



Barkham Parish Council

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Barkham Parish Council response to the LPU consultation

1. General Observations

- 1.1. Barkham has already accepted a huge number of new homes which will more than double the size of the parish by the time the Arborfield Garrison SDL is completed. This was facilitated by assurances given via current policies CP11 and CP18 that settlement separation areas would be protected.

A number of additional sites have been offered for development under the 'Call for Sites' exercise, including Barkham Square, which could treble the size of the parish, even before the full impact of this planned housing is experienced. Residents feel that 'enough is enough' and have expressed their concerns in a number of ways:

- Some 525 responded to the joint Arborfield and Barkham Neighbourhood Plan survey carried out in 2016.
- Around 200 residents wrote to oppose Planning Application 180596 for the development of land north and south of School Road.
- Over 4000 signed the petition 'Stop more Houses, Stop more Traffic'.

Three dominant concerns emerged from these consultations which must be recognised as part of this LPU consultation launched by WBC: i) Traffic, ii) Countryside and iii) Sustainability.

- 1.2. Traffic – increased congestion

The roads in Barkham and the surrounding area have changed little over the years and are very much a part of the rural scene of Barkham and the neighbouring areas. The main thoroughfares are mostly i) residential and ii) narrow tree-lined country lanes, none of which can be readily widened.

The planned Nine Mile Ride Extension and the Arborfield Cross Bypass will do nothing to alleviate traffic in this area. On the contrary, it will exacerbate the situation by funnelling further traffic into this area and, ultimately, along the entire length of Barkham Road towards Wokingham. Already queues being experienced on some roads are approaching the maximum predicted on completion of the SDL in 2026 with only 15% of the planned build completed.

- 1.3 Countryside – encroachment on valued rural and settlement separation areas

As far back as 2006, a report commissioned by WBC¹ confirmed that the Wokingham - Barkham Hill – Arborfield Garrison – Arborfield – Finchampstead North gap ***fulfils its essential***

function in the physical and visual separation of the settlements, it helps maintain the identity of the settlement, it contributes to the character and setting of the settlements and as such meets the criteria for retaining the gap designation’.

In the report of the examination of the Core Plan in 2009², the Inspector clearly expressed his views ***‘I agree with the Council that the new development should have a distinct identity and a clear separation from nearby villages, in order to maintain the character of the settlement pattern’.***

The inspector who reviewed the MDD in 2014³ proposed that it was not necessary to have a separate policy to protect these separation areas as CP11 was both strong and broad enough to provide that protection. However, it is important to note that he went on to say ***‘This is not to deny that settlement separation is important as the previous inspector supported the identification of ‘critical gaps’ in the SDLs on the CS key Diagram’.***

Yet only 5 years after the MDD, developments are being considered by WBC that will not only contradict their original view but would do untold harm to this rural area and the separation of settlements. Residents feel betrayed.

1.4 Countryside – Specific threat to areas such as The Coombes

A particular concern regarding the countryside was protection of valued woodlands such as The Coombes which provide attractive additions to the landscape, recreational facilities and varied habitats for wildlife. These concerns have been highlighted by activity on some of the plots recently sold by auction.

The decisive action taken by WBC – TPOs, Application of Article 4 and High Court Injunctions – demonstrates its strong support for these concerns and is applauded. This action must be portrayed to provide a deterrent for others who seek to push the boundaries on our important natural assets. Furthermore, all measures must be explored to provide additional protection from the outset.

1.5 Sustainability – lack of facilities

Much doubt has been expressed whether, with the notable exception of the impressive Bohunt School, promises made would actually be delivered. Lack of shops, insufficient school places, a medical centre and improved public transport were all mentioned. Additional investment would be required but this would only add to the traffic feeding onto the limited road network of the area!

With specific reference to Barkham Square (5BA010) being part of the adjacent SDL, the Inspector in the above examination of the 2009² Core Plan stated ‘the alternative site area (the combined sites) would not achieve any other sustainability benefits.’

2. Issues raised through the Neighbourhood Plan

A wide range of issues have been identified by residents through the Neighbourhood Plan process <https://www.arbarplan.com/NP-submissionplan-2018-09-26.pdf>

The Arborfield and Barkham Neighbourhood Plan Policy Matrix is shown in Appendix 1 and the Policies are briefly summarised below.

