

Growth and Delivery Team -
Revised Growth Strategy Consultation
Wokingham Borough Council
Shute End
Wokingham
RG40 1BN

Our ref: 10318

21 January 2022

Dear Sir or Madam,

Right Homes, Right Places – Local Plan Update: Revised Growth Strategy Consultation

We are writing as planning consultants on behalf of Arborfield and Newland Parish Council and Shinfield Parish Council in response to the Revised Growth Strategy Consultation. We submit this letter to cover our key concerns rather than completing the Representation Form (November 2021) or the questions set out within the Consultation Document. This letter looks to cover the key topic areas of concern to the Parish Councils and relates this as closely as possible to the topic areas covered by the consultation.

Is the Strategic Approach the right approach?

The strap line for this consultation is 'right homes, right places' but we question whether the Council have achieved this with the proposed Revised Growth Strategy.

The Council are seeking to deliver a minimum of 15,513 dwellings over the plan period 2018-2038. This is a figure that many have challenged. These figures are significant, and it is questionable whether the Borough really should be planning for this number however, we appreciate that these numbers are being imposed by Government. Based on these numbers being questionable, we urge the Council to not plan for more than this Government imposed number. It is not appropriate for Wokingham to be identifying sites now that provide significantly more houses than required within the plan period i.e., to achieve the housing numbers only 2200 of the 4500 houses at Hall Farm are required therefore the higher number should not be planned for. Beyond this plan period it is unclear what the housing requirement figures will be and so this shouldn't be planned for now for this reason, including Hall Farm at this stage would



prejudice the outcome of subsequent local plan reviews. Furthermore, alluding to the larger development area would entice developers to seek planning permission for the larger scheme of 4500 homes resulting in the loss of this large area of countryside when potentially there isn't the housing need. The Councils' strapline should read 'right homes, right places, right time' and now is not the right time to be planning beyond 2038.

Furthermore, we are concerned about the continued desire of the Council to create a 'garden village'. It is not necessarily the most sustainable approach and doesn't truly work towards the vision and objectives set out within the Revised Growth Strategy. Failings of a 'garden village' comprise:

- Isolated/insular development that doesn't integrate with the wider community.
- Lack of opportunities for the existing surrounding developments to make use of and enjoy the new services/facilities/green spaces provided within the SDL due to accessibility challenges, lack of parking etc. meaning the Borough doesn't achieve its inclusive vision.
- Potential for the new community to serve only people from outside the Borough i.e., people wanting to move into the Borough, and thereby not serving the existing communities.
- Pooling most of the affordable housing provided in the Borough into one location.
- Lack of support for existing services / facilities as new residents don't use the existing centres meaning the existing settlements and their centres suffer economically.
- Lack of sustained vitality in the existing centres.
- Significant carbon emissions generated due to the enormous amount of development required to provide the transport networks / services facilities as well as the houses.

Para 4.5 of the Growth Strategy Consultation document sets out the previous clear preferences of the residents and the garden village approach does not address these preferences.

Whilst we agree that large scale developments are potentially the best solution to meeting development needs this can only be achieved if the 'right places' are chosen. Extending existing settlements with large scale development is a more sustainable option that would not only meet the preferences of local residents but would also achieve the vision and objectives of the Council more successfully for the following reasons:

- Through expanding existing settlements with large scale housing, it will bring about significant infrastructure changes / improvements for all the community, for example, if the Twyford / Ruscombe SDL was progressed this could bring with it a relief road that would serve the new and existing residents which would in turn provide a community benefit through reducing traffic travel through Twyford thus alleviating the congestion currently experienced. Due to the proximity of



the Twyford and Ruscombe SDL to the rail line there is the potential for a new railway station to be provided which would have significant environmental benefits through significantly reducing reliance on the use of the private car as this would also serve new and existing residents.

