

**Warfield Village Action Group (WVAG) Objection to Planning Application 19/00497/FUL
for 33 Houses on Land North of Herschel Grange, North of Warfield Street
December 2019**

The planning application proposal involves the demolition of one house in order to enable access for the construction of 33 houses, 10 of which would be affordable. The original planning application 18/00650/FUL on this same site for the same number of houses as the current application 19/00479/FUL was refused earlier this year (1 May 2019) by the same Bracknell Forest (BF) Planning Case Officer on the following grounds:

1. Harmful urbanising impact on the character and appearance of the countryside.
2. Failed to demonstrate ...that it would not result in an adverse impact on biodiversity, through its failure to adequately address concerns over the presence of protected species and priority habitats.
3. Failed to demonstrate....that an acceptable surface water drainage mitigation strategy on a Sustainable Drainage System (SuDS) scheme can be achieved.
4. Extra pressure on the Thames Basin Heaths Special Protection Area (SPA) and the proposal would not satisfactorily mitigate its impacts in this respect.
5. Unacceptably increase pressure on local open space, and inability to mitigate its impact on community infrastructure.

The latest planning application, a slightly revised version of the original, has in fact changed very little from the previous application on this same site, except for a small increase in affordable housing from 8 to 10, and seems to have only now been recommended by the Case Officer to avoid the risk of incurring significant costs to the Council, should the case go to Appeal and be accepted. The purported grounds for recommendation in the Case Officer's Committee Report are therefore neither robust nor consistent with existing BF planning evidence:

- The development would conflict with countryside policies in the development plan but the harm is considered to be minor.
- The proposal would not adversely impact upon the character and appearance of the immediate area, nor would it adversely affect the residential amenities of the occupants of neighbouring residential dwellings.
- The proposal would also be acceptable in terms of highway safety and parking, subject to proposed conditions.
- Relevant conditions will be imposed in relation to multiple matters, including surface water drainage and biodiversity.

Indeed, the alleged reasons for recommending this site are inconsistent with all existing BF planning evidence and in stark contrast to the reasons given only 6 months previously, by the very same Case Officer, for refusal of what is effectively the same application proposal on exactly the same site, despite his confirmation that the first three reasons given for refusal were 'fundamental' so unlikely to be surmounted. This is effectively reconfirmed in his Committee Report: 'The proposal for building houses and flats on a primarily greenfield site would conflict with the Council's countryside policies. Giving those appropriate weight, as

described above, the proposal is not considered acceptable in principle. This means that the application should be refused unless material conditions indicate otherwise' (9.12).

Planning grounds to support the Refusal Recommendation for the latest planning application made on 27 June 2019 by Warfield Parish Council, who know and understand local reality, residents and needs, should be heeded by BFC and Planning Councillors to ensure that planning permission is not granted for this site:

1. Outside of the defined settlement area;
2. Overdevelopment of the site and out of keeping with the area;
3. Concerns regarding increasing traffic levels across the local area resulting from the proposal combined with the extant permission for housing north of Newhurst Gardens, and the impact this would have on highways safety;
4. Urbanisation of defined Character Area;
5. Adversely impact local open space.

Also to be considered in deciding whether to accept or refuse the application is the Warfield Neighbourhood Plan as it nears Adoption stage. This states that development proposals outside defined settlement boundary to the north of Warfield Street will only be supported if they are 'appropriate forms of development and they are consistent with development plan policies relating to the historic environment, heritage assets, landscape character, protecting the natural environment and where they will not compromise the delivery of the green infrastructure network'. The Herschel Grange planning application would fail to meet these criteria.

Most importantly, Bracknell Forest does not need this greenfield, not previously developed, countryside application site, as, even without it, it has succeeded in demonstrating a Housing Land Supply (HLS) of over 6 Years, so well in excess of the Government's 5 Year HLS Requirement, and with a 'robust HLS buffer', as confirmed by Max Baker, BF Head of Planning. The BFC's 5 Year HLS was confirmed by the Inspector as a reason for refusal of the recent Appeal APP/R0335/W/18/3217574 for Scotlands House, another Warfield site to the north of Warfield Street/Forest Road. The recent significant drop in Housing Land Need (HLN), or the number of houses required, in the Borough is stated in the Introduction to the Draft BFLP as one of the key strands behind the BF Revised Growth Strategy.

