

DELEGATED OFFICER REPORT



WOKINGHAM
BOROUGH COUNCIL

Application Number:	261171
Site Address:	Charlton Lane, Swallowfield, Berkshire
Expiry Date:	20 July 2026
Site Visit Date:	4 June 2026
Proposal: Full application for the change of use of land to a caravan site for the proposed erection of 5no. gypsy and traveller pitches, each incorporating a static caravan, touring caravan, single-storey day room, bin store, associated parking, access, boundary treatment, hardstanding and hard and soft landscaping.	

PLANNING POLICY	
National Policy	National Planning Policy Framework (NPPF) National Planning Policy Guidance (NPPG)
Core Strategy (CS)	CP1 – Sustainable Development CP2 – Inclusive Communities CP3 – General Principles for Development CP5 – Housing Mix, Density and Affordability CP6 – Managing Travel Demand CP7 – Biodiversity CP8 – Thames Basin Heaths Special Protection Area CP9 – Scale and Location of Development Proposals CP11 – Proposals Outside Development Limits CP17 – Housing Delivery
MDD Local Plan (MDD)	CC01 – Presumption in Favour of Sustainable Development CC02 – Development Limits CC03 – Green Infrastructure, Trees and Landscaping CC04 – Sustainable Design and Construction 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 TB10 – Traveller Sites TB21 – Landscape Character TB23 – Biodiversity and Development
Joint Minerals and Waste Plan (JMWP)	DM1 - Sustainable Development DM3 - Protection of Habitats and Species DM4 - Protection of Designated Landscape DM5 - Protection of the Countryside DM9 - Protecting Health, Safety and Amenity DM10 - Flood Risk

Wokingham Borough Local Plan Update (LPU)	SS15 – Securing infrastructure SS16 – Safeguarded routes C3 – Active travel C4 – Green and blue infrastructure and public rights of way C5 – Parking and electric vehicle charging H10 – Traveller sites
Other	Borough Design Guide Supplementary Planning Document CIL Guidance + 123 List Affordable Housing Supplementary Planning Document Sustainable Design and Construction Supplementary Planning Document Swallowfield Village Design Statement

PLANNING HISTORY

Application No.	Description	Decision & Date
	There is no relevant planning history for the site.	

CONSULTATION RESPONSES

Internal

WBC Affordable Housing – Request 40% commuted sum contribution in lieu of two units to met policy requirement.

WBC Environmental Health – No objection, subject to caravan Licencing conditions.

WBC Drainage – No objection, subject to condition.

WBC Highways – Request further information.

WBC Growth & Delivery (Planning Policy) – Refer to Pre-App comments (251662):
Summary of comments:

Principle of development (Policy TB10):

- *Proposal conflicts with adopted policy as the site is not within or adjacent to a defined settlement.*

Flood risk / constraints:

- *Parts of the site and access are affected by surface water flood risk, which may act as a constraint.*

Emerging policy (Policy H10):

- *Moderate weight can be given; allows countryside sites if well related to a settlement, subject to accessibility and safe access.*

Settlement relationship & access:

- *Further assessment required on whether the site is well related to Swallowfield and has safe and suitable highway access.*

Plan allocation:

- *Site is not allocated and was not assessed through the Local Plan process.*

Need for pitches:

- *Evidence identifies a significant unmet need, which is a material consideration*

WBC Economic Prosperity & Place (Community Infrastructure) – No comments received.

WBC Landscape and Trees – Request further information.

WBC CIL – No comment to make.

WBC Ecology – Request further information.

WBC Waste Services – No comments received.

WBC Green Infrastructure – Request further information.

External

Southern Gas Networks – No gas pipes present on site.

Thames Water Utilities Ltd – No comment to make.

Royal Berkshire Fire & Rescue – No comments received.

REPRESENTATIONS

Parish/Town Council	Objection. Concerns relate to: - Inappropriate location outside village envelope. - Increased traffic on single track lane. - Inadequate infrastructure and services. - Impact on surface water flooding. - The site is not allocated in the Local Plan Update. - Tilted balance not engaged.
Ward Member(s)	Councillor Edmunds and Councillor Johnson – Request for the - Overdevelopment development. - Unsustainable development. - Contrary to local and national policy. - Drainage concerns.
Neighbours	207 Letters of objection. The principal concerns raised are: Highway Safety and Access: Objections highlight the constrained nature of the surrounding highway network, which comprises narrow single-track rural lanes with limited passing places. Concerns are raised that the proposal would result in increased traffic movements leading to conflict between vehicles and pedestrians, hazardous manoeuvring, and potential congestion. Additional concerns relate to inadequate visibility at the site access, the suitability of the local road network to accommodate larger vehicles, and the potential impact on emergency vehicle access. Principle of Development / Countryside Location: Representations object to the proposal on the basis that it constitutes development within the open countryside outside defined settlement limits. It is considered by respondents that the proposal would conflict with policies seeking to protect the countryside from inappropriate development and would contribute to incremental urbanisation.

	Flood Risk and Drainage: Concerns are raised regarding the capacity of the existing drainage and sewerage infrastructure, with reference to existing constraints in the local network. It is considered that the introduction of additional hardstanding could increase surface water runoff and exacerbate localised flooding issues. Landscape, Character and Ecology: Objections state that the proposal would result in the loss of rural character, with the introduction of hardstanding, fencing and associated infrastructure considered to urbanise the site. Concerns are also raised in respect of potential impacts on local habitats, hedgerows and the wider ecological environment. Sustainability and Local Infrastructure: Representations raise concerns regarding the site's limited access to services and facilities, including schools, shops and healthcare provision, and the reliance on private vehicles. It is also considered that existing local services are already under pressure. Impact on Character and Residential Amenity: Objectors consider that the proposal would adversely affect the character of the village and raise general concerns in relation to traffic, safety, and overall impacts on the living conditions of the local community. Other Matters Raised: Several representations raise generalised concerns regarding safety and the perceived impact on the community, as well as several submissions which simply object to the proposal without providing detailed planning reasons.
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APPRAISAL

Site Description:

The application site is located close to the road junction of Charlton Lane and Trowes Lane, Swallowfield. The site is approximately 0.32 hectares in size and has a perimeter surrounded with vegetation including trees, hedgerow and scrub. The central area consists predominantly of grass, scrub and some low mounds. The site is outside settlement limits in countryside. Swallowfield village centre is approximately 530m to the north.

