

PLANNING, DESIGN AND ACCESS STATEMENT to be read in connection with drawings and landscaping documentation for

Brookfield Farm, Old Wokingham Road, RG40 3BU

Full application for change of use of land to a natural burial ground to include parking area, access to Easthampstead Road, single storey pavilion and retention of workshop for storage of plant and machinery for grave digging and maintenance of the land. Landscaping and biodiversity net gain enhancements to include a new tree planting, ponds and wildflower meadow.

“In this world nothing can be said to be certain, except death and taxes”

- Source is a letter that was written from Franklin to French scientist Jean-Baptiste Leroy in 1789

Introduction:

This statement is submitted in support of a planning application for a **proposed natural burial ground including substantial biodiversity net gain enhancements** through landscaping to include a new tree planting, ponds and wildflower meadow.

The site relates to land (identified below) on the southern side of Easthampstead Road from which access would be provided and to the west of Old Wokingham Road within an open field (**non-Green belt** countryside) with native hedgerow and mature trees to the wider northern and eastern boundaries.



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The surrounding area has a mixed rural character comprising commercial, equestrian, residential and agricultural uses set amongst tracts of open land.

The site is not covered by any statutory designations; not AONB, not National Park, not SSSI.

This planning statement sets out proposals for change of use to natural burial ground and the erection of a reception building with associated access, parking and landscaping. This Planning Statement will assess the scheme in the context of local and national planning policy.

This statement should be read in conjunction with other supporting information supplied as part of the planning application including:

- Application Forms;
- Location Plan;
- Existing Site Plan (Topographical Survey);
- Proposed Landscape / Site Plan;
- Plans for the single storey pavilion
- Landscape Visual Impact assessment / supporting landscape documents
- Preliminary Ecology Assessment
- Biodiversity Net Gain statement
- Transport Technical Note.

On the basis that the location is in flood zone 1 a Flood Risk and Drainage Assessment has not been submitted. The applicant is agreeable for drainage matters to be covered by prior to commencement conditions.

The following sections of the statement provide a description of the site and its surroundings, details of the proposal, alongside an overview and assessment of the planning policy context relevant to the proposed development.

This statement has demonstrated that, when considering local and national planning policy, the use of land as a natural burial ground and the installation of associated infrastructure is acceptable. There are no material considerations which would render the proposal unacceptable in planning terms, therefore it is respectfully requested that the application is viewed favourably and approved without delay.

The **traffic light highlighting** and bold type face throughout the Planning Statement emphasises the suitability of the proposal against the material planning considerations as part of the planning balance exercise. The proposed development would represent a planning gain in several respects as outlined within the main body of the statement.

THE PROPOSED DEVELOPMENT.

The proposed natural burial ground is to be located on a plot that is approximately 5.8 hectares in size. The western site contains no buildings; the eastern site contains an existing workshop barn. The site is not located within a conservation area and no buildings nearby are statutorily listed.



It is proposed to create a natural burial ground which will develop naturally to create substantial areas of new wildflower meadow along with native species tree planting across the site, providing significant ecological enhancements and new habitats for protected species. **Local people would be welcome to enjoy what will become a valued local natural resource.**

The proposals incorporate a single storey reception building and car park to the north of the site. The car park would be accessed from Easthampstead Road via an improved field gate access junction leading into the site.

The proposals include additional tree and native shrub planting within and around the site frontage. **An initial 25-year management plan will be instigated for the new tree planting / woodland to provide for managed growth, maintenance and expansion. Woodland planting will comprise native species and will be managed to provide habitats for indigenous wildlife.**

Executive summary

The Government's guidance for operators of Natural Burial Ground (2009) states that a natural burial is a term used to describe the burial of human remains where the burial area creates habitat for wildlife or preserves existing habitats (woodland, species rich meadows, orchards, etc), sustainably managed farmland, in-situ or adjacent aquatic habitats or improves and creates new habitats which are rich in wildlife (flora and fauna).

Natural burial grounds are a more recent alternative for end-of-life arrangements. Whilst cemetery / natural burial grounds applications are few and far between the following links are to similar applications.

- [Change of use from agricultural land to a natural burial ground alongside installation of associated infrastructure](#)

Land OS 481069 339602 Normanton Lane Bottesford

Ref. No: 20/00584/FUL | Received: Mon 01 Jun 2020 | Validated: Mon 22 Jun 2020 | Status: **PERMIT**

- [Change of use of land from agriculture to a woodland burial ground to include new vehicular acces...](#)

Land at Cuckoo Farm, Epsom Road, West Clandon, GU4 7RJ

Ref. No: 11/P/01768 | Received: Wed 28 Sep 2011 | Validated: Thu 06 Oct 2011 | Status: **PERMIT**

The proposal is for natural burials and would follow the success of the award-winning Clandon Wood Burial ground permitted within the Green Belt, outside the settlement boundary in Guildford. See links and images below.

<https://www.clandonwood.com/>

<https://player.vimeo.com/video/664726927>



Above – Images of the pavilion building at Clandon Wood Natural burial ground.

Design and Development Objectives:

High quality rurally appropriate design with siting, layout, scale, form and appearance, absorbing the development in the landscape.

