DELEGATED OFFICER REPORT

WOKINGHAM BOROUGH COUNCIL

Application Number:	260746
Site Address:	Plot B, Lot 4, Eversley Road, Arborfield,
Expiry Date:	24 July 2026
Site Visit Date:	24 March 2026
Proposal: Full application for the change of use of land to a gypsy and traveller site to allow the stationing of two residential caravans for occupation, with associated access and residential use.	

PLANNING POLICY	
National Policy	National Planning Policy Framework (NPPF)
Core Strategy (CS)	CP1 – Sustainable Development CP2 – Inclusive Communities CP3 – General Principles for Development CP4 – Infrastructure Requirements 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 TB09 – Residential Accommodation for Vulnerable Groups TB10 – Traveller Sites TB21 – Landscape Character TB22 – Sites of Urban Landscape Value TB23 – Biodiversity and Development TB24 – Designated Heritage Assets TB25 – Archaeology
Joint	DM1 - Sustainable Development

Public: Information that can be seen and used by everyone inside and outside the Council.

Minerals and Waste Plan (JMWP)	DM2 - Climate Change – Mitigation and Adaptation DM3 - Protection of Habitats and Species DM4 - Protection of Designated Landscape DM5 - Protection of the Countryside DM6 - Green Belt DM7 - Conserving the Historic Environment DM8 - Restoration of Minerals and Waste Developments DM9 - Protecting Health, Safety and Amenity DM10 - Flood Risk DM11 - Water Resources DM12 - Sustainable Transport Movements DM13 - High Quality Design of Minerals and Waste Development DM14 - Ancillary development DM15 - Site History
Wokingham Borough Local Plan Update (LPU)	SS1 – Sustainable development principles SS2 – Spatial strategy and settlement hierarchy SS5 – Development in the countryside SS10 – Meeting our housing needs SS15 – Securing infrastructure SS16 – Safeguarded routes SS17 – Transport improvements CE1 – Design principles for efficient buildings CE3 – Environmental standards for residential development CE7 – Low carbon and renewable energy generation CE8 – Protecting renewable energy generation 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 C6 – Technology and innovation in transport C8 – Utilities H1 – Housing mix, density and standards H3 – Affordable housing H4 – Exception sites H7 –Specialist accommodation H9 – Gypsies and Travellers and Travelling Showpeople provision H10 – Traveller sites H13 – Retention of mobile home parks FD1 – Development and flood risk (from all sources) FD2 – Sustainable drainage FD3 – River corridors and watercourses 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 NE6 – Valued landscapes DH1 – Place making and quality design DH2 – Safeguarding amenity

Public: Information that can be seen and used by everyone inside and outside the Council.

	HC3 – Local Green Space 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
Other	National Planning Practice Guidance Borough Design Guide Supplementary Planning Document Affordable Housing Supplementary Planning Document Arborfield and Barkham Neighbourhood Plan

PLANNING HISTORY – This history covers the site and adjoining land		
Application No.	Description	Decision & Date
F/1995/63126	Change Of Use Of Land To Caravan Site For 16 Units	Refused 19 February 1996
T/1996/64702	Application For Temporary Permission For Siting Of Caravan	Refused 17 January 1997
F/2009/2110	Application for formation of vehicle access with entrance gate. Retrospective.	Approved 03 December 2009
202766	Application for submission of details to comply with the following condition of planning consent 172209 dated 23/01/2018. Condition 6 Environmental and traffic management improvements.	Approved 26 October 2020
190116	Application for a non-material amendment to planning consent 172209 dated 23/01/2018 (as varied by 181802 dated 03/09/2018) re: the construction of a 2.3km Arborfield Cross Relief Road. The proposed minor material amendment seeks to amend the design of the Green Bridge (where the road alignment bisects Footpath ARBO 17) and comprises changes to foundations, appearance of the arch and other details.	Approved 07 February 2019
181919	Application for the submission of details to comply with the following condition of planning consent 172209 (dated 23/01/2018)- 4. Construction Environmental Management Plan 11. Protection of Trees 14. Archaeology	Approved 18 April 2019
172209	Full application for the construction of a 2.3 KM Arborfield Cross Relief Road (including shared use pathway) linking A327 Reading Road in the	Approved 23 January 2018

Public: Information that can be seen and used by everyone inside and outside the Council.

	north and A327 Eversley Road in the south east. The proposal includes two new roundabout junctions link to the existing road network along the A327, a new staggered priority junction at Swallowfield Road and a new shared-use (non-motorised user) bridge where Arborfield Footpath 17 intersects the proposed relief road.	
260736	Full application for the proposed change of use of land for the stationing of 1 no. static caravan for occupation by Gypsies / Travellers with associated access.	Refused 08 July 2026
260737	Full application for the proposed change of use of land for the stationing of 1 no. static caravan for occupation by Gypsies / Travellers with associated access and landscaping works.	Refused 08 July 2026
260209	Full application for the change of use of land to a residential caravan site comprising the siting of seven static caravans for residential occupation, alongside ecological enhancements and associated ancillary works, utilising the existing vehicular access.	Withdrawn 15 June 2026
260735	Full application for the proposed change of use of land for the stationing of 1 no. static caravan for occupation by Gypsies /Travellers with associated access and landscaping works	Refused 08 July 2026
261394	Full application for the proposed change of use of agricultural land to a residential caravan site for Gypsies and Travellers consisting of 3no. pitches each comprising 1no. static caravan, 1no. touring caravan, 1no. single-storey day room, 1no. cycle and bin storage, boundary fencing and associated landscaping.	Pending consideration

CONSULTATION RESPONSES
Internal
WBC Environmental Health – No comments received **WBC Drainage** – No objection subject to conditions **WBC Enforcement** – Case open regarding breach of injunction **WBC Highways** – Insufficient information to determine application **WBC Growth & Delivery (Planning Policy)** – No comments on G&T need position **WBC Landscape and Trees** - Insufficient information to determine application **WBC CIL –** No comments received **WBC Ecology Newts** - Insufficient information to determine application **WBC Ecology** - Insufficient information to determine application **WBC Waste Services** – No response received. **WBC Cleaner and Greener** – No response received.
External

Public: Information that can be seen and used by everyone inside and outside the Council.

Office for Nuclear Regulation - No response received. **Natural England -** No response received. **Thames Water Utilities Ltd -** No response received. **South East Water -** No response received. **Berks, Bucks & Oxon Wildlife Trust -** No response received. **Berkshire Fire & Rescue Sevices –** General requirement to comply with Fire regulations

REPRESENTATIONS	
Parish/Town Council	Objection: • Conflict with Policy CP11 • Non compliance with CP3 due to highways safety, lack of drainage details, absence of emergency vehicle access, harm to character of the area • Lack of information on trees, hedgerows, landscape mitigation – Policy CC03 • Not exempt from BNG • Biodiversity impacts including GC. • Highways safety/access lacks detail for visibility splays, swept path etc – Policy CP6 • Unsafe for pedestrians on Eversley Road • No SPA mitigation • Lack of affordable housing
Ward Member(s)	No comments received
Neighbours	No comments received

APPRAISAL

Background information:

Revised drawings were submitted on 9 June 2026 to address the highways and drainage comments.

Site Description:

The site is located to the west of the A327 and a new access is proposed onto Eversley Road to the south of the site along with a 25m access road. The site is within the Countryside.

The site is covered by a permanent injunction dated 16 September 2011 which seeks to prevent development on the site without express grant of planning permission.

Proposal:

The proposal comprises the change of use of an open piece of agricultural land to a single gypsy pitch for 2no. static caravan. The site is approximately 1017sqm (plus concrete access road approximately 207m). A site layout has been provided that shows a two static caravans in the site. Ther is no key to show what the yellow area

Public: Information that can be seen and used by everyone inside and outside the Council.

indicates. The site is shaded red and labelled “920m2” hardstanding, however the area shaded is 962sqm. The site is surrounded by a native hedgerow with a 9m width access. To the rear of the site, the block plan is annotated “480m2” and there is a gap in the hedgerow for access to this land. It is unclear if this forms part of the pitch or not or what the use of this area is. Beyond this is an area annotated “scrub”. The block plan is below:

No information has been submitted as to the proposed occupiers and whether additional caravans may be required e.g. touring caravans.

It is also assumed that no amenity block or touring caravan spaces are proposed.

Background

The Highfield Park and Walkers Yard caravan site are located approximately 100m west of the site. These sites comprise approximately 32no. Gyspy/traveller pitches (many of which comprise more than 1 caravan). They have presented management problems for the Council in terms of compliance with planning permissions and licencing. The sites have often been either over or under occupied being the scene for antisocial behaviour and fly tipping. Some of the pitch owners have experienced conflict with others in the travelling community.

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.

The National Planning Policy Framework (“NPPF”) forms a material consideration with a presumption in favour of sustainable development.

The Planning Policy for Traveller Sites (PPTS) (2024) sets out guidance to ensure fair and equal treatment for gypsies and travellers and also requires due regard for the

Public: Information that can be seen and used by everyone inside and outside the Council.

protection of local amenity and the local environment. The PPTS states that new traveller site development in the open countryside away from existing settlements should be restricted and that sites in rural areas should respect the scale of, and not dominate, the nearest settled community as well as avoiding placing undue pressure on local infrastructure. The most recent update to the PPTS included an amended definition of Gypsies and Travellers contained within Annex 1 which now includes individuals with a cultural tradition of nomadism.

Policy CP2 of the Core Strategy supports proposals that address the requirements of 'the specific identified needs of minority groups in the borough, including Gypsies, Travellers and Travelling Show people'. The proposed development is for a Gypsy/Traveller pitch and therefore is supported by this policy.

Policy CP11 of the Core Strategy relates to proposals outside development limits designed to protect the separate identity of settlements and maintain the quality of the environment. The current application site is located outside of development limits and therefore is subject to this policy.

Policy TB10 of the MDD Local Plan relates to Traveller Sites and again, is another criteria based policy.

The application site is located within the parish of Barkham and therefore the Arborfield & Barkham Neighbourhood Plan (made in April 2020) forms part of the development plan for determining the application. The neighbourhood plan is consistent with the strategic policies in the Core Strategy and MDD and with the NPPF. The Independent Examiner's findings on the Neighbourhood Plan can be found in the Examination Report. The Plan contains no specific policies in relation to Gypsy and Traveller development. Policy IRS1: Preservation of separation of settlements supports Policy CP11.

Emerging Local Plan:

The Council is currently progressing their Local Plan Update ("LPU"). The Proposed Submission Plan was submitted to the Secretary of State for examination by an independent Planning Inspector on Friday 28 February 2025. Two independent Inspectors were appointed, with Part 1 examination hearings held in November 2025. The Inspectors confirmed that the examination can progress to Part 2 hearings, which are currently taking place (March – June 2026).

The LPU Proposed Submission Plan includes Policies H9 and H10 intended to meet the accommodation needs of Gypsies and Travellers. Actions include the allocation of specific sites, delivery within strategic allocations and approving applications where suitable. Policy H10 sets criteria to consider planning applications against, which includes support for sites in the countryside when well related to defined settlements, and also seeks to prevent the loss of pitches / sites to alternative uses. Site 5AR028 promoted into the LPU process covers an area of approximately 8ha which includes the application site. However, the site was promoted for bricks and mortar housing, and was assessed as unsuitable through the Housing and Economic Land Availability Assessment (see submission document HO7b). The site was not included as a proposed allocation within the Proposed Submission Plan.

Public: Information that can be seen and used by everyone inside and outside the Council.

Policy H9: Gypsies and Travellers and Travelling Showpeople provision

1. Provision will be made for a minimum 86 net additional pitches for Gypsies and Travellers* in the period 1 April 2023 to 31 March 2040.

2. The accommodation needs of Gypsies and Travellers, and Travelling Showpeople will be supported and met by:

   a) Protecting existing Gypsy and Traveller and Travelling Showpeople accommodation from redevelopment or change of use to other uses;
   b) Allocating the sites listed in Part 3) below for additional Gypsy and Traveller pitches;
   c) Requiring strategic scale development to include appropriate onsite provision of Gypsy and Traveller pitches as part of a mixed community; and
   d) Approving applications for additional provision which accord with Policy H10.

Site allocations and delivery as part of strategic scale development

3. The sites listed below, and defined on the Policies Map, are allocated for residential caravan site use to be occupied by Gypsy and Travellers and should be used only for this purpose:

Ref	Site name	Approx no. pitches
SS14.1	High Barn Farm, Commonfield Lane, Barkham	20
SS14.2	Honeysuckle Lodge, Commonfield Lane, Barkham	4
SS14.3	Woodlands Farm, Wood Lane, Barkham	15

163 | Page

Wokingham Borough Local Plan Update: Proposed Submission Plan 2023-2040

SS14.24	Woodside, Blagrove Lane, Wokingham	4

4. The sites listed below, and defined on the Policies Map, are allocated for sustainable, well designed mixed-use development, which includes the provision of Gypsy and Traveller pitches as per Policy SS12 and Policy SS13:

Ref	Site name	Approx no. pitches
SS11	Arborfield Green Strategic Development Location	5
SS12	South Wokingham Strategic Development Location	6
SS13	Loddon Valley Garden Village	20

5. All residential development proposals for 500 or more dwellings (gross) will provide 1 Gypsy and Traveller pitch per 200 dwellings, rounded up to the nearest whole figure, as part of inclusive mixed communities.

*In accordance with the definition at Annex 1 of the Planning Policy for Traveller Sites (2015) as updated 19 December 2023.

Policy H10: Traveller sites

1. Development proposals for new Gypsy and Traveller pitches and Travelling Showpeople plots will be supported where all of the criteria are met:

   a) The site is located in a defined settlement or if in countryside, is well related to a defined settlement within or adjoining the borough;
   b) The proposal is of a scale which does not dominate nearby settlements whether singly or cumulatively with any existing or permitted sites in the area;
   c) Safe and suitable access to the highway network for vehicles, caravans and pedestrians can be provided and there is adequate space for the parking and manoeuvring of caravans within the site;
   d) The scheme is sensitively and appropriately designed, including landscaping, to respect landscape character in accordance with Policies NE4, NE5 and NE6;
   e) The proposal should be adequately serviced, or be capable of being adequately serviced, preferably by mains connections; and
   f) The proposal provides acceptable standards of amenity for the site's occupants and does not have unacceptable impact on the amenity of neighbouring properties in accordance with Policy DH2.

In addition, Travelling Showpeople sites should demonstrate that the site has adequate space and is designed to allow for the manoeuvring, storage and maintenance of show equipment and associated vehicles.

165 | Page

Wokingham Borough Local Plan Update: Proposed Submission Plan 2023-2040

2. Proposals for sites of mixed residential and business use will only be considered appropriate if the business use accords with Policy ER4 and would not result in an unacceptable loss of amenity to the residential occupiers or surrounding properties in accordance with DH2.

Loss of pitches or plots

3. Development proposals that would result in the net loss of existing pitches /plots, land allocated for pitches / plots, or land with planning permission for pitches / plots will only be supported when one or more of the following criteria are met:

   a) The pitch, plot or site is no longer suitable for such use and that alternative provision on a site that is of equal or better quality is provided; or
   b) It is clearly demonstrated that there is no current or foreseeable future need for pitches or plots in the borough.

4. Development proposals for pitches specifically to accommodate transit movements will be permitted, subject to satisfying parts 1, 2, and 3 of this policy.

Weight to be attributed to the emerging policy is informed by paragraph 49 of the NPPF 2024. This advises that weight can be applied according to the plan's stage of preparation, the extent to which there are unresolved objections, and the degree of consistency with the NPPF. No substantive comments were received and therefore there are no substantive unresolved objections.