The existing woodland to the north and east of the site extends into the northern and eastern site boundaries. Close to the site to the southeast are two Public Rights of Way – SWAL 16 and SWAL 17. The public footpaths connect Swallowfield eastwards through to open countryside. Swallowfield Conservation Area lies approximately 550m to the northeast of the site.

Adjoining the northeastern corner of the site is an area identified as Priority Habitat in the Berkshire Habitat Inventory. The area is listed as S41 for Lowland mixed deciduous woodland.

The site is identified as having groundwater levels as either at or very near (within 0.025m) of the ground surface according to the Council's JBA (Risk Management) groundwater flood risk map. Within this zone there is a risk of groundwater flooding to both surface and subsurface assets. Approximately 225m to the east is land either side of Blackwater River which is in flood zone 3. There is also a drainage ditch that runs along the front boundary of the site.

There is one existing gated access located close to the Charlton Lane, Trowes Lane junction that provides vehicle access to the site.

Proposal:

This application seeks approval for the change of use of the land for the siting of no. 5 Gypsy and Traveller pitches and associated landscaping, fencing and parking. Each pitch would comprise no.1 two-bedroom static unit, no.1 day room, bin store and no.2 parking spaces.

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 (MDD) 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.

GRT Need and Supply:

Policy Context:

The national planning policy document 'Planning Policy for Traveller Sites' (PPTS) was updated in December 2024 in line with the NPPF (2024). The update was limited to clarity regarding traveller sites in the Green Belt. This is not within the Green Belt.

The latest Council's full assessment of the accommodation needs for the Gypsy and Traveller community is the Gypsy and Traveller and Travelling Showperson Accommodation Assessment (2023) (GTAA 2023). The GTAA 2023 was prepared to accord with the superseded PPTS. This document therefore assessed the overall cultural accommodation needs of all Gypsy and Traveller households, as well as the specific need of nomadic households as defined in the superseded PPTS.

The GTAA 2023 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. An overview of the need identified by GTAA 2023 is set out in the table below:

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

<u>Period (years)</u>	<u>Cultural need (pitches)</u>	<u>Of which PPTS Superseded need (pitches)</u>
5yr pitch need (2022/23 to 2026/27)	35	35
Longer-term need (2027/28 to 2039/40)	51	18.2
Total pitch need (2022/23 to 2039/40)	86	53

Figure 1: Table 1 GTAA 2023

The GTAA 2023 considers all past delivery and supply of pitches (24 pitches approved and implemented post the previous GTAA).

The updated PPTS (2024) currently requires local planning authorities to ensure they have a supply of specific deliverable sites sufficient to provide 5 years' worth of pitches/plots against a locally set requirement. The adopted development plan does not include a locally set requirement. The council therefore considers the sufficiency of supply against the GTAA 2023.

This new baseline position means that the council is currently unable to demonstrate a five-year supply of pitches, in part due to the timing of the GTAA 2023 being finalised. This weighs in favour of the scheme. PPTS paragraph 28 states:

"If a local planning authority cannot demonstrate an up-to-date 5 year supply of deliverable sites, this should be a significant material consideration in any subsequent planning decision when considering applications for the grant of temporary planning permission".

The potential supply of pitches is a material consideration that would weigh positively in the planning balance; however, this must be assessed in the context of wider material considerations applicable to the proposal.

Notwithstanding the five-year land supply position for GRT pitches, as per paragraph 23 of the PTTS, planning law requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise. This is in accordance with S38(6) of the Compulsory Purchase Order 2004 (as amended); however, the tilted balance is engaged to some degree given the Council's supply position.

As per paragraph 25 of the PPTS, the LPA 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 site
- 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

Accordingly, in line with the Development Plan, the application must be assessed against Policy TB10 and CP2 of the MDD and Core Strategy respectively (to be covered later in this report).

MDD Policy TB10 is a PPTS compliant policy which states that planning permission may be granted for new Gypsy and Traveller pitches or extensions to existing sites where several criteria are satisfied. An application would need to demonstrate how the proposal complies with all the criteria in this policy.

Paragraph 26 of the PPTS states that when considering applications, local planning authorities should attach weight to the following matters:

- a) effective use of previously developed (brownfield), untidy or derelict land
- b) sites being well planned or soft landscaped in such a way as to positively enhance the environment and increase its openness
- c) promoting opportunities for healthy lifestyles, such as ensuring adequate landscaping and play areas for children
- 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.

Inclusive Communities:

CS Policy CP2 states that new development should contribute to the provision of sustainable and inclusive communities to meet long term needs. Planning permission will be granted for proposals that address the requirements of:

- d) The specific identified needs of minority groups in the Borough, including Gypsies, Travellers and Travelling Showpeople and black and minority ethnic groups. Proposals for gypsies, travellers and travelling showpeople will demonstrate that:

- i) The site is located either within or close to the development limits of a settlement in policy CP9 in order to maximise the possibilities for social inclusion and sustainable patterns of living; and
- ii) The proposed site is not disproportionate to the scale of the existing settlement whether singly or cumulatively with any existing sites in the area.

