



**WOKINGHAM
BOROUGH COUNCIL**

**WOKINGHAM BOROUGH COUNCIL
TOWN AND COUNTRY PLANNING ACT 1990
(AS AMENDED)
SECTION 78 APPEAL**

**LPA ref: 243099
Planning Inspectorate APP/X0360/W/25/3371069
LAND NORTH OF READING ROAD
ARBORFIELD**

REBUTTAL PROOF OF EVIDENCE – LANDSCAPE

CHRIS HANNINGTON

BSc (Hons) MPhil CMLI MRTPI

February 2026

Contents

0.0 Executive summary.....	2
1.0 Introduction.....	5
2.0 Mrs Brockhurst’s assessment of the value of the site	6
Treatment of “Unmanaged” Landscape under GLVIA3.....	10
3.0 Reframing to reduce the ZTV	12
4.0 Settlement Pattern.....	14
5.0 Arguments re Settlement Separation and countryside gaps.....	18
What is new in the Appellant’s February PoE.....	18
The consistency of the Council’s position.....	19
Summary Rebuttal (linked to Section 3 on Settlement Pattern).....	20
6.0 Reframing the value of vegetation internal to the site	20
7.0 An argument that harm is Localised, Transient and Not Material.....	21

0.0 Executive summary

0.1 This rebuttal addresses the arguments introduced in the Appellant's Landscape Architect's, Mrs Brockhurst's PoE.

0.2 In the light of this assessment it is clear that the Appellant's February Landscape PoE does not provide a reliable or policy-compliant landscape assessment. The Appellant's assessment consistently undervalues the landscape, misinterprets settlement pattern, and relies on unrealistic assumptions about vegetation, visibility, and perceptual change.

0.3 Across the Appellant's February Landscape PoE there is a persistent tendency to minimise the value of the site and its wider landscape context. Mrs Brockhurst attempts to characterise the landscape as "everyday" (as characterised in her own landscape categorisation, her PoE paragraph 2.36) implying intrinsically low worth. However, the NPPF requires planning decisions to *contribute to and enhance* 'mere countryside' by recognising *the intrinsic character and beauty of the countryside...and trees and woodland*.

0.4 This obligation to 'contribute to and enhance' by 'recognising the intrinsic character and beauty of the countryside...and trees and woodland', applies regardless of whether the landscape meets the threshold for valued landscape. Although it is clear that levels of enhancement required would be greater for valued landscape paragraph 187 does require that decisions should 'contribute to and enhance' even 'mere countryside'. Importantly, Mrs Brockhurst also underplays the importance of the site's six veteran and ancient trees, including T72, despite the agreed status of these trees as irreplaceable habitat and their strong visual and experiential presence within the landscape.

0.5 The Appellant similarly downplays historic and cultural associations, despite evidence that the land was formerly owned by John Walter, son of the founder of *The Times*, and formed part of the setting of Arborfield Hall owned by Sir John Conroy's son. Sir John having been comptroller of the Duchess of Kent's household and an acknowledged, if uncomfortably firm, influence on her daughter the future Queen Victoria. These associations enhance the historic interest of the landscape. Yet the Appellant's February Landscape fails to include this information which was included in the Council's Statement of Case. This approach is symptomatic of the Appellant's selective treatment of evidence.

0.6 The undervaluation extends to perceptual qualities such as tranquillity, wildness, rewilding, visual porosity and filtered views. The Appellant's February Landscape PoE treats unmanaged or naturally regenerating vegetation as being negative, even though GLVIA3 and the Landscape Institute's Clarifications recognise these same qualities as potentially increasing landscape value and susceptibility. Ms Crafer's observations concerning the site's layered vegetation, fen-like wet areas, brooding skies and sense of

wildness are therefore consistent with professional guidance. In contrast Mrs Brockhurst's approach is not.

0.7 The revised LiDAR derived ZTV presented in the Appellant's February Landscape PoE is not a reliable basis for assessing visibility. It assumes continued screening from boundary and internal vegetation which the Appellant's own indicative masterplan identifies for removal. This includes numerous trees along both the southern and interior parts of the site. The ZTV also relies on late summer foliage rather than winter openness, omits the visibility effects of s278 highways works such as lighting and signage along Reading Road, and fails to account for receptors using ARBO16 and ARBO19, and the Leopard 3 bus. GLVIA3 requires realistic, worst-case assessment rather than optimistic assumptions, and the February ZTV does not meet that standard.

0.8 Equally, the Appellant's revised interpretation of settlement pattern is not evidence led. The suggestion that the proposals represent logical infill, somehow uniting the 'outliers' (presumably outliers to these proposals as there is no village core apart from the old medieval one) within "Arborfield village" conflicts with the well-documented form of settlement in the area. Arborfield comprises two distinct nodes and a historic node now largely abandoned. The nodes are the Arborfield Green SDL and the distinctive hill-top settlement of Arborfield Cross, the historic medieval settlement of Arborfield is characterised by around the mill and the farm and the abandoned ruin of St Bartholomew's church. These are separated by areas of open countryside. Church Lane, Waldron Avenue and the housing abutting Reading Road and the southern site boundary are 'outliers', they do not form a village core. The appeal site lies within a countryside gap separating these three 'outliers' and has never formed part of a continuous settlement. The Appellant's reinterpretation of scattered dwellings as constituting a settlement is a development driven fabrication inconsistent with GLVIA3's requirement for reasoned analysis.

0.9 The Appellant's February Landscape PoE also adopts a new position that the development would not affect countryside gaps or settlement separation. This is incorrect. The appeal site performs a clear separation function between Arborfield Cross, the and the Church Lane and Reading Road outliers. Since the opening of the Relief Road, Reading Road now exhibits a notably tranquil, rural character. The proposed development, and particularly the s278 works, would introduce lighting, signage, road narrowing for footpaths and the bus stop, road widening for turning splays at the main entrance, movement and domestic activity that would both physically and perceptually erode this rural gap. This directly conflicts with Neighbourhood Plan Policies IRS1 and IRS2, both of which emphasise the importance of maintaining settlement separation and

0.10 The Appellant's February Landscape PoE's treatment of internal vegetation as making a low contribution is also inconsistent with both the Council's evidence and GLVIA3. Ms Crafer identifies the layered structure of scrub, wetland features, rewilding and small trees as integral to the landscape's perceptual qualities, while GLVIA3 acknowledges that unmanaged or rough vegetation can enhance experiential value. The

removal of this vegetation would significantly increase visibility, reduce scenic filtering, and heighten the magnitude of change. The Appellant's downplaying of this issue is therefore unjustified.

