
Appeal Decision

Inquiry opened on 5 December 2017

Site visit made on 10 January 2018

by Philip Major BA(Hons) DipTP MRTPI

an Inspector appointed by the Secretary of State

Decision date: 26 February 2018

Appeal Ref: APP/R0335/W/17/3177088

Land south of Foxley Lane, Binfield, Berkshire.

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a failure to give notice within the prescribed period of a decision on an application for outline planning permission.
 - The appeal is made by Willson Developments Ltd against Bracknell Forest Borough Council.
 - The application Ref: 16/01196/OUT, is dated 2 December 2016.
 - The development proposed is an outline application for up to 350 residential dwellings, land for a one form entry primary school, a medical centre including pharmacy (1200m²) a sports pavilion (140m²) open space, landscaping, suitable alternative natural greenspace (SANG) and drainage. Means of access to be considered, all other matters reserved.
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Preliminary Matters

1. As noted in the description of development above, this application has been made in outline, with all matters reserved for future determination except the means of access to the site. The site is located to the west of the main part of Binfield, and to the north-west of Bracknell. Binfield and Bracknell retain separate identities despite being contiguous in places. The site abuts the boundary between Bracknell Forest Borough and Wokingham Borough which runs north to south along its western boundary. There are 2 proposed vehicular access points from Foxley Lane on the northern boundary, and emergency vehicular access from Murrell Hill Lane to the east, with pedestrian/cycle access points at other locations. The application was accompanied by much illustrative material indicating how it would be intended that the site be developed. Part of the proposal involves the provision of suitable alternative natural greenspace (SANG) to mitigate any impacts on the Thames Basin Heaths Special Protection Area (SPA). Some of the SANG is located in the adjacent local authority area of Wokingham and a separate planning permission has already been granted for that use.
2. The inquiry opened on 5 December 2017 and closed on 21 December 2017. The formal accompanied site visit took place on 10 January 2018. Further site inspections were carried out accompanied and unaccompanied before and during the inquiry.
3. Rule 6(6) status was granted to Binfield Parish Council and Binfield Village Protection Society who jointly presented their case at the inquiry. I refer to them as the R6 party hereafter.

Matters of Agreement between the Appellant and the Council

4. It is agreed between the parties that the Council is currently unable to demonstrate a 5 year supply of deliverable housing sites including an agreed 20% buffer¹. There is no agreement, however, on the extent of the shortfall. The Council believes that supply currently stands at around 4 years, whilst the Appellant believes it to be around 3 years². The difference stems from the assessment of each party of what the objectively assessed need (OAN) for housing should be, and the likely delivery rates of some sites. I deal with those matters below. However, in light of the agreed position on the lack of a 5 year supply it is agreed that the tilted balance of paragraph 14 of the National Planning Policy Framework (NPPF) is engaged.
5. Statements of Common Ground (SoCG) on highways and transportation measures were submitted. These set out that the Appellant has agreed the likely transport impacts of the proposal with both Bracknell Forest and Wokingham Borough Councils, and that suitable mitigation has been identified. Such mitigation can be controlled by conditions or S106 obligations, which I deal with below. Local residents continue to have concerns in relation to impacts on the highway system and this is also dealt with later in the decision.
6. In the principle SoCG between the Appellant and the Council a number of other matters are addressed. It is agreed, for example, that flood risk has been adequately considered and that with the implementation of a sustainable drainage strategy the development would not pose a flood risk. It is further agreed that there would be no archaeological impediment to the development, subject to suitable conditions being imposed. Further points of agreement are noted in relation to ground conditions, noise, waste and recycling, and the provision of utilities.

Development Plan

7. The component parts of the development plan for the Borough are agreed, and the list of relevant policies in the main SoCG is clearly set out. The development plan includes saved policies of the Bracknell Forest Local Plan of 2002 (LP), the Bracknell Forest Core Strategy Development Plan Document of 2008 (CS), the Site Allocations Local Plan of 2013 (SALP) and the Binfield Neighbourhood Plan of 2016 (BNP). Not all of those policies identified in the SoCG contribute materially to the determination of this appeal, and I deal with the most relevant policies in the body of the decision below. Policy NRM6 of the Regional Strategy for the South East was saved when the majority of the strategy was revoked. This policy is relevant in that it deals with development within 5km of the Thames Basin Heaths Special Protection Area (SPA).

Decision

8. The appeal is dismissed and planning permission for up to 350 residential dwellings, land for a one form entry primary school, a medical centre including pharmacy (1200m²) a sports pavilion (140m²) open space, landscaping, suitable alternative natural greenspace (SANG) and drainage. Means of access to be considered, all other matters reserved, is refused.

¹ Inquiry Documents 16 and 44

² I deliberately use these approximate figures as they accurately reflect the respective estimates of the parties based on their professional assessments and judgements.

Main Issues

9. The main determinative issues in the appeal are:
- (a) The assessment of the housing requirement (OAN) and the shortfall in the 5 year housing land supply position;
 - (b) The impact of the proposal on the character and appearance of the surrounding area;
 - (c) Whether the proposed development would be in a suitable location in relation to local services;
 - (d) The impact of the proposal on traffic and transport and the lanes adjacent to the site;
 - (e) Whether the development would significantly impact on the open gap between Binfield/Bracknell and Wokingham;
 - (f) Whether adequate attention has been paid to the likely impacts of the development on air quality.

