

Planning Statement

Proposed Cognition & Learning (C&L) Resource Base – The Bulmershe School, Woodlands Avenue, Woodley RG5 3EU

Applicant: Wokingham Borough Council (WBC)

Prepared by: WBC Development Team

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1. Introduction

This Planning Statement is submitted in support of a full planning application by Wokingham Borough Council for the development of a new Cognition & Learning (C&L) Resource Base at The Bulmershe School, Woodlands Avenue, Woodley. The proposal forms part of the Council's strategic programme to expand specialist SEND provision across the borough, ensuring that secondary-age pupils with Cognition & Learning needs can access high-quality, structured support within an inclusive mainstream environment.

The proposed development comprises a single-storey modular building providing one larger classroom, several smaller teaching and resource rooms, small-group and sensory spaces, a Kitchen/Life Skills area, staff accommodation, WCs and plant, together with a secure external learning environment designed specifically for C&L pupils. The building will be located on an area of underused grass adjacent to the existing Table Tennis Building and sports courts, forming a self-contained but well-integrated addition to the wider school campus. The preferred siting has been selected following a location options appraisal, identifying this position as offering the strongest access links, good visual connection to the school, and minimising impacts on operational outdoor space.

The scheme has been developed to RIBA Stage 3 and is supported by a suite of technical documents, including a Design and Access Statement, Transport Assessment, Biodiversity Net Gain (BNG) assessment, Noise Impact Assessment, Sustainability and Energy documentation, Drainage Strategy and Ground Conditions appraisal.

The purpose of this Planning Statement is to assess the proposed development against the statutory Development Plan for Wokingham Borough - comprising the Core Strategy (2010) and the Managing Development Delivery (MDD) Local Plan (2014) - as well as the National Planning Policy Framework (NPPF, 2024 as amended 2025). It demonstrates that the development complies with the relevant policy requirements relating to educational need, design quality, accessibility, sustainability, transport, flood risk, biodiversity, landscape, amenity and open space protection.

2. Site and Context

The Bulmershe School is located on Woodlands Avenue, Woodley, within a mixed educational and leisure campus that includes Addington School, Goals Reading, the Bulmershe Leisure Centre and accompanying sports facilities. The wider setting is suburban, with established green space, extensive playing fields and clusters of school buildings forming a well-established educational environment.

Vehicle and visitor access is taken from the existing main school entrance and car park to the north-east of the site, with pedestrian routes connecting the campus to surrounding facilities and circulation paths. These routes provide safe and convenient access across the wider school grounds.

The school buildings comprise a mixture of historic brick blocks, later modular additions and community sports buildings, including the Table Tennis Club and gym. The surrounding outdoor environment features large areas of playing field, sports courts and informal grassed space, including the underused green area selected for the new SEND unit. Site levels and the relationship to the adjacent sports courts have been taken into account in identifying an appropriate and accessible development location.

3. Proposed Development

The proposal comprises a single-storey modular Cognition & Learning (C&L) Resource Base providing specialist accommodation for approximately 25 pupils. The building contains one larger classroom for whole-group teaching, several smaller classrooms and resource rooms, small-group and sensory/intervention spaces, a Kitchen/Life Skills area, staff workspace, hygiene and WC facilities, plant, storage and associated support areas.

The new unit is positioned on an underused area of grass adjacent to the Table Tennis Building and sports courts, well away from residential boundaries and close to established school circulation routes. The location reflects a three-option appraisal set out in the DAS, with the preferred option providing the best balance of accessibility, integration with the main school, safeguarding, and minimal disruption to wider playing field activities.

A secure, dedicated external learning and play area is proposed, incorporating new planting, sensory landscape elements and mesh-fenced boundaries that maintain visibility across the surrounding green space. Given the site's sloping levels, minor retaining structures are included to create an accessible platform for the modular building. The modular construction approach minimises disruption during installation and ensures a consistent, robust building form aligned with WBC's wider SEND programme.