0.11 The Appellant's claims that harm is localised, transient and not material are similarly unsustainable. The Appellant's February Landscape PoE relies on optimistic assumptions about planting establishment, omits winter, nighttime and early year conditions, and fails to address the permanent urbanising influence of the housing, access and s278 highways works. GLVIA3 requires assessment of scale, duration, geographical extent and reversibility, and it emphasises the need for transparent, reasoned judgement. The evidence shows that harm would be substantial, long-lasting and entirely material.

0.12 Lastly, the Appellant's reinterpretation of Green Route policy CC03 is overly narrow and literal. The policy must be read alongside NPPF requirements to add to local character, retain existing trees wherever possible, and conserve and enhance the local and natural environment. The Green Route along Reading Road contains veteran trees and forms part of an important green infrastructure corridor. The proposed development, together with its required s278 highways works, would undermine these qualities and run counter to both local and national policy.

0.13 In summary, the Appellant's February Landscape PoE fails to present a credible, evidence based or GLVIA3 compliant assessment. It undervalues the landscape, misrepresents settlement form, underestimates visibility and perceptual impacts, minimises the significance of veteran trees and internal vegetation, and misinterprets policy requirements. The development would introduce a substantial suburban development into open countryside, eroding settlement separation, damaging the Green Route, and resulting in significant and enduring harm to landscape character and quality. Nothing in the Appellant's February Landscape PoE alters the conclusions reached in my main Proof of Evidence; indeed, the new material reinforces them and heightens my concern about these proposals.

1.0 Introduction

I am Chris Hannington, the Planning Trees and Landscape Team Manager at Wokingham Borough Council. This rebuttal is prepared in response to the updated Landscape Proof of Evidence prepared by Mrs Clare Brockhurst, dated February 2026 (the 'February Appellant Landscape PoE')(CD13.02.01 – 02). This rebuttal should be read alongside my main Arboriculture and Landscape Proof of Evidence (CD14.04), which I maintain in full.

1.1 This rebuttal focuses only on matters that are new when compared with the earlier appellant landscape proof (CD13.02.01 - 02). Those original points are already addressed in my Arboriculture and Landscape Proof of Evidence (CD14.04).

1.3 The February Appellant Landscape PoE introduces several areas of contention:

1. Reframing to undervalue landscape.
2. Reframing to reduce the Zone of Theoretical Visibility (ZTV)
3. Settlement Pattern Arguments
4. Reframing the value of vegetation internal to the site
5. An argument that harm is 'Localised, Transient and Not Material'
6. Reframing of the interpretation of Green Route policy
7. Arguments re settlement, separation and countryside gaps

I address each of these arguments in turn

2.0 Mrs Brockhurst's assessment of the value of the site

2.1 Under the heading Natural Heritage, and at paragraph 2.44, Mrs Brockhurst states that there are five veteran trees on the site. It is agreed in the SoCG that there are at least six. I maintain that one, T72, is an ancient oak. On this important issue, Mrs Brockhurst seems to undervalue the site

2.2 In paragraph 2.44 Mrs Brockhurst rather under-valued the veteran trees saying: 'However, their contribution to the character and value of the Appeal Site is masked by the other boundary trees'. It would be more accurate to say that 'in some cases their contribution to landscape character and value...'. Her statement is certainly not true of trees T39 – the 'walking' lime or T72 which becomes a landscape focal point in the proposed scheme precisely because, viewed from the site, it is such a fine feature and such a dramatic focal point. Mrs Brockhurst seems to undervalue the site

2.3 Under the heading 'Cultural heritage' at paragraph 2.45 Mrs Brockhurst states that 'the land to the west of the Appeal Site is annotated as a 'locally valued heritage asset''. But then she dismisses this added local value.

2.4 In the same paragraph Mrs Brockhurst, focussing only on a narrow view of the site and not looking at the wider landscape, states: 'This is not a landscape with clear evidence of archaeological or historic interest which contributes positively to the landscape'.

2.5 But Berkshire Archaeology's consultation response to the PA recommends a pre-commencement condition and states:

There are potential archaeological implications with this proposed development as demonstrated by Berkshire Archaeology's Historic Environment Record. Berkshire Archaeology welcomed the Deskbased Assessment submitted with the application; however I feel that the potential for archaeology will require mitigation. The site lies in an area with numerous cropmarks which suggest the wider area has been a focus of activity in the past, including possible enclosures c.70m east, linear marks c.250m northwest, settlement enclosures, trackway, and field system c.450-550m north. A Roman road runs north/south c.520m west of the site. There is evidence that St Bartholomew's Church c.550m northwest has 13th century origins and is likely to relate to a medieval settlement and Medieval stray finds, the nearest just c.9m outside the site boundary, have been found in the area.

The site itself does not appear to have been previously developed, therefore any archaeology below the plough line may remain undisturbed.

As shown, the application site falls within an area of archaeological significance and archaeological remains may be damaged by ground disturbance for the proposed development. It is therefore recommended that the following condition

is applied, should permission be granted, in order to mitigate the impacts of development. This is in accordance with Paragraph 218 of the NPPF(2024) which states that local planning authorities should 'require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible'.

Mrs Brockhurst undervalued the landscape in this regard.

2.6 In paragraph 2.48 Mrs Brockhurst states

Consideration of the historic mapping shows that the Appeal Site and its context has under gone change and fragmentation. It is not in a good physical state, its condition is towards the lower end of the spectrum as features have become eroded and modified so that the landscape elements do not exhibit good intactness. Reading Road and suburbanisation of the development to the north on Church Lane influence the perceived condition in the term of the Technical Note criterion.

2.7 Here Mrs Brockhurst looks at the wider landscape and does not focus solely on the site. Here it is clear that, in Mrs Brockhurst's opinion 'change and fragmentation' features that have been 'modified' so that 'the landscape elements do not exhibit good intactness' and 'suburbanisation' have undermined the landscape. Later she will argue that the change and subdivision of the landscape for housing, the modification of the landscape, the further fragmentation of landscape elements and 'suburbanisation' of the site, that will be the result of this development will somehow be beneficial.

2.8 In any case, even if one eschews the fine sentiments and subtle appreciation of this landscape by the Council's Landscape Architect who alluded to the site 'rewilding', which I do not agree we should, the landscape has its capabilities and could easily be improved by sensitive management. A scheme for 111 houses, access roads and extensive infrastructure is not required for that to happen. Simple agriculture could do that. Mrs Brockhurst greatly over-values the benefits of the development in this regard.

