

For the attention of Mr S Roskilly

Dear Sir

Regarding: - Objection to Outline Planning application ref 21/00478/OUT, Bloor Homes 150 houses west of Wokingham Road.

Please register my strongest objection to the above outline planning application by Bloor Homes (the applicant).

I note that this application is in general terms a repetition of the initial Bloor Homes outline planning application that was refused in 2019. Albeit that the current application makes a few and very limited changes to the refused application these do in no way overcome the reasons for the original refusal. Indeed the original reasons for the refusal are still very much applicable. The following commentary also highlights many fundamental flaws and safety concerns in respect of the current minor modifications to the initial 2019 submission.

Notwithstanding the above I have set out my concerns and related comments as follows. Where reference is made to the earlier and refused Bloor Homes planning application these are noted by the prefix of "initial":-

1 Bracknell Forest Council 5 Year Plan

- 1.1) I am aware that Bracknell Forest Council (BFC) have developed key Local Plans to provided potential sites to meet their future new housing targets. The applicant's site does not form any part of BFC Local Plan's for housing developments. I also note that these targets are intended to provide a reasonable percentage of affordable and social housing. I note that this point was acknowledged by the appeal inspectorate in a recent appeal by a similar developer to build houses on land within the

Borough that also had not been included within BFC's Local Plans. The inspectorate noted that BFC had made significant progress in demonstrating its "Five Year Housing Supply. **I feel that this substantiates BFC's view that they have sufficient sites elsewhere (with contingency) and are progressing to meet their future housing targets.**

- 1.2) I note also that BFC's housing statistics have held up well in recent times when taking cognisance of the significant production impact of the Covid related lockdowns. Clearly the Covid impact will also have some influence on the timing of future BFC's planning strategies.
- 1.3) With reference to the applicant's initial pre-submission discussion with BFC it is noted that this point was also made, reference the initial Planning Statement pages 49 and 50. The conclusion is that the Bloor Homes application is not needed to achieve the Council's 5 year housing supply of deliverable housing. It is acknowledged that BFC have good and well thought out Local Plans all progressing to achieve housing objectives. Indeed BFC are also progressing infrastructure projects within the Borough to accord with the identified sites. The Bloor Homes application site not being one of these.

2 BFC's Emerging Plan

- 2.1) **Furthermore BFC recently substantially concluded their "Emerging Local Plan" in readiness for final submission to the Secretary of State. The Emerging plan is intended to cover BFC's new housing strategy up to the 2030s. Their Pre-Submission Housing Background Paper (consultation version, March 2021) has considered the Bloor Homes application site, this has a reference of SAND3. The BFC summary, following detail consideration, notes that "having regard to the Site Selection Methodology (which included the Sustainable Appraisal), site specific evidence and comparative assessment of all sites, the site is not proposed for allocation through the Bracknell Forest Local Plan".**

The report goes on to make the recommendation: - DO NOT ALLOCATE THE SITE.

I fully concur with the BFC appraisal.

- 2.2) I am a little disappointed by the Bloor Homes response to the comment and recommendations contained within the Emerging Local Plan. With reference to the Bloor application documentation "Emerging Plans in clause 4.42 of their Planning Statement they appear to be attempting to dismiss all of the recent and very professionally prepared, planning

strategies produced by BFC. Bloor have attempted to disregard all of the BFC efforts on the basis that there may be some “unresolved objections”. I would suggest that this is an attempt by Bloor Homes to dismiss the weight of evidence that BFC have produced that concludes that the Applicant’s site should **not** be included within the future Local Plan. As noted elsewhere within my comments the site is also **not** included in the current Local Plan.

3 Response to Bloor Homes Planning Statement:-

3.1) Nearby Housing Schemes:-

BFC has recognised the requirement to produce a significant number of dwellings including affordable and social. Within reasonable walking distance of the Applicant’s site the following housing developments have either been recently completed, under construction, have received planning permission, or have land allocated for Local Plan/Emerging Local Plan development. These include:-

Road Research Site in Crowthorne 1000 dwellings (construction has commenced, with initial houses sold).

Sandhurst Gardens, Sandhurst 108 dwellings (construction recently completed).

Broadmoor Crowthorne. 130 dwellings (recently completed).

Dukes Ride/Wokingham Road, Crowthorne 210 dwellings (Site allocated within BFC’s Local Plan and also recommended for inclusion in the Emerging Local Plan).

Moulsham Lane, Yateley 150 dwellings (construction recently substantially concluded). 0.7M (Hart DC)

Infill sites in the Little Sandhurst area at The Fox and Hounds, Handcombe Road, Scotland Hill, Crowthorne Road, Windrush Heights, Rose and Crown. These developments are either very recently completed or under construction and together with other infill sites have contributed about 50/60 new dwellings.

There has also been a recent huge increase in nearby sheltered housing schemes in Yorktown Road, Sandhurst Road and the Hampshire Lakes development.

Furthermore following the recent production of the “Emerging Local Plan” BFC have elected to recommend for inclusion other sites in Lower Church Road (ref SAN9 and SAN10), these sites not having the constraints associated with the Bloor Homes (SAND3) site. The Lower Church Road site that has received a BFC recommendation to be included with the future Local Plan is located to the south of the road

and includes potential provision for many dwellings. This site does not have anything like the impact on the Blackwater Valley vista that the Bloor Homes application site would have and is much better suited for transport links. Indeed it is unlikely to be visible from any of the key areas of the beautiful Valley as it does not have the elevation of the Bloor Homes application site. Furthermore it has easy and suitable access to Sandhurst, the access being much shorter than the Applicant's site and does not involve potentially dangerous crossing of the A321 Wokingham Road. It would utilise the current pelican crossing.

It is also likely that any future planning approval will include a drop off layby and associated parking directly opposite St Michael's School. This would be a far better solution than the Bloor Homes proposal to provide a car park that could be considered to be too remote from St Michael's.

Based on the above I feel that BFC in respect of the content of their Emerging Local Plan to include SAN9 and SAN10 have made a very sensible and wise decision to promote the site for future housing and reject the poorly located Applicant's site (SAN 3).

Should the SAN9/10 approvals go ahead it would be a very simple procedure to install a good school drop off/layby directly opposite the entrance gates of St Michael's School. The adjacent car park in Lychgate with encroachment into the SAN9/10 site could easily be adapted to provide additional parking for school use.