Central tenets of planning are to maintain and enhance the countryside and biodiversity through innovative solutions that use high standards in architecture to help to raise standards of design more generally in rural areas. Proposal would include wildflower meadow, memorial native tree planting and a glass ceremony pavilion building.

In-depth dialogue with the clients, the landscape consultant, architect and myself has culminated in a proposed **landscape led development** that will optimise the efficient use of the land whilst enhancing the landscape character.

Services will take place between 10am and 4pm. Pedestrians can access the site at any time during daylight hours.

The following application is analogously relevant. Officer report approval included as a background document at **APPENDIX 1.**

Appl No: 11/P/01768 8/13 week deadline: 05/01/2012

Appl Type: Full Application

Parish: West Clandon Ward: Clandon & Horsley

Agent: Steve Ferrar Architect Applicant: Ferrar

Location: Land at Cuckoo Farm, Epsom Road, West Clandon, GUILDFORD GU4 7RJ

Proposal: Change of use of land from agriculture to a woodland burial ground to include new vehicular access to A246, parking area for 20 cars, single storey pavilion and toilet buildings, and landscaping to include a new woodland, lake and meadows

OPERATION STATEMENT

Wider vision for the site and its day-to-day management.

NATURAL BURIAL BACKGROUND

Natural burial involves burying bodies in a manner that allows them to recycle naturally and is an alternative to other contemporary burial methods. While it was once seen as a 'niche' part of the market, it is now recognised as an increasingly normal way of burying a loved one in an ecologically sound manner.

A woodland burial site, involves natural burials on open land where trees are planted on or near the grave, creating new woodland over time.

An initial 25-year management plan will be instigated for the new woodland to provide for managed growth, maintenance and expansion. Tree planting will comprise native species and will be managed to provide habitats for indigenous wildlife.

OPERATION

Burials may take place daily at 2 hourly intervals (10am / noon and 2pm) (all outside peak traffic hours). This would give a capacity of around twenty-one

burials per week, however, it is envisaged that there would be roughly seven burials per week in the first six months of operation.

Funeral corteges would arrive via Easthampstead Road and the site would have parking for a hearse and 30 cars, including 2 wheelchair accessible spaces. The reception building comprises an where mourners can gather for a remembrance service before moving to the grave.

Graves will not be marked with headstones, though they will be identified by discreet wooden markers. Once burial is complete the graves will be sown with wildflowers and grasses, though families may also choose to plant additional trees as a mark of remembrance.



A hand cart similar to the one above will be used to transport the coffin to the burial plot.

At least one member of staff would be present when a burial takes place and the car park would be open during the day all year round to allow access for relatives.

The long-term management of the site will provide new natural habitats and secure significant environmental improvements for the surrounding area.

KEY PLANNING ISSUES

PLANNING POLICY CONTEXT - PRINCIPLE OF DEVELOPMENT

The Council has no specific policies relating to natural burial grounds and national guidance is limited, with only paragraph 154 of the NPPF identifying

that cemeteries are appropriate uses within the Green Belt.

In this instance the site **is non-Green Belt** however it would be a nonsense not to apply the same criteria in countryside of a lower designation.

The National Planning Policy Framework (NPPF24) confirms:

Proposals affecting the Green Belt

*154. A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this include (b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, **cemeteries and burial grounds and allotments**; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it.*

The 'Natural Burial Grounds – Guidance for Operators' document, produced by the Ministry for Justice in 2009 states that opening a natural burial ground near to an urban area provides three benefits. It:

- provides additional burial space
- satisfies a growing demand for environmentally friendly funerals
- provides new amenity green space for the community.

The site lies within a countryside area of development constraint, where policy **CP11 - Proposals outside Development Limits (including countryside)** of the WBCS identifies that the countryside will proposals outside of development limits will not normally be permitted except where:

1) It contributes to diverse and sustainable rural enterprises within the borough, or in the case of other countryside based enterprises and activities, it contributes and/or promotes recreation in, and enjoyment of, the countryside.

The proposed natural burial ground responds to a burgeoning need for environmentally friendly funerals, while significantly enhancing the natural environment and providing new green space for the local community

It was considered that a natural / woodland burial site would be very unlikely to come forward within a built-up area and as such it is therefore considered realistic for this type of development to be located within the countryside.

The proposed use of the site as a natural burial ground is acceptable in principle, being an appropriate, low intensity countryside use, in a sustainable

location that will make significant enhancements to the rural character of the area and to natural habitats for protected species. The proposals are acceptable in principle and accord with local plan policies.

DESIGN AND LAYOUT

The only proposed built development on the site is a single storey reception building. The building shall comprise of materials of local design. The building and associated car park will be set back from the highway boundary to limit the visual impact from Easthampstead Road.

A comprehensive scheme of tree planting will ensure that even in winter months, the development will form a visually contained site, which will not have a significant impact on the rural character of the surrounding area.

Furthermore, the application proposals include additional boundary planting and, over the long term, the creation of a new native tree planting, which will constitute a significant enhancement to the rural character of the area.

The application is supported by a Landscape Appraisal, a Visual Impact Appraisal Report along with a Landscape Masterplan Strategy.

