

Reserved Matters Heritage Assessment (incl. Archaeological DBA) .

South Wokingham Strategic Development Location (R07 and R13).

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1. Introduction

- 1.1. Pegasus Group have been commissioned to undertake an Archaeological Desk-based Assessment (ADBA) to support a Reserved Matters (RM) application for Parcels R07 and R13 within the South Wokingham Strategic Development Location, as shown on the Site Location Plan provided at Plate 1.



Plate 1: Site Location Plan

- 1.2. As part of this ADBA, a review of previous archaeological investigations within the area has taken place and the results summarised. As a result of the extensive works which have already taken place across the Site, this ADBA will focus on these previous archaeological investigation and the assessment will be based on this previous information.
- 1.3. The Assessment will also consider the detailed design of the parcel, including both built form and landscaping.
- 1.4. This Assessment provides information with regards to the significance of the historic environment to fulfil the requirement given in paragraph 207 of the Government's *National Planning Policy Framework* (the *NPPF*) which requires:
- "...an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting".¹***
- 1.5. In order to inform an assessment of the acceptability of the scheme in relation to impacts on the historic environment, following paragraphs 212 to 215 of the *NPPF*, any harm to the historic environment resulting from the proposed development is also described, including impacts on significance through changes to setting.

¹ Ministry of Housing, Communities & Local Government (MHCLG), *National Planning Policy Framework (NPPF)* (London, December 2024), para. 207.

- 1.6. As required by paragraph 207 of the NPPF, the detail and assessment in this Report is considered to be *"proportionate to the assets' importance"*.²
- 1.7. The significance of the built heritage resource within, and within the vicinity of the site was considered in detail within the Environmental Statement which accompanied the Hybrid Planning Permission and which considered a full set of parameters plans. This assessment thus considers the impact of the detailed proposals in the context of the baseline established through the Hybrid Permission.

² MHCLG, NPPF, para 207.

2. Proposed Development

- 2.1. Planning permission has been granted for the construction of a residential led scheme with access roads and other associated infrastructure.
- 2.2. The key elements of the scheme include:
- new homes,
 - new primary schools,
 - local shopping and community facilities,
 - open spaces, and,
 - roads including a South Wokingham Distributor Road.
- 2.3. This assessment only considers the archaeological potential of the housing development within areas R07 and R13 of the wider strategic development land, along with any impacts of the development on designated heritage assets within the direct environs of the parcel.
- 2.4. The archaeological potential of the site and the scale of effect to the archaeological resource has been previously assessed as part of the application process, as has the potential impact of the development on the historic built environment.

3. Site Description and Planning History

Site Description

- 3.1. The site lies to the south of Wokingham and forms part of the South Wokingham Strategic Development Land (SDL). It includes the areas of housing with associated, roads, parking, landscaping and utilities. The total area of the site amounts to c. 5.8ha.
- 3.2. The site is presently in use as a number of parcels of agricultural land, with the exception of the road tie-in which is located on Easthampstead Road.

Planning History

- 3.3. A suite of three applications for development in the SDL south of the railway (referred to as phase 2) was submitted to the planning committee on 18 May 2021, when the committee resolved to grant outline planning permission for up to 1,649 new homes (approximately 65% of the South Wokingham SDL development) subject to completion of S106 legal agreements to secure the necessary infrastructure and full planning permission for two Suitable Alternative Natural Greenspaces (SANG): a new SANG at Holme Park and St Anne's SANG, an extension to the existing Buckhurst Meadows SANG.
- 3.4. Other infrastructure (some of which is also intended to support the current proposal and vice versa, as part of

the comprehensive planning of the SDL) includes land for a two-form entry primary school, a local centre including land for a community facility and other public open space required to support the development on-site.

- 3.5. The application was a hybrid, seeking full planning permission for the SANG and outline planning permission for the remainder with access, appearance, landscaping, layout and scale all reserved, although the application does establish parameters for these matters.

A series of Reserved Matters Applications have been submitted and approved in relation to the Outline Permission, and this report supports a further Reserved Matters application flowing from this Outline Permission, relating to Parcels R07 and R13.

4. Methodology

- 4.1. The aims of this Report are to assess the significance of the heritage resource within the site/study area, to assess any contribution that the site makes to the heritage significance of the identified heritage assets, and to identify any harm or benefit to them which may result from the implementation of the development proposals, along with the level of any harm caused, if relevant.
- 4.2. The Report will provide a summary of the findings of previous archaeological investigations that have been undertaken in relation to the planning process for the development of the South of Wokingham Strategic Development Land.
- 4.3. Following the compilation of previous research, this assessment will then provide recommendations on the appropriate way forward in terms of the nature and scale of any further archaeological investigations that may be required.
- 4.4. This assessment considers the archaeological resource as well as built heritage considerations.

Sources

- 4.5. The following key sources have been consulted as part of this assessment:
 - The Berkshire Historic Environment Record (HER) for information on the recorded heritage resource within the vicinity of the site;
 - Historic maps available online;

- Historic England's Aerial Archaeology Mapping Explorer;
- The archaeological investigations carried out within the South Wokingham Strategic Development Area; and
- Other online resources, including Ordnance Survey Open Source data; geological data available from the British Geological Survey and Cranfield University's Soilscales Viewer; Google Earth satellite imagery; and LiDAR data from the Environment Agency.

- 4.6. A gazetteer of recorded sites and findspots is included as **Appendix 1** and maps illustrating the resource and study area are included as **Appendix 2**.

- 4.7. Historic cartographic sources and aerial photographs were reviewed for the site, and beyond this where professional judgement deemed necessary.

Assessment Methodology

- 4.8. Full details of the assessment methodology used in the preparation of this Report are provided within **Appendix 3**. However, for clarity, this methodology has been informed by the following:

- ClfA's *Standard and Guidance for Historic Environment Desk-Based Assessment*;³
- *Historic Environment Good Practice Advice in Planning: 2 – Managing Significance in Decision-Taking in the Historic Environment* (hereafter *GPA:2*);⁴
- *Historic England Advice Note 12 – Statements of Heritage Significance: Analysing Significance in Heritage Assets* (hereafter *HEAN:12*);⁵ and
- *Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment*.⁶

Consideration of Harm

- 4.9. It is important to consider whether the proposals cause harm. If they do, then one must consider whether the harm represents "substantial harm" or "less than

substantial harm" to the identified designated heritage assets, in the context of paragraphs 214 and 215 of the *NPPF*.⁷ With regard to non-designated heritage assets, potential harm should be considered within the context of paragraph 216 of the *NPPF*.⁸

- 4.10. The *PPG* clarifies that within each category of harm ("less than substantial" or "substantial"), the extent of the harm may vary and should be clearly articulated.⁹
- 4.11. The guidance set out within the *PPG* also clarifies that "substantial harm" is a high test, and that it may not arise in many cases. It makes it clear that it is the degree of harm to the significance of the asset, rather than the scale of development which is to be assessed.¹⁰ In addition, it has been clarified in a High Court Judgement of 2013 that substantial harm would be harm that would:

"...have such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced."

³ Chartered Institute for Archaeologists (ClfA), *Standard and Guidance for Historic Environment Desk-Based Assessment* (revised edition, October 2020).

⁴ Historic England, *Historic Environment Good Practice Advice in Planning: 2 – Managing Significance in Decision-Taking in the Historic Environment (GPA:2)* (2nd edition, Swindon, July 2015).

⁵ Historic England, *Historic England Advice Note 12 – Statements of Heritage Significance: Analysing Significance in Heritage Assets (HEAN:12)* (Swindon, October 2019).

⁶ English Heritage, *Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment* (London, April 2008).

⁷ MHCLG, *NPPF*, paras. 214 and 215.

⁸ MHCLG, *NPPF*, para. 216.

⁹ MHCLG, *Planning Practice Guidance (PPG)*, Paragraph: 018 (ID: 18a-018-20190723 Revision date: 23.07.2019).

¹⁰ MHCLG, *PPG*, Paragraph: 018 (ID: 18a-018-20190723 Revision date: 23.07.2019).

5. Policy Framework

Legislation

- 5.1. Legislation relating to the built historic environment is primarily set out within the *Planning (Listed Buildings and Conservation Areas) Act 1990*, which provides statutory protection for Listed Buildings and their settings and Conservation Areas.¹¹
- 5.2. In addition to the statutory obligations set out within the aforementioned Act, Section 38(6) of the *Planning and Compulsory Purchase Act 2004* requires that all planning applications, including those for Listed Building Consent, are determined in accordance with the Development Plan unless material considerations indicate otherwise.¹²
- 5.3. Full details of the relevant legislation are provided in **Appendix 4**.

¹¹ UK Public General Acts, Planning (Listed Buildings and Conservation Areas) Act 1990.

¹² UK Public General Acts, Planning and Compulsory Purchase Act 2004, Section 38(6).

