

**Q6 Spatial strategy (how we plan for development)**

Q6a Do you want to comment on the proposed changes to the spatial strategy?

Yes

Q6b To what extent do you agree with the proposed changes to the spatial strategy policy?  
The primary focus of new growth through the identification of a new Strategic Development Location at Hall Farm / Loddon Valley

3

The identification of additional growth within and adjacent to existing Strategic Development Locations when consistent with their original vision

1

The identification of modest development across the borough, consistent with the character and accessibility of places

1

The extension of the plan period to 2018/19-2037/38, and an associated update to the development needs

1

Q6c Please set out your comments, including your reasons for agreeing or disagreeing with the proposed changes. If you would like to suggest any changes, please explain the change you would like to see.

*No comment*

**Q7 Arborfield Strategic Development Location**

Q7a Do you want to comment on the proposed changes to the Arborfield Strategic Development Location?

Yes

Q7b Arborfield Strategic Development Location

The following questions ask to what extent do you agree with the proposed changes to the Arborfield SDL policy?

1

Q7c Comments

*Agree – all sensible. We noted the proposal to add 10 houses on the site of Westward Cottage on Sheerlands Road and to include the planned development Reading football training ground into the SDL. The former is wholly positive. It is an HGV park – lorries travelling down Sheerlands mixing with new residents' traffic is difficult, it is also a noisy and site accessed until late in the evening which is disturbing for residents.*

Q7d. Development guidelines for Arborfield SDL

*No Comment*

**Q8 South of the M4 Strategic Development Location**

Q8a Do you want to comment on the proposed changes to the South of the M4 Strategic Development Location.

No

**Q9 North Wokingham Strategic Development Location**

Q9a Do you want to comment on the proposed changes to the North Wokingham Strategic Development Location?

No

**Q10 South Wokingham Strategic Development Location**

Do you want to comment on the proposed changes to the South Wokingham Strategic Development Location?

*No comment*

**Q11 Hall Farm / Loddon Valley Strategic Development Location**

Q11a Do you want to comment on the proposed allocation of Hall Farm / Loddon Valley as a Strategic Development Location?

*Yes*

Q11b To what extent do you agree with the proposed allocation of Hall Farm / Loddon Valley as a new SDL?

*3*

Q11c Please set out your comments, including your reasons for agreeing or disagreeing with the proposed allocation. If you would like to suggest any changes, please explain the change you would like to see.

*In our opinion, SDLs are by far the best way of delivering housing for communities including the infrastructure they require. The location of a new SDL is always going to be contentious, and we recognise the challenge in finding the best, or perhaps least-worst site. The argument for Halls Farm location is strong, with its closeness to new relief roads, proximity to a local employment centre and opportunity for new services - notably with some elements of the Royal Berks perhaps relocating. However, we are concerned that the site is on a flood plain and the Loddon Valley is an important wildlife corridor which must be maintained and needs to be more than just a small number of wildlife tunnels under local roads. Minimising the environmental cost of the development will be an imperative.*

**Q12 Changes to sites proposed in the Draft Local Plan (2020)**

Q12a Do you want to comment on the changes to sites proposed for allocation in the Draft Local Plan (February 2020)?

*Yes*

Q12b To what extent do you agree with the proposed changes in the indicative capacity for sites identified in the Draft Local Plan (2020) for residential / mixed use development?

Land east of Park View Drive North, Charvil

Land west of Park Lane, Charvil

Land to the rear of 9-17 Northbury Lane, Ruscombe

Land between 39-53 New Road, Ruscombe

Land at Bridge Farm, Twyford

Winnersh Plant Hire, Reading Road, Winnersh

Winnersh Farms, Winnersh

Station Industrial Estate, Oxford Road, Wokingham

54-58 Reading Road, Wokingham

*All 3*

Q12c Please set out your comments on the proposed changes in the indicative capacity. If you would like to propose an amendment, please explain the change you would like to see and why.