The selection or allocation of the application site (WAR9) as a 'preferred' site for potential development in the Draft BF Local Plan (BFLP) does not accord with the declared objectives set out at the beginning of the Draft BFLP: 'to ensure that the Borough's valued natural and historic environment is properly protected, enhanced, supplemented and managed as appropriate to its significance; such as, countryside, landscapes, open spaces, community facilities, heritage assets (including their setting), water, air and soil environments, and areas of nature conservation/ecological value (including Habitats Sites).'

Indeed, the SHELAA identified around 100 potential sites for development within the Borough, including many other arguably more suitable sites than WAR9. In the evidence used by BF to support its selection of 'preferred' sites, there appear to have been

inconsistencies relating to the way certain criteria were applied to 'preferred' and 'omitted' sites. There are a number of sites, which have been 'omitted' from the Draft BFLP on the grounds of lying north of the Warfield Street/Forest Road 'divide' and/or protruding into countryside to the north eg WAR8. Yet, while both of these criteria also applied to WAR9 (and also the adjacent field WAR10, the Newhurst Gardens appeal site), WAR9 and WAR10 were both unexplainably classified as 'preferred' sites. Furthermore, there were over 70 potential SHELAA sites 'omitted' from inclusion in the first draft of the BFLP, many of which would better meet the National Planning Policy Framework (NPPF) requirement for development, as they are within settlement and/or brownfield sites ie Previously Developed Land (PDL), as well as a number of 'windfall' sites, some of which are also PDL sites. According to the NPPF, these sites should automatically be 'preferred' over the allocation of greenfield sites or countryside sites not previously developed like WAR9 and WAR10. Since there are PDL sites which have either been 'omitted' or even removed from the Draft LP, the continued inclusion of WAR9, a greenfield not previously developed site outside settlement boundary and within protected land north of Warfield Street, in the latest Draft BFLP, as well as its current consideration as a planning application site, is not consistent with the NPPF priority to exhaust urban and brownfield sites first.

The Draft BF Local Plan is still no more than a Draft or emerging plan and therefore can be given no weight in any current planning decisions made, meaning that in determining the Herschel Grange planning application, only existing Development Plans and policies apply. Indeed, a final BF Local Plan is not scheduled for Adoption until January 2021 at the earliest.

Under the current BFC Development Plan, countryside to the north of Warfield Street is protected from further development, so to develop this greenfield site which is not previously developed land, is countryside outside existing settlement boundary, and is designated by BFC as an Area of Character, not only fails to accord with the NPPF but is inconsistent with existing and longstanding BFC evidence, designed to preserve the rural character and landscape to the north of Warfield Street. Indeed, it is not one of the sites designated for development in the existing and current BFC Development Plan and, according to the NPPF, should only ever be considered for use as building land, once all urban or sites within settlement and brownfield or PDL sites have been exhausted, which is not currently the case in BF Borough.

Development on this site would also be inconsistent with the requirement to maintain a gap of a field's width between settlement and green belt ie 'the important green space function' highlighted in the Site Allocation Proforma for the application site in the Draft BFLP. The Landscape Sensitivity Appraisal for the BF Local Plan also confirms that, if developed, this site would 'extend the built form a little further north into countryside than the current settlement edge'. Listed in the same document for this site are 'some features and characteristics that are valued in the Bracknell Landscape Character Assessment' and may be 'at risk if the site were to be developed indicating some sensitivity in terms of valued features' including: 'Clusters of trees which help to soften the boundary between adjacent urban areas providing a visual buffer between the northern edge of Bracknell and the rural farmed landscape; hedgerows and hedgerow standard oak trees; the open and rural

character of the landscape which provides a rural buffer to the settlement; the quiet and rural character and sense of openness including the rural character of the villages'.

Warfield has already delivered a major proportion of the Borough's current HLS capacity, including 2,200 houses already planned and partially delivered to the south of Warfield Street, plus the Newhurst Gardens site for 50 houses to the north. Further development and exploitation therefore of the small unique character village of Warfield Street, with a mere 100 dwellings, is not only unreasonable, but represents unacceptable and irresponsible overdevelopment.