National Planning Policy Guidance

- 5.4. National Planning Policy guidance relating to the historic environment is provided within Section 16 of the Government's *National Planning Policy Framework (NPPF)*, an updated version of which was published in December 2024. The NPPF is also supplemented by the national *Planning Policy Guidance (PPG)* which comprises a full and consolidated review of planning practice guidance documents to be read alongside the NPPF and which contains a section related to the Historic Environment.¹³ The *PPG* also contains the *National Design Guide*.¹⁴
- 5.5. Full details of the relevant national policy guidance are provided within **Appendix 5**.

The Development Plan

- 5.6. Applications for Planning Permission are currently considered against the policy and guidance set out within Wokingham Borough Local Development Framework Adopted Core Strategy Development Plan Document January 2010 as set out in **Appendix 6**.

¹³ Ministry of Housing, Communities & Local Government (MHCLG), *Planning Practice Guidance: Historic Environment (PPG)* (revised edition, 14th February 2024), <https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment>.

¹⁴ Ministry of Housing, Communities & Local Government (MHCLG), *National Design Guide* (London, January 2021).

6. The Historic Environment

- 6.1. This section provides a review of the recorded heritage resource within the site and its vicinity in order to identify any extant heritage assets within the site and to assess the potential for below-ground archaeological remains.
- 6.2. Designated heritage assets are referenced using their seven-digit NHLE number, HER 'event' numbers have the prefix ERM and HER 'monument' numbers have the prefix MRM, MWK or MBF.
- 6.3. A gazetteer of relevant heritage data is included as **Appendix 1**. HER records are illustrated on Figures 1 and 2 in **Appendix 2**.

Previous Archaeological Works

- 6.4. There are two previous archaeological investigations recorded on the HER that include the site as part of their scope.
- South Wokingham Distributor Road, Spine Road and Western Gateway, Berkshire. Archaeological Evaluation (ERM2347)
 - Land South of Wokingham – Archaeological Evaluation (ERM2511)

- 6.5. The results of these works are discussed below, where relevant to the potential archaeological resource of the site.

Topography and Geology

- 6.6. The site gently slopes from south-east (c. 63m aOD) to north-west (c. 57m aOD). The majority of the site is located within four agricultural fields that lie to the east of Easthampstead Road. The site is crossed by a number of watercourses and an overhead transmission line.
- 6.7. The bedrock geology of the site is formed of clay, silt and sand that are part of the London Clay Formation. No superficial deposits are recorded.¹⁵
- 6.8. The topsoil of the site is recorded as being slowly permeable seasonally wet slightly acid but base-rich loamy and clayey soils.¹⁶

¹⁵ British Geological Survey, *Geology of Britain Viewer*, <https://www.bgs.ac.uk/map-viewers/geology-of-britain-viewer/>.

¹⁶ Cranfield University, *Soilscapes*, <http://www.landis.org.uk/soilscapes/>.

Results of Previous Archaeological Works Within the Site

South Wokingham Distributor Road, Eastern Gateway,
Wokingham – Archaeological Evaluation

- 6.9. An archaeological evaluation¹⁷ (ERM2347) was undertaken in 2018 and 128 trenches were excavated with trenches 95 and 108 widened to fully expose potential features.
- 6.10. There were 30 trenches excavated within the R07 and R13 area.
- 6.11. Trenches 82, 88, 89, 91–94, 98, 99, 101, 102, 105–107, 109–118, 120, 121, 123, 124 and 126 were found to be archaeologically sterile.
- 6.12. Trench 95 contained a quarry pit [9503]. The feature was recorded but not excavated and is undated.
- 6.13. Trench 97 contained a single north–south aligned ditch [9703]. When excavated the ditch was found to have straight sides and contain limited amounts of CBM. The CBM was found to be modern which has provided a date for the ditch.
- 6.14. Trench 108 contained two pits. The trench was widened by two trench widths to identify whether there were additional features in the immediate environs but no further archaeological features were identified.
- 6.15. The Iron Age pit [10803], identified in Trench 108, contained 15 sherds of Middle Iron Age pottery, seven fragments of fired clay and three items of metal working debris, indicating possible evidence of ironworking.
- 6.16. Pit [10805] did not contain any dating evidence and as such cannot be definitely assigned to a specific period although it seems probable that it dates to the Iron Age.
- 6.17. Two possible gullies [10807] and [10809] were investigated but subsequently found to be geological features.
- 6.18. An environmental sample was taken from the fill (10804) of pit [10803]. The cereal remains included those of hulled wheat, emmer or spelt (*Triticum dicoccum/spelta*) and no chaff elements or weed seeds were recorded. The assemblage was considered to represent dispersed domestic waste material with no evidence for any settlement activities taking place in the immediate vicinity.

¹⁷ Cotswold Archaeology (2018) South Wokingham Distributer Road,

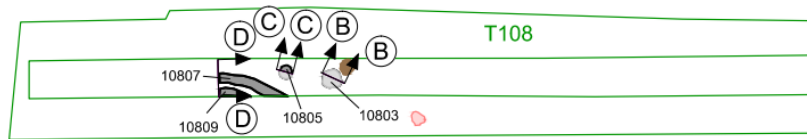


Plate 2: Plan of Trench 108

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Land South of Wokingham – Archaeological Evaluation

- 6.19. An archaeological evaluation¹⁸ of land south of Wokingham (ERM2511) was undertaken in 2019. The evaluation involved the excavation of 96 trenches, of which 82 were archaeologically sterile.
- 6.20. Trench 41 lay partially within parcel R07 and trench 42 lay immediately adjacent to its southern boundary. Both of these trenches were found to be archaeologically sterile.
- 6.21. There were eight trenches excavated as part of this evaluation within parcel R13. Trenches 25, 27, 30 and 32 were found to be archaeologically sterile. Archaeological remains were identified in trenches 26, 28, 29 and 31.
- 6.22. Trench 26 contained a single ditch [2604] and a large area of disturbance (2606), (2608), (2610) and (2610). Ditch [2604] ran east-west and contained a pot sherd (dated to between AD 1720–1780), 19th-century brick and clay tobacco pipe (dated to the 18th or 19th century).
- 6.23. Trench 28 contained a single small and shallow ditch [2803] with no datable finds in it. The ditch was aligned north-south.
- 6.24. Trench 29 contained a tree-throw [2904] at its southern end and an east-west aligned ditch [2906] at its northern end. The ditch contained no dating evidence.
- 6.25. Trench 31 contained a tree throw [3103] and a north-south aligned ditch [3106]. No dating evidence was recovered from the features within trench 31.

¹⁸ Oxford Archaeology (2019) Land South of Wokingham – Archaeological Evaluation Report (OA Ref. JN7503)