2.1 Sustainability (See NP section 3)

- a) Sustainability is the 'Golden Thread' which runs through planning, according to the Government's National Planning Policy Framework (NPPF). The NPPF suggests this should be achieved through a range of themes including sustainable transport, conserving and enhancing the natural and historic environment.
- b) Conversely building houses in an isolated area with limited transport and infrastructure is not sustainability
- c) The experience of the Arborfield SDL demonstrates that proposed infrastructure fails to be provided. It is to the credit of WBC that a secondary school has been opened, but items not within the gift of the local authority are slower to arrive – there is not even a single shop in the SDL and no sign of the proposed GP surgery.

2.2 Identity and rural setting

- a) Respect identity and rural setting of settlements, including scale and density of any development. The distinctive character of the varied landscape is valued. Important landscape views need to be retained: these are identified in the NP (Policy IRS1)
- b) Separation between settlements is valued. The Arborfield SDL was planned on the basis that it would be kept separate from neighbouring villages and this principle should be retained. (Policy IRS2)
- c) Protection of natural environment and open spaces, both for their amenity value and to avoid loss of biodiversity. A number of specific sites were identified for specific protection including The Coombes woodland and the rhododendron avenue along Bearwood Road. (Policy IRS3)
- d) Protection of historic character of the parish. Sites identified for specific protection include the lime grove at Nashgrove Ride and the granary in Barkham Street. (Policy IRS4)

2.3 Thriving Communities

- a) Existing facilities to be retained, replaced or enhanced. These include the community centres, open spaces and PROWs. (Policy TC1)
- b) New facilities required (some proposed in previous plan have not yet materialised. It is a particular bone of contention that CCG have proved unwilling to expedite any kind of plan for a GP surgery at the SDL. (Policy TC2)
- c) Small business and farming is supported. New or existing businesses are encouraged to reuse lawful buildings that are vacant, derelict or unviable. Best and Most Versatile Farmland, grades moderate to high (as defined by DEFRA on the Natural England website) should be retained for agricultural purposes. (Policy TC3)

2.4 Appropriate Housing

- a) The principle of new housing within the current Development Limits is supported, including the Arborfield Garrison SDL. The use of brownfield sites will be preferred. (Policy AH1)
- b) Housing for local needs should be prioritised. The NP contains a Housing Needs Assessment. (Policy AH2)

- c) Development outside the development limits will not normally be permitted in accordance with Core Strategy Policy CP11. If exceptionally any sites are to be consented then, in common with the approach adopted for the Arborfield Garrison SDL, approximately 50% of the site should be open space, excluding the area occupied by highway infrastructure.
- d) Design criteria. All new developments must reflect the rural character and historic context of existing dwellings within the Plan Area. New developments must deliver good quality design. (Policy AH4) Drainage and sewerage. New developments co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Encourage tree planting. As a standard, a new tree should be planted to replace every one that is removed. (Policy AH5)

2.5 Getting Around

- a) Unsuitable roads. The nature of country roads and the limited public transport infrastructure must be recognised and respected. The NP lists types of roads considered unsuitable. (Policy GA1)
- b) Greenways. Development proposals must retain and protect and, where possible, take available opportunities to improve and extend the networks of Greenways and other PROWs. The NP includes a detailed Greenway study (Policy GA2)
- c) Public transport. As a general principle, improvements to public transport will be supported, recognising that schemes must have the prospect of long term viability. Where additional bus routes are anticipated in the SDL, planning must ensure that roads to be used have adequate width for buses to pass and that road junctions are able to facilitate the safe manoeuvrability of full length buses (Policy GA3)

3. Site Assessments

The Site Assessment Engagement Forms (Appendix 2) completed during November 2016 identified limitations of all the sites offered for development before the feelings of residents had been so clearly expressed. These have now been updated to include any updated information and some additional sites. Comments have also been added for those sites on the Parish boundaries (Appendix 3) where they contribute to the overall picture.

This exercise highlighted that housing needs to be sustainable and affordable, where traffic congestion is minimised by developing sites located close to main arterial routes and not country lanes. There must be scope to provide cost effective infrastructure where land prices are not driven by developer/landowner led initiatives. Building on green-field sites in the area does not make sense and the countryside should be preserved by focusing on brown-field sites; this is discussed further in the response to Q21 of the LPU response form.

For completeness, other important topics identified by residents include: impact on country walks, views, setting of historic buildings, possible loss of agricultural land and flooding.

4. LPU Survey Comments

The survey primarily focuses almost exclusively on housing while ignoring other issues, as outlined above.