Given that the Herschel Grange application is for Full planning permission, as opposed to Outline planning permission, the proposed site layout is also an important consideration in the application decision. As recognised by the Warfield Parish Council in its objection to the original planning application 18/00650/FUL last year on the same site, the proposed high density development, including 3-storey buildings, is utterly out of keeping with the rural surrounds and the character, density and form of the existing village settlement, and the latest proposal 19/00497/FUL is no different.

The proposed housing density of the application site, as shown in the Amended Site Plan (see below), together with the size, scale and height of 'various plots' along the eastern side of the site, including an apartment block in the southeastern corner, is excessive, inappropriate and out of keeping with the surrounding semi-rural area of character and open countryside. Certain buildings, including the apartment block, are claimed by the applicant to be 2.5 storeys with 'loft space accommodation', which means in effect three storeys. Furthermore, the close proximity of houses, including the 3-storey apartment block, to the site boundary directly abutting existing properties in Herschel Grange and Toogood Place, is completely unacceptable and breaches all existing BF policy, evidence and support documents. Indeed, the Character Area Assessment requires that, where proposed dwellings adjoin the boundary of existing dwellings, the proposed gardens should be at least of an equal length and distance. The implications of such proximity, especially for residents in existing properties 2, 3 and 4 Toogood Place, which do not benefit from longer gardens, are such that they will inevitably be overlooked and deprived of their right to privacy. Unacceptable, too, will be the proximity of proposed dwellings along the western site boundary with The Hermitage Mobile Home Park, where existing mobile bungalows will be overlooked by a minimum of 2-storey housing.

As admitted in the BF Committee Report, the proposal would impact adversely on the character of the area as it 'would be a clearly suburban form of development by virtue of its density, scale and design' and 'would change the semi-rural character of the existing site' (9.36). To permit the applicant 'to seek to achieve' their 'own architectural style' for the site (9.27) would be in breach of the NPPF and all existing BFC planning evidence, as it is inconsistent with the aim to remain in keeping with the semi-rural character of the village and the countryside surroundings.

As is evident from the above Amended Plan, the proposed layout allows for neither green space nor hedgerow space and, with its unacceptable proximity of proposed dwellings to the site boundary, also means that the necessary 'wildlife corridor' is reduced to a mere hedge. Moreover, there is no proper allowance made to 'protect and enhance' biodiversity or to 'retain and reinforce' planting, including the beautiful large mature oak trees on this site or similar trees directly adjacent and bordering the site, including a number of trees with Tree Protection Orders (TPOs) in existing adjacent properties of Toogood Place.

Immediately following validation of the replacement planning application 19/00497/FUL for the Herschel Grange site, one such healthy mature oak tree on the application site was quickly felled on 6 June 2019 - clearly to make way for proposed housing on this site (see photos below captured by a neighbour). BF Council were advised and appeared to take no action, claiming that, while this action may not be recommended, the tree had no Tree Protection Order (TPO) so there was little they could do, even though the felling of the tree on the application site was clearly within the design of the Planning Application 19/00497/FUL, already submitted and validated, and was contrary to NPPF requirements. The Council's seemingly evasive, irresponsible stance on this issue is also reflected in the Committee Report under Landscaping and Trees, which incorrectly claims that 'No trees within the site or on its immediate boundary are subject to Tree Preservation Orders (TPOs). The Tree Officer has no comment to make in view of this.' (9.32). With global recognition of the increasing catastrophic consequences of climate change caused by greenhouse gases, namely carbon dioxide generated by man, being trapped in the Earth's atmosphere, the practice of randomly felling mature healthy trees, which not only support wildlife and add to the intrinsic beauty of nature, but absorb carbon dioxide and produce oxygen the world so desperately needs, is mercenary, irresponsible, anti-social and criminal.





Beautiful large, healthy, mature oak tree felled on Herschel Grange Application countryside site on 6 June 2019



The felled mature oak tree clearly a perfectly healthy specimen



Tree surgeons depart via Herschel Grange

Biodiversity would be significantly threatened by development of the above site, which currently benefits from the natural variety of life and different habitats, including long, mature hedgerows, a UK Priority Habitat supporting nesting birds and a range of UK Priority Species; as well as grassland, several scattered large mature oak trees and dense scrub, supporting birds, bats and reptiles and forming part of the grassland and woodland habitat networks, which not only help provide the all-important connectivity for wildlife, but which must be preserved now more than ever, given the reality of increasing climate change, which has become, nationally and globally, the highest priority for the survival of all natural life.