*No Comment*

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**Q13 New sites proposed for residential / mixed development**

Q13a Do you want to comment on the new sites proposed for residential / mixed use development?

Yes

Q13b To what extent do you agree with the new proposed allocations of land for residential / mixed use development?

Rooks Nest Farm and 24 Barkham Ride, Finchampstead

31-33 Barkham Ride, Finchampstead

Greenacres Farm, Nine Mile Ride, Finchampstead

Land north of London Road and East of A329(M)

Land east of Pound Lane, Sonning (Sonning Golf Club)

**Land west of Trowes Lane, Swallowfield**

Land to the rear of Bulldog Garage, Reading Road, Wokingham

69 King Street Lane, Winnersh

Land to the rear of Toutley Hall, north west of Old Forest Road, Winnersh

Former M&S, 26-36 Peach Street, Wokingham

Wokingham Library, Denmark Street, Wokingham

Suffolk Lodge, Rectory Road, Wokingham

Land at the corner of Wellington Road and Station Road (accessed via Park Road), Wokingham

Millars Business Park, Molly Millars Lane, Wokingham

Bridge Retail Park, Finchampstead Road, Wokingham

Land to the rear of Sandford Pumping Station, Mohawk Way, Woodley

*5 (Highlighted site)*

Q13c Please set out your comments on the new proposed allocations. If you would like to propose an amendment, please explain the change you would like to see and why.

We strongly disagree with the inclusion of land west of Trowes Lane, Swallowfield 5SW019. This site when previously assessed in LPU 2020 Appendix B part 5: "The site, whilst partly adjacent to Swallowfield, fails to achieve a satisfactory relationship with the existing settlement, forming an illogical protrusion away from the main built-up area. Development of this site would result in the loss of some best and most versatile grade 2 agricultural land – with the remainder being grade 3. The site is considered to be less sustainable, with limited access to services and facilities. The scale of development would not allow for improvements to infrastructure and services. The site is not considered to be suitable for development."

The assessment went on to say: "Not developable within the next 15 years. The site, whilst partly adjacent to Swallowfield, fails to achieve a satisfactory relationship with the existing settlement, forming an illogical protrusion away from the main built-up area"

Nothing has changed since this assessment was performed. The site isn't a natural extension of Swallowfield. There is poor access to services with no local school and only a small local shop and post office. Access to the site is poor via Trowes Lane which cannot be upgraded without significant impact on existing housing and in the case of Charlton Lane, there would be loss of rural character and the difficult entry/exit from the lane makes this approach unviable. These are narrow lanes with clear rural character. Of particular note is that there are inadequate footpaths along Trowes Lane to the village and not enough space to adequately improve them.

There is a reliance on improving connectivity between the site and the village by creating a new pedestrian link through the development of 20 houses on land to the west of Trowes Lane. Reserved matters consent has now been granted for this development and the layout has been approved. As such a Section 73 application would be required to make any layout changes which would have time and cost

implications. There is no mechanism to secure this permission is amended and it would be unreasonable to do so.

Para 104 of the NPPF states that 'transport issues should be considered from the earliest stages of plan making....' It is essential before the site is allocated that there is evidence to show that safe access arrangements can be achieved AND that the engineering works required to do this do not result in a harmful landscape and visual impact. There is no such evidence to demonstrate this and given the characteristics of both lanes it is a strong concern that they could not accommodate this number of houses without adverse harm.

The site as noted as prone to flooding. Swallowfield still has major flooding issues from water runoff from higher land at Riseley which further development would exacerbate.

Swallowfield is identified as a limited development location for good reason. Public transport links from Swallowfield are virtually non-existent now that the most important No.7 bus which provided regular links to Reading town centre and Hartley Wintney has been cancelled; a development of this size would not support its improvement. The net result is that for most services the new residents would be forced to reach for their car keys.

