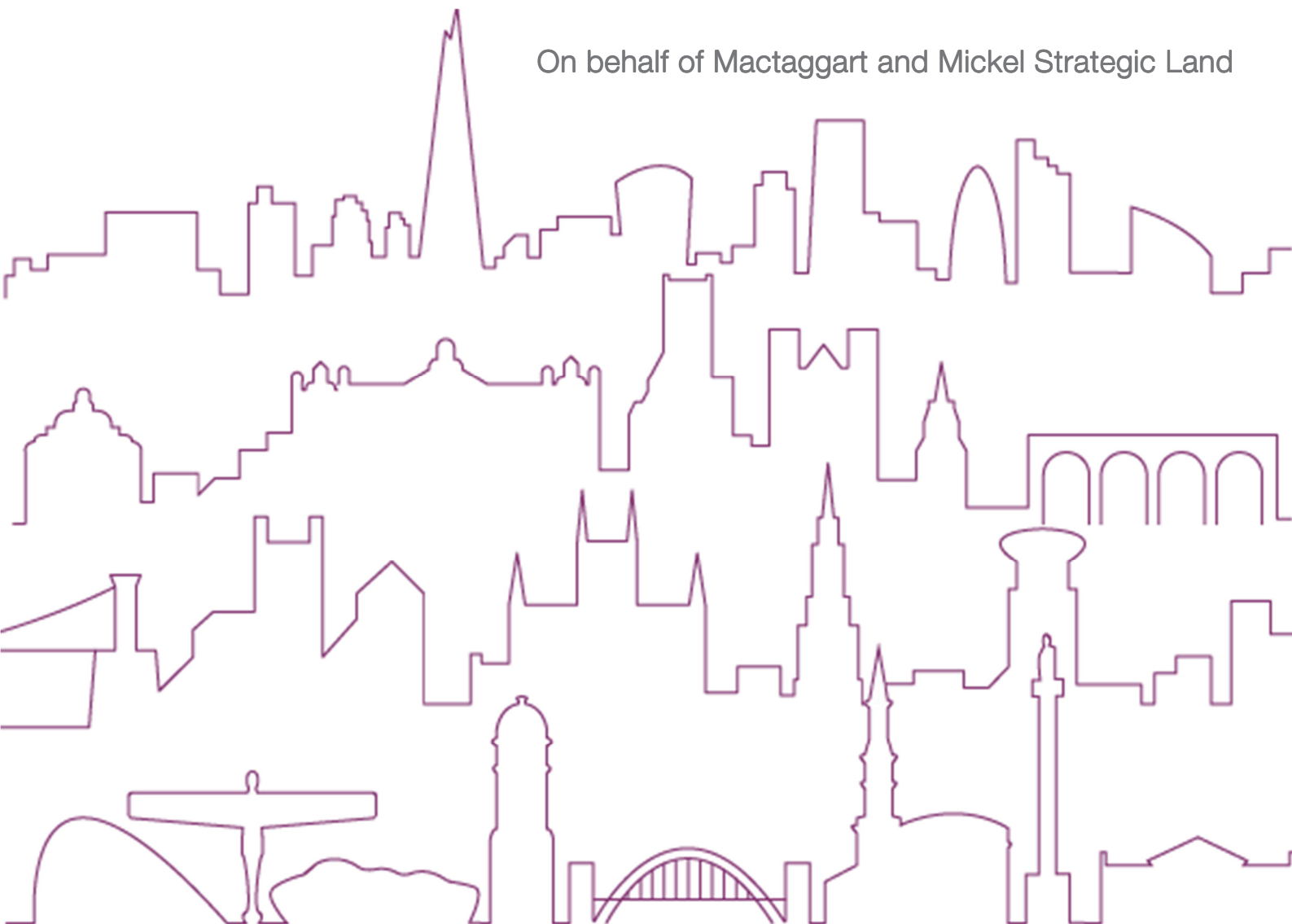


MAC MIC
GROUP

Statement of Common Ground

Appeal against refusal of planning
application ref: 242067 which relates Land
Between Lodge Road and Tape Lane,
Hurst, RG10 0EG

On behalf of Mactaggart and Mickel Strategic Land



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Report Reference:
7169

1. Introduction

- 1.1. This Statement of Common Ground ('SoCG') has been prepared by Planning Potential Ltd in support of an appeal against the refusal of Wokingham Borough Council ('WBC') of an application for planning permission (ref: 242067) by Mactaggart and Mickel Strategic Land ('Mac Mic' or 'the Appellant'). Both the Appellant and the Council have agreed the matters contained within it.
- 1.2. This SoCG supports an Appeal for outline planning permission for *"the proposed erection of up to 99 no. dwellings, green infrastructure, open space, pedestrian and cycle links, recreational facilities and other associated infrastructure and access points on Lodge Road and Tape Lane with required improvements"*. (All matters reserved except for means of access.). The proposals were refused, by Wokingham Borough Council, under delegated powers, on 29th November 2024.
- 1.3. Eleven reasons for refusal were in the decision notice and are set out below. The Decision Notice is found at Appendix 1 and the associated Officer's Report is Appendix 2.