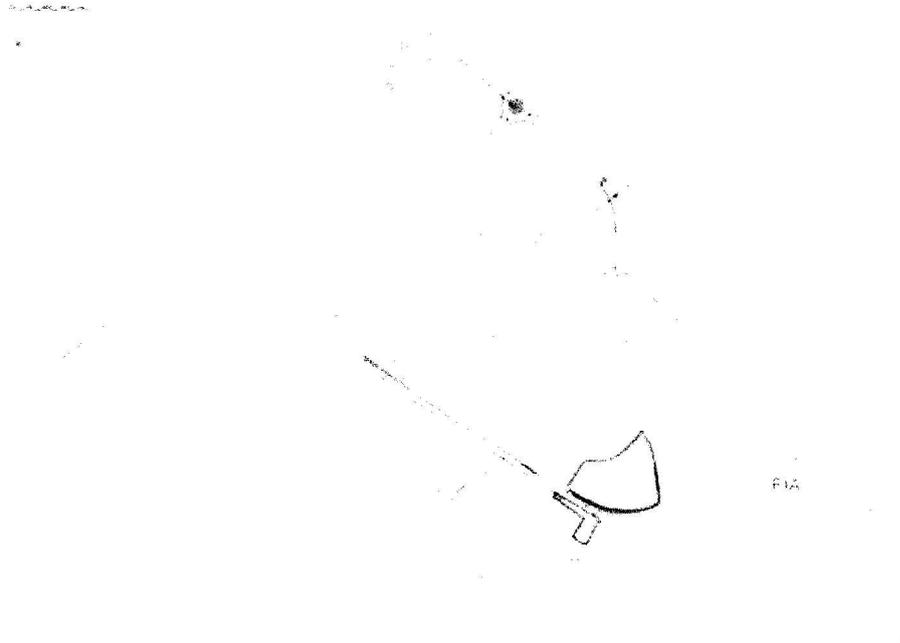
The SAN9 and SAN10 sites would also provide the opportunity to produce a significant proportion of affordable housing.

Clearly when considering all matters the development of the SAN9 and SAN10 sites has far more benefit than the Bloor Homes site of SAN3.



The photograph on the left shows Lower Church Road directly opposite the school gates. When/if SAN9 and San10 were to be developed a school drop off point could be easily incorporated without the need to

remove any significant vegetation. The photograph on the right shows the existing car park in the entrance to Lychgate, it is also near to the school entrance. It would be a very simple task to increase the size of this car park by a small encroachment into the SAN9/10 site.



The above marked up Bloor drawings shows the remoteness of the applicants proposed car park for St Michael's school use. It also shows the benefits if the SAN9/10 sites were to be developed. If BFC's Emerging Local Plan came to fruition to include the SAN9/10 sites a drop off layby and a nearby school car park could be incorporated. These would be far more convenient than the Bloor (SAN3) proposals.

I would reiterate my agreement with the very sensible BFC decision to include SAN9 and 10 within their Emerging Local Plan and to reject in inclusion of the SAN3 Bloor Homes site. The SAN9 and 10 site would also be very simple to screen using appropriate planting.

3.2) Response to Bloor Homes Planning Statement associated with demography:-

As a footnote to the above I feel that the Bloor Homes are being a little disingenuous as regards the statements they have made within clause 5 of their Planning Statement. They make the following comment:-*"A lack of housing provision has demonstrated the growth of the resident population, significantly increasing the representation of older people without the allowing for the replenishment of the younger population. This would lead to an increasing imbalance demographic profile if allowed to continue, with the long-term consequences for the vitality and sustainability of the local community. This suggests that new*

homes are need in Sandhurst to enable the attraction and retention of families” (end of their quote)

It is apparent that the composer of the Bloor Homes planning statement had not bothered to thoroughly research the matter. With reference to the above there are recently constructed dwellings or dwellings that feature in the forthcoming “Local Plan” that equate to circa 1730 units, all of which are within reasonable walking distance of the Bloor Homes application site. These homes will obviously have a high percentage of take up by younger/ family households.

In respect of the comments regarding the age demographics of the Sandhurst area it would appear that Bloor Homes have not checked the numbers of nursing/retirement/sheltered house within reasonable walking distance of the site. Indeed if they had done so they would have found that associated numbers of these specialist homes is extremely high and indeed far in excess of the percentage comparison with traditional homes found in a typical UK town.

It is therefore no small wonder that the Sandhurst/nearby area demographic would indicate many older people.

Notwithstanding the above it is a commonly known fact that the fertility rate in England is in decline. Statics show that for the population of the country to remain level a fertility rate circa 2.1 is required. In recent years this has dropped to circa 1.8. Projections in the coming few years indicate that the factor could drop to about 1.4 to 1.5. Indeed it is something that BFC have taken into account when making decisions regarding their school building programme. In the northern parts of the borough, despite this location being an area of high volume new dwelling construction two schools that were intended to be built to cater for the new housing have now been put on hold.

For Bloor Homes to infer that a dwindling fertility/berth rate is particularly applicable to the Sandhurst demographic and housing supply is considered to be fundamentally flawed. The current reduction in birth rate is repeated in many parts of the borough and indeed nationally.

Bloor Homes have also misinterpreted the future spare school intake numbers in the Crowthorne and Sandhurst areas. Schools in this location have had to have a larger than normal capacity reserve to take into account the numerous short term school places that are required to cover the local traveller sites and the numerous families that are associated with their short term attendance/employment at the Sandhurst Military Academy.

It is therefore averred the Bloor Homes are making misleading and incorrect comments/conclusions within their planning statement and as a consequence should be disregarded.

BFC have over the years instigated and delivered well thought out Local Plans for which most residents are very satisfied. BFC have additionally taken great care to protect key areas of the countryside for the enjoyment of the residents. This of course includes Horseshoe Lake and the surrounding Blackwater Valley. I must say that I fully commend BFC for their sterling efforts of the past 30 or so years to turn the old gravel pit workings in the Blackwater Valley into a super picturesque nature reserve and water sport centre for all to enjoy.

I am therefore very disappointed that Bloor Homes appear to be attempting, albeit poorly, to nit-pick BFC's professionally and sensibly prepared planning strategies. BFC have a very detailed knowledge of the local area that they use to the best of their ability to achieve housing target objectives and provide surrounding ambience that is pleasurable to live nearby.

I additionally note that many of the Bloor adverse comments as regards alleged shortfalls in BFC's Local Plans and Emerging Local Plans are accompanied by little or no substantiation. Clearly without any related substantiation it is impossible to respond in detail.

I would therefore feel that the BFC's well researched planning strategies carry far more weight and accuracy than the biased views of a **"here today gone tomorrow"** developer who I am sure has his profit margin as his lead objective rather than the long term needs of the Sandhurst community.

4 Key points as regards "Protection of the Countryside".

- 4.1) The application site is located on land which is outside of "settlements" and is indeed the backdrop to the picturesque Blackwater Valley. It also forms part of the "strategic gap" (reference BFC Map 3 Core Strategy Key Diagram) between Little Sandhurst and Yateley. The application site land is located in an area that BFC have designated as countryside that it aims to protect for its intrinsic character and beauty. The site is particularly important as a backdrop to the Blackwater Valley as elements of the site are predominant and circa 20m above the valley.

I note that in all recent nearby planning applications, albeit that they have only been for a single dwelling or adjustments to existing houses, that BFC have rigorously refused planning applications for reasons that they "would adversely affect the rural character and visual amenities of this countryside area, including the Blackwater River Valley landscape setting".

The planning refusals relate to planning applications referenced 16/00524/FUL, 07/01062/FUL and appeal decision

APP/R0335/A/08/2071060. Indeed the initial Bloor Homes application for this site was refused in 2019 for exactly the same reasons.

It should be noted that the appeal decision by the Planning Inspectorate related to the refusal to agree to the enlargement of an existing house within the lower levels of the valley. This upheld BFC's earlier refusal decision. These decisions would of course pail into insignificance if the Bloor Homes application were to be given permission.