As evidenced from the above tree felling, the Committee Report claim that the aim of the planning application 'to retain the majority of the existing trees that are present on the northern and southern boundaries' would 'accord with the recommendations of the Character Area Assessments SPD which states that new developments should retain and reinforce tree and hedgerow planting' (9.34) is clearly not true. The immediate harm to biodiversity and wildlife represented by development of the application site - and hence the responsibility towards protection and enhancement of biodiversity and wildlife habitats - is even greater, given the planning permission already granted on the immediately adjacent greenfield site, north of Newhurst Gardens, for 50 houses, in order to provide the fundamental continuity of habitat for the displaced wildlife from the adjacent site.

Since the application site falls within the Zone of Influence ie it is within 5km of the Thames Basin Heaths Special Protection Area (SPA), where critical birdlife must be preserved, its development could potentially threaten the integrity of the SPA and protected species within it. Under EU Law (which will still be in force in the UK post-Brexit), proposed development of this site for more than one dwelling would be refused, unless it can be proved through an Appropriate Assessment that the development will cause no harm to the SPA. Due to a recent European Case Law (People over Wind in Ireland), it should no longer be deemed sufficient for potential harm to habitats to be mitigated through financial contributions to 'Suitable Alternative Natural Greenspace' (SANG) or the SPA, so this European Requirement should be respected by BFC and BF Planning Councillors in their decision making and recommendations made.

As already stated, the proposed scale and housing density of the planning application is out of keeping with the surrounding countryside and semi-rural Warfield Street village, linear in form and characterised by well spaced, varied character houses, bungalows and cottages, as well as older heritage buildings. Site development on this scale, together with the volume of extra traffic generated, would undermine the unique character and heritage of Warfield Street, designated by BF as an Area of Character with its rural village aspect; countryside; stables and farms; horse riding and absence of both street lighting and urbanisation; and historical, medieval and archaeological interest, including a higher than average proportion of Grade II English Heritage Listed Buildings. Not fully appreciated in the Committee Report is the extent of heritage sites along Warfield Street - including Newell Hall, Priory Cottage, Horseshoe House, Wee Knibbs, Knibbs Nook, Pear Tree Cottage and Lane End Cottage - as well as others sited throughout the village just off Warfield Street, all of which would be further and irretrievably damaged through harm to setting, harm to their significance as heritage sites, and harm to their very fabric through increased and unacceptable levels of pollution from the significant increase in traffic generated by two prospective and disproportionately large housing developments to the north of Warfield Street.

In addition, BF Historic Environment Assessment of the application site (WAR9) highlights the damage that would be caused to the potential prehistoric, Roman, medieval and post-medieval landscape significance of the site and its external hedgerows: 'Development may harm this through alteration of local historic landscape character'.



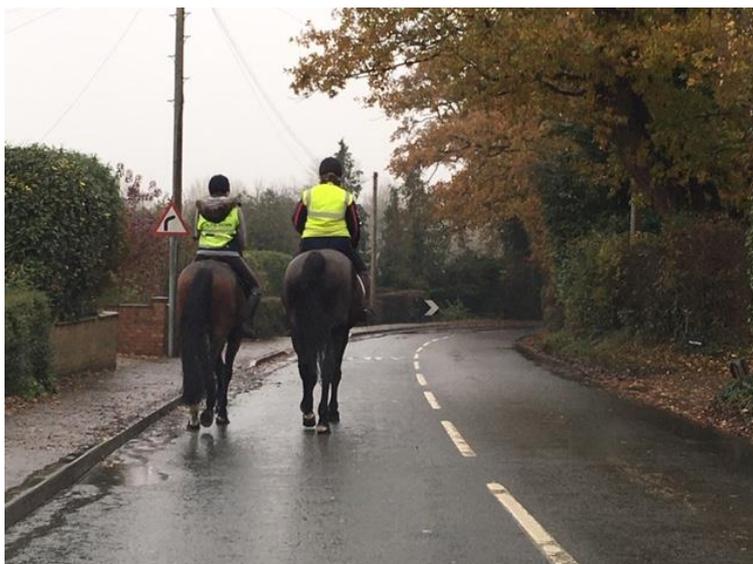
Heritage Assets on Warfield Street include Wee Knibbs, Knibbs Nook, Pear Tree and Lane End Cottages