Reason for Refusal 1

- The proposal results in an unsustainable pattern of development by reason of the creation of a new unplanned large housing estate on a greenfield site in the countryside outside of settlement limits. It would be significantly out of scale with neighbouring small village of Hurst and the level of existing infrastructure within the village. The development is contrary to the spatial objectives of the development plan and policies CP1, CP2, CP3, CP6, CP9 and CP11 of the Core Strategy, CC01, CC02, CC03 and TB21 of the MDD Local Plan, the Borough Design Guide SPD and section 2, 4, 8, 9, 12 and 15 of the NPPF.

Reason for Refusal 2

- The application results in the loss of an area of Best and Most Versatile agricultural land contrary to Core Strategy policy CP1 and section 15 of the NPPF.

Reason for Refusal 3

- The proposed development will have a detrimental impact on the landscape and the character and appearance of the area by reason of the quantum, scale, parameters and location of the development. It would result in the loss of characteristic landscape features and erode of the separation between existing villages and their rural setting. The development is contrary to policies CP1, CP3, CP9 and CP11 of the Core Strategy, CC01, CC02, CC03 and TB21 of the MDD Local Plan, the Borough Design Guide SPD and section 12 & 15 of the NPPF.

Reason for Refusal 4

- The application site is within an unsustainable location where residents would be reliant on private vehicles for basic day-to-day needs, by reason of the countryside location outside of settlement limits, distances to facilities and services, limited public transport links and poor quality of the walking/cycling environment, contrary to policies CP1, CP2, CP3, CP6 and CP11 of the Core Strategy, CC01 and CC02 of the MDD Local Plan, the Borough Design Guide SPD and section 8 & 9 of the NPPF.

Reason for Refusal 5

- In the absence of a satisfactory Flood Risk Assessment and the Environment Agency objection, the proposed development has failed to demonstrate it would have an acceptable flooding and drainage impact contrary to Core Strategy policy CP1 and CP3, MDD Local Plan Policy CC09 and CC10 and Section 14 of the NPPF.

Reason for Refusal 6

- By virtue of a lack of accurate information, an assessment date for baseline biodiversity value cannot be agreed. Therefore an assessment of how 10 percent biodiversity net gain will be achieved is not possible and as such, if granted planning permission, there is no guarantee if 10 percent biodiversity net gain will be achieved, hence would be contrary to Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021).

Reason for Refusal 7

- The application has failed to demonstrate the proposed development will have an acceptable impact on ecology and biodiversity by reason of the impact on protected species, wildlife and habitats, contrary to policy CP1, CP3 and CP7 of the Core Strategy, CC01 and TB23 of the MDD Local Plan and section 15 of the NPPF.

Reason for Refusal 8

- In the absence of a completed legal agreement, the proposal fails to secure opportunities for training, apprenticeships and other vocational initiatives to develop local employability skills contrary to MDD policy Local Plan TB12.

Reason for Refusal 9

- In the absence of a completed Legal Agreement, the scheme fails to make adequate provision for affordable housing, contrary to policy CP5 of the Core Strategy and section 6 of the NPPF.

Reason for Refusal 10

- In the absence of a completed Legal Agreement, the development fails to secure a schedule off-site highway works for pedestrian and sustainable travel infrastructure and the management/adoption of internal estate roads and public open spaces, contrary to Core Strategy policy CP1, CP3, CP4 and CP6 and MDD Local Plan policy CC03 and TB08 and sections 4, 8, 9 and 12 of the NPPF

