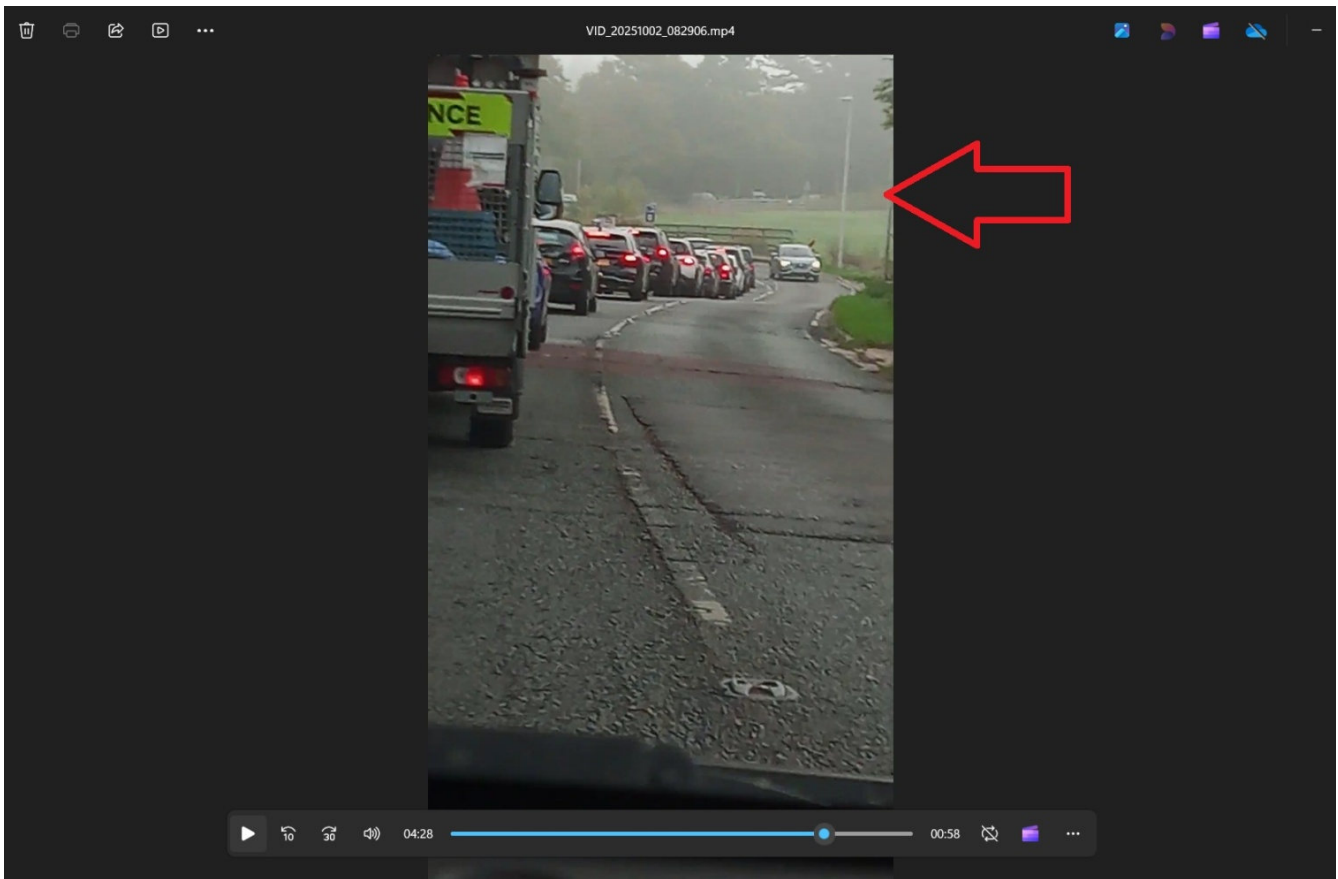
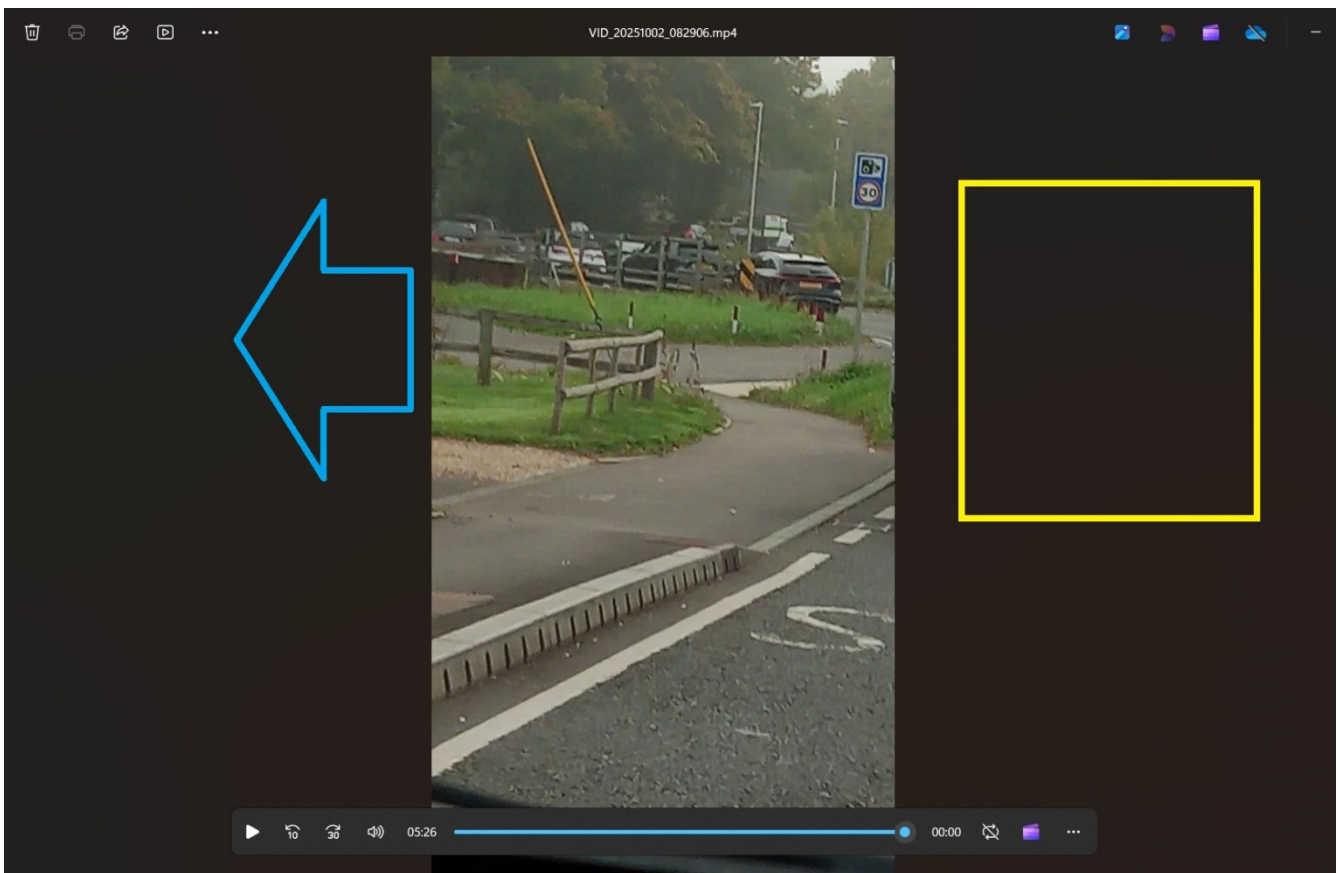