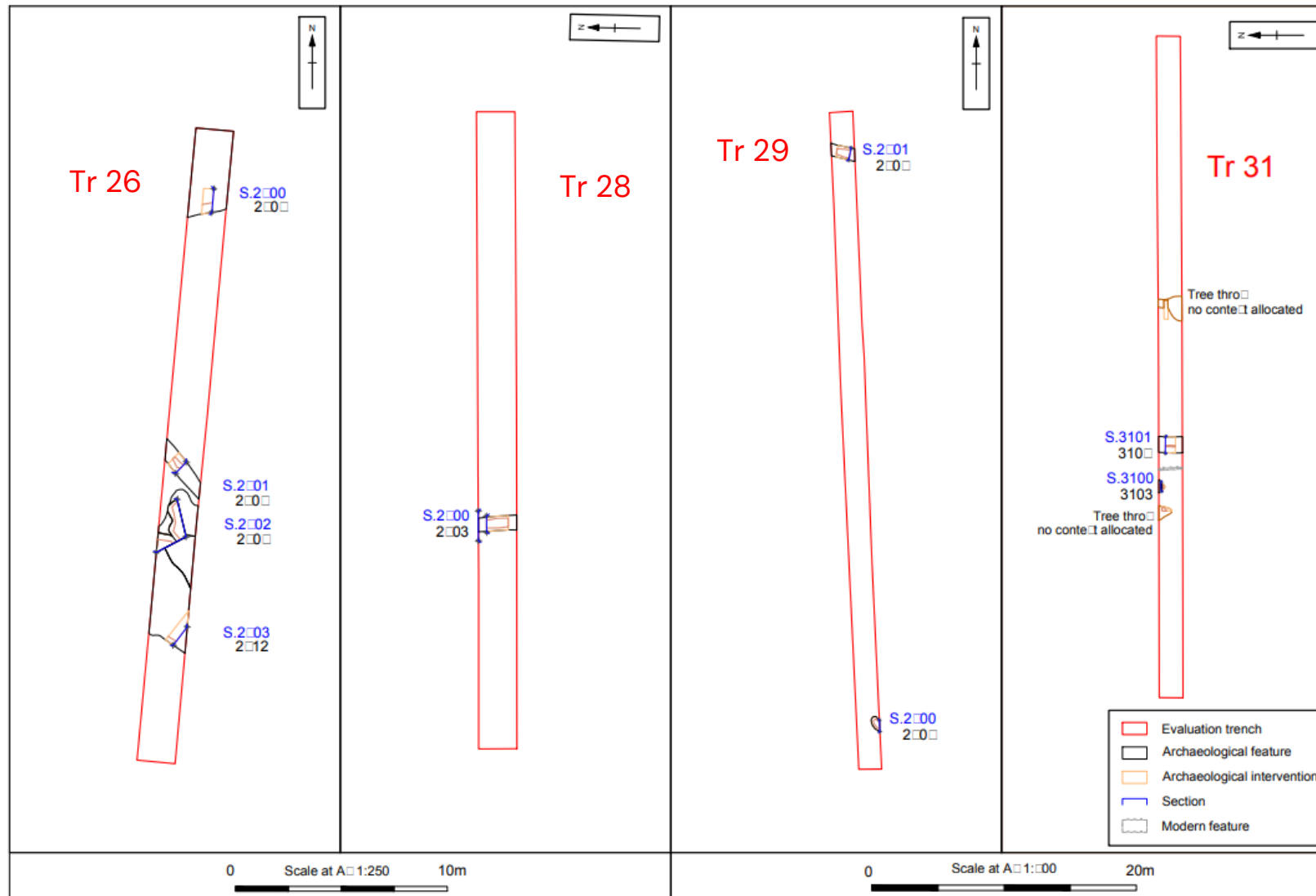


Plate 4: Trench plans for trenches 26, 28, 29 and 31 within site

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HER Data

- 6.26. The HER records no heritage assets or findspots within parcel R07.
- 6.27. There are very limited recorded HER assets in proximity to parcel R07 with only one record within 100m of the parcel boundary. This is:
- Railway line between Wokingham Station and Bracknell Station, Berkshire (MWK6138)
- 6.28. There is one heritage asset recorded on the HER located within parcel R13 which is an area of ridge and furrow (MWK7120).
- 6.29. To the immediate east of parcel R13 there are three points recorded by the HER. These all relate to:
- Possible settlement activity west of Brittons Farm, Wokingham, Berkshire (MRM18525).

7. Built Heritage Considerations

- 7.1. This section considers the detailed proposal for Parcels R07 and R13 with respect to the built historic environment against the baseline established via the Hybrid Planning permission for redevelopment of the wider site (Phase 2b – application reference 191068).
- 7.2. Consideration has been made as to whether the detailed development proposals would have any greater or lesser impact than that previously accepted.
- 7.3. Parcels R07 and R13 were shown on the approved Land Use Parameter Plan (reference P18-0893_190 A, see Plate 6 below, a full copy of which is provided at **Appendix 7**) as comprising residential development parcels with a buffer of greenspace along the western boundary with the Woods Farm complex, and other green infrastructure and indicative attenuation located across the Parcels.



Plate 6: Extract of approved Land Use Parameter Plan

- 7.4. With specific reference to the built historic environment, the approved parameters plans set out approved building heights (reference P18-0963_82P-04) and open space (reference P18-0893_82P-03), extracts of which showing the area of Parcels R07 and R13 are provided at Plate 7 and Plate 8, with full copies provided at **Appendix 7**. The approved Landscape Masterplan (reference P19-0052_16D) also detailed the landscaping around Parcels R07 and R13 (see extract at below at Plate 9 and full copy provided within **Appendix 7**).

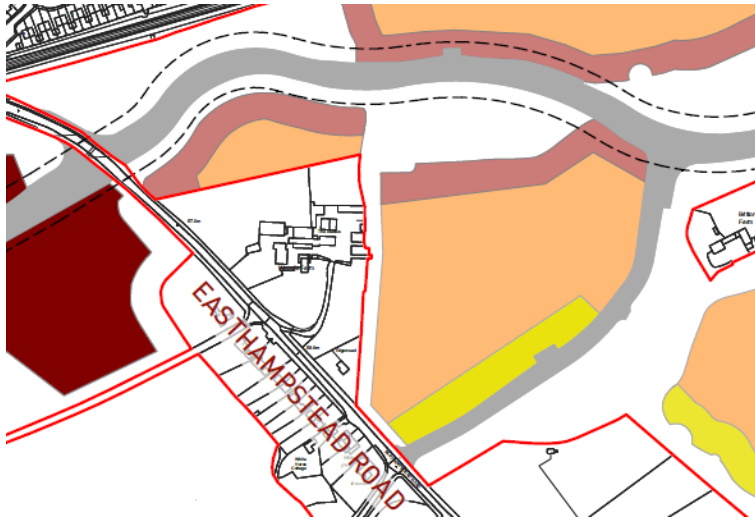


Plate 7: Extract of approved Building Heights Parameter Plan



Plate 8: Extract of approved Open Space Parameter Plan



Plate 9: Extract of approved Landscape Masterplan

- 7.5. The closest heritage assets which were considered as part of the Environmental Statement which supported the Hybrid Permission were the Grade II Listed Wood's Farm (NHLE 1118119) which lies to the west of Parcel R13 and the Grade II Listed Farm house and Barn at Britton's Farm (NLHE 1319141 and 1118083), which lie to the east beyond the landscape buffer outside of Parcel R13.
- 7.6. With reference to Parcels R07 and R13, the Archaeology and Cultural Heritage Chapter of the Environmental Statement concluded that the proposals would result in the change of character of the landscape surrounding the Woods' Farm and Britton's Farm complex from agricultural to residential, and new roads would be established in the vicinity of the assets. However, it recognised that green buffers of open land would remain around the buildings which would remain intelligible as a historic farm complex. Overall, it was assessed that the development would result in minor impacts on the heritage significance of the designated heritage assets at

Wood's Farm and Britton's Farm., which in the terms of the NPPF would be considered to be less than substantial, at the lower end of the spectrum.

- 7.7. The mitigation measures (identified within the Environmental Statement assessment) were set out within the approved Open Space Parameter Plan and the approved Landscape Masterplan which showed the retention and strengthening of the landscape buffer/boundary between the site and Wood's Farm.
- 7.8. With respect to proposed building heights, the detailed proposals for Parcels R07 and R13 fully align with the parameter set by the Hybrid approval, with those dwellings at the north and west of the Wood's Farm complex, closest to the Listed Buildings being up to 2.5 storeys in height, as assessed within the Environmental Statement, thus having no greater or lesser impact than previously assessed and accepted. This is also the case with regards to the buildings closest to the Britton's Farm complex to the east.
- 7.9. The detailed landscaping for Parcels R07 and R13 also broadly aligns with that detailed on the approved parameters plans and Landscape Masterplan, and in particular shows buffer planting around the perimeter of the Wood's Farm complex (see extract Plate 10) which has retained and strengthened thus mitigating the impact of the proposals as per the assessment set out within the Environmental Statement.



Plate 10: Extract of proposed Landscape Masterplan ref. P24-2114_EN_50A

- 7.10. As such, it is considered that the impact of the proposed detailed design for Parcels R07 and R13 is within the parameter which was assessed within the Environmental Statement and considered acceptable within the approved Hybrid Permission.

8. Conclusions

- 8.1. The site has been subject to trial trench evaluation which has largely produced archaeologically sterile results.
- 8.2. The presence of an Iron Age pit, two undated features (one ditch and one pit), a post-medieval ditch and an area of post-medieval disturbance within the site has been recorded by the previous investigations.
- 8.3. A draft mitigation strategy was prepared in 2020. In line with the proposals set out in the draft mitigation strategy, the archaeological potential for parcels R07 and R13 was determined to be insufficient to require further archaeological investigation.
- 8.4. Overall, it is considered that the detailed layout and design for Parcels R07 and R13 would accord with the parameters set out by the Hybrid Permission and would not cause any additional impact than that which was assessed within the Archaeology and Cultural Heritage Chapter of the Environmental Statement.

Sources

Legislation
UK Public General Acts, Ancient Monuments and Archaeological Areas Act 1979.
UK Public General Acts, Planning (Listed Buildings and Conservation Areas) Act 1990.
UK Public General Acts, Planning and Compulsory Purchase Act 2004.

Policy and Guidance
Chartered Institute for Archaeologists (CIfA), <i>Standard and Guidance for Historic Environment Desk-Based Assessment</i> (revised edition, October 2020).
Ministry of Housing, Communities & Local Government (MHCLG), <i>National Planning Policy Framework (NPPF)</i> (London, December 2024).
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English Heritage, <i>Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment</i> (London, April 2008).
Historic England, <i>Conservation Area Appraisal, Designation and Management, Historic England Advice Note 1</i> (2 nd edition, Swindon, February 2019).

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Historic England, <i>Statements of Heritage Significance: Analysing Significance in Heritage Assets</i> , Historic England Advice Note 12 (Swindon, October 2019).
Historic England, <i>The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3</i> (2 nd edition, Swindon, December 2017).

Court and Appeal Decisions
Barnwell Manor Wind Energy Ltd v (1) East Northamptonshire DC & Others [2014] EWCA Civ 137.
Bedford Borough Council v Secretary of State for Communities and Local Government [2013] EWHC 2847 (Admin).
Catesby Estates Ltd. V. Steer [2018] EWCA Civ 1697.
Jones v Mordue [2015] EWCA Civ 1243.
Kay, R (on the application of) v Secretary of State for Housing Communities and Local Government & Anor [2020] EWHC 2292 (Admin).
Palmer v Herefordshire Council & Anor [2016] EWCA Civ 1061.
R (Forge Field Society) v Sevenoaks District Council [2014] EWHC 1895 (Admin).

