



Earley Town Council

Response to the Local Plan Update: Revised Growth Strategy Consultation November 2021

Introduction

Earley Town Council (ETC) welcomes this opportunity to comment on the Local Plan Update: Revised Growth Strategy. ETC would have preferred a longer response period to allow for considered, co-ordinated consultation responses with relevant third parties such as resident associations, facility users and community service providers. ETC provided a substantial response dated 16th March 2020, to the earlier version that targeted major housing growth at Grazeley. ETC also responded in detail to the additional consultation relating to Local Green Space designation by a response dated 18th June 2020. All the comments in our previous submissions still apply where relevant.

ETC considers that Hall Farm/Loddon Valley Garden Village as currently proposed, is not a suitable area for the major development proposed because of the potential, massively detrimental effect on Earley residents. Reasons leading us to this conclusion include the potential of flooding of existing properties in Lower Earley and massively increased traffic congestion in the Lower Earley and Shinfield areas.

Whilst ETC acknowledges that the loss of the potential strategic allocation of Grazeley for large scale development is problematic, ETC has a number of concerns with the proposal for a “Garden Village” on the land generally referred to as Hall Farm. These are detailed in Section 1 below. A “Village” involves a centre that brings together the community of the village. Hall Farm would need a village centre with shops, entertainments, sports facilities, meeting places including religious buildings, nurseries and health care facilities to name but a few. ETC considers that the proposal as described in the Local Plan Update does not aspire to this. ¹

ETC is pleased to see the significant increase in the number of recommendations for Local Green Space that have been added across the Borough in this update. The next opportunity would not be for many years, so it is important that ETC secures protection of as many spaces as possible in our Town in this current update.

¹ The Local Authority Building Control (LABC) which represents all local authority building control teams in England and Wales) defines a Garden Village on their website as having between 1,500 to 10,000 dwellings and having its own community infrastructure with good transport links, GPs and schools which in turn would help to create new jobs and boost the local economy, so it does not present a burden on existing communities. See <https://www.labcwarranty.co.uk/blog/new-garden-villages-to-help-tackle-housing-shortage/#:~:text=What%20is%20a%20garden%20village,of%20over%2010%2C000%20new%20homes>

ETC is grateful that many of the nominations submitted in our response, dated 18th June 2020, have been assessed and recommended for inclusion in the Updated Local Plan. For the residents of Earley, it is particularly important to have their Local Green Spaces protected from development as they provide local, well used, recreational facilities and/or amenity areas supporting physical and mental well-being. ETC asks that the small number of our previous suggestions that have not been recommended for acceptance, are reconsidered: ETC considers that they do have one or more of the attributes of recreational value, historical value, ecological value, tranquillity value, and are of local significance, which are elaborated on in Section 2 below.

ETC would also comment on Policy HC4, on page 214, paragraph 1, of the Right Homes, Right Places document and suggests that any development on Local Green Space is only permitted when it is consistent with Green Belt Policies, to add additional protection to these spaces. The supporting text of the draft LGS Policy should be strengthened in order to reflect national guidance within NPPF requiring consistency with Green Belt. This should be amended to read *'The Council has identified and will protect from inappropriate development all Local Green Spaces shown on the policy maps. Development proposals within a Local Green Space will be assessed against national Green Belt policy.'* See further detailed comments on the HC4 policy in Section 3.

1 Garden Village at Hall Farm

ETC notes that the current Local Plan Update: Revised Growth Strategy Consultation takes account of the loss of Grazeley as a strategic allocation of land for development and that this is, in part, replaced with a "Garden Village" at Hall Farm/Loddon Valley. ETC considers this proposal is not suitable for this scale of development due to the highly detrimental effect on the existing mature developments of Lower Earley, Shinfield, Arborfield and Winnersh for the reasons set out below.

Whilst ETC acknowledges that Central Government are setting targets for new housing numbers, ETC considers that it is not appropriate or sustainable to attempt to meet such targets by means of a single, large development of 4,500 units immediately adjacent to areas already struggling with insufficient infrastructure.

The following comments also have regard to the on-line presentation made in early December at which some additional detail was available.

