

DELEGATED OFFICER REPORT



WOKINGHAM
BOROUGH COUNCIL

Application Number:	251486
Site Address:	Land west of Edney's Hill, Barkham Road, Barkham
Expiry Date:	21 October 2025
Site Visit Date:	20 August 2025
Proposal: Full application for the proposed erection of 16 no. dwellings with new access off Edney's Hill, plus footpaths, car ports, parking, landscaping and associated works.	

PLANNING POLICY

National Policy	National Planning Policy Framework (NPPF) National Planning Policy Guidance (NPPG)
Core Strategy (CS)	CP1 – Sustainable Development CP2 – Inclusive Communities CP3 – General Principles for Development CP5 – Housing Mix, Density and Affordability CP6 – Managing Travel Demand CP7 – Biodiversity CP8 – Thames Basin Heaths Special Protection Area CP9 – Scale and Location of Development Proposals CP11 – Proposals Outside Development Limits CP17 – Housing Delivery
MDD Local Plan (MDD)	CC01 – Presumption in Favour of Sustainable Development CC02 – Development Limits CC03 – Green Infrastructure, Trees and Landscaping CC04 – Sustainable Design and Construction CC05 – Renewable Energy and Decentralised Energy Networks CC06 – Noise CC07 – Parking CC09 – Development and Flood Risk CC10 – Sustainable Drainage TB05 – Housing Mix TB07 – Internal Space Standards TB08 – Open Space, Sport and Recreational Facilities Standards TB12 – Employment Skills Plan TB21 – Landscape Character TB23 – Biodiversity and Development TB25 – Archaeology
Joint Minerals and Waste Plan (JMWP)	The JMWP is not applicable to this application site.

Wokingham Borough Local Plan Update (LPU)	SS1 – Sustainable development principles SS2 – Spatial strategy and settlement hierarchy SS4 – Development within or adjacent to minor settlements SS5 – Development in the countryside SS10 – Meeting our housing needs CE1 – Design principles for efficient buildings CE3 – Environmental standards for residential development C1 – Active and sustainable transport and accessibility C2 – Mitigation of transport impacts and highway safety and design C3 – Active travel C4 – Green and blue infrastructure and public rights of way C5 – Parking and electric vehicle charging ER4 – Employment and skills plans H1 – Housing mix, density and standards H3 – Affordable housing FD1 – Development and flood risk (from all sources) FD2 – Sustainable drainage NE1 – Biodiversity and geodiversity NE2 – Biodiversity net gain NE3 – Thames Basin Heaths Special Protection Area NE4 – Trees, woodland, hedges and hedgerows NE5 – Landscape and design DH1 – Place making and quality design DH2 – Safeguarding amenity DH6 – Archaeology HC4 – Open spaces, sports, recreation and play facilities HC5 – Environmental protection HC6 – Air pollution and air quality HC7 – Light pollution HC8 – Noise pollution HC9 – Contaminated land and water HC10 – Odor, fumes and dust
Other	Borough Design Guide Supplementary Planning Document CIL Guidance + 123 List Affordable Housing Supplementary Planning Document Sustainable Design and Construction Supplementary Planning Document Barkham Village Design Statement Arborfield and Barkham Neighbourhood Plan WBC Play Space Design Guide

RELEVANT PLANNING HISTORY

Application No.	Description	Decision & Date
171276	Application for outline consent for an access road to serve 5 serviced custom build plots (Access to be considered)	Refused 23/08/17 and dismissed at appeal (APP/X0360/W/ 17/3184847)

162084	Outline application for the proposed erection of 5no custom-build dwellings with associated access off Edneys Hill (access and layout to be considered).	Refused 07/10/16 and dismissed at appeal (APP/X0360/W/16/3161362) Linked appeal with app. 161412
161412	Outline application for the proposed erection of 8no custom-build dwellings with associated garages and access off Edneys Hill (access and layout to be considered).	Refused 19/07/16 and dismissed at appeal (APP/X0360/W/16/3154856) .Linked appeal with app. 162084
080141	Proposed change of use of land from agricultural to residential garden. Retrospective.	Refused 18/04/08 and dismissed at appeal

CONSULTATION RESPONSES

Internal

WBC Property Services – No comments received
WBC Environmental Health – No objection subject to conditions
WBC Drainage – No objection subject to condition
WBC Highways – Objection due to site's unsustainable location
WBC Growth & Delivery (Planning Policy) – Comments received relating to the site history and proposed allocation
WBC Economic Prosperity & Place (Community Infrastructure) – No objection subject to Affordable Housing being provided on site
WBC Green Infrastructure – Objection regarding site sustainability, size and location of the site with regards to public open space
WBC Landscape and Trees – Objection due to harm to landscape/ character of the area and poor site layout
WBC Health and Wellbeing – No comments received
WBC Public Rights Of Way – No objection
WBC Community Safety – No comments received
WBC CIL – Development would be CIL liable
WBC Education (School Place Planning) – No comments received
WBC Ecology Newts – No objection subject to condition
WBC Sustainability – No objection subject to conditions
WBC Ecology – Objection as BNG baseline not presently agreed and no mitigation towards Thames Basin Heath Special Protection Area secured
WBC Libraries – No comments received

WBC Sports Development (Places and Neighbourhoods) – No comments received

WBC Waste Services – No comments received

External

Natural England – No objection subject to appropriate mitigation

Southern Gas Networks – Maps of network provided

Thames Water Utilities Ltd – No objection

The Environment Agency – No comments received

Berkshire Archaeology – No objection subject to condition

Royal Berkshire Fire & Rescue – Generic advice received

BOB ICB NHS Buckinghamshire Oxfordshire and Berkshire West – No objection subject to s106 financial contribution of £14,499 towards the creation of additional clinical capacity

Berks, Bucks & Oxon Wildlife Trust – No comments received

Crime Prevention Design Advisor – Recommendations of potential design changes

REPRESENTATIONS

Parish/Town Council

Barkham Parish Council object based on the following summarised points:

- The site is located outside defined development limits
- It would have a harmful impact on the Green Wedge, rural character and settlement separation
- Would result in substandard highway access
- Failure to deliver a design that reflects local distinctiveness
- Concern over sewage and drainage constraints
- Concern over land contamination

Officer comment: *The above will be addressed within the report.*

Ward Member(s)

Cllr Adrian Betteridge objected on the following grounds:

- Already significant pressure in Barkham as a result of previous and underway development. This proposal will exacerbate problematic issues

Officer comment: *The proposal's cumulative impact will be taken into consideration only where necessary and appropriate. For example, WBC Highways will consider the proposal in light of the existing highway network which is utilised by other developments*

- Development of the site has been refused on multiple occasions

Officer comment: *This is noted and will be discussed in the report*

- Cycle links are not adequate

	Officer comment: See Highways section of the report - Proposed flats are out of keeping with the area Officer comment: See commentary on the proposed design/ site layout in the report - The proposed number of dwellings would make a negligible contribution to local housing need Officer comment: See planning balance section of this report. The number of dwellings that would be contributed to the borough's housing stock would not be considered insignificant in light of the borough's absent 5 year housing land supply. The tilted balance engaged and so benefits have to be balanced against shortfalls of the scheme - In the event the application is recommended for approval, it is requested it be heard by the Council's Planning Committee. Officer comment: This is noted. If recommending approval, the application would automatically be presented to the Planning Committee, as per the scheme of delegation
Neighbours	49 objections from individuals (excluding duplicates) and an objection from the Barkham Village Residents association, commenting on the following matters: <u>Highways</u> - Dangerous lack of visibility both exiting and approaching the site - Edney's Hill has no footpaths - Inappropriate walking and cycling provision nearby - Inadequate road capacity on Barkham Road - Would result in increased traffic - Nearby householder application refused on highway reasons - Construction access of Barkham Road near bus stop would be dangerous - Would result in congestion - Inadequate access for emergency vehicles - Inadequate parking and garage provision - Cumulative impact with nearby approved application at Blagrove Lane for residential Officer comment: See Highways section of the report. However, the comments regarding the householder application refused nearby this site on highways grounds is not a material consideration to this scheme, as it is a different site and all applications are required to be assessed on their individual merits

Impact on surrounding area

- Farming land would be lost
- Loss of green space – last green wedge of Barkham
- Rural gap would be lost which would impact the character and appearance of the countryside
- Proposal won't maintain or enhance the area/landscape
- Proposed flats not in keeping with surroundings or Village Design Statement
- Density, scale and design not in keeping
- Will result in the merging of the village with Wokingham town centre
- Carports and weatherboarding not found elsewhere in Barkham

Officer comment: *'Principle of development' and 'Design, Impact on Character and Appearance of the Area and Landscape' section of the report*

Neighbouring amenity

- Direct, intrusive views into Coppid Hill House and their swimming pool
- Will result in unacceptable increase in noise levels and the tranquil nature of Barkham
- Excessive height of buildings would overshadow neighbours

Officer comment: *See neighbouring amenity section of the report*

Housing provision

- Site is not identified in the local plan so this proposal undermines the Council's strategic approach to development
- 16 dwellings would have negligible impact on borough's housing stock
- Not enough evidence that housing development is needed in this specific location. May be more suitably accommodated in other settlements

Officer comment: *See 'principle of development' and 'planning balance' sections of the report. In response to their not being enough evidence that housing development is needed in this specific location; the borough as a whole does not have a 5 year housing land supply. As such there is evidence that as a whole, more housing is required. It is then*

down to Officer assessment as to whether individual schemes are acceptable in relation to material planning considerations.

Natural Environment

- Loss of biodiversity
- Ecology reports carried out in March which is outside of the season
- 10% BNG not provided on site
- Hedges will be lost

Officer comment: See the 'Trees' and 'Ecology' sections of the report

Flooding/ drainage

- The site is on a slope and so gardens at the bottom of Edney's Hill will experience more flooding
- Drains are already overflowing
- Unclear if the sewer network can accommodate the development

Officer comment: See the 'Flooding and Drainage' section of the report

Other

- Pressure on infrastructure

Officer comment: See 'Infrastructure' section of the report

- No consultation with local community

Officer comment: All adjoining neighbours were formally consulted by the Council via letter. A site notice was also displayed and the application advertised in the local newspaper. As such, the Council has fulfilled its obligations for publicising the application once received. Whether or not an applicant discusses their proposal with the community in advance of submitting an application is their choice. It is not a requirement of an applicant, but is strongly encouraged

- Previous applications for smaller developments dismissed at appeal

Officer comment: This is noted and will be discussed in the report

- Air Source Heat Pumps proposed but no further detail on these and they could impact neighbours and wildlife

Officer comment: See 'Building Sustainability' section of the report

- Will disrupt the sense of community and lead to a less cohesive environment

Officer comment: Officers are unclear as to the basis of this comment. Officers do not have reason to believe that future

	<i>occupiers of this development would be unable to integrate suitably with the wider community</i> • Security issues – extra and easy access from the proposed estate on neighbouring gardens is a concern Officer comment: <i>There is not evidence to assume the new residents of the development would pose a security issue</i> • Benefits attributed to the proposal are overplayed in social, economic and environmental terms Officer comment: <i>This is subjective and one of judgement. See the 'Planning Balance' section of the report for the officer view</i> • Land contamination potential – concern for neighbours and workers Officer comment: <i>See 'Environmental Health' section of the report</i> • Policy compliant level of affordable housing is not proposed Officer comment: <i>The applicant is proposing a policy compliant level of affordable housing, with a mixture of on and off-site provision. See 'Housing Affordability' section of the report for more commentary.</i> • Pressure on water supply Officer comment: <i>See 'Flooding and Drainage' section of the report</i> • Would conflict with policies in Neighbourhood Plan and policies within the Local Plan Update Officer comment: <i>This report assesses the proposal in light of adopted policies both at borough and neighbourhood level. Due to the overall limited weight of the LPU, the application is only assessed against some LPU policies that are considered to hold moderate weight.</i> • Applicant not local to the area Officer comment: <i>This is not a material planning consideration</i>
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APPRAISAL

Site Description:

The application site comprises of an open field measuring 0.7 hectares. The site is currently free of built form. Upon the site visit there was also no indication of grazing animals on the land. The topography of the land, and surrounding roads, falls away in

broadly a south-easterly direction, with the lowest part of the site being the south-east corner. The maximum level difference is approximately 10m.

The site is located on the corner of Edneys Hill where it meets Barkham Road and has vegetation along the northern and eastern boundaries.

Proposal:

Full application for the proposed erection of 16 no. dwellings with new access off Edney's Hill, plus footpaths, car ports, parking, landscaping and associated works.

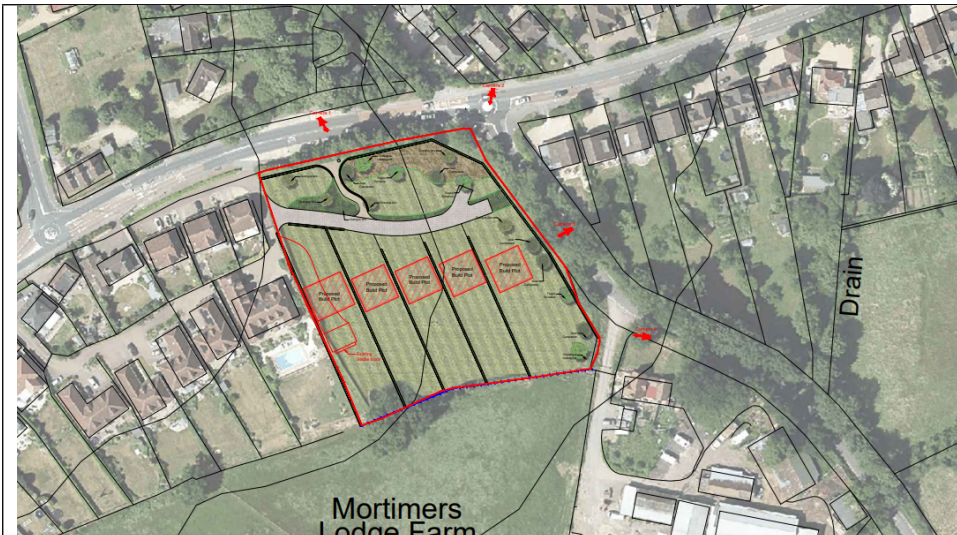
The dwellings would comprise of 10 dwellings (8 x semi-detached and 2 detached) along with a block of 6 flats.



Planning History

As can be seen from the planning site history, the site has been the subject of several planning applications for residential development that have all be dismissed by the Planning Inspectorate. Some of the recent previous applications and summary of reasons for refusal are below:

Application 171276 (5 dwelling scheme):



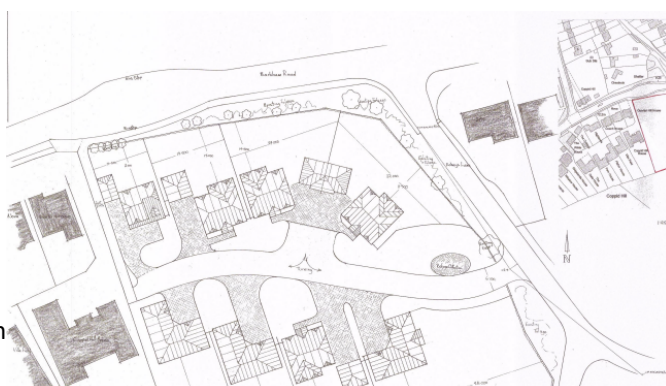
Refused based on urbanisation of the countryside/ impact on rural character, impact on a priority habitat and impact on the Thames Basin Heath Special Protection Area. Only the latter was overcome at the appeal.

Application 162084 (5 dwelling scheme)



Refused on impact on the countryside and rural character, lack of affordable housing, impact on the Thames Basin Heath Special Protection Area and impact on protected species. Appeal dismissed on all grounds.

Application 161412 (8 dwelling scheme):



Refused for same reasons as application above, with an additional reason of poor living conditions for future occupiers. Appeal dismissed on all grounds.