Emerging Local Plan:

The Local Plan Update (LPU), the plan which on adoption will supersede the adopted CS and MDD local plans.

To date, only limited weight has been attributed to the emerging LPU as a whole. Hearing sessions were carried out in July 2026. The Council is now waiting for the Inspector's response letter which will outline the main modifications to main policies.

As such, this means that only limited weight can be given to it at this time.

It is therefore necessary for the LPA to make decisions in accordance with the current Development Plan and have due regard to any other material considerations until such time as the LPU has progressed further.

Countryside:

The site is located outside the settlement boundary and in the countryside.

Paragraph 14 of the PPTS (Planning Policy for Traveller Sites) 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. A development of this scale is not thought to dominate the nearest settled community of Swallowfield.

Paragraph 15 of the PPTS states *"If there is a lack of affordable land to meet local traveller needs, local planning authorities in rural areas, where viable and practical, should consider allocating and releasing sites solely for affordable traveller sites.*

This may include using a rural exception site policy for traveller sites that should also be used to manage applications. A rural exception site policy enables small sites to be used, specifically for affordable traveller sites, in small rural communities, that would not normally be used for traveller sites. Rural exception sites should only be used for affordable traveller sites in perpetuity. A rural exception site policy should seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection, whilst also ensuring that rural areas continue to develop as sustainable, mixed, inclusive communities."

The LPA acknowledges the current limited supply which is not meeting demand adequately. However, in this instance, the provision of affordable pitches is not being sought.

Paragraph 26 of the PPTS outlines that Local planning authorities should very strictly limit new traveller site development in open countryside that is away from existing settlements or outside areas allocated in the development plan. The site is not allocated in the development plan and is located within the defined countryside.

Similarly, Policy CP11 of the Core Strategy does not permit development outside of development limits unless it falls within the following exemption criteria:

- A sustainable rural or recreational enterprise, where it does not lead to excessive expansion away from the original building and is contained within a building suitable for conversion (CP11 1, 2 and 3)
- Residential extensions or replacement dwellings where it does not result in inappropriate increases in scale, form or footprint or would bring about environmental improvement (CP11 4 and 5)
- Community facilities (CP11 6)
- Affordable housing on rural exception sites adjacent to modest or limited development locations and a localised need is demonstrated (CP11 7)

The proposal fails to comply with any of the criteria within CP11.

Greenfield Land:

The application proposals would introduce no. 5 gypsy pitches to an area of undeveloped (greenfield) grassland within immediate proximity to Trowes Lane. This area of land notably contributes to visual amenities of Trowes Lane and its rural, undeveloped setting. Therefore, the density of the development proposed on this modest 0.32 hectare site, along with the associated residential paraphernalia, road surfacing and boundary treatments, would notably alter the appearance of the site as it appears today.

While the site does not constitute previously developed land, given its location of circa 118m from an approved housing development, it is not considered to be entirely detached from existing settlements.

Notwithstanding the above, as the proposal constitutes the development of a greenfield site, substantial weight cannot be afforded to the proposal as the site falls outside of settlement limits.

However, paragraph 14 of the PPTS states that when assessing the suitability of sites in rural settings, the local planning authority should ensure that the scale of such sites does not dominate the nearest settled community and thus, this is a matter in favour of the proposal.

Gypsy and Travellers – Policy Application:

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.

In terms of policy application, Policy TB10 of the MDD Local Plan relates to Traveller Sites, stating:

Planning permission may be granted for new gypsy and traveller pitches or travelling showpeople plots or extensions to existing sites where it can be demonstrated that:

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.

The proposal is located circa 8235m from the boundary of the limited development location of Swallowfield, which forms a settlement. However, the site is only approximately 118m from the southern edge of a site that has permission (230422) for 81 dwellings allowed at Appeal (dated 19/07/2024). The site is therefore considered to be adjacent to settlement.

b) Avoids impacting on the separate identity of settlements

Given the scale of development and its separation from settlement limits to the south, it is unlikely that the proposal would create settlement coalition.

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

The site would have access to a range of local services such as a shop, medical centre but no school. It is noted however, that access via Trowes Lane would be unsafe by virtue of a lack of footpaths, lighting and single-track lane with national speed limits.

d) No significant barriers to development exists 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 predominantly within Flood Zone 1, but the groundwater levels are high and are either at or very near (within 0.025m – ArcGIS Mapping) of the ground surface. The site is not near contaminated land. The Council's Drainage Officer has reviewed the submitted information and requests a drainage strategy plan to demonstrate how the pitches would connect to the pipe network to prevent increased flood risk from surface water run-off.

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

The proposed density and layout are satisfactory relative to the size and shape of the site. However, insufficient information has been submitted to demonstrate that the

proposed development would not lead to unacceptable impacts on the character and appearance of the surrounding landscape.

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

The proposal would be located approximately 118m south of the residential development approved under permission 230422 for 81 dwellings. Surrounding the land to all other sides is open farmland and woodland and therefore, it is unlikely to significantly and detrimentally impact the amenity of any 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 does not relate to a mixed-use proposal.

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

The proposal is located within 5km of the Thames Basin Heath (TBH) Special Protection Area (SPA) and represents habitats development. As the proposal involves additional residential development within the 5km mitigation zone, the applicant is required to provide a financial contribution as mitigation by purchasing capacity of an existing Suitable Alternative Greenspace (SANG). Without securing SANG and SAMM, the application does not pass the Appropriate Assessment. Accordingly, it has not been demonstrated that the development would avoid likely significant impacts upon the SPA. This is also contrary to Policy NRM6 of the South East Plan and Policies CP8 and CP4 of the Core Strategy.

The scheme is therefore not acceptable in principle under policy TB10.