1.1 Flooding especially downstream

The land comprising Hall Farm/Loddon Valley is currently agricultural in nature and as such, in conditions of heavy rain, a great deal of the water is absorbed into the land providing vital attenuation before finding its way into the River Loddon and its tributaries. Extensive flooding still occurs downstream of this area, particularly around the Showcase Cinema and Lower Earley Way. This has been on a regular basis, notably and disruptively in 2007, 2009, 2013, 2014, 2019 and as recently as February 2020. This results in the blocking of Lower Earley Way by the Moat House/Best Western/Hilton Double Trees Hotel roundabout and the southern half of the Showcase Roundabout which obviously causes massive (albeit short lived) traffic disruption.

The image below is of Showcase Roundabout, taken in February 2020.



The next image is of the Tesla charging station adjacent to Lower Earley Way and was taken in December 2019. This event made Mill Lane and Lower Earley Way impassable on the west side of the adjacent roundabout.



Similar flooding to that shown in the image below, taken in 2014, occurs nearly every year.



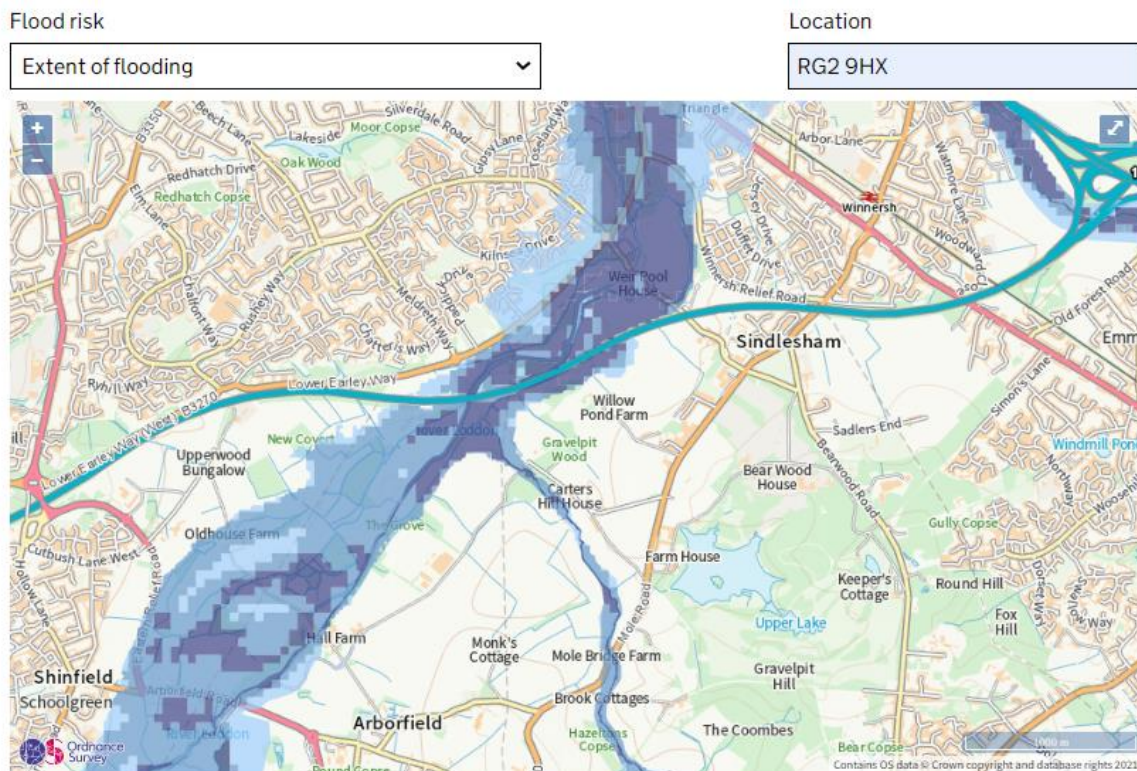
Science forecasts that weather extremes will get worse and more frequent; therefore, turning agricultural land into dense urban residential areas would result in effectively hard paving the land – perhaps by as much as 70% of the area. In turn, this means falling rain would almost immediately run off into the rivers and streams. This would increase flooding in the general area of Hall Farm and downstream in properties in Lower Earley adjacent to Riverside Park and in Woodley along Colemans Moor Road.

