

Regulation 19 Objections to Loddon Garden Village

General

Comparing the 2020 and 2021 Sustainability Appraisals, it is remarkable how taking the Hall Farm site from 1,000 houses to 4,500 houses has made such a difference in the scoring used by AECOM. On a 4-point scoring system, Hall Farm improves its rating in a number of categories including; Accessibility from 3 to 1, Air Quality from 3 to 2, Economy from 2 to 1 and Transport from 3 to 1. This highly dubious scoring system was highlighted by Bell Cornwell, the planning consultants commissioned by Arborfield & Newland PC. In its Reg 18 consultation response Bell Cornwell highlighted the significant number of constraints with the Hall Farm site, which did not appear to have been taken into account by the 2021 Sustainability Appraisal.

Scenario comparison

By the time we get to the 2024 Sustainability Appraisal for the Reg 19 Submission Plan the situation is that seven scenarios are shown. Six of these scenarios involve Loddon Valley Garden Village (Hall Farm) in various combinations with other sites. Ashridge is shown as the only scenario without LVGV, but Twyford is not shown as a standalone option. But Twyford is shown as an option with LVGV. If WBC truly believed that LVGV had to be in the Reg 19 plan because it was included in the Reg 18 version, why was Ashridge without LVGV ever an option? Equally, if Ashridge is a standalone option without LVGV, why wasn't Twyford a standalone option?

Public Transport

Reading Borough Council remarked during the 2021/22 consultation "accessibility to central Reading and the rest of the urban area is currently extremely poor". This proposal will encourage greater car use as there is no Public Transport available on site. Expectations that people will cycle or walk are unsubstantiated. Very optimistic assumptions on walk cycle and bus use given the demographics locally as described in LTP4. No detail anywhere except cost estimates of what bus priority measures to be implemented and what negative impact on traffic this will have. The degree of success in transfer to bus will rely heavily upon very high levels of bus priority measures which are yet to be detailed and tested.

The Traffic Assessment Report (TAR) alongside the Local Transport Plan (LTP4) quite rightly highlights the important role of public transport in reducing car journeys. Yet the solution offered by the TAR of a Rapid Transport System (RTS) with initially high frequency buses, seems hopelessly optimistic. The current Leopard bus service through Arborfield is neither frequent nor rapid. For a truly game-changing RTS to be put in place significant investment is required, not only in terms of the physical infrastructure but also in terms of subsidising operating costs in the early years to get the system established.

Further, for the proposed transport system to work there will need to be a new road through the site, which is in breach on the Arborfield and Barkham Neighbourhood Plan at the Western (Observer Way) end and cuts through a recently established SANG at the Eastern (Hatch Farm Way) end and may even be illegal. The other way out of the site for buses is over a new bridge over the M4. This will be hugely costly (I believe well beyond the sum contained in the LPU costings) and be a massive intrusion on the landscape. I hope that by the time we reach the inspection we will have some professionally prepared visualisations that will show this very clearly.

ASB

As well as representing SOLVE Hall Farm I am Chair of Trustees at Arborfield Village Hall, a Parish Councillor for Arborfield and Newland and the Secretary for the Fields Neighbourhood Action Group. Over the past 11 years of living in this area I have been increasingly concerned with the rise in Anti-Social Behaviour (ASB) to the point where it is now becoming a serious concern at Borough level and a significant cost to many local Parish and Town Councils, including my own. Most of the people I talk to regarding this believe it is a lack of useful engagement activity for young people that is at the heart of this problem. The rise in housing in the South of the Borough has not been matched with a rise in useful activities for young people in particular, and a lack of community facilities in general. It is not enough to put in a few sports pitches, what is needed is some form of meaningful engagement. SOLVE Hall Farm suggested the Hall Farm site offered the opportunity for greater community engagement based around rewilding and circular economies such as natural materials. The use of the heritage of the area to create a living history area is something I consider to be a great opportunity to combine leisure with education. Providing a “community centre” and some leisure facilities is not enough to make a community. People need to be involved and connected, and a good way to do this is through care and nurture of plants and animals. Community farms are well established in inner city environments such as London and Bristol. This site has the potential to provide social enrichment alongside healthy, locally grown food. A key component of making this labour intensive, environmentally sensitive, community farming workable would be to involve the local community as voluntary labourers. In line with best practice from other successful Community Farms around the country investing time, effort or money could be rewarded with a share of the produce. A farm shop could also be set up to sell produce direct from the fields to visitors. Children, students, volunteers and specialists could be brought together to work the land and manage the site, provided they are given suitable guidance and safeguarding measures. This is an observation on the current LPU proposals, and also on previous SDLs at Arborfield Green and at Shinfield.