The 'horsiculture' heritage and culture of Warfield Street dates back to the Domesday Book in 1086, where Warfield Street is mentioned as a route used by highwaymen. In the 17th Century, it formed an old drover's road, along which cattle were herded by men and horses and watered at the pond opposite the Priory (at today's Old Priory Lane junction with Warfield Street), diagonally opposite Gibbins Lane. In the 18th/19th Centuries, two public houses were trading on Warfield Street, both bearing distinctly 'horsiculture'-related names: The Plough and Harrow and The Four Horse Shoes, the former still trading under the same name at the crossroads junction at the western end of Warfield Street, and the latter now a residential Grade II Listed Building, Horseshoe House, located directly at the Herschel Grange junction onto Warfield Street, also the access from the application site onto Warfield Street. In the Site Allocation Proforma evidence, potential damage to

Horseshoe House has not been acknowledged, and yet its character, setting, environment and very fabric would undoubtedly be harmed by the almost trebling of traffic and pollution damage that would be generated by an increase of 33 dwellings along Herschel Grange, meaning harm to its significance as a listed building.



Horseshoe House. Grade II Listed Building, located on Herschel Grange junction with Warfield Street



With several stables still dotted around the village, including on Gibbins Lane next to the application site, horses continue to be a very visible and integral part of the character and everyday life of Warfield Street village. As confirmed in the Committee Report, 'the site appears to have had historic equestrian use, its current use is as horse grazing and it was historically known as The Hermitage.' In its consideration of this planning application, Councillors surely have a duty and care to preserve and protect the rural and historical 'horsiculture' character, culture and tradition of Warfield Street still very much in evidence today, as well as the wellbeing and safety of its horse riders.



Horses grazing on Herschel Grange application site



The Herschel Grange planning application proposal for vehicular access onto Warfield Street undermines all existing BFC planning evidence and policy designed to prevent additional traffic from accessing Warfield Street, in order to safeguard its unique village character, regulate the already excessive volume of traffic and protect highways safety. Harvest Ride,

running parallel to Warfield Street to the south, was originally designed to alleviate the traffic on Warfield Street. A further initiative in support of this policy was the retention of traffic bollards on Maize Lane and the blocking of Old Priory Lane, to prevent further outflow of traffic onto Warfield Street. So to accept the above planning application would be to significantly add to existing already excessive levels of traffic along Warfield Street and would be in breach of the current BFC Development Plan.

The safety of all road users will be significantly and unacceptably threatened by the proposed access onto Warfield Street of such a high level of extra traffic movements that a development of this size will generate. This is further increased, given the already planned Newhurst Gardens site for 50 houses with access onto Warfield Street, and the planned and only as yet partially delivered 2,200 houses to the immediate south. The intrinsic village nature and characteristics of Warfield Street, essentially a narrow winding country lane, make a further planning proposal even more absurd and a recipe for disaster. Potentially dangerous aspects include complex junctions at either end of Warfield Street; excessive levels of traffic already, including heavy through-traffic (see photo); serious blind bends; several dangerous junctions and driveways with poor visibility; on-road parking (due to cottages fronting onto street) sometimes meaning less pavement space; residents reversing out of tiny driveways; higher than average proportion of non-vehicular road users, including horse riders, cyclists and pedestrians, many of whom are elderly, and all of whom are especially vulnerable, as has been evidenced by serious accidents over the last few years involving vehicles and horse riders (see Thames Valley Police Notice below).

The unusually high level of road safety risks combine to mean that Warfield Street is not in a position to safely and readily cope with the hundreds of proposed extra vehicular movements a day that two additional housing developments to the north of Warfield Street will generate. Moreover, given the actual unsustainability of both sites, the Herschel Grange proposal is likely to generate considerably more traffic than currently predicted by traffic models and the real impact appears not to have been fully considered at this stage. The BF Committee Report assertion that 'the development would not result in an adverse impact on highway safety' (9.69) is not justifiable and is therefore irresponsible.