The screenshot on the next page is taken from the Gov.uk website ² on the 27th December 2021 and clearly shows large parts of the proposed development and nearby, to be HIGH Risk. This map is considerably more up to date than that referred to in documentation supporting the Hall Farm development, which seems to date prior to 2011.

² <https://check-long-term-flood-risk.service.gov.uk/map?eastings=474973&northings=168134&map=RiversOrSea>

Learn more about flood risk

Select the type of flood risk information you're interested in. The map will then update.



ETC would comment that the Policies in the 2014 Development Plan are nearly 12 years since being written and may be considered to be out of date. ETC considers that all current scientific knowledge about future extreme weather events should be given greater consideration. Policies CC09 and CC10 take account of the recommendations in the Wokingham Borough Strategic Flood Risk Assessment (SFRA) (2012) (CD10.03.01) which makes the policy more locally specific. This approach is consistent with paragraph 7 of the Technical Guidance to the National Planning Policy Framework (NPPF). ETC notes, however, that the Strategic Flood Risk Assessment is now over 10 years old.

ETC believes the proposed development would not be able to comply with all CC09 policies, particularly, paragraph 3 – where the Sequential Test requires that flooding is not worsened on the Application Site and elsewhere (*our emphasis*). ETC also considers that compliance with CC10 Sustainable Drainage, paragraph 2(a) - where run off rates must be the same as a greenfield site - would not be possible.

ETC notes that the on-line presentation made mention of extensive flood alleviation measures such as attenuation ponds and land build-up to make the development viable, but there is little detail about these in the update document. ETC would seriously question whether avoiding flooding both on the Hall Farm location and downstream would be possible in the expected future, worsening climatic conditions.

1.2 Road infrastructure – existing and proposed

1.2.1 Existing

Pre-Covid, the main feeder roads along the south of Lower Earley, notably Lower Earley Way, the Moat House/Best Western/Hilton Double Trees Hotel Roundabout, the Shinfield Arms Roundabout and the Showcase Roundabout, were all points of major traffic delays due to the sheer weight of traffic. These delays were clearly exacerbated in the early morning and evening commuting periods. This is clearly indicated in Fig 15 Traffic Congestion, page 42 of the Local Transport Plan 2011-26 (LTP), but ETC is concerned that is based on quite old data.

ETC notes that the Borough of Wokingham has one of the highest proportions in England of household car ownership as indicated in the LTP. Observations in the numerous local “new” developments in Shinfield such as Fullbrook Avenue clearly show car ownership is still extremely high and due to planning policies, that only require limited parking on the curtilage of properties e.g. only 2.4 spaces for four bedrooms and the 0.4 can be on the road, this leads to high levels of on-street parking further exacerbating traffic movements, particularly for larger vehicles such as emergency services, buses and deliveries.

The proposed Hall Farm development would create a very high number of additional car journeys at both ends of Lower Earley Way, adding very substantially to the existing congestion. The addition of 4,500 units could easily represent something like 7,000 to 9,000 additional vehicles in the area and these would add to an already heavily congested existing road network despite the measures indicated in the Draft Infrastructure Plan.

Traffic flows through Shinfield, Spencers Wood, the A33 Relief Road and particularly Junction 11 on the M4 is already compromised by sheer weight of traffic, especially during rush hours. A very high proportion of traffic from Hall Farm transiting to the motorway or Reading would add massively to current problems.

1.2.2 New roads

ETC notes from the documents available that a new main feeder route is proposed across a high-risk flood plan adjacent to Lower Earley Way for connection to the existing network at the Moat House/Best Western/Double Tree Hotel Roundabout (Rushey Way/Mill Lane/B3207). ETC also understands that Mill Lane would be shut to vehicle traffic, and this is currently a heavily used route. ETC anticipates that a substantial proportion of the displaced traffic would use the new road, as well as residents from the development, really increasing pressure on this very busy roundabout. Proposals for dualling the carriageway between Rushey Way and Hatch Farm Way would not make any difference to the capacity of that roundabout which will become even more congested.

In addition, flooding events that block the A327, Arborfield Road (in the vicinity of the bridge over the Loddon – as they have done in the past) and at Mill Lane/ Lower Earley Way as well as the Showcase Roundabout, would effectively lock the new residents into the Hall Farm development, as well as many residents from Lower Earley.