Heritage

The plan is in breach of the Arborfield and Barkham Neighbourhood Plan which lists the avenue of trees running between the old rectory and the old churchyard as a valued local heritage asset. The spine road proposed to enter the site from the roundabout on junction of Reading Road/Observer way will cut across this avenue of trees. Projected width of road is up to 30 M. Will this involve cutting some down? What of damage to tree roots by excavation, then by

traffic? Effects of particulates and noise from cars, lorries, buses using the road. Nearby Scheduled Monument: Old Churchyard will no longer be in isolation but will be surrounded by houses. Also, Grade II Listed farmhouse nearby. How will these assets be enhanced and protected? Possible impact on other important heritage assets such as Carters Hill and Bearwood College.

Waste water treatment

The Water Treatment Plant for Arborfield is already overloaded during times of heavy rainfall and is known to pump untreated sewage into Barkham Brook. Barkham Brook is known to be a habitat for threatened native white clawed crayfish. Thames Water, who are responsible for the required upgrade are in dire financial problems and have recently been fined £104 million by Ofwat for sewage pollution, the largest fine ever imposed on a water company:

Thames Water was found to have routinely used emergency relief valves on the sewer network to release sewage spills, instead of only using them in exceptional circumstances. The company was also found to have a link between high sewage spill levels and operational issues at sewage treatment works. If this pollution of important biodiversity habitat continues endangered native wildlife will be lost. (The endangered White Clawed Crayfish has been identified as living in Barkham Brook).

The Arborfield Water Treatment Plant would need to be upgraded immediately, before any new houses are built, as the system for water treatment is already seen to be failing. There are also concerns that the utility company themselves are failing and may need to be put into public ownership. Nearly 70% of Thames's treatment plants had operational problems, Ofwat said, and 16% of its storm overflows were operating in breach of their permits and therefore illegally. The UK's biggest water company, which has 16 million customers in London and the Thames Valley, has a £15.2bn debt mountain and has said it has enough cash to continue trading until at least May 2025. If it fails to secure fresh investment it could be placed [into a special, government-handled administration](#).

Disproportionate distribution of growth

The Plan is constrained by Green Belt to the North and AWE Exclusion Zone to the West. This means 97% of development in Wokingham has been in the South of the Borough over the past 10 years. Having promised they would produce a revised Local Plan, WBC waited two years then claimed that they couldn't make changes after all, despite officers confirming that they could. They then claimed that sites couldn't be changed without permission of the landowner, only to be again found to be incorrect. This is also contributing to the sense of injustice felt by many who live in the South of the Borough, particularly when the North of the Borough is seemingly protected by its' Green Belt status. I have made a Freedom of Information Request to Wokingham Borough Council asking three things:

1. Was a Planning Performance Agreement signed between Wokingham Borough Council (WBC) and the University of Reading (UoR) regarding the Loddon Valley Garden Village (LVGV) development, currently proposed within the Local Plan Update (LPU)?
2. How much did it cost UoR or pay WBC?

3. When was it agreed?

I believe that a PPA was agreed between WBC and UoR re: LVGV. I hope that by the time of the Public Inspection I will have the evidence as to who signed it and when. It is my contention that this agreement constitutes Predetermination on the part of WBC. Predetermination can be unlawful and can make a decision unlawful. For example, in local government, a councillor who makes a decision based on predetermination could be bringing their office into disrepute.