Reasons

Housing Requirement and Supply

10. The main parties to the appeal agree that the housing need set out in the CS, which was adopted prior to the publication of the NPPF, does not represent the objectively assessed housing need (OAN). The requirement set out in the CS is therefore not NPPF compliant. As set out above, the parties disagree on the current OAN.
11. There is, as yet, no standardised method for calculating OAN. Following the current Planning Practice Guidance (PPG) means that OAN must support demographic growth, economic growth, and seek to address market signals as well as addressing affordable housing need. Both parties have followed the PPG and there is agreement on the appropriate housing market area (HMA). There is also broad agreement on matters such as demographic projections and that any difference in this respect is not material to the respective cases on OAN. The crucial difference between the parties relates to economic growth considerations.
12. It is agreed that demographic projections must be adjusted upwards to ensure that sufficient housing is provided to cater for economic growth. Even at that point there is much agreement. For example there is agreement on jobs growth, commuting ratio and (largely) double jobbing, as well as the assumptions needed to address household formation suppression. The single main disagreement centres on economic activity (or participation) rates. The outcome of the disagreement is that the OAN according to the Appellant should be around 695 or more dwellings per annum (dpa) whilst the Council indicate an OAN of about 633 dpa³.
13. The difference stems from the forecasting data utilised in calculating the OAN, which have slight differences. The Appellant uses data from the Office for Budget Responsibility (OBR), and the Council a combination of Experian, Cambridge Econometrics and Oxford Economics. Both approaches have been supported at separate appeals in other locations. The Appellant has provided

³ Again, I use approximations because it is impossible to be completely accurate in these predictions.

good reasons why the OBR approach is robust, including its greater caution about the propensity for older people to stay in work for longer (the increasing pension age plays a part here) and the fact that OBR data is used by the Government in the activities of the State. In addition I accept that the nature of much of the employment in the HMA (such as ICT) is likely to attract younger workers. On the other hand the Council's approach uses a variety of data from respected forecasting houses as employed in the latest Strategic Housing Market Assessment (SHMA) and, although it can be more volatile, the Council has 'triangulated'⁴ the data sources. This enables an informed judgement to be reached on the likely future activity rates. Albeit that the SHMA has not been subject to formal examination the data used cannot be discounted on that basis alone.

14. I have been invited to determine which approach is preferable. However, I am not sure that is necessary or helpful. Both approaches have been endorsed in other cases and only time would tell which was the correct one. On a pragmatic basis I tend towards the robust and tested data from the OBR, but I would not entirely discount the Council's results. On that basis I am prepared to accept that the OAN is likely to be somewhat higher than the Council suggest, and rather closer to the Appellant's calculation but not necessarily as high as 695 dpa or more. Hence it is apparent that the current supply will be somewhere between the 3 and 4 years mark (the levels put forward by the parties).
15. The supply itself is agreed in most instances. Dispute in supply over 5 years centres around a small number of developments. The difference amounts to about 600 houses. I deal with them in turn.
16. Amen Corner North. This site is in the process of being built. There are a number of dwellings clearly visible but as yet none occupied. The developer has indicated a target in the current year of 4 dwellings sold (to legal completion). Given the number of dwellings already on site that may be exceeded, but not by much. In addition I accept that future year completions of 100 dpa seem optimistic for a single outlet site, particularly in an area with multiple other outlets in existence or with planning permission. Given the likely buoyant market in the Bracknell area a rate of more than 50 (the Appellant's estimate) may be achieved. Even so I discount some dwellings from the Council's predicted supply. It would be fair to discount 100 dwellings.
17. Royal Winchester House in Bracknell Town Centre is predicted by both parties to come on stream in the year 2019 to 2020. It is a large block of apartments. Clearly there is considerable early investment in such a large block and it would be expected that the developer would seek a return as quickly as possible. Given that the block is expected to provide 'high end' accommodation the delivery may be slower, but the average rate of delivery used by the Appellant seems to me to be pessimistic and not geared towards a development of this nature. Even so the rate of delivery of the scheme in this 5 year period may be less than the Council predicts because of the nature of the accommodation provided. Again, in my judgement it is fair to discount 100 dwellings from the Council's calculation.

⁴ Triangulation was explained at the inquiry to be not just averaging, but the application of professional judgement to the data sets.

18. Amber House and Northgate House is a development by Thames Valley Housing. It is likely to be completed as a single development within the current 5 year housing period. This is confirmed by email of 6 December 2017 by the head of residential development at the company. This is the best evidence I have for this location and I do not discount any of the dwellings from the supply assessed by the Council.
19. Development at Amen Corner South is not contested in relation to timescales, but the rate of delivery differs. Given its proximity to Amen Corner North there may be an impact on the delivery at both sites when this development comes on stream. Nonetheless the average rate predicted by the Appellant may prove too low, whilst the Council's rate may prove to be too optimistic. A sensible judgement would fall somewhere between the 2 and I therefore discount the Council's supply here by 40 dwellings to account for lower supply in years 4 and 5.
20. The final site of any significance relates to the Warfield 3 area of land, where the difference between the parties is the supply of 50 sites. I am informed that the land is subject to multiple ownerships and that there is no equalisation agreement in place to cover equitable returns to all parties. That does indicate that there may be a delay in bringing forward the site to development, but as the Council only predict delivery in year 5 it does not seem improbable that the scheme could have begun by then. I do not discount any of the calculated supply here.
21. Whilst there is also disagreement about the inclusion of 28 windfall units over the first 2 years of the 5 year supply this number is so small as to make no practical difference in an area which is inherently uncertain.
22. Taking these matters together it is my judgement that in relation to housing requirement the OAN is likely to be something approaching that calculated by the Appellant, but I do not think it would be helpful to try to be too accurate in an inherently uncertain area of prediction. To that it is necessary to add the shortfall in supply which has occurred (to be cleared in 5 years) and a 20% buffer in accordance with the NPPF. I do not think that it would be reasonable to aggregate the shortfall as far back as 2006 given that policy was very different then. The shortfall since 2013 is more appropriate. On the supply side, given the discussion above, I consider that the Council can demonstrate a 5 year supply in the region of 3940 dwellings. It follows that this falls somewhere between the 3 years estimated by the Appellant and the 4 years estimated by the Council. My judgements simply bring the figures presented by the parties a little closer together.
23. As I have already noted, there is in any case no dispute that there is a housing shortfall over 5 years and that the tilted balance of NPPF paragraph 14 is engaged. Of importance, though, is the fact that the Council has demonstrated an improving trend in supply and clearly shown that it is committed to addressing the need for housing. The real issue here is the weight which attaches to the shortfall when the final balance is undertaken.

Character and Appearance

24. As a precursor to the consideration of the impact of the proposed development on the landscape I deal first with the matter of 'valued landscape' in terms of the national policy set out in paragraph 109 of the NPPF. This was the subject

of considerable debate at the inquiry. It is clear from case law that in order to be found to be valued a landscape must exhibit features and characteristics which set it apart from the ordinary.

