

## Planning Objection Letter

Re: **Planning Application 260439**

Site: **Land to rear of 297 to 303 Nine Mile Ride, Finchampstead Wokingham RG40 3NR**

Submitted to: **Wokingham Borough Council**

Dear Sir / Madam

I wish to formally object to the above planning application.

Whilst I recognise the need for appropriate accommodation provision for Gypsy and Traveller communities in accordance with national policy, there are significant reasons for objection.

This proposal (**application 260439**) represents a wholly unsuitable form of development in a designated area of Countryside (as per the 2010 Wokingham Core Strategy, the 2024 Local Plan and the Finchampstead Neighbourhood Development Plan). This raises cumulative and significant local planning concerns. The seemingly coincidental unauthorized development (**at time of writing invalid application 260577**) in the site immediately opposite, which was installed overnight over a weekend at the same time as this submission, is noted. There is no implication of association, but this adjacent site provides insight into the inappropriate scale and scope of the current valid application.

Objections to **application 260439** specifically relate to conflict with current planning policy, suitability of the site, the safety of the site and its proposed occupants, and environmental wildlife impact.

### 1. The proposal is in direct conflict with local planning policy:

- The site is designated as 'Countryside' in the Core Strategy and Finchampstead Neighbourhood Development Plan (FNP) and is part of 'Woodland' described in Annex L of the FNP. Notably, it is beyond the settlement boundaries set out in the 2010 Wokingham Local Plan, the 2024 draft Local Plan and the Finchampstead Neighbourhood Development Plan.
- The proposed development would introduce a form of residential occupation in a location where such development would not normally be permitted. Windfall sites defined by the applicant must face higher scrutiny than allocated sites under the local plan, specifically regarding countryside protection, landscape harm and sustainability concerns. This site demonstrably contravenes all three of those, with harm significantly overwhelming benefit.

### 2. The proposal is in an unsustainable location:

- The site proposed is on a minor road / track with no paved surface. The track is mud-prone in the winter, resulting in increased vehicle usage in and out of the lane. Whilst manageable for its current residential density of four properties, increased vehicular access for an expanded and mobile population will rapidly diminish track

- usability and further increase the maintenance burden for existing residents (and / or WBC under the Highways Act 1980).
- The proposed hardstanding can accommodate a more substantive number of cars and touring caravans than currently defined, meaning that the unsustainable use of this site could grow considerably without requiring further planning consent under permitted development. If the use of those caravans is incidental to the use of the proposed static caravan on the site, no Caravan Site Licence would be needed.
  - Given the distances to local amenities (shops, GPs, local schools, pharmacies etc.) and given the condition of Range Road, it is far more likely that unsustainable vehicular access will increase.
  - The lane has no footpaths and no passing points for pedestrians, especially following the unauthorized scraping of private land along the sides of the track for the unsuccessful location of caravans. This non-permitted widening has further limited pedestrian access to Range Road for residents, dog walkers and ramblers in the area, preventing reasonable use of green spaces. It is my understanding that residents on the road intend to restore the private verges back to their previous width for pedestrian use, which would limit access to oversize vehicles.

### **3. The proposal has highway safety and access concerns:**

- The proposal will create highway safety risks due to increased vehicle movements associated with residential occupation and the towing of caravans. Range Road has been deemed unsuitable in previous declined planning applications (Planning application **061483** (2006) - see below).
- The track width is much less than the standard benchmark single-track access guideline for caravans of 4.5-5.0 metres, despite the attempts made by the instigators of the unauthorized development to widen the lane with heavy machinery and remove trees lining the track, all without permission on March 6<sup>th</sup>. They tore up small trees, which were subsequently piled against the fence boundaries of residents, removed concrete curbs intended to maintain the integrity of track access, and damaged the roots of mature TPO trees [Figure 1 & Figure 2]. Even with this unauthorised widening activity, the track is only 2.8 metres in width near its access. Static caravans are typically 3-3.6 metres wide for a standard single unit model and up to 4.27 metres for some of the larger models. An attempt to place a standard static caravan on site (7<sup>th</sup> March, repeated 10<sup>th</sup> March) was unsuccessful, as the caravan would not fit into the lane and vehicles blocked the B3430 Nine Mile Ride without authorization for a sustained period – the police had to be called [Figure 2]. Alternative access at the northern end of Range Road for oversize vehicles is blocked by overhanging trees [Figure 4]. Further development would inevitably lead to pressure for the authorized or unauthorized pruning or removal of TPO trees, resulting in the further erosion of the woodland character that the planning system seeks to protect.
- There is poor visibility and no sight lines for long vehicles at the site access on the B3430 Nine Mile Ride and a 50mph speed limit on Sandhurst Road, especially from the hillcrest to the west of the access. There would be increased traffic movement with this proposal, and a lack of adequate turning space for caravans and larger vehicles. For the latter, there is no space for turning or passing on the lane,