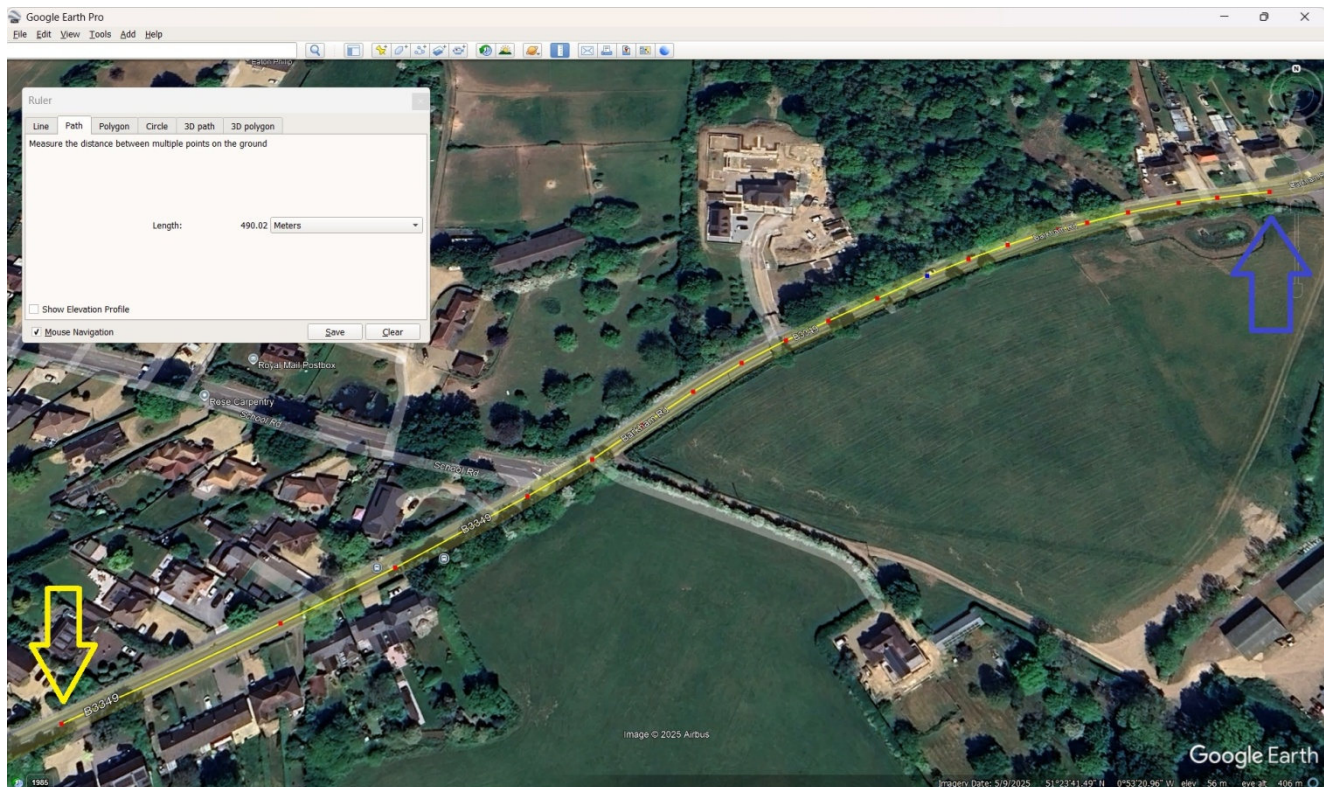