25. The landscape of which the appeal site is a part is not designated in any way for its scenic quality. Nonetheless it has attractive characteristics. I was struck by the sense that it is wholly rural whilst being on the edge of the settlement. This stems from the levels of enclosure afforded by the tree and hedgerow cover surrounding and within the site, giving the undulating topography a bucolic appearance when seen from surrounding public viewpoints. The retention of much of the hedgerow pattern across the site is a significant feature and does retain some sense of historic field patterns (albeit that some hedgerows have been removed over time). Whilst there is a distant hum from the nearby A329(M) this does not intrude to any significant degree. Views into the site are from the public right of way to the south, Murrell Hill Lane to the east, Foxley Lane to the north, and less significantly from Binfield Road some distance to the west.
26. From none of these locations is there a strong sense that there is a significant urban area nearby. Binfield is largely screened by vegetation but even where apparent it is manifested in low density and relatively low key buildings. The urban nature of the settlement only becomes apparent when the site has been left behind. This effect is emphasised by the fact that Murrell Hill and Foxley Lanes are themselves tree lined and typical of lanes which would be found in rural locations. In my judgement it is appropriate to regard the site as profoundly rural in its overall character.
27. With that in mind I note that public access to the site is not formally available, though I heard at the inquiry that there is tolerance of local residents using it responsibly for access and recreation. But that access could be removed at any time and as such the fact that local residents use the site to some degree cannot weigh strongly in favour of any judgement on whether the site should be regarded as part of a valued landscape.
28. Even so, the attractive and available views over the land, the presence of woodland, trees and hedgerows, rolling topography and fieldscape, the walks adjacent to the land along country lanes which are designated as part of a Ramblers Route, the absence of built development, and the perception of the land as quintessential English countryside, provide significant reasons to enable me to make the judgement that this location is rightly assessed as a valued landscape by the local population. The landscape has sufficient features and characteristics of quality which set it above the ordinary. I accept that it should be regarded as valued in the terms set out in the NPPF.
29. I turn then to the impact of the proposed development on the character and appearance of the landscape. I have already noted above some of the important characteristics of the landscape here – notably the well vegetated rolling topography and the presence of hedgerows delineating fields which are of variable size. There are also nearby areas of ancient woodland, whilst the site contains many veteran trees. The several landscape character assessments carried out over the years identify similar characteristics⁵. These assessments were performed for differing reasons, and at variable scale, but nonetheless the majority of the studies illustrate a theme that is discernible, as

⁵ See inquiry document 29

is clearly seen, for example, in the 2015 Landscape Character Assessment⁶. This includes the blocks of ancient woodland linked by hedgerows, the field pattern, views over open land, the topography, and the contrast with the urban area.

30. In an area wider than the appeal site alone the location has been identified as having the potential for some development, a figure of 30% overall being cited in the 2010 Landscape Capacity Study⁷. Some of that capacity has now been taken up by the development at Amen Corner North, and I do not seek to suggest that development there should rule it out elsewhere in the relevant area (Area 4:A2 of the study). What is important, as with any application or appeal, is that a judgement is made based upon the particular proposal, with landscape studies of whatever scale or purpose being used to inform and assist in the process of judgement.
31. In general the character of the area which includes the appeal site is identified as being of moderate or moderate to high sensitivity (where such a judgement is made at all). I agree that the sensitivity lies towards the higher end of the spectrum because of the features identified above.
32. In this instance the proposed development would be located on a sensitive part of the local landscape. Development would be largely on rising ground formed by the side of a shallow valley. It would interrupt the rural character which defines this area to the west of Binfield, especially given the extent of proposed built development. This would be at odds with the part arable and part pastoral character which currently exists. Although I accept that the indicated development scheme would have the potential to retain much of the hedgerow and tree cover (as well as planting more) it would, in my judgement, be impossible to wholly mitigate the scale and extent of the development. Put simply there would be buildings in place of countryside which would be impossible to hide or disguise.
33. The character of the landscape would also be changed alongside the lanes to the north and east. Foxley Lane has no openings other than small gateways between Murrell Hill Lane and the western extent of the appeal site. The proposal would involve the construction of 2 relatively wide vehicular access points in locations where there are presently mature, if somewhat unkempt, hedgerows. These access points would negatively affect the rural ambience imparted by the vegetated site margins, the more so as it is likely that existing vegetation would have to be kept trimmed to maintain adequate visibility splays. Along Murrell Hill Lane itself there would be some impact where the emergency access and pedestrian/cycle access points would be created. But these would be narrower and have a less significant impact on the peripheral vegetation of the appeal site, and hence have only a minor effect on the landscape character.
34. Taking all of these factors together it is my judgement that the proposed development would have a significant and detrimental impact on the character of the local landscape.
35. In visual terms the appeal site is most apparent from the gateways which afford visibility into it along Murrell Hill Lane, and from the public footpath to

⁶ CD 7/6

⁷ CD 7/5

the south. These routes (reiterating that Murrell Hill Lane is part of a Ramblers Route) are likely to be used by recreational walkers. Evidence at the inquiry, and my own observations on site, showed this to be the case. Recreational walkers are rightly regarded as highly sensitive to development since their reason for being in that location is largely to enjoy the landscape.

36. From the south the development would be visually inescapable when approached along the public footpath. It would be seen rising up the valley side amongst the trees and hedgerows retained or planted. It would be all but impossible to remove the sense that the landscape of the appeal site was an urban one. Whilst I acknowledge that the appeal proposals at reserved matters stage may well include more planting, and management of retained vegetation, I cannot agree that the scheme would bring any visual landscape benefits. It would be inevitable that a visually appealing area of attractive countryside would be seen as an urban extension, with buildings and infrastructure readily discernible.
37. Similarly the views across the site from the gateways along Murrell Hill Lane would be radically altered in that the open and extensive views across the valley landscape would be largely lost to housing and ancillary development. The presence of retained trees and hedgerows would be scant consolation for the loss of the current attractive vista.
38. The view from Binfield Road, some distance to the west, would include glimpses of development against the valley side, but at a distance to impart no more than minor visual intrusion. In any event it is unlikely that there would be a significant number of people walking along that road. The motorists on Binfield Road, and indeed Foxley Lane, are less sensitive to development and the proposal would not be significantly harmful to the experience of those road users.
39. Taking this issue in the round it is my judgement that the landscape can rightly be regarded as valued. Although studies show that in an overall context there may be scope for some development hereabouts, I consider the appeal site to be of high sensitivity to development proposals. The development would impart adverse effects of a major magnitude resulting in significant harm to landscape character. Notwithstanding the clear indication that much vegetation would be retained and supplemented on and around the site, I am also of the view that there would be a major adverse visual change resulting in significant visual harm to the locality as experienced by sensitive receptors. My overall conclusion on this issue is that there would be serious harm to the character and appearance of the surrounding area and conflict with saved LP Policies EN8, EN20 and H5. Together, amongst other things, these policies seek to ensure that development is not unacceptably harmful to the landscape. Although the policies are not wholly in accordance with the NPPF they retain significant weight as a result of their overarching objectives.