Incident and maintenance closures on the M4 between Junctions 10 and 11 usually result in all East and West traffic being routed along Lower Earley Way; the additional traffic from Hall Farm could generate gridlock.

1.2.3 Draft Infrastructure Delivery Plan 2021 - Roads etc.

The following bullet list is taken from the Draft Infrastructure Delivery Plan for Hall Farm/Loddon Valley dated November 2021, section 8.4.1.

On-site Infrastructure (19 items)

- Bridge over M4
- Dual carriageway road between northern internal development roundabout and Lower Earley Way
- Eastern villages access road
- Public Transport links
- Road and pedestrian bridge over River Loddon
- Hall Farm - Four Valleys Link Road
- Internal Secondary Road
- Internal link to A327 Junction
- Loddon Valley pedestrian links
- Loddon Valley central pedestrian bridge
- Loddon Valley southern pedestrian bridge
- Personal Travel Planning
- Greenways/Cycle routes
- Internal junctions
- Additional southbound lane on South Avenue
- Access on A327 via expanded Arborfield Relief Road roundabout
- Access via expanded Science Park roundabout
- New roundabout accesses on Mole Road and Mill Lane

Off-Site Infrastructure (14 items)

- Additional westbound lane on B3270 from Whitley Wood Lane to M4 Junction 11.
- Additional westbound lane on SERR between access roundabout and University Bridge
- Pedestrian / Cycle upgrades on A327 (Approx. 1,000m)
- Additional northbound lane on Lower Earley Way between Meldreth Way and Rushey Way
- Upgrade Lower Earley Way / Rushey Way / Mill Lane roundabout
- Upgrade A327 / SERR Roundabout
- Closure of Mill Lane as vehicular through route
- New roundabout on WRR for connection to Mill Lane
- Upgrade Lower Earley Way to dual carriageway between Rushey Way and Winnersh Relief Road (Approx. 400m). Includes additional bridge structures

- Upgrade A327 to dual carriageway between Arborfield Relief Road and Science Park RBT (Approx 2100m). Includes additional bridge structures
- Upgrade of Mill Lane and new road connecting to WRR
- Rapid Transport System assumed to connect Hall Farm to Winnersh Triangle Station and Thames Valley Park

In the Appendix of that document, the total costs are stated as £243 million for both on-site and off-site infrastructure – of which Transport and Access comprise the largest proportion at £140 million. This large number of mainly road developments to service Hall Farm Garden Village seems at odds with the desire to reduce vehicle traffic and encourage Active Travel.

The latest LPU mentions a new direct road, which would pass over the motorway, in order to connect the proposed housing development, between Sindlesham, Arborfield and Shinfield, with Earley.

Lower Earley Way, the River Loddon, the M4 motorway and overhead electricity cables are all closely parallel. The M4 motorway being on an embankment in the area may necessitate a bridge over the motorway that is 10 to 11 metres high, in order to give high sided vehicles sufficient clearance to pass safely underneath it. The aesthetics of such a high bridge and its approach ramps may be problematic. The cost of such a bridge would be a huge amount for which a repayable Government grant may not be available to ensure it is completed at an early phase of any development. In view of these factors and that ground conditions are, quite possibly, problematic, ETC believes the feasibility of a bridge over the M4, must be carefully reviewed.

ETC agrees that Mill Lane should be closed to through vehicle traffic and further, that it should be turned into a walking and cycling route. This route could link to New Road, Bearwood Road and Sadlers Lane to create a quiet route connecting Earley to the Wokingham Northern Distributor Road. With the newly opened Hatch Farm/Winnersh Relief Road, this should be done regardless of a development at Hall Farm. It is particularly important that the Hall Farm development has good Active Travel links through to Wokingham. The Plan, as it stands seems to promote only links to Earley and Reading.

ETC notes a recent Appeal decision regarding a large-scale development elsewhere that failed due to the lack of commitment by the developer to complete key infrastructure elements at the outset of the building works. This adds to the imperative that, if Hall Farms goes ahead, it would be essential to ensure all major road transport links are in place from the outset and not dribbled in reluctantly over the lifetime of the development.