no space for turning on the proposed sites and no space for turning or passing at the access.

- If access arrangements cannot safely accommodate these movements, the development could result in unacceptable impacts on highway safety.



**Figure 1:** Showing extent of damage adjacent to property on corner of NMR and Range Road. This was deemed as “no identified damage” by the WBC PRoW Highways Team – email Tuesday 31<sup>st</sup> March – Laura Buck) showing trees banked up against fenced boundaries during clearance and an attempted widening on to private property (as currently defined by WBC Highways Team). This activity was undertaken between 17:30am on Friday 6<sup>th</sup> March and 03:30am in Saturday 7<sup>th</sup> March. Photo has meta-data showing location and date taken on 13<sup>th</sup> March 2026, at a time deemed safe for residents to approach.



**Figure 2:** Showing base of oak tree and damage to root system by an attempted widening of the track with a digger at southern entrance of Range Road. By exposing and damaging the root in this way, there will be an increased risk of infection by decay pathogens. This activity was undertaken between 17:30am on Friday 6<sup>th</sup> March and 03:30am in Saturday 7<sup>th</sup> March, although not by the applicant for this proposed development (that I am aware). Photo has meta-data showing location and date taken on 21<sup>st</sup> March 2026, at a time deemed safe for residents to approach.



**Figure 3:** This photo shows the attempted and failed installation of a static caravan by the instigators of the invalid retrospective planning application on Range Road. This was the second attempt to place a static caravan through the lane following widening activities overnight in prior days. The caravan and supporting vehicles blocked Nine Mile Ride for a considerable time and the police were called to the location. Photo has meta-data showing location and date taken on 10<sup>th</sup> March 2026. Photo has been cropped from the original.



**Figure 4:** This photo shows access from the northerly entrance to Range Road from Sandhurst Road (photo is taken looking north towards Sandhurst Road). This shows a tree overhanging the track which would prevent large vehicle access from this direction. Photo has meta-data showing location and date taken on the 21<sup>st</sup> March 2026.

#### 4. The proposal has significant location safety concerns:

- This area of woodland is mixed deciduous with a large population of Silver Birch (*Betula pendula*). These trees can pose real, practical risks to thin-skinned caravans and mobile homes in woodland settings. Silver Birch are susceptible to fungal infestation including *Marssonina betulae* and honey fungus, which can cause branch or trunk failure. The presence of Polypore fungus is often a sign that a tree is weak or dying [Figure 5]. Whilst Finchampstead does not experience sustained extreme weather (based on measurements taken in Bracknell, Berkshire experiences around 30-45 days per year with wind speeds exceeding 30 mph, mostly in the winter), less frequent storms can bring failure of the whole tree, rather than incremental and localized branch fall. It is noted that, in the woodland subject to this planning application, there are a number of healthy mature silver birch trees within the development site outline following September-October 2025 clearance and at least two failed silver birch trunks leaning dangerously near the site [Figure 6]. The presence of mature Silver Birch trees in close proximity to thin-skinned dwellings creates an inherently unsafe environment for residential occupation. Due to site clearance, the winter (January 2026) Tree Survey & Arboriculture Impact Assessment (BS5837:2012) notes that there are no canopies overhanging the development. However, the full site is in reach of falling trees. The development would inevitably lead to pressure for the pruning or removal of these trees, resulting in the further erosion of the woodland character and expansion of urbanisation that the planning system seeks to protect.
  - *[Personal observation] My family stays out of the wooded area during stormy weather. We have witnessed the failure of one or two complete mature silver birch trees every winter season on our land. We live here.*