The HELAA references the adjacent site that has planning permission for 20 houses on the Land West of Trowes Lane (162498.) This application has had a difficult history – having been approved on appeal on a technical housing supply matter. Wokingham had previously rejected this application noting it would:

- Have substantial urbanising effect on the countryside
- Fail to protect the identity of settlements
- Introduce build form into the countryside
- It would degrade the character of the countryside, harming the condition, character and features of the surrounding countryside. It would also cause loss of visual amenity

These were strong arguments against that application – and they still hold true for 5SW019. 5SW019 proposes to build on this unfortunate appeal decision – which would compound the issues highlighted above.

The original 2019 HELAA assessment was careful and objective. It also proposed the site had 63 dwellings. The latest update appears more subjective and the conclusions rushed. Even so, we also note the following red flags in the 2021 LPU HELAA assessment – all of which point to this being an unviable site:

- Access is unsuitable: 'site is beyond reasonable walking distance from defined centre'
- The site is 'Greenfield'
- Flood risk: 'Flood risks: surface water – YES, low to high risk, Groundwater – over 50% of the site has potential for groundwater flooding to occur at the surface'
- The site would lose the area valuable farming land: 'Loss of best and most versatile agricultural land – YES'
- There would be loss of hedges and trees: 'Loss of green infrastructure – MAYBE'
- There are inadequate services and facilities: 'few services available within 20 mins walk' Lambs Lane school 'accessed by a private vehicle' – and also true for 'secondary schools in Arborfield and Shinfield'. Please also note that although Lambs Lane Primary School is the closest school, it is not one of Swallowfield's catchment primary schools and isn't an option for primary education for local residents. Farley Hill, which is a catchment school has now moved from Farley Hill to Arborfield and is further from the village.
- The access, either by vehicle or on foot is inadequate: 'narrow unlit road with no footpaths'

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- Public transport provision is poor, and, as stated in HELAA on active travel: bus services are 'infrequent and not providing a level of service considered to be good' and access to the village only possible 'through the committed site' although there is no easy mechanism for this in the approved design
- Further, HELAA notes, more widely that the Acceptable level of Accessibility and Connectivity – 'NO'

All of the above leads inexorably to the conclusion this is not a suitable site – as was determined in the previous LPU 2019 draft.

We are also very concerned that this would start to an incremental set of planning applications for adjacent sites including 5SW005 between Trowes and Oakleigh Farm, all of which would suffer from the same issues above, further exacerbating them.

**Q14 Development guidelines for residential / mixed development**

Q14a Do you want to comment on the development guidelines for the proposed allocations for residential / mixed use development?

Yes

Q14b To what extent do you agree with the new proposed allocation of land for residential / mixed use development?

Land north of The Shires, Barkham  
Woodlands Farm, Wood Lane, Barkham  
Land East of Park View Drive North, Charvil  
Land West of Park Lane, Charvil  
Jovike, Lower Wokingham Road, Finchampstead  
Tintagel Farm, Sandhurst Road, Finchampstead  
Land to the rear of 166 Nine Mile Ride, Finchampstead  
Land adjacent to Whistley Green Cottage, Whistley Green, Hurst  
Land north-west of Hogmoor Lane, Hurst  
Land to the rear of 9-17 Northbury Lane, Ruscombe  
Land between 39-53 New Road, Ruscombe  
Rustlings, The Spring and Land to rear of Cushendall, Shinfield Road, Shinfield  
Land at Sonning Farm, Sonning  
Land at Bridge Farm, Twyford  
Winnersh Plant Hire, Reading Road, Winnersh  
Winnersh Farms, Winnersh  
Land on north-west Side of Old Forest Road, Winnersh  
Land off Wheatsheaf Close, Sindlesham  
Station Industrial Estate, Oxford Road, Wokingham  
54-58 Reading Road, Wokingham  
Rooks Nest Farm and 24 Barkham Ride, Finchampstead  
31-33 Barkham Ride, Finchampstead  
Greenacres Farm, Nine Mile Ride, Finchampstead  
Land north of London Road and East of A329(M)  
Land east of Pound Lane, Sonning (Sonning Golf Club)  
**Land west of Trowes Lane, Swallowfield**  
Land to the rear of Bulldog Garage, Reading Road, Wokingham  
69 King Street Lane, Winnersh  
Land to the rear of Toutley Hall, north west of Old Forest Road, Winnersh  
Former M&S, 26-36 Peach Street, Wokingham  
Wokingham Library, Denmark Street, Wokingham  
Suffolk Lodge, Rectory Road, Wokingham  
Land at the corner of Wellington Road and Station Road (accessed via Park Road), Wokingham