Reason for Refusal 11

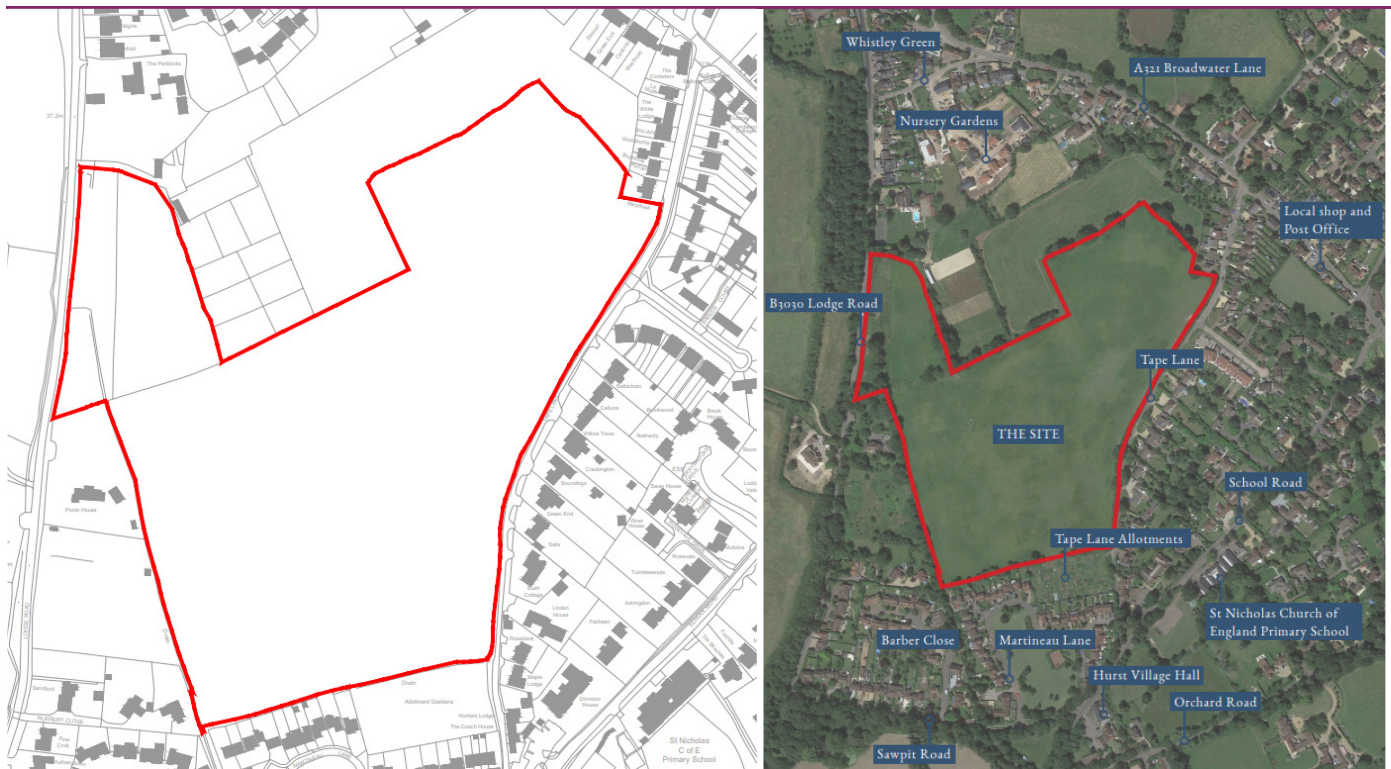
- In the absence of a completed Legal Agreement, the proposed development fails to make adequate contributions to sport and recreational facilities, contrary to MDD Local Plan policy TB08, Core Strategy policy CP4 and Sections 4 and 8 of the NPPF.

2. Appeal Site Location and Description

Site Description

- 2.1. The Site comprises 10.68Ha of agricultural fields located between Lodge Road to the west, and Tape Lane to the east, in the village of Hurst.
- 2.2. The Site is largely flat and is used for the grazing of farm animals, predominantly horses. The site is well bounded on all sides by hedgerows and trees, which also feature on other areas of the Site. There is a band of mature trees, which run from east to west on the northern boundary of the site. There is also an area of mature trees at the west of the site. Six English oak trees are considered to meet the criteria of a Veteran tree, located sporadically on the Site boundary.
- 2.3. The Site comprises private land, and no Public Rights of Way (PRoW) feature on the Site. There are existing access points along both Lodge Road and Tape Lane via gates associated with the existing and previous farming uses.
- 2.4. The Site is designated as Countryside and outside of settlement boundaries.
- 2.5. The Site is located in Flood Zone 1, low risk of flooding, according to the Environment Agency mapping tool.
- 2.6. There are no Listed buildings on the Site and it is not located within a conservation area.
- 2.7. The Site is located in an area for the following designations.
 - Area of Search for Sand and Gravel
 - Mineral Safeguarding Area
 - Groundwater Consultation Zone
 - Great Crested Newt Impact Risk Zone
 - Sites of Special Scientific Interest Impact Risk Zone