Location

40. Binfield has a range of services suitable for meeting the day to day needs of its population. I have been provided with a table indicating the walking distance to the site from the majority of these services. There is no material disagreement about these distances or the walking times they would entail,

those walking times having supplemented by the R6 party to account for the centre and furthest distance within the site⁸.

41. What the table shows, for example, is that the Co-operative supermarket in the centre of Binfield would be a walk of about 12 minutes from the site entrance, to about 20 minutes from the furthest part of the residential development. There are in fact few services which fall materially below that range, and some (such as the Binfield Club and memorial hall and Blue Mountain Community Centre) are significantly further away. Although the guidelines for acceptable walking distances are just that, guidelines, it seems to me that opportunities to access services on foot are limited at this site. I would not expect the majority of residents to walk to local services.
42. Furthermore there is no proposal to improve or supplement existing public transport. The closest bus stops to the appeal site which serve the local route to Bracknell are close to the Terrace Road South and St Marks Road intersection with Foxley Lane. This may be convenient enough for residents on part of the site but is a walk of 10 to 15 minutes for others. Nonetheless I do not dispute that some residents would be attracted to this service (the 150 runs at half hourly intervals) for access to Bracknell, where train services can be found. A similar situation exists in relation to the fast bus service to and from Reading, which follows London Road to the south. Here though the nearest bus stops are further away, necessitating a walk which I estimate to be about 10 minutes as a minimum. Hence, although I accept that there would be some residents willing and able to use local bus services I consider that it would be a low proportion of residents. It seems to me that the opportunity to substitute walking or buses in place of car use is limited on this site. I find the suggestion that bus services would be improved as a result of CIL contributions to be unsubstantiated.
43. Set against the fact that services and bus routes are not likely to be particularly attractive to residents of the development is the fact that a Travel Plan is proposed and included within the S106 obligation I deal with below. This would no doubt have some influence in determining the mode of transport used by some residents. However I am not persuaded that it would be likely to have a significant impact on mode share.
44. I do, though, accept that cycling may be an attractive alternative to the use of the private car. Murrell Hill Lane gives access along a lightly trafficked no through road to the cycle lane facilities on London Road. That in turn means that access is possible to employment areas close to Bracknell, and to Bracknell station. Wokingham would also be within reasonably comfortable range. It seems to me, therefore, that the most likely alternative to the use of the private car at this development would be by cycle.
45. The appeal proposals include provision for a medical centre which is required to replace the current outdated facilities in Binfield. Clearly access to a new medical centre on site would be easy enough on foot for residents of the development. But a good proportion of the remainder of Binfield residents would then be further from the medical centre given its current location. Provision on this site would therefore neither weigh in favour or against the proposal in locational terms, though it is supported in principle by Policy CF1 of the BLP.

⁸ Inquiry document 64

46. During the inquiry my attention was drawn to decisions and judgements which relate to the location of other developments, such as the Blue Mountain site, which are said to be no better located than this appeal site in relation to services and facilities. It is apparent that I have not had the benefit of seeing or hearing the evidence in those cases. Consequently it is difficult to reach a conclusion that this site is locationally better or worse than any other. In any event it is not the relationship of any site with a single service (such as a bus route) or small range of services, which is crucial. To my mind the site must be judged against the overall dispersal of day to day facilities which residents of a site may seek to utilise. In other words each case is bound to have a different relationship with its surroundings and there can be no direct read across from one to another. My judgement concerns the appeal site only.
47. Taken overall I am not persuaded that the appeal site is a location which has significant advantages in relation to its proximity to, or accessibility of, local services. It seems to me that the development would be unlikely to provide real and lasting alternatives to the use of a private car, with the single exception of the potential for cycle trips. That single exception does not make the site a good one in locational terms. Indeed in my judgement it is not. As a result there is conflict with saved LP Policy M8, CS Policies CS1 and CS2, and BLP Policy TC3. These policies together seek to facilitate the use of transport other than the private car and to ensure development is located where that is a significant consideration. The policies are generally consistent with the objectives of the NPPF in this respect.

Traffic and Transport and the Lanes

48. The technical aspects of the impact of the proposal on highways and transport matters have been agreed between the relevant professional parties. The agreements are included in SoCGs noted at the beginning of this decision. I have no reason to disagree with the expert assessments carried out. I accept that in general terms, and in relation to the impact of traffic on the wider highway network, residual cumulative impacts would not be severe.
49. That said, local residents continue to have concerns about the effect of the development on the local road network. This is a matter to which I paid particular attention at my site visits. Foxley Lane is clearly used as a short cut, or rat-run, to avoid the crossroads in the centre of Binfield and to shorten the journey to and from Bracknell. The lane is largely unlit and relatively narrow. For most of its length it has no footways. I share the concern that increasing traffic on this lane would be likely to increase the hazard for any pedestrians following the Ramblers Route which follows its course. During the periods when the Ramblers Route is most likely to be in use (weekends and clement weather) there would no doubt be traffic generated from the proposed development which would have the potential to conflict with pedestrian use of the lane. Clearly there is scope for part of the Ramblers Route to be within the site, and this may well be safer than the current situation. But not all of the route could be so routed; there would still be a section on Foxley Lane without footways. I am also not persuaded that the proposed widening of Foxley Lane would not result in it being more attractive as a short cut, thereby increasing traffic use along it.
50. I do accept that the highway network has the capacity, with the agreed mitigation, to cater for the likely increases in traffic resulting from the

development, but I am not wholly convinced that this would be without risk. Local residents have a valid concern which is not completely addressed in the proposals and which in my judgement militates against the proposal to some degree. As a result I do not consider that the proposal is in complete accordance with saved LP Policy M4 or CS Policy CS24(iv). These policies seek to ensure that development does not compromise highway safety.