- 4.2) With reference to the applicant's initial Planning Statement it is acknowledged that BFC have confirmed that "the site is outside of settlement areas and is contrary to policies CS1, CS2, CS7, and CS9 of the CSDPD and EN1, EN20 and H5 of the BFBLP.. **BFC have previously said that the proposed development would be harmful to the intrinsic beauty and character of the countryside and to the appearance and character of the area. The summary being that any houses on the applicant's site would be contrary to BFC's vision to protect key elements of the countryside. As noted previously this is particularly important as the site occupies high and predominant land that forms the beautiful backdrop to the Blackwater Valley. This vista is treasured and should not be ruined by the sighting of a housing site that is not required to achieve BFC's housing targets. These comments very much apply to the current application.**

5. **Impact of the application houses on the countryside:-**

The following photographs have been taken at various locations round the perimeter of the application site. To enable an indication of what I feel is the potential adverse impact on the countryside the same photographs have been duplicated with an overlay included that shows an indicative vision of the application houses.

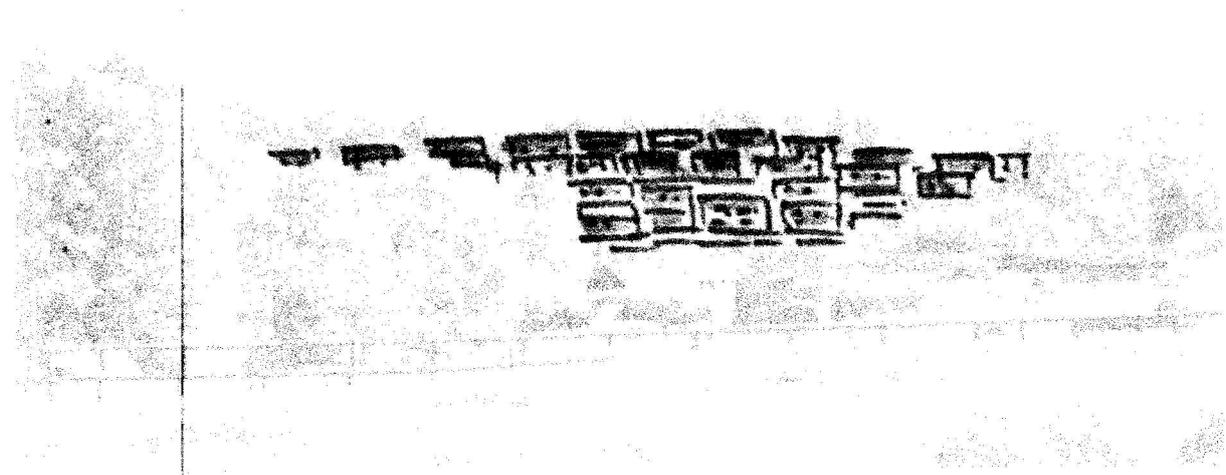
5.1) **View from Lower Church Road.**



View from the gate in Lower Church Road, with potential houses (note: - the approximate scaling of sketches is based on a pro-rata of the existing fence heights). The photograph was taken about 150m from the Lower Church Road junction near Horseshoe Lake. The intended car park would be in the foreground.

Whilst it is acknowledged that the applicant wishes to retain the trees to the north of Lower Church Road these will in no way prevent the “urbanisation” appearance of the road when driving to and from Horseshoe Lake.

5.2) View from the Bridleway near Ambarrow Woods.



Indicative view of the proposed housing from the Three Castles Path Bridleway (taken from path just west of Ambarrow Woods). Houses are scaled pro-rata of fence heights. Far more of the development will of course be seen during late autumn and winter.



The same scene/view from the Three Castles Path Bridleway as existing with Perry Bridge Farm in the valley. The background hillside provides the backdrop to the picturesque Blackwater Valley. The Bridleway from which the photograph was taken has historical interest as it forms part of the famous Three Castles Path that is based on the travels in the 13th century of King John between Windsor and Winchester. The rolling hills of the Blackwater Valley form a key backdrop of the Sandhurst to Winchfield section of the path. I feel that it is reasonable to conclude that if the application site was developed it would completely alter the pleasant countryside ambience. The pleasant countryside of rolling hill and woodland would be replaced with what would now appear as a massive housing estate overlooking a field. It is considered that this would adversely affect the rural character and visual amenities of the surrounding countryside.

5.3) View from the A321 Wokingham Road.



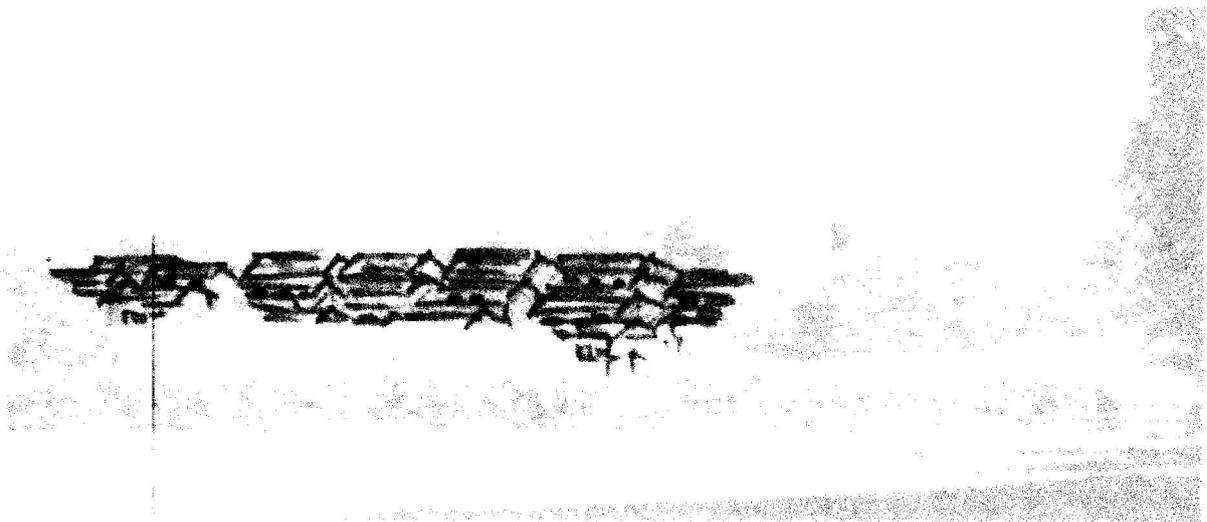
View from the east side of Wokingham Road between the Church Road and Maybrick Close junctions with the applicant's intended dwellings superimposed.

It can be seen from the sketch there will be “urbanisation” of land that is currently outside of defined settlements and land which has been rigorously protected by BFC for its intrinsic value as countryside.



Existing view of the rolling hillside to the west of the A321 Wokingham Road taken between the Church Road and Maybrick Close junctions. Although not clear from the photograph there are views in this location to as far west as Eversley. These public views would be obliterated if the Bloor housing application were allowed to be progressed.