Figure 2.1 Site Location



Source: Mosaic

Surrounding Area

- 2.8. The Site is located in the village of Hurst, which is located 1.7miles south of Twyford and 1.6miles north of Winnersh. The village of Hurst surrounds the Site in a 'reverse C' shape, to the north, east and south.
- 2.9. Residential areas directly border Tape Lane at the east of the Site, predominantly comprising two storey semi-detached dwellings. Rear gardens and Tape Lane Allotments directly abut the south of the Site.
- 2.10. Further residential properties are found at the north of the Site, including the more recent Nursery Gardens development.
- 2.11. To the west of the Site, beyond Lodge Road sits further fields and wetlands – the open countryside.
- 2.12. The Site's location, a 10-minute cycle from Winnersh train station, and an 8-minute cycle from Twyford train station, demonstrate that it is a sustainable one. Twyford station is on the recently introduced Elizabeth Line, providing regular access into London, and Reading. Twyford and Winnersh are both also served by Great Western services, providing quick and regular access to London and surrounding areas.
- 2.13. Twyford and Winnersh further provide a wide range of services and facilities, which serve Hurst. The village of Hurst itself contains essential facilities including a Post Office, Village Shop, Village Hall, Sports Clubs, Primary School, and Pubs.
- 2.14. Road access to the Site is also good, providing quick routes to the M4, whilst the Site is located on the A321, connecting Twyford and Wokingham.
- 2.15. Although there are no Listed buildings on the Site, there are several Grade II Listed assets found across the village of Hurst, particularly to the north of the Site. There is a row of Grade II Listed houses along Broadwater Lane to the north of the Site, the closest approximately 60m. However, all listed buildings are screened from the Site through existing trees and therefore are not visible to or from the Site.

3. Planning History

3.1. The Site has recent planning history, beyond this appeal scheme, which is set out below:

- 1986 appeal – no online records available.
- F/1999/70600 | Proposed Erection of Building For Use As Farm Shop And Equipment Store And Siting Of One Mobile Home. Refused December 1999
- F/2001/3149 | Proposed erection of an agricultural building incorporating farm shop, parking and access. Refused and Appeal dismissed September 2002
- CLE/2004/1099 | Application for certificate of existing lawful use of field for keeping of horses. Approved April 2004
- F/2007/2154 | Proposed erection of stables and barn to form equine treatment centre with menage, access and horse walkers. Storage building for tree nursery. Refused October 2007
- F/2008/1748 | Proposed siting of a mobile home. Refused and Appeal dismissed February 2009.
- F/2008/1017 | Proposed erection of stables and barn to form equine treatment centre with menage, access and horse walkers. Refused and Appeal dismissed February 2009.
- 212986 | Screening Opinion application for an Environmental Impact Assessment for a proposed development of up to 300 homes, open space, pedestrian and cycle links and other associated infrastructure and primary vehicular access via the existing Lodge Road gated access with required improvements. Land East of Lodge Road, Hurst. No EIA Required 21/09/21
- 220458 | Outline application for the proposed development of approximately 200 homes, open space, pedestrian and cycle links, recreational facilities (Use Class E) and other associated infrastructure and primary vehicular access via the existing Lodge Road gated access with required improvements (all matters reserved except for access). Land East of Lodge Road, Hurst. Refused 22/06/2022
- APP/X0360/W/22/3309202 | Outline application for the proposed development of approximately 200 homes, open space, pedestrian and cycle links, recreational facilities (Use Class E) and other associated infrastructure and primary vehicular access via the existing Lodge Road gated access with required improvements (all matters reserved except for access). Land East of Lodge Road, Hurst. Dismissed March 2023.
- 242067 | Outline application for the proposed erection of up to 99 no. dwellings, green infrastructure, open space, pedestrian and cycle links, recreational facilities and other associated infrastructure and access points on Lodge Road and Tape Lane with required improvements. (All matters reserved except for means of access.) Refused 29/11/2024 (subject of this appeal)

3.2. There is a historic appeal related to the Site. The Appeal, in 1986, relates to a proposed outline application for a residential development, including accommodation for the elderly and shops and medical centre. The Appeal was dismissed, however it is judged that due to the significant period of time that has passed, the Appeal is not relevant to the current time, as the national and local policy position has changed considerably.