Notwithstanding this, Policy H10 can therefore be afforded moderate weight in the determination of planning applications at this point in time.

Policy H10 is a criteria based policy that is intended to supersede Policy TB10. While similar to policy TB10 in a number of ways, it introduces updated considerations and nuance. Of note, it recognises the reality that Gypsy and Traveller sites will not necessarily be within or adjacent to settlements, and instead seeks to require that they are 'well related' to a defined settlement as per part 1a). Supporting paragraph 9.99 explains that:

> "…*To be considered 'well related, sites generally will need to be within reasonable travelling distance by active travel modes to a nearby settlement, taking account of any barriers to movement."*

Also of note to the site is part 1c) of H10 which requires safe and suitable access to the highway network as well as 1d) relating to the landscape and 1e) relating to utility servicing.

Submitted Sites:

Public: Information that can be seen and used by everyone inside and outside the Council.

As stated above, the site and wider area was put forward in the 'call for sites' for residential development (site reference: 5AR028). Between November 2021 – January 2022, consultation was undertaken on the Local Plan Update: Revised Growth Strategy. The Housing and Economic Land Availability Assessment (HELAA) considered the site, but it was removed at Stage 2c for the following reasons:

The final suitability conclusion stated:

"The context of the site is considered unsuitable, being inappropriate in terms of established settlement form and pattern, landscape character and accessibility.

While it is noted that the site is partially PDL [Highfield Park itself], redevelopment would be visually prominent and would result in the loss of large number of G&T pitches which would exacerbate need elsewhere in the borough."

<u>Location of Development:</u>

Policy CP11 states that proposals outside of development limits will not normally be permitted except where specified exceptions apply. The provision of residential gypsy/traveller caravan pitches does not meet any of these specified exceptions.

Notwithstanding, Policy CP2 supports sites 'within or close to development limits of a settlement'. Policy TB10 of the MDD supports sites 'located in or adjacent to' an existing settlement. The site is not located adjacent to development limits, and is separated from the nearest settlements by two roads and a green buffer.

Policy CP11 refers to development within the countryside and states 'in order to protect the separate identity of settlements and maintain the quality of the environment, proposals outside of development limits will not normally be permitted', expect for the exceptions listed. The clear starting point is therefore that development outside of these limits should not normally be permitted.

The application site is outside of development limits and within the countryside and is therefore an inappropriate location in principle for new residential development including residential caravans for occupation by gypsy/travellers.
However, due regard should be had to specific purpose of policy CP11, which is to maintain the sense of separation between settlements and to maintain the quality of the environment. In this respect an assessment will be undertaken below to establish whether the proposal would conflict with this purpose, thereby establishing how much weight is to be given to any identified conflict.

Although the site is outside development limits and is not adjacent to a defined settlement, the proposal would not, by reason of its modest scale as a single pitch, result in settlement coalescence or materially undermine the separate identity of nearby settlements. The site is separated from the nearest settlement by Eversley Road, Observer Way and intervening green infrastructure, but it is not so remote as to be wholly isolated from the existing pattern of development associated with Arborfield SDL and Highfield Park. Accordingly, whilst there is conflict with the locational requirements of Policies CP11 and TB10, the degree of conflict arising

Public: Information that can be seen and used by everyone inside and outside the Council.

specifically from settlement separation is limited.

However, this does not overcome the wider policy conflict or render the location acceptable in principle. The proposal would still introduce a residential caravan pitch and associated access infrastructure into open countryside, outside development limits, in a manner that gives rise to landscape, character, access, drainage, ecological and design concerns considered later in this report. As such, the limited harm in respect of settlement coalescence reduces the weight attributable to that aspect of the CP11 conflict, but it does not remove the overall conflict with the development plan. That conflict is therefore carried forward into the planning balance, where it is considered alongside the identified benefits and harms before reaching the conclusion that the adverse impacts significantly and demonstrably outweigh the limited benefits of the proposal.

GRT need and supply:

The PPTS was updated in December 2024 in line with the NPPF.

Policy C of the PPTS states that when assessing the suitability of sites in rural or semi-rural settings, local planning authorities should ensure that the scale of such sites does not dominate the nearest settled community.

Policy H of the PPTS is titled 'Determining planning applications for traveller sites'. Paragraph 25 states that local planning authorities should consider the following issues amongst other relevant matters when considering planning applications for traveller sites:

a) the existing level of local provision and need for sites

b) the availability (or lack) of alternative accommodation for the applicants

c) other personal circumstances of the applicant

d) that the locally specific criteria used to guide the allocation of sites in plans or which form the policy where there is no identified need for pitches/plots should be used to assess applications that may come forward on unallocated sites

e) that they should determine applications for sites from any travellers and not just those with local connections

The PPTS was updated in December 2024. The requirement to maintain a deliverable supply of pitches to meet 5 years' worth of sites remains, however the update amends the consequences of a lack of 5-year supply which now engages the presumption in favour of sustainable development contained in the NPPF, commonly referred to as the tilted balance. However, as referenced above, the PPTS 2024 at paragraph 28 states:

"If a local planning authority cannot demonstrate an up-to-date 5 year supply of

Public: Information that can be seen and used by everyone inside and outside the Council.

deliverable sites, the provisions in paragraph 11(d) of the National Planning Policy Framework apply."

The NPPF 2024 at paragraph 11d) states for decision taking:

"where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date[8], granting permission unless:

i. the application of policies in this Framework that protect areas or assets of particular importance[7] provides a strong reason for refusing the development proposed; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework 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[9]."

Footnote 7 states that the policies referred to in the NPPF include, amongst other matters, areas at risk of flooding. The site is within an area of surface water flooding and it is not clear whether the development is capable of being located outside areas liable to flooding.

In the absence of a locally set requirement for pitches, the sufficiency of supply is considered against assessed need. The latest full assessment of the accommodation needs is the Gypsy and Traveller and Travelling Showperson Accommodation Assessment (2023) (GTAA 2023). The assessment identified a cultural need for 86 net additional pitches between 2022/23 and 2039/40. 53 of the 86 pitches represented the need of nomadic households. In reaching this conclusion, the assessment took into account all sites with permission for additional pitches.

Table 1: GTAA 2023: Pitch requirement 2022/23 to 2039/40

Period (years)	**Cultural need (pitches)**	**Nomadic need (households meeting the now superseded definition of Gypsy and Traveller) (pitches)**
5yr pitch need (2022/23 to 2026/27)	35	**35**
Longer-term need (2027/28 to 2039/40)	51	18.2

Public: Information that can be seen and used by everyone inside and outside the Council.

Total pitch need (2022/23 to 2039/40)	86	53

The consequence of the change in definition of Gypsies and Travellers introduced by the PPTS 2024, is that the deliverable supply is now calculated against the cultural need, and not the nomadic need as was previously the case.

Whilst the council has a strong track record of permitting new pitches, the new baseline position including extant pitch permissions at the time the GTAA 2023 was prepared, coupled with the change in definition, means that the council is currently unable to demonstrate a sufficient deliverable supply of pitches. At 31 March 2025 the deliverable land supply of pitches equates to **3.64 years** against the cultural need identified in the GTAA 2023. Further detail of the sources which comprise this position can be found in the supply statement for Land east of Warren Lodge, Warren Lane, Finchampstead, RG40 4HR.

Assessment:

Whilst the Council are currently unable to demonstrate a five-year deliverable supply of permanent GRT pitches, based on the allocations proposed in the emerging LPU, it is anticipated that there will be a demonstrable 5 year supply on adoption. Further information is available in the Gypsy and Traveller accommodation topic paper September 2024 ("GTATP"). However, development proposals which contribute to this five-year supply are weighed positively in the planning balance.

In terms of policy application, Policy TB10 of the MDD Local Plan relates to Traveller Sites. The proposals involve an increase in caravan units on the existing site. The development is assessed against the nine criteria of TB10 below:

a) The site is located in the Borough's existing settlements or is adjacent to an existing settlement either within or adjacent to the Borough.

Whilst outside of settlement limits, the site is not far from Arborfield Garrison strategic development location (approximately 100m away from the boundary). It cannot be considered adjacent in the literal sense (due to its separation by roads and green infrastructure from the SDL itself) but is close to the boundary and thus is nearby but not isolated from the settlement.

b) Avoids impacting on the separate identity of settlements

Given its modest scale of a single pitch comprising a single static caravan the proposal would not create any settlement coalescence and therefore complies with criterion b.

c) The site has access to a range of local services such as shops; health facilities including doctors, schools, and a range of amenities including play areas and other recreation facilities

Public: Information that can be seen and used by everyone inside and outside the Council.

The site is moderately sustainable with connections to the new infrastructure created by the Arborfield Garrison strategic development location. Criterion (c) is therefore met to a limited degree.

d) No significant barriers to development exist in terms of flooding, poor drainage, poor ground stability or proximity to other hazardous land or installations where conventional housing would not be suitable

The site is located within Flood Zone 1 but part of the site is at risk of surface water flooding, this is discussed further below.

e) Unacceptable impacts on the character and appearance of the surrounding landscape will be minimised through the sensitive and appropriate design of the scheme

This will be outlined in the Character of the Area and Landscape sections. There is conflict with criterion (e).

f) The proposals will not result in an unacceptable loss of amenity of neighbouring land uses

The proposed development would not result in an unacceptable loss of amenity of neighbouring land uses.

g) Mixed use proposals (which are sites that include a business use) will only be considered if appropriate to the locality and such uses will not result in an unacceptable loss of amenity

The proposal is not for a mixed use.

h) The scheme avoids any adverse impacts on the Special Protection Area

Suitable mitigation may be secured via S106 legal agreement and the principle is agreed within the Planning Statement and the Agent confirmed their agreement in an email on 27 May 2026.

Of particular note are criterion a), d) and e). Criteria a) requires a site to be within or adjacent to a defined settlement.

Criterion d) requires no significant barriers to development, with reference made to flooding and proximity to other hazardous land or installations, the latter being relevant due to the surface water flood risk present at the site.

Criterion e) requires no harm to landscape character. The application does not meet criterion a) but is near to the settlement. With the site being subject to flood risk, a judgement would be required on whether this presents a significant barrier to understand compliance with criterion d) This is set out in the flood risk section below.

Further considerations relate to criterion e). This is also considered in more detail under the “character and appearance section of this report” however, concludes that

Public: Information that can be seen and used by everyone inside and outside the Council.

the impacts on the landscape are unacceptable.

Criterion (h) is also considered below. At this stage there is conflict due to a lack of S106 agreement or any means of alternative mitigation. Although the principle of signing a S106 agreement has been confirmed by the Agent; this has not been pursued due to prevent unnecessary expense to the applicant given the other issues raised in this report.

Consequently, the proposal conflicts with Policy TB10 and is unacceptable in principle.

Alternative Sites:

It is recognised that there is no requirement in planning policy, or case law, for an applicant to prove need for development. However, should an applicant wish to justify departure from policy on the basis of need, it is reasonable for the availability of alternative sites to be considered when judging the weight that should be attached.

No alternative sites have been put forward by the Applicant.

Evidence of a search for alternative accommodation is expected. It is noted that no information has been provided about potential future occupiers, including any personal needs circumstances that might exist.

The council has approved a number of pitches in recent years. Those which have yet to be implemented could potentially be available to the applicants. Pitches with permission which have yet to be implemented are as follow:

- Land at Dun Elms, Nelsons Lane (241486 & 243193) – 8 pitches (5 additional)

This consists of an additional 8 pitches to an existing 2 pitch site granted permission across two separate applications. Those permissions are understood to have been sought on the basis of the additional pitches being for further family members of the existing occupiers. On that basis, it is likely that those pitches would not be available to any prospective

Permission for 1 pitch (F/2004/2522) exists at 23a Nine Mile Ride. This site has been established for many years, but has been completely cleared since at least summer 2022, as recently verified by a visit during the January 2026 caravan count. Consequently, there is potential that this pitch is available.

Additionally, permissions at Belvedere Park (173022, 192174) are understood to have been implemented, but there is a reasonable possibility pitches may also be available on this site given the non-personal nature of the permissions and likely turnover on this private site.

As stated above, the LPU Proposed Submission Plan seeks to allocate land for Gypsy and Traveller pitches as follows:

- High Barn Farm, Commonfield Lane, Barkham – 20 pitches

Public: Information that can be seen and used by everyone inside and outside the Council.

- Honeysuckle Lodge, Commonfield Lane, Barkham – 4 pitches
- Woodlands Farm, Wood Lane, Barkham – 15 pitches
- Woodside, Blagrove Lane, Wokingham – 4 pitches
- Arborfield Green Strategic Development Location – 5 pitches
- South Wokingham Strategic Development Location – 6 pitches
- Loddon Valley Garden Village – 20 pitches

Many of the above sites would be of a scale that could in theory accommodate the number of pitches subject to this application. The council's latest land supply position considered High Barn Farm and Woodside to be demonstrably deliverable.

Other recently approved sites comprise:

- Plot 1 Highfield Park ref: 253024 - 4 pitches
- Plot 10 Highfield Park ref: 223669. This site was recently vacant although the fencing had been implemented.
- Land Opposite 130-144 Wargrave - 260373 – 1 pitch (removal of personal condition).
- 201143 – 166 Nine Mile Ride - The Promise – 4 Pitches

In summary, there are potential alternative sites that may be available to future occupiers of the development for which advice is being sought. It is expected that these, and other reasonable alternatives, are considered.

The applications have been submitted for the following sites but have not yet been determined by the Council. These may/may not become deliverable in the near future.

- *[260314 – Woodside Park Blagrove Lane - 7no. additional pitches currently under consideration by the Council]*
- *[261171 - Charlton Lane Swallowfield – 5no. pitches currently under consideration by the Council]*
- *[260577 – Range Road – 2no. pitches currently under consideration by the Council]*
- *[260439 – Range Road 1no. pitch currently under consideration by the Council]*
- *[261394 - Adj to Highfield Park 3no. pitches currently under consideration by the Council]*

Personal Circumstances:

The applicant has not put forward personal circumstances therefore no weight is applied to this. The Planning Statement advises *"The proposal is for two permanent pitches for Irish Travellers".* There is no evidence of the applicants personal circumstances or family requirements. There is no evidence that the applicant or intended occupiers meet the definition of gypsy/travellers.

However, a condition can secure the occupation in perpetuity to meet the Council's need.

Public: Information that can be seen and used by everyone inside and outside the Council.

No formalised outdoor amenity provision has been provided as a part of the application, nor a designated play area. This conflicts with the Borough Design Guide. Given the size of the plot there is sufficient space surrounding the caravan to engage in outdoor activities such as drying clothes and modest recreation, however some landscaping/green space would be appropriate to be secured by condition.

Design & layout:

The Wokingham Borough Design Guide SPD seeks to ensure development is of a high standard of design that can integrate with the character of the area is also important to achieving sustainable development in the Borough.

Policy TB10 of the MDD and R24 of the Borough Design Guide SPD states that the layout and design of gypsy sites should provide a safe living environment that meets the needs of residents, while respecting the character of the local area. The supporting text to R24 indicates that the layout of individual pitches must include:

- a clear demarcation of boundaries that is sympathetic to the character of the surrounding area;
- a clear gap of 3m inside site perimeter boundaries for fire prevention;
- a degree of privacy for individual households whilst maintaining a sense of community;
- the ability to manoeuvre living accommodation to the site and onto each pitch, based on trailers of up to 15m in length;
- safe access and egress to site;
- easy access and a safe turning places for emergency and refuse vehicles; • natural surveillance to allow residents to oversee all areas of the site; • clear delineation of public communal areas and private space, with boundaries to each pitch;
- a communal play area for children and potentially a building to house communal facilities;
- a 6m separation distance between each caravan, trailer and park home, for fire safety reasons; and
- infrastructure such as water and electricity supply, surface water and storm drainage, lighting and waste disposal arrangements.