2.9 In paragraph 2.49 Mrs Brockhurst states that 'There are no known cultural or artistic associations with the site'. But this is more a function of Mrs Brockhurst's unfamiliarity with local history rather than a lack of interest in the landscape. Map 4 of *Land North of Reading Road Arborfield – Historic Maps* (CD04.03.39) which is 'A Map Of Windsor Forest And Its Vicinity 1823 By Henry Walter. New Edition Revised And Corrected 1856' shows clearly that this land parcel was owned by John Walter Esq. the son of John Walter the founder of the Times newspaper of London. The site also sits on the immediate boundary of the park of Sir Edward Conroy's Arborfield Hall. Arborfield Hall is where Sir Edward's father, Sir John Conroy, died in 1854. Sir John was comptroller to the Duchess of Kent and de facto guardian to her daughter, the future Queen Victoria. Although there are currently no known attributes marking them on this

site, the landscape does have associations. Mrs Brockhurst undermines the value of the landscape in this regard.

2.10 In paragraph 2.50, on 'Distinctiveness', Mrs Brockhurst states: 'The rural character is diminished, and the site is appreciated as a component of the widely settled context'. I disagree, the site is appreciated as open agricultural fields, albeit 'rewilding'.

2.11 In the same paragraph Mrs Brockhurst states her opinion that:

The sense of place is diminished by the lack of positive management and agricultural use, the road corridor and the properties backing on to the Site, it is appreciated as a remnant area which one passes rather than have a strong sense of place or contribution to the character and appearance of the landscape.

2.12 I disagree. The intrinsic character and beauty of the countryside encompasses many management patterns and intensities and given the poor drainage on this site it is likely that it has always been rough grazing at best. Not all fields are closely grazed or neatly ploughed. Again Mrs Brockhurst downplays the value of the site and its wider landscape.

2.13 Under paragraph 2.51 under the heading 'Recreation' Mrs Brockhurst again downplays the value of this unique landscape. She states:

2.51 The recreational value is limited through the lack of footpaths within the Appeal Site. The pedestrian footpath alongside Reading Road which connect the settled area is separated from the Site by the field boundaries, so the Site makes a limited contribution to the recreational experience for those walking through the area.

2.14 But the value of this landscape is that views from the south are filtered through the, at times sparser, hedgerow trees and shrubs. It is the visual porosity of the southern field boundary that encourages this. It is the filtered nature of medium distance views into the landscape that makes them special. In addition, these views are apparent to motorists and users of the Leopard 3 bus service from Reading to Wokingham. Further, there are two bus stops, one at either end of the site, so the views are visible for longer as the bus slows, stops, and then speeds up for each stop. Again, Mrs Brockhurst under-values the site.

2.15 In a section on 'Perceptual (scenic)' Mrs Brockhurst does mention the positive experience of open skies. But, again, she goes on to undervalue the landscape. Now looking at the wider landscape not the site, she mentions in paragraph 2.52 'detracting features, including pylons, large scale development, and the general perceptual sense of urban qualities'. However, I disagree. A line of pylons does cross Reading Road at the higher (Arborfield Cross) of the s278 works. But whilst pylons do detract from the countryside they are clearly features of both town and country. It is clear that lighting columns, though smaller, would in many cases be closer and therefore be perceived as more impactful and more detracting. Of course there would be cumulative impacts of

pylons and lighting columns particularly very close to where they cross the Reading Road. As for 'large scale development' and 'the general perceptual sense of urban qualities' these phrases simply do not characterise the site, the s278 works, or their settings.

2.16 In paragraph 2.53 Mrs Brockhurst clearly sees the landscape in a different light than Brigitte Crafer who says that views from Reading Road are

enhanced by the "sun, mist, and brooding skies, that captures the senses in terms of its scenic quality and sense of wildness that comes from its abandoned unmanaged character".

2.17 I have experienced this site in all seasons as I have driven around the borough and, for this Inquiry, on foot as well. I agree with my colleague, there is more to this site than can be appreciated by brief acquaintance. Mrs Brockhurst talks of views restricted by vegetation, marred by security fencing, low-voltage wires and poles, housing and traffic on the road between the view and the Site boundary. But despite this what Mrs Brockhurst proposes is views more restricted by landscape planting, more columnar structures (lighting columns), more signage, more traffic, all accompanying the one-hundred-and-eleven houses put forward in these proposals.

2.18 The landscape is not smart, or tidy, it is certainly not picture-box-perfect, nor does it have memorable or distinctive landmarks. It is too subtle for that. Mrs Brockhurst again undervalues this landscape

2.19 In a section headed 'Wildness and tranquillity' Mrs Brockhurst states at paragraph 2.56:

2.56 There is no evidence that the site and local area have any qualities that indicate they possess 'wildness.' Wildness has been defined in professional guidance as:

"The presence of wild (or relatively wild) character in the landscape which makes a particular contribution to sense of place¹⁵."

2.20 I disagree, there is a touch of wildness about the site. The low key management, the wetland fen-like nature of the lower, central part of the site with it's Norfolk reeds, the walking lime unmanaged and left to 'roam' the site, the self-seeded forbs left unmown spreading across the site. All these contribute to a touch of wilderness and 'rewilding'. Mrs Brockhurst undervalues the site.

2.21 Mrs Brockhurst states, at paragraph 2.57. that

The tranquillity of the area is diminished through the presence of the settlement, disturbance by traffic and night-time lighting from traffic on the road, street lighting in the cul-de-sac and illumination of the signs set within the carriageway.

2.22 And yet she proposes a scheme that will bring more traffic and night-time lighting from traffic on the road, street lighting in the development and illumination of road signs. I have addressed the issue of tranquillity by reference to CPRE tranquillity mapping from paragraph 7.37 of my Proof of Evidence. On the issue of tranquillity and even dark skies, I consider Mrs Brockhurst downplays the value of the landscape of the site and its setting.

2.23 In terms of the function of the site and its landscape Mrs Brockhurst discusses this in paragraphs 2.59 to 2.61. She finds that:

With the exception of the presence of the drainage ditches, two small ponds and wooded/scrub vegetation the Site does not make a positive contribution to the healthy functioning of the landscape, its functionality is not outstanding.

2.24 I consider that this downplays the functionality of the landscape. For example, the six ancient or veteran trees provide 'irreplaceable habitat'. But the landscape offers more in terms of the Green Route, part of a network of such routes of borough-wide importance. Further, this site offers, by its very wetness, valuable water attenuation in an otherwise well drained landscape. But it also offers a less tangible but no less important quality, an alternative 'otherness' to the visual landscape, an important counterpoint to the more intensively managed agricultural landscapes of the local area. I conclude that Mrs Brockhurst has again undervalued the landscape of the site and its setting.