Secondary Sources and Grey Literature
AOC (2017) <i>South Wokingham Distributor Road, Eastern Gateway, Wokingham: An Archaeological Evaluation Report</i> (Project No: 33345)
British Geological Survey, <i>Geology of Britain Viewer</i> , https://www.bgs.ac.uk/map-viewers/geology-of-britain-viewer/
Cotswold Archaeology (2018) <i>South Wokingham Distributor Road, Spine Road and Western Gateway, Berkshire. Archaeological Evaluation</i> (Project ref. 770798)
Cranfield University, <i>Soilscapes</i> , http://www.landis.org.uk/soilscapes/
Oxford Archaeology (2019) <i>Land South of Wokingham – Archaeological Evaluation Report</i> (OA Ref. JN7503)
Pegasus Group (2019) <i>Land at phase 2 of the South Wokingham SDL Environmental Statement Volume 1: Archaeology and Built Heritage</i>
Pegasus Group (2020) <i>Archaeological Mitigation Statement: South Wokingham SDL, West Berkshire</i>
Solent Thames Research Framework: Library (oxfordarchaeology.com)
Wessex Archaeology (2021) <i>Eastern Gateway – Wokingham Major Highways Programme, Berkshire – Post-excavation Assessment</i> (Project ref. 209226)
WSP (2016) <i>Historic Environment Desk Based Assessment: South Wokingham Distributor Road, Wokingham Eastern Gateway</i> (report no. 70017202)
WSP (2017) <i>Eastern Gateway – Environmental Statement: Chapter 5, Cultural Heritage</i> (Project No. 70017202)

Appendix 1: Gazetteer

Heritage Data

HER Event Data

Ev UID	Name	Event Type
ERM1061	Peacock Farm, Bracknell, Berkshire	Evaluation
ERM1130	Land off Plough Lane, Wokingham, Berkshire	Geophysical Survey
ERM1157	Land at Plough Lane, Wokingham, Berkshire	Evaluation
ERM1442	Buckhurst Farm, London Road, Wokingham	Evaluation
ERM1714	Buckhurst Park, Wokingham, Berkshire	DBA
ERM1772	Montague School, Buckhurst Farm, London Road, Wokingham	Excavation
ERM2086	South Wokingham Distribution Road Eastern Gateway - Historic Environment Desk Based Assessment	DBA
ERM2087	South Wokingham Distributor Road, Eastern Gateway, Wokingham	Evaluation
ERM2264	Keephatch Beech, Wokingham, Berkshire. Archaeological Evaluation	Evaluation
ERM2266	Keephatch Beech Lane (Main site), Wokingham, Berkshire. Archaeological Excavation	Excavation

ERM2347	South Wokingham Distributor Road, Spine Road and Western Gateway, Berkshire. Archaeological Evaluation	Evaluation
ERM2399	Archaeological Desk-Based Assessment. Land at Buckhurst Moors, Moors Lane, Amen Corner, Bracknell	DBA
ERM2400	Archaeological Desk-Based Assessment. Land South of London Road, Binfield	DBA
ERM2477	Greenacres, St Anne's Drive, Wokingham - Archaeological Desk-Based Assessment	DBA
ERM2511	Land South of Wokingham - Archaeological Evaluation	Evaluation
ERM2552	Pudner Land, South of Waterloo Road and West of Old Wokingham Road, South Wokingham, Berkshire	Evaluation
ERM2574	Land south of London Road, Binfield, Bracknell - Archaeological Evaluation	Evaluation
ERM2578	Land at Amen Corner South, Bracknell, Berkshire: Archaeological Evaluation	Evaluation
ERM2640	Eastern Gateway - Wokingham Major Highways Programme - Excavation and Watching Brief	Watching Brief
ERM278	East Berkshire Archaeological Survey	Survey
ERM355	Buckhurst Farm, Wokingham, Berkshire	Evaluation
ERM388	The Barn House, Waterloo Road, Wokingham, Berkshire	Watching Brief

ERM413	Peacock Farm, Bracknell	DBA
ERM526	Peacock Farm Bracknell Berkshire - Phase 1A, 1B and the Commercial Area	Evaluation
ERM527	Peacock Farm Bracknell Berkshire - Phases 2, 3, and 4	Evaluation
EWK7	Buckhurst Farm, Wokingham, Berkshire	DBA

HER Monument Data

Mon UID	Pref Ref	Name	Mon Type	Period
MBF13528	03204.00.000	Waste flake – EBAS, Bracknell, Berkshire	FINDSPOT	Prehistoric
MBF13537	03207.00.000	Prehistoric findspot – East Berkshire Archaeological Survey, Bracknell, Berkshire	FINDSPOT	Prehistoric
MBF13940	03352.00.000	Medieval pottery sherd – East Berkshire Archaeological Survey, Bracknell, Berkshire	FINDSPOT	Medieval
MBF13941	03353.00.000	Medieval pottery sherds – East Berkshire Archaeological Survey, Bracknell, Berkshire	FINDSPOT	Medieval
MBF14216	03430.00.000	Medieval pottery sherd – EBAS, Bracknell, Berkshire	FINDSPOT	Medieval
MBF15469	03204.01.000	Flint flake – EBAS, Bracknell, Berkshire	FINDSPOT	Prehistoric

MBF15470	03204.02.000	Flint scraper – EBAS, Bracknell, Berkshire	FINDSPOT; SITE	Prehistoric
MBF15475	03207.01.000	Prehistoric scraper – East Berkshire Archaeological Survey, Bracknell, Berkshire	FINDSPOT	Prehistoric
MBF485	00368.03.000	Cropmark features – Easthampstead Park, Bracknell, Berkshire	FIELD SYSTEM	Post Medieval
MBF486	00368.03.100	Cropmark field system – Easthampstead Park, Bracknell, Berkshire	FIELD SYSTEM	Unknown
MBF487	00368.03.200	Cropmark field system – Easthampstead Park, Bracknell, Berkshire	FIELD SYSTEM	Unknown
MBF488	00368.03.300	Cropmark pond – Easthampstead Park, Bracknell, Berkshire	POND	Unknown
MBF4936	03071.00.000	Mesolithic flint scatter – EBAS PREH 340 – Bracknell, Berkshire	FLINT SCATTER; OPEN SITE?	Mesolithic
MBF6138	05057.01.000	Railway between Wokingham and Bracknell, Berkshire	RAILWAY	Post Medieval
MRM16378	MRM16378	Upper Palaeolithic and Mesolithic lithics found near Amen Corner, Binfield, Berkshire	FINDSPOT; FINDSPOT; FINDSPOT; FEATURE?	Prehistoric
MRM16390	MRM16390	Roman pottery sherds found near Amen Corner, Binfield, Berkshire	FINDSPOT	Roman

MRM16444	MRM16444	Late medieval/early post-medieval field boundaries at Plough Lane, Binfield	BOUNDARY DITCH; DITCH	Medieval to Post Medieval
MRM16453	MRM16453	Ridge and Furrow near A329M, Wokingham	RIDGE AND FURROW	Medieval
MRM16454	MRM16454	Crop mark anomalies near A329M Wokingham	BOUNDARY?; FEATURE?	Post Medieval
MRM16643	MRM16643	Post-medieval field systems and enclosure near Amen Corner, Binfield, Berkshire	FIELD SYSTEM; FIELD BOUNDARY	Post Medieval to Early 20th Century
MRM16775	MRM16775	Medieval features at Buckhurst Farm, Wokingham	GULLY; DITCH	Medieval
MRM16776	MRM16776	Undated linear features at Buckhurst Farm, Wokingham	GULLY; DITCH; PIT	Unknown
MRM16777	MRM16777	Post-medieval field system at Buckhurst Farm, Wokingham, Berkshire	GULLY; DITCH; FIELD SYSTEM	Post Medieval to Modern
MRM16778	MRM16778	Roman pottery sherds at Buckhurst Farm, Wokingham, Berkshire	FINDSPOT	Roman
MRM16787	MRM16787	Possible cropmark features at Buckhurst Farm, Wokingham, Berkshire	LINEAR FEATURE; BOUNDARY	Unknown
MRM16798	MRM16798	Medieval pottery sherds – near Amen Corner, Bracknell, Berkshire	FINDSPOT	Medieval
MRM16800	MRM16800	A Roman pottery sherd found near Amen Corner, Binfield, Berkshire	FINDSPOT	Roman