For the layout of individual pitches/plots:

- adequate space for car parking on each pitch;
- pitch boundary ability to position caravan away from overhanging trees for fire safety reasons;
- a hard standing area suitable for use by trailers, touring caravans or other vehicles; and
- an amenity building to provide as a minimum water and electricity supply, toilet, personal washing and laundry facilities.

Similarly, CP2 of the Core strategy requires the proposed site to not be disproportionate to the scale of the existing settlement whether singly or cumulatively with any existing sites in the area.

Based on a review of general local authority guidance, an average pitch size of between 300–500 sqm is typically recommended. This usually provides sufficient

Public: Information that can be seen and used by everyone inside and outside the Council.

space for an amenity block (kitchen, bathroom, and living accommodation), up to two caravans (including touring caravans), and parking for up to two vehicles. The proposed site is 1017sqm.

However, there is no statutory requirement for pitch size, and accommodation needs can vary depending on the size and composition of the family unit. Where possible, a range of pitch sizes should be provided to allow flexibility and meet differing household requirements. No household requirements have been specified in this application to justify the large plot. The proposed caravans are static caravans with no touring caravan] proposed. Notwithstanding this, the large plot size is disproportionate when compared to the modest plots at Highfield Park and out of keeping with the pattern of development on this site.

The proposed layout of the pitch comprises two diagonally opposite static caravan with surrounded by hardstanding and a concrete. It is also not clear what the land to the rear of the pitch is to be used for – it is within the red line therefore forms part of the application site. The site is surrounded by “indicative” hedgerow and tree planting with no access gate/fencing. A boundary treatment/native hedgerow are proposed. Further details on boundary treatments would need to be secured by condition to ensure the Policy H(d) is met.

d) not enclosing a site with so much hard landscaping, high walls or fences, that the impression may be given that the site and its occupants are deliberately isolated from the rest of the community

It is noted that the caravan does not have a clear gap of 3m from any boundary treatment for fire prevention which is a requirement of any future site licence.

A larger plot at Highfield Park is approximately 1449sqm (Plot 10 approved under permission 223669) for 5 pitches (comprising 1 x static caravan and 1 x tourer caravan and 2 x parking spaces each). Plot 1 Highfield Park is approximately 796sqm and comprises 4 static caravans. The size of Plot 10 is comparable to the proposed site (1100qm). Whilst there is no prescribed minimum or maximum pitch size, the scale of the plot and associated infrastructure appears disproportionate to the accommodation proposed, which comprises a single static caravan with no touring caravan, amenity building or identified operational need for additional space. The layout therefore results in a low-density and inefficient use of land.

The site area is comparable to, and in some cases exceeds, plots which have been approved elsewhere for multiple caravans and associated facilities. In contrast, the current proposal seeks permission for only a single static caravan. No evidence has been submitted to explain why a plot of this size is required for the proposed occupiers or why the development cannot be accommodated within a more proportionate site area.

There is no justification for the size of the nor is there any indicating that a touring caravan or amenity block are proposed. Justification in the form of personal circumstances, details of the households proposing to use the site or other reasons for a disproportionately large plot have not be put forward.

Public: Information that can be seen and used by everyone inside and outside the Council.

In addition to the plot itself, at the entrance to the plot there is a 207m concrete road (5.9m wide).This road goes into an open field with no turning facility/area. Whilst it is acknowledged that turning provision is required for emergency and refuse vehicles, the scale, siting and configuration of this feature is not necessary and poorly integrated into the overall layout.

The design of the plot has a detrimental impact on the character and appearance of the area, it is disproportionately large and inconsistent with the pattern of pitches at Highfield Park and Walkers Yard thus causing encroachment into the countryside and associated harm of domestic paraphernalia spread across a large residential caravan site. This is contrary to CP3 as the proposed development is not of an appropriate, scale or layout and has a detrimental impact on the landscape. It fails to contribute to the sense of place.

The density of the site detached from Highfield Park itself is inappropriate and contrary to CP3 and CP5.

Affordable Housing:

Core Strategy Policy CP5 includes percentages, thresholds and indicative tenure mix for new affordable housing. It requires all residential proposals of at least five dwellings (net) or covering a site area of at least 0.16 ha to provide up to 50% of the net additional units proposed as affordable dwellings, where viable. The Council's Affordable Housing Supplementary Planning Document (SPD) July 2013 provides further guidance on its approach to securing affordable housing through the planning process. It sets out, subject to viability, the minimum percentages of affordable housing sought on site by land type and location. It also explains that, for the avoidance of doubt, any application for dwellings exceeding the thresholds in Policy CP5, including mobile home sites, will need to deliver affordable housing in line with the Core Strategy.

The site is considered a greenfield site, outside a development location. The site area and number of units (2no.) is under the threshold for affordable housing set out in CP5.

No affordable housing is therefore required.

Loss of agricultural land:

Policy CP1(7) of the Core Strategy and Paragraph 174(b) of the NPPF all state that that best and most versatile (BMV) agricultural land should be protected. The primary reasoning is to protect food production in the UK.

Agricultural land is graded between 1 and 5. The principal physical factors influencing grading are climate, site and soil.

Grade 1 land is excellent quality agricultural land with very minor or no limitations to agricultural use. Grade 5 is very poor-quality land, with severe limitations which restrict use to permanent pasture or rough grazing.

Public: Information that can be seen and used by everyone inside and outside the Council.

In line with the Council's 2019 Landscape Character Assessment, the site's agricultural quality is moderate as subgrade 3b. In line with the applicant's planning statement *"this quality of land is capable of producing moderate yields of a narrow range of crops, principally cereals and grass or lower yields of a wider range of crops or high yields of grass which can be grazed or harvested over most of the year"*,

Grade 3b agricultural land is not classed as BMV agricultural land that should be protected in line with CP1 and paragraph 174 of the NPPF and as such is afforded limited weight on balance considering its means of domestic food production.

Notwithstanding the site's food production capabilities, there is no policy basis to protect agricultural land with a lesser grade that subgrade 3a and therefore there is no objection in this regard.

Minerals & Waste:

The Central and Eastern Berkshire Joint Minerals and Waste Plan (hereafter 'Joint Plan') identifies site allocations and extensions to provide a future supply of sand and gravel extraction. However, despite these allocations, there remains a shortfall of supply during the plan period. The policy response to address the shortfall is the identification of a 'Minerals Safeguarding area' (MSA), where Policy M2 of the plan applies, and also an 'Area of Search' where policy M4 applies. This approach is to demonstrate the potential for, in effect, windfall provision within the Plan area.

The site is not located within both an MSA and 'Area of Search'.

Locational Sustainability:

Policies CP1, CP4, CP6, CP9 and CP11 of the CS permit development where it is based on sustainable credentials in terms of access to local facilities and services and the promotion of sustainable transport. Expanding on this, paragraph 4.57 in the CS aims to prevent the proliferation of development in areas away from existing development limits as they are not generally well located for facilities and services and would lead to the increase in use of the private car.

In this case, the site's exclusion from the emerging Local Plan Update is a significant material consideration. Through the HELAA process, the site was assessed and discounted on the basis that its context is unsuitable, being poorly related to the established settlement pattern, harmful to landscape character, and inadequately accessible. The proposal now before the Council is materially different to that promoted and assessed through the HELAA process, both in terms of the form of development and its intended use, and therefore does not benefit from any positive conclusions that may otherwise have been drawn from that exercise. Instead, the HELAA findings represent the Council's most up-to-date evidence-based assessment of the site's inherent constraints and sustainability credentials, which weigh against the proposal.

Furthermore, the scheme would necessitate the provision of a 207m access road which is not engineered to adoptable standards. It is proposed to be a 6m wide concrete track and does not include footways and lighting, in order to make the

Public: Information that can be seen and used by everyone inside and outside the Council.

development reasonably accessible. The extent of this infrastructure, for a relatively small-scale caravan site, would introduce urbanising features into the countryside, resulting in additional harm that must be balanced against any limited sustainability benefits.

No mitigation or obligations have been proposed to enhance local infrastructure or public transport provision, which would ordinarily be expected to support development in less sustainable locations. Whilst footways are shown on the submitted plans, they are fragmented and do not connect to any existing pedestrian network, crossing facility or destination. As a result, they serve no meaningful transport function and do not provide safe or convenient pedestrian access to local services and facilities. The proposed footways therefore appear as isolated and ineffective features which fail to address the site's reliance on private motor vehicles or overcome the sustainability concerns identified by the Highway Authority.

Whilst the site benefits from some proximity to the SDL, this does not overcome the fundamental concerns identified through the HELAA process or the clear policy direction to resist ad hoc development in the countryside. The proposal is therefore considered to represent an unsustainable form of development contrary to policies CP1, CP4, CP6, CP9 and CP11 of the Core Strategy.

Open Space:

MDD Local Plan policy TB08 requires new development to provide public open space and greenspace to reflect the quantum of development. The background to TB08 is adopted from increases in net residential population, hence its importance to mitigate overcrowding of existing facilities.

National design guidance stipulates that public open space is a crucial factor in a landscape led scheme and design. Policy TB08 bolsters the fact that public open space is required for designated recreation and other purposes, i.e. for useable space as well as for visual amenity value.

The proposal includes no open space. On this occasion, a contribution should be sought for outdoor sports, allotments, play areas, civic space, cemeteries and the residual shortfall of the figures above.

The Green Infrastructure Team have provided the following comment on the required contribution in line with TB08:

Given the size of the site, public open space may be provided off-site via a contribution, to create new or improve existing green infrastructure serving the development.

For 2 new dwelling, the following amounts of green infrastructure/contributions would be required to be compliant with policy TB08, which will need to be secured via a section 106 agreement:

Public: Information that can be seen and used by everyone inside and outside the Council.

OFF-SITE PROVISION (contribution) as per policy TB08 - based on 2 new dwellings			
POS Typology	**Standard (ha per 1,000 population)**	**Application Requirement (in ha)**	**Contribution**
Civic space	0.01	0.000048	£ 56.64
Outdoor sports facilities	1.66	0.007968	£ 7,182.00
Allotments	0.52	0.002496	£ 1,372.80
Parks and public gardens	1.1	0.00528	£ 6,230.40
Cemeteries (in plots)	14.4	0.06912	£ 223.72
Play areas	0.25	0.0012	£ 2,805.60
Amenity greenspace	0.98	0.004704	£ 3,537.41
Natural/semi natural green space	2.84	0.013632	£ 10,251.26
Total			£ 31,659.83

The Agent was asked to confirm whether the Applicant was willing to sign up to a S106 agreement to this effect and confirmation was received that this was acceptable to the applicant. However, due to the principle issues with the proposal, the legal agreement has not been pursued to prevent unnecessary cost to the applicant. This does not preclude the applicant is pursuing a S106 legal agreement with the Council separately in the future.

Character of the Area:

The site comprises 1017sqm alongside the sitting of a static caravans and a highly engineered access road of approximately 207m in length. Limited landscaping is shown on the plan and boundary treatments are proposed.

The site lies within an area of open countryside, characterised by scrub grassland with sporadic tree cover. It is surrounded on three sides by open scrub grassland, with the fourth side bounded by the landscaped corridor and drainage features associated with Observer Way, beyond which lies the highway itself. The site sits at a lower level than Observer Way and is separated from it only by a low post-and-wire fence, resulting in a clear visual relationship between the application site, the road, and surrounding public viewpoints, including pavements and public rights of way.

Although parts of the site could be described as degraded in appearance, this does not justify or diminish the impact of introducing a permanent residential gypsy and traveller caravan site. The proposed development would materially alter the character of the land from open countryside to a more urban, residential form, through the introduction of hardstanding, a static caravan and associated paraphernalia. In the absence of any landscape framework, transitional planting or visual screening, the development would appear visually prominent and incongruous within its rural setting.

The proposal is separated from Highfield Park and does not form a logical or visually coherent extension of that site. Instead, it reads as an isolated residential incursion into the countryside, notwithstanding the presence of Observer Way. Visually, the

Public: Information that can be seen and used by everyone inside and outside the Council.

land is perceived as part of the wider countryside and as part of the landscaped setting to Observer Way, rather than as land associated with existing settlement (south of Eversley Road) which is clearly delineated by Eversley Road. The site is not isolated in the open Countryside due to the presence of Observer Way but clearly reads as open land detached from any other residential development and Countryside associated with the landscaping of Observer Way.

The context of the wider site can be seen below. The application site is in the approximately marked below.

In addition to the pitch itself, a heavily engineered road is proposed. Significant vegetation removal would be required to form the visibility splays. These works would erode the verdant and semi-rural character of the Green Route Enhancement Area and fail to protect and enhance existing green infrastructure networks. The proposal would therefore harm the character, function and visual amenity of the Green Route and is contrary to Policy CC03 of the Managing Development Delivery DPD, which seeks to protect and enhance green infrastructure, retain important landscape features and avoid the fragmentation or degradation of green corridors.

Notwithstanding the limited information provided in relation to the proposed access, the Highway Authority's comments (discussed in detail below) indicate that, in order for the access to be suitable for the proposed development, it would need to operate as a two-way access and be capable of accommodating vehicles towing touring caravans, the manoeuvring and delivery of static caravans, and access by refuse collection and emergency service vehicles. The access would also require the provision of substantial visibility splays, necessitating the removal of vegetation along

Public: Information that can be seen and used by everyone inside and outside the Council.

Eversley Road, together with an engineered solution to cross the inland river/ditch. These works would erode the verdant and semi-rural character of the Green Route Enhancement Area and fail to protect and enhance existing green infrastructure networks. The proposal would therefore harm the character, function and visual amenity of the Green Route and is contrary to Policy CC03 of the Managing Development Delivery DPD, which seeks to protect and enhance green infrastructure, retain important landscape features and avoid the fragmentation or degradation of green corridors.

Due to the length, width and engineered nature of the access road required to meet these standards, the resultant highway works would represent a significant and intrusive intervention into the countryside. The construction of such an access would further urbanise the site and its surroundings, resulting in additional harm to the character and appearance of the countryside beyond that arising from the change of use to the gypsy/traveller residential caravan site.

Some indicative hedgerow planting is proposed around the site to soften or assimilate the development into the surrounding landscape. However, this is likely to would draw attention to the site rather than integrate it due to the open nature of the land and its distinct lack of boundaries, resulting in an unacceptable and harmful impact on the character and appearance of the countryside. Even if mitigation or screening were to be introduced, this would not overcome the fundamental objection to the principle of a permanent residential caravan pitch in this location, as landscaping cannot render an otherwise inappropriate and isolated form of development in the countryside acceptable. The proposal is therefore contrary to CC03 and CP3 (a), (b), (c), (d), (f), (g).

Neighbouring Amenity:

Policy CC06 and Appendix 1 of the MDD Local Plan requires that development protect noise sensitive receptors from noise impact.

There will be no detrimental impact on neighbouring occupiers in terms of loss of privacy, loss of light or an overbearing impact due to the distance from other residential properties.

Highway Access and Parking Provision:

The NPPF paragraph 116 states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.
Core Strategy policy CP6 concerns issues relating to highway safety and access, stating that planning permission will be granted for schemes that, amongst other requirements, provide appropriate vehicular parking, enhance road safety and do not cause highway problems. Policy C2 of the emerging Local Plan Update, which is deemed to hold limited weight at this stage, states that with regards to highway safety and design, all development proposals must ensure safe and suitable access to the site for all users. This is in line with NPPF paragraph 115.

