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Planning Department
Wokingham Borough Council

20th March 2023

Dear Sir/Madam

Ref: Planning Application 230422 - 81 homes on Land West of Trowes Lane and North of Charlton Lane Swallowfield

Swallowfield Parish Council **STRONGLY OBJECTS** to the Croudace Homes planning application (WBC ref 230422) and asks that it be refused on the grounds that:

1. It represents an inappropriate site for development and a fundamental misunderstanding of the village by the applicant.
2. It runs contrary to several key WBC Core Policies and Climate Emergency Plans.
3. It fails to recognise the absence of critical infrastructure.
4. It will result in a huge increase in vehicle movements within the village and linked commuter routes.
5. It will have a massive negative impact on residents of the whole parish.
6. It is strongly opposed by the vast majority of Swallowfield residents as demonstrated by the objections lodged to date.

In the following paragraphs, where appropriate, the relevant numbers from the current application for 81 homes (230422) and an earlier application by Cove Homes for 20 homes (162498) (approved on appeal but not yet constructed) have been conflated. Collectively the two sites represent 101 homes and >200 additional motor vehicles. It is appropriate to consider their combined impact on the local infrastructure.

Inappropriate Development

1. Whilst the Parish Council recognises the need for additional housing in the Borough, Swallowfield village has already had more than its share of new housing within the settlement envelope. Furthermore, this site is outside the development limits as identified in the Managing Development Delivery Local Plan (MDDLDP) policy CC02 - Development Limits. The site is therefore on land designated as open countryside and the proposed development would be contrary to Core Strategy policy CP11 - Proposals outside Development Limits (including countryside).
2. The applicant suggests that the site (5SW019) has been proposed in the Local Plan Update (LPU). This is incorrect. Whilst it was one of many sites that were the subject of a consultation, the outcome of that consultation is as yet unknown. Thus, it remains just one of many sites still being assessed and most certainly is not allocated for inclusion in the Local Plan. Indeed, a draft update of the Local Plan has yet to emerge.



3. The proposed housing density would far exceed that of the rest of the settlement including the adjoining developments in Foxborough. WBC's Housing and Economic Land Availability Assessment (HELAA) report suggested a maximum of 63 properties for site 5SW019, not the 81 proposed. But that does not mean that the site is suitable for development in other respects and indeed it is not.
4. The Core Strategy policy CP9 - Scale and Location of Development proposals - designate Swallowfield as a 'limited development location', which is the lowest tier of identified settlements. Para 2.87 of the Core Strategy states "Overall, due to the limited range of facilities, it is not considered that significant development is appropriate in these locations" and policy CP9 states that development should be confined to within the settlement boundary. The proposed development is clearly outside the settlement boundary whilst, as indicated in more detail below, the applicant has materially overstated the available infrastructure.
5. Construction of the currently proposed 81 homes and the previously consented (but not yet constructed) 20 homes on a separate site, which is also accessed via Trowes Lane (a narrow country lane), will result in a circa 40% increase in the number of properties in the settlement as a whole and a substantially higher percentage of the total number of residents (which was less than 670 on the 2021 census). This would have a very significant adverse impact and constitutes inappropriate development.
6. The assessment tabled in the Core Strategy Appendix 3 (April 2008) recognised that Swallowfield had "very limited facilities". The situation in March 2023 remains unchanged.
7. Approval of this application would set an undesirable precedent for further exploitation of the countryside and would turn Swallowfield from a rural village, with its own unique character, into a materially larger urbanised settlement.
8. The proposed development represents a largely self-contained 'balloon' development with one vehicular access onto a narrow country lane and little connection (or motivation to connect) to the rest of the village other than as a conduit for travel elsewhere.
9. The proposed new homes will result in an estimated 300-400 new residents and 200+ motor vehicles, with potentially more in later years as recently observed in Foxborough. This will place an unacceptable strain on the limited resources of the village (see details below) and the local road infrastructure.
10. The proposed housing density for the site is some 50% higher than that in the settlement as a whole and especially in the adjacent development (Foxborough) off Trowes Lane. This would not recognise the need for a soft, gentle transition to countryside on the outskirts of the settlement as required by the MDDL policy CC02 - Development Limits.
11. While this agricultural land is designated classification 3A or 4, site 5SW019 has, until the recent demise of Valley Produce, been a productive site for herbs and cereal crops over many years. At a time when the nation needs more, not less, domestic food production, removing its agricultural status is wrong.