**Figure 5:** Photo from adjacent woodland showing wood rot in Silver Birch after insect and fungus infestation.

- Range Road, even in its current residential configuration, presents an access challenge for emergency vehicles, specifically fire appliances. Access must support 12.5 tonnes according to the National Fire Chiefs Council guidance. Under building regulations, fire appliances require at least 3.7 metres between curbs for access (reduced to 3.1 metres for private drives). Standard UK fire tenders are 2.6 metres wide, whilst Range Road at the Nine Mile Ride end is 2.8 metres wide. The woodland can be a tinderbox in the height of summer, with wildfire a real risk. The banking of brash, felled trees and waste-tipped material following clearance of this site last October presents a further potential contributor to overall fire risk in the summer months. That risk, combined with limited fire appliance access and residents accommodated in prone mobile homes, which have a noted increased ignition risk, should be very strongly weighted in a planning decision. The proposed development fails to demonstrate that adequate access can be provided for fire appliances, which appears constrained in width and load-bearing capacity. The site layout does not clearly demonstrate that fire appliances can reach all parts of the site or manoeuvre safely. As such, the proposal would place future occupants at unacceptable risk and fails to meet established fire safety guidance.

##### **5. The proposal will have an irreversible impact on the character and appearance of the area:**

- The proposed development would introduce a range of built and semi-permanent features including a static caravan or mobile home, an amenity building and a touring caravan, hardstanding areas, utility boundary treatments and lighting.
- The proposal is on a wholly greenfield 'Countryside' site, with no repurposing of existing buildings possible (as per the 2010 Core Strategy paragraphs 3.11 and

- 3.22). No mention in the application is made of how many people the site is intended to accommodate. Once there is residential permission on the site, there is essentially no limit to the number of additional touring caravans that could be accommodated under permitted development.
- Range Road straddles an important green gap between the historic “Rides” within the remnants of the Windsor Forest. These woodland gaps are becoming rarer, so it is especially important to retain areas designated as countryside and preserved, as defined in the Finchampstead Development Plan. The applicant has already felled many trees on several sites. This should not be allowed to continue.



**Figure 6:** Image from GoogleEarth (date unknown, but post 2020) showing woodland at centre of image being proposed for this site.

- The urbanization of this countryside area would have a noticeably detrimental effect. The proposed site currently forms part of an *intrinsically dark woodland environment*. The currently unauthorized site adjacent to this current planning proposal uses long LED strips on the outside of mobile homes and an upward-facing floodlight attached to the fence on the roadside, which are currently left on all night, every night [Figure 7]. This is already having a huge effect on the character and appearance of the area – the creeping growth of urbanization with this application (and no doubt others to follow) will further erode that character and have a near-irreversible impact on wildlife (see below).
- Combined, this application will result in a visually intrusive form of development that is out of keeping with the established rural character of the surrounding area.



**Figure 7:** This photo shows the new Gypsy and Traveller pitch built without permission and (at time of writing) subject to invalid retrospective planning application **260577**. The area has been lit using caravan LED strip lights and LED floodlights, demonstrating the impingement on an inherently dark area of woodland and disruption to nocturnal wildlife. All light in this photo is artificial. Photo has meta-data showing location and date taken on the 18<sup>th</sup> March 2026 at 21:25 and is unmodified from the original taken with iPhone.