Other material considerations:

Character of the Area:

Policy CP3 of the Core Strategy states that development must be appropriate in terms of its scale, mass, layout, built form, height and character of the area and must be of high-quality design. R1 of the BDG requires that development contribute positively towards and be compatible with the historic or underlying character and quality of the local area.

The BDG and the contents of the Development Plan are the relevant documents which outline good practice guidance and design of GRT sites:

In broad terms, design considerations for suitable locations include:

- Means of access and accessibility to local transport and services;
- Provision of a healthy and safe environment for residents;
- Integration between the site and local community;

- Appropriate ground conditions, site levels and avoidance of areas with high flood risk and Visual and acoustic privacy.

Key considerations for site layout include, but are not limited to:

- A clear demarcation of boundaries that is sympathetic to the character of the surrounding area;
- A clear gap of 3m inside the site perimeter boundaries for fire prevention;
- A degree of privacy for individual householders 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 delimitation of public communal areas and private space, with boundaries to each pitch
- A communal play area of children and potentially a building to house communal facilities;
- A 6m separation distance between each caravan, trail and park home for fire safety reasons; and
- Infrastructure such as water and electricity supply, surface water and storm drainage, lighting and waste disposal arrangement.

For the layout of individual pitches/ plots:

- Adequate space for car parking on each pitch;
- Pitch boundary fences;
- 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.

The surrounding area is characterised by a dispersed pattern of development comprising predominantly large, detached dwellings set within spacious plots. This low-

density form of development, together with the intervening areas of open land and vegetation, contributes significantly to the rural character and visual qualities of the countryside. Whilst a more concentrated pattern of development exists within the centre of Swallowfield, this is contained within the defined settlement boundary and does not alter the generally open and spacious character of the countryside surrounding the application site.

Policy CP5 of the CS and Policy TB05 of the MDD require development to achieve an appropriate density that responds positively to local character. Similarly, Principle R10 of the BDG seeks to ensure that development proposals achieve a density that is compatible with the surrounding area.

In this regard, the proposed development is considered to represent a relatively intensive form of development for this rural location. The application seeks permission for five Gypsy and Traveller pitches on a site measuring approximately 0.32 hectares. Given that each pitch may accommodate a static caravan and a touring caravan, the development could result in the siting of up to ten caravans, together with five dayrooms, parking areas, access road infrastructure, domestic storage, refuse facilities and other residential paraphernalia. The proposal would therefore introduce a substantial amount of built form and activity onto a relatively small greenfield site.

The site layout further demonstrates the intensity of the proposed development. Static caravans would be positioned between approximately 1.8m and 2.2m from site boundaries, touring caravans would be located as little as 0.6m from site edges, dayrooms approximately 1m from boundaries, and bin storage areas approximately 1.35m from the site frontage. The limited separation distances and absence of meaningful structural landscaping both around the perimeter and between individual pitches create a cramped and constrained form of development that is not reflective of the spacious character that typifies the surrounding countryside. The lack of opportunities for substantial landscape buffering is indicative of the overdevelopment of the site.

The application site presently comprises undeveloped greenfield land which contributes to the open and rural character of the surrounding countryside. In order to facilitate the proposed development, significant areas of existing vegetation would need to be removed to create the pitches, access, hardstanding, parking areas and associated infrastructure. This would erode the site's verdant appearance and increase the prominence of the development within the wider landscape.

Furthermore, the Highway Authority's visibility requirements would necessitate the substantial reduction of the established frontage vegetation to a maximum height of 0.6m. The loss of this natural screening would expose the site and its built form to views from the public realm and Public Footpath SWAL16, significantly reducing the site's existing visual containment.

The introduction of five pitches, together with caravans, amenity buildings, hardstanding, access roads, parked vehicles, domestic infrastructure and boundary treatments, would urbanise a currently undeveloped parcel of countryside. The proposal would transform the site from a rural greenfield landscape into a noticeably more developed and suburbanised environment. By reason of its density, layout,

appearance and associated activity, the proposal would appear materially more urban in character than the existing rural landscape and would erode the open and undeveloped qualities that presently define the site and its surroundings.

Due to the proposed siting of the touring caravan and dayroom on pitch 4, the static caravan on pitch 5, the refuse collection point and the bin store and dayroom on pitch 1 being in close proximity to the highway, together with the likely removal of some of the existing vegetation to secure visibility requirements, the proposal would be visually intrusive, appearing as a stark intrusion to the verdant site and surrounding context of the open countryside

It is acknowledged that planning permission has been granted for residential development comprising 81 dwellings on land approximately 118m to the north of the application site. However, that development is located adjacent to, and forms a logical extension of, the existing built-up area, with development already established along its northern and western boundaries. As such, it would be perceived as a continuation of the existing settlement pattern rather than an isolated encroachment into the countryside. In contrast, the application site occupies a detached position within the rural landscape, and the proposed development would therefore appear as a distinct and intrusive form of development unrelated to the established pattern of built development in the area.

Accordingly, the proposal would result in an urbanising influence within the countryside and would fail to respect the prevailing character and appearance of the area. The development would cause harm to the rural landscape and to the intrinsic character and beauty of the countryside, contrary to Policies CP3, CP5 and CP11 of the Core Strategy, Policies TB05 and TB21 of the Managing Development Delivery DPD, and the design objectives of the Borough Design Guide.

Occupier Amenity:

Overlooking:

The BDG provides guidance on separation distances to be retained between residential buildings in order to maintain privacy and limit a sense of enclosure. The siting of the static caravans within the site means that all 5 pitches would meet the design requirements set out in the BDG. Therefore, an adequate level of privacy should be retained between the 5 static caravans.

R24 of the BDG 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.

Key considerations for site layout include, but are not limited to:

- A clear demarcation of boundaries that is sympathetic to the character of the surrounding area;
- A clear gap of 3m inside the site perimeter boundaries for fire prevention;
- A degree of privacy for individual householders 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 of children and potentially a building to house communal facilities;
- Infrastructure such as water and electricity supply, surface water and storm drainage, lighting and waste disposal arrangement.