MRM16801	MRM16801	Mesolithic flint flakes and blades found near Amen Corner, Binfield, Berkshire	FINDSPOT	Late Mesolithic
MRM16804	MRM16804	Mesolithic or Neolithic flint blades and flakes found near Amen Corner, Binfield, Berkshire	FINDSPOT	Early Mesolithic to Late Neolithic
MRM16807	MRM16807	Mesolithic or Neolithic side scraper and struck flint flake found near Amen Corner, Binfield, Berkshire	FINDSPOT	Late Mesolithic to Late Neolithic
MRM17492	MRM17492	Former gravel extraction works on land north-west of Amen Corner, Binfield, Berkshire	GRAVEL PIT	Post Medieval to Modern
MRM18262	MRM18262	A north-south boundary earthwork to the west of Binfield	BOUNDARY BANK	Medieval
MRM18270	MRM18270	Roman features – South Wokingham Distributor Road, Eastern Gateway, Wokingham	ENCLOSURE?; DITCH; FIELD SYSTEM?; PIT; DITCH	Roman
MRM18357	MRM18357	Iron Age linear boundary ditches – Keephatch, Beech Lane, Wokingham, Berkshire	BOUNDARY DITCH	Early Iron Age to Middle Iron Age
MRM18358	MRM18358	Medieval ditches – Keephatch, Beech Lane, Wokingham, Berkshire	BOUNDARY DITCH	Medieval
MRM18359	MRM18359	Post-medieval features – Keephatch, Beech Lane, Wokingham, Berkshire	BOUNDARY DITCH; BOUNDARY DITCH; PIT; POST HOLE	Post Medieval

MRM18360	MRM18360	Worked flint – Keephatch, Beech Lane, Wokingham, Berkshire	FINDSPOT; FINDSPOT	Prehistoric
MRM18445	MRM18445	Middle Iron Age pit – South Wokingham Distributor Road, Spine Road and Western Gateway, Berkshire	PIT	Middle Iron Age
MRM18525	MRM18525	Possible settlement activity west of Brittons Farm, Wokingham, Berkshire	ENCLOSURE?; FIELD SYSTEM; FINDSPOT	Lower Palaeolithic to Saxon
MRM18526	MRM18526	Possible settlement activity south of Wokingham, Wokingham, Berkshire	DITCH; PIT; POST HOLE	Prehistoric
MRM18540	MRM18540	Undated linear feature – Pudner Land, South of Waterloo Road, West of Old Wokingham Road, Wokingham, Berkshire	LINEAR FEATURE	Unknown
MRM18558	MRM18558	Undated features and worked and burnt flint – Land south of London Road, Binfield, Bracknell	FINDSPOT; DITCH; PIT	Prehistoric
MRM18581	MRM18581	Late Prehistoric postholes/stakeholes, pottery and burnt flint – Eastern Gateway (WMHP), Waterloo Road, Wokingham	POST HOLE; STAKE HOLE; FINDSPOT; STAKE HOLE	Late Prehistoric
MRM18582	MRM18582	Possible medieval pits – Eastern Gateway (WMHP), Waterloo Road, Wokingham	RUBBISH PIT	Medieval
MRM18583	MRM18583	Post-medieval ditches – Eastern Gateway (WMHP), Waterloo Road, Wokingham	BOUNDARY DITCH; GULLY	Post Medieval

MRM18584	MRM18584	Undated features – Eastern Gateway (WMHP), Waterloo Road, Wokingham	WATERHOLE?; PIT; POST HOLE	Unknown
MWK11480	02204.00.000	Neolithic arrowhead – 34 Rances Lane, Wokingham, Berkshire	FINDSPOT	Late Neolithic
MWK13523	03201.00.000	Prehistoric findspot – EBAS, Wokingham Without, Berkshire	FINDSPOT	Prehistoric
MWK13525	03202.00.000	Flint blade – EBAS, Wokingham Without, Berkshire	FINDSPOT	Prehistoric
MWK13939	03351.00.000	Medieval sherds–East Berkshire Archaeological Survey, Wokingham, Berkshire	FINDSPOT	Medieval
MWK13950	03359.00.000	Medieval pottery sherd – EBAS, Wokingham Without, Berkshire	FINDSPOT	Medieval
MWK13951	03360.00.000	Medieval pottery sherd – EBAS, Wokingham Without, Berkshire	FINDSPOT	Medieval
MWK14129	03405.00.000	Roman pottery sherd – EBAS, Wokingham Without, Berkshire	FINDSPOT	Roman
MWK14130	03406.00.000	Roman pottery sherd – EBAS, Wokingham Without, Wokingham, Berkshire	FINDSPOT	Roman
MWK14131	03407.00.000	Roman pottery sherd – EBAS, Wokingham Without, Wokingham, Berkshire	FINDSPOT	Roman

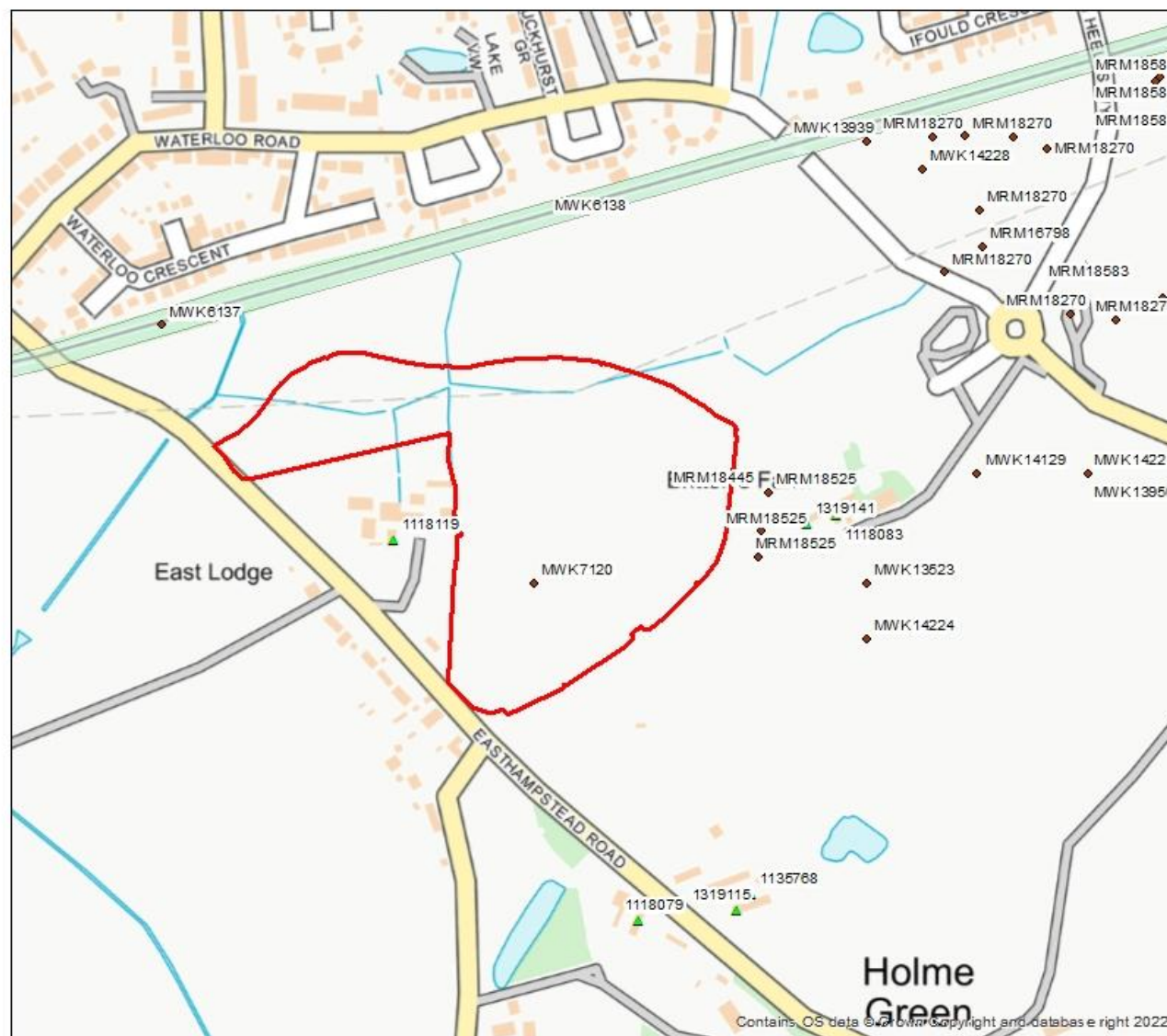
MWK14219	03431.00.000	Medieval pottery – EBAS, Wokingham Without, Wokingham, Berkshire	FINDSPOT	Medieval
MWK14221	03432.00.000	Medieval pottery–EBAS, Wokingham Without, Wokingham, Berkshire	FINDSPOT	Medieval
MWK14224	03433.00.000	Medieval pottery – EBAS, Wokingham Without, Wokingham, Berkshire	FINDSPOT	Medieval
MWK14228	03434.00.000	Medieval pottery–East Berkshire Archaeological Survey, Wokingham, Berkshire.	FINDSPOT	Medieval
MWK566	00373.00.000	An undated hearth near Plough Farm, London Road, Wokingham, Berkshire	HEARTH	Unknown
MWK6137	05057.00.000	London and South Western Railway (Wokingham to Ascot, Berkshire)	RAILWAY	Post Medieval
MWK6138	05057.01.000	Railway line between Wokingham Station and Bracknell Station, Berkshire	RAILWAY	Post Medieval to Modern
MWK6335	04197.00.000	Prehistoric flint finds and medieval pottery – Buckhurst Farm, Wokingham, Berkshire	FINDSPOT; FINDSPOT; FINDSPOT; FINDSPOT	Lower Palaeolithic to Medieval
MWK7120	06376.00.000	Ridge and furrow at Wood's Farm, Wokingham Without, Berkshire	RIDGE AND FURROW	Medieval to Post Medieval
MWK7204	06419.00.000	Pottery scatter at Sutton Court Farm, Wokingham Without, Berkshire	ARTEFACT SCATTER	Post Medieval