2.25 Mrs Brockhurst concludes that her 'analysis indicates that the value of the landscape is local and with the exception of the veteran trees there is nothing that elevates the landscape to having a value as a whole or in respect of the specific attributes that reaches a level beyond a low, local value'.

2.26 However, I have shown here how Mrs Brockhurst consistently undervalues the site and its landscape, switches from a wide to a narrow view of the landscape as it suits her argument. She notes detractors to the landscape whilst proposing, as an advocate for the development, more of those same detractors for the landscape. Finally she fails to fully assess those attributes that raise the landscape, not above 'mere countryside' to valued landscape but to the value that Miss Crafer, with her local knowledge and her decade of service to the community of Wokingham, what Miss Crafer says is medium to high. I agree with Miss Crafer.

Treatment of "Unmanaged" Landscape under GLVIA3

2.27 Mrs Brockhurst undervalues elements of the landscape site on the basis that it is 'unmanaged' (paragraphs 2.24, 2.50 and the table on page 21), 'scrubby' (table on page 21), or lacking 'positive management'. This approach is inconsistent with the Landscape Institute's guidance. GLVIA3 is clear that the assessment of landscape value and susceptibility relies on narrative professional judgement rather than simply mechanistic

scoring or visual neatness. As the LI Clarifications state¹, ‘Landscape and visual resources (and changes to them) are not easily measurable. Those undertaking LVIA have to proceed by a process of description, analysis and reasoning, leading to assessment conclusions’. This approach reflects GLVIA3 paragraphs 5.28–5.36, which require assessors to consult appropriately and to explain why particular landscape attributes (including perceptual qualities) matter.

2.28 It follows that “unmanaged” appearance is not a proxy for low value. GLVIA3 paragraphs 3.32–3.37 establish that perceptual qualities — such as wildness, tranquillity, naturalness, roughness, and sense of remoteness — form part of the landscape baseline. The LI Clarifications emphasise this experiential dimension, reiterating that the purpose of LVIA is to identify ‘which aspects of landscape... are more important to the decision (and why)’ rather than superficially classifying the condition of vegetation. Where unmanaged features contribute to perceptual qualities, they may increase value and susceptibility. As Ms Crafer indicated in her original consultation response, this is highly relevant for this landscape.

2.29 Mrs Brockhurst’s reasoning also contradicts the Landscape Institute’s warning against mechanistic or formulaic down-rating. The Clarifications stress that GLVIA3 ‘is not a detailed recipe’ and overly restrictive interpretations ‘would prevent improvement and innovation... variation and debate are to be expected rather than discouraged’. This directly supports the established interpretation of GLVIA3 paragraphs 5.39–5.56, which require a transparent narrative about the magnitude of change, including how the removal of ‘unmanaged’ vegetation would alter perceptual qualities, enclosure, filtering, wetland function, biodiversity, and other landscape characteristics.

2.30 On this site, unmanaged or rewilding conditions — including fen-like wet hollows, scrub communities, natural regeneration, veteran-tree settings, and rough grassland — form part of the area’s perceptual character and ecological function. GLVIA3 requires these features to be assessed for their contribution to wildness, naturalness, biodiversity, and experiential quality, not dismissed because they are not actively maintained. The Clarifications reinforce this approach by highlighting that LVIA should explain ‘which aspects of landscape... are more important’ in shaping professional judgement. The unmanaged qualities of the site contribute positively to landscape value (GLVIA3 paragraphs 5.28–5.36) and susceptibility (GLVIA3 paragraphs 5.31–5.36).

2.40 Mrs Brockhurst’s approach — treating unmanaged land as evidence of “low” value — is therefore inconsistent with GLVIA3. It overlooks the perceptual, scenic and ecological significance of the natural rewilding process; it disregards the role of unmanaged vegetation in shaping and filtering a sense of enclosure and scenic value; and it fails to apply GLVIA3’s requirement for transparent, reasoned judgement. In contrast, the evidence of the Council, including Miss Crafer’s detailed account of scrub

¹ Notes and Clarifications on Aspects of Guidelines for Landscape and Visual Impact Assessment Third edition (GLVIA3)– Technical Guidance Notes 2024/01

layering, wet features and rewilding, accords with GLVIA3's treatment of unmanaged land as a positive, value-enhancing attribute, not a detractor.

3.0 Reframing to reduce the ZTV

3.1 In her February PoE, Mrs Brockhurst introduces a LiDAR-derived ZTV and asserts that the 'landscape/visual envelope is much smaller' and that visibility is 'well contained' (paragraphs 1.28 and 7.17). However, this conclusion relies on the continued presence of interior scrub, unmanaged vegetation and boundary trees and hedgerows which she apparently treats as permanent features. As noted in my Proof (paragraphs 7.90 – 7.94) reliance on screening vegetation is unreliable.

3.2 Whilst this is an outline application and even the 'amended illustrative masterplan' is only illustrative, Mrs Brockhurst uses it to test and later to demonstrate her ZTV and amended ZTV. So it is right for us, therefore, to respond to the masterplan, however likely it is to future amendments, however illustrative, to try to understand how this scheme will be likely to be experienced on the ground. Miss Crafer notes in her consultation response that much of this vegetation is scheduled for removal or modification. On page 5 she states:

T14 classified 'B' an early mature Oak located on the southern boundary and will be removed to facilitate access, I cannot see why it is necessary for T14 to be removed where there is plenty of space between trees T11 and T12 resulting in no tree removals and retention of all the trees, and the hedgerow along the southern site boundary with Reading Road.

3.3 And

In addition, the following trees within the southern boundary hedgerow will be removed; 2 Ash T23, T24 , 1x T25 Blackthorn and 1 x T26 Goat Willow, to make way for development. These trees contribute to the boundary vegetation and will be lost to a new paths and a road. Working around retained trees could make for a more interesting layout.

3.4 And

T69 and T71 Turkey Oak , T70 Oak, G73 a group of Oak. T74 Oak, G81 group of Willow, T82, Oak, G83 Willow, G84 Ash, T88 Hawthorn, G90 Willow all will be lost to the masterplan, but retaining more of the Goat Willow (Salix caprea) is a species indicative to the site, and is an early source of nectar for bees and other insects. The Willows form linear structures around the site and more should be done to retain these trees for their contribution to the site character and biodiversity.

3.5 On page 9 she continues:

The visual sensitivity conclusion states that the site is largely enclosed by vegetation and views into it are heavily filtered. However, this does not take account of the impact of trees removed for development – such as the Ash that take up quite a large span of the western boundary hedge, and the plan to remove all of the interior vegetation to facilitate development. The layering of landscape features across the site and the screening they provide will be lost. In addition, the boundary screening will be clipped and managed in ways that are synonymous with human habitation and perception of development will be clear in views from Reading Road by all users.