1.3 Transport

ETC notes that Hall Farm is approximately 4.5 miles from Reading, Winnersh Triangle and Earley Stations and double that distance from Twyford station. On current evidence, bus services to feed these stations would not significantly displace individual car journeys. ETC notes that there is an aspiration for a rapid transport system to serve between Hall Farm and Winnersh Triangle Station, but ETC seriously doubt this is at all realistic. Even the nearest station at Winnersh is over 3.5 miles away and has no parking or secure bicycle storage.

The centres of Reading, Woodley and Wokingham are all approximately 5 miles away and represent the nearest substantial shopping and entertainment facilities. These are not walkable distances and

therefore any bus services would have to be very frequent, operate over extended hours and provide wide coverage to persuade people out of their cars, especially the elderly.

Various documents discuss the requirement to have “excellent transport links” to be able to supplant private motor car traffic. ETC is of the opinion they would have to be hugely extensive to achieve this. Recent examples of large developments such as Hatch Farm are not encouraging - with no dedicated bus services.

1.4 Facilities, especially healthcare and schools

Failure to provide all necessary services in a timely manner would create increased demand on already overstretched services elsewhere, including Earley.

ETC notes the allocation of a 1,500 m² space for a secondary school with associated community sports potential. ETC also notes that Oakbank and Bohunt are both at or near capacity, so a secondary school with 6th Form entry would be essential at an early stage of the development.

ETC appreciates that provision of healthcare is the responsibility of the relevant Clinical Commissioning Group, but ETC believes it would be essential to incorporate requirements within any CIL agreements for the construction of facilities for early use by the CCG. Close liaison with the NHS Berkshire West CCG, Wokingham Locality Team would be essential.

1.5 Costs

Under the Masterplan document available on the WBC website, Appendix 1, the Viability for Hall Farm is based on only 1,000 units and requires developer infrastructure investment of over £10 million. With the potential size of the development now increased to 4,500+ units, ETC assumes these costs have at least quadrupled. The viability study does not include the secondary school, which is now planned, so costs are even higher.

The Infrastructure Delivery Plan for Hall Farm/Loddon Valley states the costs of on and off-site infrastructure as being £243 million. The CIL money at current levels of around £47,000 per dwelling would probably not match this by an average short fall of £7,000 per dwelling.

ETC has significant concerns as to where the money for such a huge investment would come from and the timing of receipts. Given that Grazeley was intended to receive £253 million from Central Government for infrastructure, this viability study looks to be under-costed.

1.6 Shopping

The document shows a proposed community hub that may include a 2,500 m² supermarket space. Given its relatively small size, even if built, this would not match the attraction of Sainsburys' at Winnersh or ASDA at Lower Earley and many vehicular trips would be made to these two locations for wider choice, monthly and weekly “big” shops and probably cheaper prices. Furthermore,

experience of this sort of large-scale development tends to indicate a very late delivery of such facilities by developers. Moreover, even a small supermarket will often completely overwhelm any potential for small food shops. A great deal more thought must be given to delivery of a desirable, walkable, and viable shopping experience.

In particular, given the size of nearby developments at Arborfield and Shinfield plus Hall Farm, then ideally, a large supermarket of 6,000 m² - would be warranted with attendant complementary shop types.

1.7 Employment potential

ETC notes that much is made of local employment potential, however ETC is concerned that the Studios would have fewer than 100 permanent staff and that the majority for that employment would be large numbers of small, speciality contractors often travelling in for short periods such as 2-3 weeks. Other employment opportunity numbers are currently unknown, ETC therefore feels that the idea of large numbers of people being able to walk or cycle to work is overstated.

1.8 Future design policies specific to Hall Farm

ETC understands that policies and design codes specific to the Hall Farm Development may be subject to further consultation should the development go ahead. However, ETC considers it expedient to mention some it would hope are implemented, including:

- Mandatory requirement for renewable generation for every dwelling.
- Mandatory requirement for Active Travel facilities and assets.
- Mandatory provision of Electric Vehicle charging for every dwelling.
- Limits on dwelling density
- Minimum limits of distance from dwelling frontage to kerb.
- Street landscaping involving trees.
- Long term care and maintenance of landscaping
- Increased parking requirements on curtilage to realistically reflect modern car ownership figures
- Prevention of on-street parking
- Very early provision of key infrastructure