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Millars Business Park, Molly Millars Lane, Wokingham  
Bridge Retail Park, Finchampstead Road, Wokingham  
Land to the rear of Sandford Pumping Station, Mohawk Way, Woodley

**5 (Highlighted site)**

Q14c Please set out your comments on the development guidelines. If you would like to propose an amendment, please explain the change you would like to see and why.

As commented in Q13, this site is not suitable for a wide range of reasons already drawn out.

The questions that must be answered are:

- Suitability and safety of vehicle access to the site via Trowes Lane and Charlton Lane
- How pedestrian access to the site would be made safe with the inadequate paths in the current proposal
- How the flood risk both on site and more widely in Swallowfield would be mitigated
- How sufficient infrastructure would be delivered to make the site viable. This would need to include: access to schools and adequate public transport
- How local employment opportunities would be provided to stop this site just being a commuter residence
- How to integrate the site into the village, so it is not just an isolated residential balloon development
- How the loss of good farming land is justified when there are other, more suitable and less agriculturally valuable, sites

**Q15 Pinewood Centre**

Do you want to comment on the identification of Pinewood for self-funded regeneration?

No

**Q16 Local Green Space**

Q16a. Do you want to comment on the new proposed allocations of land as Local Green Space?

Yes

Q16b. To what extent do you agree with the new proposed allocation of land as Local Green Space - Arborfield and Barkham

Arborfield Park, Swallowfield Road, Arborfield  
Pound Copse, Greensward Lane, Arborfield  
The cricket and rugby pitches within the Arborfield Garrison SDL (A), Princess Marina Drive, Arborfield / Barkham  
The cricket and rugby pitches within the Arborfield Garrison SDL (B), Princess Marina Drive, Arborfield / Barkham  
Rook's Nest Wood Country Park, Barkham Ride, Barkham  
Hazebrouck Meadows (A), Biggs Lane and Commonfield Lane, Barkham  
Hazebrouck Meadows (B), Biggs Lane and Commonfield Lane, Barkham  
Elizabeth Park, The Junipers, Barkham  
The Junipers, Barkham

3

Q16c To what extent do you agree with the new proposed allocation of land as Local Green Space - Earley and Sonning

Chalfont Woods and Chalfont Park, south of Chalfont Way, Earley  
Events Field, Kilnsea Drive, Earley  
Laurel Park, Marefield, Earley  
Loddon Fields, Lower Earley Way, Earley

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Sol Joel Park, Church Road, Earley  
Land south of the River Thames, Earley / Sonning  
Maiden Erlegh Lake and Local Nature Reserve, Maiden Erlegh Park, Earley  
Meadow Park, Meadow Road, Earley  
Redhatch Copse, Redhatch Drive, Earley  
Thames Water Reservoir (Hillside), Elm Lane, Earley  
Lower Earley Meadows (Riverside Park) and Woodlands (A), Wokingham Road  
and Danehill, Earley  
Lower Earley Meadows (Riverside Park) and Woodlands (B), Wokingham Road  
and Danehill, Earley

3

Q16d To what extent do you agree with the new proposed allocation of land as Local Green Space - Finchampstead

