

## **A Local Resident's Consultation Submission opposing Jealott's Hill Development**

*Below is an example of an objection letter to Bracknell Forest Council, together with the case which sets out why this raid on the Green Belt should not be allowed:*

The Council is attempting to argue there are "exceptional circumstances" to make changes to the Green Belt boundary due to "the national and international importance of the agricultural technology work carried out by Syngenta, along with the proposed boost in housing supply and employment, that provide the exceptional circumstances necessary to justify the proposed changes to the Green Belt boundary."

For the reasons detailed overleaf, it is inappropriate to argue that the harm caused by the proposed excessive removal of Green Belt area & habitats is clearly outweighed by other considerations. I believe this proposal clearly contravenes the definition of "exceptional circumstances."

I therefore submit that no amendment should be made to the existing boundaries of the designated Green Belt around Jealott's Hill, Hawthorn Hill, Moss End and Warfield. I also submit that consequently, the entire development plan must be rejected.

I also question why a private, for-profit company's agenda for releasing circa. £500m of liquidity from land assets for shareholder gain is the primary argument being used for the unjustifiable removal of Green Belt Land. The Council's secondary arguments of "along with [a] boost in housing supply and employment" in normal circumstances would be the primary and only arguments involved, and even their current disproportionate scope does not "clearly outweigh" the harm to the Green Belt.

I look forward to the Council's response.

(Resident's name)

### **1) Inappropriate Use Of "Exceptional Circumstances" For Amending Boundaries & Removing Green Belt Land**

For reference, Paragraph 136 of the current NPPF states:

*"Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans."*

#### **1. (A) None of the arguments offered as "exceptional circumstances" are "fully evidenced" or "justified":**

For reference, the Council's definition of "exceptional circumstances" is as follows:

*"the national and international importance of the agricultural technology work carried out by Syngenta, along with the proposed boost in housing supply and employment,*

*that provide the exceptional circumstances necessary to justify the proposed changes to the Green Belt boundary.”*

Reason 1 (Primary) – *“the national and international importance of the agricultural technology work carried out by Syngenta”*

- Reasonable review of Syngenta’s most recent financial filings (<https://www.syngenta.com/~media/Files/S/Syngenta/2019/Financial%20Report%202018.pdf>) indicate the company’s future financial stability is unsure and its operating income has been in decline.
- There have been no plans shown by the Council in the event that Syngenta – a private for-profit company – deems the Jealott’s Hill site no longer profitable and withdraws from the area.
- There have been no plans shown by the Council in the event that Syngenta – a private for-profit company – enters financial difficulty and withdraws from the area.
- There have been no reports quantifying the “national and international importance” of the private company’s output to Bracknell Forest.

Reason 2 – *“the proposed boost in housing supply”*

- BFC’s 2036 housing plans require 1,877 new homes to be built for the Local Housing Need. All 1,877 builds have already been accounted for in the 2036 plans without the need for the Jealott’s Hill development. The 4,000 additional proposed houses are entirely surplus and unnecessary.
- Paragraph 137 of the NPPF states: *“Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.”* BFC has already identified sufficient alternatives to meet the Local Housing Need, therefore this plan is unjustified.

Reason 3 – *“the proposed boost [in] employment”*

- There have been no guarantees from Syngenta or the Council that any new job creation is secured and will definitely occur directly as a result of the development.
- There have been no guarantees from Syngenta or the Council that any new job creation will occur immediately after the first phase of development is completed.
- There have been no guarantees from Syngenta or the Council that any new job creation at Syngenta will cause income to remain inside the Borough or that Syngenta employees will live on the development site.
- There have been no assessments shown by the Council of the number and type of jobs that will be created as a direct result of the development.
- There have been no assessments shown by the Council that the income from any new job creation will outweigh the loss of Green Belt land and environmental cost of the development.
- Syngenta intends to reduce the square metres it uses after development has taken place – therefore if the private company is able to reduce square metres required while increasing the number of jobs on the site then no additional development is required on the site and the Green Belt boundaries do not need to be removed.

- Any new development would suffer from brain drain and competitive pressure from the larger employment market in Bracknell Town.

**1. (B) The proposed plans contravene all 5 of the purposes of Green Belt designated land:**

**Purpose 1 – Safeguarding The Countryside Against Encroachment**

- The development would be separate (3+ miles) from the existing settlement edge of Bracknell town meaning it will be classed as an entirely new settlement created inside the Green Belt.
- The dramatic increase in traffic would have an urbanising effect on the rural environment.
- There are no rail links in the immediate walkable area. Jealott's Hill is 3.2 miles from Bracknell station and 5.7 miles from Maidenhead station. There is only one bus route (53) that goes only once per hour down Maidenhead Road past Jealott's Hill. For reasonable freedom of movement, 4,000 homes would therefore be reliant upon at least one car per household, with the average family using two cars per household. 8,000+ additional cars is an unreasonable increase in traffic on local infrastructure.
- Maidenhead Road & the A330 are together the primary artery connecting Bracknell and Maidenhead. While the Council has provided little detail around the "upgrades" proposed to Maidenhead Road and 3 access junctions, there are no planned upgrades to Bowyers Lane or Wellers Lane which would be two of the three entrances to and roads through the site.