Image 5 below is excerpted from the end of the recording, between nos. 2 and 3 Bridge Cottages:



[Note: due to the angle of the camera at this point, three vehicles in front of my car are not visible (including the highway maintenance vehicle immediately in front). The latter's position on the carriageway is therefore represented by the yellow rectangle.]

Image 6 below shows the distance between 27 Langley Common Road and a point between nos. 2 and 3 Bridge Cottages as being approximately 490 metres, also by use of the measurement tool in Google Earth Pro™:



3. As is evident from the images above, the total duration of the recording is **5 minutes, 26 seconds**. Using the distance in image 6 and the formula: $\text{speed} = \text{distance} / \text{time}$, this means that my average speed was: $490\text{m} / 326\text{s} = 1.5 \text{ m/s}$ or **3.35 mph**. This is analogous to average walking speed (or less). By extrapolation, this means that (based on the reasonable presumption that this speed would have been maintained) it would have taken me **9 minutes and 27 seconds** from where I joined the queue of traffic in Langley Common Road to reach the junction at the Bull PH, a distance of approximately **851 metres** (as per image 1 above).
4. I submit that this demonstrates empirically how congested this section of the B3349 Barkham/Langley Common Road is at peak hours. This is despite civil engineering works completed in 2020 by Wokingham BC's highway contractors to build a replacement for the Barkham Bridge (proximate to Bridge Cottages), thereby removing the priority system in operation previously which delayed traffic, as part of the traffic mitigation measures for Arborfield Green SDL. This must be considered in the context that the SDL has not yet been fully built-out but the peak hours loading on this part of the highway network is already severe. I submit further that it demonstrates:
 - a) the traffic mitigation works for the Barkham Bridge were insufficient in isolation to have remedied the significant traffic congestion caused on the B3349 by the junctions at Barkham Road/Street and Barkham/Bearwood roads, had the operation of this section of the network been considered by the LPA strategically;
 - b) Wokingham BC's strategic traffic modelling software either cannot be functioning or have been interrogated properly, if its output has led the LPA to conclude that the site access arrangement onto Langley Common Road would be acceptable. 600 new dwellings would produce significant peak hour vehicle movements. Even if only half of these movements were east towards Wokingham or Winnersh (a reasonable presumption, given their BR stations provide opportunity for onward travel to London and elsewhere), the situation on the B3349 would be worsened severely.

5. It should also be borne in mind that the problem I have illustrated exists on a B-road in a rural, not urban or suburban location, where traffic congestion of this magnitude would be more typical. I submit that the truth of the matter is that, whilst Arborfield Green SDL was sustainable from the perspective of building on previously-developed land, it was and is not sustainable from a highway network perspective, in relation to routes to Wokingham (BR link, shopping and employment centre), Crowthorne (BR link, shops), Winnersh (BR link, shops) and Finchampstead (GP surgery, post office and shops).
6. The creation of Observer Way (a major classified road by-passing Arborfield Cross village centre) facilitates vehicular travel to Shinfield (A329M/M4 road links, science park) and Reading (BR link, major shopping/other facilities) very well but, naturally, only a certain proportion of residents of the SDL travel (or would travel, if it were extended) in this direction, leaving the remainder to sit in slow-moving or stationary queues of the nature demonstrated above, on minor roads never designed to accommodate such volumes of traffic. For example, Barkham Street and Barkham Ride both are subject to a width restriction prohibiting vehicles wider than 6' 6" (other than buses), and Commonfield Lane is a single-lane road with intermittent passing-places, of limited utility in terms of network capacity overall, regardless of past but undeniably-modest works by Wokingham BC to improve these passing-places.