Warren Wood Country Park, Warren Lane, Finchampstead  
Burnmoor Meadow, Longwater Road, Finchampstead  
California Country Park and Longmoor Bog, Nine Mile Ride, Finchampstead  
Shepperlands Farm, Park Lane, Finchampstead  
Finchampstead Memorial Park, The Village, Finchampstead  
FBC / Gorse Ride playing fields, Gorse Ride North, Finchampstead  
Woodmoor Play Area, Woodmoor, Finchampstead  
The Moors, Waverley Way, Finchampstead

3

Q16e To what extent do you agree with the new proposed allocation of land as Local Green Space - Twyford and Hurst

Open area adjacent to Colleton Drive, Colleton Drive, Twyford  
Twyford Parish Council Burial Ground & Millennium Garden, Station Road,  
Twyford  
Orchard Estate open space, Orchard Estate, Twyford  
Malvern Way open space, Malvern Way, Twyford  
King George V Field, Loddon Hall Road, Twyford  
Stanlake Meadows, Waltham Road, Twyford  
Hurst Park, Hurst Park Road, Twyford  
Broad Hinton open space, Broad Hinton, Twyford / Hurst  
Dinton Pastures, Hurst

3

Q16f To what extent do you agree with the new proposed allocation of land as Local Green Space - in Ruscombe

Ruscombe Wood and Pond, Castle End Road, Ruscombe  
Ruscombe Ponds (A), Castle End Road, Ruscombe  
Ruscombe Ponds (B), Ruscombe  
Church Green, Southbury Lane, Ruscombe  
Pennfields Park, Pennfields, Ruscombe

3

Q16g To what extent do you agree with the new proposed allocation of land as Local Green Space – Shinfield

Pearman's Copse, Ryhill Way, Shinfield

3

Q16h To what extent do you agree with the new proposed allocation of land as Local Green Space - Winnersh

Winnersh Meadows, Williamson Close, Winnersh  
Bearwood Recreation Ground, Bearwood Road, Winnersh

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Land surrounding the west of Old Forest Road (North), Old Forest Road, Winnersh

Land surrounding the west of Old Forest Road (South), Old Forest Road, Winnersh

3

Q16i To what extent do you agree with the new proposed allocation of land as Local Green Space - Wokingham

Keephatch Park Nature Reserve, Diamond Jubilee Way, Wokingham

Cantley Park (North), Twyford Road, Wokingham

Cantley Park (South), Twyford Road, Wokingham

Leslie Sears Playing Field, Reeves Way, Wokingham

Viking Field, Tanners Row, Wokingham

Elizabeth Park, Pyke Close, Wokingham

Woosehill Meadows, Arthur Road, Wokingham

Lowther Road sports field and play area, Lowther Road, Wokingham

Emmbrook Walk, Emmbrook Road, Wokingham

Waverley Way open space, Nashgrove Lane, Wokingham

3

Q16j To what extent do you agree with the new proposed allocation of land as Local Green Space - Woodley

Remaining part of Crescent Field, South Lake, Woodley

Ashenbury Park, Woodley

Aldermoors Nature Reserve, Alder Moors, Woodley

Vauxhall Park, Woodley

South Lake, Woodley

Malone Park, Woodley

Woodford Park and the Memorial Recreation Ground (also known as Coronation Fields), Woodford Park, Woodley

Sandford Park, Woodley

Redwood Play Area, Redwood, Woodley

Area between Mohawk Way and Old Colemans Moor Road, Woodley

Mortimer Meadows (North), Woodley

Mortimer Meadows (South), Woodley

Park between Masters Close and Marathon Close, Woodley

3

Q16k Please set out your comments on the new proposed designations of land as Local Green Space. If you would like to propose an amendment, please explain the change you would like to see and why

The Green Spaces in Swallowfield have not been included. Please can you add:

- Farley Hill George V Playing Field
- Farley Hill Cricket Field
- Farley Hill Bowls Club
- Riseley Recreation Ground and tennis courts
- Riseley Common
- Riseley Community Orchard
- The Marshes Local Nature Reserve, Riseley Common
- Swallowfield Recreation Ground
- Swallowfield Allotments – Calico field
- Swallowfield Meadow Local Nature Reserve
- Van Demans – 11 acre grazing field

We can provide coordinates for these locations.