1.9 Principal objections and grounds of concern

ETC's principal objections to the proposal are chiefly the impacts on Earley as listed below:

- Attempting to meet Central Government's housing targets by means of one large development of 4,500 units adjacent to areas already struggling with insufficient infrastructure will exacerbate already significant problems;
- The area proposed already suffers seriously from flooding on a regular basis and in particular, where major road junctions are proposed on the Arborfield Road and at Lower Earley Way;
- ETC is seriously concerned about the contribution to flooding downstream in areas of Lower Earley and Woodley;
- The addition of 4,500 homes could easily represent something like 7,000 to 9,000 additional vehicles in the area, adding to an already heavily congested existing roads;
- The local employment potential is believed to be considerably overstated – the studios would have less than 100 full time employees. This lack of local jobs would create huge number of vehicle journeys related to employment;
- ETC consider the cost estimates to be understated and that if the full cost of the necessary infrastructure cannot be met by CIL monies, this will add to the burden on Council Taxpayers.

If WBC are minded to proceed with allocating Hall Farm for development, ETC would ask that:

- Efforts are made to ensure this is not just a carbon copy of recent large-scale developments elsewhere in Wokingham where infrastructure required to foster a community is non-existent and virtually every journey is car based;
- A limit to dwelling density is agreed that will create a true 'Garden Village' based on a proper Design Code, following consultation with Borough residents, and adhered to, thereby ensuring plenty of private gardens, open spaces and tree-lined roads;
- Much more emphasis is needed on Active Travel options;
- A true village centre is required that includes pre-school child-care facilities, healthcare and pharmacy facilities, places of worship, community space/s, shops other than just a large convenience store, other entertainment facilities, etc. and everything else that is vital to enable people to live in the village without constant off-site car journeys for shopping and entertainment etc.

1.10 Conclusion

ETC considers that Hall Farm/Loddon Valley as currently proposed is not a suitable area for the major development proposed because of the potential, massively detrimental effect on Earley residents. There are a wide range of reasons for this conclusion as discussed above, chief among them being the potential of flooding of existing properties in Lower Earley and massively increased traffic congestion in the Lower Earley and Shinfield areas.

2 Local Green Spaces for reconsideration

ETC request that areas LGS06, 21, 55 (southern part) and 57 should be reconsidered. ETC is strongly of the opinion that all four sites meet the criteria as stated in the November 2021 Topic Paper Local Green Spaces.³

2.1 Land at Laurel Park including the play area, just east of the Maiden Earley Lake Ref. LGS06

Contrary to the Topic paper recommendation, ETC knows from observations of its Park Rangers and Councillors plus comments from residents, that this area has considerable recreational value, not least because it contains a substantial play area comparable to that at Earley Events Field. The plain open green space, ref. LGS06, is often used as a picnic area. It is an important recreational area that is significantly more tranquil than the large open spaces offered by Laurel Park itself where dog owners often allow dogs to exercise and run free.

Residents in Marefield already suffer considerably when Laurel Park is used for sports events and leaving this green space available for development is only likely to exacerbate the situation. ETC are aware that WBC are considering using this area for additional parking associated with a planned Multi-Use Games Area and ETC strongly recommend that the residents in Marefield and Instow Road are specifically consulted with before any such plans are acted upon as there are mixed views on whether additional parking is desirable or not.

ETC is of the view that this area of land does satisfy the criteria for designation as a Local Green Space and would formally ask WBC to reconsider its assessment.

2.2 Harris Gardens and adjacent Wilderness on the Reading University campus Ref. No. LGS021

Contrary to the recommendation in the Topic paper, ETC is aware through observation, the very high use of the area as recreational land and this usage was very significantly increased during the various Covid lockdown restrictions. It is a year-round facility.

Criteria *a) in reasonably close proximity to the community it serves*; - Given this is surrounded by fairly dense residential areas serving both Reading and Wokingham residents, this is a highly

³ "The Local Green Space designation should only be used where the green space is:

- a) in reasonably close proximity to the community it serves;
- b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
- c) local in character and is not an extensive tract of land."

Link to various topic papers on LGS

<https://www.wokingham.gov.uk/planning-policy/planning-policy-information/reviced-growth-strategy-consultation/?categoryesct91f252ff-550d-4cfa-a838-92ef2cb5f83c=10784>

important area of recreational land and would be highly detrimental to the very nature of Earley if lost to development.