5.4) View form the Bridleway near Lower Sandhurst Road/Horseshoe Lake.



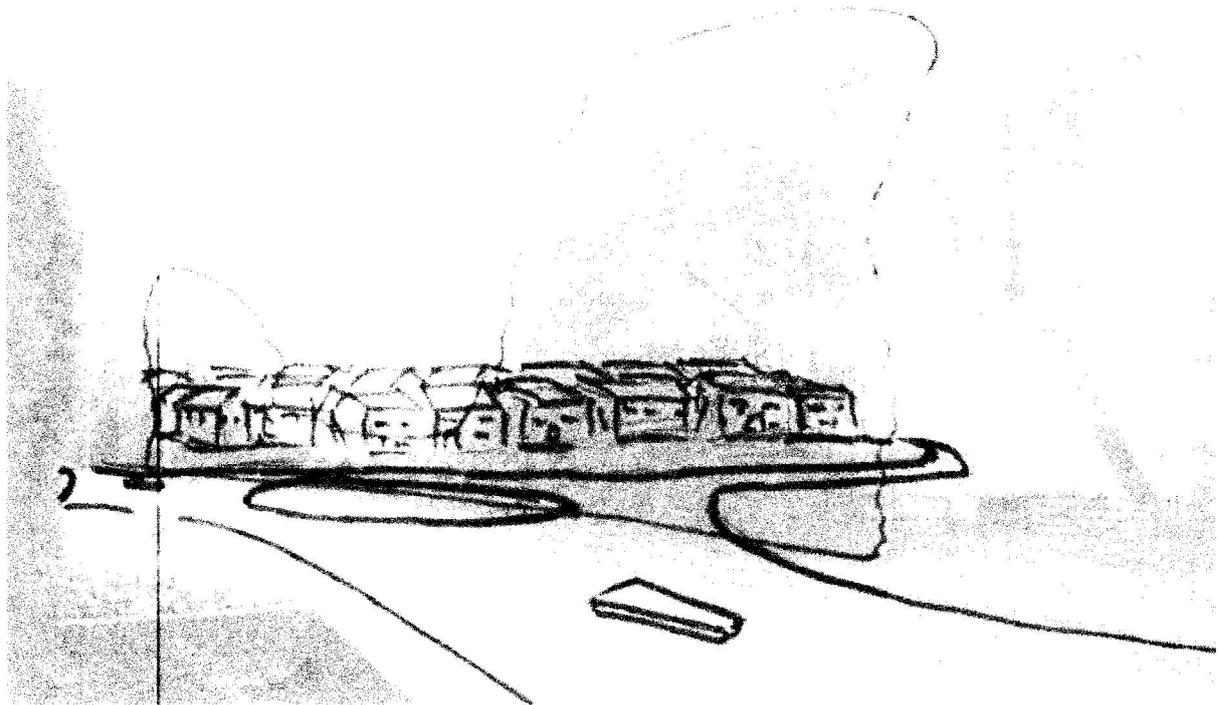
Indicative view of proposed dwellings viewed from the Three Castles Path bridleway near the gate with access to Lower Sandhurst Road/Horseshoe Lake. Clearly during autumn and winter periods the houses will be even more prominent, particularly as the screening of housing on the right hand side will be lost.



Current view of the application site from the Bridleway near Horseshoe Lake. Note the rising contours within the application site. The Blackwater base AOD is approximately 50m and this rises within the application site to circa 70m. Clearly if the site were to be developed the intrinsic character and beauty of the surrounding countryside would be significantly diminished.

It seems to me that the only logical action to take in order to protect this valued and picturesque countryside is to refuse the application.

If the application were to be approved the local countryside and Blackwater Valley backdrop will be destroyed forever. As noted previously it would also be contrary to all preceding planning decisions that have sought to retain and protect this valued countryside.



An indicative view of the applicant site taken from the A321 just north of Maybrick Close. The outline in orange shows the trees and hedgerows that the applicants wishes to remove. Superimposed in brown is the applicants proposed road layout including a roundabout. Indicative proposed housing is also shown.

With reference to the applicants initial Planning Statement (page 52, item 7) BFC note that “the creation of the access would result in the loss of 5 trees (the current application is varied from the pre-application, but similar philosophy, however, still applies) and a significant strip of exiting hedging and shrub in order to accommodate visual splays. This side of the Wokingham Road is characterised by its trees that mark the start of the countryside/rural setting down to the river Blackwater. The level of clearance required to provide an adequate safe access to dwellings would result in a detrimental impact on the character of the Wokingham Road street scene and the wider countryside setting”.

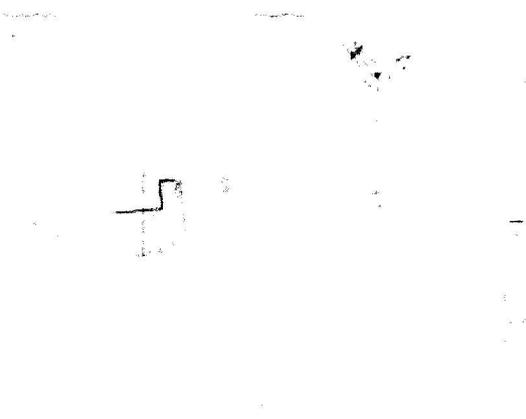
I fully concur with BFC’s comments. In respect of the current application the foregoing comments also apply.



The view from the A321 as existing. It can be seen that the vista provides a rural backdrop and established a defined strategic gap between the settlements of Little Sandhurst and Yateley.

5.5) Tree removal:-

The Bloor application requires some key mature trees to be removed. I am also of the view that other trees are at high risk of serious damage to their roots during the potential construction phase.



The Bloor drawing (left) ref 05194A-PA-006 shows the design intentions for pedestrian and cycle access from the proposed dwellings and into/across the A321. The proposals note that one mature oak tree needs to be removed and two other substantial adjacent trees will require root protection during the construction phase. In reality all three trees will be destroyed. All three trees are located at the top of a steep

embankment. The retaining walls and ground grading required to accommodate the new construction would undermined and necessitate the removal of about 1/3 and 1/4 respectively of their root mass. The retaining wall will also require foundations. The total excavation depth from the top of the embankment to the founding base of the retaining wall will be approaching 3 meters. I feel therefore that the likelihood is that all three mature trees will be destroyed.

As an aside when the details of the access ramp proposals are viewed on drawing 05194A-PA-006 it should be apparent to all that the access across the A321 is not safe for use, with particular emphasis on children. This matter is also covered elsewhere within my comments.

6 Site Sustainability:-

Bloor have produced both a Travel Plan and Transport Assessment Final Report. From a quick uninitiated glance they appear to have completed what could be described as a “box ticking” exercise in an effort to try and proffer positive site sustainability matters. However, when looking at the detail of what is intended it is apparent that the site has many sustainability shortfalls and indeed many access issues that I consider to be poor practice and could be viewed as unsafe. I also have concerns as regards the data used for Bloor’s traffic assessments as I believe these do not reflect a reasonable estimate of future traffic levels. The Bloor report additionally fails to include a traffic assessment that reflects what all locals know is that the most congested road in the area is the Yorktown Road east of Sandhurst Railway Station towards Camberley. I can only conclude that this decision by Bloor was made to avoid highlighting the obvious conclusion.