51. Impact on the character of the lanes is a separate point to the issue of landscape impact generally. Concerns have been expressed in relation to the impact of the proposal on the character of both Foxley and Murrell Hill Lanes. As I have noted above, both retain the character of rural lanes. Foxley Lane would in essence retain much of that character, though its widening by about 0.5m and the installation of a short stretch of footway towards its eastern end would have some impact. However, I do not consider that the impact would be so unacceptable as to cause significant harm to the character of the lane.
52. Murrell Hill Lane is different in being a no through road, with little traffic. Its rural ambience is stronger than that of Foxley Lane. The proposed improvements, including lighting, additional street furniture, and bollards, would alter its character. This is particularly so in the case of lighting. Notwithstanding that columns would be relatively low and that the intensity of lighting could be managed, the result would be a change in character. The change would be from an unlit rural lane to a semi-urban street. The current rustic amenity of the lane would be irretrievably lost, to its detriment. I realise that the improvements are designed to assist the use of the lane by pedestrians and cyclists in particular, but it seems to me that the changes proposed would detract from its current attractive and undeveloped nature. Murrell Hill Lane is identified as a cycleway in the BNP and included in its map of historic footpaths and bridleways. As set out above I do not consider that the improvements proposed would enhance the cycleway, and as such there is conflict with BNP Policy TC1.1.
53. Overall I consider that there would be likely to be some harm to pedestrian safety and some harm to the character of Murrell Hill Lane. Whilst the impacts could not reasonably be described as severe they nonetheless militate against the proposal to a degree and result in conflict with the development plan.

Bracknell to Wokingham Gap

54. The gap between Bracknell and Wokingham is described in the CS as a strategic gap, though it is not defined by reference to detailed boundaries. Policy CS9 seeks to prevent development in these gaps that would harm the physical and visual separation of settlements. The appeal site lies between Bracknell/Binfield and Wokingham in the broad location identified in the CS. It is therefore correct to regard the appeal site as being within that gap. The boundary between Bracknell Forest and Wokingham Borough Council areas bisects the gap but it would be incorrect to see the area within each local authority area as discrete gaps. The gap as a whole serves the same functional purpose of separating settlements.
55. Wokingham is not readily apparent from any point in the gap, largely because the A329(M) intervenes close to the edge of the town. The gap is rural in nature and is experienced as a tract of countryside with limited scattered development, save for the Amen Corner North development which was excluded from the gap as a major location for growth. I saw from my site

visits that the appeal development would be visible to a degree from the west (within the gap). The edge of Binfield is currently softened by vegetation and topography such that there is little impression of the settlement from the west. It is only further south that the edge of Bracknell becomes apparent, this being the narrowest part of the gap.

56. Even were the appeal proposals to go ahead there would be a significant area of open land between Binfield/Bracknell and Wokingham. Although it would be possible to perceive a narrowing of the gap from points along Foxley Lane, from Murrell Hill Lane, and from the public footpath to the south, a significant area of land would remain open. Much of that land would be in use as SANG either in connection with this proposal or the Amen Corner North development, and hence would be unlikely to be developed. In effect, areas of SANG would protect much of the gap.
57. In terms of Policy CS9 there would be some intrusion into the gap, but the perception of the separation of settlements would remain. Hence, although there would be conflict with this policy the harm to the physical and visual separation between Bracknell and Wokingham would be limited. In isolation I do not regard this as a determinative matter in the decision.

Air Quality

58. Core Strategy Policy CS 14 deals with the Thames Basin Heaths Special Protection Area. This is a matter which falls to be examined because the site is within 5km of the SPA. The Council does not allege that the proposal would have any significant effect on the integrity of the SPA and there is no doubt here that the SANG proposed follows the appropriate policies and guidance for such provision in relation to the SPA. Natural England has not raised any concerns. The principle concern, as explained by the R6 Party, is that insufficient attention has been paid to the impacts on air quality by road traffic following the *Wealden* judgement⁹ so that it cannot be shown that the proposal would have no significant effect on the integrity of the SPA.
59. *Wealden* is concerned with the cumulative impact of developments on the Ashdown Forest Special Area of Conservation (SAC) a protected site. In that case advice from Natural England had been given to each relevant Authority separately but the judgement found that notwithstanding that advice, it is necessary to consider the cumulative effect of extra traffic on air quality in the SAC. The matter was essentially concerned with the preparation of development plan documents in neighbouring local authority areas, and how potential developments in the future would, in combination, impact on the air quality of the SAC. On the face of it therefore, there are certainly some differences between that case and this.
60. The only substantive evidence I have in this case is from the Appellant. That evidence provides information of the likely traffic from the development which would travel on roads adjacent to and through the SPA. The assessment shows that such traffic would be very minor in terms of vehicle trips – far below the 1000 average annual daily traffic (AADT) increase which would trigger the possibility of an appropriate assessment. Modelling shows some 49 trips on the A3095 and 22 trips on the A322, these being the roads of concern. Other

⁹ *Wealden District Council v SoS Communities and Local Government*, *Lewes District Council*, *South Downs National Park Authority* & *Natural England*.

potential trigger points are also out of scope with this development. Furthermore the trips added to the network by the development fall within the existing annual variation of total trips on these roads.