[Redacted]

9. Several refused planning applications and dismissed planning appeals for sites in Barkham in recent times have illustrated that travel on the network by some alternative modes of transport is not attractive. Walking to Wokingham BR station from Barkham Square would take approximately an hour (at average walking speed) but includes sections of pavement that are both narrow and unlit; a safety concern for many. Walking to Winnersh BR is impossible due to the absence of pavement and the absence of a bus service. Cycling to Wokingham (and elsewhere) is perilous, because of the poorly-maintained road surface of the B3349, the traffic congestion mentioned already and a combination of persistent speeding by vehicles along this route and the width of the highway/frequency of oncoming traffic meaning that the safe passing of cyclists is severely compromised. This is why, personally, I stopped cycling to Wokingham several years ago and, by simple observation of daily peak travel periods, very few (if any) cyclists are evident on this section of the highway network for, I suggest, the same reasons.
10. Although it is only right to acknowledge that the frequency of the Reading Buses Service 3 (to and from Wokingham) has been increased recently, it should be noted that funding for this is not permanent and therefore cannot be relied on as an enduring mitigation measure. Furthermore, simple observation again demonstrates that the number of peak-hour journeys made by individuals via this mode of transport from stops in Arborfield/Barkham to Wokingham is not significant in the overall transport mix. The reason for the poor uptake is unclear but likely to include:
- a) The walking distance to a bus stop which, in many instances, is considerable (and indeed would be the case for future residents of Barkham Square who would be required to utilise stops in Arborfield Green SDL);
 - b) the bus route from Arborfield Green SDL to Wokingham is convoluted (via Finchampstead, not directly eastward via the Barkham Road). For example, from Sheerlands Road (which those from Barkham Square would be likely to use) during peak hours (08.20 am), the average journey time to Wokingham BR station is cited on the timetable as being 29 minutes. This does not include any delays due to congestion or road works, etc.
 - c) societal perceptions of public transport/cost (recently increased after withdrawal of subsidy)/insufficient shelter in poor weather conditions.

11. I do not believe that initiatives such as car-clubs/sharing or the provision of vouchers for 'My Journey Wokingham' to the future residents of Barkham Square are credible mitigations worthy of comment, other than to point out that the latter mentioned has no demonstrable record of reducing reliance on private vehicle journeys in the borough to any meaningful degree.
12. Whilst I do not believe that the access road proposed onto Langley Common Road is at all sensible, the problem it subtends is much broader and, therefore, would not be resolved by its relocation elsewhere (for example, by utilising existing internal roads within the SDL or by constructing an additional access road to the south of the development site). This is because the additional loading on the B3349 caused by 600 new dwellings at Barkham Square (and the 300 arising from the intensified of housing density at the Arborfield Studios site) would still occur because the proportion of residents travelling east from them would have no other viable route by which to do so. By way of example, vehicles travelling to Wokingham, were they to emerge from a 'southern' access road (in Commonfield Lane, say) would be required to drive north along Barkham Street, whereupon they would queue at the troublesome B3349 Barkham Road/Street junction at the Bull PH before joining the Barkham Road itself, where queuing from the junction of Barkham/Bearwood roads at Coppid Hill already extends back to the Bull PH. Because the queuing elsewhere I describe earlier in this statement is caused by vehicles on the Barkham Road being required to give way to those turning right onto it from Barkham Street at the Bull PH, it would simply be exacerbated.
13. The physical constraints of the Barkham Road/Street and Barkham/Bearwood roads junctions are inescapable and such that it would not be possible to improve either of them to the extent that they could accommodate either the additional volume of traffic which will result on completion of the SDL in its current form, or that from the further quantum of development proposed via LPU policy SS11.
14. Consequently, I respectfully submit that the matters I have mentioned demonstrate instead that:
 - a) the Barkham Square site is fundamentally unsustainable, in overall transport terms; and
 - b) the inclusion of the site in the LPU is thus unsound, being contrary to the provisions of the NPPF [*inter alia*, sections 20(b); 109(c), (d) and (f); 110; 115(d); and, notably, 116 (in respect of 'severe' impacts)].

3rd November 2025

[End.]

Appendix 2 – objection to PA 261059 – King

[Preceding, unrelated content redacted]

Road infrastructure

1. My earlier written evidence [to the EiP] illustrated traffic congestion on local roads in proximity to Arborfield Green SDL (AGSDL), in particular a section of the B3349 Barkham/Langley Common roads, Barkham. The following relates to the operation of the B3349 elsewhere, factors which may affect this in the medium term and the implications this has for the soundness of draft policy SS11.
2. If I could ask the joint examiners to take away just one aspect of my evidence overall it would be that the B3349, as a classified residential road subject to a 30 mph speed limit for the majority of its length (approximately 3.6 km of its total length of 4.9 km – *source: Google Maps Pro™*) is being required *de facto* to function instead as an A-road, in terms of vehicle movements and its role as a major east-west transport route. This situation is unlike any other part of the highway network in proximity to other SDLs or elsewhere where development of significant quantum is proposed and, as such, it is worthy of discrete consideration.
3. It is exacerbated by the fact that the B3349 is severely constrained at its eastern terminus in Wokingham by the operation of the level crossing at Wokingham BR station. Its gates are closed eight times during most hours of every week-day (*source: South West Trains and Great Western timetables*) while services arrive and depart the station. At certain points of the day, either two or three services can arrive/depart in close succession, meaning that the elapsed waiting period for road users during these episodes is prolonged. In any case, the barriers are closed for a period of 3-5 minutes for the arrival/ departure of a single service, equating to a total closure time of approximately 24-40 minutes every hour.
4. In addition to these delays, there are phased three-way traffic lights in automatic operation at the barriers, plus a pedestrian crossing. The traffic lights are not synchronised with the barriers, the effect of which is that vehicles travelling east-west on the B3349 is held at times even when the barriers are raised (to enable those travelling along Wellington Road to cross the junction and allow exit from Oxford Road separately). This adds approximately 3 minutes per phase cyclically. As a consequence of this combination of factors, traffic queues extend along the B3349 westwards for significant distances at periods throughout the day. This problem is increased during peak travel hours and also when road closures elsewhere in the network divert additional traffic onto the B3349, such as occurred recently on the Finchampstead Road nearby. In circumstances such as this, the subsequent congestion is severe (that is, of a scale sufficient to meet the definition in the NPPF).
5. There is evidence to suggest that the number of train services travelling through Wokingham may increase over the LPU plan period as a consequence of improvements to the strategic rail network across the wider region. Arguably the most significant of these is the planned expansion of Heathrow Airport, where the increase in passenger numbers arising from the provision of an additional runway will necessitate additional capacity in public transport via road and rail. During a Commons debate on 22nd October 2025, the Transport Secretary confirmed that, as part of the Government's review of the Airports National Policy Statement, it "*will be looking at rail in detail through the ANPS review and the public transport requirements in order to be able to have an expanded Heathrow with a third runway that*