The degree of visual effects consequential to the proposals are assessed as 'negligible neutral' from those vantage points where it can be seen.

The proposed scheme is an enhancement to the rural character of the area and fully accords with Local Plan policies which requires a high standard of design for all new development.

LANDSCAPING

The proposal is landscape-led and has been considered in the context of the countryside in which the site is located. The proposed Natural Burial Site Landscape Masterplan Layout / Specification/Management Plan has been prepared by Harper Landscape Architecture LLP Landscape consultants.

The Landscape Masterplan Strategy sets out a comprehensive scheme of tree planting and landscaping for the proposals. This includes a proposed landscaped buffer strip around the remembrance service building and car park to soften and filter views. A comprehensive scheme of native tree planting is proposed throughout the site. Planting on the boundary of the site will ensure that long-term views are diffused. The scheme will also include a wildflower meadow and grassland comprising UK Provenance Native Species.

Furthermore, the green components of the landscaping will provide an

Environmental Infrastructure Framework for the whole site, maximising green linkages and enhancing biodiversity whilst reducing site runoff. The detailed landscaping strategy accords with the NPPF (2024) that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change including through the provision of green infrastructure.

The proposals will see a significant increase in native tree and wildflower planting across the site as a result of the proposals which maintain the rural character of the area while significantly enhancing natural habitat provision when compared to the existing fallow land.

In accordance with Local plan policy relating to Landscape design of new developments particular care will be taken in the provision, use and design of the hard and soft landscape design to ensure it is suitable for the site and form of development.

In terms of the change of use of the field to a natural burial ground, it will be developed at the same time with ground modelling and perimeter planting with semi-mature trees, light standard trees, smaller feathered trees, standards shrubs and whips. The areas contained by the new perimeter planting will be laid to wildflower meadow and will accommodate the internments.

The existing site has a native hedge landscaping to its boundaries. The proposed development will offer the opportunity to enhance soft landscaping as an integral part of the design.

The proposed single storey pavilion would be sited towards the front of the site. The main consideration is whether the proposed building would comprise essential facilities that would be reasonably required to facilitate the change of use of the land to a natural burial site.



The pavilion at c.18.5m x 5m would be used as a gathering or consulting space. The pavilion would comprise a concrete base with oak frame, externally glazed façade, sedum roof and a bit of vertical timber cladding to break things up. A roof overhang which will run around the perimeter of the building to act as a brise soleil and rain screen. This is very important, especially in an open environment and more so in a public building.

The footprint of the building (i.e. not including the decking and roof overhang) will measure just 93.3m². The building is to be built entirely of timber and glass with a sedum roof. It will provide space for approximately 30 people seated with a further 10 people standing together with toilets. The development has regard to and respects the scale, height and general proportions of other buildings within the surrounding area. A key feature of the area is the space which exists around the buildings within the area. Accordingly, this has allowed the development to retain a good visual and physical separation between itself and its neighbours and maintains the spacious character of the area.

The maximum height of the building is modest. The proposed design and materials will ensure that the building will blend into their rural surroundings.

The neighbouring properties will not be affected by the proposed development. The proposed development will not cause overshadowing or overlooking. The development will be moderate in scale.

The proposed development respects and works with the existing context to enhance the landscape character, setting and integrity of this rural site.

ECOLOGY

Given the extent of trees and hedges surrounding the site, it is considered likely that these provide habitats for several species of foraging and nesting birds.

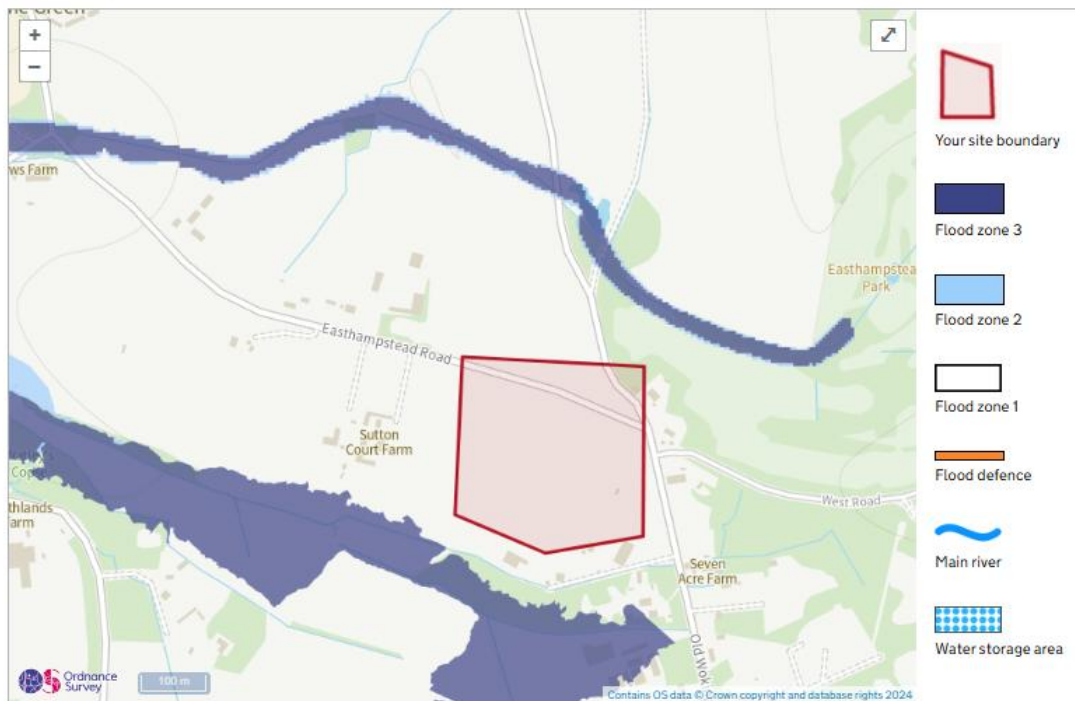
Subject to the inclusion of some general enhancements and the implementation of mitigation measures, it is concluded that the proposed development can proceed with minimal risk of impact on protected wildlife or local nature conservation, in accordance with local plan policies.