61. It is also clear from the evidence of the Appellant that the predicted nitrogen deposition on the immediate roadside of the 2 roads of concern falls well below the 1% significance threshold beyond which further assessment would be required, the maximum prediction being (0.101%). At that level potential impacts can be screened out. It is also notable that the deposition is at its maximum at the roadside and that the potential impact with distance into the SPA would reduce significantly.
62. The *Wealden* judgement concerned development plans and therefore potential development impacts over many years. That is different to this case. In any event *Wealden* indicates that when specific impacts are known to be very low indeed, or are likely to be such, these can properly be ignored. It seems to me that this is such a case. The predicted impacts of traffic from the appeal site on the air quality of the SPA are very low indeed. In addition the Appellant has presented evidence based on the suitability of the roadsides in question as habitat for the protected species (Annex 1 birds). The majority is deemed unsuitable for those birds. I am also informed that studies elsewhere predict a reduction in nitrogen oxide emissions in the future as a result of improvements in technology.
63. The R6 case also advances the potential for cumulative impacts with other developments. Whilst other development is clearly coming forward as shown on the map provided¹⁰, I have no evidence at all of any contribution to nitrogen emissions in the SPA from any of those sites. There would be many thousands of dwellings built over time, and industrial premises developed, but it is too simplistic to suggest that all of those developments should be considered cumulatively as of now. It is entirely possible given the improvements in technology and the well known push towards electric vehicles that air quality should in fact improve over time. Given that the appeal site has a very small predicted impact indeed there is no reason to suppose that other developments would have anything other than a small impact. Realistically I am satisfied that it has been shown that the thresholds for further assessment are not likely to be approached, let alone breached.
64. Taking these matters together it seems to me that it has been clearly demonstrated that the proposed development would not result in a decline in air quality beyond a potential miniscule level along the immediate margin of the SPA roads. I have no evidence which suggests that this proposal, either singly or in combination with other developments, would result in air quality thresholds or traffic thresholds being breached. Indeed the evidence is entirely the other way; that any impact would be so small as to be capable of being screened out.
65. For these reasons I am satisfied that the Appellant has carried out thorough studies and shown that air quality matters have been properly investigated. The R6 Party, however, has provided no substantive evidence to support the assertion that the assessment of air quality impacts has been inadequate. I find that there is no likelihood of the proposal having any significant impact on the integrity of the SPA either alone or in combination with other plans or

¹⁰ Inquiry document 63

projects. Hence, as set out in the Conservation of Habitats and Species Regulations 2017, an appropriate assessment is not required. The matter of air quality impacts does not weigh against the proposal. I find no conflict with saved LP Policy EN3 or CS Policy CS14, which seek to protect the integrity of SPAs amongst other things.

Other Matters

66. I deal here with other matters which I do not identify as main issues but are nonetheless relevant to the case and reflect the evidence that I heard.
67. **Heritage.** It is agreed by the parties that the only designated heritage asset which may be affected by the proposal is White House Farm Cottage, a grade II listed building to the north-east of the site close to the junction of Murrell Hill Lane with Foxley Lane. Old mapping shows the building as having been associated with at least part of the land forming the appeal site. There would have been a clear functional and visual link between the two. However, that has changed over time.
68. My site inspection demonstrated that the listed building has been severed from its former land and now stands in a relatively (by the standards of surrounding properties) modest garden. The garden is walled and the appeal site is little visible from the house or its garden. The setting of the house is clearly constrained by its boundary features and the surrounding buildings. In my judgement the setting as it stands can be correctly assessed as being its garden, with the added historical association entwined with the development of other buildings at this location. Other than by reference to historic mapping and records I do not see that the building retains any links to its former association with the appeal site. Certainly the setting within which the asset is now experienced seems to me to exclude the appeal site. From the reverse viewpoint it is notable that the listed building is hardly visible from the appeal site, only the upper part of the roof and chimneys being partly seen. In my judgement, therefore, the proposed development would preserve the setting of White House Farm Cottage.
69. The other nearby buildings in this cluster, including The White House, The Barn and White House Farm, are cited as non-designated heritage assets. All have charm and presence and serve to illustrate the development of this part of Binfield, but none is of such significance, either individually or collectively, that development on the appeal site would be harmful to the appreciation of them as non-designated assets. Their relationship to each other and the wider area as a group of buildings which developed in proximity to one another over time would remain as strong with the development as without it.
70. In relation to archaeological resources this is a matter which could be adequately safeguarded by the imposition of appropriate conditions. There are therefore no impediments to the proposed development in relation to designated or undesignated heritage assets. There is no conflict with BNP Policy BF2.
71. **Arboricultural Matters.** The appeal site does not include any ancient woodland, though the appeal scheme incorporates the SANG land within Wokingham Borough which does include an area of ancient woodland. There are also a number of veteran trees scattered around the appeal site. I do not have definitive proposals for the scheme before me, but I am conscious that

the illustrative layout seeks to retain the maximum number of trees and hedgerows. That would be expected, especially as the site is now covered by an area Tree Preservation Order. The loss of trees is low in overall terms.

72. I do not share the concerns expressed by some that the ancient woodland in the SANG would be degraded if the development proceeded. Indeed I accept that there are opportunities for better management. The comparison with Farley Copse is not realistic since that woodland is almost entirely surrounded by development, unlike here. The illustrative material indicates that national advice in relation to buffer distances to ancient woodland (recently changed twice) can be met.
73. **Best and Most Versatile (BMV) Land.** A proportion of the appeal site (9.1Ha of the total) has been assessed as being either Grade 2 or Grade 3A agricultural land. The NPPF indicates that it is necessary to take into account the economic and other benefits of such land. In this case the area of land concerned is below the threshold which would require consultation with Natural England. It has also been shown that the BMV on site could not be managed in a coherent manner because of its distribution. Furthermore the 9.1Ha concerned is a minor part of the total in Bracknell Forest (some 0.4%). Much of the land is currently used for horse grazing and is therefore of limited economic benefit. For these reasons the loss of this small area of BMV land should not weigh against the proposed development.
74. **Impact on adjoining occupants.** Nearby residents have identified concerns in relation to the effect on their own properties and living conditions. This is particularly pertinent to the residents of the dwellings adjacent to the north-eastern corner of the site. I was able to visit all of those properties. It is readily apparent that the development would be visible from much of the gardens of those houses, and it is unsurprising that the residents prize the views over the attractive open countryside. It would also be possible to see the development, to varying degrees, from within the houses.
75. It is well known, though, that there is no right to a view, and the crucial test is whether the proposed development would make the affected dwellings unacceptable places to live. This might occur if, for example, development was of sufficient scale, bulk, or proximity so as to unacceptably impact on living conditions by being over dominant and intrusive to normal day to day living. I do not consider that this would be the case here. Albeit that the proposal is in outline form I am satisfied that there is plenty of scope to design out potential difficulties at the reserved matters stage. The proposed widening of Foxley Lane is also unlikely to cause any difficulties of access to these dwellings. In my judgement therefore there would be no unacceptably harmful impact on the living conditions of residents who live nearby.
76. **Ecological Matters.** Some comments have been made in relation to on-site ecological matters. This is not something which has caused the Council concern, and I am satisfied that the information made available indicates that any necessary mitigation can be dealt with directly or by the imposition of appropriate conditions.