For the layout of individual pitches/plots:

- Adequate space for car parking on each pitch;
- Pitch boundary fences;
- 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.

Assessment:

The proposed site layout demonstrates a clear delineation between the individual pitches and the internal access road. However, insufficient information has been provided regarding the form, height and appearance of the boundary treatments proposed both between the individual pitches and around the perimeter of the site. Whilst the submitted Habitat Assessment Plan indicates that native hedgerow planting would be established along the site boundaries, no details of the species mix, planting density, maturity, or proposed maintenance regime have been provided. As such, it is not possible to determine the effectiveness of the proposed landscaping in providing adequate screening, privacy and visual separation for future occupiers.

The site currently benefits from established mature trees along the northern, eastern and southern boundaries, which contribute positively to the character of the area and provide a degree of visual enclosure. The submitted site plan indicates that these trees would be retained. However, in the absence of an Arboricultural Impact Assessment, there is insufficient information to establish the extent of the root protection areas and canopy spread of the retained trees, or the relationship between those trees and the proposed development.

Notwithstanding this lack of information, the submitted layout indicates that the static caravans proposed on Pitches 1, 2, 3 and 4 would be positioned near the existing mature trees surrounding the site. Consequently, there is uncertainty as to whether adequate clearance would be maintained between the accommodation and overhanging branches. Principle R24 of the BDG advises that caravans should be sited away from overhanging trees in the interests of fire safety. This matter was also specifically highlighted within the Council's pre-application advice, which stated that *"efforts should be made to ensure the tree coverage does not pose a fire safety risk in any future application"*.

In the absence of detailed arboricultural information, the Council cannot be satisfied that the proposed layout provides an acceptable relationship between the retained trees and the proposed residential accommodation, nor that future occupiers would benefit from a safe and appropriately designed living environment. The proposal therefore raises concerns regarding the quality of accommodation that would be provided for future residents.

Neighbour Amenity:

Noise disturbance and Light Spill:

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

While the presence of 5 pitches would afford some noise levels on site, it is unlikely that any significant noise impacts will arise from the proposal as it is for residential caravans only. The Council's Environmental Health Officer was consulted and raised no objection to the proposal.

No information regarding the installation of any external lighting has been submitted.

Paragraph 198 of the NPPF states that planning decisions should ensure that development is appropriate for its location taking into account the likely effects of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so, they should:

- a) Mitigate and reduce to a minimum, potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life.
- b) Identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; and
- c) Limit the impacts of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.

The site is located within a predominantly rural and agricultural landscape characterised by low levels of artificial lighting and limited built development. In the absence of a detailed lighting assessment, insufficient information has been provided to demonstrate that lighting associated with the proposed use would not result in unacceptable light spill or increased illumination levels. As such, the Council cannot be satisfied that the proposal would avoid adverse impacts on light-sensitive ecological receptors, including foraging and commuting bats. The proposal therefore fails to satisfy the requirements of CS policy CP1 and CP7, MDD Policy CC06 & Appendix 1, and Section 15 of the NPPF, which seeks to ensure that light pollution is appropriately mitigated and does not adversely affect health or quality of life, and is consequently considered unacceptable in terms of its impact on nature conservation.

Amenity Space:

Policy TB08 of the MDD Local Plan relates to the provision of onsite open space, sport and recreational facilities within residential development. Proposals for residential development need to demonstrate how they meet local standards. The supporting text for policy TB08 states that Developments will be expected to provide public open space on site. In some cases, for example, small sites where the site cannot physically provide or appropriately accommodate open space, indoor or outdoor play or sport and recreational facilities on-site, the Council will seek a financial contribution to fund off-site provision.

The Council's Green Infrastructure Officer raises no in-principle objection but advises that further information is required before the proposal can be fully assessed. The consultee advises that, as a residential use, the development is required to comply with MDD Policy TB08 through the provision of appropriate public open space and recreation facilities, either on-site or through financial contributions secured via a Section 106 Agreement.

Concerns are also raised regarding the lack of information relating to the site's green infrastructure, landscaping and tree impacts, with an Arboricultural Impact Assessment requested.

In addition, the proposal would be required to secure Suitable Alternative Natural Greenspace (SANG) mitigation in accordance with CS Policy CP8 for habitats development. The officer advises that, should the required open space obligations and SPA mitigation not be secured, the proposal would conflict with Policy TB08 and fail the Habitats Regulations Appropriate Assessment, resulting in a recommendation of refusal.

Locational Sustainability:

Policies CP1, CP4, CP6, CP9 and CP11 of the Core Strategy seek to direct development to sustainable locations with reasonable access to services, facilities and sustainable transport options. In addition, paragraph 4.57 of the CS seeks to avoid the proliferation of development in locations beyond established settlement boundaries where access to services is limited and reliance on the private motor car is likely to be greater.

The application site is located within the designated countryside, outside any defined settlement boundary, approximately 235m from the edge of Swallowfield. The village provides a limited range of day-to-day facilities, including a convenience store, medical centre and public house. The nearest bus stops are located at Swallowfield Grange (approximately 748m from the site) and The Crown public house (approximately 630–714m from the site), providing links to surrounding settlements including Spencers Wood, Riseley and Farley Hill.

Whilst these facilities and services are within walking distance, pedestrian access is constrained by the rural nature of the surrounding highway network. In particular, sections of Trowes Lane are unlit and lack continuous footways, reducing the attractiveness of walking and public transport as alternatives to the private car. However, substantial weight is afforded to the Inspector's findings in Appeal Decision APP/X0360/W/24/3340006 relating to land west of Trowes Lane and north of Charlton

Lane, located approximately 118m north of the application site, where the locational characteristics are materially similar.