GROUND CONDITIONS, DRAINAGE AND FLOODING

Given that the site has historically only be used for grazing there is likely to be an absence of an identifiable existing source of contamination and with the low contaminating potential of natural burial grounds, it is considered that the severity of consequence on all potential receptors to be minor and the probability of a pollutant linkage unlikely, resulting in a very low risk rating for the site.

If necessary, the applicant is agreeable to a Ground Water Risk Assessment planning condition with details to be provided prior to any commencement. Similarly, the applicant is agreeable to drainage being dealt with by the discharge of prior to commencement planning conditions.

From the Environment Agency Flood Map it is clear that the site where the burial site is proposed is located **outside** any flood zone or area potentially subject to flooding.



RESIDENTIAL AMENITY

The site does not have any immediate residential neighbours; therefore the proposals are not considered to have a detrimental impact on residential amenity.

TRANSPORT

The application is supported by a Transport Statement, which considers the traffic and transportation issues relating to the proposed natural burial ground, including access arrangements, impact on the local highway network and the accessibility of the site in relation sustainable transport.

A turning head for refuse and service vehicles is included within the site and so that such vehicles can satisfactorily enter and exit in a forward gear.

The proposed parking arrangements, which comprise 30 parking bays (Including 2 disability spaces) for the parking of cars, motorcycles and/or bicycles, is in accordance with parking standards.

The Transport Statement concludes that it will not have an unacceptable

impact on the local highway network.

Access to the proposed development will be via an improved existing field gate access from Easthampstead Road. The traffic generated will remain compatible with the environmental character of the area and can be accommodated adequately on the surrounding road network.

General Access Principles - The design should facilitate the use, access and mobility around the proposed development by all users including those with disabilities. The proposal should support convenient and safe travel for all users in a balanced manner. Adequate provision would be retained for access by emergency services.

Access to the proposed development will be via a flat path/driveway to the public highway and associated footpaths with disabled access being provided via the front or rear of the property. Where appropriate all principal entrances will be provided with a level access threshold to conform to Building Regulations Part M and will be well illuminated. Disabled users and older/less mobile users are amply catered for with the open-plan living areas and rear patio on what is essentially a level plot. Downstairs WC facilities will be provided for older people and/or those with disabilities.

The design features consistent floor levels to facilitate unhindered access and simple communal circulation areas to facilitate easy movement around the dwelling. The open-plan areas provide generous manoeuvrability for wheelchair users. The driveway to the rear of the dwelling is spacious with ample area for manoeuvring and parking adjacent to the dwelling. Adequate provision has been made for parking for occupants and visitors without detracting from the character of the immediate area. Wheelchair access comfortably exceeds LTH requirements. Internal doorway dimensions conform to or exceed LTH standards.

Archaeological considerations

We note the following italicised comments in relation to the permission given under 203627 for Full application for the construction of stables to include a feed store and tack room and 20m x 60m outdoor sand school, following demolition of existing outbuildings and would similarly be agreeable to the suggested archaeology condition.

The site is located within an area of archaeological potential, as noted on the Berkshire Historic Environment Record. Cropmarks observed on aerial photography to the immediate north and to the west are likely to represent field systems and/or enclosures, and further associated features, as yet unrecorded, are therefore likely to survive in the vicinity.

Noting the requirement for drainage and underlayers for the sand school, as well as anticipated ground disturbance from the construction of the proposed new building, archaeological mitigation should be required, in line with national and local policy. This may take the form of a watching brief over areas of ground disturbance, or a preliminary set of trial trenches to test the potential and inform the need for further work. The archaeological work could reasonably take place post-determination, and therefore we recommend that if the application is approved, a condition is attached to the consent, as follows:

No development shall commence until a programme of archaeological work (which may comprise more than one phase) has been implemented in accordance with a written scheme of investigation, which has been submitted to and approved in writing by the local planning authority.

Reason: the site is within an area of archaeological potential, and further investigation is required to allow preservation and recording of any archaeological features or artefacts before disturbance by the development, in accordance with National Planning Policy Framework Section 16 (Conserving and Enhancing the Historic Environment), Core Strategy policy CP3 and Managing Development Delivery Local Plan policy TB25

Planning policy assessment

The proposals would suitably meet the key applicable planning policies below. Substantial weight can be given to unmet need, sustainable development and the positive planning balance against the assessment of the multitude of applicable planning policies.