- 6.1) It is my view Bloor have underestimated the sustainability of the site when reference is made to access for public transport and walking. Most of the salient local facilities are over 1.2Km distant (Shops, main bus stops, doctors, dentist etc.). It is generally considered that this distance would probably encourage car usage rather than reduce it. Indeed this particular point was made very clear by BFC to the applicant during the initial pre-application discussions. The site sustainability is therefore not in accordance with the planning aims and desires that BFC are promoting.
- 6.2) There are very limited footpaths alongside the application site side A321 Wokingham Road. Pedestrian routes from the site must therefore immediately cross A321 to gain access to footpaths leading to Sandhurst.
- 6.3) With reference to Bloor Homes application document ref “Baseline Transport Conditions Fig 3.3 which shows the proposed pedestrian and cycle routes between the site and trip attractions the following comments are make:-

It is noted that the suggested/ proposed footpath from the application site to Crowthorne assumes it can include a pedestrian crossing of the railway line within Ambarrow woods. It would appear that Bloor Homes are attempting to

promote reuse of a defunct unmanned and unlit crossing of a busy railway track.



The photograph on the left above shows the footpath from the Wellington College side of the main Guildford to Reading railway track that Bloor Homes are recommending to use as one of the major pedestrian routes for the residents of the application site to use when walking to Crowthorne. The photograph on the left shows the pedestrian railway crossing from the Application site side of the track. Please note that the track is unlit, unattended and open. It depends purely on the user avoiding speeding trains. Notwithstanding the fact that the crossing has a temporary closure in operation do Bloor Homes really believe this is a safe route for children and other pedestrians to use. It is unclear what Bloor propose for say mobility scooter users, those with shopping trollies, pushchairs or indeed any with the slightest physical impediment. From my viewpoint I cannot take Bloor's proposals seriously. Clearly Bloor have given scant regard of the physical obstructions and dangers that this route contains. During periods of rain the footpath is very muddy for part of its length.



The photograph of the left shows the woodland path in Ambarrow Woods that is immediately prior to Bloor Homes proposed pedestrian crossing of the railway track. Although there are some tarmac surfaced footpaths within Ambarrow many of the paths have a mud/natural/tree rooted sub-base.

The photograph on the right shows the pedestrian access to Ambarrow Woods from the Wokingham Road following some rainfall. With reference to Bloor Homes application drawing reference Fig 3.6 both of the paths shown above form part of Bloor's proposed pedestrian routes for the residents of the application site if they intend travelling towards Crowthorne Station and the local post office.

For much of their duration the routes proposed by Bloor are unlit.

I would therefore contend that the pedestrian routes shown above and as proposed by Bloor Homes are unsuitable for use as a key pedestrian route associated with a 150 number housing scheme for use on a regular and everyday basis. These footpaths are only of practical use on fine days in daylight when kitted out with hiking or wellington boots or for those who use a heavy duty mountain bicycle.

I would also add that if a pedestrian tried to avoid the tortuous route through Ambarrow Woods and over the Crowthorne to Sandhurst railway line they would have little alternative but to walk the route alongside the A321 Wokingham Road. This is considered unsafe as for much of length where the road passes through Ambarrow there are no footpaths on the sides of the A321. Much of the road north of the application site is also unlit.

Bloor have also proposed an alternative and longer footpath route via Church Road and Cheviot Road in Little Sandhurst. Due to its longer length I doubt very much if this route would be selected by the potential residents. It also for

much of its length is a rough and unlit track and has similar characteristics to the paths through Ambarrow, all as described above.



The photograph on the left shows the Bloor alternative longer path towards Crowthorne upon leaving Cheviot Road. This is one of its better surfaces. When the path runs parallel with the railway near Crowthorne its surface is quite muddy. The vast majority of the route is unlit.

This walking route is clearly only suited to the able and appropriately attired people. It therefore cannot be considered appropriate for guaranteed every day and all day usage

6.3) Pedestrian and cycle routes proposed by Bloor for applicant site residents leaving the site and travel south to Sandhurst.

As noted elsewhere within these comments to Bloor Application site in not within the settlement area of Sandhurst/Little Sandhurst.

The restricted footpath on the A321 Wokingham Road between the Church Road and Lower Church Road junctions.

The current Bloor application appears to have reduced emphasis from its initial recommendations for the use by pedestrians of the footpath on the east side of the A321 between Church Road and St Michael's School. Although this may provide a solution for Bloor Homes "tic box" sustainability response the footpath will inevitably be used by many residents of the SAN3 application site because it is available and indeed, by default, will need to be used by those accessing and leaving the application site from the proposed pedestrian access off the A321 adjacent to Ryefield.

If walking south/south east the bus stops in Sandhurst are also over 1.2Km (0.75M) distant and would need to be accessed via a single narrow footpath adjacent to the narrow and busy A321 between the Church Road and Yateley Road junctions. This particular footpath is generally only 1.3 to 1.4m wide. This path is too narrow for pushchairs to safely pass or indeed a mobility scooter to safely pass pedestrians. There is no space to step on the inside of the path due to retaining walls and fences. Using the footpath during busy times is considered dangerous as wing mirrors from passing commercial traffic often over-sail the footpath.

The following photographs are intended to demonstrate the potential safety issues associated with the roadside footpaths should usage be increased.



The above photographs (looking south) shows the single side footpath to the east side of the A321 Wokingham Road between the Church Road and Yateley Road junctions. Note particularly the retaining walls and fences to the east side (the remote side) of the footpath and the narrowness of the busy A321. As noted within this letter's commentary if two large commercial vehicles meet on this road the south bound vehicle needs to be very near the footpath kerb and as a consequence wing mirrors over-sail the path at head height.

An additional problem that should be apparent from the above photographs relates to the potential use of bicycles that the applicant appears to be attempting to encourage. As the A321 is narrow all vehicles, and in particular larger commercial vehicles, need to cross onto the opposite carriageway when passing a cyclist. As can be seen from the photograph there is no potential of introducing any cycle ways. At busy rush hour times traffic will be slowed to the speed of a cycle until such time as there is a clear spot in the traffic travelling in the opposite direction. Cyclists will also be slowed on uphill elements of the road. It is proffered that this particular stretch of road should, for safety reasons, not be one that cyclists should be encouraged to use.

- 6.4) Although not included within the current application I have noted below a reminder of the respond that applicable to the in initial application. This has been added such that the reader can fully appreciate the limits on sustainability that the site has.

The local and very limited (two days a week remote from rush hours) shopping mini bus service to which the application refers cannot be considered a serious proposal to convert to a regular service as the roads through Little Sandhurst are far too narrow to accommodate a regular bus service. Currently when a car meets a large commercial vehicle in High Street Little Sandhurst it is normal procedure for the car to have to reverse back up the road and temporary park in spaces between parked cars. Much of High Street Little Sandhurst is only just over 5m wide. Large commercial vehicles cannot pass each other on many of roads through Little Sandhurst without the need of partially park in a side road. The roads has many speed humps.