operates successfully" (source column 979: Hansard¹). This includes renewed consideration of additional western and southern rail links serving Heathrow, considered by stakeholders as being essential in order to deliver airport expansion successfully. Network Rail estimates that a 60 per cent increase in network capacity is required by 2043 in order to serve Heathrow's expansion, and stated historically (2016) that there was a strong case for a feasibility study into a southern link². Highways England, Transport for London and others support a southern link in principle (source: *Heathrow Southern Railway website*³) and Spelthorne Borough Council also does, subject to the proviso that it must serve Staines (source: *Spelthorne BC press notice of 10th November 2025*⁴).

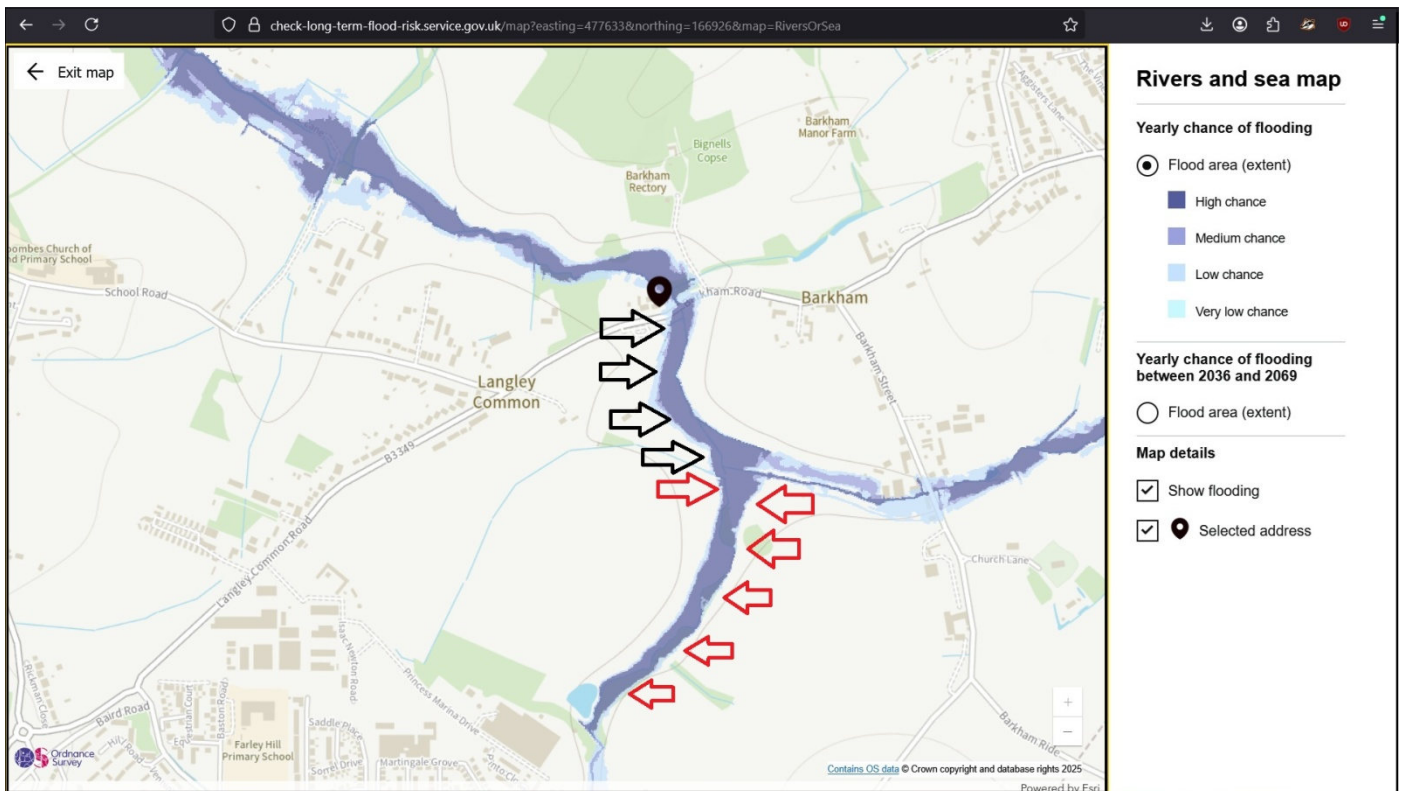
6. Whilst neither scheme is new, the adoption of either could have implications for Wokingham BR station and, in turn, the B3349. In particular, the Heathrow Southern Railway scheme proposes a new rail link between Heathrow's Terminal 5 and Chertsey or Staines BR stations, with a spur to Virginia Water. Like Wokingham, both of the latter stations are located on the Reading to London Waterloo line and, because of their proposed function as interchanges to the new one, would lead to increased passenger demand for services on the Reading to London Waterloo route. This phenomenon is evident elsewhere at Twyford BR station, as a consequence of the extension of the Elizabeth Line to Reading, and is analogous to this situation. There, Wokingham Borough Council is already experiencing significant and well-publicised challenges relating to the provision of parking and congestion on local roads resulting from increased demand (source: *numerous local press articles, including Wokingham Today*⁵) and it is notable that, unlike Wokingham, Twyford BR station does not even have a level crossing to factor into the problem. If additional demand were to result in the increased frequency and duration of the level crossing barriers at Wokingham station being closed throughout the day (as is not unreasonable to presume), it would have inevitable and profound consequences for highway congestion on the B3349.
7. It is also not unreasonable to presume that a proportion of future residents of an 'expanded AGSDL' would wish to travel to Heathrow Airport at some stage by public transport, in addition to commuting on a more frequent basis to London via accessing the Reading to London Waterloo services at Wokingham station. This poses the question of whether Wokingham Borough Council has performed modelling using WSTM4 to establish what would be the combined impact of increased closures of the level crossing barriers and increased trip rates to Wokingham along the B3349 for road users, and what mitigation measures might be necessary. It is unclear also whether the Council has engaged in dialogue with Network Rail and/or Heathrow Southern Railway directly, in order to gain understanding of what likely impacts a southern link would have on train services through Wokingham, so that it can be better prepared to address them than has demonstrably been the case at Twyford.
8. I respectfully submit that the issues identified at the eastern terminus of the B3349 at Wokingham, both current and potential, should be given careful consideration when assessing the overall soundness of LPU policy SS11.

