

DELEGATED OFFICER REPORT



WOKINGHAM
BOROUGH COUNCIL

Application Number:	243099
Site Address:	Land North Of Reading Road, Arborfield
Expiry Date:	11 March 2025
Site Visit Date:	18.12.2024 & 14.03.2025
Proposal: Outline application for the proposed erection of up to 111 no. dwellings with associated works, parking, landscaping, publicly accessible open space and access from Reading Road. (All matters reserved except for means of access.)	

PLANNING CONSTRAINTS/STATUS

Green Routes and Riverside Paths
Affordable Housing Thresholds
Bat Roost Habitat Suitability
Scale and Location of Development Proposals
Great Crested Newt Consultation Zone
Ground Water Zones
Tree Preservation Orders
SSSI Impact Risk Zones
Thames Basin Heaths SPA Mitigation Zones
Green Routes and Riverside Paths Consultation Zone
Main Rivers DRN Consultation Zone
Ordinary Watercourses Consultation Zone
Historic Flooding Points Consultation Zone
Archaeological Sites Consultation Zone
Historic Flooding Points
Main Rivers DRN
Great Crested Newt Consultation Zone Householder

PLANNING POLICY

National Policy	National Planning Policy Framework (NPPF) National Planning Policy Guidance (NPPG)
Core Strategy (CS)	CP1 – Sustainable Development CP2 – Inclusive Communities CP3 – General Principles for Development CP4 – Infrastructure Requirements CP5 – Housing Mix, Density and Affordability CP6 – Managing Travel Demand CP7 – Biodiversity CP8 – Thames Basin Heaths Special Protection Area CP9 – Scale and Location of Development Proposals CP11 – Proposals Outside Development Limits CP17 – Housing Delivery
MDD Local	CC01 – Presumption in Favour of Sustainable Development CC02 – Development Limits

Plan (MDD)	CC03 – Green Infrastructure, Trees and Landscaping CC04 – Sustainable Design and Construction CC05 – Renewable Energy and Decentralised Energy Networks CC06 – Noise CC07 – Parking CC09 – Development and Flood Risk CC10 – Sustainable Drainage TB05 – Housing Mix TB07 – Internal Space Standards TB08 – Open Space, Sport and Recreational Facilities Standards TB12 – Employment Skills Plan TB21 – Landscape Character TB23 – Biodiversity and Development TB24 – Designated Heritage Assets TB25 – Archaeology
Emerging Local Plan Update	SS1 Sustainable development principles SS2 Spatial strategy and settlement hierarchy SS4 Development within or adjacent to minor settlements SS5 Development in the countryside SS10 Meeting our housing needs SS13 Loddon Valley Garden Village SS15 Securing infrastructure CE1 Design principles for efficient buildings CE3 Environmental standards for residential development CE4 Supporting a circular economy CE5 Embodies carbon C1 Active and sustainable transport and accessibility C2 Mitigation of transport impacts and highway safety and design C3 Active travel C4 Green and blue infrastructure and public rights of way C8 Utilities ER4 Employment and skills plans H1 Housing mix, density and standards H3 Affordable housing FD1 Development and flood risk (from all sources) FD2 Sustainable drainage FD3 River corridors and watercourses NE1 Biodiversity and geodiversity NE2 Biodiversity net gain NE3 Thames Basin Heaths Special Protection Area NE4 Trees, woodland, hedges and hedgerows NE5 Landscape and design DH1 Place making and quality design DH2 Safeguarding amenity DH5 The historic environment DH6 Archaeology HC1 Promoting healthy communities HC4 Open spaces, sports, recreation and play facilities HC5 Environmental protection HC7 Light pollution

	HC8 Noise pollution
Other	Borough Design Guide Supplementary Planning Document CIL Guidance + 123 List Affordable Housing Supplementary Planning Document Sustainable Design and Construction Supplementary Planning Document Arborfield and Newland Village Design Statement Arborfield and Barkham Neighbourhood Plan

PLANNING HISTORY

Application No.	Description	Decision & Date
TP/2001/3728	Proposed temporary permission for use of land as a construction yard.	Refused: 15 June 2001
F/2002/7111	Proposed formation of angling pond with bunds.	Approved: 09 April 2003
VAR/2005/4389	Proposed variation to condition 12 of consent F/2002/7111 to allow a reduction to the visibility splays.	Approved: 24 May 2005
F/2006/7933	Proposed infilling of angling pond and re-grading of the land.	Approved: 19 October 2006
C/2012/0280	Application for submission of details to comply with conditions 3 and 5 of planning consent F/2006/7933. 3. Restoration Scheme. 5. Planning and maintenance scheme.	Approved: 15 May 2012