Local Planning History

3.3. There have been several planning applications of note within Hurst, including the following.

- 153431 | Full application for the proposed erection of 12no dwellings, garages and creation of new vehicular access off lodge road. Land at Lodge Road, Hurst. Refused May 2016
- 172894 | Full application for the proposed erection of 5 no. new dwellings and garages with creation of a new vehicular and pedestrian access to Lodge Road and footway provision. Land at Lodge Road, Hurst. Refused December 2017
- 162219 | Full planning application for the proposed erection of 16no. dwellings with garages and parking spaces with new access to Whistley Green following demolition of derelict greenhouses. Valley Nurseries, Whistley Green. Refused December 2016, Appeal allowed June 2017.

- 230074 | Land adjacent to School Road and Orchard Road, Hurst, Reading Proposal: Outline planning application for the proposed erection of 23 dwellings with associated access and 15 carparking spaces for the local Primary school. Access only to be considered (with Appearance, Landscaping, Layout and Scale to be reserved). Land adjacent to School Road and Orchard Road, Hurst. Refused February 2024. Allowed after Appeal (Hearing) October 2024.
- 240583 | Outline application for the proposed erection of 9No dwellings and associated access, (with Landscaping, Layout, scale and Appearance reserved) and only Access to be considered. Revised plans and information received to provide biodiversity net gain, details of bat surveys, landscape information, highways information, road safety audit, pedestrian improvements inside and outside of the site, street scene visuals and sustainability measures. Land north-west of Hogmoor Lane, Hurst. Refused 29th November 2024.

4. The Appeal Scheme

4.1. This appeal seeks planning permission for:

“Outline application for up to 99 new homes, green infrastructure, open space, pedestrian and cycle links, recreational facilities and other associated infrastructure and access points on Lodge Road and Tape Lane with required improvements (all matters reserved except access).”

- 4.2. The proposed development will be subject to detailed design and technical work to be considered later, at Reserved Matters stage, following the grant of outline planning permission. The appeal is supported by a Parameter Plan (ref: 002 C), Illustrative Masterplan (ref: 003-01B) and highways / access plans (ref: ITB19328-GA-001 Rev D and ITB19328-GA-003 Rev C).
- 4.3. The residential provision will comprise up to 99 new homes, which will provide a mix of tenure, which responds to planning policy and local need. The homes will be provided as houses, predominantly 2-storey. The development will provide an on-site provision of 50% affordable housing, exceeding local policy requirements and the mix will also respond to local need and planning policy.
- 4.4. A significant proportion of the Site, 62%, will be kept free from development and retained as open space and enhanced with green infrastructure features.
- 4.5. The proposed development consists of two distinct clusters of residential buildings at the northern and southern ends of the site, with the central area remaining open and undeveloped. The new central ‘common’ will feature a species rich meadow, enhancing the landscape for enjoyment and access by both new and existing residents. The majority of the site would be transformed into publicly accessible open space and allotments, and existing trees and hedgerow will be enhanced. The site will secure in excess of 10% biodiversity Net Gain on site / off site.
- 4.6. Vehicular access will be provided onto Lodge Road, of which the arrangements mirror those presented as part of the earlier Appeal¹ scheme, which were considered acceptable to WBC. A 3.7m wide emergency vehicle / bus only access is also proposed onto Tape Lane at the north-eastern extent of the site.
- 4.7. Pedestrian access is proposed onto Lodge Road, through the delivery of the proposed site access junction which comprises a new footway that will tie into the existing provision along the eastern side of Lodge Road. Additionally, two points of pedestrian/cycle access onto Tape Lane are proposed at the north-eastern and south-eastern boundaries respectively. Parking is to be provided in line with WBC policy standards.
- 4.8. A comprehensive suite of pedestrian infrastructure improvements is proposed to be delivered, to ensure there are improved opportunities for both existing and future residents of Hurst to access local facilities and services on foot. These proposals include footway improvements along: Lodge Road, leading north from the proposed site access; at the southern extent of Tape Lane and along School Road and along the northern extent of Tape Lane and along Broadwater Lane towards Hurst Shop and post office.
- 4.9. The development proposals will deliver a comprehensive cycle improvement scheme between Hurst and Twyford Railway Station. The route improvements will cover an approximate 2km length of Lodge Road, Broadwater Lane and Hurst Road between the application site and Twyford Railway Station. The proposals include the delivery of a critical cycle connection to Twyford in line with the WBC LCWIP Proposal.
- 4.10. In conjunction with the improvements to cycle infrastructure along Lodge Road, Broadwater Lane and Hurst Road, the scheme proposes substantial improvements to the existing cycle and bus infrastructure at Twyford Railway Station by: Introducing improved covered cycle parking facilities within the vicinity of the station; Relocating the existing bus stop layby adjacent to the station and providing a bus shelter to create an improved interchange; Providing a new bus shelter for westbound services towards Hurst from Twyford and Providing an improved pedestrian interface at the station, through the delivery of footway improvements along the railway station frontage.
- 4.11. The Appeal Proposals are also supported by a long term commitment to deliver improved bus connections between the Appeal Site and Twyford, providing regular and attractive access to Twyford Station, the centre of Twyford and its services and the Piggot School. This will ensure long term good levels of public transport provision and provide access to the rail network.