Vehicular access, parking and drop-off arrangements utilise the existing Bulmershe School entrance and car park to the north-east, with SEND pupils accessing the unit via established pedestrian routes across the campus. No new vehicle access is required.

The development provides a purpose-designed, inclusive and self-contained facility that integrates effectively with the existing school environment while meeting the borough's identified need for enhanced Cognition & Learning provision.

4. Planning Policy

The statutory Development Plan for Wokingham Borough comprises the Core Strategy (2010) and the Managing Development Delivery (MDD) Local Plan (2014). The proposed SEMH Resource Base has been assessed against the relevant policies of both documents.

Core Strategy (2010):

- CP1 – Sustainable Development: Ensures high-quality, accessible, low-impact development.
- CP2 – Inclusive Communities: Supports provision for pupils with Special Educational Needs within mainstream settings.
- CP3 – General Principles for Development: Secures appropriate design, layout and relationship with surrounding uses.
- CP6 – Managing Travel Demand: Encourages safe, efficient access arrangements.
- CP7 – Biodiversity: Protects ecological features and supports enhancement where appropriate.

MDD Local Plan (2014):

- CC01 – Presumption in Favour of Sustainable Development
- CC03 – Green Infrastructure
- CC04 – Sustainable Design and Construction
- CC06 – Noise
- CC07 – Parking
- CC09 – Development and Flood Risk
- CC10 – Sustainable Drainage
- TB08 – Open Space
- TB23 – Biodiversity and Development

The proposal's compliance with each relevant policy is demonstrated in the subsequent assessment section.

5. Key Planning Issues

5.1 Principle of Development

The proposal delivers a new Cognition & Learning (C&L) Resource Base as part of Wokingham Borough Council's programme to expand local SEND provision. The development is located within an established secondary school campus and makes use of an underused grassed area adjacent to the Table Tennis Building and sports courts. The DAS confirms the facility provides specialist spaces consistent with BB104 principles and WBC's SEND Resource Base model.

The principle of development is therefore fully supported by policies promoting inclusive education and the sustainable use of existing school sites.

5.2 Design and Layout

The single-storey modular building is positioned to integrate with existing school circulation, using a clear rectilinear form, robust materials and an orientation that looks back towards the main school buildings. The layout provides one larger classroom, smaller teaching and resource rooms, sensory/intervention space, a Kitchen/Life Skills room, staff and office areas, WCs and plant. The DAS confirms that the chosen siting reflects a location options appraisal and offers strong pedestrian links, safeguarding benefits and minimal impact on day-to-day school operations. The scale, appearance and arrangement of the building are appropriate to the campus and compliant with Core Strategy and MDD design policies.

5.3 Landscape and Trees

The chosen site avoids mature trees, with only one small memorial tree requiring relocation or replacement. The DAS and BNG strategy confirm that impacts are very limited and will be fully mitigated through new planting, including opportunities for biodiversity enhancement along the unit's perimeter and sensory garden. No significant arboricultural constraints arise.

5.4 Transport

Access is via the existing Leisure Road entrance, with a dedicated drop-off and staff parking arrangement provided within the existing Grays Crescent car park. The Transport Statement confirms that up to 8 staff and around six pupil drop-off vehicles (parent cars or WBC taxis) will use this area at peak times. Movements are very light, supervised and occur within existing school operating hours. Staff parking demand is modest and will be managed within 11 allocated spaces, with strong pedestrian, cycle and public transport access reducing car dependency. The TS concludes that the development will not result in a severe impact on the local highway network.

5.5 Flood Risk and Drainage

A detailed Drainage Strategy prepared by Jomas Associates shows that the development sits on greenfield land with very low natural runoff (0.1–0.5 l/s). Because the underlying London Clay does not allow water to soak into the ground, surface water will be managed entirely on site. This is achieved through a combination of an underground attenuation tank and a landscaped bioretention (rain-garden) area, which temporarily hold back rainfall and release it slowly. Discharge from the system will be limited to **0.5 l/s** and directed, via a small pump, into the school's existing surface water sewer before connecting to the Thames Water network.