Policy considerations:

It is considered that the application will need to be assessed against the following policies. The proposed development suitably meets the requirements of each of the policies. The **traffic light highlighting** and bold type face throughout the Planning Statement emphasises the suitability of the proposal against the material planning considerations as part of the planning balance exercise.

In terms of the need for an overall planning balance and the multitude of applicable considerations in this instance, it is respectfully and forcefully made out that the proposed development suitably meets and creates positive outcomes against the requirements of each of the policies.

National Planning Policy Framework 2024

The National Planning Policy Framework December 2024 is the most up to date national planning policy context of which all decision-making should have regard to and of which local policies should be consistent.

Achieving sustainable development

8. Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

- a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- c) an environmental objective – to protect and enhance our natural, built

and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

The presumption in favour of sustainable development

For decision-taking this means:

c) approving development proposals that accord with an up-to-date development plan without delay; or
d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

i the application of policies in this Framework that protect areas or assets of particular importance 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

Decision-making

39. Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.

Making effective use of land

124. Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.

125. Planning policies and decisions should:

a) encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains –

such as developments that would enable new habitat creation or improve public access to the countryside

Conserving and enhancing the natural environment

187. Planning policies and decisions 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;

c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;

d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs;

e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and

f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

Habitats and biodiversity

192. To protect **and enhance biodiversity and geodiversity**, plans should:

a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and

b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

Determining applications

48. Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. Decisions on applications should be made as quickly as possible, and within statutory timescales unless a longer period has been agreed by the applicant in writing.

Building a strong, competitive economy

85. Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.

86. Planning policies should:

a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to the national industrial strategy and any relevant Local Industrial Strategies and other local policies for economic development and regeneration.

Supporting a prosperous rural economy

88. Planning policies and decisions should enable:

a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed, new buildings;

b) the development and diversification of agricultural and other land-based rural businesses;

c) sustainable rural tourism and leisure developments which respect the character of the countryside; and

d) the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.

89. Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that

development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.

Promoting healthy and safe communities

98. To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:

- a) plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;**
- b) take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community;**
- c) guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs;
- d) ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community; and
- e) ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.**

Considering development proposals

116. 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.

Achieving well-designed places

131. The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.

135. Planning policies and decisions should ensure that developments:

- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;**

- b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
- d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
- e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
- f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

136. Trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible. Applicants and local planning authorities should work with highways officers and tree officers to ensure that the right trees are planted in the right places, and solutions are found that are compatible with highways standards and the needs of different users.

Ground conditions and pollution

200. Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed.

201. The focus of planning policies and decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). **Planning decisions should assume that these regimes will operate effectively. Equally, where a planning decision has been made on a particular development, the planning issues should not**

be revisited through the permitting regimes operated by pollution control authorities.

LOCAL PLANNING POLICY GUIDANCE

The **Wokingham Borough Managing Development Delivery Document** (Local Plan) – (WBMDD) Adopted 21 February 2014 and **Wokingham Borough Core Strategy** (WBCS) Adopted 29 January 2010) are the most up to date development plans for the district.

Wokingham Borough Managing Development Delivery Document
(WBMDDD) Local Plan)

Policy CC01 – Presumption in Favour of Sustainable Development

1. Planning applications that accord with the policies in the Development Plan for Wokingham Borough will be approved without delay, unless material considerations indicate otherwise.
2. Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:
 - a. Any adverse impacts of planning permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework (NPPF) taken as a whole; or
 - b. Specific policies in the National Planning Policy Framework indicate that development should be restricted.

Policy TB08: Open Space, sport and recreational facilities standards for residential development

1. Proposals for development that could lead to the loss of open space, sport or recreational facilities will need to be consistent with paragraph 74 of the National Planning Policy Framework.
2. Open space; indoor or outdoor play; sport and recreational facilities should be provided on-site.
- 3. Proposals for residential development will need to demonstrate how they meet the standards set out below.**

Type~	Standards (ha per 1,000 population)
Parks and public gardens	1.1
Natural/semi natural green space (excluding Country Parks*)	2.84
Amenity greenspace	0.98
Provision for children young people (Neighbourhood Equipped Areas of Play; Local Equipped Areas of Play; Local Areas of Play)	0.25
Civic Space	0.01
Outdoor sports facilities	1.66
Cemeteries/Burial Grounds#	14.4 plots per 1,000 population

Assumes a grave plot can accommodate 2.5 burials on average

MDD Policy	Related Core Strategy Policy	Proposed Indicator	Proposed Target	Comments
TB08: Open Space, sport and recreational facilities standards for residential development	CP3	The amount and range of open space provided relevant to the MDD requirements. Alternatively whether there is on site provision or financial contribution to open space.	Standards identified in the MDD.	Monitoring of consented applications requiring provision of open space. Maintain up to date open space audit to identify shortfalls. Main agencies will be the Borough Council, developers, and MDD.