The Inspector acknowledged that, whilst the village offers only limited sustainable transport opportunities, measures secured through the appeal scheme would improve access to sustainable modes of travel, including footpath and crossing improvements, bus stop upgrades, bus service contributions and travel plan measures. Nevertheless, the Inspector concluded that the majority of trips to facilities and services outside the village would continue to be undertaken by private car.

Relevant to the current proposal, Condition 9 of planning permission 230422 requires the provision of the Trowes Lane access and associated pedestrian infrastructure prior to occupation of the approved residential development. These improvements would also benefit occupiers of the proposed Gypsy and Traveller site and would improve connectivity between the site and local facilities.

In reaching their overall conclusion, the Inspector found that the appeal proposal conflicted with Policies CP1, CP3 and CP6 of the Core Strategy because of its location outside the settlement and its limited accessibility. However, that conflict was moderated by the availability of basic services within Swallowfield and the opportunities secured to encourage the use of sustainable transport modes. Consequently, only moderate weight was attributed to the locational sustainability harm.

Having regard to the Inspector's conclusions and noting the transport and pedestrian improvements that would be delivered through the implementation of planning permission 230422, it is considered that the application site occupies a less sustainable location than land within defined settlements. Nevertheless, the presence of basic services within Swallowfield and the anticipated infrastructure improvements reduce the extent of this harm. Accordingly, the conflict with the spatial strategy and sustainability objectives of the development plan attracts moderate weight in the overall planning balance.

Highway Access and Parking Provision:

The Council's Highways Officer has reviewed the proposal and raises several concerns regarding the submitted highway information. Particularly, revisions are required to the swept path analysis to demonstrate that a fire tender can safely manoeuvre within the site without overrunning plot boundaries and can enter and exit the site in a forward gear. Amendments are also required to the proposed access gate arrangement, parking layout and parking dimensions to ensure compliance with the Council's adopted parking standards.

Furthermore, the submitted visibility splays have been calculated using adjusted wet-weather speeds rather than actual recorded vehicle speeds. The Highways Officer advises that this approach underestimates the required stopping sight distance and that revised visibility drawings are necessary to demonstrate that safe access can be achieved.

In addition, concerns have been raised regarding the proposed refuse collection strategy. The submitted plans do not demonstrate compliance with the carrying distance standards set out within Manual for Streets, with some pitches located more

than 30m from the proposed collection point. As a result, it has not been demonstrated that the development would provide a satisfactory and practical refuse collection arrangement.

Taken together, the submitted information does not adequately demonstrate that the proposal would provide a safe and suitable means of access, sufficient parking provision, appropriate visibility splays, satisfactory servicing arrangements, or a layout capable of accommodating emergency and refuse vehicles. Consequently, the Local Planning Authority cannot be satisfied that the development complies with Policies CP1 and CP6 of the Core Strategy and Policy CC09 of the Managing Development Delivery DPD. The identified highway concerns weigh against the proposal in the overall planning balance.

Environmental Health:

The Council's Environmental Health (EH) Officer was consulted and raised no objection to the proposal. They conclude that following a review of the GIS EH Mapping systems, there are no signs of land contamination. They raise no objection to the proposal, subject to the caravan Licencing conditions.

Flooding and Drainage:

The site is identified as having groundwater levels as either at or very near (within 0.025m) of the ground surface according to JBA groundwater flood risk map. Within this zone there is a risk of groundwater flooding to both surface and subsurface assets. Approximately 225m to the east is a large area of land either side of Blackwater River which falls within flood zone 3. A Flood Risk Assessment (FRA & Drainage Strategy, Ref: Swallowfield FRA DS O1, Debby Booth, dated 10 November 2025) was submitted to support the application.

The Council's Drainage Officer raises no objection to the proposed development, however, requests further information that could be conditioned. They note that the land is in Flood Zone 1 but in an area that experiences high groundwater levels and low to medium risk of surface water flood with overland flow routes across the site.

The Officer notes that proposed site layout drawing 501 dated 15/05/2025 indicates that aspects of the development will lie along surface water flow paths.

The Officer raises no objection to the principle of development but requests a clear drainage strategy drawing to demonstrate how the pitches connect to the pipe network. It should include the location and sizing of SuDS features, with connections from the pitches and a lining to ensure that groundwater does not ingress and compromise the storage capacity required.

As such, it has not been satisfactorily demonstrated that the proposed development would not result in increased flood risk from surface-water run-off, the application is therefore unsupported in this regard. This is contrary to Section 14 of the NPPF, Core Strategy policy CP1 and Managing Development Delivery Local Plan policies CC09 and CC10.

Landscape and Trees:

The Council's Trees and Landscape Officer reviewed the proposal and requested further information before the application can be fully assessed. The consultee notes that, whilst there are no protected trees on the site, the existing woodland, trees, hedgerows and scrub vegetation surrounding the site are important features that contribute positively to the character of the site and its rural setting.

The site lies within the Riseley Farmed Clay Lowland (I2) Landscape Character Area (2019), which is characterised by open agricultural land, mature hedgerows, woodland blocks, rural lanes and a strong sense of tranquillity and remoteness. The officer notes that the site benefits from woodland in an area where woodland is relatively scarce and considers these landscape features to be valuable landscape attributes that contribute to the character of the immediate surroundings.

The Officer advises that insufficient information has been submitted to assess the impacts of the proposal on existing trees and landscape features. An Arboricultural Impact Assessment prepared in accordance with BS5837:2012 is required to establish the relationship between the proposed layout and the existing vegetation, including the potential effects of the development, services and visibility splays on retained landscape features.