The system has been designed to accommodate even extreme rainfall events, including the 1-in-100-year storm with an additional 40% climate-change allowance, without causing surface flooding. Should the drainage system ever exceed capacity or fail, excess water will follow

established overland flow routes away from buildings, as shown in the submitted drainage drawings. A SuDS maintenance plan accompanies the application to ensure the long-term performance of the system. Foul drainage will continue to use the existing Thames Water connection.

Overall, the proposed strategy fully complies with national planning policy and the requirements of the Lead Local Flood Authority.

5.6 Noise and Residential Amenity

A background noise survey identifies daytime and night-time background sound levels of 47 dB(A) and 37 dB(A) respectively at the nearest residential dwellings. Plant noise limits are therefore set at or below these values, ensuring a low impact under BS 4142. Internal and external school noise criteria under BB93 and the IoA Schools Design Guide are also achieved. No adverse impacts are anticipated for neighbouring residents.

5.7 Ground Conditions and Land Contamination

A Desk Study and Preliminary Risk Assessment undertaken by Jomas Associates identifies no significant contaminant sources within the site, which comprises historic school playing fields. Historical mapping confirms the area has remained undeveloped apart from tennis courts and car parking since the 1960s. Overall contamination risk is assessed as low to low/moderate, and no intrusive contamination investigation is required. A watching brief is recommended during groundworks.

5.8 Ecology and Biodiversity

The site comprises mown grassland of low ecological value. The BNG strategy confirms that the development achieves the required 10% biodiversity net gain through planting enhancements, new vegetation and improvements to site structure planting. No statutory or non-statutory ecological designations are affected.

5.9 Sustainability

The development incorporates high-performance modular construction, air-source heat pumps and a 9.56 kWp photovoltaic array. Building fabric U-values significantly exceed Building Regulations, and the combination of Be Lean / Be Clean / Be Green measures achieves a 25.41% reduction in regulated CO₂ emissions relative to the Part L 2021 Target Emission Rate. The scheme fully complies with and exceeds local sustainability and energy policy expectations.

6. Open Space and NPPF 104

Managing Development Delivery Local Plan (2014) Policy TB08 requires that any proposal resulting in the loss of open space, sports or recreational land must demonstrate consistency

with the National Planning Policy Framework (NPPF). The former paragraph 74 is now found at paragraph 104 of the December 2024 NPPF (as amended February 2025). It states:

Existing open space, sports and recreational buildings and land, including playing fields and formal play spaces, should not be built on unless:

- a) an assessment has clearly shown the space to be surplus to requirements; or
- b) the loss is replaced by equivalent or better provision in a suitable location; or
- c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

The Bulmershe proposal consists of a single-storey modular Cognition & Learning (C&L) Resource Base, forming part of Wokingham Borough Council's borough-wide programme to expand in-borough SEND provision. The building would occupy a small area of informal grassed land located between the existing Table Tennis building and adjacent sports courts. This land is not part of the school's marked PE pitches and is not used for formal curriculum sport. As such, it is necessary to demonstrate compliance with both TB08 and NPPF paragraph 104.

Compliance with NPPF Paragraph 104 – Criterion (c)

In this case, the proposal directly satisfies criterion (c), as the educational, social and community benefits clearly outweigh any minor loss of informal open space. The key factors are:

- **Demonstrated educational need:** The C&L Resource Base forms part of the Council's SEND Places Programme, responding to sharply rising demand for specialist provision within mainstream secondary schools.
- **Supporting inclusion locally:** Delivering a specialist base on the Bulmershe campus allows pupils with C&L needs to remain within a mainstream environment while accessing targeted support. This reduces travel distances, improves inclusion and aligns with WBC's policy objective that children should be supported in their local community wherever possible.
- **High community benefit:** Without local specialist capacity, pupils are increasingly placed in out-of-borough provision, incurring higher costs and longer journeys. Providing in-borough capacity offers significant educational, social and economic benefits for children, families and the wider community.