- 4.1 Barkham Parish Council has completed the LPU Response Questionnaire online on the 20th February and a brief outline is given below.

- a) Preference is for a new settlement, most likely at Grazeley.
- b) There should be a mix of housing types, especially starter homes and including shared ownership, rent to buy and for key workers.
- c) In principle, increasing building heights should be considered. Higher buildings are appropriate in town centres but is not appropriate in more rural locations such as the South Western Area. There is limited scope for higher buildings in Wokingham: for central Berkshire, the focus has to be on more medium rise apartments in Central Reading and to a lesser extent Bracknell.
- d) Clearly higher building heights are appropriate for apartments. These should aim to provide low cost homes which younger people can actually afford to rent. Also, older people should be a target market, allowing an ageing population to lead an active existence well into their later years and where facilities need to be closer to hand.
- e) Employment should be concentrated in or adjacent to existing employment areas.

4.2 In the South Western area, BPC sees little scope for new development.

- a) Development of site 5BA018 (A1 scrap yard) could be supported with the following provisos:
 - Only the brownfield part of the site should be developed
 - A strip of woodland needs to be retained along Bearwood Road. This would contribute to the rhododendron avenue and would create the opportunity for a north-south greenway segregated from the east of the road.
 - The adjacent Fox Hill woodland should also be excluded from any development (this is mainly in Wokingham Town). This area is well used as an amenity area for Woosehill.
 - The site would of course have to be decontaminated.
- b) BPC would be opposed to development of 5BA027 or 5WK022 being included as part of this development as this would join Barkham to Wokingham.
- c) BPC has updated the full site assessment of all sites in Barkham, originally submitted in November 2016, along with a summary of sites adjacent to the Barkham border.
- d) With exception of A1, ALL other sites offered under the 'call for sites' exercise are unsuitable for development as there is poor access that will contribute to increased traffic congestion in the immediate and surrounding area, they will encroach on much valued countryside which forms important settlement separation areas and will increase demand on struggling facilities.
- e) In particular, the sheer scale of the proposals being developed for Barkham Square (5BA010) is such that it will dominate the centre of the parish – it forms an important separation area and has particularly poor access. A cluster of sizeable sites around School Road would encroach on another rural location and add to the already significant traffic difficulties in School Road (these include 5BA014, 5BA015, 5BA016 etc.) as would a number of sites across the parish border in Arborfield (including 5AR007, 5AR008, 5AR009, 5AR010, 5AR012 5AR018 etc.).
- f) Possible sites which have not been put forward include Stay Sure Tyres in Langley Common Road and land to south of Highland Avenue (ownership unknown).

5. National Policy Issues

It is apparent that Wokingham, and no doubt other authorities, are suffering from shortcomings in the NPPF. WBC needs to raise these points at ministerial level.

- a) Housing targets and land supply. The current methodology is open to manipulation, especially as it allows developers to put forward land with no obligation to build within a reasonable timescale. Meanwhile the local authority has little control over delivery.
- b) The failure of the NPPF to provide realistic guidance on transport issues. Everything hangs on defining “severe” in NPPF para 109. This effectively means that incremental development should be allowed on roads that are already congested.
- c) The failure of the NPPF to define sustainability, particularly with respect to climate change. In practice sustainability is assessed on the basis of local criteria such as proximity to shops, GP surgeries and public transport which are not actually deliverable by the planning process. The wider issue that creating dispersed settlement patterns being incompatible with a low carbon economy is completely overlooked.
- d) The difficulty of protecting sensitive countryside (e.g. The Coombes), particularly as there are many landowners who are prepared to flout the planning system.
- e) The appeal system which is unfairly weighted in favour of the appellant in terms of recovery of costs. This undermines the basic principle of equality before the law.
- f) The ineffectual enforcement system which can take many years to complete. Some kind of fast track mechanism is required so that breached of planning rules can be quickly resolved.

Attachments

Appendix 1 - Arborfield and Barkham Neighbourhood Plan Policy Matrix

Appendix 2 - BPC Site assessment for Barkham

Appendix 3 - BPC Site assessment adjacent areas

References

1. Assessment of Gaps and Green Wedges within Wokingham District, Chris Blandford Associates, 2006
2. Report on the Examination into Wokingham Borough Core Spatial Strategy Development Plan Document, LDF 000315, 27 Oct 2009
3. Report on the Examination into Wokingham Borough Council Managing Development Delivery, Ref: PINS/X0330/429, 23 Jan 2014