Public: Information that can be seen and used by everyone inside and outside the Council.

Policy CC07 and Appendix 2 of the MDD Local Plan set out the parking standards for development, noting that these should be regarded as a starting point with each site assessed on its own merits. P3 of the Borough Design Guide SPD notes that parking spaces are to be a minimum of 5m x 2.5m. P3 of the Borough Design Guide SPD notes that parking spaces should be safe and convenient, close to the dwelling and sited to minimise impact upon safety.

The proposals are for the change of use of land to a residential caravan site comprising of 1 plot with two static caravan dwellings. The applicant states that the proposed plot will use the *"existing track (with planning permission)."* However, given the existing conditions and the absence of approved council record, unless the applicant can justify that it is an existing lawful access for vehicles, it is to be considered as a new access, which is discussed further below. It has therefore been referred to throughout this response as the '*proposed'* access.

It is noted that other applications have been submitted to WBC (Ref: 260209, 260735, 260736, 260737) which utilise the same proposed access. Due to these other applications, the proposed access is considered to be a shared access for all plots.

The applicant has not provided a significant amount of information regarding parking, cycle storage, refuse strategy, access arrangements, internal access road design etc.

WBC Highways have provided a response on the information given, to enable the applicant to provide further information if they wish to proceed. However, it should be noted that at present WBC Highways are likely to object to the application on the basis of insufficient information regarding the proposed new access, highway safety and lack of pedestrian infrastructure and connectivity to local amenities.

The applicant should provide a revised Block Diagram that includes a key, and a Block Diagram and Location Plan that show consistent red line boundaries.

The traffic generated from two pitches of caravans are unlikely to have significant impacts on the wider highway network. Should further development come forward at this location, the combined traffic generation will need to be considered.

Access

The proposals would require a new access onto the A327 Eversley Road. This response considers this to be a proposed shared internal access road.

The access would either require a new access junction with bellmouth, or a new dropped kerb to be installed, subject to the proposed access arrangement and the total numbers of plots to be served by the proposed access.

As the proposed access is situated near a street lighting column, a telegraph pole and what appears to be a utilities box, the WBC Streetworks / Highway Assets teams may need to be consulted by the applicant.

The Planning Statement provided also refers to a *"second established access to the south."* The block plans do not indicate a secondary access. The applicant should

Public: Information that can be seen and used by everyone inside and outside the Council.

provide detail on the secondary access to be considered in the proposal.

Proposed Access Road

The proposed internal access road should be designed in line with WBC Living Streets: Highways Design Guide (2019) and should be designed to adoptable standards even if it is to remain as a private road. Whenever, applicable, the junction with the A327 should also be designed to adoptable standard.

For residential development with less than 10 plots, the shared access road will need to be upgraded to a minimum width of 4.1m to accommodate two-way traffic. A 4.5m wide shared access will be required to accommodate up to 25 residential plots.

Further information is required to demonstrate the use of the proposed internal access road in the event of vehicles accessing and egressing simultaneously. This should include passing places as appropriate.

Visibility Splays

Eversley Road is subject to a speed restriction of 50mph. Visibility splays of 2.4m x 160m should be provided in line with DMRB for a 50mph road. If a speed survey is conducted at the proposed access point, the 85th percentile speed may be used, provided the applicant provides full results of the speed survey.

The proposed plans do not highlight the street lighting column, telephone pole or road sign located on the A327 just to the north-east of the proposed access. To add, the vegetation to be removed on the plan appears much less than the vegetation present along the northwestern edge of Eversley Road. The applicant is to demonstrate that visibility splays to be provided in accordance with Figure 3.1 of DMRB CD 109, with no obstruction to the required sightlines between a driver's eye height of 1.05 m and an object height of 0.26 m over the full stopping sight distance. Within the visibility splay, the sightlines shall be across land within the applicant's control or highway land and shall be clear of obstructions to visibility between 0.6m and 2.0m in height.

A Stage 1 Road Safety Audit report is required for a new access onto an A-road which is to be submitted by the applicant. It should be noted that this also requires the speed survey results to be reported.

Dependent on the Average Annual Daily Traffic (AADT), to be obtained via an Automatic Traffic Count (ATC), further highway works may be required such as implementing a ghost island, in line with DMRB CD123.

Swept Path Analysis

A proposed site layout plan has been provided; however, the furthest point of the site exceeds the 40m threshold from the public highway for emergency access. In turn, the applicant is expected to demonstrate the manoeuvring of a fire tender vehicle entering and leaving the site access in the forward gear with the below dimensions:

Public: Information that can be seen and used by everyone inside and outside the Council.

DB32 Fire Appliance	
Overall Length	8.680m
Overall Width	2.180m
Overall Body Height	3.452m
Min Body Ground Clearance	0.337m
Max Track Width	2.121m
Lock to Lock Time	6.00s
Kerb to Kerb Turning Radius	7.910m

Swept path analysis of the site access is to be shown on a plan for cars, fire tender, refuse vehicles (noted below in 'Refuse Collection Strategy') to and from both directions of the A327. It should be noted that under no circumstances shall vehicles reverse from the site access into the A327, and all manoeuvring is to be shown to occur within the red line.

The applicant is to confirm the largest vehicle, which is anticipated to access the site, and provide additional swept path analysis of this vehicle if it is different to the refuse vehicle, as noted below. The applicant is required to show that the largest vehicle and a large saloon car can pass each other at the site access

<u>Pedestrian Access</u>
The proposals have not proposed any improvement along the A327 or surrounding area which would provide pedestrian access into the site at the proposed access, or along the proposed access road to access the caravan plot.

The lack of pedestrian access strategy is to be considered by the applicant as WBC Highways would likely object to the proposals on this basis.

As mentioned below in '**Sustainability'**, if the applicant does not propose suitable pedestrian connection, then WBC Highways would likely object to this application on the grounds of both sustainability and the proposed access arrangements.

Sustainability

The applicant is to provide information referencing distances to local amenities and facilities, in accordance with the preferred maximum distance set out in IHT's Guidelines for Providing Journeys on Foot.

There are no pedestrian or cycle connections between the site and surrounding infrastructure, including no crossing point near the proposed access to provide continuous connection with the pedestrian and cycle network along Eversley Road and Baird Road. Should the applicant wish to continue with the proposals, WBC Highways would expect the applicant to suggest suitable improvements to enhance the site sustainability and accessibility.

The implementation of a footway and crossing in the location of the proposed access will have to consider potential impacts on services, land ownership, drainage and utilities to determine its viability.

Public: Information that can be seen and used by everyone inside and outside the Council.

Given the site will be access via the A327 Eversley Road, a Stage 1 RSA will be expected for any proposed alteration that will impact on road user behaviours, or change the outcome of a collision.

Due to the above, Highways would object to the proposals on the grounds of sustainability unless the applicant can suggest any suitable contributions and/or improvements.

Parking

Parking is to be provided in line with WBC Parking Standards, and each parking space is to have the minimum dimensions of 2.5m x 5.0m. In general, proposed each dwelling in a 'village' location will require two to three parking spaces. The applicant is required to provide a plan showing the proposed site layout which includes parking spaces with the correct dimensions per caravan.

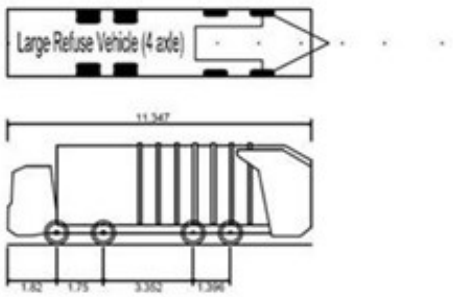
The parking spaces for each pitch are required to be accessed independently.

Cycle Provision

Cycle storage is to be provided in line with WBC Parking Standards. In general, one cycle parking allocation will be required per caravan for 3 or less habitable rooms, two for 4-5 habitable rooms and three for 6+ habitable rooms. The proposed cycle storage is to be indicated on a plan.

Refuse Collection Strategy

In line with MfS, the maximum carrying distances for households is 30m, and refuse collection operators is 25m from a refuse collection point. Given the length of the access road and the distance of the site from the public highway, a refuse vehicle will have to enter the site to undertaken refuse collection and perform a three-point turn without entering the plot extents. In turn, swept path analysis is required to demonstrate the manoeuvring of a refuse vehicle entering and leaving the site access in the forward gear with the below dimensions:



Large Refuse Vehicle (4 axle)	
Overall Length	11.347m
Overall Width	2.500m
Overall Body Height	3.751m
Min Body Ground Clearance	0.304m
Track Width	2.500m
Lock to Lock Time	6.00s
Wall to Wall Turning Radius	11.330m

Public: Information that can be seen and used by everyone inside and outside the Council.

Consultation with WBC's Cleaner & Greener team regarding refuse collection is recommended as this is a shared access.

If the applicant does not intend to use the council's refuse collection service, details of the private refuse and servicing strategy should be provided.

Summary

WBC Highways have provided comments on this application noting that other applications of similar nature have also been submitted using the same proposed access (Ref: 260209, 260735, 260736, 260737). As such, this response notes the proposed access is a shared access.

Unless the applicant can justify its lawfulness, WBC Highways consider this to be a new access. Additional information is required regarding access arrangement, visibility and a Road Safety Audit Stage 1 for the new proposed access. The applicant is also advised to consult TM, and the WBC Streetworks / Highway Assets teams accordingly.

Swept path analysis is required for several vehicles to ensure that the site has been designed appropriately.

The above information is required; however, it should be noted that WBC Highways would likely object to this application given the lack of pedestrian connectivity and access to the site unless the applicant can suggest any suitable contributions and/ or improvements.

The Highways officer has confirmed that the additional information submitted did not address their comments.

The application fails to demonstrate that appropriate visibility splays can be achieved, that the access road can safely accommodate the anticipated vehicle movements, that vehicles can safely manoeuvre within the site and enter and leave in a forward gear, or that adequate provision has been made for pedestrians, cyclists, emergency vehicles and refuse collection.

Furthermore, insufficient information has been submitted to demonstrate that the development would be accessible by sustainable modes of transport or would not give rise to unacceptable highway safety impacts. In the absence of the necessary supporting evidence, including a Stage 1 Road Safety Audit, speed survey data, swept path analysis and a fully justified access design, the Local Planning Authority cannot be satisfied that the development would provide a safe and suitable access or would not have an unacceptable impact on highway safety. The proposal is therefore contrary to paragraphs 115 and 116 of the NPPF, Core Strategy Policy CP6 and MDD Local Plan Policy CC07.

Flooding and Drainage:

The site is subject to flood risk, for which policies CP1 of the Core Strategy and CC09 and CC10 of the MDD are the most relevant.

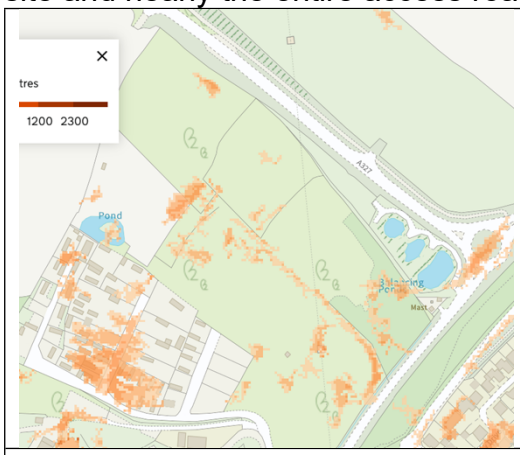
Public: Information that can be seen and used by everyone inside and outside the Council.

Policy CC09 requires 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. It states that development must be guided to areas of lowest flood risk by applying the sequential approach taking into account flooding from all sources and shall ensure flood risk is not worsened for the application site and elsewhere, and ideally that betterment of existing conditions is achieved.

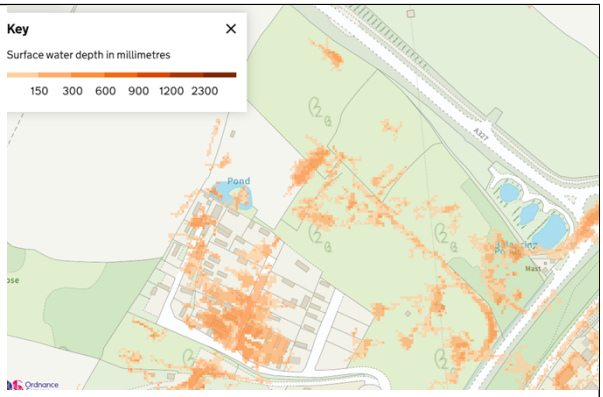
Policy CP1 of the Core Strategy states that planning permission will be granted for development proposals that avoid increasing (and where possible reduce) risks of or from all forms of flooding (including from groundwater).

This Environment Agency Flood Map for Planning shows the site is located within Flood Zones 1. However, the application site is located within an area identified as being at risk of surface water flooding.

The below plan indicates the areas of flood risk which comprises some of the caravan site and nearly the entire access road:



EA Flood Map Present Day



EA Flood Map 2061 - 2125

The site is subject to surface water flood risk, as outlined above. With regards to flood risk, residential caravans as proposed represent a highly vulnerable use. Whilst there is no specific guidance on how surface water flood risk should be considered in relation to the vulnerability of a proposed use, the NPPF 2024 nevertheless requires a sequential risk-based approach to be taken to individual applications known to be at risk from any form of flooding (paragraph 173). The NPPF 2024 is clear that development should not be permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding (paragraph 174).

Paragraph 175 sets out specific guidance in relation to the sequential test:

> *"The sequential test should be used in areas known to be at risk now or in the future from any form of flooding, except in situations where a site-specific flood risk assessment demonstrates that no built development within the site boundary, including access or escape routes, land raising or other potentially*

Public: Information that can be seen and used by everyone inside and outside the Council.

vulnerable elements, would be located on an area that would be at risk of flooding from any source, now and in the future (having regard to potential changes in flood risk).

The Planning Practice Guidance (Flood Risk and Coastal Change, updated September 2025) confirms that the Sequential Test should be applied proportionately and is not automatically required solely because a site is affected by surface water flood risk. It is therefore necessary to consider, in the first instance, whether application of the Sequential Test represents a proportionate response having regard to the scale and vulnerability of development proposed and the nature and extent of flood risk.

Paragraph 176 sets out further circumstances where the sequential test and exception test may not be required. This is not relevant to the proposal given they would involve a change of use to a caravan site which footnote 62 makes clear is not exempt from the tests.

The proposed development comprises at least a residential static caravan, which represent a highly vulnerable use. Mapping indicates that the site is affected by surface water flood risk. The updated PPG allows a proportionate approach where it can be demonstrated through supporting evidence that development can be safely accommodated within areas of lowest risk on the site and that residual risks can be appropriately managed.

Whilst a Flood Risk Assessment has been submitted, it is not considered to meet the requirements of the Planning Practice Guidance and does not provide sufficient site-specific information to demonstrate that the development would be safe for its lifetime, would not increase flood risk elsewhere, and would appropriately manage surface water flood risk. In particular, the assessment lacks adequate evidence regarding flood levels, climate change impacts, safe access and egress, and the feasibility of the proposed drainage measures. Consequently, the Local Planning Authority is unable to conclude that the development would be safe from a flood risk perspective, nor that sufficient information has been provided to assess the appropriateness and proportionality of the Sequential Test.