MWK8112	00367.00.000	Mesolithic axe-head - Wokingham, Berkshire	FINDSPOT	Mesolithic
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Appendix 2: Figures



KEY

- R7_R13_Combined
- ▲ Listed Building Grade II*
- ▲ Listed Building Grade II
- ◆ HER monuments point
- HER monuments polyline
- HER monuments region

Figure 2: Heritage Assets

South Wokingham

Client: -

DRWG No: HT_Fig2

Sheet No: - REV: -

Drawn by: JM

Approved by: AR

Date: 12/12/2025

Scale: 1:5,000 @ A3

Appendix 3: Assessment Methodology

Assessment of significance

In the *NPPF*, heritage significance is defined as:

“The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site’s Statement of Outstanding Universal Value forms part of its significance.”¹⁹

Historic England's *GPA:2* gives advice on the assessment of significance as part of the application process. It advises understanding the nature, extent, and level of significance of a heritage asset.²⁰

In order to do this, *GPA 2* also advocates considering the four types of heritage value an asset may hold, as identified in English Heritage's *Conservation Principles*.²¹ These essentially cover the heritage ‘interests’ given in the glossaries of the *NPPF* and the *PPG* which are archaeological, architectural and artistic, and historic.²²

The *PPG* provides further information on the interests it identifies:

- **Archaeological interest:** As defined in the Glossary to the National Planning Policy Framework, there will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.
- **Architectural and artistic interest:** These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skills, like sculpture.
- **Historic interest:** An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation’s history, but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.²³

¹⁹ MHCLG, *NPPF*, Annex 2.

²⁰ Historic England, *GPA:2*.

²¹ Historic England, *Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment* (London, April 2008). These heritage values

are identified as being ‘aesthetic’, ‘communal’, ‘historical’ and ‘evidential’, see *idem* pp. 28–32.

²² MHCLG, *NPPF*, Annex 2; MHCLG, *PPG*, paragraph 006, reference ID: 18a-006-2019072.

²³ MHCLG, *PPG*, paragraph 006, reference ID: 18a-006-20190723.

Significance results from a combination of any, some, or all of the interests described above.

Historic England guidance on assessing heritage significance, *HEAN:12*, advises using the terminology of the *NPPF* and *PPG*, and thus it is that terminology which is used in this Report.²⁴

Listed Buildings and Conservation Areas are generally designated for their special architectural and historic interest. Scheduling is predominantly, although not exclusively, associated with archaeological interest.

Setting and significance

As defined in the *NPPF*:

“Significance derives not only from a heritage asset’s physical presence, but also from its setting.”²⁵

Setting is defined as:

“The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.”²⁶

Therefore, setting can contribute to, affect an appreciation of significance, or be neutral with regards to heritage values.

Assessing change through alteration to setting

How setting might contribute to these values has been assessed within this Report with reference to *GPA:3*, particularly the checklist given on page 11. This advocates the clear articulation of “*what matters and why*”.²⁷

In *GPA:3*, a stepped approach is recommended, of which Step 1 is to identify which heritage assets and their settings are affected. Step 2 is to assess whether, how and to what degree settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated. The guidance includes a (non-exhaustive) checklist of elements of the physical surroundings of an asset that might be considered when undertaking the assessment including, among other things: topography, other heritage assets, green space, functional relationships and degree of change over time. It also lists aspects associated with the experience of the asset which might be considered, including: views, intentional intervisibility, tranquillity, sense of enclosure, accessibility, rarity and land use.

Step 3 is to assess the effect of the proposed development on the significance of the asset(s). Step 4 is to explore ways to maximise enhancement and minimise harm. Step 5 is to make and document the decision and monitor outcomes.

A Court of Appeal judgement has confirmed that whilst issues of visibility are important when assessing setting, visibility does not necessarily confer a contribution to significance and factors other than visibility should also be considered, with Lindblom LJ stating at

²⁴ Historic England, *Statements of Heritage Significance: Analysing Significance in Heritage Assets*, Historic England Advice Note 12 (Swindon, October 2019).

²⁵ MHCLG, *NPPF*, Annex 2.

²⁶ MHCLG, *NPPF*, Annex 2.

²⁷ Historic England, *GPA:3*, pp. 8, 11.

paragraphs 25 and 26 of the judgement (referring to an earlier Court of Appeal judgement):

Paragraph 25 – “But – again in the particular context of visual effects – I said that if “a proposed development is to affect the setting of a listed building there must be a distinct visual relationship of some kind between the two – a visual relationship which is more than remote or ephemeral, and which in some way bears on one’s experience of the listed building in its surrounding landscape or townscape” (paragraph 56)”.

Paragraph 26 – “This does not mean, however, that factors other than the visual and physical must be ignored when a decision-maker is considering the extent of a listed building’s setting. Generally, of course, the decision-maker will be concentrating on visual and physical considerations, as in Williams (see also, for example, the first instance judgment in R. (on the application of Miller) v North Yorkshire County Council [2009] EWHC 2172 (Admin), at paragraph 89). But it is clear from the relevant national policy and guidance to which I have referred, in particular the guidance in paragraph 18a–013–20140306 of the PPG, that the Government recognizes the potential relevance of other considerations – economic, social and historical. These other considerations may include, for example, “the historic relationship between places”. Historic England’s advice in GPA3 was broadly to the same effect.”²⁸

Levels of significance

Descriptions of significance will naturally anticipate the ways in which impacts will be considered. Hence descriptions of the significance of Conservation Areas will make reference to their special interest and character and appearance, and the significance of Listed Buildings will be discussed with reference to the building, its setting and any features of special architectural or historic interest which it possesses.

In accordance with the levels of significance articulated in the *NPPF* and the *PPG*, three levels of significance are identified:

- **Designated heritage assets of the highest significance**, as identified in paragraph 213 of the *NPPF*, comprising Grade I and II* Listed Buildings, Grade I and II* Registered Parks and Gardens, Scheduled Monuments, Protected Wreck Sites, World Heritage Sites and Registered Battlefields (and also including some Conservation Areas) and non-designated heritage assets of archaeological interest which are demonstrably of equivalent significance to Scheduled Monuments, as identified in footnote 75 of the *NPPF*;²⁹
- **Designated heritage assets of less than the highest significance**, as identified in paragraph 213 of the *NPPF*, comprising Grade II Listed Buildings and Grade II Registered Parks and Gardens (and also some Conservation Areas);³⁰ and

²⁸ *Catesby Estates Ltd. v. Steer* [2018] EWCA Civ 1697, paras. 25 and 26.

²⁹ MHCLG, *NPPF*, para. 213 and fn. 75.

³⁰ MHCLG, *NPPF*, para. 213.

- **Non-designated heritage assets.** Non-designated heritage assets are defined within the PPG as *"buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of significance meriting consideration in planning decisions, but which do not meet the criteria for designated heritage assets"*.³¹

Additionally, it is of course possible that sites, buildings or areas have no heritage significance.

There is no definitive grading system for assessing or categorising significance outside of the categories of Designated Heritage Assets and Non-Designated Heritage Assets, specifically with regards to the relative significance of different parts of an asset.

ICOMOS guidance recognises that a degree of professional judgement is required when defining significance:

*"...the value of heritage attributes is assessed in relation to statutory designations, international or national, and priorities or recommendations set out in national research agendas, and ascribed values. Professional judgement is then used to determine the importance of the resource. Whilst this method should be used as objectively as possible, qualitative assessment using professional judgement is inevitably involved."*³²

This assessment of significance adopts the following grading system:

- **Highest significance:** Parts or elements of a heritage asset, or its setting, that are of particular interest and are fundamental components of its archaeological, architectural, aesthetic or historic interest, and form a significant part of the reason for designation or its identification as a heritage asset. These are the areas or elements of the asset that are most likely to warrant retention, preservation or restoration.
- **Moderate significance:** Parts or elements of the heritage asset, or its setting, that are of some interest but make only a modest contribution to the archaeological, architectural, aesthetic or historic interest of the heritage asset. These are likely to be areas or elements of the asset that might warrant retention but are capable of greater adaption and alteration due to their lesser relative significance.
- **Low or no significance:** Parts or elements of the heritage asset, or its setting, that make an insignificant, or relatively insignificant contribution to the archaeological, architectural, aesthetic or historic interest of the heritage asset. These are likely to be areas or elements of the asset that can be removed, replaced or altered due to their minimal or lack of significance and are areas and elements that have

³¹ MHCLG, PPG, paragraph 039, reference ID: 18a-039-20190723.

³² International Council on Monuments and Sites (ICOMOS), *Guidance on Heritage Impact Assessment for Cultural World Heritage Properties* (Paris, January 2011), paras. 4-10.

potential for restoration or enhancement through new work.

