

PLANNING REF : 241567
PROPERTY ADDRESS : 1 Blackwater View
: Finchampstead
: RG40 3TF
SUBMITTED BY : Mr Nicholas Hall
DATE SUBMITTED : 27/12/2024

COMMENTS:

I wish to object to this application as the site is unsuitable in several respects including:

- it fails to comply with Wokingham Borough Council's Local Planning Policy CP1 Sustainable Development (see Flooding and Subsidence sections below); This risk will increase significantly over time as water levels across the UK and the world rise;
- the Transport Statement fails to meet WBC policy CP6 Managing Travel Demand and is flawed to the point of being dangerous, particularly to young families (see Transportation section below). Those in the affordable houses will have great difficulty accessing schools, shops and public services given they are less likely to have a car available - the revised submission still relies upon a car being available for almost every journey and acknowledges that the local bus service does not meet CP6 and that cars are required for almost every journey;
- Buildings Insurance will be hard to obtain, expensive and with potential exclusions in cover (see Buildings Insurance section below). This will likely have an unacceptable financial/cost of living impact, particularly on those in all the affordable houses.

Flooding

Topographic mapping demonstrates that a significant area of the proposed site is at exactly the same height (53m-54m) or below (c52m near the western boundary) than the nearest lakes (54m) in the

adjoining flood plain that are in Flood Zone 2 or even Flood Zone 3. This is particularly the case in the area adjoining Longwater Road (52m) that would be the proposed entry/exit point of the site such that waterlogging/flooding will likely be a frequent occurrence. (Unfortunately these maps can't be uploaded as only text is permitted in these comments).

The Environment Agency mapping showing the flood plain stopping in straight lines on the southern edge of the proposed site appears to be incorrect/is clearly not realistic, as the straight line being shown is a shallow ditch that is less than 1 metre deep, below the topographic map height of the nearby flood plain surface and is there to provide only surface water drainage from Longwater Road i.e. running from West to East into the flood plain area (see applicant's RPS Flood Risk Assessment and Conceptual Drainage Strategy Report, page 8, paragraph 4.7, Fig. 3).

When gravel extraction was taking place in the flood plain area between the proposed site and the Blackwater River, in the previous 20+ years up until 2023 there was a topsoil bund at least 5 metres high on the southern edge of this ditch providing a significant barrier to flooding. However, when the works finished in 2023, the topsoil bund was removed and the soil redistributed as part of the site restoration works required by Wokingham Borough Council. In the applicant's RPS Flood Risk Assessment and Conceptual Drainage Strategy Report, page 12, paragraph 6.8 states "The EA's historic flood map illustrates that there are no recorded flood events within the site boundary. The 2007 historic flood extents impacted up to

the southern site boundary but did not impact the site." This is misleading as the temporary 5m+ topsoil bund that was in place at that time from the gravel excavation providing a barrier to flooding - as noted above, this is now no longer in place.

The Environment Agency appears to have used the same out-of-date data in its flood projections shown in paragraph 6.9, Figure 6. The boundaries between Flood Zones will not be straight lines without a significant flood barrier(s) being in place, which is no longer the case.

A simple site visit makes this quite obvious.

As a result, this would place many parts of the proposed site within Flood Zone 2 or even Flood Zone 3 and not Flood Zone 1 as put forward in the applicant's RPS Flood Risk Assessment and Conceptual Drainage Strategy Report.

Further, the Environment Agency (and previously the National Rivers Authority until it was subsumed into the Environment Agency in 1996) has previously advised that they are employing a strategy of allowing trees along the banks of the Blackwater River to fall into the river with the express intention of backing up the flow of water along the river (which flows from east to west) during periods of heavier rainfall and for this area to act as a flood plain to prevent greater flooding downstream in more populated areas. The applicant's RPS Flood Risk Assessment and Conceptual Drainage Strategy Report

provides an example of the impact of heavy rainfall and notes this in paragraph 6.20 referring to the Thames Valley Flood Scheme. As a consequence, several times a year the water overflows the river banks, particularly to the north of the river, into the area bordering the southern boundary of the proposed site and with the removal of the topsoil bund potentially onto parts of the site itself.

As the applicant's RPS Flood Risk Assessment and Conceptual Drainage Strategy Report also notes, longer range weather forecasts from expert bodies predict that there will be increasing levels of rainfall in both summer and winter thereby increasing the probability of increased levels flooding from the river which would in turn directly impact the proposed site.

Therefore this application fails to meet WBC's CP1 Sustainable Development criterion to "Avoid increasing (and where possible reduce) risks of or from all forms of flooding (including from groundwater).

Subsidence

Insurers have recorded several incidences of subsidence both to houses in Wood Moor that run along the northern boundary of the proposed

site, and also to houses in Burnmoor Meadow on the opposite side of Longwater Road. These areas are both recognized as high risk post codes for subsidence.