Principle of Development:

The National Planning Policy Framework has an underlying presumption in favour of sustainable development which is carried through to the local Development Plan. The Managing Development Delivery Local Plan Policy CC01 states that planning applications that accord with the policies in the Development Plan for Wokingham Borough will be approved without delay, unless material considerations indicate otherwise.

a) Principle of development under the development plan

The site is situated within the designated countryside, outside of but adjacent to the Limited Development Location of Barkham Hill.

Core Strategy Policy CP9 (Scale and location of development proposals) directs development to locations within development limits and states that *“The scale of development proposals in Wokingham borough must reflect the existing or proposed levels of facilities and services at or in the location, together with their accessibility”*.

Development proposals in the designated countryside should be assessed against Core Strategy Policy CP11 (Proposals outside Development Limits). Policy CP11 states that development proposals will not normally be permitted in the countryside except where one or more of the specified exceptions apply:

- 1) It contributes to diverse and sustainable rural enterprises within the borough, or in the case of other countryside based enterprises and activities, it contributes and/or promotes recreation in, and enjoyment of, the countryside; and*
- 2) It does not lead to excessive encroachment or expansion of development away from the original buildings; and*
- 3) It is contained within suitably located buildings which are appropriate for conversion, or in the case of replacement buildings would bring about environmental improvement; or*
- 4) In the case of residential extensions, does not result in inappropriate increases in the scale, form or footprint of the original building;*

5) *In the case of replacement dwellings the proposal must:*

- i) Bring about environmental improvements; or*
- ii) Not result in inappropriate increases in the scale, form or footprint of the original building.*

6) *Essential community facilities cannot be accommodated within development limits or through the re-use/replacement of an existing building;*

7) *Affordable housing on rural exception sites in line with CP9. 3.6 The application proposal does not meet any of these specified exceptions and is therefore contrary to Policy CP11.*

The application proposal does not meet any of these specified exceptions and is therefore contrary to Policy CP11.

Turning to the overall aim of Policy CP11, this is to protect the separate identity of settlements and maintain the quality of the environment. Regarding the former, the application site is located within a gap of the Limited Development Location, as can be seen below:

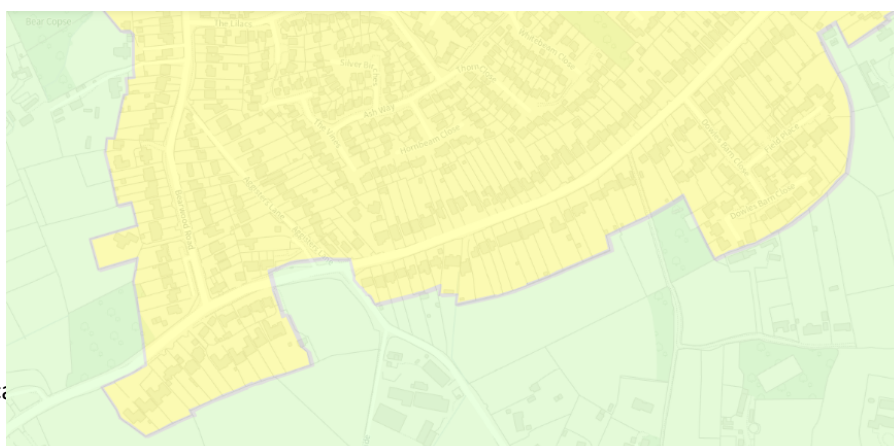


Figure 1: Extent of Barkham Hill Limited Development Location (yellow) and countryside (green)

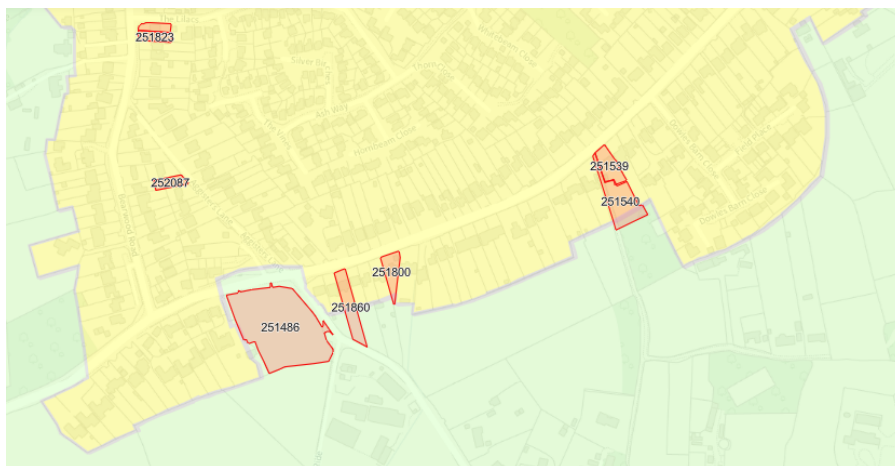


Figure 2: Application site shown in relation to Barkham Hill settlement limits/ countryside (application site indicated in red with ref. 251486)

The proposal would therefore essentially be infilling this portion of countryside between the established boundaries of settlement. However, when turning to settlement coalescence, this would not be the case due to the distance between this settlement and others. This can be seen below:



Figure 3: Application site indicated by a star. Yellow, blue and purple locations indicate settlement limits with green indicating countryside

It is appreciated that encroachments/ infilling of countryside can incrementally contribute towards settlement coalescence. However, this proposal in itself would not result in such an effect. As such, the proposal would not conflict with the overarching aim of policy CP11 in that it would result in settlement coalescence. It is acknowledged that the Parish Council raise concern over the development eroding the function of the 'Green Wedge'. From looking at historical decisions at the site (notably 080141), it appears the 'Green Wedge' was dictated under policy WCC2 of the Wokingham District Local Plan (2004). This plan was superseded by the currently local plan which does not refer to the term 'Green Wedge' within policy CP11 but rather seeks to protect the individual identity of settlements and prevent settlement coalescence. Officers have assessed the proposal in the context of settlement coalescence and consider the proposal would not result in this. Furthermore, the more recent residential appeals at the site did not raise use this specific term as part of a reason for refusal.

In terms of the second overarching aim of policy CP11 which is to maintain the quality of the environment, this is a multi-faceted assessment which encompasses a number of material considerations which will need to be further assessed in this report.

Policy CC02 (Development Limits) of the Managing Development Delivery (MDD) local plan (2014) supports development proposals on the edge of settlements, provided it can be demonstrated that the development is *"within development limits and respects the transition between the built-up area and the open countryside by taking account of the character of the adjacent countryside and landscape"*. This policy reinforces that development plan policy seeks to guide development to locations within defined development limits.

Site Sustainability

Paragraph 115 of the NPPF states that:

'In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

a) sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location;

Policy CP6 of the Core Strategy states that planning permission will be granted for schemes that:

- a) Provide for sustainable forms of transport to allow choice;*
- b) Are located where there are or will be at the time of development choices in the mode of transport available and which minimise the distance people need to travel;*
- c) Improve the existing infrastructure network, including road, rail and public transport, enhance facilities for pedestrians and cyclists, including provision for those with reduced mobility, and other users.*

The appropriateness of the site for residential development in relation to key sustainable transport modes has been assessed by WBC Highways.

Walking, cycling and proximity to local facilities

The Borough Design Guide SPD states 'if places are to be sustainable then the aim should be to create: Walkable neighbourhoods, with a range of facilities within 10 minutes walking distance of residential areas, which encourage people to travel on foot or by bicycle.' Walkable neighbourhoods are defined in Manual for Streets (MfS) as those typically characterised by having a range of facilities within 10 minutes walking distance from residential areas.

The applicant has provided a sustainability assessment within the transport statement. However, WBC Highways require the actual walking distances to be measured from the mid-point of the site, instead of the site access. When travelling down Edney's Hill from Barkham Road, the pavement ends and therefore could actively discourage walkers as they would need to walk on the road.

It is relevant to note that the shortest walking route towards the village store and post office will be via PRow (BARK19), a byway opens to all traffic, which is unlit and therefore would not be an attractive walking environment for future residents.

There is a lack of day-to-day local facilities except of a village store, post office and nursery. Furthermore, the proposed walking route for the nursery (Toad Hall Nursery) will have to be accessed via Edney's Hill, which is subject to national speed limit. There is no proper pedestrian/cycling route and street lighting along Edney's Hill, which does not provide safe and attractive environment for considering sustainable travel modes.

Access to public open space

As well as a focus on accessibility to day-to-day physical facilities, access to other types of facilities, like public open space, also needs to be considered.

Policy TB08 of the MDD outlines the public open space standards required for new residential development. Whilst public open space is a factor in a landscape led scheme and design, public open space is required for designated recreation and other purposes.

To comply with the requirements of policy TB08, the following amount of open space per typology is required:

POS Typology	Standard (ha per 1,000 population)	Application Requirement (in ha)
Parks and public gardens	1.1	0.0422
Amenity greenspace	0.98	0.0376
Play areas (LLAP, LEAP, LAP)	0.25	0.0096
Civic space	0.01	0.0004
Allotments	0.52	0.02
Natural/semi natural green space	2.84	0.1091

Upon consultation with the WBC Green Infrastructure officer, there is concern that from a sustainability perspective, there is insufficient open spaces nearby to meet the needs of the new development. The site is not well-connected to public open spaces such as amenity greenspace and play areas, and there are currently no plans to build more of these spaces within a reasonable distance to the application site.

Whilst policy CP4 of the Core Strategy states that '*planning permission will not be granted unless appropriate arrangements for the improvement or provision of infrastructure, services, community and other facilities required*', and supporting text paragraph 4.27 lists public open space as a form of infrastructure.

However, securing financial contributions for off-site provision would not be appropriate as the Green Infrastructure Officer has confirmed there are no nearby facilities to improve or spaces to create them. The site is also too small to provide all of the required open space typologies; what has been provided on site are incidental open spaces.

The site is below, with the nearest amenity greenspace/playing fields/play area is Barkham Recreation Ground (red pin-point), which is half a mile walk from the application site. There are no other public open spaces that are within reasonable walking distance.

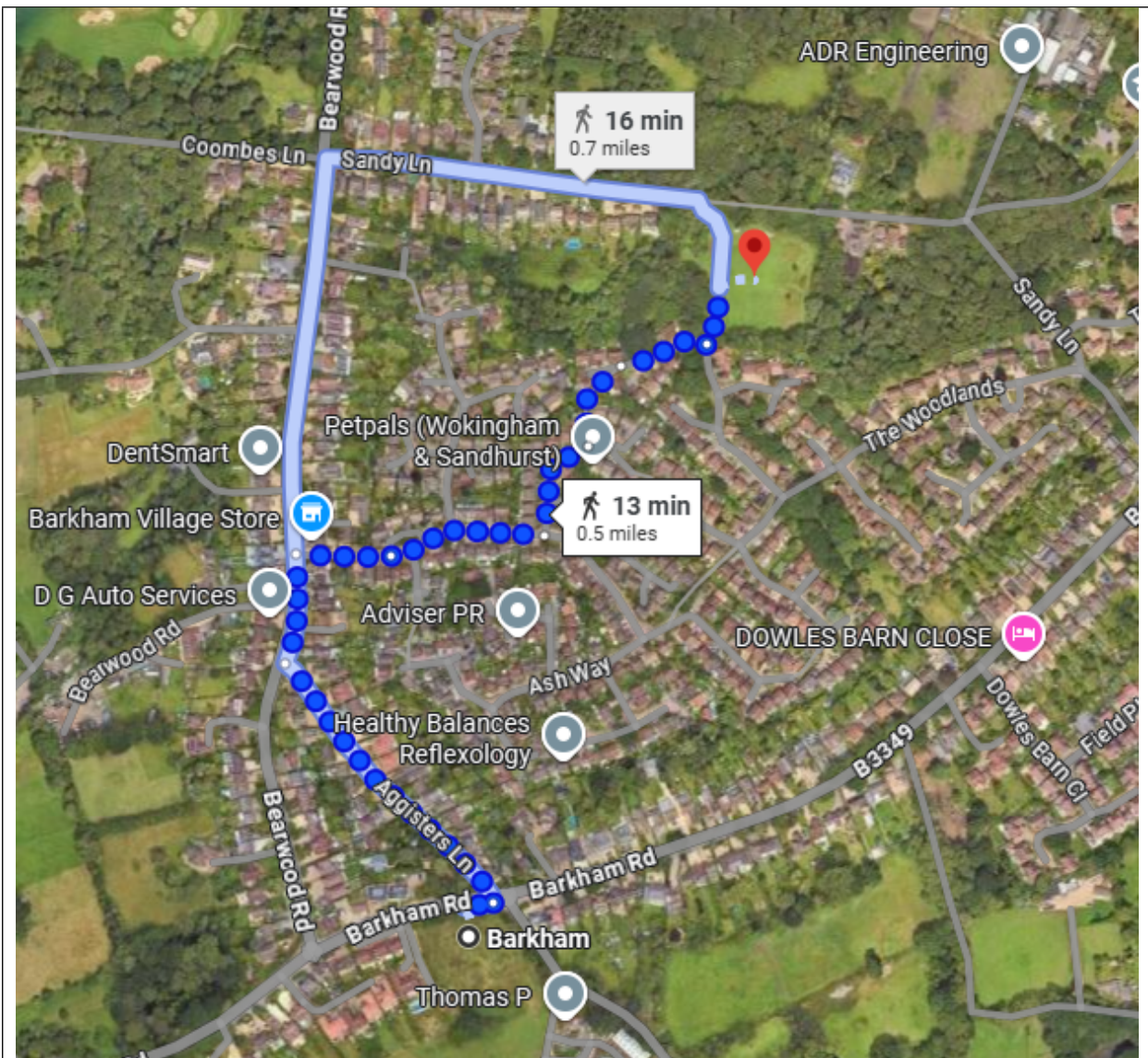


Figure 4: Walking route between the site and Barkham Recreation Ground

The WBC play area design guide has the following standards:

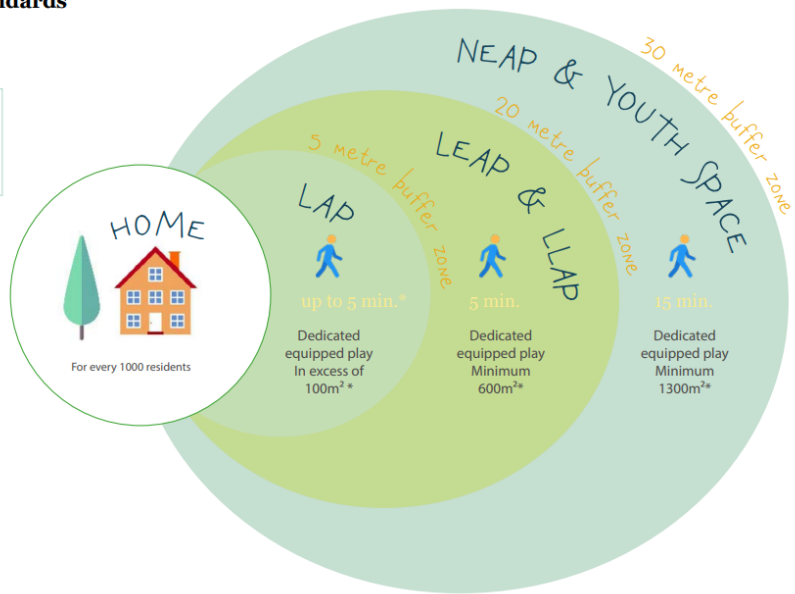
05 Play Space Standards

Open Space Requirements for Play

Dedicated Play Space	0.25 ha/1000 person
Informal Playable Space	0.55 ha/1000 person
Total	0.80 ha/1000 person

Destination Playground

A large 'destination' play area within a key site, such as a park. These facilities are aimed at attracting families and larger groups for longer visits; and tend to have car parking with access to other facilities such as a cafe and toilets.



LAP

Local Areas for Play are typically for young children up to 6 years and have equipment that is designed for younger children. To be provided as part of a combined facility to meet WBC minimum sizes for play areas, i.e. alongside a LEAP or a NEAP

LEAP

Local Equipped Areas for Play are typically for children aged 0 to 11 who are beginning to play independently and will include play equipment that is more challenging.

LLAP

Local Landscaped Areas for Play are typically for children aged 0 to 11 who are beginning to play independently; with play equipment that is natural in style and a mix of physical challenges and features designed for imaginative play, calm relaxation and social interaction.