Criteria *b*) *demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife;*

ETC would also take issue with the statement in the recommendation that “*Whilst the Wilderness and Harris Gardens holds some recreational and ecological value, the area is not considered to hold sufficient value to warrant designation*”. ETC would query this statement as it is at odds with the statements made under the assessment of LGS122 where the Wilderness is specifically mentioned as being of high recreational value to the community and as a recognised Local Wildlife Site due to the richness of the wildlife.

The Wilderness area contains a significant number of veteran trees and its attendant, abundant wildlife, which must make it one of the highest value ecology areas in an otherwise dense urban area. This area is clearly an amenity and has huge recreational role to the local community.

Criteria *c*) *local in character and is not an extensive tract of land.* - The assessment that this area is “*not considered to constitute an extensive tract of land*” is considered correct and is endorsed by ETC.

Further, ETC note that the assessment of Area LGS122 which discussed the whole of the University campus, makes the following statement about the Wilderness – “*The eastern part of the site, known as ‘The Wilderness’ is classified as an area of natural and semi-natural greenspace, which is recognised as being of low quality but **high value** (our emphasis) to the local community in the Council’s Open Spaces Assessment Report (2012).*” It also states, “*The site also comprises ‘The Wilderness’, a recognised Local Wildlife Site, which was originally one of the most ornamental areas in the Marquis of Blandford’s garden*”.

ETC agrees that the whole of the University campus is not appropriate for designation as a Local Green Space, but the area of the Wilderness and Harris Gardens are very worthy of such designation.

ETC is of the view that this area of land does satisfy all the criteria for designation as a Local Green Space and would formally ask WBC to reconsider its assessment.

2.3 Lower Earley Meadows (Riverside Park) and Woodlands (A) – Ref. LGS055 - Southern Part

It is noted that the northern area is recommended for designation, however, the considerably larger southern area is not. This area is relatively low lying and floods extensively, making it difficult to understand how this can be considered for development. It provides a useful attenuation area of flood water, which if paved over, would exacerbate flooding on the northern area which contains housing currently bordering medium flood risk areas and would exacerbate run off affecting other areas downstream.

It has significant recreational value and is developing as an appreciated Local Green Space, particularly by the residents of the new, adjacent, Hatch Farm estate. Prior to the development of Hatch Farm, this area was already in recreational use by both Earley and Winnersh residents – evidenced by several established pathways including one marked on the Ordnance Survey map as a footpath from The George pub, along the northwest side of the River Loddon, under the Lower Earley Way and through to Mill Lane by the hotel. Examples of fauna include the Loddon Lily alongside the river.

It is an important Local Green Space and ETC notes that this was explicitly referred to as a Countryside Park in the S106 Agreement as part of the original planning permission. This area has been landscaped by the developers for recreational use as indicated by the number of recently constructed footpaths as well as those developed just by the passing of pedestrians. This is all clearly shown in a drawing entitled Landscape Masterplan – Country Park, produced for Persimmon and Bovis, Ref JLS2097. As this area was required to be suitably landscaped for recreation as part of the general planning permission for Hatch Farm, ETC would contend that this constitutes a sound reason for its designation as a Local Green Space.

It is local to both Lower Earley and Winnersh residents; it has demonstrable recreational value; it floods extensively and is not a large tract of land but is of local character in just the way that the northern part of this area is.

It is home to a wide variety of wildlife and whilst there are few mature and veteran trees, it is a welcome area of ecological diversity and breaks up the adjacent communities of Winnersh and Earley. As such it should be designated as Local Green Space.

ETC is of the view that this area of land does satisfy the criteria for designation as a Local Green Space and would formally ask WBC to reconsider its assessment.

2.4 Rushey Way Green Route, Lower Earley Ref. LGS057

This area provides a welcome area of green space alongside Rushey Way which is otherwise characterised in large part by high brick walls or wooden fences. It provides a significant buffer from the estate contained in Moorhen Drive and Warbler Drive. The number of established footpaths through this area attests to both its recreational value and use as a walking route connecting various parts of the Lower Earley estates.