1st March 2026

1. <https://hansard.parliament.uk/Commons/2025-10-22/debates/EFD26F58-2421-4C6F-8E15-AABDB2BE0D12/HeathrowNationalAirportsReview#contribution-1588BF41-AE37-459D-863C-BBF100020223>
2. <https://mediacentre.heathrow.com/pressrelease/detail/6119>
3. <https://heathrowrail.com/endorsements/>
4. <https://www.spelthorne.gov.uk/news/2025/spelthorne-borough-council-announces-conditional-support-heathrow-southern-rail-link>
5. <https://wokingham.today/twyford-station-car-park-comes-to-council/>

Appendix 3 – objection to PA 261059 – King

1. I do not believe that the flood risk associated with the development proposed at Barkham Square has been considered adequately, in terms of its potential impact on the flood zone of the Barkham Brook 'corridor' which is located close to the site. Consequently, I believe this to be a constraint falling under the section of the MIQ cited above and so would like to submit this statement on the matter.
2. A significant section of the Barkham Brook (proximate to the Barkham Bridge) and the watercourse which exists on the proposed development site are located in areas designated by the Environment Agency via the National Flood Risk Assessment (NaFRA2) in March 2025 as flood zones 2 and 3 with a high and medium chance of annual flooding, as depicted in the following (image no.1):



[Note: the red arrows added to this image indicate the likely extent of annual flooding on land within the development site boundary and the black arrows on land N/NW of it (that is, downstream). The location of nos. 1-6 Bridge Cottages, Barkham, is depicted by the black roundel.]

3. The Barkham Brook floods regularly during winter and spring months. The prevailing geology is of London Clay (as identified in Wokingham BC's Landscape Character Assessments of 2004 and 2019) and exhibits a high water table, to the extent that a body of surface water located parallel to the brook also forms periodically during these months, as shown in image 2 below:



[Note: the proposed development site can be seen behind the trees/hedgerow located near the green container in the background of the photograph. As is evident, the elevation of the land (AoD) is higher than the field in which the body of standing water is visible, in the middle/foreground.]

4. Due to their position by Barkham Bridge, Bridge Cottages are affected by the flooding of the brook. The photographs on the following pages show that which occurred during summer 2007, after significant rainfall. All of these properties experienced flooding as a consequence of this episode.

[This area is intentionally blank]



Image 3 (above): the (original) Barkham Bridge under flood, the breached fence of 1 Bridge Cottages being visible.



Image 4 (above): from a slightly different angle, showing the lateral extent of flooding - as far as bridleway BA6.



Image 5 (above): looking west from the junction of the B3349 Barkham Road and bridleway BA6.