NEAP

Neighbourhood Equipped Areas for Play are typically for children aged 0 to 11 plus young people aged 12+ and will include a range of challenging play equipment, with a hard surfaced area of at least 465 sq.m designed for ball games or wheeled sports.

Youth Space

Youth Space is typically for young people aged 12+ and has equipment designed for either physical activity or calm relaxation, and social interaction.

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As can be seen above, Officers would expect both a LAP and LEAP play area within a 5 minute walk of the development. The existing play area highlighted above is almost 3 x this distance, and the size of the play area there is only around 135m²; the minimum for a LEAP is 600m². As such, it is too far away and is insufficient in size to serve the new development.

Owing to both on-site and off-site provision not being suitable, for the reasons outlined above, the future occupiers of the development would be left to reside in a location that has poor access to meaningful areas of public open space. Whilst residents would have access to private amenity spaces, public open space is still required for the purposes of formal play and recreation and also has associated health benefits. This is supported by paragraph 103 of the NPPF which states that...

"Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change."

As such, the site sustainability in the context of access to public open space as a local facility is also substandard.

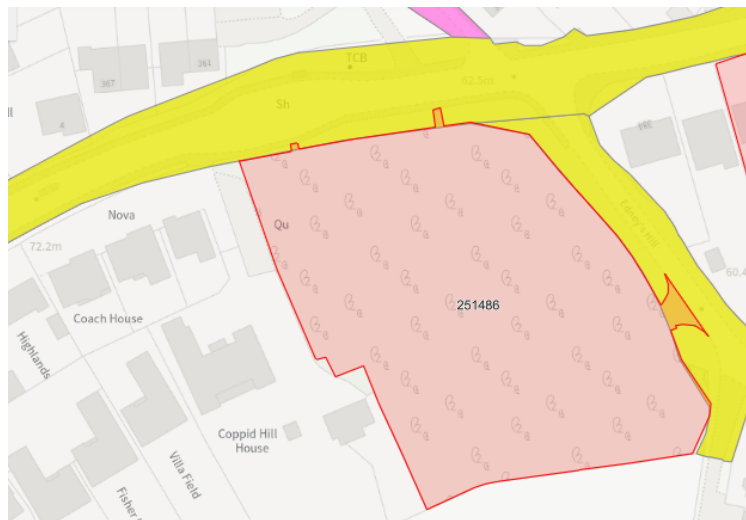
Public Rights of Way

Barkham Byway 19 (Aggister's Lane) is situated to the north of the development. The WBC RRoW Officer advised that the proposed development does not appear to significantly impact the byway.

However, they advised that the number and surfacing treatment of the pedestrian links to the north of the site is acceptable, however the width of the footway to the

north of the site does not appear to exist on the ground currently. The PRow Officer noted that there is currently significant interference along the route from vegetation and the embankment, but states it belongs to the application site and therefore it is suggested that as part of this development this path is widened to cater for increased pedestrian use from the proposed development.

However according to the Council's internal mapping systems, the embankment to the north of the site, adjoining the pavement, is adopted by the Council. The yellow represents adopted Highway land and the site is indicated in red with the number '251486'.



As such, widening the pavement onto the embankment is not within the applicant's control, nor has WBC Highways requested this to make the development acceptable.

Buses

The supporting text to policy CP6 of the Core Strategy sets out the requirement of a good bus service:

- a) *At least a thirty-minute service frequency during peak times (7:00 to 9:00 and 16:00 to 19:00 Monday to Saturday); and*
- b) *At least an hourly service frequency during off-peak hours (9:00 to 16:00 and 19:00 to 22:00 Monday to Saturday and between 7:00 and 22:00 on Sundays).*

The site can benefit from the regular bus services '3 leopard' at Bearwood Road in both directions.

The bus service '3 leopard' at Bearwood Road are as follow:

- Services on Mondays to Saturdays:
 - Towards Wokingham: half-hourly from 8am to 9pm; hourly between 6am and 8am, 9pm and 11pm
 - Towards Reading: half-hourly from 8am to 8pm; hourly between 6am and 8am, 8pm and 12am
 -
- Services on Sundays:

- Towards Wokingham: hourly from 8am to 9pm
- Towards Reading: hourly from 9am to 8pm

It may be relevant to note that the current service to Wokingham has already been enhanced in May 2025 to increase the frequencies during daily time, and to provide late evening and Sunday services.

While the current service does not fully comply with the defined good services under policy CP6, the frequency of service is still sufficient.

Summary

The site represents an unsustainable location for residential development in terms of its non-motorised access to day-to-day facilities, including areas of public open space.

It is acknowledged that the previously refused applications the site (see planning history) were not refused on the site being an unsustainable location. However, the quantum of development now proposed is double/ more than double that of the previous schemes. As such, this has to be factored into the assessment and whether the site is sustainable for this higher quantum of development.

Furthermore, the previous residential applications in 2016 were determined under the 2012 version of NPPF, which provided a less rigorous approach to sustainable development. However, the latest NPPF (dated December 2024) has significantly more emphasis on prioritising sustainable travel modes, limiting future car use and promoting well-designed places.

As such, in principle, the site is not a suitably sustainable location for the residents of 16 dwellings utilising alternative transport modes to the private motor car to access facilities and services, including public open space, which will mean a reliance on the private motor car for future occupiers of the site to reach necessary facilities, including areas of public open space. Overall, the proposal is contrary to policies CP1 and CP6 of the Core Strategy, policy TB08 of the MDD and sections 8 and 9 of the NPPF.

b) Principle of development under Arborfield and Barkham Neighbourhood Plan

The application site is located within the parish of Barkham and therefore the Arborfield & Barkham Neighbourhood Plan (which was made in April 2020) forms part of the development plan for the area. The neighbourhood plan is in broad conformity with the strategic policies in the Core Strategy and Managing Development Delivery (MDD) local plans and has appropriate regard to the NPPF.

The neighbourhood plan does not contain allocations for new housing. However, policy AD1 supports housing development within development limits (subject to meeting other policy requirements). It does not refer housing outside of settlement limits, such as in this case.

Relevant policies relating to the proposals include Policy 'IRS1: Preservation of separation of settlements', which relates to development within countryside areas and seeks to preserve the character and appearance of the countryside. This policy is consistent with CP11 and states development is required to comply with CP11, along with introducing emphasis on character and visual separation and perceived coalescence of existing settlements.

Policy 'IRS2: Recognise, respect and preserve identity and rural setting of settlements' also reflects Core Strategy and MDD policy in requiring the scale and density of the development to respect the distinctive character and biodiversity of the area. A requirement of IRS2 is that developments respect and preserve any 'outstanding views', which are defined at paragraph 4.16 as views that present "an exceptional panorama of the landscape and including middle and distant features".

Policy 'IRS3: Protection and enhancement of the natural environment and green spaces' requires development proposals to conserve and enhance the natural environment which is consistent with the requirements of the NPPF in seeking biodiversity net gain and measures that mitigate and adapt to climate change.

Policy 'AD2: Prioritise housing for local needs' requires residential development proposals to demonstrate how they will contribute to a balanced mix of housing to meet the needs identified in the Arborfield and Barkham Housing Needs Analysis 2019 (or successor document). This suggests a need for starter homes and specialist homes for older people which will need to be considered. AD2 further specifies a preference that for-purchase affordable housing be prioritised for key workers with a local connection to the Neighbourhood plan area in the first instance and next to the wider borough.

Other policies are also of relevance, including 'AD3: High quality development with generous open space, properly landscaped'; 'GA1: Minimise additional traffic on unsuitable roads' which is consistent with CP4 and CP6; and any improvements to public transport will be supported in accordance with 'GA3: Public transport improvements with long term viability'.

c) Principle of development under emerging policy

The Local Plan Update (LPU), the plan which will supersede the adopted Core Strategy and MDD local plans, is at Regulation 22 stage as it has been submitted to the Planning Inspectorate for examination. As per paragraph 49 of the NPPF:

Local planning authorities may give weight to relevant policies in emerging plans according to:

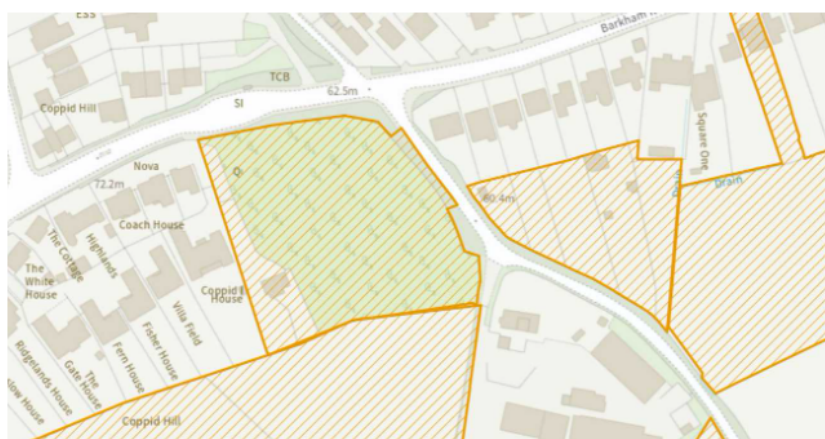
a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);

b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and

c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given)

As a whole, the LPU is still given limited weight, despite its advance stage of preparation. This is owing to unresolved objections to a great number of the policies contained within it. However, those policies highlighted in **yellow** in the policy table earlier in this report are those that have received less objection and therefore individually hold are considered by officers to hold moderate weight in the determination of this application. All the others hold limited weight. The policies that hold moderate weight will feed into/ be considered in their relevant sections in this report.

It should be noted that the application site closely resembles Call for Sites promotion 5BA017 (see map below), albeit the application site does not extend as far west as the site promotion.



Site 5BA017 was promoted for the development of between 8-14 dwellings. The site was assessed through the Housing and Economic Land Availability Assessment (HELAA) (2024) and published alongside the Regulation 19 Proposed Submission Plan. The site was considered unsuitable for development, as a result of the erosion of the open, rural character of the site and the lack of services and facilities within a 10-minute walk of the site, as it would increase reliance on private car usage and therefore undermine the site's sustainability. The site was therefore excluded at Stage 2c of the HELAA and has not therefore been proposed for allocation in the Regulation 19 Submission Plan, nor any earlier consultation version of the local plan.

d) Housing land supply position and the 'tilted balance'

The latest published assessment of housing land supply concluded a deliverable supply of 2.5 years as of 31st March 2025.

The National Planning Policy Framework (NPPF) states under paragraph 11 that where a local authority is unable to demonstrate a five-year supply of deliverable housing sites, the most important policies relating to the application may be viewed as being out of date. It continues to advise that unless there are specific policies in the NPPF protecting the land subject to the application, that permission should be granted unless the adverse impacts of doing so would **significantly and demonstrably** outweigh the benefits when assessed against the NPPF as a whole, having particular regard to key

policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.

Whilst the Council are unable to demonstrate a 5 year housing land supply, material to decisions on planning applications involving housing is the underlying reasons for the shortfall in deliverable housing sites. The shortfall is not as a result of non-delivery of housing but due to the significant over delivery in recent years reducing the bank of land with extant planning permissions, and the recent increase in Local Housing Need.

The council's record of housing delivery been recognised by Inspectors in recent appeal decisions, including:

- Land east of Lodge Road (application ref 220458, appeal ref APP/X0360/W/22/3309202)
- Land off Watmore Lane / Maidensfield (application ref 230208, appeal ref APP/X0360/W/22/3309202)

Nevertheless, as discussed above, paragraph 11(d) of the NPPF is engaged due to the Council being unable to deliver a 5-year housing land supply. Within paragraph 14 of the NPPF it acknowledges the relationship between paragraph 11(d) and those areas that have an adopted Neighbourhood Plan, which is the case in Arborfield and Barkham.

In situations where the presumption (at paragraph 11d) applies to applications involving the provision of housing, the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits, provided the following apply: a) the neighbourhood plan became part of the development plan five years or less before the date on which the decision is made; and b) the neighbourhood plan contains policies and allocations to meet its identified housing requirement (see paragraphs 69-70)

In this instance, paragraph 14 of the NPPF is not engaged as the Neighbourhood Plan became part of the Wokingham development plan more than 5 years ago (it was made April 2020) and the neighbourhood plan does not explicitly contain allocations to meet an identified housing requirement.

As such, paragraph 14 of the NPPF is not engaged and therefore any harm identified with the proposal will not be weighted to 'significantly and demonstrably' outweigh the benefits as a result of the Neighbourhood Plan. However, a full assessment taking paragraph 11(d) of the NPPF into account will be made.

Paragraph 84 of the NPPF seeks to avoid new isolated homes in the countryside unless there are special circumstances such as a rural worker's dwelling, optimal viable use of a heritage asset, reuse of redundant or disused buildings, and subdivision of an existing building or if the building is of exceptional design. The site is located adjacent to settlement limits, for multiple dwellings. As such, the proposal will not result in isolated new dwellings and will comply with paragraph 84 of the NPPF.

e) Principle of the loss of existing land

The existing site is greenfield land in private ownership. Whilst an area of open space, it is not publicly accessible and so would not result in the loss of publicly accessible open space. Furthermore, the site is not used for the production of crops. Within the applicant's planning statement, it states that the site is not being actively grazed. This was also the case upon the case officer visiting the site.

Given the lack of function of the existing land for any particular defined or formal purpose, the loss of the greenfield site is accepted in principle terms as it will not result in the loss of another important principle use. However, and as will be discussed later in the report, the loss has to be assessed in visual terms.

f) Conclusion on principle of development

The application proposal is located within the designated countryside and does not satisfy any of the exceptions set out in Policy CP11 concerning development beyond development limits in countryside locations. The application is thereby contrary to these aspects of the development plan along with IRS1 of the Arborfield and Barkham Neighbourhood Plan. However, as mentioned, it will need to be fully assessed as to whether the proposal conflicts with the overall aims of Policy CP11 too; namely as to whether it would fail to maintain the quality of the environment.

Notwithstanding this, the site has also been deemed an unsustainable location for residential development by reason of its poor access to day-to-day facilities and amenities, including areas of public open space, by non-motorised transport modes.

However, by virtue of the council's current housing land supply position, the presumption in favour of sustainable development set out in the NPPF at paragraph 11 is now engaged in the decision-making process. Accordingly, an assessment will need to be made of whether any adverse impacts of granting permission would **significantly and demonstrably** outweigh the benefits, when assessed against the policies in the NPPF taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination. This is known as the tilted balance and will be returned to at the end of this report.

Design, Impact on Character and Appearance of the Area and Landscape

Policy TB21 of the MDD states that proposals must demonstrate how they have addressed the requirements of the Council's Landscape Character Assessment, including the landscape quality; landscape strategy; landscape sensitivity and key issues. In addition, proposals shall retain or enhance the condition, character and features that contribute to the landscape.

Policy CC03, in sub paragraph (c) that development should promote the integration of the scheme with any adjoining public space or countryside. Within sub-text paragraph 2.19 it states that a landscape and visual impact study will be required where the site is located on or adjacent to the development limits or where the proposal may have an impact on the townscape around it.

Arborfield and Barkham Neighbourhood Plan Policy IRS2 gives weight to the Barkham Village Design Statement (VDS) and seeks to ensure that development recognises, respects, and preserves the rural setting of settlements.

Paragraph 131 of the NPPF (2024) notes that good design is a key aspect of sustainable development

Setting the scene – the landscape

The site is located within Wokingham Borough Landscape Character Assessment (WBLCA-2019) Area J2 'Arborfield Cross and Barkham Settled and farmed Clay'. A landscape of moderate quality, sensitivity and a modest capacity for change

Paragraph 187 (b) of the NPPF states that 'Planning policies and decisions should contribute to and enhance the natural and local environment by... recognising the intrinsic character and beauty of the countryside'.