Assessment of harm

Assessment of any harm will be articulated in terms of the policy and law that the proposed development will be assessed against, such as whether a proposed development preserves or enhances the character or appearance of a Conservation Area, and articulating the scale of any harm in order to inform a balanced judgement/weighting exercise as required by the NPPF.

In accordance with key policy, the following levels of harm may potentially be identified for designated heritage assets:

- **Substantial harm or total loss.** It has been clarified in a High Court Judgement of 2013 that this would be harm that would *"have such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced"*,³³ and
- **Less than substantial harm.** Harm of a lesser level than that defined above.

With regards to these two categories, the PPG states:

"Within each category of harm (which category applies should be explicitly identified), the extent of

the harm may vary and should be clearly articulated."³⁴

Hence, for example, harm that is less than substantial would be further described with reference to where it lies on that spectrum or scale of harm, for example low end, middle, and upper end of the less than substantial harm spectrum/scale.

With regards to non-designated heritage assets, there is no basis in policy for describing harm to them as substantial or less than substantial, rather the NPPF requires that the scale of any harm or loss is articulated whilst having regard to the significance of the asset. Harm to such assets is therefore articulated as a level of harm to their overall significance, using descriptors such as minor, moderate and major harm.

It is also possible that development proposals will cause no harm or preserve the significance of heritage assets. Here, a High Court Judgement of 2014 is relevant. This concluded that with regard to preserving the setting of a Listed building or preserving the character and appearance of a Conservation Area, *"preserving"* means doing *"no harm"*.³⁵

Preservation does not mean no change, it specifically means no harm. GPA:2 states that *"Change to heritage assets is inevitable but it is only harmful when significance is damaged"*.³⁶ Thus, change is accepted in Historic England's guidance as part of the evolution of the landscape and environment. It is whether such change is neutral, harmful or beneficial to the significance of an asset that matters.

³³ Bedford Borough Council v Secretary of State for Communities and Local Government [2013] EWHC 2847 (Admin), para. 25.

³⁴ MHCLG, PPG, paragraph 018, reference ID: 18a-018-20190723.

³⁵ R (Forge Field Society) v Sevenoaks District Council [2014] EWHC 1895 (Admin).

³⁶ Historic England, GPA:2, p. 9.

As part of this, setting may be a key consideration. When evaluating any harm to significance through changes to setting, this Report follows the methodology given in *GPA:3*, described above. Fundamental to this methodology is a consideration of “*what matters and why*”.³⁷ Of particular relevance is the checklist given on page 13 of *GPA:3*.³⁸

It should be noted that this key document also states:

“Setting is not itself a heritage asset, nor a heritage designation...”³⁹

Hence any impacts are described in terms of how they affect the significance of a heritage asset, and heritage interests that contribute to this significance, through changes to setting.

With regards to changes in setting, *GPA:3* states that:

“Conserving or enhancing heritage assets by taking their settings into account need not prevent change”.⁴⁰

Additionally, whilst the statutory duty requires that special regard should be paid to the desirability of not harming the setting of a Listed Building, that cannot mean that any harm, however minor, would necessarily require Planning Permission to be refused. This point has been clarified in the Court of Appeal.⁴¹

Benefits

Proposed development may also result in benefits to heritage assets, and these are articulated in terms of how they enhance the heritage interests, and hence the significance, of the assets concerned.

As detailed further in **Appendix 4** the *NPPF* (at Paragraphs 214 and 215) requires harm to a designated heritage asset to be weighed against the public benefits of the development proposals.⁴²

Recent High Court Decisions have confirmed that enhancement to the historic environment should be considered as a public benefit under the provisions of Paragraphs 214 to 216.⁴³

The *PPG* provides further clarity on what is meant by the term ‘public benefit’, including how these may be derived from enhancement to the historic environment (‘heritage benefits’), as follows:

“Public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the National Planning Policy Framework (paragraph 8). Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits, for example, works to a listed

³⁷ Historic England, *GPA:3*, p. 8.

³⁸ Historic England, *GPA:3*, p. 13.

³⁹ Historic England, *GPA:3*, p. 4.

⁴⁰ Historic England, *GPA 3*, p. 8.

⁴¹ *Palmer v Herefordshire Council & Anor* [2016] EWCA Civ 1061.

⁴² MHCLG, *NPPF*, paras. 214 and 215.

⁴³ Including – *Kay, R (on the application of) v Secretary of State for Housing Communities and Local Government & Anor* [2020] EWHC 2292 (Admin); MHCLG, *NPPF*, paras. 214 and 216.

private dwelling which secure its future as a designated heritage asset could be a public benefit.

Examples of heritage benefits may include:

- ***sustaining or enhancing the significance of a heritage asset and the contribution of its setting***
- ***reducing or removing risks to a heritage asset***
- ***securing the optimum viable use of a heritage asset in support of its long term conservation.***⁴⁴

Any "heritage benefits" arising from the proposed development, in line with the narrative above, will be clearly articulated in order for them to be taken into account by the decision maker.

⁴⁴ MHCLG, PPG, paragraph 020, reference ID: 18a-020-20190723.

Appendix 4: Legislative Framework

Legislation relating to the built historic environment is primarily set out within the *Planning (Listed Buildings and Conservation Areas) Act 1990*, which provides statutory protection for Listed Buildings and Conservation Areas.⁴⁵ It does not provide statutory protection for non-designated or Locally Listed heritage assets.

Section 66(1) of the Act states that:

“In considering whether to grant planning permission [or permission in principle] for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State, shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”⁴⁶

In the 2014 Court of Appeal judgement in relation to the Barnwell Manor case, Sullivan LJ held that:

“Parliament in enacting section 66(1) did intend that the desirability of preserving the settings of listed buildings should not simply be given careful consideration by the decision-maker for the purpose of deciding whether there would be some harm, but should be given “considerable importance and weight”

when the decision-maker carries out the balancing exercise.”⁴⁷

A judgement in the Court of Appeal (‘Mordue’) has clarified that, with regards to the setting of Listed Buildings, where the principles of the NPPF are applied (in particular paragraph 134 of the 2012 version of the NPPF, the requirements of which are now given in paragraph 215 of the current, revised NPPF, see **Appendix 5**), this is in keeping with the requirements of the 1990 Act.⁴⁸

With regards to development within Conservation Areas, Section 72(1) of the *Planning (Listed Buildings and Conservation Areas) Act 1990* states:

“In the exercise, with respect to any buildings or other land in a conservation area, of any powers under any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.”⁴⁹

Unlike Section 66(1), Section 72(1) of the Act does not make reference to the setting of a Conservation Area. This makes it plain that it is the character and appearance of the designated Conservation Area that is the focus of special attention.

⁴⁵ UK Public General Acts, Planning (Listed Buildings and Conservation Areas) Act 1990.

⁴⁶ UK Public General Acts, Planning (Listed Buildings and Conservation Areas) Act 1990, Section 66(1).

⁴⁷ Barnwell Manor Wind Energy Ltd v (1) East Northamptonshire DC & Others [2014] EWCA Civ 137. para. 24.

⁴⁸ Jones v Mordue [2015] EWCA Civ 1243.

⁴⁹ UK Public General Acts, Planning (Listed Buildings and Conservation Areas) Act 1990. Section 72(1).

In addition to the statutory obligations set out within the *Planning (Listed Buildings and Conservations Area) Act 1990*, Section 38(6) of the *Planning and Compulsory Purchase Act 2004* requires that all planning applications, including those for Listed Building Consent, are determined in accordance with the Development Plan unless material considerations indicate otherwise.⁵⁰

⁵⁰ UK Public General Acts, Planning and Compulsory Purchase Act 2004, Section 38(6).

Appendix 5: National Policy Guidance

The National Planning Policy Framework (December 2024)

National policy and guidance is set out in the Government's *National Planning Policy Framework (NPPF)* published in December 2024. This replaced and updated the previous *NPPF* (December 2023). The *NPPF* needs to be read as a whole and is intended to promote the concept of delivering sustainable development.

The *NPPF* sets out the Government's economic, environmental and social planning policies for England. Taken together, these policies articulate the Government's vision of sustainable development, which should be interpreted and applied locally to meet local aspirations. The *NPPF* continues to recognise that the planning system is plan-led and that therefore Local Plans, incorporating Neighbourhood Plans, where relevant, are the starting point for the determination of any planning application, including those which relate to the historic environment.

The overarching policy change applicable to the proposed development is the presumption in favour of sustainable development. This presumption in favour of sustainable development (the 'presumption') sets out the tone of the Government's overall stance and operates with and through the other policies of the *NPPF*. Its purpose is to send a strong signal to all those involved in the planning process about the need to plan positively for appropriate new development; so that both plan-making and development management are proactive and driven by a search for opportunities to deliver sustainable development, rather than barriers. Conserving historic assets in a manner appropriate to their significance forms part of this drive towards sustainable development.