12. In considering applications for the adjoining site (5SW007), the planners commented:

“The proposed development would be contrary to policies CP9 & CP11 of the adopted development plan” thereby impacting the separate identity of Swallowfield and causing harm to the quality of the environment.

Approval of the current application would amplify the significance of this statement by a factor of 5 and result in an irrevocable change to the character of this community. Accordingly, these policies should be accorded greater weight.

13. The proposed development falls substantially short of meeting the criteria for sustainable development set out in Core Strategy policy CP1. Travel by private car will be essential for access to most facilities and services and run counter to the council’s Climate Emergency Plans. Please see further details below.
14. The site provides an important resource for local wildlife with scope for enhancement. Multiple species, not just those highlighted in the developer’s Ecology Statement, use the site for hunting and foraging on a regular basis or to transit between areas of refuge adjacent to the site. The proposed development would permanently remove this wildlife “oasis” and corridor on the outskirts of the village. Please see further details below.

Lack of Critical Infrastructure

1. **Transport** - the local bus route does not meet WBC Core Strategy guidelines for ‘good public transport’. The existing basic ‘600’ route offers a limited north/south service between Reading and Riseley. There is no onward service to Fleet and no prospect of this being revived. The service is limited with no service on Sundays. It is unlikely to satisfy the bulk of travel to work, school or leisure facilities. There are no east/west services in existence, or in prospect, that could provide travel to schools that include Swallowfield in their catchment area, or to Wokingham town. The service has an insecure future which cannot be funded at current levels beyond August 2023 and further cut-backs are inevitable. Suggested, but time limited, funding support from the developer will make little difference in the longer term (as has been demonstrated by the bus services at the Shinfield Meadows development).
2. **Healthcare** - Swallowfield Medical Practice is already oversubscribed because of earlier increases in housing within its catchment area which includes the South of M4 SDL. The nearest dentist is in Shinfield, some 8km away and, due to massive local development in Shinfield, is unlikely to have any availability.
3. **Schools** - there is no local primary school and no secondary school within 3-4 km of the development with the exception of Lambs Lane Primary School and Swallowfield is outside its catchment area. The school is already fully subscribed from its local catchment area around Spencers Wood. The nearest available primary and secondary schools for Swallowfield residents are in Arborfield Green or Three Mile Cross/Shinfield Meadows, all of which would require a car journey significantly in excess of the target distance of 4km. Contrary to WBC Core Policy, there are no safe cycle or pedestrian routes from Swallowfield available, or possible, to any of these schools.

4. **Groceries** - the local shop is small, has limited stock and no prospect of expansion within the settlement. The nearest supermarkets are at least 5km away requiring a round trip car journey of 10km.
5. **Flooding and Waste Water** – the applicant’s Flood Risk Assessment (FRA) is flawed in a number of key respects. The sewerage pumping station in Swallowfield is already at breaking point and overflows and flooding in heavy rain are a common occurrence in much of the settlement due to surface water surcharging of the foul water system. WBC’s assessment recognises that over half the site has the potential for groundwater flooding, with a generally low, but up to HIGH, risk. The FRA fails to take into account of the potential for off-site flooding along the roads surrounding the site. For details, please see the report from the Swallowfield Flood Resilience Group which, for completeness, has been reproduced in Appendix B of this document.
6. **Electricity** - based on the pattern of new estates nearby, there will be an increasing demand for EV charging points and on network capacity to serve them. Reports of ‘brown outs’ due to excessive demand have been widely reported in Shinfield.
7. **Roads & Pavements** - most of the roads in and around the settlement are narrow, especially Trowes Lane (the only exit from the proposed development) and in particular the Conservation Area of The Street. Very narrow pavements in the Conservation Area connect key resources of the settlement for current residents. They cannot be widened and are perilous for pedestrians, especially children, users of pushchairs and wheelchairs and older residents, many with vision, hearing or mobility impairments. The proposed improvements to Trowes Lane are inadequate and insufficient.