These considerations constitute alternative provision with significantly greater public value than the limited use grassed area currently present on this part of the site.

Additional Material Considerations

Beyond meeting NPPF 104(c), several factors demonstrate that the impact on open space is modest, proportionate and acceptable:

- **No impact on playing pitches:** The land affected lies outside the school's marked PE pitches and outside any timetabled curriculum sports areas. The school retains full pitch capacity to meet its obligations under the Education (School Premises) Regulations.

- No displacement of formal sports use: The area functions as low-intensity general school grounds and is bordered by hard courts and Table Tennis facilities, not by grass pitches. No formal or informal sports markings are affected.
- Provision of enhanced outdoor space: The scheme introduces a secure sensory garden and external learning areas designed specifically for SEND pupils, representing a higher-value, purposeful use of the land compared to its current incidental function.
- Qualitative landscape improvements: New planting, safer circulation routes and inclusive outdoor environments will be delivered as part of the development, improving the setting rather than diminishing it.
- Great weight to school development: NPPF paragraph 100 requires that *great weight* is given to the need to create, expand or alter schools. This is a highly material consideration that strongly supports the proposal.

Policy Compliance Conclusion

Taking all factors into account, the development's substantial educational, social and community benefits clearly outweigh the very minor loss of low-value informal open space. The proposal therefore:

- meets NPPF paragraph 104(c);
- fully complies with Policy TB08; and
- attracts significant positive weight under NPPF paragraph 100.

The development is therefore acceptable in open space terms.

7. Conclusion

The proposal seeks full planning permission for a single-storey modular Cognition & Learning (C&L) Resource Base within the grounds of The Bulmershe School. The development directly responds to Wokingham Borough Council's identified need to expand in-borough SEND provision as part of its wider programme of new and enhanced resource bases. The Design and Access Statement, Transport Statement, Drainage Strategy, Noise Impact Assessment, Desk Study and supporting technical reports demonstrate that the scheme has been carefully designed to integrate into the established school campus while minimising and appropriately mitigating environmental and operational impacts.

The public benefits generated by the proposal are significant. The new facility provides essential specialist accommodation, allowing pupils with cognition and learning needs to be educated locally, reducing the reliance on out-of-borough placements, shortening travel distances and supporting inclusive education within a mainstream setting. The building has been designed in line with WBC's SEND Resource Base model and relevant DfE guidance, offering calm, structured and flexible learning environments that support pupils' sensory and developmental needs. These educational and social benefits attract substantial positive weight in the planning balance.

Environmental and technical considerations have been robustly addressed. The scheme results in the loss of only a very small area of low-value informal grassed space and does not affect any

marked playing fields or curriculum PE areas, meeting the requirements of NPPF paragraph 104(c) and Policy TB08. The Desk Study and Preliminary Risk Assessment confirm a low to low/moderate contamination risk and no significant geo-environmental constraints. The accompanying Drainage Strategy provides a compliant SuDS solution; with noise impacts low, with plant noise limits set in accordance with measured background levels to safeguard neighbouring amenity.

Sustainable design features are embedded throughout the scheme. High-performance modular construction, the use of air-source heat pumps and a roof-mounted 9.56 kWp photovoltaic array reduce operational energy demand and deliver a 25.41% improvement over the Part L 2021 Target Emission Rate. These measures align with local sustainability policies and contribute positively to the Council's climate objectives.

Taking all matters into account, the substantial educational, social and community benefits clearly outweigh the limited and mitigated impacts associated with the development. The proposal accords with the Development Plan when read as a whole, meets the tests of NPPF paragraph 104(c), and benefits from the great weight that national policy requires to be given to the expansion and improvement of schools under NPPF paragraph 100.

The scheme therefore represents a sustainable and well-justified form of development. Accordingly, planning permission should be granted.