**Purpose 2 – Restricting Sprawl**

- The proposed development size is 240+ hectares. The current Syngenta site occupies approximately 25 hectares. This is a 960% increase in the area of developed land.

**Purpose 3 – Preventing Merging**

- The development would merge Jealott's Hill, Hawthorn Hill and Moss End removing the rural setting for all three historical settlements.

**Purpose 4 – Preserving The Setting And Character Of Historic Towns**

- Archaeological heritage assets are likely to be present across all areas of the site that would be disturbed and/or destroyed by development.
- Jealott's Farm includes Grade II listed buildings that would lose their agricultural setting and suffer damage.
- Hawthorndale House is proposed for Local Listen and would lose its rural setting.
- Cruchfield Manor, Grade II listed, would lose its agricultural setting.
- Nuptown House, Grade II listed, would lose its agricultural setting.
- The age and natural development of hedgerows in the site means they should be regarded as heritage assets.
- Warfield Street is a Unique Historic Setting recognised in the Domesday Book and designated an 'Area of Character' by BFC, indicating the Warfield area's rich heritage

**Purpose 5 – Assisting In Urban Regeneration**

- The proposed site is 3 miles away from Bracknell Town. The plan to build 130,000+ new square metres of science park is not reasonable while 1 million+ square feet of office space is unoccupied in Bracknell town centre.

## **2) Harm And Adverse Impact On Local Green Belt Environment & Wildlife**

### **2. (A) Destruction Of Birdlife Habitats:**

The proposed development is located inside the 7km SPA boundary (Special Protection Area) for birdlife

Red Kite populations – the Jealott's Hill agri-habitats & hedgerows that support rodents and rabbits are food supply for local red kites. The red kites are listed as a protected species in accordance with European Council Directive 2009/147/EC

Skylarks (another protected species - <https://www.bto.org/understanding-birds/species-focus/skylark>) nest in the ground dwelling agri-habitats of Jealott's Hill. Housing that replaces the existing agricultural fields and hedgerows will directly remove Skylark habitats and nesting sites.

### **2. (B) Destruction Of Additional Protected Species Habitats:**

There is a high likelihood of Badgers living in the proposed site – they are protected under the 1992 Protection Of Badgers Act.

There is a high likelihood of Great Crested Newts living in the proposed site – as listed under Annex II of the EU Conservation Of Species and Habitats Regulations 2010, it is an offence to disturb or damage the breeding site or resting place of Great Crested News.

There is a high likelihood of Bats living in the proposed site – as listed under Annex II of the EU Conservation Of Species and Habitats Regulations 2010, it is an offence to disturb or damage the breeding site or resting place of Bats.

There is a high likelihood of Stag Beetles living in the proposed site – they are protected under the Wildlife And Countryside Act 1981.

Hedgehogs have been identified living in the Moss End area. They're listed as a Species of Principle Importance in England under the Natural Environment and Rural Communities (NERC) Act 2006 Section 41, in Wales under the Environment Act 2016, and in Scotland under the Nature Conservation Act 2004.

- Hedgehog numbers have declined by 30% in rural areas over the past 10 years.
- Adult hedgehogs travel between 1-2km per night over home ranges as big as 10-20 hectares in size (British Hedgehog Preservation Society).
- Housing development of the proposed size will directly remove key hedgerow & grassland habitats as well as create a dramatic increase in local traffic and therefore increase the number of road deaths.

## **2. (C) Destruction of Grade 3 UK Priority Agricultural Habitats:**

The proposed site contains Hedgerow Habitats, Lowland Woodlands and Ponds, all of which constitute UK Priority Agricultural Habitats

The site is in a groundwater Source Protection Zone 3 - removal of trees and hedgerows that reduce surface water would increase risk of mineral and chemical pollution.

High elevation of the proposed site, the interconnected visibility with the wider area & lack of development of the surrounding areas will have a dramatic and detrimental impact on the landscape. Landscaped man-made areas are not equal replacements for long standing and naturally occurring agri-habitats and hedgerow habitats.

Bowyers Lane & Wellers Lane are both single car-width, lightly tarmacked country lanes. The Council is therefore suggesting single country lanes can support usage of 8,000 new cars without any further development which is unreasonable. Any development of both lanes would require widening and therefore further destruction of hedgerow habitats that line the full length of the lanes.

There have been no guarantees from the Council that the existing Syngenta site will be developed first prior to any new ground broken.

There have been no guarantees from the Council that the phases of development will progress outward, starting from the existing Syngenta site, in order to minimise disruption and ensure Green Belt land is only destroyed when development begins and not in advance.