Traffic and Climate Change

1. Based on the pattern of similar developments in nearby Shinfield Parish and Heckfield Parish, the proposed homes will be largely occupied by young professional families, with one or more children.
2. Due to the lack of local or nearby infrastructure (see above), a journey of 5 km or more will be needed to reach schools, places of work, grocery shopping, libraries, entertainment or general retail. Few of these destinations can be reached using public transport. None can be reached safely by cycle or on foot contrary to Core Strategy policy CP6 - Managing Travel Demand. A car will be required for virtually every journey. This will lead to increased noise, pollution (greenhouse gas emissions) and traffic congestion.
3. The applicant’s proposals for additional cycle routes and footpaths are not feasible outside of the development itself. Most local roads outside the settlement are unsafe for cyclists, especially children, many lack pavements and most of those that do exist are in a poor or very poor condition.
4. The current public transport (bus) service, even if continued, will not meet the needs for the majority of journeys to schools, or places of work, and there is no prospect of new services that would.

5. Based on the foregoing, an estimated 200+ increase in vehicles will lead to an estimated additional 800+ vehicle movements per day. Most will need to travel along Trowes Lane and The Street to reach destinations outside the settlement, contributing to climate change and noise and raising safety concerns on both roads. Nearby Charlton Lane, which is single track, would also suffer an unacceptable increase in traffic.
6. A traffic survey conducted by the Parish Council using advanced technology has profiled existing traffic in Trowes Lane, 24x7, over multiple days. A similar survey has been conducted at the entrance/exit of the Duke's Field estate (83 homes) in Riseley, a community with a similar profile to that anticipated by the proposed development. The results suggest a fourfold increase in vehicle movements in Trowes Lane at peak times from ~ 40/hour to >160/hour. This would be unacceptable to the residents of Trowes Lane and the village as a whole. Given WBC's core policy of reducing motor vehicle usage, approval of this application will produce the directly opposite result. Please see Appendix A of this document for further details.

Ecological Impact

The site is frequented by a significant variety of important birds and mammals that use the site itself for hunting and foraging, or whilst in transit between refuges in the woodland on the southeast corner and the spinney with a significant pond abutting its north west corner. These observations are supported by the applicant's own survey which states:

1. **Bats**

Para 4.31 "The presence of barbastelle at the Site is significant due to their elevated conservation status ...", and

Para 4.39 "... the populations of bats utilising the Site are considered to be collectively important at the Local level."

2. **Birds of Prey**

Para 4.43 notes the presence of Barn Owls in the vicinity and Red Kites over the site which hunt in open fields. The Parish Council has first-hand knowledge of Barn Owls, Kestrels and Buzzards seen hunting in these fields.

3. **Great Crested Newts**

Para 4.53 notes "There are areas of suitable great-crested newt terrestrial habitat within the site..." and they have been shown to be present in the general vicinity in 2 ponds (including the pond in the aforementioned spinney on the northwest boundary of the site).

The site provides an important resource for a host of local wildlife, not just protected species, and there is scope for habitat enhancement. Mitigation measures proposed by the applicant are limited in scope and cannot adequately protect local wildlife populations. Building houses here would permanently destroy this important wildlife oasis and corridor on the outskirts of the settlement.

Other Considerations

1. **Community Involvement:** The developer's attempt to garner support from the community via a questionnaire and a website was ignored by most residents because the questionnaire was clearly biased to produce results which would favour their objectives. Of the mere 14 responses they received, most were strongly opposed.
2. **Cohesion with the village:** There would be little motivation for new residents to engage with the village, rather the village will simply serve as a vehicle conduit to the wider world, as has proved to be the case with the Pippins development to the northwest of the village.
3. **Traffic Modelling by Bellamy Roberts:** The consultants' measurements of current traffic flows in Trowes Lane are broadly consistent with the Parish Council's observations but predicted flows post construction are not shown. Despite the apparent use of Wokingham Highways Traffic Model, the Parish Council believes their conclusions to be flawed because:
 - a. They grossly overstate the extent to which public transport (the '600' bus service) is a viable option for commuting to school, travel to work, food shopping, etc. Identified schools are in locations not available to residents of Swallowfield or accessible via the '600' bus service.
 - b. They fail to acknowledge the very different demographics of the new arrivals versus the current residents of Foxborough (largely older, often retired, less likely to travel at peak hours).
 - c. They ignore the imminent development of the adjacent site (application no. 222769).
Their conclusion that "there are genuine opportunities for residents to travel to/from the site using sustainable modes of transport" is deeply flawed.
The Parish Council also considers that alterations to the footpath and overhanging vegetation on the western side of Trowes Lane will not significantly improve the safety of this very narrow lane. At some points, two full size vehicles can only pass with the greatest of care. In view of the predicted increase in traffic volumes, this represents a serious safety risk.
4. **Modifications to The Street:** Bellamy Roberts' suggestion of island pedestrian crossings, increased street lighting and bus shelters would adversely and materially impact not only the Conservation Area of The Street but the rural character of the entire settlement and are likely to be strongly opposed by current residents. Road widths would not support island crossings.
5. **Loss of Good Agricultural Land:** The conclusions of Reading Agricultural Consultants are at odds with the recent history of the site and the country's need to grow more of its own food.
6. **HELAA Report on Site 5SW019:** The assessment confirms many of the assertions made in this document in support of the Parish Council's strong opposition to this planning application.