¹ APP/X0360/W/22/3309202 Appeal Decision

5. Plans

5.1. Accordingly, for the avoidance of doubt, the appeal is to be determined in accordance with the following drawings and documents, which were submitted as part of the planning application:

- Planning Statement (Planning Potential)
- Site Location Plan – 004 (Mosaic)
- Parameters Plan – 002 Rev C (Mosaic)
- Illustrative Masterplan – 003-01B (Mosaic)
- Design and Access Statement (Mosaic)
- Character Area Statement (Mosaic)
- Transport Assessment (i-Transport)
- Framework Travel Plan (i-Transport)
- Arboricultural Assessment (Tyler Grange)
- Ecology Assessment (Tyler Grange)
- Biodiversity Net Gain Matrix (Tyler Grange)
- Drainage Strategy (SLR)
- Flood Risk Assessment and Drainage Plan (SLR)
- Landscape Visual Impact Assessment (Pegasus)
- Illustrative Landscape Strategy (Pegasus)
- Statement of Community Involvement (Connect)
- Contamination Report (Hydrock)
- Sustainability and Energy Statement (Blue Sky Unlimited)
- Revised Ecological Impact Assessment (Tyler Grange)
- Revised Biodiversity Net Gain Matrix (Tyler Grange)
- Revised Preliminary Tree Retention and Removal Plan (Tyler Grange)
- Bat Activity Report (Tyler Grange)
- Revised Framework Travel Plan (i-Transport)
- Transport Assessment Addendum (i-Transport)
- Land East of Lodge Road, Hurst Minerals Safeguarding Assessment (Hydrock)
- Sand and Gravel Mineral Potential – Letter (Wardrop Minerals Management Limited)

5.2. For the avoidance of doubt the documents we are seeking approval for are as follows:

- Site Location Plan – 004 (Mosaic)
- Parameters Plan – 002 Rev C (Mosaic)

- Transport Assessment (i-Transport)
- Arboricultural Assessment (Tyler Grange)
- Ecology Assessment (Tyler Grange)
- Biodiversity Net Gain Matrix (Tyler Grange)
- Drainage Strategy (SLR)
- Flood Risk Assessment and Drainage Plan (SLR)
- Landscape Visual Impact Assessment (Pegasus)
- Contamination Report (Hydrock)
- Sustainability and Energy Statement (Blue Sky Unlimited)
- Revised Ecological Impact Assessment (Tyler Grange)
- Revised Biodiversity Net Gain Matrix (Tyler Grange)
- Revised Preliminary Tree Retention and Removal Plan (Tyler Grange)
- Bat Activity Report (Tyler Grange)
- Revised Framework Travel Plan (i-Transport)
- Transport Assessment Addendum (i-Transport)
- Land East of Lodge Road, Hurst Minerals Safeguarding Assessment (Hydrock)
- Sand and Gravel Mineral Potential – Letter (Wardrop Minerals Management Limited)

5.3. All other documents are illustrative or for information only purposes.

6. Planning Policy

- 6.1. The planning system is plan-led. Planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. The Framework is a material consideration in planning decisions. It also provides guidance on how to draw up Development Plans and policies.

National Planning Policy Framework

- 6.2. A revised NPPF was published on the 12th of December 2024 after a consultation over the summer of 2024 after Labour were voted into power in July. The revised NPPF makes significant changes to the Framework in a move towards boosting housing delivery.