The valuable landscape attributes that relate to the site and its surroundings include;

- Pattern of arable and pastoral fields, which provides a rural character away from settlement, and creates an important separation between settlements.
- Mature hedgerow trees and in-field trees which provide a wooded character and visual interest within the landscape.
- Rural settlement pattern of farms, hamlets and small nucleated villages outside the urban area which provides a rural character and a link to the past.
- Recreational value of the network of rights of way between settlements.
- Views across the landscape to surrounding character areas, particularly across the river valleys to the west and to the wooded hills to the north and south provides a loose sense of enclosure.

The key issues affecting the J2 LCA relevant to the site include;

- Effects on tree health or species composition of woodland and wet woodland as a consequence of pathogens and climate change....
- Hedgerow loss and replacement with fencing associated with the expansion of fields and intensification of agriculture....
- Loss of structure and species diversity of the woodland belts has occurred in the past through cessation of coppice management....
- Lack of the recruitment of young trees (through natural regeneration or planting) required to rebalance the age structure of hedgerow trees is an on-going threat to the character of the landscape.
- Pressure for large scale residential development and supporting infrastructure impact landscape character
- Increased traffic on rural roads due to expanding residential development in the area leading to loss of tranquillity, erosion of road verges and increased levels of air pollution in rural areas.
- Light pollution at night causing 'sky glow'.
- High demands for recreation continue to threaten the tranquillity of the landscape.

The Landscape Strategy is to conserve and enhance the remaining rural character of the landscape. The key aspects to be conserved and enhanced are the field pattern with mature hedgerow trees, wetland and woodland habitats, rural lanes and historic features. In terms of development, the aim is to integrate new development into its landscape setting and retain the open and rural character of the landscape between settlements.

Applicant's position on effect on the landscape

The applicant, within their Landscape Visual Assessment (LVA), considers *"the potential landscape effects to be within a Moderate to Moderate / Minor adverse range over the longer term, which would not be a material change or a significant effect when taking into account the mitigation measures and the carefully considered development."* In terms of impact on the J2 Landscape Character Area, they consider the potential effects to be *"no higher than negligible adverse"* owing to the scale of the development and the considered design which is reflective of the village form.

It was also stated that the effects on landscape character *"will be highly localised and limited to the landscape character of the site itself and immediate adjoining areas only where it will be compatible with the prevailing character. The extent of potential landscape effects is restricted to the Site and adjoining areas only and reduces considerably within the immediate setting of Barkham."*

Council's position on effect on the landscape/ surrounding area

Officers are of the view that the site plays an important role in the transition of settlement to the open countryside to the south. As such, it is not considered that the site can be regarded as a contained site, but rather the site sets a transitional tone which consequently is read in the context of a wider landscape.

Whilst relatively small, the role the site has in the surrounding area and landscape should not be downplayed and has been recognised by appeal Inspectors.

In appeal decisions for residential development on this site, Inspectors notes the open, rural character of the site and its prominent position at the top of the hill, as well as its location, outside of the settlement limits, within designated countryside.

In paragraph 9 of the appeal for 171476, the Inspector concludes:

I note that the site is not subject to any particular landscape designations and that it does not include specific landscape features of particular identified merit. However, the site has a largely undeveloped appearance and currently offers a significant break in the built frontage along Barkham Road. At the time of my site visit, views into the front part of the site were readily available from the road and footway and due to the elevated and sloping nature of the site, the appeal site was partially visible over longer distances from Edneys Hill across the open fields behind the site. Whilst I recognise that the boundary trees and vegetation provide some visual containment, the degree of visibility will vary according to the seasons. Nonetheless, the site offers a significant green openness, which contributes individually and together with the other less developed areas nearby to the more rural aspect of this semi-rural street scene

In paragraph 10 of the same appeal the Inspector states:

The introduction of five detached dwellings on the site would inevitably substantially erode the overriding open character of the site.

Paragraph 13 goes on to say:

While the site does not have an agricultural appearance, it's green, open and generally undeveloped and rural character would give way to a more urbanised, residential character and appearance. This would be detrimental to the semi-rural character of the site and its surroundings, as well as the intrinsic countryside character of the area more widely

Paragraph 9 of the Inspector's decision of linked appeals 162084 and 161412 states:

In terms of the physical impact of the developments, the erection of new dwellings would erode the open character and quality of the area by extending the built development in an undesirable fashion. In this respect, both developments would give rise to significant harm to the rural character of the area. In coming to that conclusion I acknowledge that there would be areas of greenery remaining, albeit as part of large residential gardens.

These previous decisions are material planning considerations. Conclusions made by the Inspector in supporting the Council's previous concerns regarding the impact residential built form would have on this site and the surrounding countryside/ landscape more widely are required to be factored into this assessment. Officers do not consider that previous concerns raised regarding the loss of the site as an open field and the associated impact on the surrounding countryside, landscape and rural character have not changed or been overcome as a result of this proposal. Rather, this proposal sees a substantial increase in the amount of built form proposed and so harm would be further exacerbated.

The site represents a pause/breathing space of landscape where there are other such pauses such as opposite at Aggisters Lane, and slightly to the west at the junction with Bearwood Road (1A Bearwood Road) which are typical features of Barkham Road as it moves into countryside. Edneys Hill is a country lane with typical features of a narrow roadway lined with highway verges of trees and hedges, and undulating in form due to the shallow wooded valleys of J2 LCA and provides the key views into the site currently – illustrated by view points 9, 10, 11 & 12 in the LVA.

Of the 14 viewpoints in the LVA, 5 are from different locations along Barkham Road and provide clear views of the site and the WBC Tree & Landscaping Officer assesses the development will have a very high/high magnitude of change on the receiving landscape. Of the 6 viewpoints from Edneys Hill 6, 8, 9, 10, 11 and 12, it is considered that 5 of these views will be lost as a result of development which will have a very high magnitude of change of the receiving landscape.

The general thrust of the conclusion of the WBC Tree & Landscape Officer is consistent with that of Inspectors who have attributed great value to the retention of this parcel of land as an open field for substantially smaller schemes where the physical amount of

development on the land would have been much less. Built form, especially in a residential use, would have an urbanising and detrimental impact on the rural and verdant character of the site and the J2 landscape character area.

Reverting back to the key issues facing the J2, one is: *pressure for large scale residential development and supporting infrastructure impact landscape character* and the an aim of the landscape strategy in terms of development, to *integrate new development into its landscape setting and retain the open and rural character of the landscape between settlements*.

Here, the new development would fail to integrate into its landscape setting, as it is not considered a scheme that suitably accounts for its positioning as a sensitive/transitional point in the landscape. It also obliterates the open field which has been valued by the Council and appeal inspectors alike as an important part of the rural character of the area and landscape. It is also of a non-sensitive layout and design, as will be discussed below. Notwithstanding this, the transitional space within the site layout between the proposed development and the countryside to the south is not wide enough to accommodate the attenuation basin, and a surrounding open space for the development, as well as an adequate transitional landscape, which is required along the southern boundary to mitigate the visual impact of development.

Along with the physical built form that is proposed, associated with redevelopment of the site for residential would come with the associated operations and paraphernalia of everyday residential life and an access point would be created for two way traffic. Overall the redevelopment would naturally be well above and beyond that of the existing site and create a development that would erode and urbanise the comparatively undeveloped and landscape both in a visual and aural sense.

Design/ Site Layout

Policy CP3 of the Core Strategy states that development proposals should be of an appropriate scale of activity, mass, layout, built form, height, materials and character to the area.

RD5 of the Wokingham Borough Design Guide states that new development in the rural area should respond to the typical forms of buildings in the village or locality.

Policy AD3 of the Arborfield and Barkham Neighbourhood Plan seeks high quality development and design.

Immediately surrounding the site is linear development facing Barkham Road. There is some tandem development (5 houses) located to the west which are again situated in a linear fashion.

This proposal would see development that is arranged in a linear fashion facing Barkham Road. The absence of development facing the road had been criticised under previous applications/ appeals. However, owing to being a small estate, the orientation of dwellings then begins to vary, with 2 x 1003 type dwellings and 1 x 1358 type dwelling being positioned more centrally within the site and not having a direct relationship with any existing pattern of development. Owing to their orientation, they would not read as an extension to the tandem development to the west.

The block of flats and 2 x 852 type dwellings would be positioned to face Edney's Hill. At present, residential development facing onto Edney's Hill is sparsely found further down the hill. This proposal would see the introduction of a new pattern and grain of development at the top of the hill. This change in development dynamics and incremental approach into Edney's Hill will once again contribute to the erosion of the quality of the transitional point into the landscape. In particular that when travelling down the hill, the last built form before the countryside (excluding the internal road) is the large block of flats, which is inappropriate.

Whilst a proposed street scene elevation has been provided, it is shown in the context of boundary vegetation. The use of screening/ focusing on how well the site is screened has also been referred to elsewhere in the submission. Whilst there was reference by the applicant of the site being well screened, the use of boundary treatment to try and conceal otherwise unacceptable development, that would be at odds with the character and appearance of the area, using landscaping and boundary treatment is not an acceptable solution. Furthermore, the longevity of boundary treatment cannot be, and should not be relied upon. In this case some of the trees and hedges around the site (both on Barkham Road and Edneys Hill) are in the Highway verge meaning they are subject to cutting back or removal outside of the control of the applicant and the site.

Generally, the scheme would see a denser, more cramped, urban layout and design, with more hardstanding in the form of harsh parking blocks, carports, service roads along with a higher quantum of dwellings relative to the site area. As a result, placement of dwellings are relatively close together, rather than providing a spacious feel around plots which is generally the case in this part of Barkham Road. It should be noted that under the previously refused applications, the density equated to between 8-10 dph and the site areas were slightly larger. Under this scheme, the density equates to 23 dph which is not reflective of the site's countryside designation, or being a sensitive transitional point to the wider open countryside to the south.

A flatted block is also proposed, and whilst flatted blocks are common place on urbanised estates, here it would be at particular odds with surrounding rural context where built form does not comprise of such features. Its placement at the entrance of the site would also mean its visibility is heightened on Edney's Hill, where the landscape transitions to the open countryside, as mentioned.

The Arborfield and Barkham Village Design Statement, which is referred to within the Arborfield and Barkham Neighbourhood Plan (policy IRS2), is used as a guide for achieving good quality design of properties in the plan area. The design statement emphasises focuses on architectural features of Barkham and notes *"One and a half" storey houses with dormer style upper windows within the roof space should be encouraged as this reflects the architecture common in Barkham. Houses with high ridgelines should be discouraged as they tend to dominate their surroundings.*

Upon review of the surrounding area, there appears to be architectural and design variance between nearby dwellings, meaning there is not a uniform appearance or design of nearby dwellings. However, that being said there are examples of one and half storey dwellings, and in the immediate vicinity dwellings do have visual interest in their composition. The Village Design Statement goes onto state *Houses with high*

ridgelines should be discouraged as they tend to dominate their surroundings. The proposed ridge height of some of the dwellings being ~11m, which is considered excessive with the roof being extremely bulky. Owing to the site levels which change across the site, a more sensitive design to minimise bulk and reflect the transition of level changes could have been explored. Rather, all dwellings are proposed with a consistently high ridge line, as opposed to any variation or relief that would add design appeal.

Brickwork pattern detailing is noted and positive, however other elements of the design such as window proportions are considered to result in a front elevation that lacks character or a focal point, and are also appear somewhat disproportionately small that fail to break up the massing of the facades. The TVP Designing out Crime Officer also notes that adding more windows to side elevations would enhance surveillance over parking area, however this would need to be balanced against compromising the privacy of existing and future residents.

In terms of proposed materials, policy IRS2 of the Neighbourhood Plans states that materials should be used that reflect local character. This is echoed by policy CP3 and the Borough Design Guide. Concern has been raised that proposed materials do not convincingly reflect the established local palette. While good quality red brick is proposed for some dwellings, consistent with much of Barkham, the inclusion of slate roof tiles and black-stained weatherboarding, particularly on car ports, is discordant with the prevailing use of red clay tiles and the absence of black weatherboarding in nearby properties. Whilst this is noted, there does appear to be some degree of variance in materials on dwellings around the site and the presence of car ports not considered substantially offensive in their own right due to their semi-permeable nature. As noted, some materials that have been proposed are consistent which is positive. Those less so would be contrasting but owing to an existing degree of variation in the surroundings, officers do not consider this to result in substantial harm. However, it would be conditioned that samples of materials are submitted prior to development commencing so that Officers can more fully understand their form and composition in light of neighbouring concerns.

Summary

Previous appeal decisions for smaller scale residential development on this site have been consistently resisted by appeal inspectors, highlighting the large value of this relatively small piece of land in the context of the surrounding area and rural context. Officers consider this is still applicable, albeit the effects of this proposal would be of a greater magnitude owing to the larger scale of this development compared to those previously.

The proposal would contribute towards the key issues experienced in the J2 LCA, one of those being pressure for large scale residential development and supporting infrastructure impact landscape character. The Council do not agree with the impact the proposal would have on the landscape character, with the applicant stating the impact on the J2 LCA would “*no higher than negligible adverse*” owing to the scale of the development and the considered design which is reflective of the village form. Officers consider that the site has an important role to play in terms of landscape character owing to its partially elevated placement and it being a transitional point. Officers also do not agree that the design is considered or reflective of surroundings;

essentially the proposal is for a small estate which is not found nearby or would respect the pattern of existing development. The estate form is more considered an urban arrangement rather than village form.

Paragraph 139 of the NPPF states that *Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design*. The Council are of the view that this development would still not be well designed as it fails to reflect on policies and guidance on design, as discussed.

The design of the dwellings, including associated infrastructure and hardstanding, should recede into the landscape rather than placing very large dwellings, including flatted development, which appear look blocky and stand out contrary to the prevailing character and appearance of the area of detached dwellings in generally good sized plots. It would appear an overdevelopment of the site in this countryside context.

As such, the proposal fails to comply with policies CC03 and TB21 of the MDD and CP3 of the Core Strategy. In addition, the proposal fails to comply with AD3 and IRS2 of the Neighbourhood Plan, Village Design Statement and Wokingham Borough Design Guide. It would also fail to maintain the quality of the environment; one of the overarching aims of policy CP11.

Housing Mix

Policy CP5 of the Core Strategy states that Planning permission will be granted for residential development providing a mix and balance of densities, dwelling types, tenures and sizes.

The applicant's proposed dwelling mix is as follows:

DWELLING SIZE	MARKET HOUSING	AFFORDABLE HOUSING	TOTAL
1 Bed Flat	1	1	2
2 Bed Flat	2	2	4
2 Bed House	0	2	2
3 Bed House	7	1	8
Total	10	6	16

The Berkshire (including South Bucks) Strategic Housing Market Assessment (February 2016) identified future housing need for the Wokingham Borough. Table 107 (on page 295) identifies the following:

No of beds	1 bed	2 bed	3 bed	4+ bed	Total
Dwellings required	934	3488	5605	2862	12889
	7.2%	27.1%	43.5%	22.2%	100%
Subject application	2	6	8	0	16
	12.5%	37.5%	50%	0%	100%

The applicant is slightly overproviding on 1, 2 and 3 bedroom units at the expense of not providing any larger 4 bedroom units. However, given that there is generally a range

of dwelling sizes, including family sized units, and a mix of semi-detached, detached and flatted accommodation would provide a good range of dwelling types, notwithstanding the design concerns raised in particular from the flatted accommodation.

Affordable Housing

CP5 of the Core Strategy states the threshold for affordable housing outside of development locations (ie. in the countryside) is 5 dwellings (net) or more or 0.16 ha (net) and larger. The site exceeds this threshold and as per policy CP5, 40% of the proposed dwellings would be affordable housing units. This equates to 6.4 units.

For this application, the proposal is for 6 affordable housing units:

- 1 x 1 bed flats
- 2 x 2 bed flats
- 2 x 2 bed houses
- 1 x 3 bed house

The 0.4 of a unit would be provided by way of an in lieu contribution which in principle is accepted by the WBC Housing team. The contribution would equate to £113,574.36.

Upon consultation with the WBC Housing team, it has been advised that Council will not accept mixed tenure blocks of flats, it is unlikely that 1 x 1 bed flat and 2 x 2 bed flats would make up a block, it would therefore be prefer additional houses or potentially 2 x 1 bed maisonettes instead of flats plus an additional 3 bedroom house.