Warfield Street: Another horse rider accident waiting to happen due to blind bends and excessive traffic.



Warfield Street: Listed buildings, parked cars, junctions, blind bends, excessive traffic - a recipe for disaster.



Dangerous Five Ways Junction at east end of busy Warfield Street.



Heavy duty lorry on small village Warfield Street!



Neither the application site nor the adjacent appeal site, Newhurst Gardens, are currently sustainable, so the current applicant's claim that: 'The site fares well in the Sustainability Appraisal in terms of access to services, such that there should be no harm in terms of this issue' is unjustified and unjustifiable. Similarly, the assertion in the Committee Report that the Newhurst Gardens Inspector confirmed that 'the site is sustainably located' (9.65) is incorrect, as in fact he concluded that 'there would be some harm in terms of access to services.' (1.21). He also admitted that it is 'contrary to the Development Plan' and refers to 'the current unsustainability of the site's location' as well as 'the moderate harm to the character and appearance of the area.'

A further statement made in the current application that, 'The Warfield development will provide additional facilities and services within the next 5 years', with reference to the planned development, SA9, to the south of Warfield Street, should carry no weight in the consideration and weighing in the balance of this application, since a possible future event does not provide a robust or accepted planning ground, on which to base the recommendation of a site for housing. The proposed amenities to the south are simply proposals; they do not currently exist and are by no means certain and therefore bear absolutely no relevance to this planning application.

It should be remembered that the adjacent Newhurst Gardens site application was rejected unanimously at the Planning Committee Meeting by all voting Councillors on three fundamental grounds:

- a) Outside settlement boundary;
- b) Out of character; and
- c) Unsustainable;

and nothing has changed in these three site characteristics since that judgment in February 2017. One significant planning change, however, is the decrease in HLN and the significant increase in, and excess of, HLS in the Borough, meaning that such a small countryside site outside settlement boundary is not actually required for development and so clearly should not be even considered.

The suggestion in the Herschel Grange planning application that a 'cycle and pedestrian linkage' to the Newhurst Gardens site might 'potentially reduce car trips' has no justification whatsoever, as both sites are currently unsustainable and remain outside reasonable walking distance of local amenities eg shops, schools and medical centre. Moreover, existing public services along Warfield Street are inadequate, infrequent, irregular and unreliable, and even non-existent on Sundays, so the use of the private car by prospective residents will be inevitable and thus, significantly more traffic will be generated along Warfield Street than is currently predicted. Alleged 'improvements' to footpaths and public transport, proposed by the Council in the site Committee Report document, are nowhere near sufficient to make these two sites to the north of Warfield Street sustainable.



Inadequate bus service on Warfield Street: Bus Stop Suspension notice: 4-8 February 2019: 0900-1600 daily.

The unsustainability of the site does not stop there, as acknowledged by the Committee Report under Drainage Implications. Surface water flooding is already a key issue in the area and will continue to increase as a consequence of climate change. As stated in the Council's Sustainability Assessment, the application site is at risk of flooding from the nearby waterways, the River Cut and the Bull Brook, as well as the rising water table, so is not a suitable site for the proposed level of development. Indeed, areas of the site are at times waterlogged, as also confirmed by the Environment Agency, and Warfield Street itself is frequently flooded in different places along its length and for extensive periods of time throughout the year, meaning further ice in the winter.





Warfield Street: Risks include traffic, horses, pedestrians, blind bends, junctions, ice warning.

In addition, inadequate water supply and waste water systems are already stretched and not able to cope with existing housing, as evidenced by frequently occurring burst pipes and further flooding on Warfield Street and pavements. In Newell Green in early November 2018, there was a burst water main, causing loss of running water into many homes in the Warfield Street area, plus a gigantic hole to form in the road, so the road had to be closed for several days, making it unsafe and inconvenient for local residents (see attached email below of 8 November 2018 from the Warfield Church Vicar alerting Church members to the situation).



Dangers of Warfield Steet include traffic, junctions, horses, flood water, water works (visible in the distance).



A frequent site along the length of Warfield Street.