Development Plan Policies

- 6.3. WBC's Development Plan documents are comprised of the following:

- Core Strategy (2010)
- Managing Development Delivery Plan (2014)
- Joint Minerals and Waste Plan (2023)

- 6.4. The relevant Supplementary Planning Documents (SPDs) are:

- Infrastructure Delivery and Contributions SPD
- Sustainable Design and Construction SPD
- Affordable Housing SPD
- A Design for Hurst SPD

- 6.5. The adopted plan is out of date. Paragraph 34 of the NPPF requires LPA's to review their Local Plan at least once every five years. In the previous Appeal decision (ref: APP/X0360/W/22/3309202), the Inspector recognises, at Paragraph 28, that the policies and settlement boundaries must be regarded as being out-of-date and as such the presumption is engaged.

- 6.6. The Reasons for Refusal refer to the following policies:

NPPF (2023)

- Section 2
- Section 4
- Section 6
- Section 8
- Section 9
- Section 12
- Section 14
- Section 15

Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021)

Borough Design Guide SPD

Core Strategy

- CP1 – Sustainable Development
- CP2 – Inclusive Communities
- CP3 – General Principles of Development
- CP4 – Infrastructure Requirements
- CP5 – Housing Mix, Density and Affordability
- CP6 – Managing Travel Demands
- CP7 – Biodiversity
- CP9 – Scale and Location of Development Proposals
- CP11 – Proposals outside Development Limits (including countryside)

Development Management Delivery Document

- CC01 – Presumption in favour of Sustainable Development
- CC02 – Development Limits
- CC03 – Green Infrastructure, Trees and Landscaping
- CC09 – Development and Flood Risk
- CC10 – Sustainable Drainage
- TB08 – Open space, sport and recreation facilities standards for residential development
- TB12 – Employment Skills Plan
- TB21 – Landscape Character
- TB23 – Biodiversity and Development

Emerging Local Plan

- 6.7. WBC have commenced the process of working on a New Local Plan. If found sound, the New Local Plan will ultimately replace the current Core Strategy and Managing Development Delivery Plan.
- 6.8. Wokingham Borough Council's Emerging Local Plan has now been submitted for Examination (28th February 2025). Two Local Plan Inspectors have been appointed; T Hatfield and M Philpott. At the point of writing, no hearing sessions have been arranged.
- 6.9. According to the latest Local Development Scheme the Council anticipate Stage 1 Hearings in June 2025 (adjusted to account for a 2-month delay in submission). Stage 2 Hearings would then be anticipated for November 2025 (adjusted accordingly). The Council anticipate that the Local Plan will then be adopted by July 2026 (adjusted).
- 6.10. Within the previous Appeal decision for the site (APP/X0360/W/22/3309202), the Inspector gave significant weight to the work that WBC were undertaking in terms of the progress of the New Local Plan and meeting the 5-year housing land supply requirement. However, with very limited progress since this time, it can be seen that significant weight can no longer be attributed to this, as is confirmed by appeal decision Ref: APP/X0360/W/24/3350170 – Twyford, whereby as of February 2025, only limited weight was afforded to the emerging policy position.
- 6.11. Should the emerging Local Plan be adopted (timetabled for July 2026), it will be subject to an immediate review under the latest NPPF (paragraph 236), given the extent of the shortfall in planned housing delivery against the local housing need, rendering those policies controlling the delivery of housing still out of date, until said review has taken place. A Local Plan review is unlikely to conclude until at least Summer 2028 and as such, until such time as Local Plan review has taken place the emerging Local Plan carries limited weight.

Policies weighting

- 6.12. Below we set out the policies referred to and attribute weight to them:

Policy	Weight
NPPF 2023	Full weight where policies are unchanged in the current version (albeit the adopted policy is now NPPF 2024)
CP1 – Sustainable Development	Full weight.
CP2 – Inclusive Communities	Full weight.
CP3 – General Principles of Development	Very limited weight – policy controls the provision of housing and as such is out-of-date.
CP4 – Infrastructure Requirements	Limited weight – indirectly impacts the delivery of housing and as such is out-of-date.
CP5 – Housing Mix, Density and Affordability	Very limited weight – policy controls the provision of housing and as such is out-of-date.
CP6 – Managing Travel Demands	Limited weight – indirectly impacts the delivery of housing and as such is out-of-date.
CP7 – Biodiversity	Limited weight due to more up-to-date national guidance being available.