3.6 It is therefore implausible to base a reduced ZTV on vegetation that will either not be present once construction begins, or, is impermanent and unreliable as described in the two appeals at Barkham Manor Farm and Woodlands Farm appeals. Screening developments is a last and unreliable resort. Even on plan led sites, integration of schemes into the landscape, and not screening, is key.

3.7 The Appellant's February Landscape PoE presents a 'substantially smaller' study area, but as has been shown above, this is a product of factoring in the current screening effect of vegetation much of it deciduous and much of it likely to be removed for various reasons. Miss Crafer identifies that the internal vegetation presently provides 'layered filtering' rather than robust containment and, on page 6 of her consultation response, she refers to the effects of management and seasonal changes with screening being thinned by management and autumn leaf drop increase still further the transparency of vegetation that is already thin in place. This point echoes the Landscape Institute's caution that LVIA must rely on 'description, analysis and reasoning' rather than mechanistic interpretations of current vegetation screens.

3.8 The Appellant's February Landscape PoE ZTV does not model the effects of the s278 highways works along Reading Road, including lighting, signage and widening of footways. These elements materially increase visibility, as noted in my PoE. By excluding these works from her ZTV, Mrs Brockhurst filters out a significant impact and its effects on a wider swathe of landscape.

3.9 GLVIA3 also expects assessors to recognise seasonal openness and structural vegetation change. The LI's guidance note on GLVIA is clear, on page one, that LVIA is not 'a detailed recipe' and that overly restrictive interpretations 'would prevent improvement and innovation'. Mrs Brockhurst's reliance on photographs with foliage still on the trees runs contrary to this, overlooking the extent to which winter views reveal the construction works from Reading Road, Church Lane and footpath ARBO16 and Byway Open to All Traffic (BOAT) ARBO19. This is noted in both my PoE ('paragraph 7.28) but, of course, users of ARBO19 may be mounted and therefore even more sensitive to views of the proposed works as they traverse the countryside. This is another example of receptors not accounted for in Mrs Brockhurst's assessments.

3.10 The Appellant's February Landscape PoE also assumes that the new development can be screened by retained vegetation. However, as Miss Crafer's

consultation response confirms (pages 2 and 9), the removal of internal vegetation, combined with the introduction of new access points, hard urban structures, signage, road markings, lighting columns and lighting, will increase the overall openness and visibility of the site, particularly during the early years before even partial establishment of planting. The Appellant's February Landscape PoE therefore underestimates visual impacts and effects, contrary to GLVIA3's requirement for realistic worst case assessment.

3.11 In summary, the amended, LiDAR-based, ZTV presented in Mrs Brockhurst's PoE does not represent either the operational baseline, the winter baseline or a night-time baseline, following clearance and s.278 works. It models containment effects that will not exist should the appeal be allowed, excludes critical receptors, and disregards the increased visibility resulting from the highways works. Both my PoE (paragraphs 0.6, 0.11, 7.3, 7.20*, 7.27, 7.82, and particularly 7.23 and 7.78) and Miss Crafer's consultation response (page 6 paragraph 6, page 8 paragraph 6, page 8 paragraph 7, page 9 paragraphs 9 paragraphs 1 – 3, etc.) demonstrate that the actual landscape and visual envelope is larger than claimed, not smaller. It is important to note that a revised ZTV and winter photographic analysis are required; without these, Mrs Brockhurst's assertions of 'contained visibility' cannot be relied upon.

4.0 Settlement Pattern

4.1 In her February PoE, Mrs Brockhurst advances a new position by recasting the site as forming part of the settlement of Arborfield (paragraph 2.9). She presents the appeal site as a logical infilling opportunity consistent with an alleged established settlement grain. This reframing is used to justify the claim that the development would not erode rural separation. However, as set out in my PoE (section 4.0), this characterisation does not reflect the actual settlement pattern, which is sparse, loosely arranged and highly sensitive to suburbanising influences. Indeed, Mrs Brockhurst's argument advanced in paragraph 2.9 relies on 'outliers on Greensward Lane and Waldon Avenue' which 'reinforce the sense of settlement to the landscape and mark the arrival to Arborfield Village from Reading Road'. But there is no 'Arborfield Village' that would be recognizable to any reasonable assessment.

4.2 In her paragraph 2.8, Mrs Brockhurst mentions 'existing settled elements in the immediate environs of the Appeal Sites'. But there is a very clear edge to the settlement of Arborfield Cross and a very clearly delineated and substantial countryside gap between the appeal site and that settlement. As shown in section 4 of my PoE (CD14.04) there is the old medieval settlement of Arborfield, there is the late medieval/early modern settlement of Arborfield Cross and there is the new Strategic Development Location (SDL) of Arborfield Green based on the site of the First World War army depot. The three lie one on the River Loddon (albeit with 'outliers' as Mrs Brockhurst recognises) one on the top of a significant ridge and one on the other side of that ridge to the south-east. They are distinct and separate.

4.3 Further on this issue Mrs Brockhurst seems to be confused about the centre of the old settlement of Arborfield, now reduced to 'outliers' substantial 19th and 20th century countryside properties and farms. Mrs Brockhurst states:

Arborfield Village typically comprises development set within a wooded framework, originating from the church and then extending along Church Lane (with redeveloped or expanded plots), with outliers on Greensward Lane and Walden Avenue.

4.4 This is clearly incorrect. As shown in the series of historic maps provided with the Council's Statement of Case (CD04.03.39) the medieval settlement of Arborfield grew up around the mill, the manor and the old (medieval) church of St Bartholomew and not around the new (19th century) St Bartholomew's church on Church Lane as Mrs Brockhurst appears to indicate (her paragraph 2.12).

4.5 In terms of the way it is perceived in the landscape, there is no 'settlement' of Arborfield. It is merely a scattering of small 'outliers' and farmyards across the landscape close to the centre of the relict medieval village but not part of it. The manor is gone, the church is an abandoned ruin, the cots of the villagers have subsumed into the landscape. Only the mill building, the farm there and the estate workers cottages remain in the countryside with scattered 'outliers', not a settlement, developing slowly from the turn of 20th century onwards. Map B, titled 'Where people live' from the Arborfield Neighbourhood Plan (CD06.03), reproduced below for ease of reference, illustrates the difference between the non-settlement of Arborfield the settlement of Arborfield Cross and the Strategic Development Location of Arborfield Green.