Policy CC03: Green Infrastructure, Trees and Landscaping

- Green Routes and Green Route Enhancement Areas are defined on the Policies Map.
- Development proposals should demonstrate how they have considered and achieved the following criteria within scheme proposals:**
 - Provide new or protect and enhance the Borough's Green Infrastructure networks, including the need to mitigate potential impacts of new development**
 - Promote accessibility, linkages and permeability between and within existing green corridors including public rights of way such as footpaths, cycleways and bridleways**
 - Promote the integration of the scheme with any adjoining public open space or countryside**
 - Protect and retain existing trees, hedges and other landscape features**
 - Incorporate high quality, ideally, native planting and landscaping as an integral part of the scheme.**
- Development proposals which would result in the loss, fragmentation or

isolation of areas of green infrastructure will not be acceptable.

4. Development proposals within the River Valley areas shall improve or contribute toward:

- a) The establishment of a Loddon/ Blackwater riverside footpath and bridleway, as defined on the Policies Map, to accommodate dual use
- b) The establishment of a riverside footpath and cycleway to accommodate dual use along the Emm Brook

c) Opportunities for improvements to green infrastructure to help minimise flood risk

Policy TB21: Landscape Character

- 1. Proposals must demonstrate how they have addressed the requirements of the Council's Landscape Character Assessment, including the landscape quality; landscape strategy; landscape sensitivity and key issues.
- 2. Proposals shall retain or enhance the condition, character and features that contribute to the landscape.

Policy TB23: Biodiversity and Development

- 1. Sites of national or international importance are shown and sites of local importance are defined on the Policies Map.
- 2. Planning permission for development proposals will only be granted where they comply with policy CP7 – Biodiversity of the Core Strategy and also demonstrate how they:
 - a) **Provide opportunities, including through design, layout and landscaping to incorporate new biodiversity features or enhance existing**
 - b) **Provide appropriate buffer zones between development proposals and designated sites as well as habitats and species of principle importance for nature conservation**
 - c) **Ensure that all existing and new developments are ecologically permeable through the protection of existing and the provision of new continuous wildlife corridors, which shall be integrated and linked to the wider green infrastructure network.**

Policy CC04: Sustainable Design and Construction

Planning permission will only be granted for proposals that seek to deliver high quality sustainably designed and constructed developments by:

1. In respect of all new homes:

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

2. **All new non-residential proposals of more than 100 sq m gross non-residential floorspace shall at least:**

- a) **Achieve the necessary mandatory Building Research Establishment Assessment Method (BREEAM) requirements or any future national equivalent**

- b) Meet or exceed statutory requirements for water resource management.
- 3. All development, including conversions, alterations and extensions shall incorporate suitable waste management facilities, including on-site recycling.

Wokingham Borough Core Strategy (WBCS) policies

CP1 – Sustainable development

Planning permission will be granted for development proposals that:

- 1) Maintain or enhance the high quality of the environment;
- 2) Minimise the emission of pollutants into the wider environment;
- 3) Limit any adverse effects on water quality (including ground water);
- 4) Ensure the provision of adequate drainage;
- 5) Minimise the consumption and use of resources and provide for recycling;
- 6) Incorporate facilities for recycling of water and waste to help reduce per capita water consumption;
- 7) Avoid areas of best and most versatile agricultural land;
- 8) Avoid areas where pollution (including noise) may impact upon the amenity of future occupiers;
- 9) Avoid increasing (and where possible reduce) risks of or from all forms of flooding (including from groundwater);
- 10) Provide attractive, functional, accessible, safe, secure and adaptable schemes;
- 11) Demonstrate how they support opportunities for reducing the need to travel, particularly by private car in line with CP6; and
- 12) Contribute towards the goal of reaching zero-carbon developments⁴¹ as soon as possible by:
 - a) Including appropriate on-site renewable energy features; and
 - b) Minimising energy and water consumption by measures including the use of appropriate layout and orientation, building form, design and construction, and design to take account of microclimate so as to minimise carbon dioxide emissions through giving careful consideration to how all aspects of development form.

CP2 - Inclusive communities

To ensure that new development contributes to the provision of sustainable and inclusive communities (including the provision of community facilities) to meet long term needs, planning permission will be granted for proposals that address the requirements of:

- a) An ageing population, particularly in terms of housing, health and wellbeing**

CP3 - General Principles for development

Planning permission will be granted for proposals that:

- a) Are of an appropriate scale of activity, mass, layout, built form, height, materials and character to the area together with a high quality of design without detriment to the amenities of adjoining land users including open spaces or occupiers and their quality of life;
- b) Provide a functional, accessible, safe, secure and adaptable scheme;
- c) Have no detrimental impact upon important ecological, heritage, landscape (including river valleys) or geological features or water courses.
- d) Maintain or enhance the ability of the site to support fauna and flora including protected species;
- e) Use the full potential of the site and contribute to the support for suitable complementary facilities and uses;
- f) Contribute to a sense of place in the buildings and spaces themselves and in the way they integrate with their surroundings (especially existing dwellings) including the use of appropriate landscaping;
- g) Provide for a framework of open space in secure community use achieving at least 4.65 ha/1,000 population provision together with recreational/sporting facilities in addition to private amenity space;
- h) Contribute towards the provision of an appropriate sustainable network of community facilities;
- i) Do not lead to a net loss of dwellings and other residential accommodation or land; and
- j) Do not lead to a loss of community or recreational facilities/land or infrastructure unless suitable alternative provision is available.