CP9 – Scale and Location of Development Proposals	Very limited weight – policy controls the provision of housing and as such is out-of-date.
CP11 – Proposals outside Development Limits (including countryside)	Very limited weight – policy controls the provision of housing and as such is out-of-date.
CC01 – Presumption in favour of Sustainable Development	Full weight.
CC02 – Development Limits	Very limited weight – policy controls the provision of housing and as such is out-of-date.
CC03 – Green Infrastructure, Trees and Landscaping	Full Weight.
CC09 – Development and Flood Risk	Limited weight due to more up-to-date national guidance being available.
CC10 – Sustainable Drainage	Limited weight due to more up-to-date national guidance being available.
TB08 – Open space, sport and recreation facilities standards for residential development	Full weight.
TB12 – Employment Skills Plan	Full weight.
TB21 – Landscape Character	Very limited weight – policy controls the provision of housing and as such is out-of-date.
TB23 – Biodiversity and Development	Limited weight due to more up-to-date national guidance being available.

7. Matters in Agreement

- 7.1. Reason for Refusal 2 (Agricultural land) can be overcome by way of additional information being provided ahead of the Inquiry.
- 7.2. Reason for Refusal 5 (flooding) can be overcome by way of additional information being provided ahead of the Inquiry.
- 7.3. Reason for Refusal 6 and 7 (BNG and Ecology Surveys) can be overcome by way of additional information being provided ahead of the Inquiry.
- 7.4. Reasons for Refusal 8, 9, 10 and 11 would all fall away by way of process (through S106 drafting). Detailed below is an explanation as to how these matters are resolvable, leaving reason 1, 3 and 4 for further discussion in Chapter 9.
- 7.5. As a result of lack of Five Year Housing Supply the following Local Plan policies, which are most important for determining the application, in WBC should be considered 'out of date'. Any weight afforded to planning policies is set out in Chapter 6 of this SoCG.

Core Strategy

- CP1 – Sustainable Development
- CP3 – General Principles of Development
- CP5 – Housing Mix, Density and Affordability
- CP6 – Managing Travel Demands
- CP9 – Scale and Location of Development Proposals
- CP11 – Proposals outside Development Limits (including countryside)

Development Management Delivery Document

- CC01 – Presumption in favour of Sustainable Development
- CC02 – Development Limits
- TB21 – Landscape Character

- 7.6. Below is an agreed set of benefits and harms, along with their associated weightings.

Benefit / Harm	Weighting
The provision of much needed affordable housing, totalling 50% of the units;	Very significant weight
The delivery of 99 much needed, high quality, family sized homes;	Significant weight
Delivery of a critical cycle connection to Twyford Railway Station (in line with the WBC LCWIP Proposals)	Significant weight
Improvements to pedestrian infrastructure throughout Hurst (Lodge Road, Broadwater Lane and Tape Lane) including the provision of new footways, widening of existing footways, improved crossing provision and traffic calming measures.	Moderate weight
Enhances the biodiversity of the site by more than 10%.	Moderate weight
Economic benefits	Moderate weight
Delivery of Bus Improvement Strategy.	Limited weight

Environmental benefit (Green Infrastructure provision and long term management of new public open space)	Limited weight
Public access and play provision	Limited weight
Harm to the landscape (local)	Moderate harm
Loss of Best most versatile agricultural land	Limited harm

8. Matters in Dispute

- 8.1. The Appellant disputes the weight afforded to the adopted Local Plan due to its outdated nature, meaning it cannot adequately address current needs.
- 8.2. The Appellant disputes the interpretation and implementation of housing policies.
- 8.3. The Appellant disputes Reason for Refusal 1 relating to the site being designated 'Countryside outside of settlement limits'.
- 8.4. The Appellant disputes Reason for Refusal 1 relating to the proposals being contrary to the spatial objectives of the development plan and policies.
- 8.5. The Appellant disputes Reason for Refusal 3 relating to the interpretation and weight to be afforded to policies in connection with perceived harm caused to the landscape, character and appearance associated with the proposed development.
- 8.6. The Appellant disputes Reason for Refusal 4, establishing through the SoC and Highways SoCG how the proposals improve the sustainable nature of the site.
- 8.7. Further explanation is found in Chapter 8 of the Appellants Statement of Case.

9. Planning Conditions and Unilateral Undertaking

- 9.1. Should the Inspector be minded to uphold this Appeal, and grant planning permission, suitable planning conditions will be drafted through the Final Statement of Common Ground.
- 9.2. A S106 Obligation will be prepared to accompany the appeal.

10. Agreement

10.1. This Statement of Common Ground has been prepared jointly between the Council and the Appellant.

Signed on behalf of the Council (Wokingham Borough Council)

Name _____ Signature _____ Date _____

.....

Singed on behalf of the Appellant (Mactaggart and Mickel Strategic Land)

Name _____ Signature _____ Date _____

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