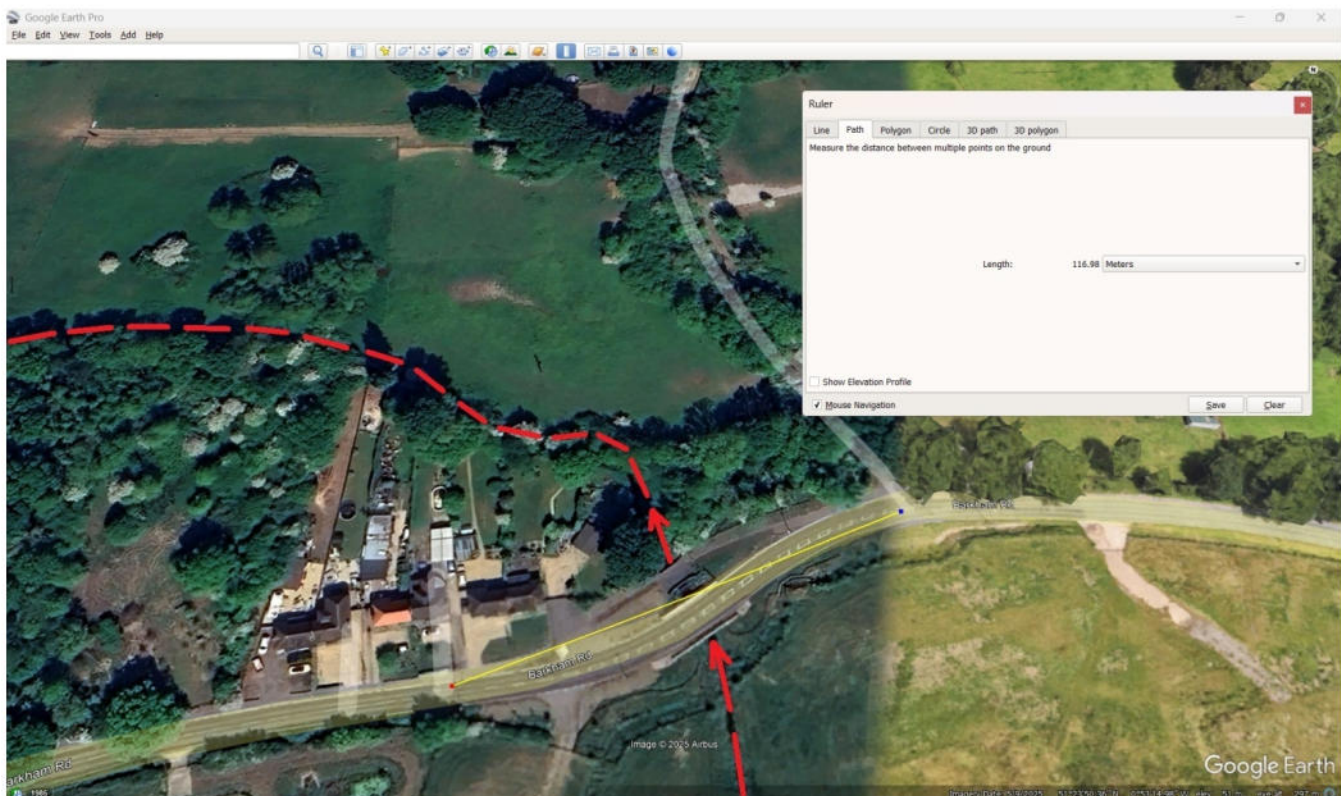


Image 6 (above): measurement using Google Earth Pro™ indicates that the extent of the flooding to have been approximately 117 metres laterally on the B3349 Barkham Road. However, its total extent was greater than this, due to the brook's route north of Bridge Cottages, indicated by the broken red line.

5. Whilst resolution of the following matter is beyond the scope of the Examination, it is necessary to explain the unintended consequences of the construction of the new Barkham Bridge in 2020, in order to understand fully the overall flood risk to Bridge Cottages currently. This was a highways mitigation measure arising from Arborfield Green SDL, in order to remove the priority system which existed previously in this location, causing traffic congestion. Since completion, pluvial drainage in the vicinity of Bridge Cottages has been problematic, despite repeated assurances from Wokingham BC (local flood authority) that the bridge and its drainage system were designed to meet all relevant standards. This is due to a combination of factors:
- a) Highway drainage gulley openings between Langley Common Road and Bridge Cottages were replaced with a combined kerb drainage system of holes and sump, which become blocked because they are not maintained by the Council. In certain areas, the holes are elevated above the road surface. Consequently, water does not enter them but instead runs downhill on the highway to Bridge Cottages (the lowest point in the system AoD);
 - b) The holding pond into which some of this water is supposed to drain is not operating correctly because of the failure of the kerb drainage and, therefore, it affords minimal attenuation. Its outflow to a u-ditch is also compromised by the roots of a willow tree and other vegetation that germinated there;
 - c) The camber of the new road surface has been increased so that surface water crosses the highway from its southern verge to the northern, on which side Bridge Cottages are located;
 - d) The three drainage gulley-openings that remain in the highway between nos. 1 and 2 Bridge Cottages do not have sufficient capacity to cope with the resultant pluvial flow caused by factors (a) – (c) above during episodes of heavy rainfall;
 - e) The ACO drains installed in the driveways of nos. 1-3 Bridge Cottages become overwhelmed quickly, due to the further absence of maintenance by the Council and inadequate size;
 - f) To the eastern side of the bridge, surface water flooding after rainfall occurs regularly because of an unidentified deficiency in that area of the drainage system.