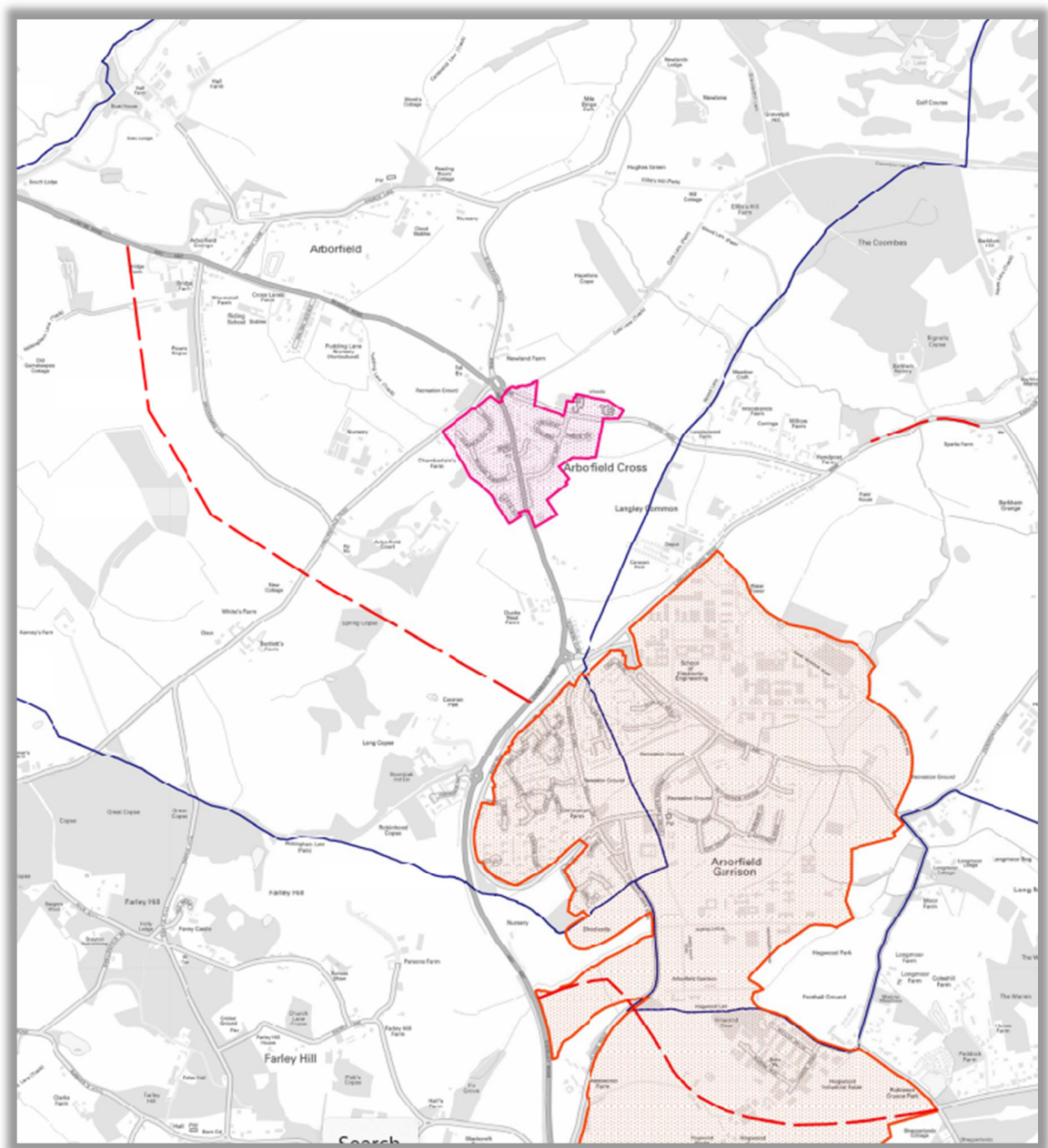


Figure 1: Map B 'Where People Live' from the Arborfield and Newland Neighbourhood Plan. Arborfield Green SDL is outlined orange, Arborfield Cross is outlined red, the Arborfield Cross relief Road – Observer Way – is shown by a dashed red line to the SW of Arborfield Cross.

4.6 It is true that a new Loddon Valley Garden Village is planned for a space incorporating the old medieval village, but it is not planned to even incorporate the Church Lane ‘outlier’, let alone the site and certainly not the area affected by the s278 highways works.

4.7 What is new in Mrs Brockhurst's PoE is the shift from acknowledging the site's countryside role to suggesting that its relationship with Arborfield is already functionally urbanised. Mrs Brockhurst contends that the site reads as an extension of the village and that its development would simply continue the existing settlement form (paragraphs 2.9 to 2.13). This contradicts the established evidence base, including the WBC Landscape Character Assessment (J2 and C1), which consistently identifies this area as part of an open rural landscape. As demonstrated in my PoE (Paragraphs including 0.2, 0.6, 3.1, 3.3, 4.11, 4.20 and 4.21, 5.40, 5.86, 7.11, 7.16, 7.25, 7.36, 7.37 and Figures 10 and 11, paragraphs 7.52) and here, the site does not form part of any coherent settlement fabric.

4.8 This is important because settlement-pattern evaluation under GLVIA3 requires the assessor to consider perceptual and experiential qualities, not just spatial geometry. The Introduction to the Landscape Institute's Notes and Clarifications emphasises that LVIA must proceed by 'description, analysis and reasoning' rather than mechanistic interpretations of pattern or form. The guidance also stresses that the purpose of LVIA is to explain 'which aspects of landscape... are more important to the decision (and why)'. In this case, the rural character, relative tranquility, and perceptual openness is a defining characteristic of this landscape. Treating the site as if it were already part of a settlement fails to apply the principles of 'description, analysis and reasoning, and instead substitutes a development-led ambition for evidence-based character analysis.

4.9 Moreover, GLVIA3 (as clarified by the technical guidance) explicitly cautions against overly restrictive or formulaic analyses of settlement pattern, reminding practitioners in the 'context' section of the introduction that LVIA 'is not a detailed recipe' and that rigid interpretations 'would prevent improvement and innovation' in assessment practice. Mrs Brockhurst's approach, which treats scattered 'outliers' as evidence of a continuous settlement edge or the core of a settlement, is precisely the kind of mechanistic reasoning the LI warns against. My own PoE (section 4.0) sets out clearly that the site reads not as infill but as countryside between sporadic, unrelated 'outliers' and farms.

