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Cris Lancaster,
Master Planning Team,
Wokingham Borough Council,
Shute End,
Wokingham,
RG40 1WL

22nd March 2010

Dear Mr Lancaster,

**Consultation on SDL Masterplan Supplementary Planning Documents for
“South of the M4 Strategic Development Location”**

I am retained by Shinfield Parish Council (SPC) to put forward their views on the above document. The Civic Parish of Shinfield entirely encompasses the South of the M4 SDL. It should be noted, at the outset, that SPC accept the allocation of yet another 2,500 houses, which in my view is remarkable, given the scale of development in recent years.

However my client's prime objection is that the Final Option proposals depart significantly from both the Inspector's Report (IR) and the recently adopted Core Strategy (CS) of Wokingham Borough Council (WBC). Furthermore, despite pledges that the master planning exercise be “community-led”, it is of great concern that the proposed final Option bears an uncanny resemblance to Option 2 put forward in the September 2009 consultation, which was least favoured by the local community but the option preferred by the Consortium.

SPC's two major objections are complementary: the distribution of the housing and the fragmentation of the SANG. With regard to the former, the CS states that:

Development in a series of locations around the periphery of the three villages is required. This approach should consider the relationship between the current built up areas and the open countryside. Opportunities to form new edges to the existing villages exist, allowing a managed transition between urban and rural...Shinfield could be extended to the west, east and north-west...¹

Why therefore are 1005 houses to be concentrated to the SW of Shinfield with a token 120 to the north east²? Furthermore SPC understand that an application for 175 houses to the north west of Shinfield is likely to be refused despite the fact that a transport depot mars the area, the rooflines of

¹ Wokingham Borough Council CS Development Plan Documenty (Adopted 29th January 2010) A7.17 b) & c)

² South of the M4 Strategic Development Location , SPD Feb. 2010, p. 17, Fig. 3.1

the houses are softened by a belt of trees and it is near local facilities. The exclusion of other landowners, such as the Diocese, is contrary to the IR: *all* landowners should have been involved in the formulation of the Draft SPD³, not just the Consortium. If the latter's intention is to reserve sites to the east of Shinfield, in the hope of developing them at a later stage, and thus achieving its original objective of 3500 houses, this is contrary to the IR because of the importance of preserving the character of the villages in terms of density and area⁴. Moreover there would be little in the way of new housing in the immediate vicinity of the proposed Science Park, as was recommended⁵.

The Inspector is at pains to emphasise the importance of gaps between settlements and the need for the SANG to be of a substantial width to prevent coalescence of Shinfield and Spencers Wood⁶. This view is endorsed by the CS⁷. How come, therefore, does the Draft SPD allow the fragmentation of the SANG by recommending:

- a substantial chunk of housing to SW Shinfield which would erode the gap to less than 150 m. which is devoid of any protection other than general countryside policies?
- the introduction of a cross route which had been ruled out by the Inspector as unnecessary because existing roads could cope with the new housing⁸?

Despite paying lip-service to the IR and CS⁹, the SPD actually recommends splitting the SANG into two locations¹⁰, whilst depicting the SANG as split into no less than five fragments on the map¹¹, one of which consists of a substantial area of water-meadows adjacent to the River Loddon. This would present a number of practical problems e.g. would the boarded walks expand with the rise of the water table and would they be safe for all users at all times? Water meadows provide an essential service in flood prevention without being domesticated for leisure purposes.

The SANG proposed in the adopted CS¹² would be multi-purpose:

- It would keep separate the villages of Shinfield and Spencers Wood as required by the Inspector, the CS and indeed recommended by the WBC Landscape Capacity Statement in 2008;
- It would provide a substantial area of green space for informal recreation with year round access, laid out with car parks, with a choice of routes of around 2.5 km long with a variety of surfaces to cater for the need of various users. This would comply more adequately than the SPD proposals with the South East Regional Assembly Guidance of June 2008¹³. Natural England's position is that whilst the proposed SANGs "tick the boxes" the single SANG would be preferable¹⁴.

³ IR Appendix B, pp 12, 13, D41, D43, D46

⁴ Ibid. para 5.20 & 5.22

⁵ Ibid para. 11.6

⁶ IR op cit, 5.22

⁷ CS p.108

⁸ IR para. 5.28 & 5.29 versus SPD para. 3.1.6

⁹ SPD, op cit, paras. 2.3.4, 3.1.10, & p.24, 1e(iii)

¹⁰ Ibid. P.23 Para. 1c(vi)

¹¹ Ibid. P.17, Figure 3.1

¹² CS p.108

¹³ www.southeast-ra.gov.uk. This document provides detailed instructions on "Must Haves", "Should Haves" and "Desirable" when designing and maintaining SANGs.

¹⁴ Conversation between MarcTurner at Natural England and Dr Le-Las. Monday March 22nd.

- A single SANG would be of greater value ecologically and is thus supported by Natural England¹⁵.
- It would be more likely to achieve its objective of attracting local residents away from the Thames Basin Heaths SPA.

Neither the character nor the locations of the proposed SANGs comply with the Landscape Capacity Document 2008, the extant SANG Guidance, the IR and the adopted CS.

In the opinion of my clients there are too many serious discrepancies between, on the one hand, the IR, the CS and the public consultation, and the Draft SPD. This makes a mockery of the relevant planning law and policy. What are the weighty material considerations¹⁶ which can outweigh a CS barely two months old? WBC should be reminded that:

“SPDs should not be prepared with the aim of avoiding the need for the examination of policies which should be examined”¹⁷

It could be laying itself open to a legal challenge should the Draft SPD be adopted in its current form.

In addition to major objections over the residential sites and the SANG, SPC is concerned about two other matters:

- The fact that the new crossing of the M4¹⁸ will not materialise until a later stage, as part of the Science Park development.
- The Ryeish Green school site, including The Leisure Centre, could well be used for the proposed primary school, which would have the benefit of retaining the existing sport and leisure facilities within the SPD. SPC understand that the Consortium agrees with this proposition.

SPC trusts that WBC will be receptive to the views of the community given the importance placed on such involvement by PPS1¹⁹ and the fact that SPDs should comply with DPDs²⁰.

Yours sincerely,

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¹⁵ Ibid

¹⁶ PCP Act 2004 s38(6)

¹⁷ PPS12 Local Spatial Planning (2008) para6.1

¹⁸ CS A7.17

¹⁹ Delivering Sustainable Development (2005) paras.40-44.

²⁰ PPS12 op cit.