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Dear Sir/Madam

**261722 - Full application for the change of use of agricultural land to a mixed use comprising agricultural use and one residential Gypsy and Traveller pitch, including the stationing of two static caravans, erection of a dayroom, provision of parking, access, landscaping and associated works.
At: Land at Leafields, Great Lea, Wokingham**

On behalf of our Client, Englefield Estate Trust Corporation Limited, Savills would like to register our strong objection to this application. The Estate has extensive land holdings in the area and considers that this is an inappropriate location for a gypsy and traveller (G+T) site.

Policy TB10 of the Adopted Managing Development Delivery Local plan

Policy TB10 of outlines the approach to the provision of G+T sites, stating that, *"Planning permission may be granted for new gypsy and traveller pitches or travelling showpeople plots or extensions to existing sites where it can be demonstrated that:*

- A) *"The site is located in the Borough's existing settlements or is adjacent to an existing settlement either within or adjacent to the Borough."*

This application site is clearly not in accordance with this criterion as lies in the middle of isolated ribbon housing in the open countryside outside Three Mile Cross. The Council has already considered the merits of this location for residential development, when considering application reference 241057 made in 2024, which proposed the erection of 4 houses on this site. There the Council concluded that, *"The proposal represents inappropriate unplanned development outside of and unconnected to any development limits within the countryside and contrary to the spatial objectives of the development plan."*

That same conclusion applies as equally to this new proposal as it did in 2024.

- B) *"Avoids impacting on the separate identity of settlements."*

This application would infill the current green gap along Great Lea, consolidating built form in a street scene characterised by loose knit residential development set well back from the street. The proposed layout is entirely at odds with the grain of development in the area.

- C) *"The site has access to a range of local services such as shops; health facilities including doctors, schools, and a range of amenities including play areas and other recreation facilities."*

Again, the Council has considered and rejected the sustainable credentials of this location when deciding the 2024 application, concluding,

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“The application site is within an unsustainable location that would not encourage a modal shift towards sustainable modes of transport and the occupiers would be reliant on private motor vehicles for basic day-to-day needs, by reason of the countryside location outside of settlement limits, distances to facilities and services, limited public transport links and poor quality of the walking/cycling an environment...”

The application site is on a 40mph stretch of road that has no pedestrian footpaths nor cycle lanes. In assessing the 2024 application, the Council Highways officer concluded, *“Highways have carried out an assessment into the walking environment and due to the lack of lighting on Great Lea, the lack of continuous pavements and the need to cross the A33 for most local services, it is unlikely that residents would walk, and that car use would remain the mode of choice. Highways would therefore conclude that this is an unsustainable location and that residents would have little or no option to the car.”* There is no reason to change this conclusion in respect of this new application.

- D) *“No significant barriers to development exists in terms of flooding, poor drainage, poor ground stability or proximity to other hazardous land or installations where conventional housing would not be suitable.”*

In determining the 2024 application, the Council concluded that, *“The proposed development involves the construction of 'More Vulnerable' development in Flood Zone 3. In the absence of adequate mitigation measures, the proposals would result in adverse flooding and surface water drainage impacts onto both the occupants of the site and neighbouring residential sites.”*

The current proposal continues to be for More Vulnerable development within Flood Zone 3. Our Client notes that the application is supported by a Flood Risk Assessment and Sustainable Drainage Strategy and has no doubt that the Council will be able to satisfy itself as to the feasibility of the proposed mitigation measures. However, Our Client would highlight its opinion that the Sequential Test enshrined in National Decision Making policy F5 should apply to this proposal. This Policy is within the 2026 National Planning Policy Framework (NPPF) and reads, *“The aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Where the test applies, development proposals should not be located in areas at risk of flooding where alternative sites, appropriate for the development, are reasonably available in areas with a lower risk of flooding.”*

It seems inevitable that there must be other sites within the Borough that could potentially accommodate this proposed development that are at less risk of flooding than this site. As such, it does not seem possible for this site to pass the Sequential test and so the proposal has to be considered contrary to Criterion D)

- E) *“Unacceptable impacts on the character and appearance of the surrounding landscape will be minimised through the sensitive and appropriate design of the scheme”.*

In determining the 2024 application, the Council concluded that, *“The proposed development will have a negative and detrimental impact on the landscape and character & appearance of the area by the loss of undeveloped open grassland in the countryside which eliminates the green gap between the existing development to the south and north and results in a urbanising development out of keeping with the rural character of the road.”*

Whilst it is acknowledged that this is a reduced proposal to this previous scheme, the fundamental conclusions should remain the same. This site remains an important green gap along Great Lea that benefits from mature trees and vegetation, and it seems inevitable that some of this will be lost to accommodate the proposal. The resultant urbanising impact will have a clearly detrimental impact on the character of the area, contrary to this Criterion.