This would therefore imply that the soil structure of this proposed site will be equally or even more unstable, given its proximity to the flood plain and higher water table, and therefore unsuitable for building than the houses in Wood Moor that run along the northern boundary of this site.

Insurers will therefore significantly increase insurance premiums to reflect the significantly higher risk of large claims.

Buildings Insurance

Much of my career has been in the insurance industry, which has included being responsible for the buildings & contents underwriting activities for two of the UK's largest insurers.

A standard question asked by insurers will be the proximity of a dwelling to water (rivers, lakes etc). Some ask if the dwelling is within 1 mile and others within 400m of water. As noted in the applicant's RPS Flood Risk Assessment and Conceptual Drainage Strategy Report on Page 11 paragraphs 6.1 and 6.2, the proposed dwellings are within 100-150m of the nearest lake and only 360m from the Blackwater

River.

Taking into account the points made in the Flooding and Subsidence sections above and the proximity of the site to both lakes and the river, buildings insurance cover would be difficult to obtain. (The insurance Flood Re scheme in the UK, with a very few exceptions, only covers buildings constructed before 1 January 2009 as the Government wanted to ensure that new housing development would avoid flood risk areas). Therefore many insurers may decline to offer cover, and any cover that might be offered will be with high premium loadings and high excesses, and/or the insurance contract will specifically exclude cover for flood damage, insurers viewing the site as unsuitable for any development.

Transportation

This site fails to meet the requirements specified in WBC policy CP6 of the adopted Core Strategy - "Managing Travel Demand".

The applicant's plan proposes to use an existing footpath and the Lower Sandhurst Road to access transport and facilities in Crowthorne, a recommendation that is flawed for a number of reasons:

- ? Both the path and the Lower Sandhurst Road are unlit and will be unsafe for use for a significant proportion of the year during early morning and late afternoon / evening, as a means of reaching proposed facilities and amenities in Crowthorne.

- ? The proposed footpath is not maintained

The Lower Sandhurst Road

- ? is a narrow road that does not allow 2 cars to easily pass,

- ? permits a speed limit of 60 mph,

- ? has no footpath along its entire length of c1 mile,

- ? is damaged at its edges in many places by the heavy commercial traffic that regularly accesses Manor Farm (The Europlants plc fruit plant farm). This makes it unsafe underfoot when cyclists and pedestrians have to move to the side allowing motor vehicles to pass during daylight hours, and simply dangerous at night with no lighting, where a mis-step or hitting a pothole when cycling can cause a serious injury to occur.

Paragraph 115 of the NPPF is clear that: "Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety " It is clear from the points above that the applicants recommended use of the Lower Sandhurst Road by cyclists and possibly pedestrians to access rail transport and facilities in Crowthorne (see applicant's Transport Statement, paragraphs 3.5.1 and 3.12.4) will have an unacceptable impact on highway safety.

The application fails to identify safe walking routes to local schools other than the local C of E primary school and there are no safe cycling routes to any school, as Highway Code 64 specifically prohibits cycling on pavements and the local highways are unsuitable for children to ride on.

Further, this development would be accessing a very busy road and

therefore introduces further risk of accidents along an area which is notorious for speeding. The site would create a dangerous junction where the Longwater Road transitions from 30 to 60mph. Therefore no part of the applicant's Transport Statement convinces that residents of the proposed site will have any choice but to use private vehicles to access local amenities and facilities which therefore fails to meet the requirements of WBC policy CP6.

Private vehicles will therefore have a significant environmental impact - those in affordable housing being unable to afford electric cars will likely have older, more polluting petrol or diesel vehicles.

Wildlife

This very large development would be adjacent to a designated wildlife area and further development to the area will have a further damaging impact on the local wildlife and birdlife especially the light which would have an urbanising effect to the detriment of the wildlife in the area.

It has been noted that in the recent past, the landowner has removed a large hedge running the length of the site between the public footpath and the northern boundary of the site which used to house nesting birds and other wildlife. This is at odds with the applicant's Draft Habitat Management and Monitoring Plan.

Healthcare

The Finchampstead doctors surgery is unable to take further patients and is at capacity.

Urbanisation

This greenfield site development erodes the Green gap between Finchampstead and Eversley and the 2 storey properties would be inappropriate to the character of the area.

Finchampstead Neighbourhood Development Plan

Development here does not comply with policies cp1, cp3, cp4, cp6 or cp9 of the Wokingham Local plan or the Finchampstead Neighbourhood Development Plan and is at a far greater density than any of the other neighbouring developments.

Gorse Ride and Arborfield developments provide ample social housing in more sustainable locations and which align with WBC planning policies.

For all these reasons I object to the development.