The Wokingham Borough Managing Development Delivery Document ((WBMDDD) Local Plan) confirms:

3.33 Core Strategy Policy CP3 - General Principles of development requires development proposals to provide for a framework of open space.

3.34 New development can provide opportunities to provide, protect and enhance new and existing public open space **(including cemeteries/burial grounds)**, indoor and outdoor play, sport and recreational facilities either through on site measures or by contributing to off-site facilities.

CP4 - Infrastructure Requirements

Planning permission will not be granted unless appropriate arrangements for the improvement or provision of infrastructure, services, community and other

facilities required for the development taking account of the cumulative impact of schemes are agreed.

Arrangements for provision or improvement to the required standard will be secured by planning obligations or condition if appropriate.

CP6 - Managing Travel Demand

Planning permission will be granted for schemes that:

- a) Provide for sustainable forms of transport to allow choice;
- b) Are located where there are or will be at the time of development choices in the mode of transport available and which minimise the distance people need to travel;
- c) Improve the existing infrastructure network, including road, rail and public transport, enhance facilities for pedestrians and cyclists, including provision for those with reduced mobility, and other users;
- d) Provide appropriate vehicular parking, having regard to car ownership;
- e) Mitigate any adverse effects upon the local and strategic transport network that arise from the development proposed;
- f) Enhance road safety; and
- g) Do not cause highway problems or lead to traffic related environmental problems.

CP7 - Biodiversity

CP9 – Scale and location of development proposals

The scale of development proposals in Wokingham borough must reflect the existing or proposed levels of facilities and services at or in the location, together with their accessibility.

CP10 - Improvements to the Strategic Transport Network

CP11 - Proposals outside Development Limits (including countryside)

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 except where:

- 1) **It contributes to diverse and sustainable rural enterprises within the borough, or in the case of other countryside based enterprises and activities, it contributes and/or promotes recreation in, and enjoyment of, the countryside;** and
- 2) It does not lead to excessive encroachment or expansion of development away from the original buildings; and

3) It is contained within suitably located buildings which are appropriate for conversion, **or in the case of replacement buildings would bring about environmental improvement;** or

4) In the case of residential extensions, does not result in inappropriate increases in the scale, form or footprint of the original building;

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

i) Bring about environmental improvements; or

ii) Not result in inappropriate increases in the scale, form or footprint of the original building.

6) Essential community facilities cannot be accommodated within development limits or through the re-use/replacement of an existing building; 7) Affordable housing on rural exception sites in line with CP9.

Interim statement on Climate Change / Sustainable design

Sustainability, Energy Efficiency and Renewable Energy

In accordance with Local plan policy relating to Sustainable Construction, Renewable Energy and Energy Conservation the proposed development will minimise energy use through its design, layout and orientation.

Rainwater Harvesting - Rainwater from the roof will be collected and stored for use in the garden areas. Water consumption will also be further reduced with the installation of dual flush cisterns and aerated taps.

Timber - All timber to be used is to be sourced from suppliers affiliated to certified schemes such as Forest Stewardship Council, Canadian Standards Association, Sustainable Forest Initiative or the Programme for the Endorsement of Forest Certification etc.

Lighting - Use of compact fluorescent, low energy / LED lighting throughout the proposed development in particular within the circulation spaces with PIR detectors where appropriate to turn lights off automatically when not occupied.

Windows - The Windows will be installed with double glazed low E coated sealed units.

Access and parking:

The proposed access design improves the existing field gate highway access point. The traffic generated will remain compatible with the environmental character of the area and can be accommodated adequately on the surrounding road network. Good visibility is available in each direction from existing access.

The proposed parking area will also be set amongst the new tree planting which will screen the parking area from the road and wider surroundings. The proposed surface materials for the car park are to comprise a mix of loose aggregate and wild flower seed mix. The size of the proposed parking area with space for 30 cars, is appropriate for the size of the site and the anticipated number of people who will be attending the building at one time.

General Access Principles - The design should facilitate the use, access and mobility around the building by all users including those with disabilities. The design should integrate with the existing road and footpath infrastructure to provide ease of movement within the local community infrastructure. The proposal should support convenient and safe travel for all users in a balanced manner. Adequate provision would be retained for access by emergency services.

Access to the building will be via a flat path/driveway to the public highway and associated footpaths with disabled access being provided via the front or rear of the property. Where appropriate all principal entrances will be provided with a level access threshold to conform to Building Regulations Part M and will be well illuminated. Disabled users and older/less mobile users are amply catered for with the open-plan living areas and rear patio on what is essentially a level plot. Downstairs WC facilities will be provided for older people and/or those with disabilities.

The design features consistent floor levels to facilitate unhindered access and simple communal circulation areas to facilitate easy movement around the building. The open-plan areas provide generous manoeuvrability for wheelchair users. The driveway to the rear of the dwelling is spacious with ample area for manoeuvring and parking adjacent to the dwelling. Adequate provision has been made for parking for occupants and visitors without detracting from the character of the immediate area. Wheelchair access comfortably exceeds LTH requirements. Internal doorway dimensions conform to or exceed LTH standards.