Given the highly vulnerable nature of the proposed use and the identified surface water flood risk, national policy requires the precautionary application of the sequential approach. Accordingly, the application should be supported either by sufficient evidence demonstrating that application of the Sequential Test is not proportionate, or by a Sequential Test identifying whether reasonably available sites at lower risk of flooding exist.

The proposals would therefore require the application of the sequential test. The PPG on 'Flood risk and coastal change' defines a 'reasonably available site' as:

> "*those in a suitable location for the type of development with a reasonable prospect that the site is available to be developed at the point in time envisaged for the development.*" (Paragraph: 028 Reference ID: 7-028-20220825)

WBC would expect an assessment of 'reasonably available sites' to include the

Public: Information that can be seen and used by everyone inside and outside the Council.

following sources:

- Sites in adopted or draft local plans that have already been allocated for development and could be suitable for the development proposed;
- Sites that haven't been allocated in the local plan, but that have been granted planning permission for a development that's the same or similar to the development you're proposing;
- Windfall sites that aren't allocated in the local plan and don't have planning permission, but that could be available for development.

In addition to allocated sites and sites with permission, a number of sites have been submitted as part of the Local Plan Update, the locations of which are all publicly available. It would be reasonable to expect that all sites within the borough concluded to be deliverable, developable or potentially developable for the same or similar type of development are considered through the sequential test, with a conclusion drawn as to whether each is reasonably available now for the proposed use.

There is no requirement in the NPPF or PPG to apply the exception test to development at risk of surface water flooding only, with this instead being driven by fluvial flood risk. Notwithstanding, paragraph 181 of the NPPF requires that residual risk is safely managed and that development is appropriately flood resistant and resilient.

The Council's Drainage Engineer has advised that, while elements of the site fall within an area identified as being susceptible to surface water flooding, this constraint is limited in spatial extent and does not affect the entirety of the site. As such, there remains sufficient developable area outside of the higher risk zones, and the level of risk identified is not considered so significant as to preclude development in principle. Instead, the matter can be appropriately managed through the imposition of suitably worded planning conditions requiring the submission and approval of a detailed surface water drainage scheme including the requirement for infiltration tests.

Such a scheme would need to demonstrate that the development would not increase flood risk on-site or elsewhere, incorporating appropriate sustainable drainage measures (SuDS) in accordance with the drainage hierarchy. This would typically include measures to attenuate runoff, control discharge rates to greenfield equivalents, and ensure safe exceedance flows are managed on site. Given that surface water flood risk can often be addressed through design and engineering solutions at the detailed stage, the Drainage Engineer is satisfied that the issue can be adequately mitigated through condition, ensuring that a policy-compliant drainage strategy is secured prior to the commencement of development.

Notwithstanding the absence of an objection from the Council's Drainage Engineer, who has recommended the imposition of planning conditions, this response does not override the requirement to demonstrate compliance with national and local planning policy in respect of flood risk.

In the absence of sufficient supporting evidence, including a site-specific Flood Risk Assessment and, where necessary, a Sequential Test, the Local Planning Authority cannot be satisfied that the development would be located appropriately having

Public: Information that can be seen and used by everyone inside and outside the Council.

regard to flood risk, or that it would be safe for its lifetime without increasing flood risk elsewhere. As such, the lack of objection from the drainage consultee does not negate the need for these fundamental policy requirements to be met.

The drainage consultee's position is primarily concerned with the technical feasibility of surface water management and mitigation, whereas the planning assessment must consider the broader policy tests set out in the NPPF, PPG and the development plan, including the application and proportionality of the sequential approach and the suitability of the site for a highly vulnerable use.

Notwithstanding this, the submission also fails to address how the inland watercourse that is crossed by the proposed access and internal road would be accommodated, managed or protected. The absence of details relating to culverting, bridging, hydraulic capacity, maintenance and long-term management further prevents an adequate assessment of flood risk, drainage and watercourse impacts.

The connection to an ordinary watercourse requires Ordinary Watercourse Consent separately to the planning permission. It is noted that Culverting is not normally supported unless there is clear justification, and any proposal would need to demonstrate no adverse hydraulic impact, no increased flood risk on or off site, and suitable long-term maintenance arrangements.

In its current state, the application lacks sufficient detail to assess the impact on the water environment. At a minimum, the applicant should be required to provide:

- Details of the existing and proposed watercourse alignment, including levels
- A method statement for removal of the obstruction and reinstatement of flows
- Full design details of any proposed culvert (including diameter, length, headwall details, and materials)
- Hydraulic calculations demonstrating no increase in flood risk
- Evidence of how exceedance flows will be managed along with maintenance plan for the watercourse and any associated structures.

Foul Drainage:

The site is not located within reasonable proximity to a public foul sewer and will therefore requires an alternative means of foul drainage. The application does not provide sufficient detail to demonstrate how foul water will be appropriately and safely disposed of in accordance with the drainage hierarchy. No information has been submitted to confirm whether connection to the public sewer is feasible, or, if not, whether a suitable private foul drainage solution such as a package treatment plant or septic system can be satisfactorily accommodated within the site without adverse impacts on human health, ground conditions, groundwater or nearby watercourses. In the absence of detailed foul drainage proposals, including layout, capacity, discharge arrangements and maintenance responsibilities, the Local Planning Authority is unable to fully assess the acceptability of the development in drainage terms.

Thames Water have not provided any comments on the application.

Flood Risk Summary:

Public: Information that can be seen and used by everyone inside and outside the Council.

The presumption in favour of sustainable development set out in paragraph 11 of the NPPF (the “tilted balance”) remains engaged in this instance. Whilst footnote 7 identifies flood risk as a matter capable of providing a strong reason for refusal, the site lies within Flood Zone 1 and the identified constraint relates to surface water flooding rather than fluvial flood risk of a severity that would automatically disengage the presumption. Furthermore, the Council’s Drainage Engineer has raised no objection in principle, subject to the imposition of suitably worded planning conditions.

However, the application is not supported by a site-specific Flood Risk Assessment, a Sequential Test, or sufficient technical evidence to demonstrate that the development would be safe for its lifetime, would not increase flood risk elsewhere, and would appropriately manage surface water. In the absence of this information, the proposal fails to demonstrate compliance with Policies CP1, CC09 and CC10, and the requirements of the NPPF and PPG.

As such, flood risk concerns attract significant adverse weight in the planning balance. Whilst these matters do not, in isolation, disengage the tilted balance or amount to a standalone reason for refusal, they materially weigh against the proposal.

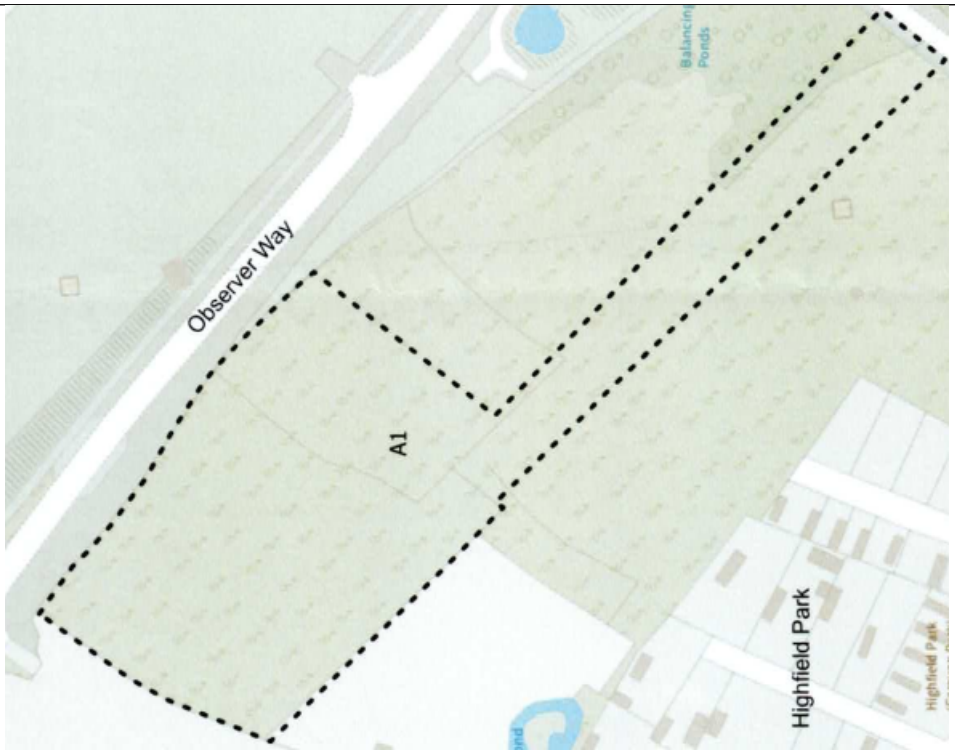
Even if the presumption in favour of sustainable development were considered disengaged the identified harms would still exist and are assessed in the planning balance.

Landscape and Trees:

Trees:

During the determination of the application (25 Jun 2026), Tree Preservation Order 2015/2026 was made in respect of on site trees (all species). In the case of this application, the trees predominately relate to the trees along the proposed access road. Whilst the Order has not yet been confirmed, it took effect provisionally on the date it was made and therefore provides statutory protection to the trees pending confirmation. The making of the Order is a material consideration and demonstrates the Council's view that the trees make a significant contribution to public amenity. The proposal has therefore been assessed having regard to the provisional TPO and the likely impact of the development on the protected trees. The TPO plan is below:

Public: Information that can be seen and used by everyone inside and outside the Council.



A number of trees were observed on the site during the site visit. No arboriculturally impact assessment was submitted with the application. While these trees may not contribute significantly to the character of the area when considered on their own, their removal as a collective would inevitably have some form of negative impact in terms of a degree of harm to local landscape character and visual amenity, even if additional planting is proposed.

An Arboricultural Statement has been provided which states there are no trees located within the site boundary or falling distance of the site, however following site visit it was noted that there are a number of trees and other vegetation that will be affected by the proposals which include a new access. Therefore, a tree survey and arboricultural impact assessment to BS 5837:2012 will need to be provided to identify the tree resource within and adjacent to the site and to help inform design and layout of the site in relation to RPA's of trees in accordance with MDD Local Plan Policy CC03. Any tree or vegetation removal will also have a detrimental impact on the wider landscape character.

Insufficient details have been provided regarding the necessary work to enable construction of the concrete access road which is wider than the existing track and will require further tree and vegetation clearance of the surrounding young woodland. There is also a need to culvert the roadside watercourse which is currently blocked by recent earthworks. Vegetation clearance in relation to the access road and associated visibility splays will have a detrimental impact on the adjacent Green Route

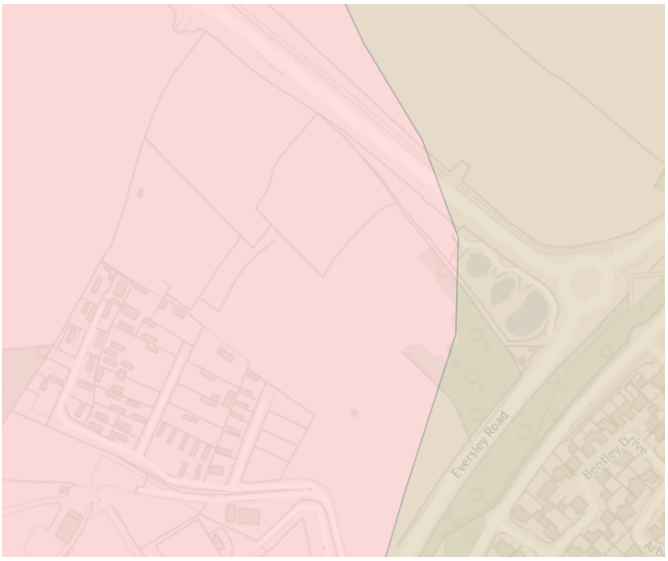
In the absence of this information, it cannot be established whether any TPO trees or any other trees would be harmed by the proposal, nor whether appropriate mitigation or retention measures could be secured. However no trees are shown on the site plan which indicates that all trees are being removed from the site.

Public: Information that can be seen and used by everyone inside and outside the Council.

In the absence of this information, the potential impacts of the development on existing trees cannot be adequately assessed. The proposal is therefore considered contrary to Policies CC03 and CP3, as insufficient information has been provided to demonstrate that the development would avoid harm to trees which make a positive contribution to the character and appearance of the area, or that suitable mitigation could be achieved.

Landscape Character:

The landscape in which the site is located is very much rural in character especially to the south and west of the site where the relatively flat landscape stretches across towards the River Loddon in the west. The Wokingham Borough Landscape Character Assessment (WBLCA) dated November 2019 indicates that the site mainly falls within LCA L2 – Farley Wooded Sand and Gravel Hills (pink in below plan) with a small part adjacent to Eversley Road within LCA J2 – Arborfield Cross and Barkham Settled and Farmed Clay (brown in below plan) which MDD Local Plan Policy TB21 affords weight in decision making.



The WBLCA identifies a number of different landscape character areas (LCA's) across the Borough and provides key information regarding each of the LCA's, cross referenced with the requirements of MDD Local Plan Policy TB21. The site falls within landscape character area J2 Arborfield Cross and Barkham Settled.

L2 – Farley Wooded Sand and Gravel Hills:

Valuable Landscape Attributes:

- *Distinctive hilly landform and wooded skyline visible and forming a backdrop in the wider landscape.*
- *Variety and complexity of mixed broadleaved woodland, some of which is ancient in origin, with high biodiversity value reflected in BAP priority habitats and LWS designations.*
- *Intimate pattern of pastures, woodland and arable farmland provides scenic*

Public: Information that can be seen and used by everyone inside and outside the Council.

quality and visual diversity.

- *Recreational value of the network of the tree-lined and enclosed byways and footpaths allowing access and enjoyment of the countryside in close proximity to urban areas.*
- *Rural pattern of farms and hamlets, which are well integrated into the wooded landscape and display a strong vernacular of timber-framed farmhouses and cottages, with polychromatic Reading brick, clay-tiled or thatched roofs.*
- *Sunken winding rural lanes and tracks with mature hedgerows are visually appealing and add rural character to the landscape.*
- *Historic parkland landscape associated with the Farley Hill estate, designated as a Registered Park and Garden, provides a cultural record of the past and layers of history within the landscape.*
- *Contrast between the enclosure created by the woods and framed views across the Loddon, Broadwater and Blackwater river valleys.*
- *Areas with a strong sense of seclusion and rural tranquility, with naturalistic perceptual qualities and experience of dark skies due to the lack of settlement.*

Landscape Condition:

This is a distinctive hilly landscape with an intact pattern of pastures, woodland and arable farming interspersed with vernacular settlements. These provide a strong sense of place and strong perceptual qualities of seclusion and remoteness resulting in a good condition. However increasing traffic levels are affecting the tranquillity of the area. The presence of large agricultural buildings and semi-industrial uses for farms is incongruous, as is the replacement of hedgerows with fencing.

Landscape Strategy:

To maintain the landscape character of the Farley Hill Wooded Sand and Gravel Hills the following strategy is required: to conserve and enhance the existing wooded and secluded character.

The key aspects to be conserved are the views, intimate pattern of pastures, tranquillity and dark skies, woodland and arable farmland and rural settlement pattern linked by narrow lanes. There are opportunities to restore and actively manage the historic parkland, ancient woodland coppice and the connecting hedgerows. Marginal farmland and paddocks should also be enhanced.

In terms of development, the aim is to conserve the sparse settlement pattern, and maintain the low density of development avoiding encroachment from the new development at Arborfield.

J2 Arborfield Cross and Barkham Settled and Farmed Clay:

Valuable Landscape Attributes:

- Barkham Brook and associated wetland which provide important ecological habitats including wet meadow and BAP priority habitat wet woodland.