In addition, the submitted site layout plan is considered indicative and does not provide sufficient detail to properly assess the relationship between the proposed development and the site's existing landscape structure. The Officer therefore requests a Landscape and Visual Appraisal to assess the effects of the development on the character and appearance of the site and wider countryside setting in accordance with Policy TB21.

As has been stated earlier in this report, pitches 2, 3 and 4 are within proximity to the existing mature trees surrounding the site. Due to the lack of an Arboricultural assessment, it is not clear what impact the proposed development would have on these trees. It is likely that the proposal would present indirect and long-term pressure through pruning or removal once the site would be occupied. Such increased pressures would result in the incremental loss of canopy and form of the retained trees, as well as the potential for deterioration of the valuable woodland.

Overall, the Trees and Landscape Officer considers that further arboricultural and landscape information is required before the impacts of the proposal on the site's trees, landscape character, visual amenity and countryside setting can be adequately assessed.

In conclusion, it has not been demonstrated that the proposed development would protect the character and appearance of the countryside, nor that existing trees and shrubs would be protected throughout the construction and lifetime of the development.

Ecology:

The Council's Ecology Officer has reviewed the application and requests further information before the proposal can be fully assessed. The officer raises concerns regarding the submitted Biodiversity Net Gain (BNG) information and advises that insufficient evidence has been provided to demonstrate that the development is capable of achieving the mandatory 10% BNG requirement. The submitted metric is considered inconsistent with the proposed development, particularly in relation to

habitat retention, private residential curtilages, hardstanding areas, retained trees, and the extent of proposed habitat creation. Further baseline habitat condition assessments and a revised biodiversity metric are therefore requested.

Regarding protected species, the Ecology Officer considers that insufficient evidence has been provided to justify the conclusion that the site has a low value for bats. The officer notes that surveys undertaken on adjoining land recorded several bat species and that the application site forms part of the same wider habitat network. Concerns are also raised regarding the absence of bat activity surveys, the lack of assessment of two trees proposed for removal, and the absence of information demonstrating that lighting associated with the development would not adversely affect retained habitat corridors. Additional survey information and justification are therefore requested.

The Officer also disagrees with the submitted assessment that the site has low potential for reptiles and amphibians. The officer notes that the site's mosaic of grassland, scrub and other habitat features may provide suitable habitat for reptiles, particularly given records from the surrounding area. Whilst formal surveys are not considered essential, the officer advises that precautionary mitigation measures, including staged vegetation clearance, ecological supervision of groundworks and species protection measures, should be secured through a Construction Environmental Management Plan (CEMP). Similar mitigation measures are also recommended for badgers, hedgehogs and nesting birds.

In addition, the Ecology Officer advises that the application fails to identify any meaningful biodiversity enhancement measures, such as bat and bird boxes, habitat creation or compensatory habitat enhancements, contrary to the requirements of the NPPF and Policy TB23. Further information is therefore required to demonstrate how biodiversity enhancements and compensation measures will be delivered.

Finally, the Officer confirms that the site lies within the 5km Thames Basin Heaths SPA mitigation zone and advises that financial contributions towards Suitable Alternative Natural Greenspace (SANG) and Strategic Access Management and Monitoring (SAMM) will be required and secured through a Section 106 Agreement in accordance with Policy CP8 of the Core Strategy.

Overall, the Ecology Officer requests further information regarding Biodiversity Net Gain, protected species, habitat impacts and biodiversity enhancements before the ecological impacts of the proposal can be fully assessed.

Affordable Housing:

The Council's pre-application advice highlighted that the proposal would be subject to the affordable housing requirements set out in Policy CP5 of the Core Strategy. Policy CP5 requires residential developments of five or more dwellings, or developments on sites of 0.16 hectares or greater, to provide up to 50% affordable housing, subject to viability considerations.

The Council's Economy and Housing Officer has been consulted and confirms that the proposal triggers the affordable housing threshold by virtue of both the number of pitches proposed and the size of the site. The officer advises that, in accordance with Policy CP5 and the Council's adopted Affordable Housing SPD, Gypsy and Traveller

sites are subject to the same affordable housing requirements as other qualifying residential developments.

The Economy and Housing Officer confirms that the proposal generates a requirement for the equivalent of two affordable housing units. Given the scale and nature of the development, the Council would accept a commuted sum payment in lieu of on-site provision. In accordance with the Affordable Housing SPD, this has been calculated as £193,880.07 (index linked) to be secured through a Section 106 Agreement and used towards the provision of affordable housing within the Borough.

No viability appraisal or supporting evidence has been submitted to demonstrate that the provision of affordable housing, or an equivalent commuted sum, would render the development unviable. As such, there is no evidence before the Local Planning Authority to justify a departure from the requirements of Policy CP5.

In the absence of a completed Section 106 Agreement securing the required affordable housing contribution, the proposal would fail to mitigate its impact on affordable housing provision within the Borough and would be contrary to Policy CP5 of the Core Strategy and the Affordable Housing Supplementary Planning Document.

Conclusion:

Taken as a whole, the proposed development would be unacceptable in principle under Managing Development Delivery policy TB10. The site is greenfield and is in the countryside and fails to meet the requirements of policy TB10.

The proposal would make a modest contribution towards addressing the identified unmet need for Gypsy and Traveller accommodation within the Borough and this attracts significant weight in favour of the development. However, the application site is located on a greenfield site within the countryside, and the proposal would fail to comply with the requirements of Policy TB10 of the Managing Development Delivery DPD and Policies CP2 and CP11 of the Core Strategy. Whilst the site is reasonably related to Swallowfield, the development would result in the urbanisation of an undeveloped rural site, causing harm to the character and appearance of the countryside.