- F) *“The proposals will not result in an unacceptable loss of amenity of neighbouring land uses”.*

The proposals will introduce static caravans and a day room to the immediate south of Hartley Court Farm Cottages, a row of residential properties that enjoy a secluded peaceful rural location. The Council should

consider whether the proposed day room could give rise to an undue level of disturbance to the occupants of these Cottages.

- G) *“Mixed use proposals (which are sites that include a business use) will only be considered if appropriate to the locality and such uses will not result in an unacceptable loss of amenity.”*

This is not relevant to this application.

- H) *“The scheme avoids any adverse impacts on the Special Protection Area.”*

This site lies within the 7km Linear Mitigation Zone for the Thames Basin Heaths SPA, so the Council should satisfy itself this proposal will not lead to any adverse impacts.

National Decision Making Policy HO12 – Traveller sites

This policy reads, *“Development proposals for traveller sites should be located so that they:*

a. Provide a settled base while recognising the extent to which traditional lifestyles (whereby some travellers live and work from the same location thereby omitting many travel to work journeys) can contribute to sustainability and may also mean that locations not well-related to existing settlements may be appropriate; and

b. Enable access to frequently used services, such as education, welfare and health services, including ensuring that children can attend school on a regular basis...”

It is clear that this policy, like local policy TB10, prioritises the location of new traveller sites in sustainable locations that have good access to education and health services. As discussed above, the Council has already concluded that this is not a suitably sustainable location. Furthermore, this policy is supportive of sites that allow traditional lifestyles where travellers live and work in the same location. That is not the case with this proposal so the allowances of Policy HO12 cannot be considered to apply here.

Other Matters

In determining the 2024 application, the Council concluded, *“The application site is located within the Urgent Protection Actions Area of the Detailed Emergency Planning Zone (DEPZ) for the Atomic Weapons Establishment, Burghfield. It has not been adequately demonstrated that the location of the proposed development can be safely accommodated having regard to the needs of Blue light services and the emergency off site plan for the AWE at Burghfield.”*

The Council will need to satisfy itself whether this reduced scheme can be safely accommodated, given the mitigation measures proposed within the application.

It is accepted that the Council cannot currently demonstrate a five-year supply of deliverable Traveller sites and will likely be unable to do so until the Local Plan Update is adopted later this year. As such, under the 2026 NPPF, Policy S5 now applies which supports, *“Development which would address an evidenced unmet need for gypsy, traveller or travelling Showpeople accommodation, provided it meets the criteria in policy HO12...”*

As discussed above, Our Client is of the opinion that this proposal does not meet the criteria of Policy HO12 so the lack of a five-year supply of traveller sites does not provide sufficient justification for this proposal.

In determining the 2024 application, the Council concluded that, *“Insufficient information has been submitted to enable the implications of the development to be fully assessed with respect to parking, turning, and visibility for motor vehicles...”* The Council should satisfy itself that the information supplied in support of this application is sufficient to allow a proper assessment of the likely impacts on highway safety.

Similarly, in determining the 2024 application, the Council concluded that, *“In the absence of adequate mitigation and monitoring measures, the proposals fail to demonstrate how the development would not have a harmful impact on biodiversity by reason of the development of previously undeveloped open grassland and the site’s proximity to Great Lea Pond, a designated Local Wildlife site. Additionally, the proposal has failed to demonstrate how a biodiversity net gain would be achieved and secured in perpetuity...”* The Council should satisfy itself that the information supplied in support of this application is sufficient to allow a proper assessment of the likely impacts on biodiversity.

Conclusion

From a review of both the current adopted Local Plan policies and the newly adopted National Decision Making policies within the NPPF, it is clear this site is not an appropriate location for a new G&T site as the policy approach is clearly to avoid sites in very rural isolated locations such as this with poor access to essential work, education and health facilities.

The Council has previously rejected the principle of residential development on this site and there has been no material change in circumstance to warrant a different conclusion being reached. Even if the Council were now minded to agree that this site does have potential as a G&T site in principle, this application demonstrates how, in reality, it is wholly inappropriate given the impact of the proposal on the local landscape, the potential to increase flood risk and the location within the DEPZ.

We would respectfully ask that this application is refused.

Yours sincerely

Peter Brampton

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