The Council would be willing to accept the following affordable housing mix:

- 2 x 1 bed maisonettes
- 2 x 2 bed houses
- 2 x 3 bed houses

However, it is appreciated that the mix above proposed by the housing team currently does not exist (ie. there are no maisonettes proposed as part of this application). As the proposal is unacceptable in other respects, it will form a reason for refusal, however in the event of any future appeal, further discussion between the applicant and housing team would need to take place to agree a position of affordable housing.

The applicant has submitted a proposed tenure mix plan which shows a mix of affordable rent and shared ownership units. The tenure mix required is 70% social rent (4 units) and 30% shared ownership (2 units).

Affordable housing dwellings should be built in accordance with the standards requirements and latest guidance issued by Homes England and/or the Regulator of Social Housing, meet the national space standards and conform to building regulation M4(2) (or any other applicable regulation) to ensure the provision of lifetime homes which are adaptable to varying needs.

The affordable units should be transferred to the Council's Local Housing Company (Loddon Homes) or one of the Council's preferred Registered Provider (RP) partners

for a price that will enable the RP or Local Housing Company to deliver the affordable housing without the need for public subsidy.

Residential Amenity:

Policy CP3 of the Core Strategy states that development should not be of detriment to adjoining land users. This is echoed by DH2 of the LPU. Policies within the Borough Design Guide (BDG) concentrate on standards of accommodation for future occupiers of residential development.

It is important to note amenity requirements for future occupiers of the proposed development and existing neighbours near to a development site both need to be considered.

Future occupiers of the development

Policy TB07 states that “Proposals for new residential units, including change of use or conversions, should ensure that the internal layout and size are suitable to serve the amenity requirements of future occupiers.” This is also echoed by Policy R17 of the Wokingham Borough Design Guide (2012).

R18 of the Borough Design Guide requires sufficient sunlight and daylight to new properties, with dwellings afforded a reasonable dual outlook and southern aspect. Section 12 of the NPPF seeks to promote development that has good architecture and layout with a high standard of amenity for existing and future users and Section 14 states that new development should take account of layout, orientation, and massing to minimise energy consumption.

The proposed dwellings would just meet or exceed the minimum standards outlined in either R17 or the Nationally Prescribed Space Standards. All habitable rooms in the proposed dwellings would benefit from windows and so would receive suitable natural light and outlook.

Amenity space

R16 of the BDG states the Council’s minimum garden length of 11m is a generally accepted guideline for private garden space, provided the space is usable. For flatted development, the BDG states that dwellings should have access to some form of amenity space, preferably in the form of private or communal garden space. In practice, upper floor flat dwellers rarely have access to gardens. In such cases, it is important to provide private outdoor space in the form of balconies, upper level terraces or wintergardens.

The garden depths are generally 11m at their maximum and are of a regular shape so would be useable. In terms of the flatted development, there would be a communal garden that would again have a depth of around 11m, along with the first-floor flats having their own private balconies. As such, the proposed development would have a suitable level of external amenity space for future residents.

However, the balcony for plot 11 would have unrestricted and direct views across the rear gardens of in particular, plot 7, and plot 6, owing to the balcony’s close proximity to the boundary of plot 7. As such, overlooking would occur for the future residents of these plots which is substandard and will form a reason for refusal.

Neighbouring Amenity

The closest neighbours to the site are Quarter Hill House and Coppid Hill House to the west. Coppid Hill House has a detached outbuilding within their plot.

To the east, the closest direct neighbour is 384 Barkham Road with the rear garden boundary of 382 Barkham Road being opposite the proposed site entrance.

To the north, 361 Barkham Road is the closest neighbour and to the south is Mortimers Lodge Farm.

Properties to the west

There would be a separation distance of over 20m between proposed two storey built form and neighbouring properties to the west.

The rear and flank elevations of plots 14, 15 and 16 would face onto the entrance/ side elevation of Coppid Hill House. R16 of the BDG stipulates a minimum back-to-flank separation distance of 12m.

These rear and flank elevations of the plots would see first floor bedroom windows facing this neighbouring property and there would be a separation distance of between 25.5m - 29m between existing and proposed built form. Proposed ground floor facing windows would be intercepted by boundary treatment. During the consultation process, there was concern regarding overlooking onto the swimming pool of Coppid Hill House. Whilst there would be a degree of overlooking from plots 14, 15 and 16, it is commonplace for a residential relationship. For example, Coppid Hill House's adjacent neighbour to the west will also have views of this swimming pool.

The flank elevation of plot 1 would be parallel with Quarter Hill House. However, the side elevation of plot 1 would not contain any windows and so there would not be issues regarding overlooking.

Owing to the adequate separation distances, there are not concerns regarding overlooking or overbearing impacts. The layout of the plots in relation to neighbours does also not raise concern that neighbouring properties would experience a significant loss of light, again also aided by the acceptable separation distances.

Properties to the east

There would be in excess of 30m separation distance between 384 Barkham Road and the closest plots on the application site (plots 6 and 7). Furthermore, these plots would be separated with this neighbouring site by an internal site road, vegetation and Edney's Hill highway.

Properties to the north

To the north, there would also be separation in excess of 35m and the site and neighbouring properties being separated by Barkham Road.

Properties to the south

To the south is Mortimers Farm Lodge. There would be in excess of 50m separation distance between the closest proposed dwelling and this site; intervenes by a parcel of open land.

In terms of general noise disturbance to neighbours, whilst there would be some additional noise/ disturbance as a result of additional households and associated activities, no concerns have been raised in this regard from Environmental Health. Furthermore, in light of the surrounding residential properties, the additional noise would unlikely be substantially above and beyond the current residential setting.

Overall, the proposal would not result in any substantial overbearing, loss of light or overlooking concerns to immediate neighbours.

Environmental Health

Policy CP1 of the Core Strategy states that development should minimise the emission of pollutants into the wider environment. Pollutants could be in the form of, but not limited to, air pollution, noise pollution and ground contamination. Policy CC06 of the MDD specifically concerns noise impacts of a development.

Policy HC5 of the LPU states that Development proposals will only be supported where it can be demonstrated that individually, or cumulatively in combination with other schemes, they do not have an unacceptable impact, either during the construction phase, or when completed, on:

- a) Human health, well-being or safety;
- b) Residential and public amenity;
- c) The quality of land, including soils and the subsurface;
- d) Air and Water quality (including surface water and groundwater); and
- e) Other sensitive receptors, including the natural environment.

Contaminated Land

WBC Environmental Health has reviewed the submitted Phase I & II Geo-Environmental Report (Geo-Integrity, March 2025). The investigation confirms the site has historically been open paddock/field land with some evidence of temporary disturbance during adjacent development. Made ground and shallow groundwater were encountered, but no significant contamination or unacceptable risks to human health or controlled waters were identified. The report concludes the site is suitable for residential use, subject to good practice measures and a watching brief for unexpected contamination. Conditions would have been included relating to reporting unexpected contamination and verification of remediation, in such an event.

Noise

Upon consultation with WBC Environmental Heath, it was concluded that the site is adjacent to Edney's Hill and Barkham Road, which may experience moderate traffic flow. A Noise Impact Assessment should be submitted to assess potential road traffic noise affecting future residents. Mitigation measures (e.g., acoustic glazing, layout orientation) may be required to ensure internal and external noise levels comply with BS8233:2014 and WHO guidelines. No noise assessment has been submitted to support the application and therefore the suitability of the principle of developing this site for residential purposes, in relation to external noise factors, cannot be determined. This will form a reason for refusal.

Conditions would have also been required for a construction management plan, in the interests of the maintaining the quality of the environment during the construction phase, and details of any external lighting so as to not result in adverse impact to neighbours.

Highways, Access and Parking Provision

Notwithstanding WBC Highway's objection to the proposal owing to the site being an unsustainable location, the following comments are made on the proposal in respect of other highways considerations.

Vehicle and cycle parking

Policy CC07 and Appendix 2 of the MDD Local Plan stipulates minimum off street car parking standards, including provision for charging facilities.

Policy C5 of the LPU states that development proposals should provide and retain vehicle parking (including motorcycles) and cycle parking that caters for the needs of all users (including people with disabilities and visitors) that is appropriate to the location and the scale of development.

WBC Highways welcome applicant's parking assessment according to the WBC Parking Standards for Urban location. The council recommends each parking space shall have minimum dimensions of 5.0m x 2.5m, and the minimum internal sizes of a single garage/carport for parking to be 6m x 3m. The minimum dimensions for parallel parking space are 6m x 2.5m.

A total of 26 allocated parking spaces will be proposed for the site, which will be acceptable. The proposed dimensions of the parking spaces and carports are acceptable.

However, according to the floor plans submitted, House Types 1003 and 1358 have five habitable rooms (instead of four as indicated in the Transport Statement and Parking Demand Calculation Sheet), such that 5 unallocated parking spaces (including 3 visitor parking) are required.

To prevent additional parking that obstruct the access road, Highways also recommend reducing the driveway length for Plots 5-7 to no more than 13m, measured from the carriageway edge.

According to the WBC Parking Standards, one cycle parking allocation will be required per dwelling for three or less habitable rooms, and two will be required for dwelling with 4-5 habitable rooms

While it is stated in the Transport Statement that the proposed development includes 36 no. cycle storage, there is no mention of how the cycle parking spaces will be provided. Direct access to the rear garden, cycle store or garage of suitable sizes (7m x 3m) shall be indicated for cycle storage. However, details of cycle provision could be conditioned.

EV Charging Points

Each new dwelling will be expected to provide a minimum of one EV Charging Point under the Building Regulations (Approved Document S).

10 no. EVCP have been proposed for houses on the materials plan. However, 'flats' are considered as 'dwellings' under Section 2 of Building Regulations. Provisions of EVCP for flats are also required.

Traffic Impacts

Traffic flows have been assessed in the Transport Statement, which is welcomed. TRICS data has been used for the proposed trip rates.

While the Highways would have expected the approved trip rates in WBC transport model (WSTM4) to be used for assessment, the proposed trip generation of 8 two-way movements in both the AM and PM peak as stated in the Transport Statement is mostly similar to the total trip generation by applying the approved trip rates, which has been deemed acceptable by WBC Highways in this instance.

Access

The site will be accessed via a new vehicle access onto Edney's Hill, and two pedestrian access onto Barkham Road. While the applicant has assessed the visibility splays of 2.4m x 43m, the proposed vehicle access is circa 45m south to the change in speed limits from 60 mph to 30mph and is subject to the national speed limits.

WBC Highways would expect to see the visibility splays on the nearside edge in both directions of the carriageway to be assessed, with the actual 85th percentile speed of the road. The visibilities along the tangent to the bend shall be assessed.

Edney's Hill is currently serving 23 other dwellings and will serve 39 dwellings if this proposal will be approved, which is a significant intensification of existing access road. The narrowest road width of Edney's Hill between the junction of Barkham Road / Edney's Hill and the site access is circa 4.1m. Edney's Hill (between Barkham Road and the site access) will need to be widened to a minimum width of 4.8m to accommodate two-way traffic.

WBC Highways would expect to review swept path analysis with large saloon car of circa 5m long; the applicant has submitted the swept path analysis with a smaller car, demonstrating that two vehicles travelling in opposite directions can pass through each other when entering and leaving the public highway at the first 10m of the site access.

Internal Access Road

Information on whether or not the site roads will be offered for adoption will need to be supplied. Whatever the case, the road will need to be built to highway standards. If the site roads are to remain private, this will also need to be included in a s106 agreement. Any S106 will need to include an obligation that the site road will be maintained as a private road in perpetuity. As this has not been secured, it will form a reason for refusal.

The internal roads are proposed to be shared surface with a minimum width of 4.8m along the primary access road to accommodate two-way traffic, which are welcomed.

It is stated that there is a narrowing pinch point of 3.7m wide to the northwest of the proposed development. Given that driveway will provide access to four dwellings, a minimum width of 4.1m is required. A 2m service margin shall be provided on both sides of the road where development is proposed to align with the borough's highway design guidance.

While the swept path analysis for fire tender has been submitted along the access road of Plots 8-16, the applicant is expected to demonstrate the manoeuvring of a fire tender vehicle entering and leaving the site access in forward gear to within 40m reach to the furthest point of any dwelling (Plots 1-7 for this instance). A turning area is likely required.

Pedestrian accesses are solely provided onto Barkham Road. While the applicant proposed that the internal roads will be shared surfacing, this is no direct internal pedestrian/cycling route for the future occupiers to access to the pedestrian accesses from the south of the site, Plots 14-16 in particular, which can increase the risks for pedestrians/cyclists utilising the proposed vehicle access onto Edney's Hill.

The applicant is therefore required to improve the connectivity within the site. The applicant may wish to consider maintaining a minimum width of 4.8m along the access road of Plots 8-16 and providing a 3m wide shared footpath/cycle path between Plots 4 and 5.

Waste Provision

Policy CC04 of the MDD Local Plan requires development to incorporate suitable waste management facilities, including on-site recycling. Green waste provision should also be provided for, although this is an optional facility for individual households.

Each dwelling will be responsible for their own waste provision and presenting waste for collection at the appropriate time. In any flatted development, communal stores would be expected. Bin storage areas for both the single dwellings and flatted development have been demonstrated.

The proposed layout can generally be served by fire tender and refuse vehicles (of similar dimensions to the council's adopted standards) within acceptable carrying distance.

While the applicant has submitted a swept path for refuse vehicle entering the site, the applicant has not demonstrated the refuse vehicle can exiting the site travelling along the northbound of Edney's Hill, and the turning is unlikely to be achievable with the proposed access arrangement. This will be encompassed within the Highway reason for refusal.

Other Highway Matters

A framework construction management plan (CMP) was requested by WBC Highways. However, it is considered that had the development been acceptable a CMP could have been secured via condition. This would ensure that safety and neighbours are considered during the construction process.

Summary

In the absence of adequate information regarding satisfactory access arrangements, visibility splays and turning area for vehicles entering/exiting the site, it has not been demonstrated that the proposal will not lead to a detrimental impact on both highways and pedestrian safety. The proposal is contrary to policy CP1, CP3 and CP6 of the Core Strategy, policy CC04 of the MDD and the National Planning Policy Framework.

Flooding and Drainage:

Policy CC09 of the MDD states that All sources of flood risk, including historic flooding, must be taken into account at all stages and to the appropriate degree at all levels in the planning application process to avoid inappropriate development in areas at risk of flooding.

Policy CC10 of the MDD states that all development proposals must ensure surface water arising from the proposed development including taking into account climate change is managed in a sustainable manner. This must be demonstrated through a) A Flood Risk Assessment, or b) Through a Surface Water Drainage Strategy.

The site and access thereto is in Flood Zone 1 which is defined as land having a less than 1 in 1000 annual probability of river flooding or tidal flooding in any given year meaning its probability of flooding is 'low'.

Sequential and Exception Test

As the site is in Flood Zone 1, a sequential test, demonstrating sequentially preferable sites in a lower risk of flooding, is not required. The development (a residential scheme) is classified as a 'More Vulnerable Development' according to Table 2 within the PPG (Flood Risk and Coastal Change section) and Annex 3 lists Flood Risk vulnerability. According to Table 2, 'More Vulnerable Development' is compatible in Flood Zone 1 and therefore an exception test is not required.

Flood Risk

As the site area is greater than 1 ha, a site specific Flood Risk Assessment (FRA) is required, despite the site being located in Flood Zone 1, as per footnote 63 of the NPPF.

A Flood Risk Assessment was carried out and concluded the different risks of flooding from different sources including fluvial, surface water, ground water and reservoir were all low.

Surface Water Drainage

The NPPG states that the aim should be to discharge surface water run-off as high up the drainage hierarchy as reasonably practicable. This is as follows:

- Discharge to the ground
- Discharge to a surface water body;

- Discharge to a surface water system, highway drain, or another drainage system, or;
- To a combined sewer where there are absolutely no other options, and only where agreed in advance with the relevant sewerage undertaker.

Thames Water would also raise no objection to the treatment of surface water should the sequential approach to the disposal of surface water.

The drainage strategy states that the site's geology suggests that the ground conditions are not suitable for infiltration techniques. Soakaway tests were performed at three locations on site, confirming that the porosity properties of the soil are unsuitable for infiltration techniques.