In addition, insufficient information has been provided to demonstrate that the proposal would provide a satisfactory living environment for future occupiers, protect existing landscape features or safeguard biodiversity interests. The proposal would also not achieve the required Biodiversity Net Gain, avoid adverse impacts from lighting or provide an acceptable drainage strategy. It has also not been demonstrated that the development would secure a safe and suitable highway layout, nor would it encourage sustainable transport modes. Furthermore, the application fails to secure the necessary affordable housing contribution and Thames Basin Heaths SPA mitigation contrary to policies South East Plan Policy NRM6 (iii) and Core Strategy Policy CP8.

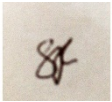
Taken together, the environmental, landscape, ecological, highway and infrastructure harms identified are significant and carry substantial weight against the proposal. Having regard to the development plan and all other material considerations, including the acknowledged need for additional Gypsy and Traveller pitches, it is considered that the adverse impacts of the proposal would significantly and demonstrably outweigh its benefits. Accordingly, the application is recommended for refusal.

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

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

RECOMMENDATION

Conditions agreed:	Not required
Recommendation:	Refused
Date:	25 June 2026
Earliest date for decision:	25 June 2026

Recommendation agreed by: (Authorised Officer)	
Date:	20.7.26

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

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

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

In this instance, the proposed development would result in a net increase of **5 x 2-bedroom dwellings** within 5km of the SPA which results in a total SANG contribution of **£10,247.95**.

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 **£4,175**.

The total SPA related financial contribution for this proposal is **£14,987.95 (including £565 monitoring fee)**. The applicant **must agree** to enter into a S106/s111 agreement to secure this contribution prior to occupation of each dwelling. Subject to the completion of the S106 agreement, the proposal would not lead to an adverse effect on the integrity of the SPA and would comply with SEP Saved Policy NRM6, policy CP8 of the Core Strategy, and the NPPF.

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

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

- a. is likely to have a significant effect on a European site...(either alone or in combination with other plans or projects), and
- b. is not directly connected with or necessary to the management of that site.

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

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

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

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

2. Stage 1 Screening for Likely Significant Effects

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

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

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

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

3. Stage 2 Appropriate Assessment

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

The following policies and guidance set out WBC's approach to relevant avoidance and mitigation measures which have been agreed with Natural England. For the majority of housing developments this will comprise the provision of (or contribution towards) Suitable Alternative Natural Greenspace (SANG) and a contribution towards the Strategic Access Management and Monitoring (SAMM) Project. Developers will be required to secure an appropriate financial contribution for the provision of SANG and to the SAMM project through an obligation in a s106 agreement.

For SDL development (and occasionally some other larger non SDL developments) within 5km of the SPA, SANG is required at a minimum of 8 ha per 1,000 new residents, constructed and delivered to Natural England's quality and quantity standards and a contribution towards pan SPA access management and monitoring (as advised by the Thames Basin Heaths Joint Strategic Partnership Board). For SDL development (and

occasionally some other larger non SDL developments) between 5 and 7km, the proposals will need to be individually assessed but it is likely that SANG will be required on site in line with Natural England's quality and quantity standards, although the exact requirement will be agreed having regard to evidence supplied.

a. Policies and Guidance

For this proposal the following guidance and policies apply:

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

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

b. SPA Avoidance and Mitigation Measures

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

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

As this development is not part of an SDL, the developer may make a payment contribution towards strategic SANGs in line with schedule below (most likely this will be at Rooks Nest Wood SANG although it is subject to SANGs capacity in the right location within Wokingham borough). An occupation restriction will be included in the Section 106 Agreement in order to ensure that the contribution has been made prior to occupation of the dwellings. This gives the certainty required to satisfy the Habitats Regulations in accordance with South East Plan Policy NRM6 (iii) and Core Strategy Policy CP8.

The development will result in a net increase of **5 no dwellings**, broken down as follows: **5 X 2-bedroom dwellings**. Depending on the dwelling mix, the level of SANG payments are set out as follows:

No. of bedrooms	SANG Contribution 5km	Aggregate SANG Contribution
1 bedroom	NA	NA
2 bedrooms	£2,049.59	5 x 2,049.59 = £10,247.95
3 bedrooms	NA	NA
4 bedrooms	NA	NA
5 bedrooms	NA	NA
Total SANG Contribution		£10,247.95

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 5 **no 5- bedroom dwellings**. Depending on the dwelling mix, the level of SAMM payments are calculated as follows:

No. of bedrooms	SAMM Contribution 5km	Aggregate SAMM Contribution
1 bedroom	NA	NA
2 bedrooms	£835.00	5 x 835= 4,175
3 bedrooms	NA	NA
4 bedrooms	NA	NA
5+ bedrooms	NA	NA
Total SAMM Contribution		£4,175

Prior to the permission being granted the applicant must enter into a Section 106 Agreement based upon the above measures.

4. Conclusion

An Appropriate Assessment has been carried out for this development in accordance with the Habitats Regulations 2017. Without any appropriate avoidance and mitigation measures the Appropriate Assessment concludes that the development is likely to have a

significant effect upon the integrity of the SPA with the result that WBC would be required to refuse a planning application.

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

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

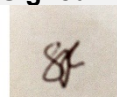
If the applicant does not agree with the above mitigation and does not enter into a Section 106 Agreement to secure the measures, then the application must be refused using the following reason for refusal.

5. Example Reason for Refusal

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

Date: 20.7.26

Signed:

A small, square, light-brown stamp containing a handwritten signature in dark ink. The signature appears to be 'SF' or similar initials.

PLANNING CONSTRAINTS/STATUS

Countryside

1 – 30 to 1 – 100 year risk of Surface Water Flooding

Thames Basin Heath Special Protection Area – 5km Linear Mitigation Zone

Public Rights of Way Consultation Zone

Public Rights of Way – SWAL 16 & 17

Major Nuclear Site – AWE 12km Zone