Due to climate change, flooding and environmental issues are set to get worse, as confirmed by the Draft Local Plan under Flooding and Drainage: 'The Climate Change Act 2008 demonstrates that climate change is a national policy priority. One of the major impacts of a changing climate is increased flooding. Flood risk is a combination of the probability and potential consequences of flooding from all sources including rivers, seas, rainfall, rising ground waters, sewers and drainage systems exceeding capacity. New development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.' (9.37).

When considering this application, the appeal decision to accept the Newhurst Gardens site, though adjacent to the application site and also on land north of Warfield Street, should carry no weight, because the circumstances at the time of the appeal hearing and the Inspector's decision (March 2018) were very different to the current situation, especially in terms of the BF HLS. At that time, the appeal Inspector had little choice but to accept the appeal site for development as then, with only a 4.1 Year HLS, BFC was unable to demonstrate the critical 5 Year HLS Requirement, whereas now, with over 6 Years, there is no HLS shortage; indeed, BF Head of Planning, Max Baker, recently confirmed an additional 'robust buffer'.

In addition, while both sites share similarities, they are not the same and so have different characteristics, which need to be taken into account. The Herschel Grange application site, also a field in countryside, is sited alongside Gibbins Lane, a no-through lane/public footpath off Warfield Street, which almost directly abuts the application site to the west. The claim in the BF Committee Report that the site 'is visually enclosed by development to the south and west' (9.18) is not absolutely true, as the western side of the application site is visible from Gibbins Lane, where there is no housing development. Furthermore, the proposed housing development, currently an open field, directly abutting The Hermitage Mobile Home Park, will not only be clearly visible from the adjacent Park, but will also be extensively visible, through the demolition of 6 Herschel Grange and the widened site access, from, and will adversely impact the character of, Herschel Grange, and very likely Warfield Street too.

As the Committee Report confirms, the current use of the application site is for 'horse grazing' so, as well as adversely affecting the appearance and character of the site and its rural and semi-rural village surroundings, the proposal would significantly harm its existing function in supporting the important local 'horsiculture'.

In further consideration of the Herschel Grange application site, it is important to understand that the initial Draft BF Local Plan, unexpectedly published the day prior to the appeal hearing of the Newhurst Gardens site, the adjacent field to the Herschel Grange field, and was immediately taken into consideration by the Appeal Inspector during the appeal proceedings, whereas, as a Draft Plan, it should in fact carry no weight. The relevance of the last minute production of the Draft BF Local Plan was that the Newhurst Gardens appeal site, WAR10, and the current application site, WAR9 - both improbable and relatively small countryside sites outside settlement boundary - were allocated as two out of only 20 'preferred' sites for development out of a possible 100 SHELAA sites which included urban and brownfield sites which were not selected for potential development. The Newhurst Gardens appeal hearing on 16 January 2018 was even interrupted, in order for the 'hot off the press' Draft BF Local Plan to be brought to the Inspector's attention by the applicant's legal team, as the document was not familiar to either the Inspector or to attendees of the hearing (excluding the applicant's team).

In determining whether to accept or refuse the proposed site for development, consideration should also be given to other recent local planning applications and appeals with similar site and proposal characteristics to the Herschel Grange application (listed below), all of which have been refused by the Council or Inspector, even at times when BFC was not able to demonstrate a 5 year HLS - whereas now BFC is able to demonstrate a surplus HLS with a 'robust buffer':

- APP/R0335/W/18/3217574 - Appeal for 12 dwellings at Scotlands House site dismissed on 6/11/19 on grounds of impact on character and appearance of the area; BF can demonstrate 5 Year HLS.
- 19/00075/OUT - 197 dwellings on land west of Home Farm - refused on 10/10/19 on grounds of outside defined settlement within open countryside; unsustainable location; harmful urbanising impact; harm to setting and significance of listed building; fails to demonstrate safe/suitable access and protection/enhancement of biodiversity or assessment of impact on buried archaeological heritage; extra pressure on Thames Basin Heaths SPA; unacceptable pressure on highways and transport infrastructure, public open space, etc.
- 19/00229/FUL - 67 dwellings on land south of Foxley Lane, Binfield - refused on 4/7/19 on grounds of poor visibility to the detriment of highway safety for all users.
- 18/00765/FUL - 9 dwellings on Tilehurst Lane, Binfield - refused on 10/6/19 on grounds of harmful urbanising impact on character and appearance of countryside; harm to setting of neighbouring Grade II listed buildings; fails to demonstrate acceptable surface water drainage mitigation and that there would not be an adverse impact on biodiversity and breeding birds, which are of principle importance for conservation; need for a sustainable drainage system; pressure on local open space and community facilities.