Benefits of the Scheme

77. The asserted benefits of the scheme are well articulated in the evidence of the Appellant. I deal with them in terms of the 3 strands of sustainable development as set out in the NPPF.

78. **Social Role.** Quite apart from assisting in addressing the shortage of housing generally the scheme would provide 88 affordable dwellings in an area which has an acute need for such accommodation. There has been a very low rate of affordable housing provision over the past few years and the Council is struggling to cope with demand. It has a very large backlog. As a result the 88 affordable dwellings would be a significant benefit of the development.
79. The provision of housing generally is also of benefit, but I bear in mind here that in contrast to previous years of poor delivery the Council's evidence is that it is seeking urgently to address its housing shortfall. As pointed out at the inquiry the delivery trajectory is getting better and I accept that the Council is committed to addressing its housing needs. Even so the provision of housing is a benefit of some weight, albeit not of the same significance as the affordable housing provision.
80. The above matters follow the NPPF exhortation to provide housing, including affordable housing.
81. The social role would also be served by the provision of the medical centre, should it eventually be provided here. However there is a possibility that an alternative site would be available and there is no certainty that the medical centre would be built on this site even were the development to proceed. This situation is made more uncertain by the timing of development in relation to funding. On the whole I do not accept that this matter can attract much weight. A similar situation exists with regard to the school site because there is simply no certainty that it would ever be required.
82. I do not accept that the proposal is in an accessible location as argued by the Appellant and as a result do not consider that this development would offer social benefits by being situated in a location with good access to services and facilities. Good design is an expectation of the NPPF and not peculiar to this proposal. It cannot, per se, be regarded as a benefit.
83. I accept that the development would provide open space for recreational purposes, which would be of social benefit not only to the residents of the development but to the wider population. This is a minor benefit.
84. **Environmental Role.** The development would provide SANG alongside the wider open space. But that is not, in itself, a benefit of the scheme. It is mitigation for the impact of the scheme. That said I accept that the SANG would be considerably greater in extent than required by guidance, and would provide public access to parts of the countryside not currently accessible. This 'extra' provision can be regarded as a minor benefit, albeit one which is a by-product of a requirement of the development itself. The development would be designed to mitigate ecological impacts but such mitigation would only be required because of the development.
85. As I have made clear above, I do not consider that the proposal would be acceptable in terms of its impact on the character and appearance of the locality, but would be significantly harmful. The suggestion that the development would be satisfactorily assimilated into the landscape is not a judgement with which I concur.
86. **Economic Role.** There would be undoubted economic benefits flowing from the proposed development. These have been documented by the Appellant and include economic output over the construction and occupation phases, direct and indirect jobs, new homes bonus and council tax payments, business

rates, and the spending of the new residents. Jobs at the new medical centre and possible school should not be included since they are not certain to be located here.

Overall Balance

87. I summarise here the considerations which lead me to my final decision.

Benefits of the scheme.

- Affordable housing provision is a benefit which carries significant weight in the balance. There is a proven and urgent need for such accommodation. The provision accords with the relevant policies of the development plan (saved LP Policy H8 and CS Policy CS17) and in addition is supported by NPPF policy on housing provision.
- The provision of open market housing is also a factor of some weight. However, the significance of the provision is tempered by the fact that the Council is moving towards being able to provide a 5 year housing land supply. I do not accept that supply is as poor as suggested and therefore this lessens the weight given to the failure to demonstrate a current 5 year supply. The provision of housing is strongly supported by the NPPF.
- There would be minor benefit from the addition of open space beyond what would be required as a direct result of the development. The provision accords with the development plan and is also supported by the NPPF.
- Very little weight attaches to the potential for the provision of a medical centre or school because of the uncertainty in relation to their eventual provision.

Harm caused by the scheme

- I have found that there would be significant harm to the character and appearance of the surrounding landscape, which I judge to have sufficient qualities to be deemed to be valuable. There is conflict with the development plan here (EN8, EN20 and H5) and the proposal runs counter to the NPPF objective to protect and enhance valued landscapes. The harm to landscape attracts significant weight.
- The location of the development would, in my judgement, be unacceptable and would not provide sufficient encouragement to residents such that it would be likely to reduce the propensity to use private motor vehicles. This carries significant weight and conflicts with the development plan (M8, CS1, CS2, TC3). The principles of the NPPF would not be met as the development would not be located where the use of sustainable transport modes can be maximised.
- There would be harm to the character of the adjacent lanes (especially Murrell Hill Lane) which would be of moderate weight. This would also be contrary to the development plan (TC1.1) and would not accord with the NPPF objective to limit the effects of light pollution on local amenity.
- I am satisfied that it has been demonstrated that the highway safety implications of the proposal have not been wholly addressed, with reference to the use of lanes as a Ramblers Route. This carries minor to moderate weight and is in conflict with the development plan (M4, CS24).

I do not apportion any weight as a result of conflict with the NPPF since I cannot find that impact would be severe.

88. As I have set out above, there are a number of other matters on which I heard evidence which I do not consider to be determinative. These relate to heritage assets, the protection of veteran trees, the impact on the gap between Bracknell/Binfield and Wokingham, air quality impact, the potential provision of a medical centre and school, the living conditions of neighbours, and ecological matters.

Conditions and Obligations

89. The parties agreed a draft list of planning conditions. In the event that I had determined to allow the appeal these would form the basis for appropriate conditions to control reserved matters and other facets of the proposal.
90. The S106 Obligations submitted deal with other elements of the proposal. I am satisfied on the basis of the information supplied at the inquiry that the Obligations would meet the tests of the Community Infrastructure Regulations and could properly be taken into account in reaching a decision.
91. However, neither the suggested conditions nor the Obligations are sufficient to overcome the fundamental harm I have identified.