As such, a detention basin is proposed in the southeast corner of the site where the topography naturally directs surface water. Furthermore, an underground attenuation tank will be provided in order to provide the required volume for surface water storage during extreme storm events. Three 'hydrobrakes' will be installed in a manhole to attenuate the site's run-off to the relevant greenfield rates.

Permeable paving is also proposed along with rainwater butts to be provided in all dwellings, re-using rainwater for irrigation purposes.

The drainage strategy also incorporates a surface water maintenance strategy to ensure the systems suitably perform.

Whilst concerns raised by neighbours are noted, WBC Drainage officers have reviewed the submitted drainage flood risk assessment and drainage strategy and raise no objection to the proposal, subject to a condition that the development is carried out in accordance with the submitted strategy.

Thames Water have stated that they would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer and have requested an informative be attached to remind the developer that a Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer.

Thames Water also advise that with regard to wastewater network and sewage treatment works infrastructure capacity, they would not have any objection to the application.

Trees:

Policy CC03 of the MDD seeks to protect existing trees and promote opportunities for new soft landscaping.

The Tree Survey Schedule consists of 21 trees, 4 groups of trees, 1 hedge of Cherry Laurel. 1 x category C tree will be removed as part of the proposals (T18 – Hazel) along with partial clearance of G2 and G3 which are also category C. G2 is a native hedge consisting of Ash, Field Maple, Hawthorn, Hazel, Holly, and Silver Birch. G3 includes Elm, Ash, Oak, Field Maple, Hawthorn, Hazel and Holly. The removals are necessary to accommodate the scheme's vehicular access and a pedestrian connection with Barkham Road.

The WBC Tree & Landscaping Officer has no objection to the removal of these low quality trees, and the proposal can accommodate all the principle trees and provide for replacement trees.

It is worth noting that there are two Oak trees in the south-west corner of the site identified as Veteran trees on the Ancient Tree Inventory, Refs. 163180, 163179. Along Edneys Hill is an Oak identified as Notable on the ATI Ref. 45697 and a Veteran Oak Ref. 45698. The mature 'Veteran' Oak (T20 on the submitted arboricultural plan) is considered to give the site a strong sense of verdant maturity and contributes to the site's amenity. Although it is the opinion of the Arboricultural Consultant T20 does not have sufficient features to qualify as a Veteran tree under the definition set out in the NPPF the tree it has been provided with a buffer zone x15 the dbh, as recommended for veteran trees by Natural England.

Off site trees opposite the site are protected by TPO761/1995 consists of Ash, Hazel, Plum, Holly, Lime. These trees are located along Aggisters Lane a PRoW BARK 19, a historic route in Barkham that links to Bearwood Road, as well as to the Coombes an area of ancient and semi-natural woodland. Trees and woodland are common features within the J2 LCA, but also in the immediate site context and along Barkham Road which has woodland, groups of trees, and rows of trees lining individual plots and open stretches of road, and single mature Oak trees, many of which are protected and include some Veterans.

Impact on Root Protection Areas (RPAs)

In addition to the removals are incursions into root protection areas from the development and these are listed in Table 2 of the AIA. The Tree Protection Plan demonstrates incursion into the RPA of T19, and T17 from the access excavation and the road, and incursion into T17, T16, from the new access road. In addition to T20, these two trees are two of the more consequential trees on the site. The TPP calculations have included an area for offsetting of the RPA into soft ground of the site, but what is gained in the offsetting is lost on development particularly around T16.

The other incursions are minor and 'Cellweb' is proposed in locations where there is incursion from hard surfacing. As the key trees on the site are arguably along the eastern boundary it's unfortunate the site layout has placed the internal road close to the trees, rather than avoiding the RPA altogether which is what BS5837:2012 states;

Section 5.3 'Proximity of structures to trees' states at 5.3.1 'The default position should be that structures are located outside the RPAs of trees to be retained. However, where there is an overriding justification for construction within the RPA, technical solutions might be available that prevent damage to the trees'.

There is no overriding justification for the current proposals to develop within the RPA of important trees on site particularly when it can be avoided.

Trees and visibility splays

There are visibility splay drawings within the Transport Report Drawing Ref.

1052.0002-0001 P02, however the information must be included on the tree protection plan as well to understand the impact on the existing trees, which consequently could have an impact on the character of Edneys Hill. Removing the trees to facilitate an entrance that meets with highway policy will change the character of Edneys Hill, as will the additional activity in a rural country lane.

In summary, whilst the scheme indicates a minimal loss of category C trees, which is deemed acceptable, the proposal has failed to demonstrate that it would be acceptable in relation to retained trees owing to development being present within the RPA of good quality onsite trees. Furthermore, impact on existing trees has failed to be considered in relation to required visibility splays. As such, the proposal has not demonstrated compliance with CC03 of the MDD and will form a reason for refusal.

Ecology:

Policy TB23 of the MDD seeks to incorporate biodiversity features and provide suitable buffer zones with designated sites and species of particular importance. Policy CP7 of the Core Strategy seeks to protect designated sites and will resist development that may harm habitats or species of principle importance.

The proposal has been reviewed by the WBC Ecologist and the following comments are made in relation to protected species.

Bats

In the Ecological Appraisal, the desktop survey has identified a number of bat species as being recorded locally. Council records indicate that some of the nearby bat records are of local bat roosts. Despite the desktop survey results, the site itself has not been subject to a bat activity survey. In the absence of survey effort demonstrating otherwise, the WBC Ecologist advises that the planning authority has to proceed on the basis that the site does provide foraging and commuting interest for bats.

Considering the proposed layout, the WBC Ecologist agrees with the applicant's ecologist that the main commuting routes for bats can be retained in the course of the development provided that an appropriate lighting for light sensitive species strategy is secured and implemented. This would have been secured via condition.

Badger

No Badger setts have been identified on or immediately adjacent to the site. The use of the site for foraging by Badgers cannot be ruled out. On this basis, mitigation measures are proposed during construction that are relevant to Badgers. If these mitigation measures are secured then the WBC Ecologist advises that the proposal will be unlikely to harm a Badger. As mitigation measures are recommended for a number of species and these also need to be framed within the timescales and other constraints of the construction programme, As such, a detailed protected species mitigation measures are secured via a Construction Environmental Management Plan (CEMP) condition would be required to ensure that they are appropriately synthesised into the site specific construction plan.

Reptiles

The Ecological Appraisal has not conducted a presence / likely absence survey for

the site. It does pick up that widespread reptile species are recorded relatively locally and that the perimeter of the site does provide some suitable reptile habitat. The WBC Ecologist recommends that, in the absence of survey effort demonstrating likely absence, the local planning must proceed on the basis that reptiles are present on site. It is agreed that the layout proposed can retain most of the suitable habitat for widespread reptiles on-site – provided management for reptiles is included as an objective in a Habitat Management and Monitoring Plan (HMMP) for the open spaces on-site.

If reptile mitigation during construction is secured via a CEMP condition and ongoing management for reptiles secured via a HMMP, the WBC Ecologist advises that the proposal is capable of maintaining the local conservation status of reptile species of principal importance.

Great Crested Newts

The application site falls within amber and green impact risk zones for great crested newts, indicating suitable habitat and potential presence of this protected species. There are no ponds within the application site and five ponds within 500m of the site boundary, the nearest of which is approximately 190m south-west.

The applicant has supplied an Ecological Appraisal (Ref: ESEC/24084/01/v1.0, Essential Ecology, April 2025) which states that the risks from the proposed development to great crested newts are low and recommends precautionary measures which have been detailed in a non-licensed method statement. The Ecologist (NatureSpace) are satisfied with this Ecological Appraisal and the recommendations therein as regards great crested newts. A condition would be required to ensure the development is carried out in accordance with the recommendations for Great Crested Newts.

From the above assessment, it can be concluded that the proposal would not result in adverse harm to protected species.

Species Specific Enhancements and Ecological Permeability

Section 7.2 of the submitted Ecological Appraisal makes recommendations for ecological permeability measures and species specific enhancements. Local plan policy TB23 sets out a requirement for new development to provide enhancement and ecological permeability. It is therefore appropriate to secure these measures. Currently the measures are not set out in detail. A condition to resolve the detail and implement the enhancements and ecological permeability measures as approved would be required.

Biodiversity Net Gain

Mandatory biodiversity net gain of 10%, as outlined in the Environment Act 2021, applies to this development proposal.

The WBC Ecologist has made a line-by-line comment has been given in a LPA comment copy of iteration v1.0 of the Statutory Metric. The Ecologist can recommend that the habitat types, condition scores and areas listed in the baseline tabs A1 and B1 can be agreed. However, there is concern that T20 has not been included in the A1 tab. Although both the Ecological Appraisal and Arboricultural Impact Assessment try

to claim it is off-site, the red line boundary is drawn through the stem in plans and I therefore it is the LPA's view that this does need to be included.

The Ecologist also recommends that it is a size to be considered as a veteran tree and irreplaceable habitat. The BNG Irreplaceable Habitat Regulations allowing for any one of three pathways (size, condition, supporting rare species) being used to recognise a veteran tree. Considering condition, it is relevant to note that the Arboricultural Impact Assessment (Aspect Arboriculture, ref: 12357_AIA.001, April 2025) makes the following observations:

*“Several previous failure wounds throughout crown
Above average deadwood
Cavities within buttress on southern aspect of base”*

This indicates that it may also qualify as veteran under the condition pathway. It does not appear to have been surveyed specifically for rare species so this pathway cannot be excluded either.

If T20 is included within the baseline assessment of the BNG Statutory Metric, then the Local Planning Authority can agree the baseline. At present, the BNG baseline cannot be agreed.

It is noted that a detailed assessment of the post-development scenario is included within v1.0 of the submitted metric. Agreement/approval of this post-development part of the metric would need to be via condition discharge, should permission be granted and therefore the WBC Ecologist has not provided a detailed review of these tabs. However, it is noted that does rely on creation and enhancement of medium distinctiveness habitats on-site. As such, should permission have been granted, a condition would have been required to secure a detailed Habitat Management and Monitoring Plan (HMMP) and a planning obligation is agreed to secure delivery and monitoring of the HMMP including covering the local planning authority's monitoring costs.

Given the proposal is unacceptable in other respects, revisions of the BNG metric were not sought. As such, it will need to form a reason for refusal.

Thames Basin Heath Special Protection Area (TBH SPA)

Policy CP8 of the Core Strategy states that development which alone or in combination is likely to have a significant effects on the Thames Basin Heaths Special Protection Area will be required to demonstrate that adequate measures to avoid and mitigate any potential adverse effects are delivered.

The site is located within the 5km zone from the Thames Basin Heaths Special Protection Area (TBH SPA). The Thames Basin Heath Special Protection Area is an internationally important habitat that is home to 3 rare species of ground nesting birds - the Dartford Warbler, Nightjar, and Woodlark. To protect these, the government has designated the Thames Basin Heaths as a Special Protection Area (SPA) under the European Commission Birds Directive and placed mitigation zones around the heaths to lessen the impact of human activity on them. The Appropriate Assessment needs to be passed to ensure that development would not have adverse impact on the TBH

SPA.

The Council, as the competent authority, has to ensure the Appropriate Assessment is passed before a development is permitted.

The submitted Ecological Appraisal proposed to secure mitigation for likely significant effects on the TBH SPA as per the standard delivery framework of providing SANG and SAMM. It proposes to secure SANG capacity at Rooks Nest Wood via a contribution secured by planning obligation. The site is within the catchment of Rooks Nest Wood SANG. Should the Council not wish to supply SANG capacity from Rooks Nest Wood SANG, another strategic SANG will need to be identified and the applicant will need to show that this meets the standards required for it to be viable SANG for this site.

The Appropriate Assessment has not been passed in the form of a S106 agreement to secure mitigation for the TBH SPA and as such this will form a reason for refusal as per local plan policy CP8 and the Habitat Regulations 2017 (as amended).

Heritage – Archaeology:

Policy TB25 of the MDD states that Where development is likely to affect an area of high archaeological potential or an area which is likely to contain archaeological remains, the presumption is that appropriate measures shall be taken to protect remains by preservation in situ. Where this is not practical, applicants shall provide for excavation, recording and archiving of the remains.

The proposal has been reviewed by Berkshire Archaeology.

There are potential archaeological implications with this proposed development as demonstrated by Berkshire Archaeology's Historic Environment Record and as noted on previous applications (162084 and 161412) for this site, however the current proposal is for a larger development. The site lies in a relatively non investigated area archaeologically and therefore its potential remains unclear.

However, a Medieval Deer Park lies c130m west of the site, centred around Barkham Manor. The Saxon village of Barkham, including a Medieval moated site, is c.690m south, and widespread field walking survey has highlighted Medieval finds are common in the wider area. In addition, a Medieval or early Modern trackway from Swallowfield to Wokingham is depicted on Norden's Map of 1607 running east-west, c.600m to the north of the site. These all suggest there is a potential for Medieval archaeology, and, although this is not a largescale development, it is likely the plot has never previously been developed, and therefore any archaeology may remain undisturbed.

As such, had the proposal been acceptable a pre-commencement condition would have been attached until a programme of archaeological work, including a Written Scheme of Investigation (WSI) has been submitted to, and approved by, the local planning authority in writing.

Employment and Skills Plan

Policy TB12 of the MDD Local Plan requires an employment skills plan (ESP) for this

development. Policy ER4 of the LPU also states that development of more than 10 dwellings should be accompanied by an ESP to show how the proposal provides opportunities for training, apprenticeships or other vocational initiatives to develop local employability skills required by developers, contractors or end users of the proposal.

ESP uses the Construction Industry Training Board (CITB) benchmark based on the value of construction.

The value of construction (to inform ESP outcomes) is calculated as it is calculated by multiplying the interior floor space by £1025 which is the cost of construction per square metre as set out by Building Cost Information Service of RICS.

As such, had the proposal been acceptable, a S106 obligation for an ESP or in lieu contribution would have been secured via S106. However, as this was not proceeded with, it will form as a reason for refusal of the application.

Building Sustainability

Policy CC04 of the MDD Local Plan and the Sustainable Design and Construction SPD require sustainable design and conservation and R21 of the Borough Design Guide SPD requires that new development contribute to environmental sustainability and the mitigation of climate change.

Policy CC04 outlines that in respect of new homes, the follow should be achieved:

- a) Seeking to achieve the requirements of the full Code for Sustainable Homes Level 4;*
- b) Meet internal potable water consumption targets of 105 litres or less per person per day (as part of the requirement to meet full Code for Sustainable Homes Level 4).*

Policy CC05 of the MDD Local Plan encourages renewable energy and decentralised energy networks, with encouragement of decentralised energy systems and a minimum 10% reduction in carbon emissions for developments of 10+ dwellings.

In relation to policy requirements outlined in CC04, it should be noted that the Code for Sustainable Homes Level 4 has now been withdrawn, and now applicants must meet the interim Future Homes Standard (as required by Building Regulations) of a minimum 31% reduction in emissions, in line with the CCIPPS. This would have been secured via condition.

With regards to water consumption, internal water use for each dwelling at a standard of less than 105 litres per person per day would have been needed to be factored into the final reserved matters scheme. This water consumption standard to comply with the CCIPPS, which is a higher standard than that outlined in CC04. This is because Wokingham Borough is situated within part of the country classified as an area of serious water stress. This would have too been secured via condition to help reduce water stress.

To comply with policy CC05, decentralised energy sources are required to be factored into the final scheme and secured via condition. Within the applicant's Energy Statement, it is indicated that Air Source Heat Pumps (ASHP) would be used in dwellings. However, on the submitted plans, solar panels are indicated on the

dwellings, despite the energy statement stating that whilst solar panels are a suitable option, they would not be proceeded with.

As such, there is a contradiction between the submitted Energy Statement and submitted drawings.

No location plan or specifications of the air source heat pumps are provided. This was noted in neighbour comments. Had the proposal been acceptable, a condition would have been applied to ensure the development achieves a 10% energy reduction through renewable technologies, and it would have specified that locations, specifications provided.

Despite the contradiction in the submission, it does appear that decentralised energy sources have been considered, and would be used, with further details being secured via condition.