Conclusion:

The proposals are brought forward to provide a facility that will meet **an increasing demand for environmentally friendly burials, while at the same time creating new indigenous tree planting and wildflower meadows**. The proposal will bring forward new native species across the site, providing significant ecological enhancements and new habitats for protected species. Local people would be welcome to enjoy what will become a valued local natural resource.

Although the site is identified as being within a Countryside Area of Development Constraint, the proposals are **acceptable in land use terms** and appropriate development, which enhances the rural character of the area.

The size and topography of the site allows for a natural burial ground of appropriate scale and appearance. The scheme is sensitively designed and the comprehensive set of landscaping proposals will result in a secluded yet open site which ensures that there is not a significant impact on the rural character of the area. The proposals, therefore, accord with the requirements of local plan policies.

The proposals meet the Council's detailed guidance in terms of development and parking standards.

It is considered that the application proposals pass the tests set out in Section 38 of the Planning and Compulsory Purchase Act 2005, and that planning permission should be granted accordingly.

In terms of the need for an overall planning balance, particularly given the multitude of applicable considerations in this instance, it is respectfully and forcefully made out that the proposed development suitably meets and creates positive outcomes against the requirements of each of the policies.

Most of the site will either comprise tree planting or open meadow which will retain the openness of the site and enhance its visual amenity. The proposed building and parking area are essential facilities for the use of the site as a burial ground and will take up a minimal part of the site. In addition, the building and parking area, due to their scale, design and materials, together with the proposed tree planting around them, will be of limited visibility from outside of the site, particularly when the trees have matured. As such, it is concluded that the proposal will not have an adverse impact on the openness or visual amenity of the countryside. A condition is offered restricting the use of the proposed buildings to uses associated with the natural burial ground only. This is to ensure there is no intensification in the use of the site and to protect the openness of the countryside.

The proposed development has been given **detailed consideration** so that it will enhance and reflect its location both in context, scale and design and will not have a detrimental effect on the area. The proposal, together with the other elements of the scheme, amount to significant improvements.

The associated uses of land surrounding the proposed development would not materially harm the character and amenities of the area.

The proposed use and the form, bulk and general design of the proposed development is in keeping with its surroundings. All works will be carried out in a manner appropriate to the character of the setting and have no adverse impact on its surroundings; the proposal will retain and enhance the intrinsic features and architectural integrity of the existing context.

The surrounding area is predominantly rural in character. The landscaping proposals will ensure that the use of the land will integrate with the character of surroundings in an acceptable manner. The proposal would result in a low-key development of the site that will be sympathetic to the rural character of the surroundings.

The proposed use and the form, bulk and general design of the proposed development is in keeping with its surroundings. All works will be carried out in a manner appropriate to the character of the setting and have no adverse impact on its surroundings; the proposal will retain and enhance the intrinsic features and architectural integrity of the existing context.

It is concluded that the proposed change of use of the land to a natural burial ground will constitute **appropriate development** within the countryside and will preserve its openness. The proposed building and parking area are essential facilities for the use of the site as a burial ground and will take up a minimal part of the site. In addition, the building and parking area, due to their modest scale, design and materials, together with the proposed extensive tree planting and landscaping proposals around the buildings and across the site will not have an adverse impact on the openness or visual amenity of the countryside.

The landscaping proposals will ensure that proposed development and use of the land will integrate into the landscape in an acceptable manner and will ensure that the proposed use of the land will not harm the existing rural landscape character of the site or wider surroundings. The future maintenance and management of the landscape and tree planting is to be secured by condition. In addition, due to the modest scale, siting, sympathetic design and materials of the proposed buildings and the sympathetic landscaping proposals, there will be no adverse impact on the character of the area, setting of the adjacent conservation area or amenities enjoyed by neighbouring properties.

The proposed development creates the opportunity to create a significant

planning betterment that would enhance both the context of the site and the character of the area.

The proposal is for a form of development that would not normally be considered appropriate within existing traditional development and therefore, by default, not within existing settlement boundaries.

This proposal will contribute positively and appropriately to the environment and biodiversity in a well landscaped location, that will place no additional burden on local services. There are no technical or other reasons that would give rise to a reason for refusal.

Thank you in advance of your balanced consideration of the proposed application.

Please maintain a dialogue with myself and the applicants if you have any questions, concerns or matters that require further elaboration.

APPENDIX 1. Officer report **approval** included as a background document at

Appl No: 11/P/01768 8/13 week deadline: 05/01/2012

Appl Type: Full Application

Parish: West Clandon Ward: Clandon & Horsley

Agent: Steve Ferrar Architect Applicant: Ferrar

*Location: Land at Cuckoo Farm, Epsom Road, West Clandon, GUILDFORD
GU4 7RJ*

Proposal: Change of use of land from agriculture to a woodland burial ground to include new vehicular access to A246, parking area for 20 cars, single storey pavilion and toilet buildings, and landscaping to include a new woodland, lake and meadows.