- Pattern of arable and pastoral fields, which provides a rural character away

Public: Information that can be seen and used by everyone inside and outside the Council.

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.

- Historic Second World War pillboxes and other defence works, which are now a scenic part of 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.

Landscape Condition:

The landscape is in overall moderate condition, due to the pattern of arable and pastoral fields, and remnant wetland influences associated with Barkham Brook. However, the hedgerow network is fragmented and the introduction of further development through the Arborfield Garrison SDL and associated infrastructure will further fragment the rural settlement pattern altering the character of the area.

Landscape Strategy:

To maintain the landscape character of the Arborfield Cross and Barkham Settled and Farmed Clay the following strategy is required: to conserve and enhance the remaining rural character of the landscape in accordance with MDD Local Plan Policy TB21.

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 which retain the open and rural character of the landscape between settlements.

Valued Landscape

A number of Valued Landscapes within Wokingham Borough were initially identified through a Topic Paper on Valued Landscapes by WBC dated January 2020 to respond to paragraph 187 (a) of the NPPF and prepared as part of the evidence base for the Emerging Local Plan Update and associated Policy NE6. Further work has recently been undertaken to make refinements to the boundaries of the valued landscape areas to update the assessment, and this has now been published in the Valued Landscapes Assessment dated September 2024 as part of the evidence studies produced for the Local Plan Update: Proposed Submission Plan (Regulation 19).

Public: Information that can be seen and used by everyone inside and outside the Council.

Paragraphs 187(a) and (b) of the NPPF state that development should contribute to and enhance the natural and local environment by:
a) Protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
b) Recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.

The application site falls within Farley Hill Valued Landscape. The NPPF indicates that these landscapes will need to be protected and enhanced, so therefore we will need to understand how development on this site can address this aspect and this should also form part of the LVIA.

The edge of Arborfield Garrison in this area is well contained by a landscape buffer between Baird Road and Eversley Road containing open grass and wooded areas. This area forms a verdant landscape buffer with rural characteristics separating the edge of settlement from the A327. This strong landscape feature was recognised as having an important landscape function by the Planning Inspector considering an application for an apartment block within the landscape buffer where the appeal was dismissed as the proposals would cause likely significant harm to the character and appearance of the area (APP/X0360/W/21/3276169, planning app 202303).

The landscape buffer provides a well-defined edge to the settlement of Arborfield Garrison restricting the influence that the existing dwellings have on the wider landscape character beyond the settlement boundary. It is therefore not considered that despite the presence of the SDL, that there are the strong urbanising influences over the site itself from the existing settlement.

It is recognised that the Arborfield Relief Road creates some form of disturbance to the area, however this is no more than other A roads passing through the countryside. As stated, the new Arborfield Relief Road (Observer Way) was carefully designed to reduce the detrimental effects within the landscape with soft verges/ swales and no lighting apart from at either end of the road at the roundabouts. The road has also had extensive landscaping in order to address the effects of the road on the wider landscape character and to reinforce the existing landscape structure. In that respect Observer Way is not a substantial detractor to the wider landscape character area of J2 nor does it substantially add further urbanising influences on the site to justify inappropriate development.

The site is adjacent to a Green Route Enhancement Area and therefore it is essential that land adjacent to this designation is enhanced by protecting and managing existing trees and other vegetation, and ensuring a high-quality streetscape, including hard and soft landscaping that take into account the existing character and sensitivities of the landscape. Policy CC03 required development to demonstrate how they have considered certain criteria within their scheme in order to:

a) Provide new or protect and enhance the Borough's Green Infrastructure networks, including the need to mitigate potential impacts of new development

Public: Information that can be seen and used by everyone inside and outside the Council.

b) Promote accessibility, linkages and permeability between and within existing green corridors including public rights of way such as footpaths, cycleways and bridleways
c) Promote the integration of the scheme with any adjoining public open space or countryside
d) Protect and retain existing trees, hedges and other landscape features e) Incorporate high quality, ideally, native planting and landscaping as an integral part of the scheme

Furthermore, development proposals which would result in the loss, fragmentation or isolation of areas of green infrastructure will not be acceptable.

The proposed development fails to conserve of enhance the landscape character of the area and is therefore contrary to CP1, CP3 and TB21 as it fails to address the requirements of the Council's landscape character assessment and fails to enhance the character and features that contribute to this open pastoral landscape.

The proposed development would result in harm to the character, function and visual amenity of the designated Green Route. By reason of its siting, form and associated features, the development would undermine the rural and recreational qualities of the route and would detract from its open, pastoral setting. The proposal therefore fails to protect or enhance the Green Route in accordance with Policy CC02 of the Managing Development Delivery Local Plan.

Ecology:

Policy CP7 of the Core Strategy states sites designated as of importance for nature conservation at an international or national level will be conserved and enhanced and inappropriate development will be resisted.

Policy TB23 of the MDD Local Plan requires the incorporation of new biodiversity features, buffers between habitats and species of importance and integration with the wider green infrastructure network.

The applicant has submitted the following documents in support of this application:

- Great crested newt Statement, January 2026 by Stuart Carruthers
- Badger Survey Statement, January 2026 by Stuart Carruthers
- Habitats Plan, 15th December 2025 2025 by Uknown (using OS Maps)
- Block Diagram, 15th December 2025 by Uknown (using OS Maps)
- Location Plan, unknown, using Planning Portal.
- Statutory Metric Tool, 15th December 2025 by Stuart Carruthers
- Arboricultural Statement (No Trees Present), no date by unknown.

The proposed application relates to the change of use of land to residential use to accommodate two static caravans. A site visit was undertaken to establish an overview of the site context and existing land cover; however, detailed UK Habitat Classification surveys and condition assessments were not undertaken as part of this visit. The site comprises an access track with intermittent vegetation, interspersed with areas of concrete hardstanding, previously disturbed land, open mosaic habitat, neutral grassland, and a ditch running along the north-eastern boundary. The proposed location of the static caravans, as shown on the Block Diagram (15th

Public: Information that can be seen and used by everyone inside and outside the Council.

December, Unknown) and reviewed against aerial imagery (Figure 1) lies within an area comprising grassland, scattered trees and scrub. During the site visit, a wet ditch was also recorded adjacent to the northern boundary of the access track, confirming the presence of a water feature within the site.

Protected Species:

The applicant has not submitted a full Preliminary Ecological Appraisal (PEA) assessing the impacts of the proposed development on biodiversity or identifying the precautionary and mitigation measures necessary to ensure compliance with relevant legislation and national planning policy. This is contrary to the British Standard *BS 42020:2013 Biodiversity – Code of Practice for Planning and Development*. Instead, the ecological information provided is limited to separate badger and great crested newt (GCN) reports, which do not provide a comprehensive assessment of protected and priority species or habitats present on site.

No precautionary measures or mitigation strategy have been provided in relation to the habitats proposed to be retained within the development, including areas of scrub and derelict land. Furthermore, the submitted information fails to assess or address potential impacts on breeding birds, reptiles, amphibians, hedgehog, water vole and other protected or priority species that may be associated with these habitats. This is of particular concern given that some reptile species and hedgehog are recognised Species of Principal Importance under Section 41 of the Natural Environment and Rural Communities Act 2006.

A full Preliminary Ecological Appraisal is therefore required to establish an ecological baseline for the site, identify protected and priority species constraints, assess the likely impacts of the development, and set out appropriate avoidance, mitigation and enhancement measures. In the absence of this information, the Local Planning Authority cannot be satisfied that the proposal would comply with relevant biodiversity legislation, the mitigation hierarchy, or local and national planning policy, and the application cannot therefore be supported on ecological grounds.

Ecology conclusions

Insufficient ecological information has been submitted to enable the Local Planning Authority to fully assess the impacts of the proposed development on protected and priority species, or to demonstrate compliance with relevant biodiversity legislation and planning policy.

In the absence of a full Preliminary Ecological Appraisal and appropriate species-specific assessments, the proposal is contrary to Policies CP7 of the Wokingham Core Strategy and TB23 of the Managing Development Delivery Local Plan, as well as national guidance. The application cannot therefore be supported on ecological grounds.

Biodiversity Net Gain:

The applicant’s ecologist has submitted a Habitats Plan and Small Sites Metric which classify the access route as hardstanding. However, based on the LPA site visit and

Public: Information that can be seen and used by everyone inside and outside the Council.

supporting photographs, the access track is not considered to comprise sealed hardstanding and is more appropriately characterised as urban derelict land/open mosaic habitat under the UKHab Classification system. Vegetation is clearly present throughout and alongside the track, as well as within the area proposed for the static caravan. As such, the baseline habitat classification is not accepted.

The submitted habitat information is also inconsistent across the application documents. The Habitats Plan identifies approximately 1,410m² of “hardstanding” associated with the access road, 650m² of scrub, and a further 1,400m² area comprising modified grassland, bare ground, and hardstanding. However, within the submitted metric, this same 1,400m² area is categorised as derelict land rather than modified grassland and bare ground. The metric further describes the habitat as being predominantly “hardstanding”, despite the LPA site visit on 24 March confirming the area is primarily long sward grassland (Photos 1-3). No photographic evidence, UKHab survey data, or justification has been provided to support the habitat classifications used by the applicant ecologist.

Further concerns arise from the metric’s assumption that the 1400m² area of derelict land will be fully retained and enhanced, despite the proposed siting of a static caravans and associated infrastructure works. It is unclear how these habitats could realistically be retained in their existing condition whilst accommodating foundations, hardstanding, access improvements, and service connections.

Overall, the habitat classifications used within the metric appear to significantly underrepresent the site’s existing biodiversity value. Habitats observed on site have been classified as hardstanding, derelict land or scrub despite site evidence indicating they are more accurately described as derelict land - open mosaic habitat, neutral/modified grassland, scrub and trees. These habitat types would generate measurable biodiversity units within the statutory metric, whereas the classifications selected within the submission create limited or no biodiversity value. In addition, the access track itself would likely require formal surfacing works to function as an operational access route, resulting in further habitat loss which has not been accounted for within the assessment.

The submitted metric also fails to include the watercourse ditch running alongside the access track, despite this feature falling within the red line boundary and being likely to experience direct impacts from access and construction activities.

No Preliminary Ecological Appraisal (PEA) has been submitted to identify ecological constraints or establish appropriate mitigation and protection measures for retained habitats, including scrub, derelict land/open mosaic habitat, and the watercourse corridor. Consequently, the application fails to demonstrate how retained habitats would be protected during construction or managed in the long term.

The submitted metric therefore fails to demonstrate compliance with the statutory biodiversity requirements of the Environment Act 2021. The baseline habitat classifications are inconsistent, unsupported by survey evidence, and do not provide confidence that the site’s pre-development biodiversity value has been accurately assessed in accordance with the statutory biodiversity metric and UKHab guidance.

Public: Information that can be seen and used by everyone inside and outside the Council.

Accordingly, the submitted metric and habitat information are considered inadequate and contrary to best practice guidance. A revised submission prepared by a suitably qualified ecologist is required, supported by a detailed UKHab survey, habitat condition assessments, photographic evidence, and clear justification for all habitat classifications applied. The revised metric should accurately reflect the habitats present on site, realistically assess habitat losses and retention, and provide appropriate biodiversity enhancement measures.

Similarly, the submitted arboricultural information cannot be accepted. The arboricultural plan states that there is no vegetation present on site, which directly conflicts with site photographs and aerial imagery showing the presence of trees and vegetation within the application boundary. The report also fails to identify an author, survey date, methodology, or supporting plans and photographic evidence. Consequently, insufficient information has been provided to robustly assess arboricultural impacts.

Newts (Naturespace):

- The development falls within the red impact zone for great crested newts. Impact risk zones have been derived through advanced modelling to create a species distribution map which predicts likely presence. In the red impact zone, there is highly suitable habitat and a high likelihood of great crested newt presence.
- There are 9 ponds within 500m of the development proposal, the closest of which are 60m, 70m, and 75m to the north, and 80m to the west of the site boundary.
- There is good connectivity to the wider landscape to the northwest and southwest of the site, with hedgerow networks, woodland parcels, and scattered ponds.
- Previous ecological surveys of 3 ponds within 100m of the site show they are highly suitable for GCN

The applicant has not provided any ecological information for great crested newts on the site.

Ecological information is available for an adjacent development immediately north of the A327. Surveys were undertaken in 2022 on the 3 ponds to the north of the site: Ecological Impact Assessment, 'Land at Duck's Nest, Arborfield', Thomson Environmental Consultants, September 2025. Of these, pond 1 (P1, north-western most) and pond 3 (P3, south-eastern most) returned negative results, with likely absence assumed for pond 2 (P2, middle) due to low water levels preventing sampling.

The results of these surveys are 4 years old. CIEEM Guidelines for Ecological Report Writing (CIEEM, 2017) states that if the age of the data is between 18 months to 3 years an updated survey and report will be required and anything more than 3 years old "The report is unlikely to still be valid and most, if not all, of the surveys are likely to need to be updated".

Habitat suitability index (HSI) assessments were completed in 2024 by Thomson

Public: Information that can be seen and used by everyone inside and outside the Council.

Environmental Consultants for the same ponds (P1-P3), all three returning 'excellent' scores, with an update walkover in 2025 confirming the ponds retain this status

A great crested newt statement was provided with this application: Great Crested Newts, Stuart H Carruthers, January 2026. The statement reads "The habitat on the land is suitable for Great Crested News that do not form part of a breeding population due to lack of suitable ponds. Any local population present is doomed to become extinct.". The breeding potential of the nine ponds within 500m of the development site cannot be ruled out without further survey, with the HSI scores of Ponds 1, 2 and 3 already established as excellent. The statement concludes:

- "Finger tip searches of the land are to be undertaken prior to any development and in the unlikely event of Great Crested Newts being found a person holding a Natural England or District Newt Licence contacted to relocate any newts found.

We are not satisfied that the applicant has adequately demonstrated that there will be no impact to great crested newts (GCN) and/or their habitat as a result of the development being approved.

4 ponds are present within 100m of the site boundary, all of which have direct connectivity to the site. 3 of these ponds have already been surveyed and recorded as having 'excellent' HSI scores, the fourth pond has not received any surveying. There are high levels of connectivity between these 4 ponds and the site in the form of grassland and scrub, with a further 2 ponds 440m to the west connected to the site through woodland parcels and hedgerows.

Given the proximity of the site to a collection of ponds, the high levels of connectivity, and its location within the red IRZ, in line with the guidance from Natural England(Great crested newts: District Level Licensing for development projects, Natural England, March 2021), there is a reasonable likelihood that great crested newts will be impacted by the development proposals and therefore, at this time, the applicant has the following options:

1. Provide further information (eDNA of ponds within 500m with connectivity of the site, excluding ponds to the east of the A327), in line with Natural England's Standing Advice, which may be able to rule out impacts to great crested newts. Note that surveys for great crested newts are seasonally constrained and can only take place between April and June. If a positive result is returned, then a European Protected Species Licence (EPSL) may be required with further population assessments necessary. Alternatively, a district licence may be acquired.

2. The District Licence scheme (administered by the NatureSpace Partnership) should be applied for. Under the Wokingham Borough Council district licence, development works that may cause impacts upon GCN can be authorised as part of the planning process.

N.B. The applicant is required to submit a NatureSpace Report or Certificate prior to determination if this option is pursued.