- Expanding existing settlements will minimise the carbon emissions generated by the actual undertaking of the development itself. The Hall Farm / Loddon Valley site is a significant greenfield site that has no infrastructure to note on site at present. The carbon emissions from the actual build out of the development would be significant to achieve the extensive network of roads, the new services, and facilities as well as the houses themselves. By siting large scale development adjacent to established settlements, such as Twyford and Ruscombe or north Wokingham (at Ashridge), a combination of some new services and facilities alongside expansion of existing services and facilities could take place thereby reducing the carbon impact of the completion of the development i.e., reduced materials required. If the right place is chosen there could be more sustainable transport options available to the residents to minimise carbon emissions in the long term i.e., access to a train station.
- Expanding settlements provides support to the existing communities and helps retain and enhance the existing settlements sense of place. It ensures people will continue to visit the centres, using their (enhanced) services and facilities thereby assisting vibrancy which will in turn enhance the economic sustainability of these settlements.
- Through large scale development adjacent to a few existing settlements it will ensure affordable housing is provided in a number of locations rather than focussing it in one location. This will provide choice to residents and will more likely meet the needs of the residents that need affordable homes.

Strategic Development Locations – Hall Farm / Loddon Valley SDL

To enable members of the public to understand how the Council have come to their current recommendation more readable / clearer information should have been provided. At present the evidence base has been presented in such a way that it is hard to fully understand how the Council has come to its current recommendation. For example, there is no clear comparison spreadsheet/table provided for the SDL's where the constraints are considered and the suitability of each of the sites scored/ranked. The only comparison tables that have been published are in the Sustainability Appraisal when considering each of the 12 Growth Scenarios (Table 6.2 of the Interim SA Report November 2021) meaning multiple sites/combinations of sites are compared/ranked.



Hall Farm / Loddon Valley is subject to a large number of constraints:

- **Flood risk / drainage** - Significant percentage of the site is flood zone 2 or 3 meaning it is unsuitable for development. These flood zone areas are currently identified as being land for green space / open space for members of the community to utilise and enjoy. If it is floodplain then this land could for significant periods of the year not in reality be accessible / safe due to flooding. Such a significant level of development here could have downstream impacts by increasing the likelihood of flooding in other already developed locations putting lives at risk.
- **Historic Environment** - Adjacent to the north-eastern boundary of the site is a Registered Park and Garden (Bearwood College Grade II*), there is a Scheduled Monument within the site (Site of St Bartholomew's Church), and there are a significant number of listed buildings (circa. 20) located on the site. In addition to this there are several areas across the site that are identified as having high archaeological potential. The Arborfield and Barkham Neighbourhood Plan identify Locally Valued Historic Assets classifying these areas as requiring special recognition with a view to them achieving formal protection in time. The importance / significance of the historic environment for Hall Farm / Loddon valley seems to have been downplayed in the published documents and there is no reference within the draft Policy SS3 to require conservation or preservation of the heritage assets on and adjacent to the site.
- **Landscape** - Shinfield PC and Arborfield and Newland PC both already have identified SDLs in their Parishes in the current Local Plan and these SDLs are being carried forward in the Revised Growth Strategy with South of the M4 SDL and Arborfield SDL continuing to be allocated. Hall Farm / Loddon Valley SDL will adjoin the South of the M4 SDL and bring large scale development significantly closer to Arborfield SDL. The landscape gap between Shinfield, Arborfield and Sindlesham will be lost to swathes of new housing. This fails to be noted within the Interim SA Report but it is clear that loss of landscape gaps due to other promoted sites has been a reason for them not being brought forward. Interestingly within the draft Policy SS3 there is the place shaping principle that the 'Development should incorporate measures to protect and retain the permanent physical and visual sense of separation of Arborfield, Arborfield Cross and Shinfield'. From viewing the proposed masterplan, it is hard to see how this is achievable with the large number of houses proposed. This continues to forget about how the northern section of the site would adjoin Sindlesham and merge development in this location. Intriguingly, Sindlesham is noted as being a tier 3 settlement and so not appropriate for expansion (para 5.4.79 of the Interim SA Report) however, the proposal for Hall Farm / Loddon Valley would expand the settlement.
- **Nature Conservation** – There are numerous Local Wildlife Sites across the site. A proportion of the site is located within the 5km Zone for the Thames Basin Heaths SPA with nearly the entire



site being within 7km therefore mitigation would be required to ensure no impact on the protected areas. The Interim SA Report therefore notes that they are subject to notable constraint due to ancient woodland, local wildlife sites etc.