## **6. The proposal will generate environmental, wildlife, landscape and visual impact concerns:**

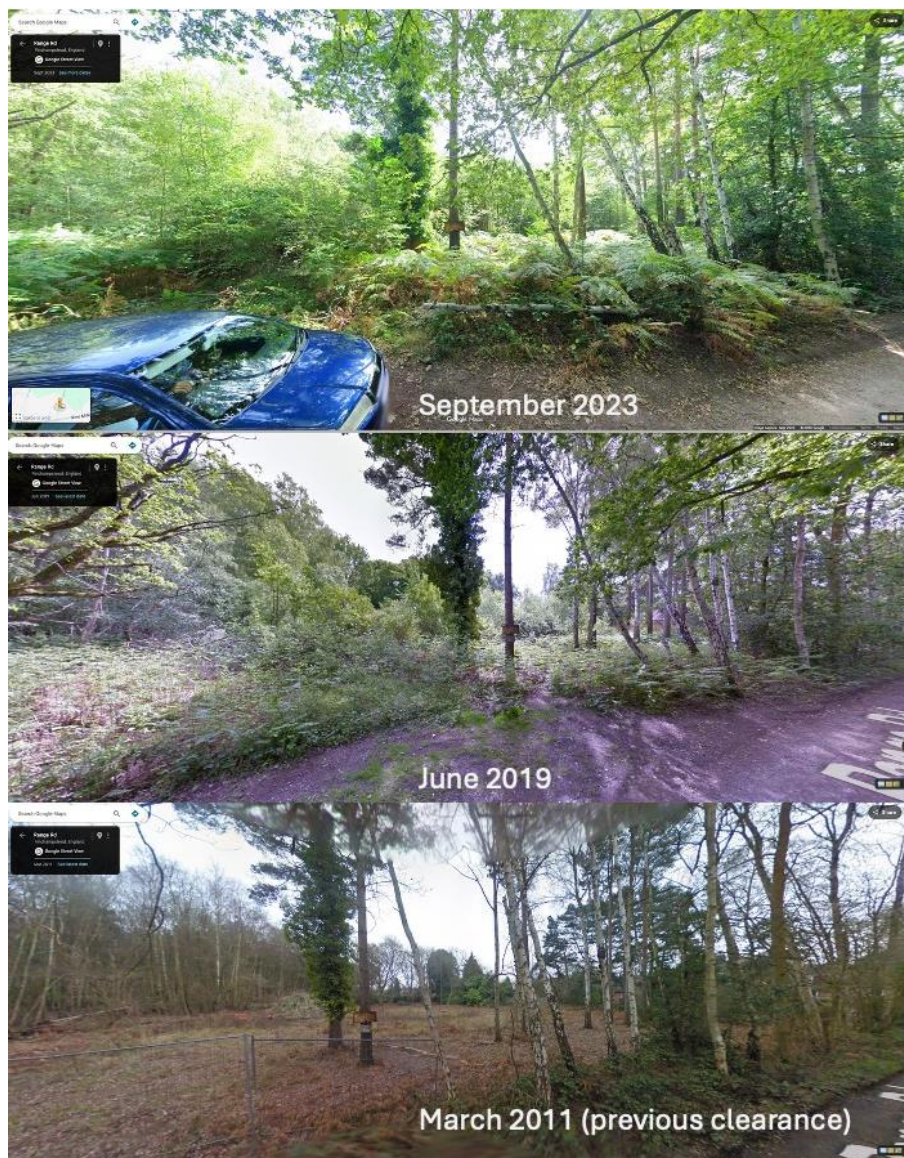
- The woodland adjacent to the proposed development site is rich with wildlife.
  - *[Personal Observation] I work adjacent to the woodland almost every day and photograph many of the species that I see. These include woodland birds such as the Great Spotted Woodpecker, the Green Woodpecker, the Eurasian Jay and the Common Pheasant. I also see Roe Deer (Capreolus capreolus) and non-native Muntjac Deer [collage on Figure 8]. Although unphotographed, we see hundreds of bats circling out of the trees at dusk seeking the plagues of mosquitoes associated with the standing water at the Sandhurst Road end of Range Road. The bug infestations make entering the woodland almost unbearable for residents in the summer months. I also frequently hear at least one Tawny Owl (Strix aluco) at night. More hidden are amphibians, reptiles (including slow worms) / snakes (Adders & Grass Snakes) and beetles (including the Stag and Rhinoceros beetles). For many of the reasons outlined below, I believe much of this wildlife will be at risk if this further development were allowed to proceed in designated woodland.*



**Figure 8:** Collage of wildlife sampled at the woodland adjacent to Range Road. Photos have been taken over a number of years. Meta-data, including location data, available for individual photos. Photos have been modified to fit in the collage. Unedited photos available.