If it is determined from further survey work that the likelihood of impacts to great

Public: Information that can be seen and used by everyone inside and outside the Council.

crested newts is very low, then a precautionary working statement in the form of Reasonable Avoidance Measures (RAMs)/Non-Licenced Method Statement (NLMS) strategy documents completed by a suitably qualified ecologist may be acceptable for the development. However, if survey work confirms the presence of great crested newts, then it is likely that a licensing option will need to be considered (see below for more information)

Environmental Health:

Environmental Heath team have not provided any comments on the application. However, the contamination report indicates that the site poses a low to negligible risk to human health for the proposed residential use and raises no objection on land contamination grounds. In the interests of future occupants, it is recommended that planning conditions are imposed to address the risk of unexpected contamination and to secure verification of any necessary remediation works.

Impact on the Thames Basin Heaths Special Protection Area

The site is within 5km of the Thames Basin Heaths Special Protection Area (SPA) and the use has the potential to increase visitor pressure on the SPA. Without adequate mitigation to avoid potential adverse effects it is contrary to Policy NRM6 of the South East Plan, Policy TB23 of the MDD and Policy CP8 of the Core Strategy.

The appropriate assessment is appended to this report however, to summarise the figures required are:

- SANG: £2,049.59 x 2
- SAMM: £835.00 x 2

Total: **£5769.18**

Although the replacement of static caravans does not ordinarily require planning permission, it is necessary in this instance to control the size and type of units permitted. The SPA avoidance and mitigation contribution has been calculated on the basis of 2-bedroom units, and any increase in unit size or bedroom numbers could result in a greater level of occupancy and visitor pressure on the Thames Basin Heaths SPA. Accordingly, a condition is recommended to ensure the caravans remain as approved, in order to ensure the development does not have an adverse effect on the integrity of the SPA, in accordance with the Conservation of Habitats and Species Regulations 2017 and relevant local policy.

A Section 106 Planning Obligations Agreement can be engaged to mitigate against the impacts on the SPA. However, due to the numerous issues with the application, it was not considered to be it was considered that further discussions would be unnecessary and costly for all parties.

It is also noted that Rooks Nest SANG is approaching capacity. Should its remaining capacity be exhausted by the time any Section 106 agreement were to be completed, alternative SANG provision would be required to ensure compliance with the Thames Basin Heaths SPA mitigation.

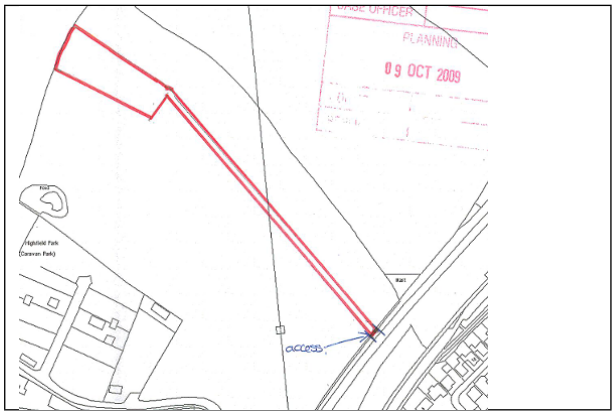
Other matters:

Public: Information that can be seen and used by everyone inside and outside the Council.

Whilst not wholly determinative in themselves, the matters set out below provide additional context and add weight to the concerns identified above.

Planning permission F/2009/2110:

Planning permission F/2009/2110 was for application for “formation of vehicle access with entrance gate. Retrospective”. This was an agricultural access.



There is disagreement regarding the access. The Applicant considers that the site is using an “existing access”. The Council initially considered that the access was abandoned based on Trustees of Castell-y-Mynach Estate v Taff-Ely BC.

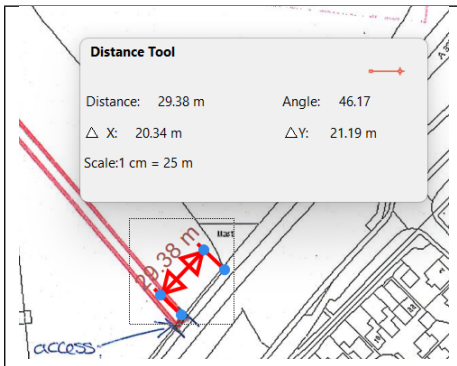
A site visit was undertaken on 26.2.2026, no access existed at this time.

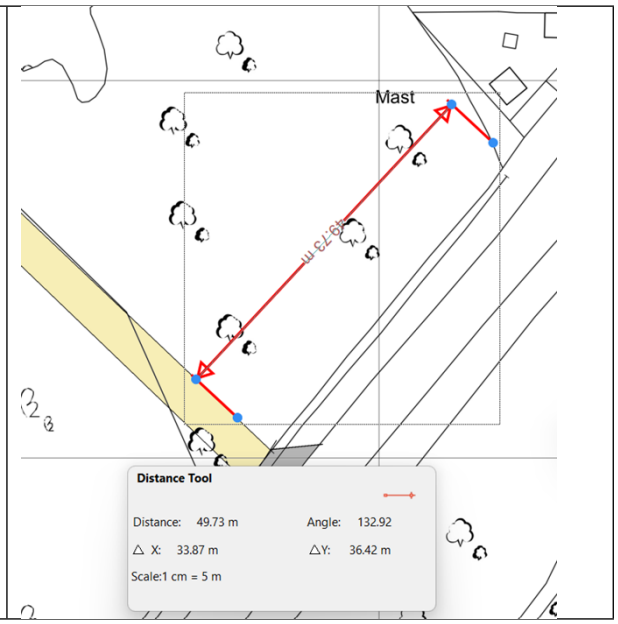
Site visit 26.2.2026	Google Streetview 2024
Google Streetview 2020	Google Streetview 2019

Subsequent investigations have clarified that the access approved under

Public: Information that can be seen and used by everyone inside and outside the Council.

F/2009/2110 is not located in the same position as the access now formed on site. This is confirmed by comparison of the approved plans with the current site layout, including on-site measurements. The red line plan accompanying the 2009 permission clearly relates to a different part of the frontage.





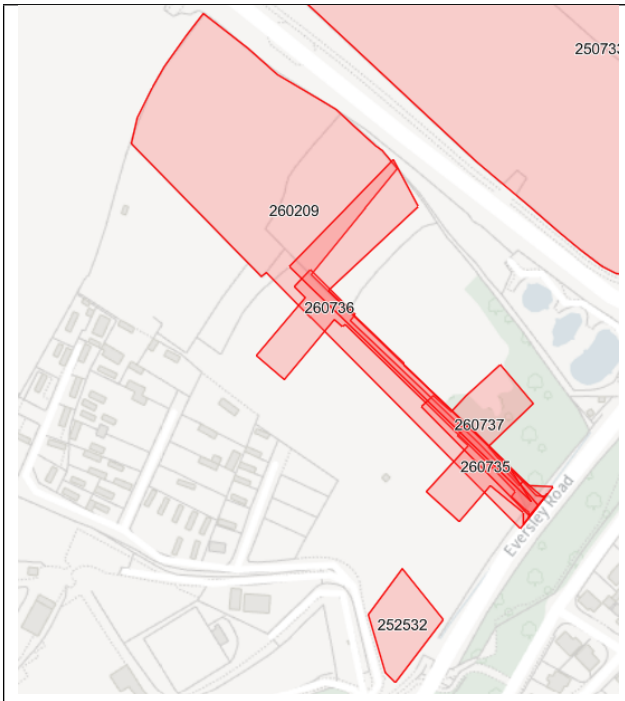
There is no lawful access on the site and therefore accordingly the access must be assessed as a new access onto Eversley Road and the 2009 planning permission has no bearing on this application.

Efficient use of Land

A number of applications have been received for similar development, some of which have not yet met the validation criteria surrounding the proposed site.

Five of these be seen on the plan below:

Public: Information that can be seen and used by everyone inside and outside the Council.



Paragraph 130 of the NPPF states that local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework.

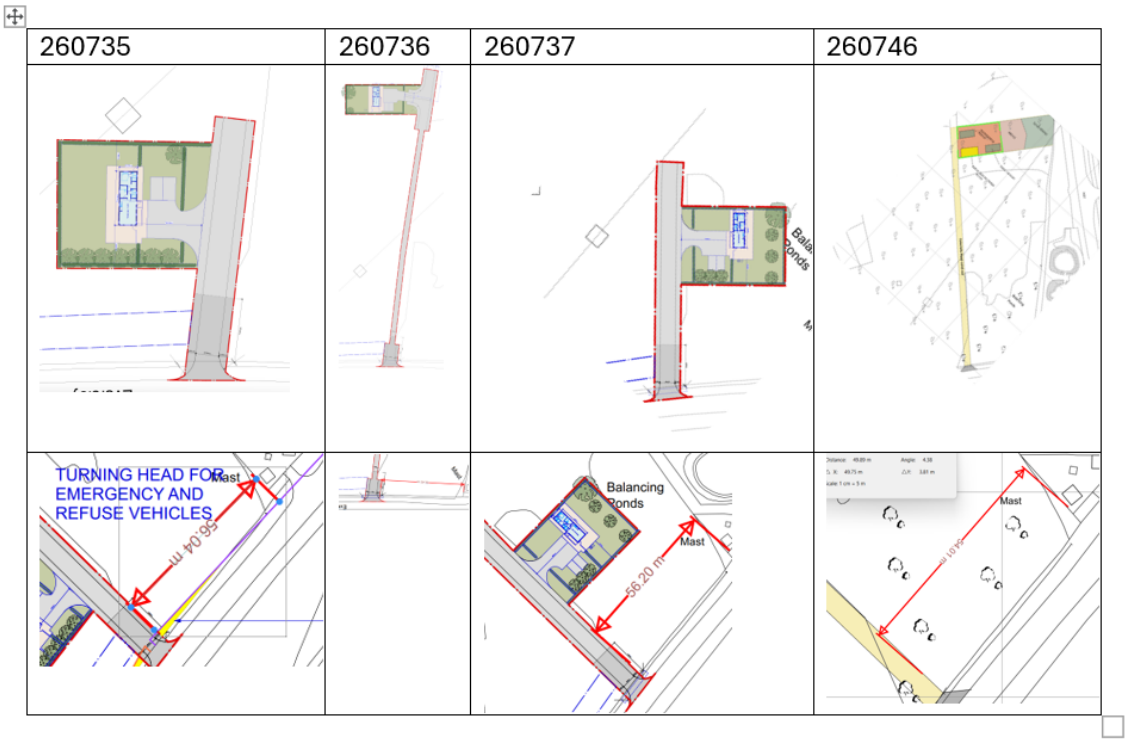
Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site.

In order to make efficient use of land a comprehensive and holistic scheme incorporating a gypsy traveller site would be more efficient use of land and the ad hoc applications for single pitches all with separate accesses are not considered to meet the criteria of 130 of the NPPF. The proposal alone cannot be considered to make efficient use of land.

Notwithstanding this, the three applications utilising “the same” access from Eversley Road have substantially different designs to the road as well as marginally different locations. As such, the access arrangements cannot be regarded as materially the same. The submission of multiple applications utilising a broadly similar point of access does not establish the acceptability of the access in principle, nor does it carry any precedent or fallback weight unless permission has been granted and implemented. Furthermore, the variations between the access designs introduce uncertainty as to the scale and nature of highway works required, making it difficult to fully assess the impact on highway safety and the roadside environment. Given that highway impacts are inherently design-specific, any assessment or comments relating to one access scheme cannot be directly applied to another where the geometry and location differ. The presence of alternative or parallel access proposals therefore does not weigh positively in favour of the development and does not overcome the concerns identified in relation to the access proposed under this application. By establishing a separate access in the position proposed, the

Public: Information that can be seen and used by everyone inside and outside the Council.

development would constrain and potentially prevent the implementation of alternative access arrangements necessary to serve adjoining land and would result in an uncoordinated pattern of development that fails to demonstrate a safe and suitable access strategy for the wider site.



In the absence of a comprehensive masterplan, the Local Planning Authority cannot be satisfied that the individual accesses would operate together as part of a coordinated development strategy. Instead, the proposals present a series of competing access solutions which have the potential to prejudice one another and constrain the future planning of adjoining land.

This is particularly evident in relation to plots 260735;260737 and 260746;260736 which are positioned on opposite sides of the road and propose separate access junctions broadly opposite one another. Whilst each application must be considered on its own merits, the submitted schemes provide no evidence that the location and design of these junctions have been planned as part of a coordinated access strategy. The result is a fragmented pattern of development in which individual plots are designed in isolation, rather than as part of a comprehensive scheme that optimises site capacity, infrastructure provision and access arrangements across the wider site.

While it is acknowledged that this application must be determined on its own planning merits, and that speculative or anticipated future development cannot be taken into account as a determinative factor, the Local Planning Authority is nevertheless aware of the wider circumstances of the site. This includes its planning history, the injunction proceedings, and the associated operational works that have taken place are a material consideration in the determination of these applications. These contextual matters are also material considerations in understanding the pattern and nature of development proposals coming forward and a holistic approach to a caravan site in

Public: Information that can be seen and used by everyone inside and outside the Council.

this location could reduce concerns relating to inefficient use of land.

The submission of multiple, separate applications for individual or small clusters of pitches, each with differing and uncoordinated access arrangements, prevents a comprehensive assessment of the site's capacity and results in a piecemeal and inefficient approach to land use. In the absence of a coherent masterplanned scheme, the Local Planning Authority cannot be satisfied that the site can accommodate the proposed level of development, including the pitch proposed under this application, in a manner that achieves a safe, functional and policy-compliant layout.

As such, the proposal fails to demonstrate efficient use of land in accordance with paragraph 130 of the NPPF and results in an incoherent form of development that exacerbates the identified harms relating to site layout, access, and encroachment into the countryside.

For the avoidance of doubt, the Local Planning Authority does not accept that the site is capable of accommodating a greater number of pitches, or even the level of development proposed, without harm. Reference to a comprehensive or masterplanned approach is not an indication that additional or intensified development would be acceptable in principle. Rather, it reflects that, in the absence of a coordinated and properly evidenced scheme, it is not possible to determine the site's capacity or whether any form of development could be accommodated in a policy-compliant manner.

Highways and Utilities assets:

Within the application site there is an existing lamp post, telegraph pole and utilities cabinet. The formation of the proposed access would necessitate the relocation or removal of these assets. At the time of writing, no confirmation has been provided from the relevant statutory undertakers that such works would be acceptable, feasible, or capable of being delivered within the highway or site constraints. In the absence of this information, there remains uncertainty as to whether the access can be implemented as shown, which weighs against the deliverability of the proposal.

Utilities companies have not commented on the application.

Injunction:

The Council was notified on 23.3.2026 that engineering works were taking place on the site in breach of the injunction. This is being pursued separately via an enforcement investigation. The applicant has been requested to return the land to its former condition or the breach will be pursued by through the Courts. As the land not been returned to its former condition; the Council are instructing their legal team.

At the time of submitting the application, no works had taken place at the site, however at the time of the Officer site visit engineering operations had taken place on the verge of Eversley Road.

At the point the application was submitted and validated, it was not retrospective and

Public: Information that can be seen and used by everyone inside and outside the Council.

BNG applied. It is not clear whether the works relate to the planning application therefore it remains as a prospective application at this stage.

Planning Balance:

In weighing the proposal against the policies of the development plan and material considerations, the Local Planning Authority has had regard to the economic, social and environmental dimensions of sustainable development.

Furthermore, whilst the site is affected by surface water flood risk and the proposal comprises a highly vulnerable use, the nature and extent of the identified risk, together with the position of the Council's Drainage Engineer, does not, in this instance, disengage the presumption in favour of sustainable development under footnote 7 to paragraph 11(d) of the NPPF. Notwithstanding, any disengagement would not alter the conclusions of this report.