- **Trees and Woodland** – There are many areas of designated ancient woodland across the site with some of these woodlands being identified as priority habitats furthermore there are many ancient and veteran trees on and around the site. So, whilst the Interim SA Report notes that there could be some potential to design in green/blue infrastructure there remains a ‘biodiversity risk’ for Hall Farm/Loddon Valley. Furthermore, in the Growth Scenario assessment it scores a ‘3’ when other sites such as East of Twyford and Ruscombe scored a ‘1’.
- **Transport** – The site is not currently well served by public transport with there being no railway station within close reach and with the bus route being poor meaning that there is significant reliance on the use of the private car to access Reading and Wokingham. Alternative sites such as Ashridge are noted as bringing potential strategic enhancements to the existing transport network through linking Bracknell and Reading more successfully, a benefit to the wider community. Twyford and Ruscombe has a main line railway station that provides easy access to London and has the potential to accommodate a new railway station. Developing Hall Farm / Loddon Valley could add a significant number of additional vehicle movements onto the local road network which could have a severe impact. Objective 1 of the draft Local Plan is ‘make the fullest contribution possible to the mitigation of, and adaptation to, climate change and the transition to a low-carbon economy’. It is questionable when allocating a site that has poor walking/cycling/rail connections to see how this can fulfil this objective. It will place significant reliance on the use of the private car which does not fulfil the Council’s intention to move to a low-carbon economy.
- **Air Quality** – Due to the proximity of the site to the M4 this boundary of the site is within an Air Quality Management Area (AQMA). Whilst it is noted that a significant section of the Hall Farm / Loddon Valley site that is adjacent to the M4 is proposed to be allocated for employment land there would remain a section of housing in the northern section of the site that would be near the motorway and therefore close to the AQMA which would be a negative health impact on any future residents within this area.
- **Noise and Vibration** - Due to the proximity of the site to the M4 there would be significant noise levels in parts of the site and the potential for vibration issues also. Again, whilst this would primarily affect the employment land, it would also negatively impact some housing.
- **Rights of Way** – There is currently some access across this site due to the existing network of public Rights of Way. This seems to be downplayed by the Council with a big play being made on



the opening up of land within the site through the proposed multi-functional green and blue infrastructure.

- **Geology** - There are sharp sand and gravel reserves across the site. Sand and gravel are safeguarded within the Minerals and Waste Plan meaning care should be taken to ensure the minerals (which are a finite resource) are not sterilised through development. If the mineral is proven to be viable, which is probable due to the site's location and size, mineral extraction should be required. Obviously, this will have to take place in advance of any development commencing. So, due to the extraction and subsequent infilling required there will be a significant delay to development commencing on the Hall Farm / Loddon Valley SDL. This could mean the 2200 houses may not be delivered within the plan period. Furthermore, the elongated timescale of development will be extremely disruptive to the local residents for a substantial period of time. There are other suitable large development sites that do not have any mineral constraints meaning development could come forward faster than at the Hall Farm / Loddon Valley site and thereby be developed within the plan period.
- **Viability** – The Viability Assessment published in Appendix 3 of the Strategic Sites Report (November 2021) does not cost for a new M4 Junction. A new M4 Junction is potentially required to ensure there is no severe impact on the local road network. As demonstrated within viability work for other sites, highway works such as this can come at a significant cost potentially to rendering new developments unviable. The certainty of whether the Hall Farm / Loddon Valley SDL is viable therefore remains uncertain.

We appreciate that on plan the Hall Farm / Loddon Valley site may seem very appropriate due to its connection to the employment area to the north of the river. Some of the Council's published documents place importance on housing coming forward on the Hall Farm / Loddon Valley site to facilitate the continued advancement of the existing employment area. However, through the granting of several planning permissions last year it is clear that the current market is clearly facilitating employment development desires in this area. There is nothing stopping this area of land coming forward for employment uses separate to the housing to the south of the river. There is significant existing housing within Wokingham Borough and the adjacent Reading Borough to sustain the employment aspirations.