- The so-called “ecological appraisal” (R3078\_PEA & BNG\_b) provided by the applicant’s representative is inadmissible in my opinion. The “preliminary” survey was conducted following site clearance in September-October 2025, not when the area was uncleared virgin woodland (e.g. images from September 2023 available on Google StreetView and personal photographs) [Figure 9]. Although many words are used in the planning statement to hide the true impact, the Biodiversity Metric calculation admits the considerable biodiversity loss inherent in this proposal, even when ignoring mandated baselines post-land clearance. The report itself notes legislation contained in the Wildlife & Countryside Act 1981 (as amended) and Habitat Regulations (2017) that states it is “... *an offence ... to deliberately, intentionally or recklessly disturb bats*”, despite the authors of the reports surveying the cleared site and providing positive recommendations where such an offence had literally just taken place.
- The Tree Survey & Arboriculture Impact Assessment (BS5837:2012) notes a “... *good tree cover is present on the site itself as well as adjacent sites, with many semi-mature and mature trees of both native and exotic origin characterising the local area*”. It is noted that this survey was carried out in January 2026, when trees were dormant. An experienced arboriculturist would have accommodated this, but it is perhaps more significant that, like the ecological report, this survey was carried out post-clearance of the land and immediately following the September-October 2025 destruction and removal of many less mature trees from the site. The removed and retained trees lent considerably to the character of the area and to the screening mentioned elsewhere in the proposal. A better characterisation can be found on Google StreetView from September 2023 and June 2019 [Figure 9]. It should be noted that the owner has carried out periodic clearance exercises on this and nearby land for the duration of their ownership, with the likely aim of preventing

repopulation of the woodland. Historical Google Street View images (e.g March 2011; [Figure 9](#)), show clearance of the land in the same configuration as now. On those images, (fly-) tipped large gas containers and discarded fridges can be observed in the cleared area. Moreover, the Arboriculture Report goes to great lengths to proscribe extreme limitation of the use of mechanised machinery in Root Protection Areas (RPAs), despite a digger having been used to clear the site in September-October 2025. For these reasons, the arboriculture report is self-fulfilling and is also inadmissible in my opinion. There is no statement regarding tree planting (and the semi-permeable hard standing would prohibit more natural growth).



**Figure 9:** Google Streetview images currently available for the Range Road location of application 260439, also previously known as “The Fords”. This shows the prior felling and clearance exercise in 2011 (note presence of caravan gas canisters left on site at that time and remain on site now, along with mounded clearance brash and topsoil which remained onsite until the 2025 clearance). The Photo in September 2019 shows the reestablishment of woodland, culminating in September 2023, the date of the most recent Google Streetview image.



**Figure 10:** Photo showing clearance activities at the Range Road location of application 260439, also previously known as "The Fords". This shows the use of mechanised machinery within RPAs, strictly prohibited in the later-produced Tree Survey & Arboriculture Impact Assessment (BS5837:2012). Photo has meta-data showing location and date taken on the 25<sup>th</sup> September 2025 at 21:05 and is unmodified from the original taken with iPhone.

- The site currently forms part of an intrinsically dark woodland environment. The introduction of permanent residential use associated with caravans and a day room would inevitably lead to artificial lighting, including domestic, security, and vehicular. This would result in light spill and skyglow, eroding the rural character of the area and causing harm to nocturnal wildlife, particularly bats. In the absence of a detailed lighting assessment demonstrating otherwise, the proposal fails to comply with national policy requiring the limitation of light pollution. The disruption to local wildlife is already evident with the current unauthorized development adjacent to this application [Figure 7]. The council must balance the likelihood of there being a "sensitive lighting strategy" fictionalized in the planning application versus the current reality of a permanent floodlit development (albeit unauthorized) in an intrinsically dark area.
- The application does not demonstrate that appropriate drainage and waste management arrangements are accommodated in this woodland site. The application makes mention of a "no dig" standard in a woodland area, but there are no service provisions currently in the development plan, despite the facilities already designed into the day room. The requirements for a mains water supply (or safe alternative) with adequate pressure and reliability, connection to a mains sewer or septic tank, and a safe electrical hook-up, are not currently considered in this permanent residential unit proposal. Any modifications of the site to accommodate such changes would require significant groundworks and disruption to root systems in a woodland area. Some of these works would additionally give rise to environmental health concerns if not completed to permanent residential standards.