Any assumption by the applicant in their initial submission that it may be possible to provide regular traditional bus services through Little Sandhurst should, in my view, be discounted on the basis of safety issues. Indeed good practice design procedure for bus services require roads to be of 6.75m wide.

Based on the above it is considered that routing regular buses services (particularly during rush hours) via Little Sandhurst cannot be instigated without significant traffic flow problems and safety issues. It should therefore be discounted.

The respect of the current application the Bloor Travel Plan (fig 3.6) and para 3.9 notes that there are formal bus stops in Church Road, Little Sandhurst, at a distance of 600m from the application site, and High Street at 450m from the application site. **This statement made by the applicant is a little misleading as there are no physical bus stops in Church Road and High Street Little Sandhurst.** Some of the related details shown on Bloor Fig 3.6 (public transport stops) should therefore be considered erroneous. The service to which Bloor refers (and noted above) relate to a minibus that collects, generally retired residents, 2 days per week to take them to a local supermarket. This service cannot therefore be considered as a regular service

that may be considered a major attraction for residents of the application site to not use their cars.

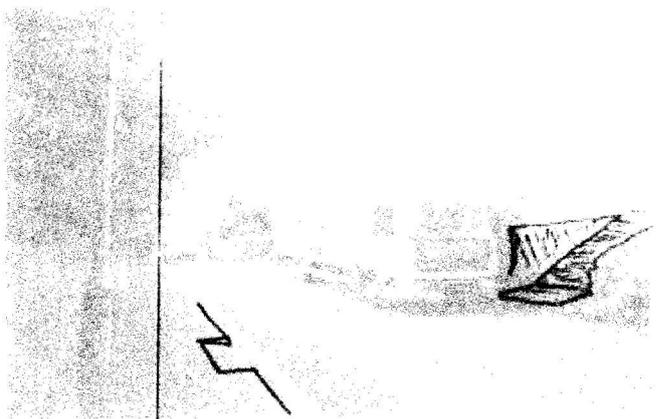
The only and nearest regular bus service is the one that exists at present which has its nearest bus stop located in Yorktown Road Sandhurst. As this stop is circa 1.5km distant from the application site it is not considered that it would encourage non-car usage.

With regard to the Bloor Planning Statement fig 3.3 the drawing incorrectly notes that there is a convenience store in Little Sandhurst. The store was demolished a number of years ago and has been replaced with houses.

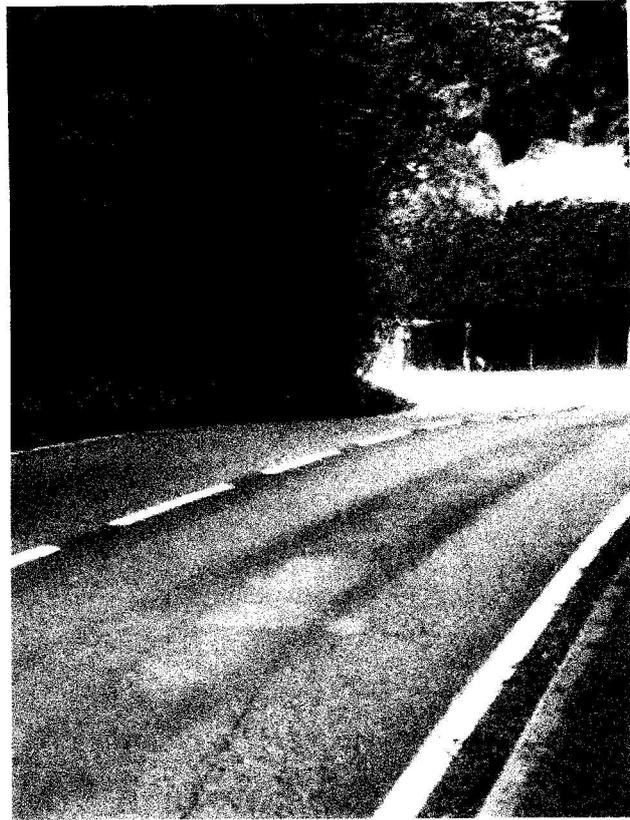
6.5) Concerns regarding safety relating to the applicants pedestrian site access to the A321 Wokingham Road.

For much of the A321 Wokingham Road between the Church Road and Yateley Road junctions there is only a footpath (albeit narrow) on the remote side of the road from the application site. Any pedestrians from the site, including school children will therefore need to cross the busy A321 to make any use of the path.

The photograph below shows the applicant's intentions as to how they hope the access can be achieved.



The adjacent photograph shows a superimposed sketch of the applicants proposed pedestrian crossing of the busy A321 Wokingham Road. The details are taken from Bloor application drawing 05194A-PA-006. Albeit that Bloor have now incorporated a local handrail barrier at the foot of the sloping approach path I do not consider this a safe site access.



The photograph of the left is viewed looking south on the A321. To the left of the photograph the island bollard to Church Road can be seen. Bloor are intending to position a pedestrian crossing immediately north of the Church Road junction. It has an approximate location about 7m in front of the oncoming van in the photograph.

The photograph on the right is viewed looking north on the A321. The Church Road junction is on the right of the photograph. The Bloor intended pedestrian crossing is out of sight just round the bend in the road. For a car on the left hand side of the road the visibility distance round the bend will be much worse than the photograph shows.

Based on the above I feel that the proposed Bloor crossing of the A321 is unsafe. Albeit that this part of the A321 is within a 30mph speed limit the open rural character of the road regularly leads to traffic travelling at speeds well in excess of 30mph. From what I can make of the Bloor traffic information it could well be that Bloor have used a traffic speed of just over 30mph for assessing approach sight line distances. From their drawing I am of the view that the sight line calculation may also not have taken cognisance of the growth of vegetation on the western side of the A321. This will could of course restrict sight line distances.

My feel is that when calculating crossing visibility requirements a "desirable visibility" distance should be based on "percentile approach speed" of well in excess of 30mph. Clearly vegetation encroachment of a sight line should also be considered. I therefore believe that the Bloor assumptions fall short of what would be expected

from a prudent designer and that the **proposed pedestrian crossing near Church Road should therefore be considered unsafe.**

7 The Applicant's Traffic Survey

- 7.1) The applicant has produced a traffic survey that appears to be very biased in its conclusions:-

A traffic Survey carried out at the beginning of the holiday period (late June 2018) and indeed during glorious sunny weather cannot be deemed to be representative of average traffic conditions.

The Traffic Survey appears to have failed to take full cognisance (apart from the Alford Close Development) of nearby large housing developments that are already under construction, have received planning permissions or are included within BFC's local plan. Future traffic assessment for the Sandhurst area requires specific project input and not just a simple "generic increase" assessment.

The Traffic Survey appears to have underestimated the traffic generated by the application site as it failed to fully take into account distances to service centres and useable bus stops (that is those over 1.2KM distant).

- 7.2) As a consequence of the remoteness of the application site from local facilities I believe that car usage will be much greater than the figures noted within the Bloor traffic plan. As it is likely that most of the houses on the application site would probably have two or more cars per household it is extremely likely that car usage from the 150 dwellings would be far in excess of the Bloor estimate.