Social Role:

The proposal would make a limited contribution towards meeting the Borough's identified need for Gypsy and Traveller accommodation at a time when the Council cannot demonstrate a five-year deliverable supply of pitches. This attracts moderate weight in favour of the proposal.

However, that weight is tempered by several factors. The Gypsy and Traveller Accommodation Topic Paper confirms that the identified shortfall is not acute, and no evidence of personal or site-specific need has been provided. In addition, there is no information to confirm that the intended occupiers meet the policy definition of Gypsies and Travellers, nor that they lack access to alternative accommodation. Furthermore the proposal for a single pitch has a limited impact on the overall supply. Accordingly, the social benefits, whilst material, are afforded moderate weight.

Economic Role:

The proposal would generate only limited short-term economic activity associated with site preparation and installation works. Given the small scale of the development and the absence of any ongoing employment use, the long-term economic benefits would be negligible. As such, very limited weight is afforded to the economic role of the development.

Environmental Role:

The proposal gives rise to substantial and multiple environmental harm.

The development constitutes an unjustified and inappropriate form of residential development in the countryside, contrary to the spatial strategy set out in Policies CP1 and CP11. The proposal is not suitably related to an existing settlement and would result in encroachment into open countryside.

The scale, form and layout of the development are not demonstrated and fail to reflect the established pattern of Gypsy and Traveller provision at Highfield Park. The

Public: Information that can be seen and used by everyone inside and outside the Council.

absence of a coherent layout and supporting information prevents the Local Planning Authority from being satisfied that the site can accommodate the proposed development in a safe, functional or policy-compliant manner. The proposal represents a piecemeal and inefficient use of land, exacerbated by multiple associated applications and inconsistent access arrangements.

The development would result in unacceptable harm to landscape character, including the erosion of rural character and adverse impacts on the designated Green Route and tress. This harm would be compounded by the introduction of engineered access infrastructure and domestic paraphernalia across a large site.

In addition, the proposal fails to demonstrate a safe and suitable access onto the highway network. Insufficient information has been provided in respect of visibility, access design, internal layout and vehicle manoeuvring, and the development relies on inconsistent and unproven access arrangements. This gives rise to unacceptable highway safety concerns.

The application is not supported by sufficient ecological information to assess impacts on protected species and habitats, and fails to demonstrate compliance with mandatory Biodiversity Net Gain requirements. Furthermore, no mechanism has been secured to mitigate impacts on the Thames Basin Heaths SPA.

In respect of flood risk, whilst the site lies within Flood Zone 1, it is affected by areas of surface water flood risk and the proposal comprises a highly vulnerable use. No site-specific Flood Risk Assessment, Sequential Test, or detailed drainage strategy has been submitted. As a result, the Local Planning Authority cannot be satisfied that the development would be safe for its lifetime or would not increase flood risk elsewhere. Whilst these matters do not in themselves disengage the tilted balance, they attract significant weight in the planning balance.

Finally, the proposal fails to secure necessary infrastructure contributions, including open space which weigh negatively albeit with reduced weight in light of policy context.

Collectively, these environmental harms attract substantial weight against the proposal. The absence of sufficient information prevents the Council from properly assessing the likely impacts of the proposal. This fundamental evidential deficiency cannot be overcome through the imposition of planning conditions, as the necessary assessment must be undertaken before a decision is made.

Conclusion:

The presumption in favour of sustainable development as set out in paragraph 11(d) of the NPPF is engaged.

However, when applying the tilted balance, the adverse impacts of the proposal are clear, significant and cumulative. The proposal fails to demonstrate that the development would be appropriately located, safely accessed, or capable of being accommodated in a coherent and policy-compliant manner. It would result in

Public: Information that can be seen and used by everyone inside and outside the Council.

unacceptable harm to the character and appearance of the countryside, give rise to highway safety concerns, fail to adequately address flood risk and drainage, and does not demonstrate compliance with ecological and infrastructure requirements. These harms, when taken together, significantly and demonstrably outweigh the limited social benefits associated with the provision of additional Gypsy and Traveller pitches.

Accordingly, when assessed against the policies of the Framework taken as a whole, and having regard to paragraph 11(d) of the NPPF, the proposal does not represent sustainable development and planning permission should therefore be refused.

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.

In this case, the proposal relates to the siting of caravans and does not involve the creation of new internal floorspace for which a Gross Internal Area (GIA) can be calculated. As such, the development does not constitute CIL-liable development and no Liability Notice or Assumption of Liability Notice is required.

The Public Sector Equality Duty (Equality Act 2010):

In determining this application, including the decision to refuse planning permission, the Council has had due regard to its obligations under Section 149 of the Equality Act 2010 (the Public Sector Equality Duty).

It is acknowledged that the applicants are understood to be members of the Gypsy and Traveller community, which is a group protected under the characteristic of race. The Council has therefore carefully considered the potential impacts of the proposal and the decision on persons with this protected characteristic, including the need to eliminate discrimination, advance equality of opportunity and foster good relations.

Notwithstanding this consideration, the identified planning harms are considered to be significant and cannot be overcome through the imposition of conditions or mitigation.

The decision has been reached on the planning merits of the proposal, having had proper regard to equalities matters and without unlawful discrimination.

Human Rights:

In considering this application, the Council has had regard to its obligations under the Human Rights Act 1998, including Article 8 (the right to respect for private and family life and the home) and Article 14 (protection from discrimination). It is noted that the application site is currently unoccupied and no person resides on the land.

As such, the refusal of planning permission would not interfere with any existing right to a home or to private and family life. The decision has been taken on planning

Public: Information that can be seen and used by everyone inside and outside the Council.

grounds, applies equally to all, and does not give rise to unlawful discrimination. Accordingly, it is concluded that the refusal does not result in a breach of Articles 8 or 14.

RECOMMENDATION	
Conditions agreed:	Not required
Recommendation:	Refuse
Date:	14 July 2026
Earliest date for decision:	15 May 2026

Recommendation agreed by: **(Authorised Officer)**	BJC
Date:	**22.07.26**

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 **3.2 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

Public: Information that can be seen and used by everyone inside and outside the Council.

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 no 2 bedroom dwellings** [caravans] within 5km of the SPA which results in a total SANG contribution of **£4099.18**

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 **£ 1106.78.**

The total SPA related financial contribution for this proposal is **£5769.18.** 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

Public: Information that can be seen and used by everyone inside and outside the Council.

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 **X 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-

Public: Information that can be seen and used by everyone inside and outside the Council.

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 located within a SDL, SANG will have to be provided at a minimum of 8 ha per 1,000 new residents for any dwellings within 5km of the TBH SPA, and between 1.73-2.16 ha per 1,000 new residents for any dwellings between 5-7km from the TBH SPA (based upon an individual assessment). The SANG will be constructed and delivered to Natural England's quality and quantity standards and the developer will need to make an appropriate contribution towards in perpetuity maintenance of the SANG. An occupation restriction will be included in the Section 106 Agreement in order to ensure that the SANGs are complete and open to the public prior to the 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 **2no. no residential units,** broken down as follows: **2.no no 2 bedroom dwellings [carvans]**. 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	0
2 bedrooms	£2,049.59	2 x 2049.59
3 bedrooms	£2,690.93	0
4 bedrooms	£3,546.86	0
5 bedrooms	£4,240.62	0
Total SANG Contribution		**£4099.18**

Public: Information that can be seen and used by everyone inside and outside the Council.

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 **1no. 2 bedroom dwellings [caravans]** 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	0
2 bedrooms	£835.00	2 x 835
3 bedrooms	£1,077.00 or	0
4 bedrooms	£1,267.00 or	0
5+ bedrooms	£1,447.00 or	0
Total SAMM Contribution		**£1670**

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

Public: Information that can be seen and used by everyone inside and outside the Council.

following reason for refusal.

5. Example Reason for Refusal

In the absence of a planning obligation or other alternative mechanism 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:		**Signed:**	

Public: Information that can be seen and used by everyone inside and outside the Council.

Draft Refusal Reasons:

Principle	The proposed development represents an unjustified form of residential accommodation within the open countryside, outside any defined settlement boundaries. The site does not fall within any recognised exception for development set out in CP11 and is not suitably related to an existing settlement. As such, the proposal conflicts with the spatial strategy and would constitute inappropriate development in the countryside. While the proposal would make a limited contribution towards the Borough's identified need for Gypsy and Traveller accommodation, this attracts only moderate weight given that the identified shortfall is not acute and no site-specific or personal circumstances have been advanced to justify a departure from policy. The proposal is therefore contrary to Policies CP1, CP2 and CP11 of the Core Strategy, Policy TB10 of the Managing Development Delivery DPD, Policy H10 of the Local Plan Update, and the National Planning Policy Framework and Planning Policy for Traveller Sites.
Unsustainable location	The site is located in an unsustainable location, remote from day-to-day services and facilities, and is not served by safe or suitable pedestrian and cycle infrastructure. Future occupiers would be heavily reliant on the private motor vehicle for all journeys, resulting in an unsustainable pattern of development. The proposal is therefore contrary to Policies CP1, CP4, CP6 and CP9 of the Core Strategy, and the National Planning Policy Framework.
Effective use of land	The proposal fails to demonstrate an efficient and effective use of the site, when taken both singly [and cumulatively] with the associated access arrangements and site constraints. The development is reliant on a shared access across a number of planning application of varying design and standard, incorporating sections that differ in width, construction, and functionality, which has not been shown to operate cohesively or safely as part of a unified scheme. This fragmented approach to access provision, when combined with the overall layout and disposition of development, results in a piecemeal form of development. The cumulative effect including the reliance on substandard and inconsistent access arrangements and the absence of a comprehensive, well-integrated layout, gives rise to an inefficient pattern of development which would unnecessarily constrain the future use and capacity of the land. The proposal therefore represents a suboptimal and poorly coordinated use of a finite land resource, failing to make the best use of the site in a manner proportionate to its context and constraints. The proposal is therefore contrary to Policy CP3 of the Core Strategy, and the National Planning Policy Framework, which seek to secure the efficient use of land and ensure development proposals make optimal and coordinated use of sites.
	The proposal would result in the encroachment of built and domestic form into the open countryside, including hardstanding, access works, and residential paraphernalia, giving rise to an urbanising effect that would erode the intrinsic character and appearance of the

Public: Information that can be seen and used by everyone inside and outside the Council.

	rural area. The proposal is therefore contrary to Policies CP1, CP3 and CP11 of the Core Strategy, and the National Planning Policy Framework.
Landscape	The proposed development, by reason of its scale, layout and lack of a coherent design response, together with insufficient information regarding impacts on existing trees, hedgerows and vegetation, would fail to conserve or enhance the character and appearance of the landscape. The site lies within Landscape Character Areas L2 (Farley Wooded Sand and Gravel Hills) and J2 (Arborfield Cross and Barkham Settled and Farmed Clay) and the Farley Hill Valued Landscape where the prevailing rural character is defined by an open pastoral landscape, strong field patterns, woodland and hedgerow structure, and a dispersed settlement form. The proposal would result in the urbanisation and loss of fields, paddocks and green infrastructure, eroding these defining characteristics and undermining the function of the site as part of an important landscape buffer separating Arborfield Garrison from the wider countryside, leading to cumulative encroachment and suburbanisation. In addition, the development would harm the character, function and visual amenity of the adjacent Green Route Enhancement Area through the introduction of built form and domestication, and would fail to demonstrate a comprehensive approach to the protection and enhancement of green infrastructure. The proposal therefore represents a visually intrusive and poorly integrated form of development that would cause unacceptable harm to landscape character, contrary to Policies CP1, CP3, CP9 and CP11 of the Core Strategy, Policies CC02, CC03 and TB21 of the Managing Development Delivery DPD, Policies IR2, AD1 and AD3 of the Arborfield and Barkham Neighbourhood Plan, the Borough Design Guide SPD, the Wokingham Borough Landscape Character Assessment and Valued Landscape Topic Paper 2024, and Sections 12 and 15 of the National Planning Policy Framework
Tress/TPO	Insufficient information has been submitted to demonstrate that the proposed development would not result in unacceptable harm to existing trees within and adjacent to the site, including those protected by Tree Preservation Order No. 2015/2026, which was made on 25 June 2026 and took immediate provisional effect pending confirmation. No tree survey, Arboricultural Impact Assessment, Tree Protection Plan or Arboricultural Method Statement has been provided to identify the extent, quality and category of the existing tree resource, the likely impacts of the development upon those trees, or the measures necessary to secure their retention and protection. Furthermore, the submitted site layout fails to identify any existing trees and therefore indicates that the development may necessitate the removal of all trees within the site, including protected trees associated with the proposed access road. In the absence of this information, the Local Planning Authority cannot establish whether the development would adversely affect trees which make a positive contribution to the character, appearance and visual amenity of the area, nor whether

Public: Information that can be seen and used by everyone inside and outside the Council.

	appropriate avoidance, retention, protection, replacement or mitigation measures could be secured. The proposal is therefore contrary to Policy CP3 of the Core Strategy, Policy CC03 of the Managing Development Delivery DPD, and the National Planning Policy Framework, which seek to protect and retain trees and other landscape features that contribute to the environmental quality and character of the area.
Highways	Insufficient information has been submitted to demonstrate that the proposed access arrangements would provide a safe and suitable means of access for all users. The application fails to demonstrate that appropriate visibility splays can be achieved at the site access, having regard to the nature of the adjoining highway and likely vehicle speeds, nor does it provide sufficient detail regarding the geometry, width and construction of the access to confirm that it can safely accommodate the expected vehicle movements, including service and emergency vehicles. Furthermore, the submission does not include adequate assessment of the likely traffic generation or its impact on the surrounding highway network, and there is no robust evidence, including tracking or swept path analysis, to demonstrate that vehicles can safely enter, manoeuvre within, and exit the site in a forward gear. The development is reliant on a shared access of varying design and standard, incorporating sections that differ in width, construction, and functionality, which has not been shown to operate cohesively or safely as part of a unified scheme. The access relies on a culvert crossing, and insufficient information has been provided regarding its structural capacity, condition, and ability to accommodate the increase in vehicular loading, or to ensure that it would remain safe, functional, and resilient in flood conditions. In the absence of this information, the Local Planning Authority cannot be satisfied that the development would not result in unacceptable impacts on highway safety or the efficient operation of the local highway network. The proposal is therefore contrary to Policy CP6 of the Core Strategy, Policy CC07 of the Managing Development Delivery DPD, Policy C2 of the Local Plan Update, and the National Planning Policy Framework.
Ecology	In the absence of adequate ecological survey information, including a Preliminary Ecological Appraisal and any necessary protected species surveys, the Local Planning Authority cannot assess the likely effects of the development on biodiversity, protected species or habitats. The proposal is therefore contrary to Policy CP7 of the Core Strategy, Policy TB23 of the Managing Development Delivery DPD, and the National Planning Policy Framework.
BNG	The submitted information fails to demonstrate, through an appropriate and robust biodiversity metric, that the development would achieve the required minimum 10% biodiversity net gain. The proposal is therefore contrary to the Environment Act 2021, Policy NE2 of the Local Plan Update, and the National Planning Policy Framework.

Public: Information that can be seen and used by everyone inside and outside the Council.

SPA	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.
TB08	In the absence of a completed Legal Agreement, the proposed development fails to make adequate contributions to sport and recreational facilities, contrary to MDD Local Plan policy TB08, Core Strategy policy CP4 and sections 4 and 8 of the NPPF

Public: Information that can be seen and used by everyone inside and outside the Council.