This area was planted with upwards of a hundred English oak trees some 30 years ago. As such, ETC would contend that this constitutes a sound reason for this area to be considered as a protected green space under WBC's climate change tree planting policy

ETC is of the view that this area of land does satisfy the criteria for designation as a Local Green Space and would formally ask WBC to reconsider their recommendation.

3 Local Green Spaces related to Policy HC4 and Green Belt consideration

3.1 Land South of The River Thames Earley/Sonning LGS 009/027/029/119

ETC supports the proposed designation of Land South of the River Thames Earley/Sonning as Local Green Space. The wording of Policy HC4 is, however, considered to be too permissive and fails the NPPF test of consistency with Green Belt. Please refer to ETC comments in Section 3.3 and in respect of proposed Land South of Reading Road, Bulmershe (North), Woodley/Earley, which set out our reasoning on this matter.

3.2 Land South of Reading Road, Bulmershe (North) and (South) LGS10 and LGS11 (In the 2020 Topic Paper this area is LGS007)

WBC's proposal to accord Local Green Space (LGS) status to this important 'Breathing Space' which is embedded within and separates the communities of Woodley and Earley is fully supported by ETC. The proposed LGS, which also forms part of a Site of Urban Landscape Value, has been and remains under threat from inappropriate and/or other forms of harmful development.

WBC's January 2020 Local Plan Consultation proposed what is now the LGS10 and LGS11 land for LGS status, but as a single space. The division of this land into two LGS components (LGS10 and LGS11), within the current Draft is supported. This reflects more closely their use by the communities served by each area, the land uses that they contain, and their landscape character and setting.

However, an important omission from the current documents (main text and Topic Paper), is that the reasons upon which each LGS is founded have not been updated in order to reflect the division now proposed. ETC suggests that a separate assessment is done for each of these spaces.

3.3 Draft Policy HC4: Local Green Space

Policy HC4 is designed to regulate and manage development proposals within an LGS. In the case of Wokingham there are now proposed to be as many as 80 LGS area designations. The 'umbrella' policy governing the approach which local planning authorities are required to take with regard to LGS is set out at para 103 of the National Policy Planning Framework, July 2021 (NPPF). This requires that, '*Policies for managing development within a Local Green Space should be consistent with those for Green Belts.*'

By contrast, ETC notes that the Consultation Document imports a subtle shift of focus where it is stated, at para 7.2, '*... policies for managing development would be broadly consistent with those for the Green Belt.*' In ETC's view there are no local circumstances that would justify the Council departing from NPPF guidance which is clear and unambiguous and reflects the high level of constraint, which has underpinned policy for Green Belt for decades.

This departure is reflected in the wording of proposed Policy HC4 which devolves testing of individual proposals for their compliance or otherwise against 'differing' considerations, which are to be found within the site specific 'reasons for designation' of each of the 80 LGS areas. The approach, in our view is not consistent with Green Belt policy which has equal applicability to all Green Belt sites. Moreover, it is not clear as to where in the Plan, the relevant 'reasons' will be set out. If it is to be the analysis set out in the Topic Paper, this will be accorded only limited weight in decision-making at appeal, albeit a material planning consideration.

Turning to a point of detail the draft policy appears to provide open-ended support for all proposals which '*...improve accessibility to or enhance the use of Local Green Space.*' (sub-para 4, un-numbered). ETC can find no support in the NPPF for such permissive approach under Green Belt policy. With regard to 'accessibility' NPPF para 150 e) *requires, for local transport infrastructure, that proposals must demonstrate a requirement for a Green Belt location.* In addition, the term '*enhance the use*' is ambiguous and capable of multiple interpretations. Does it mean intensification of use and if so in what form? Would this mean new buildings; all-weather sports facilities/floodlights; children's play areas and if so, on what scale and in which of the 80 LGS? This is a matter for testing against policy, which itself must be consistent with Green Belt.

ETC have considered all the above points carefully and conclude that the policy would be both strengthened and consistent if it were tied more closely to the NPPF Green Belt text. ETC suggest the following wording:

'The Council has identified and will protect from inappropriate development all Local Green Spaces shown on the policy maps. Development proposals within a Local Green Space will be assessed against national Green Belt policy.'

This concludes the comments of Earley Town Council.

Dated: 21st January 2022