Car use of course being encouraged due to the remoteness of public transport, community centres, doctors, dentists, and the schools problem noted above.

I therefore consider the Bloor travel plan to be fundamentally flawed.

- 7.3) The Traffic Survey also failed to assess the impact of traffic on one of the main local bottlenecks, I refer here to the Yorktown Road/Rackstraw area in Sandhurst. It is considered that any competently produced survey should have taken cognisance of this key traffic bottleneck.
- 7.4) It is considered that any competent traffic survey produced for a planning application (particularly one which does not feature within BFC's Local Plan) should make allowance for sites that are currently under construction, have planning permission and/or have been identified within the Council's Local Plan. As previously noted the Bloor traffic assessment seems to taken little or

no regard of the increase in traffic from these developments. This together with the summer timing for the basis of the assessment and the potential under estimate of car trips to and from the site leads to the conclusion that the applicant's future traffic assessments woefully low.

- 7.5) To assess the true impact of traffic congestion within Yorktown Road it is considered that all of the additional exigencies noted above should be included to form a realistic future traffic projection. From one who uses the Yorktown Road on a regular basis I feel there can be only one conclusion and that is a gridlock /near gridlock situation between the Sandhurst centre and the A3095 junction on the Yorktown Road at peak times if a reasonable assessment of the applicant site vehicles are included.

Based on the above I feel that the Bloor traffic assessments fall considerably short of what is likely to transpire and as a consequence in their current form their conclusions cannot be relied upon.

8 Sustainable Alternative Natural Greenspace (SANGS)

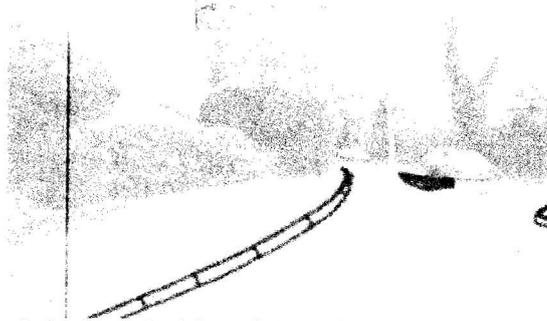
- 8.1) The applicant indicated that the development would open up land to the north of the site for general public access. It is considered that this would be of little benefit to the local community. High Powered electricity cables supported on pylons traverse the area Bloor intend to promote as a SANG. Below the proposed SANG there runs a major high pressure gas distribution pipeline. Much of the SANG also has a very high water table and as a consequence much of the associated land is waterlogged for many months of the year.

Who would want to park their car on a housing estate and then walk under or near high voltage overhead electricity cables and over a high pressure gas main, when there are so many nearby delightful greenspace areas that do not have the impediments of the Bloor SANG proposal, and indeed do not get waterlogged.

- 8.2) Nearby and out of range of the cables there are of course many bridleways within farmland. There are also numerous nearby large public open spaces within Horseshoe Lake, Moor Green Lake, Ambarrow Woods, Simon's Wood and the Ridges. All have adequate car parking provisions and good access to many picturesque walkways and Bridleways.
- 8.3) Opening up of further land to the public located under and near large pylons and high voltage electricity cables/underground high pressure gas mains is therefore not considered of any significant contribution to the community benefit. It will be far better to leave in its current form as farmland.

9 Safety concerns as regards the applicant's proposals for a roundabout access.

- 9.1) The applicant with reference to their drawing 05194A-PA- 002 show proposals for the incorporation of a roundabout on the A321 Wokingham Road adjacent to Maybrick Close. From the roundabout there would be roads leading to the proposed development site and Maybrick Close. With reference to the indicative photographs below it can be seen that the applicant's intension is to replace elements of the current footpaths and grassed verges with the proposed roundabout construction.



The proposed kerb line relating to the roundabout is superimposed on the photograph. The proposed kerb will now be just over 4m from the side of the sun lounge of 2 Maybrick Close. The local amenity of the grass verges will be significantly reduced. On the

right hand side of the photograph the central island and mid road traffic island are shown. Beyond the large hedge and out of sight of southbound traffic there are a number of houses with direct car access from their driveways onto the A321.



The photograph shows the flank wall of 3 Maybrick Close. Superimposed on the photograph are the applicant's proposals for footpaths and roundabout kerb lines.

Should the proposed roundabout be permitted the following safety and disturbance issues are likely to be experienced:-

- i) 2 Maybrick Close will likely experience traffic vibration due to the nearest of the traffic using the roundabout.
- ii) Both 2 and 3 Maybrick Close and indeed nearby houses could well lose the ability to park cars outside of their houses.
- iii) Both 2 and 3 Maybrick Close will suffer noise disturbance due to traffic braking and accelerating when using the roundabout. Accelerating will also increase exhaust fumes.

- iv) Houses to the south of Maybrick Close in the vicinity of the roundabout will not be able to safely drive their cars from their properties onto the A321 as sightlines to south bound traffic will be considerably reduced.
- v) The roundabout would contribute to a slowing of traffic on the A321. It should be noted that this road forms part of a current key link between the M3 and M4.

10 Site Flood Risk

- 10.1) With reference to Bloor's flood risk table reference 4.7.5 it would appear that the results infer a low water table. I do not consider this to be correct. I regularly walk the area during the winter and I can assure the reader that the fields towards the bottom of the site do in fact become water logged.

During recent times the local gas company installed replacement mains under the A321 near the junction with Church Road, Their work installing the main was impeded by much water.

It could be that Bloor need to reassess matters.

Conclusions

Housing Needs:-

The application site is **not required** for Bracknell Forest Council to achieve their future housing requirements. The site has not been recommended for inclusion into their Emerging Local Plan and is not included within the current Local Plan.

Rural Character

The application should be refused so that its rural character and visual amenity, with particular reference to the picturesque Blackwater Valley backdrop, can be enjoyed by current and future generations. A massive housing estate on a prominent hillside will assist in destroying the current beautiful Valley vista.

In respect of specific BFC policies I would note my views as follows. It should additionally be noted that the applicant was also warned (prior to their initial application) by BFC's as regard the application being contrary to the Borough's planning policies.

Principle of Development: - I can find nothing within the application papers that in any way should not be determined in accordance with the Development Plan or indeed taking cognisance of the Emerging Local Plan.

Comprehensive Strategy Development Plan: - The applicant's site had previously been put forward for incorporation into BFC's Comprehensive

Local Plan in its part of the “call for sites” exercise. The Borough decided not to progress with the site. There being far more suitable sites within the Borough to achieve housing targets.

BFC have also updated their review of the site within their Emerging Local Plan and in this regard have decided to continue to not recommend the Applicant’s site for inclusion in future Local Plans.

Policy CS1:- This seeks to protect the character and quality of the local landscape and wider countryside. With reference to the foregoing to this letter I feel it reasonable to conclude that the inclusion of 150 dwellings on the prominent Blackwater Valley vista would be contrary to the intentions of CS1.

I also note (with reference to page 58 of the applicant’s initial planning statement) that BFC comment that “Altogether the pre-application submission would be contrary to policy CS1 as the proposal will not protect the character and quality of local landscapes and the wider countryside”. This comment equally applies to the current application.