**Q17 Other matters**

We would also like to comment on the HELAA assessment of the following sites:

**5SH013** – The relevant planning history is very important. The application from 2016 was rejected and then dismissed on appeal as there would be ‘significant harm to the character and appearance of the area’ and ‘encroachment of build into an open area of countryside.’ These are very significant points. We are concerned that the narrative in HELAA column I suggests that this site could be favourably considered – this should not be the case. The type of traffic generated from the existing business park has been very hard to reconcile with its proximity to Lambs Lane school and the residential nature of Lambs Lane. The wording on HELAA column I needs to reflect this and downgrade the site’s viability further.

**5SW005** - Site bounded by Trowes Lane (to the east) and Oakleigh Farm (to the west) We disagree with the HELAA assessment for this site (column I) that ‘Overall, the proposed development provides an opportunity for development which broadly conforms to the existing settlement form and landscape character.’ This is incorrect– and is contrary to the other columns that state:

- Town centre viability – ‘The site is beyond a reasonable walking distance from a defined centre.’
- Access is unsuitable: ‘site is beyond reasonable walking distance from defined centre’
- The site is ‘Greenfield’
- Flood risk: ‘Flood risks: surface water – YES, low to high risk, Groundwater – over 50% of the site has potential for groundwater flooding to occur at the surface’
- The site would lose the area valuable farming land: ‘Loss of best and most versatile agricultural land – YES/MAYBE’
- There would be loss of hedges and trees: ‘Loss of green infrastructure – MAYBE’
- There are inadequate services and facilities: ‘few services available within 20 mins walk’ Lambs Lane school ‘ accessed by a private vehicle’ – and also true for ‘secondary schools in Arborfield and Shinfield’
- The access, either by vehicle or on foot is inadequate: ‘narrow unlit road with no footpaths’
- Public transport provision is poor, and, as stated in HELAA on active travel: bus services are ‘infrequent and not providing a level of service considered to be good’ and access to the village only possible ‘through the committed site’ although there is no easy mechanism for this in the approved design
- Further, HELAA notes, more widely that the Acceptable level of Accessibility and Connectivity – ‘NO’

All of the above leads inexorably to the conclusion this is not a suitable site.

Based on the above the narrative in column I and the Suitability Conclusion in Column AM is wrong. The site is isolated and would not enhance or integrate properly with the existing settlement, compounded by the unsuitability of the vehicle and pedestrian access. The lack of local services and infrastructure are not addressed in HELAA. The HELAA conclusions need to be downgraded to prevent 5SW005 being seen as a potential addition to the sites list.

**5SW025** - Land at Robin Lodge Nursery. We disagree with the HELAA site suitability conclusion in Column AM as able to: ‘...achieve a satisfactory relationship to the existing settlement pattern.’ This is not the case due to the second point made in the conclusion that it would ‘perform poorly in respect of highways and accessibility issues.’ Access from Part Lane would mean that the site would be an outlier development, disconnected from the rest of the village.

**Climate Emergency**

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We're delighted to see the policies that relate to green energy to deliver on promises on Wokingham's declaration of the climate emergency. We also note the Renewable Energy Provision assessment on Halls and Wokingham South SDLs. However, we're disappointed not to see potential sites identified for renewable generation more widely across the borough – particularly as these need to be planned to link with the high voltage capacity of the electricity distribution network. Failure to adequately consider sites will lead to a degree of planning anarchy – as was shown by the approval of the solar farm beside Castle Hill Road, Farley Hill, where other more appropriate sites exist.

Should there be a levy on new developments for renewable generation, much as there is for development within the Thames Heaths Basin for SANG?