In light of the above assessment, in principle the proposal could accord with Policy CP1 of the Core Strategy and CC04 and CC05 of the MDD subject to conditions.

Infrastructure:

NHS

NHS Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board have raised no objection to this application subject to the applicant providing a financial contribution of £14,499 towards primary healthcare (to be secured via a S106 obligation). The contribution would be used towards Wokingham Medical Centre or an identified primary care estates project in the local area.

Whilst requested, Officers are still required to justify this contribution against local planning policy and against the tests for such obligations. In terms of local policy, there are no specific policies that relate to development and healthcare. Policy CP3 (h) discusses that proposals should contribute towards the provision of an appropriate sustainable network of community facilities of the Within the supporting text of Policy CP1 it states that *“Development within the borough should enhance the overall sustainability of the area through minimising impact on the environment, including access to facilities.”* As this development will result in increased pressure on this community health facility, the contribution is justified to make the scheme functional in that it will be self-sufficient in helping alleviate the pressure and therefore will not be detrimental to the health wellbeing of the existing community.

Turning to the Regulation 122 of the Community Infrastructure Levy Regulations 2010, it states that obligations can only be attached if complied with the following tests:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development.

The proposed development of 16 dwellings will increase the population by an estimated 39. This will impact on primary health care infrastructure as there is insufficient capacity

to accommodate the additional patients. For the avoidance of doubt, the NHS state that the impact of this development cannot be absorbed by the nearby GP Practices.

Necessary

NHS ICB have confirmed that Wokingham Medical Centre is already over-capacity and requires additional clinical space to accommodate any new patients from the proposed development. The request does not seek to resolve existing capacity issues, rather looks to secure mitigation to provide necessary additional clinical space to accommodate any new patients from the proposed development.

Directly related

The proposed development would result in increased population that would need to access primary health care provision. As health provisions in the area are already over-capacity, a contribution would be required to ensure the resultant increase in population can readily access the services required. The contribution will therefore be directly related to the proposed development.

Fairly and reasonably related in scale and kind

The requested contribution is based upon the no. of dwellings forming part of the proposed development to define an additional patient yield. The cost per dwelling is based upon expected average occupancy of the development (2.4 persons).

Moreover, the recent local appeal decision at Land North of Bath Road, Wokingham APP/X0360/W/24/3350170 considered a similar situation where the impact of a housing development was considered to have an impact on an existing local surgery which the NHS ICB had confirmed to be already overcapacity. The contribution sought in that instance had been calculated based on the number of dwellings proposed which has been used to define an additional patient yield that would compound the existing problem of overdemand for local surgery services. The Inspector concluded that *"taking into account the representations made, as well as the approach adopted by the Inspector in the case of the Haddenham appeal, I am satisfied that this obligation would meet the necessary tests."*

The LPA consider the proposed obligation meets the relevant tests. As such, its failure to be secured via a s106 legal agreement will form a reason for refusal of the application.

A number of comments from third party comments have raised objection due to concern that existing local amenities would not be able to accommodate the increase in population. It is worth noting that the scheme would be liable to pay a Community Infrastructure Levy (CIL) charge of £551.02/m². CIL contributions are used to cover the cost of infrastructure it will rely upon, such as roads and schools. Town and Parish Councils will also receive a meaningful proportion of the money raised. This can be up to 25 percent of receipts in areas with an adopted Neighbourhood Plan, such as Finchampstead. Individual parish websites can be checked in order to see the parishes individual annual CIL statement setting out the amount of CIL received, how much was spent and what it was spent on. As such, through the payment of CIL, the development will contribute to local amenities.

Other Matters

The Thames Valley Police Designing out Crime Officer made suggestions to ensure boundary treatment is secure, that a self-closing gate would be added to the communal garden of the block of flats and secure access to the communal areas of the block of flats. Further detail on such security measures could have been conditioned, along with appropriate boundary treatment.

Planning Balance

The Council cannot demonstrate either a 5 year housing supply and therefore the development must be assessed in line with Paragraph 11d(ii) and against the policies in the NPPF taken as a whole. The three overarching objectives contained within paragraph 8 of the Framework seek to balance growth and local community needs against protection of the natural, built and historic environment. The benefits and disbenefits are therefore considered against these three broad topic areas below.

Whilst the policies which are most important for determining the application are out of date by virtue of the absence of a 5 year housing land supply, that does not mean the policies carry no weight. The weight attached to the development plan policies is a matter for the decision maker(s).

Economic:

The proposal would result in economic benefits. This is broadly set to arise from the short-term economic contribution of the construction of 16 dwellings via construction industry jobs. In the longer term, future residents of 16 dwellings would contribute to the viability and vitality of businesses in the area. Although these are not unique to this scheme, the size of the development means these benefits are not insignificant and the development is therefore considered to perform a positive economic role in this part of the borough and is considered to hold moderate weight in the planning balance.

Social:

The provision of 16 new dwellings, including a desire to provide a policy compliant level of affordable housing, would positively assist in furthering the social objective of sustainable development in principle. However, owing to the site's unsustainable location in terms of access to facilities and amenities, the site is suboptimal for sustainable residential development which future occupiers would experience. Furthermore, at present, the proposed affordable housing mix is not supported by the WBC housing team, which at present makes it unclear that the proposal would in reality provide a suitable level and mix of affordable units.

Whilst the provision of additional homes in the borough in their own right holds substantial weight in the planning balance, officers are of the view that these homes need to be located in appropriate, sustainable locations. Because this has not been achieved, the level of weight attributed to the social benefit of providing housing is reduced to moderate weight.

Environmental:

The proposal would result in dwellings that would incorporate decentralised energy sources, albeit due to the contradiction in the submission it is not clear exactly what this would entail and as such holds limited weight in the planning balance.

Disbenefits

The site is located out of settlement and in the countryside, and as such conflicts with the current spatial strategy. It represents an unsustainable location for residential development and would result in a degradation of the important rural gap/ visual break in the landscape and surrounding area which has been noted as important by numerous appraisal inspectors. The site represents an important transitional point to the wider countryside to the south, and aside from the presence of built form having an urbanising effect, the scale and density of development further exacerbate this concern, resulting in a layout and form that is at odds with surroundings and not appropriately landscape led, where some occupiers could result in a lack of privacy and good quality trees of site would be adversely affected. As such, officers consider it would fail to maintain the quality of the environment, and therefore conflicts with this overarching aim of policy CP11 and in turn policy IRS1 of the Arborfield and Barkham Neighbourhood Plan.

It also represents an unsustainable location for residential development owing to its substandard access to facilities and amenities by sustainable transport modes. It also fails to demonstrate how the site would satisfactorily meet highway standards in various respects.

Other shortcomings relate to lack of s106 obligations that interrelate to the 3 pillars of sustainability outlined above.

Conclusion:

The most important policies for determining the application are out of date by virtue of the absence of a 5-year housing land supply. Paragraph 11 of the Framework therefore states that permission should be granted unless any adverse impacts of doing so would **significantly and demonstrably** outweigh the benefits, when assessed against the policies in the Framework taken as a whole, with having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.

When having 'particular regard' to the tilted balance and the themes outlined in paragraph 11(d)(ii), it can be seen that it conflicts in all aspects. The site is an unsustainable location for residential development, not an effective use of land; rather it would consume a visually valuable greenfield open field in the countryside, it fails to result a well-designed scheme owing to the urbanisation that would occur owing to the urbanised and out of character layout and built form, and lastly it has not secured an appropriate mix of affordable homes.

Whilst there are benefits of the scheme, the weight attributed to some of these benefits is reduced owing to specific shortcomings (ie. the weight attributed to the provision of housing is reduced due to the dwellings not being sustainably located for future occupiers) and so the housing proposed is sub-par in respects. The benefits are then required to be balanced against the disbenefits. When undertaking the tilted balance exercise, the adverse impacts of approving this scheme would **significantly and demonstrably** outweigh the benefits and as such, the recommendation is therefore to refuse planning permission.

Community Infrastructure Levy (CIL): When planning permission is granted for a development that is CIL liable, the Council will issue a liability notice as soon as practicable after the day on which the planning permission first permits development. Completing the assumption of liability notice is a statutory requirement to be completed for all CIL liable applications.

The Public Sector Equality Duty (Equality Act 2010): In determining this application the Council is required to have due regard to its obligations under the Equality Act 2010. The key equalities protected characteristics include age, disability, gender, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief. There is no indication or evidence (including from consultation on the application) that persons with protected characteristics as identified by the Act have or will have different needs, experiences, issues and priorities in relation to this particular planning application and there would be no significant adverse impacts as a result of the development.

RECOMMENDATION

Conditions agreed:

Not required

Recommendation:

Refuse for the following reasons:

1. The proposal represents inappropriate, unplanned development outside of development limits within the countryside and contrary to the spatial objectives of the development plan and to policies CP1, CP9 and CP11 of the Core Strategy, policy CC01 of the MDD Local Plan, Policy IRS1 of the Arborfield and Barkham Neighbourhood Plan and the NPPF.
2. The proposed development would have an adverse impact on the landscape, character and appearance of the area by reason of the loss of an open green field in the countryside to an urbanising, poorly designed development, contrary to policies CP1, CP3 and CP11 of the Core Strategy, policies CC01, CC03 and TB21 of the MDD Local Plan, policies AD3 and IRS2 Arborfield and Barkham Neighbourhood Plan, Barkham Village Design Statement, the Wokingham Borough Design Guide Supplementary Planning Document (2012), the Wokingham Borough Landscape Character Assessment and the NPPF.
3. The location of the proposed development is unsustainable in transport terms as the proposed development is not within suitable distances of day-to-day local facilities and amenities, including areas of public open space, by non-motorised transport modes, and will result in a high level of car dependency contrary to the sustainable goals in

	Section 8 and 9 of the NPPF, as well as policies CP1, CP2, CP3 and CP6 of the Core Strategy and TB08 of the MDD Local Plan. 4. In the absence of adequate information regarding satisfactory access arrangements, visibility splays and turning area for vehicles entering/exiting the site, it has not been demonstrated that the proposal will not lead to a detrimental impact on both highways and pedestrian safety, and that the development can be adequately serviced in terms of waste provision. The proposal is contrary to policies CP1, CP3 and CP6 of the Core Strategy, policy CC04 of the MDD and the NPPF. 5. The proposed balcony serving plot 11 would result in uninterrupted views across the proposed gardens of plots 6 and 7 and therefore the privacy for future occupiers would be compromised, contrary to policy CP3 of the Core Strategy and the Wokingham Borough Design Guide Supplementary Planning Document (2012) and the NPPF. 6. The applicant has failed to demonstrate that future occupiers of the proposed development would not be subject to adverse noise from the existing surrounding environment. The proposal is therefore contrary to policy CC06 of the MDD Local Plan, policy CP1 of the Core Strategy and the NPPF. 7. The proposal fails to demonstrate that the development can be suitably accommodated within the site without impinging on root protection areas, resulting in adverse and unacceptable impacts on important trees. Furthermore, impact on existing trees has failed to be considered in relation to required highway visibility splays. As such, the proposal fails to comply with CC03 of the MDD Local Plan and NPPF. 8. In the absence of a planning obligation to secure suitable avoidance and mitigation measure and access management monitoring arrangements, in terms that are satisfactory to the Local Planning Authority (LPA), the LPA is unable to satisfy itself that the proposals include adequate mitigation measures to prevent the proposed development from having an adverse effect on the integrity of the Thames Basin Heaths SPA, in line with the requirements of Regulation 63 of the Conservation of Habitats and Species Regulations 2017 as amended and Article
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	6(3) of Directive 92/43/EEC. The proposal would be contrary to Policy NRM6 of the South East Plan, Policies CP8 and CP4 of the Core Strategy. 9. By virtue of a lack of accurate information, an assessment of how 10% biodiversity net gain will be achieved is not possible and as such, the survey assessment is not acceptable and therefore the relevant date of pre-development biodiversity value is not agreed. As such, if granted planning permission, there is no guarantee if 10% biodiversity net gain will be achieved, hence would be contrary to Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). 10. In the absence of a completed Legal Agreement, the schemes fails to make adequate provision for highways infrastructure, contrary to Policies CP1, CP3, CP4 and CP6 of the Core Strategy the NPPF. 11. In the absence of a completed legal agreement, the scheme fails to make adequate provision towards primary medical care to accommodate for the increase in population as a result of the development. The proposal is therefore contrary to policy CP1 of the Core Strategy and the NPPF. 12. In the absence of a completed legal agreement, the scheme fails to make adequate provision for affordable housing, contrary to Policy CP5 of the Core Strategy and the NPPF. 13. In the absence of a completed legal agreement, the proposal fails to secure opportunities for training, apprenticeships and other vocational initiatives to develop local employability skills contrary to policy TB12 of the MDD Local Plan.
Date:	15 October 2025
Earliest date for decision:	21 August 2025

Recommendation agreed by: (Authorised Officer)	
Date:	16/10/25

The Conservation of Habitats and Species Regulations 2017 Screening Assessment and Appropriate Assessment

In the light of the “Sweetman Judgement” (People Over Wind and Sweetman v Coillte Teoranta, April 2018), the comments below comprise an Appropriate Assessment which includes advice on necessary avoidance and mitigation measures which is consistent with the advice provided to the Planning Inspectorate on such matters.

Summary of Response

WBC, in consultation with Natural England, has formed the view that any net increase in residential development between 400m and 5km straight-line distance from the Thames Basin Heath Special Protection Area (SPA) is likely to have a significant effect on the integrity of the SPA, either alone or in-combination with other plans or projects. An Appropriate Assessment has been carried out which includes regard to mitigation requirements.

This site is located approximately **4.9 km** (measured from the access road to the application site) from the boundary of the SPA and therefore is likely to result in an adverse effect on the SPA, unless it is carried out together with appropriate avoidance and mitigation measures.

On commencement of the proposed development, a contribution (calculated on a per-bedroom basis) is to be paid to Wokingham Borough Council (WBC) towards the cost of measures to avoid and mitigate against the effect upon the Thames Basin Heaths SPA, as set out in WBC’s Infrastructure Delivery Contributions Supplementary Planning Document (SPD).

The strategy is for relevant developments to make financial contributions towards the provision of Suitable Alternative Natural Greenspaces (SANGs) in perpetuity as an alternative recreational location to the SPA and financial contributions towards Strategic Access Management and Monitoring (SAMM) measures.

In this instance, the proposed development would result in a net increase of **2 x 1 bedroom dwellings, 6 x 2 bedroom dwellings and 8 x 3 bedroom dwellings** within 5km of the SPA which results in a total SANG contribution of **£36,960.94**.

The proposed development is required to make a contribution towards Strategic Access Management and Monitoring (SAMM) which is also calculated on a per bedroom basis. Taking account of the per bedroom contributions this results in a total SAMM contribution of **£14,640**.

The total SPA related financial contribution for this proposal is **£51,600.94**. The applicant **must agree** to enter into a S106/s111 agreement to secure this contribution prior to occupation of each dwelling. Subject to the completion of the S106 agreement, the proposal would not lead to an adverse effect on the integrity of the SPA and would comply with SEP Saved Policy NRM6, policy CP8 of the Core Strategy, and the NPPF.

1. The Conservation of Habitats and Species Regulations (2017) as amended

In accordance with The Conservation of Habitats and Species Regulations (2017) as amended, Regulation 63, a competent authority (in this case Wokingham Borough Council (WBC)), before deciding to undertake, or give any consent, permission or other authorisation for, a plan or project which—

- a. is likely to have a significant effect on a European site...(either alone or in combination with other plans or projects), and

b. is not directly connected with or necessary to the management of that site.

must make an appropriate assessment of the implications of the plan or project for that site in view of that site's conservation objectives.

A person applying for any such consent, permission or other authorisation must provide such information as WBC may reasonably require for the purposes of the assessment or to enable it to determine whether an appropriate assessment is required.

WBC must for the purposes of the assessment consult Natural England (NE) and have regard to any representations made by that body. It must also, if it considers it appropriate, take the opinion of the general public, and if it does so, it must take such steps for that purpose as it considers appropriate. In the light of the conclusions of the assessment, and subject to Regulation 64 (Considerations of overriding public interest), WBC may agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the European site.