- The addition of hardstanding, despite claims of a “no dig” adherence to policy, will dramatically alter drainage properties, playing an unpredictable (but likely harmful) role in this otherwise woodland site.
- Despite claims to the contrary, the site does not provide adequate screening now that the site has been cleared. The site is clearly visible from Range Road and surrounding properties, especially those properties backing on to the site from Nine Mile Ride. Boundaries surrounding this site are currently marked with 1-1.5 metre fencing, with easy ingress for wildlife through gaps. Almost all owners have made purposeful boundary decisions out of respect for the woodland, maintaining wildlife throughfare at the expense of privacy. If this development goes ahead, surrounding residents would be within their planning rights to erect less permeable and higher fencing surrounding properties, which would be to the detriment of free wildlife movement in the area, accelerating its demise.



**Figure 11:** View looking west from adjoining property on site. No screening is left following clearance. Cleared brash in foreground has been piled against fence. Silver Birch trees (including fallen tree) seen at northern end of site. Photo has meta-data showing that it was taken on March 14<sup>th</sup> 2026.

- The applicant felled trees and cleared the site in September-October 2025 [Figures 10-11]. It is noted that the applicant made no effort to remove (fly-)tipped waste from the site. Waste includes two large 47kg Propane Calor gas canisters used by caravans, at least one fridge, and discarded piles of wire fencing. This material, alongside trees and other natural woodland litter used to sustain the wood floor, has simply been pushed to the side and against neighbouring boundaries [Figure 12].



**Figure 12:** View looking west from adjoining property on site. Several caravan gas canisters have been (fly-)tipped in the woodland and have been there for at least 15 years. No attempt has been made to remove this waste during the most recent felling and land clearance. Note the Silver Birch in the foreground to the east of the site. Meta-data with this photo shows that it was taken on the 4<sup>th</sup> April 2026.

### **Previous Decisions Consistent with Declining this Application:**

- A recent appeal decision at land east of Warren Lodge, Warren Lane (**Ref: 242011**), confirmed the refusal of a Gypsy and Traveller development in similar rural circumstances. The Planning Inspectorate accepted the personal circumstances of the applicant but concluded that the harm to the character of the area and other impacts outweighed these considerations. This reflects a clear and established policy position. The current proposal would conflict with this established pattern of decision-making and should therefore be refused.
- Prior to this, there have been specific refusals for development on the same area of woodland referenced in this current application (and previously known as “The Fords”). Planning application **061483**, validated on the 22<sup>nd</sup> August 2006, for the “*proposed change of use of land to equestrian and erection of stables, hardstanding, new access, fencing and gates*” was declined. Reasons included that “... *the proposed development would result in the increased use of the substandard road junction with B3430 Nine Mile Ride, which would adversely affect road safety and the flow of traffic*” and that “... *the proposal would generate additional traffic on Range Road which is substandard in respect of width and construction and this would result in increased risk of accidents to road users*”. Neither of these reasons have changed. If anything, increased traffic on Nine Mile Ride with new developments in Aborfield twenty years later will have made these reasons considerably more valid in terms of access and safety.

### **Consideration of Restrictive Covenants:**

- It is understood that restrictive covenants on land are independent of planning law and that planning inspectors normally consider covenants to be civil matters. However, it remains important for landowners with similar titles in the area that no “*booths, caravan, show swings or roundabouts should be placed thereon*” in restrictive covenants associated with agreements in the land registry dating to 1922, 1946 and 1950.

**Conclusion**

While the need to provide accommodation for Gypsy and Traveller communities is recognised within national policy, such development must still be located in suitable locations and designed to minimise harm to the surrounding environment.

For the reasons outlined above, the proposed development represents an inappropriate form of development in this location and risks creating significant impacts on highway safety, landscape character, and local amenity.

I therefore respectfully request that the Local Planning Authority refuse planning permission for this proposal.

Yours faithfully,  
Dr. Neil Frewin  
Nine Mile Ride  
5<sup>th</sup> April 2026