Finally, should this application be approved (with or without consideration of the above noted comments), we request that a condition be applied to require the foul and surface water drainage system to be completed and operational before construction of any housing or hardstanding areas are commenced. This condition would mitigate the risk of surface water flooding from the site during construction.

With thanks to Graham Stanley, Chair, Swallowfield Flood Resilience Group



Yours Faithfully

Mrs. E. A. Halson

Clerk, Swallowfield Parish Council

Attached:

Appendix A – Current and projected Traffic Levels in Trowes Lane

Appendix B - Swallowfield Flood Resilience Group Report

Appendices

Appendix A

Current and Projected Traffic Levels in Trowes Lane

Swallowfield Parish Council has acquired the Black Cat Traffic Radar system from TagMaster UK (<https://uk.tagmaster.com/products/traffic-radar-blackcat/>) in order to conduct its own monitoring of traffic flows at locations around the parish. The Black Cat is a proven system, widely used by local authorities and police forces around the world.

The Black Cat has been used to measure and profile current traffic flows in Trowes Lane and at the sole exit from the Duke's Field development in Riseley. The latter has been chosen to model the likely pattern of traffic flows in/out of the proposed development by Croudace Homes. Duke's Field was chosen because it has:

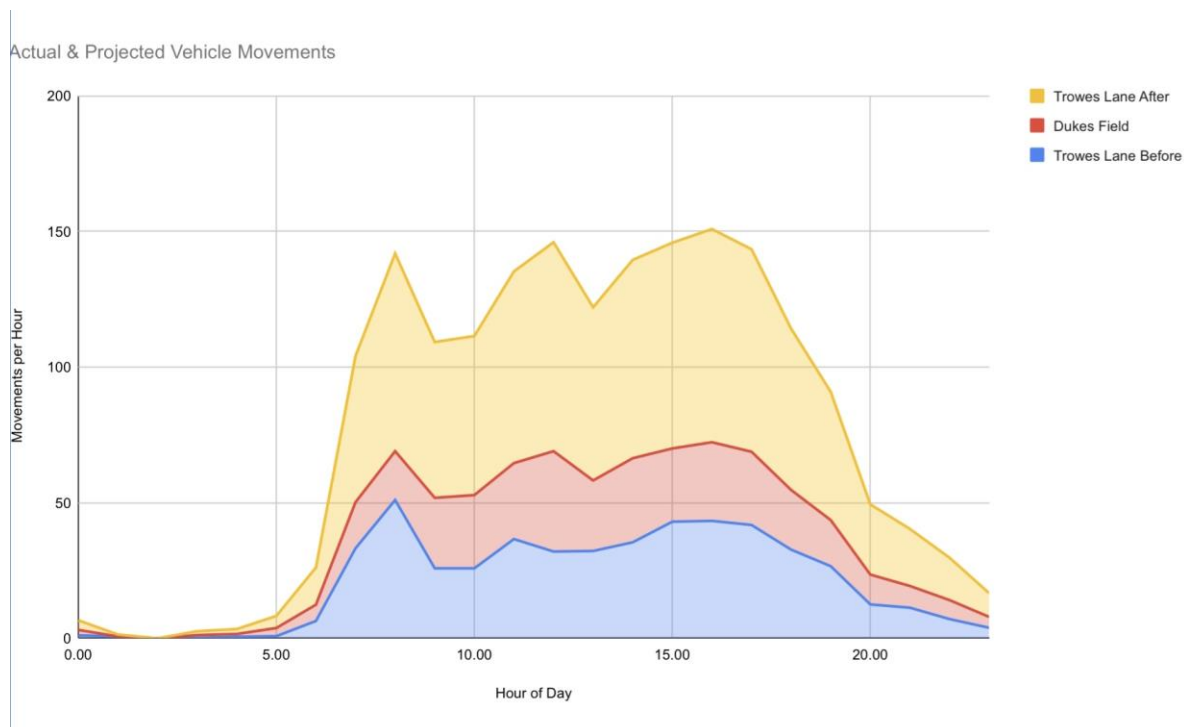
- a. a similar number of homes (83) as those in this application (81);
- b. a demographic profile likely to be similar to that of the proposed development by Croudace Homes and the previously approved development by Cove Homes;
- c. a similar shortage (as in Swallowfield) of local resources and public transport thereby requiring a similar level of motor vehicle usage.