Strategic Development Locations – Alternative SDL options

Due to the extensive list of constraints identified above for Hall Farm / Loddon Valley, we truly believe that a different growth scenario should be considered. From reviewing the growth scenarios set out within the Interim SA Report, we cannot understand why Twyford and Ruscombe SDL has not been considered



in combination with Ashridge SDL. It is recognised that there is not the need for the promoted sites to be developed in their entirety as this would exceed the housing figures for the plan period. However, a combination of slightly smaller housing numbers could successfully achieve the vision and objectives of the plan, for the reasons set out above, whilst minimising the impact on the identified constraints.

The siting of the Twyford and Ruscombe SDL within the Green Belt should not be a complete block to future housing allocation. Paragraph 140 of the National Planning Policy Framework (NPPF) identifies that through plan preparation or updating plans Green Belt boundaries can be altered in exceptional circumstances when fully evidenced and justified. It is appreciated that to meet the NPPF requirements of para 141 there would need to be some additional work completed by the Council, but we feel that with the significant levels of historic and continued development in the south it is appropriate to now start considering small boundary changes in the north. The Twyford and Ruscombe SDL has some major plus points to it with it being located on main rail line serving London, being of limited nature conservation interest and also not of landscape importance. The presence of the rail line with the potential for a new railway station means it is inherently more sustainable than Hall Farm / Loddon Valley as this does not have close or direct links to a railway station. The work completed to date demonstrates that a new defensible Green Belt boundary could be designed into any masterplan to protect the Green Belt in the longer term.

Proposed Policy SS3 – Hall Farm / Loddon Valley SDL

It is recognised that the last Local Plan did bring about some very good community benefits and improvements and that the Council will clearly be proud to promote these and remind the public (as per figure 1).



Figure 1 – benefits set out by Wokingham Borough Council in recent email correspondence to the public

However, the Local Plan and Planning Permissions haven't completely fulfilled their promises, and this is of concern to the Parish Councils. As noted within para 5.42 of the Growth Scenarios Report (June 2018) 'There are concerns about the timing and level of community infrastructure to be delivered at Arborfield SDL. Local shopping facilities would be welcome, especially if these negate some of the reliance on Wokingham town centre. There is widespread disappointment that a GP practice is not planned by the CCG for the SDL despite the opportunity existing in the adopted SPD, planning permission and lead developer aspiration'. In addition to this, we have been made aware that the new school built within the Arborfield SDL for the new residents has not been made available to the residents as it now provides the teaching space for all the pupils who used to attend Farley Hill Primary School as this school has now been closed. Children within the SDL are now being bussed to alternative Primary Schools. A completely unsustainable outcome.

There is rightfully concern that the proposed list of principles will not be fulfilled, meaning the 'garden village' is not the thriving, vibrant, sustainable development it is being sold as. The Council in any future



housing allocation and subsequent planning permission should ensure that there are tight controls put in place with timely triggers dictated to ensure all that is promised is delivered.

When considering the detail of the draft Policy SS3: Hall Farm / Loddon Valley Strategic Development Location it currently fails to do the following:

- emphasise the need to protect the protected trees across the site
- ensure there is appropriate protection given to the heritage assets to ensure they are conserved or preserved.

So, to conclude, Arborfield and Newland Parish Council as well as Shinfield Parish Council are rightfully very concerned about the proposed SDL at Hall Farm / Loddon Valley. The proposed strategic approach is not considered to be appropriate for this plan as it goes beyond providing the required housing and so not developing the right homes in the right place at the right time. There are alternative combinations of SDL's that could be considered to achieve the vision and objectives of the draft Plan meaning the plan will better serve the existing and future communities by achieving more sustainable developments than that currently proposed. Hall Farm has a significant number of constraints some of which appear to have been downplayed in the work published by the Council. There are failings in the draft Policy and there is grave concern that the principles set out within this policy will not be fulfilled in the longer term.

We hope that these comments assist the Council in the review and preparation of the Local Plan.

Yours faithfully,

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