- 18/00655/OUT - 68 dwellings at Beaufort Park, South Road, Wokingham - refused on 17/10/18.
- 18/00047/FUL - 12 dwellings at Scotlands House, Forest Road, Warfield - refused on 12/10/18 on grounds of harmful urbanising impact on character and appearance of the site and out of keeping with existing character of settlement; pressure on open local space, public footpath on the site, and local cycle network.
- 16/01196/OUT - 350 dwellings + amenities south of Foxley Lane, Binfield - Appeal refused in February 2018 due to impact on character, local roads, green buffer and air quality, plus concern due to its potential unsustainability.
- 15/01176/OUT - 75 dwellings west of Locks Ride, Winkfield - refused in April 2016 on grounds of unsustainability, out of character, danger to highways safety and pressure on Thames Basin Heaths Special Protection Area (SPA).

Conclusion

This Bracknell Forest designated Area of Character, the unique National Heritage 'horsiculture' village of Warfield Street with its beautiful undeveloped countryside to the north, must continue to be preserved in accordance with the current BFC Development Plan and all existing BF planning evidence - and thus protected from further unnecessary erosion by another housing development outside settlement together with the additional traffic that it will generate - or its intrinsic character, countryside, wildlife and traditions may be lost forever.

Now that BFC is able to demonstrate a substantial HLS, with a 'robust buffer', the development of the application site is surplus to requirement, plus there are other urban and brownfield sites in the Borough to be exhausted first in accordance with the NPPF, where harm caused by development would be significantly less. Continued unnecessary exploitation of our greenfield sites and rural landscape of trees, hedgerows, fields and grassland, enriched with wildlife and natural biodiversity, must stop now, in order to preserve all life, to survive the inevitable consequences of climate change, while also actively aiming to reduce it. BFC and Planning Councillors, therefore, bear a responsibility, not just to meet local present-day and short-term future needs, but to the environmental consequences and any precedent they may be setting for future planning decisions, in order to prevent further unnecessary erosion of greenfield countryside and loss of natural habitats and wildlife.

Only in May this year was a previous planning application for the same number of houses on the same site refused on the fundamental grounds of damage to countryside, biodiversity, protected species and priority habitats, green open space, surface water drainage and community infrastructure. None of these can be addressed in 6 months, so the assertion made in the latest Committee Report for this very similar, if not effectively the same application proposal, that the harm 'to the intrinsic value and beauty of the countryside, and to the semi-rural character of the site' would be 'minor' is inconsistent and unjustifiable. Similarly, the statement that the proposed development 'would not result in material harm to highway safety, biodiversity or drainage' is an untrue and irresponsible claim.

The decision now for the Council and Councillors is to weigh in the balance the BF identified 'harm to the intrinsic value and beauty of the countryside, and to the semi-rural character of the site' against the BF identified benefits of 'an above policy-compliant level of affordable housing, and the provision of housing generally'.

Taking all into account, the development of this uniquely located application site ultimately means irretrievable damage to countryside, climate, character and community, which far outweighs any potential benefit of generating surplus Housing Land Supply. For this reason, the Warfield Village Action Group respectfully requests that Bracknell Forest Council and Bracknell Forest Planning Councillors reject Planning Application 19/00497/FUL.

Thank you.

Please see attached documents below:



To whom it may concern,

Regarding the injury collision that occurred on 11th March 2016 at 16.30 hours, Police Reference URN 1213 of 11/03/2016 / 43/SW/100/03/16 involving a horse rider being thrown from her horse. I would like to confirm that the correct location should have been recorded as the B3034 Warfield Street near the junction with Newhurst Gardens and NOT Warfield Street near the junction with Old Priory Lane as initially recorded in the Police Report. The Police report has now been updated with the correct location.

Please do not hesitate to contact me should you wish to clarify anything .

PC144 Phil Martin

A handwritten signature in black ink, appearing to read 'Phil Martin'.

Officer In Case

Roads Policing Unit

Taplow

Thames Valley Police

07800703121 OR 101.