4.10 This aligns with the Arborfield & Barkham Neighbourhood Plan, particularly policies IRS1 and IRS2, which recognise the importance of maintaining gaps between settlement clusters. The proposal would undermine these policies by introducing a large suburban housing scheme into a space whose value relies on its role as open countryside.

4.11 In summary, the Appellant's February Landscape PoE's re-framing of the site as an appropriate infill location is not supported by the settlement-pattern evidence, the WBC LCA, or the Neighbourhood Plan. The site functions as countryside and contributes materially to physical and perceptual separation of the various 'outliers' identified by Mrs Brockhurst. GLVIA3 principles, as clarified by the LI, require that such perceptual attributes be given weight, and that settlement-pattern assessments reflect narrative professional judgement. The Appellant's February Landscape PoE does not

satisfy these requirements. Consequently, the development would erode both the rural gap and the character of the settlement pattern, contrary to WBC LCA strategies for the C1 and J2 Landscape Character areas, Neighbourhood Plan policies IRS1/IRS2, and the evidence presented in both my own Proof of Evidence and Miss Crafer's consultation response to the original planning application.

5.0 Arguments re Settlement Separation and countryside gaps

What is new in the Appellant's February PoE

5.1 This section is closely related to, and should be read in the context of the previous section on Settlement Pattern.

5.2 The Appellant's February Landscape PoE asserting even more strongly than before that the proposed development would not erode the countryside gap and would have no meaningful effect on settlement identity. It argues that the appeal site is not perceived as forming part of any gap, and that it makes no material contribution to separation between settlements. In a way this is true as there is effectively no settlement of Arborfield, merely a collection of 'outliers', to use Mrs Brockhurst's terminology.

5.3 However, even if there was a perceived settlement as Mrs Brockhurst states: 'originating from the [new] church and then extending along Church Lane, the proposed development site plays an important role in separating it from 'outliers', particularly those along Reading Road and at Waldron Avenue.

5.4 Furthermore, the s278 works are particularly important. Reading Road, particularly at that point, presents as an unlit country lane, with little in the way of development apart from the narrow pavement historic traffic calming measures. The lane is far less busy since the construction of the Arborfield Cross Relief Road and now presents as a country lane, and an area of relative tranquillity (see CPRE map, Figures 10 and 11 at paragraph 7.37 and 7.38 of my PoE).

5.5 Mrs Brockhurst's refusal to grapple with these inconvenient truths and her doubling down on that refusal in her February Landscape PoE seems to me to demonstrate a bias in her thinking in favour of the development, almost as if she is undertaking planning balance arguments in her February Landscape PoE (see her PoE paragraphs 1.54 and 2.4 to 2.7).

5.6 This represents a significant reframing of the Appellants arguments over the site's role within the local landscape and departs from their earlier apparent acceptance of the site's countryside character.

5.7 As shown in Section 3 on the Settlement Pattern, the Appellant's attempt to reposition the site as part of an urbanised or semi-urban settlement fabric is not supported by any objective assessment of actual settlement pattern. The landscape

around the site consists of sparse, loosely distributed, small 'outlier' developments, farms and fragments of the relict medieval settlement, not any continuous or coherent village form. On that basis, the site plays an essential countryside role. It is precisely the type of rural land that forms the functional and perceptual countryside gap between Arborfield Cross, Arborfield Green, and the scattered historic outliers around the old mill and church.

The consistency of the Council's position

5.8 The Council's evidence is therefore consistent:

- the physical countryside gap would be reduced, because the scheme introduces a substantial suburban extension into open countryside;
- the perceptual gap would be eroded, because built form, lighting, suburbanisation and the hubbub of daily life would intrude into what is currently an open rural interval, a tranquil pause in an increasingly busy borough;
- the identity of the distinct settlement clusters is weakened, because the appeal proposals would not read as part of any of them (as explained in paragraphs 3.1–3.10 above).
- The proposals do not conform to the future planned development on the other side of Church Lane which reads better in terms of the landscape and has better linkages at the end of Observer Way, the Arborfield Cross Relief Road.

5.9 The Appellant's claim that the site does not contribute to separation is only achieved by mischaracterising the settlement pattern, an issue explained in detail in Section 3.

5.10 GLVIA3 makes clear that landscape assessment must consider perceptual qualities, including a sense of separation, rurality, and settlement distinctiveness. The LI's Notes and Clarifications emphasise that LVIA must be based on

- description,
- analysis, and
- reasoned professional judgement, not on mechanistic interpretations of spatial geometry or development-led re-labelling of character.

5.11 As shown in Section 3, the Appellant's reinterpretation of scattered outliers as a continuous settlement edge is precisely the type of rigid, formulaic and unreasoned approach that the guidance warns against. Because the site sits within a weakly settled, visually permeable rural corridor, GLVIA3 requires that its perceptual contribution to separation be given significant weight.

Summary Rebuttal (linked to Section 3 on Settlement Pattern)

5.12 When assessed against the settlement-pattern analysis in Section 3 and the GLVIA3 principles noted above, the Appellant's argument fails for three reasons:

1. The site is countryside, not settlement. As shown in Section 3. It is part of the rural interval between distinct settlement nodes, not an infill or extension opportunity. This is particularly so in the light of planned development at the Loddon Valley Garden Village.
2. The proposal would be seen and perceived within the gap, reducing both physical distance and perceived openness as well as undermining the character and appearance of the countryside.
3. The scale of development and its suburban form would undermine the rural setting
4. This is contrary to IRS1, IRS2 and Core Strategy Policy CP11.
5. Re-characterising the site as 'settlement' has evolved through the course of the appeal from the 'illustrative masterplan' (CD01.06) to the amended illustrative masterplan (CD23.01). It is clearly not evidence-led, but is a development-driven reinterpretation that conflicts with the WBC LCA (J2 and C1), Local Plan policy TB21, the Neighbourhood Plan evidence and the Council's PoE.

5.13 The proposal would erode settlement separation and harm countryside character and quality, and the Appellant's February Landscape PoE does not offer a credible landscape basis for concluding otherwise.

6.0 Reframing the value of vegetation internal to the site

6.1 The arboricultural impact assessment and Mrs Brockhurst's assessments appear to downplay the importance of the vegetation internal to the site.

6.2 Leaving aside the 'irreplaceable habitat' of the veteran trees that are internal to the site, the Council's evidence shows that the internal vegetation is integral to the site's structure and perceptual qualities. Miss Crafer, in her comments of 26.02.25, identifies: 'The layering of landscape features across the site and the screening they provide' (CD02.22 page 9); and 'the layering of the vegetation from grassy open space to native scrub, emerging into small to mature trees some of which mark the field boundaries from the historic landscape' (CD02.22 page 2) as being noteworthy. On page 7, she notes the

views of the site from Reading Road of the vegetation of the interior are enhanced by the sun, mist, and brooding skies, that captures the senses in terms of its scenic quality and sense of wildness that comes from its abandoned

unmanaged character so its perceptual qualities are strong and like all landscape is enhanced by beneficial weather conditions.