Policy CS2:- The development is considered contrary to the Council’s policies. It is not sighted on previously developed land. It is not within a defined settlement.

Policy CS9:- The development site would not protect the defined strategic gap within the Borough and would harm the physical and visual separation of the settlements of Little Sandhurst and Yateley. It would not contribute to enhancing the natural and local environment. It would not improve the intrinsic character and beauty of the countryside.

Policy EN1:- The development would result in the destruction of trees and hedgerows. This applies particularly to the west side of the A321. These trees and hedgerows are considered important to retain the rural ambience of the area.

The inclusion of the development would change the rural landscape into one that would appear as urbanised.

The development due to its size would clearly have some impact on local wildlife.

Policy EN8:- The development would not protect the countryside for its own sake. The application site is outside of the defined settlement boundaries and

would adversely affect the character, appearance and function of the land. It would damage its landscape quality.

It should be noted that the development is not required for agriculture or forestry. It is not essential for utility purposes.

It is not a replacement of an existing building.

It does not re-use buildings that are in keeping with the surroundings.

Policy EN20:- The application development is not in appearance or character with the local environment. Its mass would change a rural setting into an urbanised landscape.

The development would destroy hedges and trees to the west of the A321,

The development would lose the open views public views towards Eversley.

Policy H5:-The development would be contrary to Policy H5 (new dwellings outside of settlements) as there is **no need** for the development as it is not required to achieve BFC's housing targets.

I note on page 49 of the applicant's initial planning statement that they were informed by BFC that "the Council is satisfied that it can demonstrate a five year housing land supply such that policies relevant to the supply of housing, should be accorded full weight".

Clearly the application site/dwellings would cause harm to the character of the area.

It would result in environmental damage and inconvenience. It also is of a danger to the public as regards the access concerns noted within the foregoing. These include significant safety concerns relating to the proposed roundabout adjacent to Maybrick Close, the proposed pedestrian crossing of the A321 on the south east corner of the site and increased use of the narrow and restricted footpath on the east side of the Wokingham Road between the Church Road and Yateley Road junctions.

Foot crossing of main railway lines should also not be encouraged.

Thames Valley Heaths Special Protection Area (SPA):-

It is understood that BFC have consulted with Natural England and has formed the view that any net increase in residential development between 400m and 5km straight line distance from the Thames Basin Special Protection Area (SPA) is likely to have a significant effect on the integrity of the SPA. Either alone or in combination with other plans or projects.

The application site is located circa 1.3km from the SPA boundary.

My view is that the application falls considerable short of providing appropriate avoidance and mitigation measures. The site is far too prominent on raised elements of the Blackwater Valley. As noted elsewhere within this letter opening up to the public land below and near high voltage electricity cables and pylons can in no way be considered a significant mitigation.

BFC have previously make the following statement when advising and reviewing the initial application. It is also very relevant and applicable to the current application:-

“The overall sensitivity of the site is considered medium high. This site is considered sensitive to development due to its sloping landform, strong rural character and agricultural setting it provides to the settlement of Sandhurst, the Blackwater Valley and its location extending into the wider countryside towards Bracknell.

The site has a relatively weak relationship with the existing defined settlements edge due again to landform characteristics and distance from it. As set out above the valued features associated specifically with the site are the site’s historic pasture, open ridgeways and relative sense of tranquillity.

Given the site’s landscape characteristics the development would erode the important Blackwater Valley open rolling countryside setting considered to have medium to high sensitivity to development. The sloping landform would provide glimpses of the development of the site therefore exacerbating harm to the Blackwater/Settlement setting”.

I must say that I can only concur with BFC’s comments. With reference to the “before and after” indicative photographs contained within this letter I would say that the development’s impact of the Blackwater Valley scene would be far greater than just glimpses. Indeed during winter periods significant elements of the development would be almost seen in their entirety and in some locations from many miles distant.

Sustainability

It is contended that the application site is far less sustainable than the applicant would lead us to believe. Practical and safe bus stops are remote from the site to encourage walking. There are elements of the A321 with no footpaths to the north of the site. Utilising current unlit footpaths through Ambarrow and/or adjacent to the Wellington College grounds would seem to be impractical for all year use. Much of it length is uneven and indeed it becomes extremely muddy following rainfall.

Key shopping area, doctors, dentists, usable schools, useable bus stops etc. are too remote from the application site to encourage walking. Indeed the reverse is likely to occur with much increased car usage.

To encourage more people and children to use the potentially unsafe narrow footpaths adjacent to the busy A321 Wokingham Road between the Church Road and Yateley Road junctions seems to be inappropriate. This applies particularly to providing a safe busy road crossing for wheel chairs, mobility scooters, push-chairs, pedestrians walking dogs and young children.

There are similar concerns for those using bicycles on the same stretch of the narrow and busy Wokingham Road.

The pedestrian access proposals that involve crossing the busy A321 near St Michael's Church are considered unsafe as indeed is the proposed crossing near Church Road.

Traffic Survey

The applicant's traffic survey appears to be fundamentally flawed and seems to have significantly underestimated traffic impact on nearby road systems. This applies particularly to the Yorktown Road/ Rackstraw area. This particular stretch of road is currently very congested during rush hour periods. Additional traffic from the application site would considerably exacerbate the problem.

Applicant's roundabout access on to the A321 Wokingham Road.

There would be loss of green verge amenity. The Wokingham Road traffic would be moved closer to the initial houses with Maybrick Close such that it cause disturbance due to vibration, increased noise and fumes.

There would be sightline safety issues with cars on driveways to Wokingham Road accessing the A321.

Some houses within Maybrick Close would not be able to park their car(s) outside of their houses.

The proposed roundabout would slow traffic on this busy section of the A321.

Accuracy of the Bloor submission documentation.

From an initial uninitiated first glance of the Bloor submission documentation it would appear that they may have "ticked" many boxes relating to a planning application. However, when checking the detail of what has been submitted it is clear that much of the salient information does not reflect the true circumstances. Indeed my feel is that it is often riddled with incorrect

information and conclusions. One can have the view that it is biased towards Bloor. I would therefore recommend that any professional checking of the Bloor documentation looks below the surface of what has been submitted. If they do so I am sure they will then appreciate the numerous shortfalls within the submission and then come to the conclusion that the application should be refused.

Based on the above facts and observations I would recommend that Bracknell Forest Council refuse the application based on a lack of need, sustainability issues, safety concerns. Please do not allow this application to threaten the current picturesque countryside and Blackwater Valley backdrop that Bracknell has previously fought to protect. There are very few advantages to the community that the application would provide benefit. As noted within the foregoing future housing requirements have been adequately planned in more suitable areas within the Borough. Opening up land to be public below and near high voltage electricity cables and pylons is considered of little benefit when there are so many nearby public footpaths, bridleways, lakes and spaces that are far superior in beauty and enjoyment. Indeed the building of the application site would detract from the current pleasant vistas.

Please therefore refuse this unwanted and unneeded housing development.

Yours faithfully

Ian Booker CEng, MStructE, MICE.