Measurements of actual vehicle movements taken in Trowes Lane between 13th Feb and 19th Feb, and in St Legers Way between 9th March and 18th March 2023. The following table provides a disturbing projection of the likely increase in vehicle movements in Trowes Lane post construction of the two new developments.

Time Interval	Trowes Lane 5 Day Average	St Legers Way 5 Day Average	St Legers Way Adjusted * 5 Day Average	Projected Trowes Lane 5 Day Average	Projected Increase in Vehicle Movements
12H (7-19)	338	433	527	587	293%
16H (6-22)	364	490	596	738	264%
18H (6-24)	370	501	610	806	265%
24H (0-24)	375	504	613	987	263%

* The 'adjusted' numbers reflect the difference in housing numbers between the Duke's Field estate (83 homes) and the proposed Croudace Homes and Cove Homes developments (collectively 101 properties).

The following graph shows actual and projected hourly vehicle movements in Trowes Lane during the course of the day. Projected movements (in yellow) would apply post construction and occupation of the proposed Croudace Homes and Cove Homes developments.



Swallowfield Parish Council maintains that earlier calculations by Wokingham Highways Department re the ability of Trowes Lane to support this additional traffic have not adequately considered:

- a. the different demographic between present and projected users of Trowes Lane;
- b. the lack of local infrastructure and resources and its implications for vehicle usage;
- c. the increasing numbers of residents returning to work in the office;
- d. the future increase (as experienced in Foxborough) of driving age children;
- e. the profile of the full length of Trowes Lane (within the village), its narrowness and the number of driveways exiting onto it;
- f. the safety implications for both vehicular and pedestrian traffic.

In conclusion, the Parish Council submits that this level of traffic in Trowes Lane is **unsafe, unmanageable and unsustainable**. Mitigation measures suggested by the applicant (improvements to sight lines and pavements) are totally inadequate and more substantial measures are impractical. The Parish Council would welcome an onsite visit by WBC planners to review the issues raised.

Appendix B

Swallowfield Flood Resilience Group Report

Written on behalf of Swallowfield Flood Resilience Group whose members have considered this planning application and wish to make the following comments:

A flood risk assessment and SuDS strategy (FRA) document has been included in the developer's submission, but no specific details of foul or surface water drainage proposals are provided, although a drawing in Appendix F is noted as 'to follow'.

Paragraph 10.1.3 of the FRA concludes that future occupants and users of the proposed development will be safe from flooding. This may well be the case if the measures described in the FRA are implemented and people are not trying to get into or out of the development during a serious storm. No account seems to have been taken of the flood mapping and historical experience of surface water flooding in Swallowfield, where Charlton Lane and Trowes Lane act as a main conduit for overland flows between Riseley and the Blackwater River. During storm conditions, any residents and visitors trying to enter or leave the development are likely to be at serious risk from this flooding.

We note that in Appendix D of the FRA, Thames Water state that they have no records of incidents of flooding in the requested area as a result of surcharging sewers. The requested area is RG7 1RJ, which covers 20 existing properties on Trowes Lane. There have, however, been numerous instances of surcharging to the foul sewer system in other areas of Riseley and Swallowfield following periods of heavy rainfall, particularly lower in the catchment. Many if not most of these incidents were reported to Thames Water. The most recent instances were in December 2022, when Thames Water were called out to pump out sewers in The Naylors and Foxborough; and in January 2023, including overflow of foul sewage from a manhole at the junction of Part Lane and Church Road in Swallowfield, which was reported to Thames Water by one of our members.

The foul sewage system in Swallowfield and Riseley suffers from excessive surface water ingress during heavy rainfall and the pumping station on Swallowfield Street and the associated rising mains often cannot cope with the volumes of storm water received. SFRG and residents are concerned that the connection of yet more housing to the foul sewer system, without addressing these serious issues, would be unacceptable.