6.3 My own PoE (CD14.04 paragraphs and 7.6 and 7.78) similarly describes this vegetation as being important for experience of the Green Route through filtered views out and through the landscape and thereby the experience and enjoyment of the Green Route.

6.4 As previously noted the Landscape Institute's Notes and Clarifications on GLVIA3 (technical note 1/2024 CD18.08) remind practitioners that LVIA must proceed through 'description, analysis and reasoning' and that landscape assessment is not a mechanistic scoring exercise. The guidance stresses that assessors must identify 'which aspects of landscape... are more important to the decision (and why)' and warns that LVIA is not 'a detailed recipe' and that restrictive interpretations 'would prevent improvement and innovation'. These principles apply directly here: rewilding vegetation with a low level of management input cannot be dismissed simply because it is not formally maintained no matter how much this argument might appeal to a tidy-minded farmer or land manager. Its perceptual and experiential functions must be considered as part of the landscape baseline.

6.5 Mrs Brockhurst's PoE's note on internal vegetation as 'removed to accommodate the development' in the section on 'woodland' in table LP5.1 and as having 'mid to low range – neutral' effects (CD13.07.01) conflicts with these principles and with the evidence provided by both the LPA and Miss Crafer. The internal vegetation is not incidental; it is a defining characteristic of the site's natural rewilding. Its removal would increase the magnitude of change, heighten visibility, reduce the interest of filtered views, and erase much of the site's distinctive perceptual quality. Mrs Brockhurst's PoE therefore underestimates both the site's current landscape value and its susceptibility to change. Ms Crafer's assessment of the value of the internal vegetation here is the right one.

6.6 In summary, the internal vegetation contributes significantly to value, susceptibility and scenic character, and its loss would represent a major alteration, and deterioration of the landscape baseline. Mrs Brockhurst's PoE does not provide a credible or policy-consistent assessment of these effects. The evidence of both my PoE and Miss Crafer's consultation response to the original planning application demonstrates that the Appellant's downplaying of internal vegetation is neither justified nor aligned with GLVIA3 as clarified by the Landscape Institute's technical guidance note.

7.0 An argument that harm is Localised, Transient and Not Material

7.1 In Mrs Brockhurst's PoE, she reiterates her claim that landscape and visual harm is 'localised' (paragraphs 5.8, 5.13 and 6.5.7) and temporary (as evidenced by her chosen Accurate Visual Representation [AVR] viewpoints in CD13.02.02). Because of

this she argues that the harm is not material to the planning decision. She introduces AVRs suggesting that adverse effects would diminish within '5–10 years', further arguing that beyond the immediate edge of the site there is no change and that there is no adverse perception from Reading Road or Church Lane. This reframing relies on optimistic assumptions about the growth of mitigatory planting, and the reliability of mitigatory planting, and does not reflect the landscape's actual susceptibility.

7.2 This position contradicts the LPA's evidence, which identifies a highly sensitive rural landscape and a pronounced change from countryside to suburbia that would arise from the proposed scheme and the associated s278 highways works along Reading Road between the site and Arborfield Cross. Persistent visibility from Reading Road and Church Lane, particularly around access points, is noted in my PoE (CD14.04 paragraphs: page 80 7.4, page 84 7.16, page 91 7.23, 7.24, 7.25, page 94 7.33, page 102 7.58, page 108 7.78, page 109 7.81 7.84,). Miss Crafer's consultation response of a year ago highlighted that the removal of layered internal vegetation would eliminate much of the existing filtering of views in from the Reading Road.

7.3 Furthermore, whilst a very limited number of winter photographs have been provided, no photomontages (showing the proposed development) have been. In addition, no photographs of the s278 proposals, or night-time photomontages have been provided in the appellants landscape evidence. Mrs Brockhurst's PoE does not, therefore, adequately account for visual effects during winter conditions when leaves have fallen from the mostly deciduous trees, for night-time impacts from lighting on the site, at the access points and for a considerable distance along the Reading Road to Arborfield Cross, both of which amplify visibility and perceptual harm.

7.4 GLVIA3 requires that magnitude of change be assessed through reasoned judgement, with particular regard to size and scale, geographical extent, duration and reversibility. The LI's *Technical Guidance Note 2024-01 Notes and Clarifications on Aspects of Guidelines for Landscape and Visual Impact Assessment Third edition* (GLVIA3) stresses that LVIA must be based on 'description, analysis and reasoning' rather than mechanistic assumptions and that the assessor must identify 'which aspects of landscape... are more important to the decision (and why)'. The same technical note warns that LVIA 'is not a detailed recipe' and that overly restrictive or optimistic interpretations 'would prevent improvement and innovation'. This is directly relevant here: reliance on rapid vegetation establishment in Years 1–5 is not supported by GLVIA3 practice, nor by the actual vegetation structure on the site.

7.5 Mrs Brockhurst's PoE places weight on late summer AVRs before the autumn leaf-drop. But, as discussed above, it omits appropriate graphic representations of worst-case winter scenarios. GLVIA3, as interpreted through LI TGN 2024-01, emphasises that landscape and visual resources 'are not easily measurable' and require professional judgement that recognises seasonal variation and perceptual change. My PoE (paragraphs 7.28 and 7.36) and Miss Crafer's (paragraph 4.3) each confirm that winter exposure along Reading Road, Church Lane and footpath ARBO16 and Byway

Open To All Traffic ARBO19, will be materially greater than in summer. Mrs Brockhurst's PoE therefore underestimates both the spatial and temporal extent of effects.

7.6 In summary, the harm arising from the proposed development (including the s278 highways works required) is neither transient nor confined to the immediate site boundary. Early-year effects are substantial and prolonged in perceptual terms, compounded by the removal of internal vegetation and by constraints posed by veteran trees and SuDS features that limit opportunities for meaningful screening. Indeed, as argued in my PoE, the attenuation ponds will be significant and intrusive features in their own right. There will be significant and long-lasting effects on the landscape resulting from these proposals. Mrs Brockhurst's PoE does not provide a robust or GLVIA3-compliant basis for concluding that harm is localised, temporary or immaterial, and its conclusions are inconsistent with my PoE, Miss Crafer's findings, and the interpretative guidance provided by LITGN 2024-01.