The purpose of the planning system is to contribute to the achievement of sustainable development and the *NPPF* sets out three 'objectives' to facilitate sustainable development: an economic objective, a social objective, and an environmental objective. The presumption is key to delivering these objectives, by creating a positive pro-development framework which is underpinned by the wider economic, environmental and social provisions of the *NPPF*. The presumption is set out in full at paragraph 11 of the *NPPF* and reads as follows:

"Plans and decisions should apply a presumption in favour of sustainable development.

For plan-making this means that:

- a. all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;***
- b. strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:***
 - i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting***

the overall scale, type or distribution of development in the plan area; 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.*

For decision-taking this means:

- a. *approving development proposals that accord with an up-to-date development plan without delay; or*
- b. *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 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.”⁵¹

However, it is important to note that footnote 7 of the NPPF applies in relation to the final bullet of paragraph 11. This provides a context for paragraph 11 and reads as follows:

“The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 189) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75); and areas at risk of flooding or coastal change.”⁵² (our emphasis)

The NPPF continues to recognise that the planning system is plan-led and that therefore, Local Plans, incorporating Neighbourhood Plans, where relevant, are the starting point for the determination of any planning application.

Heritage Assets are defined in the NPPF as:

“A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage

⁵¹ MHCLG, NPPF, para. 11.

⁵² MHCLG, NPPF, para. 11, fn. 7.

assets and assets identified by the local planning authority (including local listing)."⁵³

The NPPF goes on to define a Designated Heritage Asset as a:

"World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under relevant legislation."⁵⁴

As set out above, significance is also defined as:

"The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site's Statement of Outstanding Universal Value forms part of its significance."⁵⁵

Section 16 of the NPPF relates to 'Conserving and enhancing the historic environment' and states at paragraph 208 that:

"Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on

a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal."⁵⁶

Paragraph 210 goes on to state that:

"In determining planning applications, local planning authorities should take account of:

- a. the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;***
- b. the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and***
- c. the desirability of new development making a positive contribution to local character and distinctiveness."***⁵⁷

With regard to the impact of proposals on the significance of a heritage asset, paragraphs 212 and 213 are relevant and read as follows:

"When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the

⁵³ MHCLG, NPPF, Annex 2.

⁵⁴ MHCLG, NPPF, Annex 2.

⁵⁵ MHCLG, NPPF, Annex 2.

⁵⁶ MHCLG, NPPF, para. 208.

⁵⁷ MHCLG, NPPF, para. 210.

asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.”⁵⁸

“Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

- a. grade II listed buildings, or grade II registered parks or gardens, should be exceptional;**
- b. assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.”⁵⁹**

Section b) of paragraph 213, which describes assets of the highest significance, also includes footnote 75 of the NPPF, which states that non-designated heritage assets of archaeological interest which are demonstrably of equivalent significance to Scheduled Monuments should be considered subject to the policies for designated heritage assets.

In the context of the above, it should be noted that paragraph 214 reads as follows:

“Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- a. the nature of the heritage asset prevents all reasonable uses of the site; and**
- b. no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and**
- c. conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and**
- d. the harm or loss is outweighed by the benefit of bringing the site back into use.”⁶⁰**

Paragraph 215 goes on to state:

“Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.”⁶¹

⁵⁸ MHCLG, NPPF, para. 212.

⁵⁹ MHCLG, NPPF, para. 213.

⁶⁰ MHCLG, NPPF, para. 214.

⁶¹ MHCLG, NPPF, para. 215.

The NPPF also provides specific guidance in relation to development within Conservation Areas, stating at paragraph 219 that:

“Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.”⁶²

Paragraph 220 goes on to recognise that “not all elements of a World Heritage Site or Conservation Area will necessarily contribute to its significance” and with regard to the potential harm from a proposed development states:

“Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 214 or less than substantial harm under paragraph 215, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.”⁶³ (our emphasis)

With regards to non-designated heritage assets, paragraph 216 of NPPF states that:

“The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.”⁶⁴

Overall, the NPPF confirms that the primary objective of development management is to foster the delivery of sustainable development, not to hinder or prevent it. Local Planning Authorities should approach development management decisions positively, looking for solutions rather than problems so that applications can be approved wherever it is practical to do so. Additionally, securing the optimum viable use of sites and achieving public benefits are also key material considerations for application proposals.

National Planning Practice Guidance

The then Department for Communities and Local Government (now the Ministry of Housing, Communities & Local Government (MHCLG)) launched the planning practice guidance web-based resource in March 2014, accompanied by a ministerial statement which confirmed that a number of previous planning practice guidance documents were cancelled.

This also introduced the national Planning Practice Guidance (PPG) which comprised a full and consolidated review of planning practice guidance documents to be read alongside the NPPF.

⁶² MHCLG, NPPF, para 219.

⁶³ MHCLG, NPPF, para. 220.

⁶⁴ MHCLG, NPPF, para. 216.

The PPG has a discrete section on the subject of the Historic Environment, which confirms that the consideration of ‘significance’ in decision taking is important and states:

“Heritage assets may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a heritage asset, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals.”⁶⁵

In terms of assessment of substantial harm, the PPG confirms that whether a proposal causes substantial harm will be a judgement for the individual decision taker having regard to the individual circumstances and the policy set out within the NPPF. It goes on to state:

“In general terms, substantial harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset’s significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting.

While the impact of total destruction is obvious, partial destruction is likely to have a considerable

impact but, depending on the circumstances, it may still be less than substantial harm or conceivably not harmful at all, for example, when removing later inappropriate additions to historic buildings which harm their significance. Similarly, works that are moderate or minor in scale are likely to cause less than substantial harm or no harm at all. However, even minor works have the potential to cause substantial harm.”⁶⁶ (our emphasis)

National Design Guide:

Section C2 relates to valuing heritage, local history and culture and states:

“When determining how a site may be developed, it is important to understand the history of how the place has evolved. The local sense of place and identity are shaped by local history, culture and heritage, and how these have influenced the built environment and wider landscape.”⁶⁷

“Sensitive re-use or adaptation adds to the richness and variety of a scheme and to its diversity of activities and users. It helps to integrate heritage into proposals in an environmentally sustainable way.”⁶⁸

It goes on to state that:

“Well-designed places and buildings are influenced positively by:

⁶⁵ MHCLG, PPG, paragraph 007, reference ID: 18a-007-20190723.

⁶⁶ MHCLG, PPG, paragraph 018, reference ID: 18a-018-20190723.

⁶⁷ MHCLG, NDG, para. 46.

⁶⁸ MHCLG, NDG, para. 47.

- *the history and heritage of the site, its surroundings and the wider area, including cultural influences;*
- *the significance and setting of heritage assets and any other specific features that merit conserving and enhancing;*
- *the local vernacular, including historical building typologies such as the terrace, town house, mews, villa or mansion block, the treatment of façades, characteristic materials and details – see Identity.*

*Today's new developments extend the history of the context. The best of them will become valued as tomorrow's heritage, representing the architecture and placemaking of the early 21st century."*⁶⁹

⁶⁹ MHCLG, NDG, paras. 48–49.

Appendix 6: Relevant Development Plan Policies

Applications for Planning Permission and Listed Building Consent where relevant, within Wokingham are currently considered against the policy and guidance set out within the Wokingham Borough Core Strategy Development Plan which was adopted in September 2010 and also the Wokingham Borough Managing Development Delivery Document (Local Plan) which was adopted in February 2014.

Wokingham Borough Core Strategy Development Plan

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. Development proposals will be required to demonstrate how they have responded to the above criteria through the submission of Design and Access Statements, clear and informative plans, elevations and street scenes and where required Masterplans, Development Briefs, Concept Statements and Design Codes.

Wokingham Borough Managing Development Delivery Document

Policy TB24: Designated Heritage Assets (Listed Buildings, Historic Parks and Gardens, Scheduled Ancient Monuments and Conservation Areas)

1. Historic Parks and Gardens, Scheduled Monuments and Conservation Areas are shown on the Policies Map.
2. The Borough Council will conserve and seek the enhancement of designated heritage assets in the Borough and their settings by:
 - a. Requiring works to or affecting heritage assets or their setting to demonstrate that the proposals would at least conserve and, where possible enhance the important character and special architectural or historic interest of the building, Conservation Area, monument or park and garden including its setting and views.
 - b. Supporting development proposals or other initiatives that will conserve and, where possible, enhance the local character, setting, management and historic significance of designated heritage assets, with particular support for initiatives that would improve any assets that are recognised as being in poor condition or at risk.

3. Proposals for building works shall retain or incorporate existing features or details of historic or architectural significance or design quality into the scheme.

Policy TB25: Archaeology

1. Areas of high archaeological potential are shown on the Policies Map.

2. In areas of high archaeological potential, applicants will need to provide a detailed assessment of the impact on archaeological remains.

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

Policy TB26: Buildings of Traditional Local Character and Areas of Special Character

1. Areas of Special Character are shown on the Policies Map.

2. Planning permission will only be granted for proposals to or affecting Buildings of Traditional Local Character and Areas of Special Character where they demonstrate that they retain and enhance the traditional, historical, local and special character of the building or area and its setting.

3. Proposals that involve the demolition of a Building of Traditional Local Character will require strong justification.



Appendix 7: Approved Parameter Plans

Planning (Listed Buildings and Conservation Areas) Act 1990
Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

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