The following photographs illustrate points (a) – (f) above, in turn. Image 7 - non-functional kerb drainage:



Image 8 - non-functional holding pond:



Image 9 - surface water crossing the highway:



[Note: this was due to a minor mains water leak but serves to demonstrate the camber towards Bridge Cottages and how surface water crosses the highway, missing the kerb drainage (indicated) completely in this section.]

Image 10 - the (insufficient) three highway gulley-openings serving Bridge Cottages:



[Redacted]

Image 12 - standing water on the highway, east of the bridge:



8. Fluvial capacity has also remained an issue. The new bridge was elevated when built, in order not to be as susceptible to flooding but, unfortunately, the original remains *in-situ* adjacent to it. Unfortunate because it was a combination of the insufficient size of its bore and parapet walls (which diverted flood water laterally) which caused the extent of flooding in 2007. Because nothing has changed in this respect, the situation could reoccur

easily. Regardless of this, Wokingham BC remained unconvinced of the need to remove it (or even the walls alone). Indeed, the new bridge itself was only approximately 450 mm from being over-topped during an extended but otherwise unremarkable period of rainfall in May 2023, casting doubt on the LFA's assertion that it could withstand extreme flooding events. Image 13 illustrates this:



9. It is the state of denial exhibited by Wokingham BC that its drainage design contractors could possibly make fundamental mistakes of this nature which leaves me with grave concerns about the potential effects of the Barkham Square proposals on the flood zone. At its nearest point, the development site is located just 25 metres from the Barkham Brook and its topology is such that surface and ground water drains into the brook via the water course which traverses the site. The indicative site plan illustrates that housing would be concentrated in the north of the development site, with all the implications for flooding associated with this choice.
10. Considering the site in overall terms, given the area of hard-surfacing which would be created for 600 dwellings and the volume of surface water run-off produced, it is reasonable to conclude that the drainage system for development of this quantum would dwarf the localised scheme designed previously for Barkham Bridge. Due to the soil classification, natural infiltration would not be sufficient to address this and so a similar 'SuD' scheme, involving attenuation, would be required. Should it perform in practice as poorly as the former (which is entirely feasible), the consequences for those households located downstream nearby could be horrendous.
11. Therefore, I was disappointed and surprised in equal measure by the conclusion in the statement of common ground between Wokingham BC and the Environment Agency that policy SS11 of the LPU would not increase flood risk. It would appear they have together taken a very narrow view of the development site in isolation and disregarded the potential for its adverse effect on adjoining land. What concerns me about assurances provided by Wokingham BC regarding drainage and flood mitigation is that they are, demonstrably, meaningless. I say this not as a rebuke but to make the point that such measures are only effective if they actually perform as intended, a significant caveat underpinning a matter which simply cannot be regarded as 'given'. Reliance on computer-modelling/design is understandable and I am certainly no Luddite but prefer to rely on empirical evidence in relation to a matter as serious as flooding.

12. It is notable that the Level 2 Strategic Flood Risk Assessment (2021) states that the modelling for the Barkham Brook was based on Environment Agency data published in 2006, that is, prior to the 2007 episode (the second bulleted point of paragraph 2.6.1 refers). Furthermore, this document and the subsequent Level 1 SFRA (2023) appear to consider the flood risk associated with the Barkham Brook only in terms of its impact downstream on the proposed Loddon Valley Garden Village SDL, rather than within Barkham itself (unless the output is buried deep within one of the numerous appendices, in which case I stand to be corrected). One of these (Appendix E) states in a column entitled 'Existing Defences' that the Barkham Brook has 'natural high ground defences' which I find difficult to comprehend; it seems to me to be patently incorrect.
13. Given the acknowledged effects of climate change, it is only a matter of time before an episode similar to 2007 reoccurs and I believe the proposals for Barkham Square mean that the severity of such an episode would be increased as a consequence. Unquestionably, it would not be lessened. I do not want to see a combination of the same type of mistakes which were made in relation to the Barkham Bridge project and an absence of maintenance repeated at Barkham Square. [Redacted]. To my knowledge, no-one from the LPA, Environment Agency or developers have ever surveyed in person the flood plain of the Barkham Brook to gain insights, in relation to the proposals for Barkham Square.
14. Paragraph 165 of the NPPF provides that development proposals should not lead to an increased risk of flooding elsewhere. Paragraph 166 requires that plan policies consider cumulative impacts in, or affecting, local areas susceptible to flooding and that flood risk should be managed in relation to 'all sources'. Paragraph 167 *et seq* specifies sequential testing for areas where flooding is known to occur. I would also draw attention to footnote 59. Whilst I acknowledge that the site has been subject to a SFRA (a summary appears in the LPU Sequential and Exception Test document 2023 at pages 110 -117), I believe aspects of the assessment and its conclusions are contentious. For example, the location of housing within the indicative site plan published elsewhere does not accord with the constraints cited in the SFRA and the justification used in the latter that the site passes the sequential/exception tests simply because '*...there is a need to identify a sufficient supply of dwellings to meet needs*' not only disregards the wider flood risk posed but is a completely circular argument.

3rd November 2025

[End.]