In considering whether a plan or project will adversely affect the integrity of the site, WBC must have regard to the manner in which it is proposed to be carried out or to any conditions or restrictions subject to which it proposes that the consent, permission or other authorisation should be given.

2. Stage 1 Screening for Likely Significant Effects

WBC accepts that this proposal is a 'plan or project' which is not directly connected with or necessary to the management of a European Site. The Thames Basin Heaths Special Protection Area (SPA) is a European designated site which affects the borough, and WBC must ensure that development does not result in an adverse impact on the SPA. The potential adverse effects on the integrity of the SPA include recreational activities from inside the SPA and air pollution from inside and outside the SPA.

At this stage WBC cannot rule out 'likely significance effects' on the SPA (alone or in combination with other plans or projects) because the proposal could undermine the Conservation Objectives of these sites. This is because the proposal lies within **5 km** of the SPA and:

- represents a net increase in dwellings within 400m - 5km of the Thames Basin Heaths Special Protection Area (SPA) which will lead to an increase in local population and a potential increase in recreational activity on the SPA

As the 'likely significance effects' cannot be ruled out at this stage an Appropriate Assessment must be undertaken.

3. Stage 2 Appropriate Assessment

Based on the information proposed by the applicant, WBC must decide whether or not an adverse effect on site integrity (alone or in combination with other plans or projects) can be ruled out. Mitigation may be able to be provided so that the proposal is altered to avoid or reduce impacts.

The following policies and guidance set out WBC's approach to relevant avoidance and mitigation measures which have been agreed with Natural England. For the majority of housing developments this will comprise the provision of (or contribution towards) Suitable

Alternative Natural Greenspace (SANG) and a contribution towards the Strategic Access Management and Monitoring (SAMM) Project. Developers will be required to secure an appropriate financial contribution for the provision of SANG and to the SAMM project through an obligation in a s106 agreement.

For SDL development (and occasionally some other larger non SDL developments) within 5km of the SPA, SANG is required at a minimum of 8 ha per 1,000 new residents, constructed and delivered to Natural England's quality and quantity standards and a contribution towards pan SPA access management and monitoring (as advised by the Thames Basin Heaths Joint Strategic Partnership Board). For SDL development (and occasionally some other larger non SDL developments) between 5 and 7km, the proposals will need to be individually assessed but it is likely that SANG will be required on site in line with Natural England's quality and quantity standards, although the exact requirement will be agreed having regard to evidence supplied.

a. Policies and Guidance

For this proposal the following guidance and policies apply:

- South East Plan (May 2009) Policy NRM6 (Thames Basin Heaths Special Protection Area)
<http://webarchive.nationalarchives.gov.uk/20100528160926/http://www.gos.gov.uk/gose/planning/regionalPlanning/815640/>
- Wokingham Borough Core Strategy (2010) Policy CP8 (Thames Basin Heaths Special Protection Area) sets out the approach WBC will take in order to protect the TBH SPA <https://www.wokingham.gov.uk/sites/wokingham/files/2023-06/Final%20adopted%20Core%20Strategy%20inc.%20cover.pdf>
- Wokingham Borough Core Strategy (2010) Policy CP7 (Biodiversity) sets out the approach WBC will take in order to protect national and international nature conservation sites <https://www.wokingham.gov.uk/sites/wokingham/files/2023-06/Final%20adopted%20Core%20Strategy%20inc.%20cover.pdf>
- Wokingham Borough Managing Development Delivery Local Plan (2014) Policy TB23 (Biodiversity and Development)
<https://www.wokingham.gov.uk/sites/wokingham/files/2023-06/Adopted%20MDD.pdf>
- Infrastructure Delivery and Contributions SPD (2011)
<https://www.wokingham.gov.uk/sites/wokingham/files/2023-06/Adopted%20Infrastructure%20De~nd%20Contributions%20SPD.pdf>

The project as proposed would not adversely impact on the integrity of the SPA if avoidance and mitigation measures are provided as stipulated by these policies and guidance.

b. SPA Avoidance and Mitigation Measures

i) The provision of Suitable Alternative Natural Greenspace (SANG) and its ongoing maintenance in perpetuity.

In accordance with the development plan, the proposed development will be required to provide alternative land to attract new residents away from the SPA. The term given to this alternative land is Suitable Alternative Natural Greenspace (SANG).

As this development is not part of an SDL, the developer may make a payment contribution towards strategic SANGs in line with schedule below (most likely this will be at Rooks Nest

Wood SANG although it is subject to SANGs capacity in the right location within Wokingham borough). An occupation restriction will be included in the Section 106 Agreement in order to ensure that the contribution has been made prior to occupation of the dwellings. This gives the certainty required to satisfy the Habitats Regulations in accordance with South East Plan Policy NRM6 (iii) and Core Strategy Policy CP8

The development will result in a net increase of **16 no dwellings**, broken down as follows: **2 x 1 bedroom dwellings, 6 x 2 bedroom dwellings and 8 x 3 bedroom dwellings**. Depending on the dwelling mix, the level of SANG payments are set out as follows:

No. of bedrooms	SANG Contribution 5km	Aggregate SANG Contribution
1 bedroom	£1,567.98	£3,135.96
2 bedrooms	£2,049.59	£12,297.54
3 bedrooms	£2,690.93	£21,527.44
4 bedrooms	£3,546.86	£0
5 bedrooms	£4,240.62	£0
Total SANG Contribution		£36,960.94

ii. Strategic Access Management and Monitoring (SAMM) Contribution

The proposed development will also be required to make a contribution towards Strategic Access Management and Monitoring (SAMM). This project funds strategic visitor access management measures on the SPA to mitigate the effects of new development on it.

From 1st April 2023 SAMM contributions have been updated across the 11 Local Authorities affected by the Thames Basin Heaths Special Protection Area. Following engagement with Natural England, the Joint Strategic Partnership Board agreed this change is necessary to ensure sufficient income is raised to cover the costs of the SAMM project in perpetuity. Without this change the SAMM project would be at risk of being unable to deliver the objectives of the SAMM project, and therefore secure positive outcomes for the SPA

The level of contributions are calculated on a per bedroom basis. The application for this development is for **2 x 1 bedroom dwellings, 6 x 2 bedroom dwellings and 8 x 3 bedroom dwellings**. Depending on the dwelling mix, the level of SAMM payments are calculated as follows:

No. of bedrooms	SAMM Contribution 5km	Aggregate SAMM Contribution
1 bedroom	£582.00	£1,164
2 bedrooms	£810.00	£4,860
3 bedrooms	£1,077.00	£8,616
4 bedrooms	£1,267.00	£0
5+ bedrooms	£1,447.00	£0

Total SAMM Contribution	£14,640
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Prior to the permission being granted the applicant must enter into a Section 106 Agreement based upon the above measures.

4. Conclusion

An Appropriate Assessment has been carried out for this development in accordance with the Habitats Regulations 2017. Without any appropriate avoidance and mitigation measures the Appropriate Assessment concludes that the development is likely to have a significant effect upon the integrity of the SPA with the result that WBC would be required to refuse a planning application.

Provided that the applicant is prepared to make a financial contribution (see above) towards the costs of SPA avoidance and mitigation measures, the application will be in accordance with the SPA mitigation requirements as set out in the relevant policies above.

WBC is convinced, following consultation with Natural England, that the above measures will prevent an adverse effect on the integrity of the SPA. Pursuant to Article 6(3) of the Habitats Directive (Council Directive 92/43/EEC) and Regulation 63(5) of the Conservation of Habitats and Species Regulations (2017) as amended, and permission may be granted.

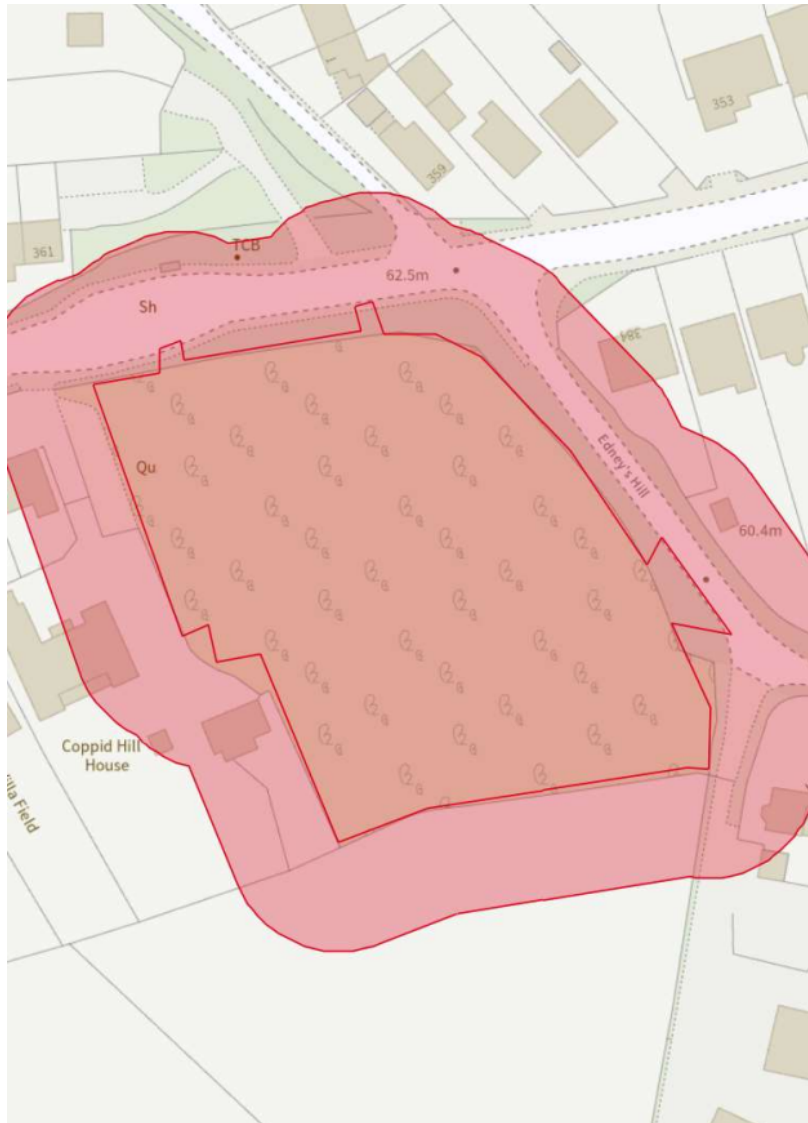
If the applicant does not agree with the above mitigation and does not enter into a Section 106 Agreement to secure the measures, then the application must be refused using the following reason for refusal.

5. Example Reason for Refusal

In the absence of a planning obligation to secure suitable avoidance and mitigation measures and access management monitoring arrangements, in terms that are satisfactory to the Local Planning Authority (LPA), the LPA is unable to satisfy itself that the proposals include adequate mitigation measures to prevent the proposed development from having an adverse effect on the integrity of the Thames Basin Heaths SPA, in line with the requirements of Regulation 63 of the Conservation of Habitats and Species Regulations 2017 as amended and Article 6(3) of Directive 92/43/EEC. The proposal would be contrary to Policy NRM6 of the South East Plan, Policies CP8 and CP4 of the Core Strategy.

Date:	16/10/25	Signed:	
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PLANNING CONSTRAINTS/STATUS: Land west of Edney's Hill, Barkham Road, Barkham.



Affordable Housing Thresholds | Total count: 4

#	NAME
1	Outside Development Locations
2	Within Modest or Limited Development Locations
3	Within Modest or Limited Development Locations
4	Within All Development Locations

Scale and Location of Development Proposals | Total count: 1

#	FEATURE_TYPE	NAME
1	Countryside	Countryside

Thames Basin Heath SPA Mitigation Zones | Total count: 1

#	FEATURE_TYPE	FEATURE_NAME
1	Special Protection Area Linear Mitigation Zone	5km Linear Mitigation Zone

Green Infrastructure Routes Consultation Zone | Total count: 1

#	FEATURE_TYPE
1	Green Route

Public Rights of Way within Wokingham Borough Consultation Zone | Total count: 1

#	FEATURE_TYPE	CONSULT	STATUS
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1	Public Rights of Way in Wokingham Borough	Public Rights of Way Officer, Green Infrastructure Team	Byway open to all traffic
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Rights of Way Improvement Plan Consultation Zone | Total count: 1

#	Proposal_Type
1	New Footpath or Bridleway

Major Nuclear Sites Consultation Zone | Total count: 1

#	FEATURE_TYPE	FEATURE_NAME	PLANNING_NOTE
1	Consultation Zone - Major Nuclear Site	AWE: 12km Zone	This is the 12km Zone. A circular zone of 12km radius around all nuclear sites, for certain types of significant development due to the potential for such developments to pose an external hazard to sites.

Aerodrome Safeguarding: Heathrow Consultation Zone | Total count: 1

#	Height Band	Wind Turbine	Aviation
1	All works exceeding 150 metres (492.1 feet)	YES	YES

Submitted Sites Live | Total count: 1

#	SITE_REF	LUPP	ADDRESS
1	5BA017	Housing (C3 Planning Use Class). Self Build.	Land adjacent to Coppid Hill House, Barkham Road

Wokingham Borough Council Owned Land | Total count: 1

#	Address	Tenure	Title_no
1	land on the south side of Barkham Hill, Barkham	Absolute Freehold Estate in Land	BK60517

Risk of Flooding from Surface Water | Total count: 4

#	FEATURE_TYPE	FEATURE_NAME
1	Environment Agency Surface Water Flood Zones	1 in 1000 year risk extent
2	Environment Agency Surface Water Flood Zones	1 in 1000 year risk extent
3	Environment Agency Surface Water Flood Zones	1 in 1000 year risk extent
4	Environment Agency Surface Water Flood Zones	1 in 1000 year risk extent

Bat Roost Habitat Suitability | Total count: 6

#	FEATURE_TYPE	FEATURE_NAME	CONSULT
1	Bat survey required for planning applications that involve roof modification or demolition.	TA941	Ecology Officer, Green Infrastructure Team
2	Bat survey required for planning applications that involve roof modification or demolition.	TA942	Ecology Officer, Green Infrastructure Team
3	Bat survey required for planning applications that involve roof modification or demolition.	TB940	Ecology Officer, Green Infrastructure Team
4	Bat survey required for planning applications that involve roof modification or demolition.	TB943	Ecology Officer, Green Infrastructure Team
5	Bat survey required for planning applications that involve roof modification or demolition.	TF941	Ecology Officer, Green Infrastructure Team

6	Bat survey required for planning applications that involve roof modification or demolition.	TG944	Ecology Officer, Green Infrastructure Team
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Great Crested Newt Impact Risk Zones | Total count: 2

#	FEATURE_TYPE	FEATURE_NAME	CONSULT
1	Great Crested Newt Impact Risk Zone	Green	Consult NatureSpace for Major developments only
2	Great Crested Newt Impact Risk Zone	Amber	For Householder applications check HH Layer. Consult NatureSpace for all other types of development

Great Crested Newt Impact Risk Zones - Minor | Total count: 1

#	FEATURE_TYPE	FEATURE_NAME	CONSULT
1	Great Crested Newt Impact Risk Zone	Amber	Consult NatureSpace for any minor development that intersects a red or amber zone in this layer

SSSI Impact Risk Zones | Total count: 1

#	IRZURL
1	https://irz.geodata.org.uk/IRZ/step2.html?irzcode=0101000322302-es=11401&location=479935,165401%20(IRZ%20polygon%20centre)

Potentially Contaminated Land Zones | Total count: 1

#	FEATURE_TYPE	OBJECTID
1	Potentially Contaminated Land Consultation Zone	1

Landscape Character Assessment 2019 | Total count: 1

#	FEATURE_TYPE	Name
1	Landscape Character Assessment 2019	Arborfield Cross and Barkham Settled and Farmed Clay

Wards | Total count: 1

#	NAME	Closest Approximate Distance
1	Barkham & Arborfield Ward	0 m

Parishes | Total count: 1

#	NAME	Closest Approximate Distance
1	Barkham CP	0 m