This is particularly galling given that WBC denied SOLVE Hall Farm a debate on the LVGV on the grounds of predetermination. We have never had a proper consultation, all we get are "Show and Tell" events. Other viable or even better alternatives are not being given proper consideration. E.G. If the AWE Exclusion Zone and the Green Belt were consolidated into one area the opportunity would be created for a more equitable distribution of houses across the borough. It might also make a more sustainable development possible by building next to the Elizabeth Line near Twyford.

Traffic

The residents of Arborfield & Newland Parish already live with extreme traffic issues at peak times during the day or during periods of bad weather where flooding regularly causes road closures. In particular there are recurring traffic problems at Mole Road, Mill Lane and Lower Earley Way. Basic traffic surveys are all at Nov 2021 which was very soon after the last lockdown and still affected. Quite a bit of new development since then. Vissim Model is purely highway despite reliance on assumptions of transfer to bus. Very optimistic assumptions on walk cycle and bus use given the demographics locally as described in LTP4. No detail anywhere except cost estimates of what bus priority measures to be implemented and what negative impact on traffic which are not modelled in Vissim. The degree of success in transfer to bus will rely heavily upon very high levels of bus priority measures which are yet to be detailed and tested. Assumptions that some background traffic will get diverted elsewhere beyond the Vissim model but these impacts are ignored. Infrastructure modelled in Vissim does not always coincide with what is included in the cost list in the primary document.

Health and wellbeing

A development of this scale will have around 10,000 residents by 2040. At 2,000 patients per G.P. and each G.P. requiring 199 minimum General Medical Services (GMS) space there is a requirement for around 1,000 square metres of GMS. There is no indication of where this space will be located. "Nature of provision to be finalised following completion of feasibility study" and after completion of 1,000 homes. Medical services are already overstretched with the existing population. Arborfield Green SDL was "promised" a medical centre but this has still not happened, despite the 3,500 houses built there.

BMV Agricultural land at LVGV

9.11.1 states that LVGV likely includes significant BMV agricultural land. It goes on to say uncertainty exists as none of the site has been surveyed. Building on land classified as "Best and Most Versatile" (BMV) is generally not permitted under current planning policy. BMV land is the most productive agricultural land and is given more protection than less productive land.

CPRE state that Maintaining agricultural capacity to deliver significant levels of domestic food production is critical for our national food security.

Climate resilience

B4.4. a) Development guidelines, Concept rationale. indicate the LVGV should achieve climate resilient neighbourhoods. The proposal should be for “a climate positive development that will not require carbon offsetting”. What this means is that, over the course of any given year, whilst there will be times when the development imports electricity/power from the national grid, it will export more than it imports. Furthermore, the proposal should be for a climate positive development that minimises the need to import from the grid, via a major focus on storing heat and power. Specifically, the proposal should seek to maximise the potential for power generated from onsite solar PV to feed the development directly (and therefore minimise the need to draw power from the grid) by utilising large scale battery storage. The proposal could also include a heat network at the district centre, combined with thermal storage. In doing so, the amount of electricity needed to generate heat is minimised. Ideally the site would generate enough renewable energy to not only sustain itself but also to generate enough to export some energy to the wider neighbourhood.

Flooding

As a resident of the area, I am acutely aware of the underlying geology. We are situated on top of a lot of clay, which is highly impervious when constructing “soakaways”. Shinfield is known to be a flood plain, and quite rightly, the LVGV housing proposals avoid building on the high risk flood plain. However, I live just below the Bearwood Lake, and I am also very aware of the risk posed by the category A dam between my house and many millions of gallons of water. The dam was recently upgraded, with assurances received from WBC at the time that over topping of the dam would be extremely unlikely. However, in light of recent events in Valencia, when a years worth of rain fell in a few hours, it is increasingly clear that these extreme weather events are becoming more common as a result of climate change. The Plan is proposed to be built over 30 years and global warming is not only likely to increase, it may even accelerate as polar ice caps are melted and less heat is reflected but is instead absorbed. Are the developers sufficiently confident in climate change predictions that over topping of Bearwood lake, across Mole Road, and into the new LVGV will never happen?