Overall Conclusion

92. The tilted balance set out in paragraph 14 of the NPPF is engaged as there is no demonstrable 5 year housing land supply. However, as can be seen above, I have found significant harm. My final judgement is that the harm is such that it would significantly and demonstrably outweigh the benefits of the scheme when assessed against the policies of the NPPF as a whole. The proposal cannot therefore benefit from the presumption in favour of sustainable development, and as such there is further conflict with SALP Policy CP1, which seeks to take a positive approach to sustainable development in line with the NPPF. The proposed development is simply, in my judgement, the wrong scheme in the wrong place. Notwithstanding that there is compliance with some development plan policies it is my judgement that there is conflict with the development plan as a whole. For that reason the appeal must fail.

Philip Major

INSPECTOR

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Queen's Counsel

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Planning Director, G L Hearn

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Mr J Evans

Binfield resident and member of Binfield Parish Council

Mr R Bury

Binfield resident

Mrs S Peacey

Binfield resident and Borough Councillor

INTERESTED PERSONS:

Mr M Hicks

Local resident

Mr S Butcher

Local resident and Chairman of Binfield Village Protection Society

Mrs P Bury

Local resident

Mrs J Reed

Local resident

DOCUMENTS HANDED IN AT THE INQUIRY (and afterwards by agreement)

From the Local Planning Authority

- 1 Opening submissions on behalf of the Council
- 2 Copy letter from Binfield Surgery, dated 23 November 2017
- 3 ONS labour Force Survey extract – User Guide 2011
- 4 Fiscal sustainability report extract – Labour market trends
- 5 Email relating to housing trajectory from June 2014
- 6 Email relating to the development of Amber House from December 2017
- 7 Plan of hedgerow loss at the appeal site
- 8 Objection letter submitted by Mr P Hodges and submitted by the Council
- 9 BS 7913:2013 – Guide to the conservation of historic buildings
- 10 Letter from Binfield Surgery regarding the potential to utilise premises at the Blue Mountain site
- 11 Email in relation to the requirement for school land
- 12 Proposed condition relating to off-site highway works
- 13 Note from Mr Mullis on Whitehouse Farm Cottage
- 14 Closing submissions on behalf of the Council

From the Appellant

- 15 Opening statement on behalf of the Appellant
- 16 Statement of Common Ground on Objectively Assessed Housing Need
- 17 Summary table of 5 year housing land supply (now superseded)
- 18 ONS labour Force Survey extract – User Guide 2016
- 19 Note on OBR economic activity/participation rate projections
- 20 Budget Responsibility Committee – who we are
- 21 Note on data sources for the March 2017 economic and fiscal outlook

- 22 Revised summary table of 5 year housing land supply
- 23 Email relating to expected completions at Amen Corner North
- 24 Copy of planning permission for SANG land in Wokingham
- 25 Copy of SANG masterplan
- 26 Copy of SANG plan within Wokingham
- 27 Plan of hedgerow removal since 1880
- 28 Table of land use percentages at the appeal site and Amen Corner
- 29 Table of chronology and purposes of landscape character assessments 2003 to 2017
- 30 Highways and Transport Statement of Common Ground between the Appellant and the Council
- 31 Highways and Transport Statement of Common Ground between the Appellant and Wokingham Borough Council
- 32 Copy of Tithe Map
- 33 Plan of developable area – HAD 36
- 34 Note of street light LED upgrade
- 35 Plan of Warfield Park in relation to bus routes
- 36 Indicative masterplan relating to Core Document 10/32
- 37 Note from Core Strategy DPD table of changes
- 38 Note of telephone conversation regarding management of land around veteran trees
- 39 Letter from Blandy and Blandy relating to public access to the appeal site
- 40 Plan of appeal site with buffer to ancient woodland
- 41 Plan and photographs of Farley Copse
- 42 Note in relation to the proposal for a medical centre at Blue Mountain
- 43 Plan showing the location of the potential medical centres at the appeal site and Blue Mountain
- 44 Updated Statement of Common Ground between the Appellant and the Council relating to housing land supply
- 45 Note from the draft South East Plan examination in public report
- 46 Draft planning conditions (now superseded)
- 47 S106 Statement of Compliance in relation to the Agreement between the Appellant and Wokingham Borough Council
- 48 Draft S106 Agreement between the Appellant and Wokingham Borough Council
- 49 S106 Statement of Compliance in relation to the Agreement between the Appellant and the Council
- 50 Draft S106 Agreement between the Appellant and the Council
- 51 Copy of the option agreement relating to the provision of a medical centre at the appeal site
- 52 Revised draft conditions
- 53 Revised draft conditions with track changes following discussion at the inquiry
- 54 Note from the Appellant in response to the Council's note regarding Whitehouse Farm Cottage
- 55 Note from Thames Water relating to the potential installation of lighting at Nash Park
- 56 Executed S106 Obligation between Bracknell Forest Borough Council, the landowner and the Appellant
- 57 Executed S106 Obligation between Wokingham Borough Council, the landowner and the Appellant

58 Closing submissions on behalf of the Appellant

From the Rule 6 Party

- 59 Response to the Statement of Common Ground between the Appellant and the Council
- 60 Email regarding a pre-application meeting date
- 61 Email from Mrs Bury regarding access to the appeal site fields
- 62 Analysis of objections to the proposed development
- 63 Plan showing development sites in the local area
- 64 Adjusted table of walking times from the appeal site
- 65 Natura 2000 – Standard Data Form
- 66 Wokingham Borough Council Habitat Regulations Assessment for the SPD associated with strategic development locations, 2011
- 67 Plan showing possible arrangement of a medical centre at Blue Mountain
- 68 Location of development sites in relation to Thames Basin Heaths SPA sites
- 69 Letter from Binfield Surgery relating to the timing of a replacement medical centre
- 70 Email relating to the size of the existing building at Blue Mountain
- 71 Email relating to operational proposals for community facilities at Blue Mountain
- 72 Closing submissions on behalf of the Rule 6 Party