CONSULTATION RESPONSES

Internal

WBC Planning Policy – Objection
WBC Landscape and Trees – Objection
WBC Drainage - No objection subject to conditions
WBC Highways – No objection regarding highway safety
WBC Built Heritage Officer – No objection
WBC Affordable Housing – No objection subject to a Legal Agreement.
WBC Ecology – Further information required
Nature Space – Further information required
NHS – more medical floor space is required

External

Thames Valley Police – No objection
The Environment Agency – Objection
Berkshire Archaeology – No objection
Royal Berkshire Fire and rescue – Advisory information

REPRESENTATIONS

Parish/Town Council	Arborfield & Newland Parish Council object for the following reasons:
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	The application is a speculative proposed development out of keeping with the locality and development of a greenfield site outside the settlement boundary. The development offers nothing in the way of additional infrastructure or benefit to the local community and brings additional issues to the village locality with respect to traffic volumes and stresses on current services. This planning application tries to circumvent, through timing, the implementation of the new Local Plan Update which is currently in process. The planning statement with this proposed development makes the admission that the development doesn't meet a number of the core planning policy criteria which is further indicative of a speculative planning application. The proposed development fails to meet the policies of the Arborfield and Barkham Neighbourhood Plan as detailed below: IRS02 – Recognise, respect and preserve identity and rural nature of settlement - this proposed site fails to preserve the nature of the rural identity of the village by building on green fields that define the rural nature of the village. It fails to respect the green fields in and around the village in its entirety as the proposed development sits on green fields outside the settlement boundary. IRS04 — Protection and enhancement of the historic character of the area – the proposed development makes no attempt to address this policy and the proposed 111 properties being out of keeping with the historic nature of the area. TC2 – Properly planned and designed new facilities – the development fails to offer any new facilities for the local area of any kind. AD1 – New development within development limits – the development fails to meet any of the criteria for this policy in that this is solely a green field development outside the settlement boundary of Arborfield. GA1 – Minimise additional traffic on unsuitable roads – the proposed development will add additional vehicle movement to local roads. GA3 – Public transport improvements and long-term viability – the proposed development shows no intent to improve local public transport. The village is served by a daytime bus route
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	which links to Reading and to Wokingham, but buses are infrequent and poorly routed for most required services. The proposed development fails to meet the Wokingham Borough Council's Core Planning Policies as shown below: CP1 – Sustainable Development 7) This development site sits wholly on greenfield agricultural land outside the settlement boundary of Arborfield. 11) Demonstrate how they support opportunities for reducing the need to travel, particularly by private car in line with CP6 – the development relies solely on the use of cars, the local bus routes are poor and not directly linked with this site, which would push most residents to opt for the car as their primary source of transport. CP2 – Inclusive communities – the development fails to meet any of the core principle of inclusive communities and offers nothing to the local community and, in fact, relies solely on the link to the local community infrastructure while adding or offering nothing of value in return. CP3 – General Principle for development a) Are of an appropriate scale of activity, mass, layout, built form, height, materials and character to the area – the massing of this site is completely at odds with the size of Arborfield village. Currently the village has circa 87 properties and the development proposes to add another 111 properties which would be an increase of over 100% in the size of the village and unsustainable for the facilities currently in the village. h) Contribute towards the provision of an appropriate sustainable network of community facilities - the proposed development offers no additional facilities to the community but solely relies on those already in place to provide for the development. CP6 – Managing Travel demand a) Provide for sustainable forms of transport to allow choice - the proposed development offers little in the way in terms of choice for residents. There is a bus service through the village, but this is limited to daytime travel and not well connected with local towns and centres. This development relies solely on the use of cars to and from the site with alternative forms of transport given little thought. c) Improve the existing infrastructure network, including road, rail and public transport, enhance facilities for pedestrians and cyclists - the development offers no improvements to the infrastructure network locally, with only additions to facilities being for entry and exit to the site and altering the present network to add only benefit to the proposed development. CP9 – Scale and location of development proposals. 3) The limited development locations of Arborfield – the proposed development sits wholly outside the settlement boundary of Arborfield but relies completely on the settlement to provide justification for its development. Arborfield is designated as an area of limited development
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	due to the levels of facilities and services and this development would put an additional 111 properties to the village which only consists of approximately 87 properties an increase of over 100% and offering no improvement to services or facilities currently in place. The proposed development would create an unsustainable site relying solely on the facilities already in place. CP11 - Proposals outside Development Limits (including countryside) 2) It does not lead to excessive encroachment or expansion of development away from the original buildings - the development fails to meet this policy in all facets of the development. It is a greenfield development outside the settlement boundary. CP18 - Arborfield Garrison Strategic Development Location As note to CP18, this proposed development site outside the Arborfield Garrison SDL but, as with many other previous refused applications, tries to imply the use of the facilities and its location close to the SDL as part of the reasoning for planning approval.
Ward Member(s)	Councillor Joseph Barley: The application is outside of settlement boundaries in land designated as countryside, it is out of keeping with the rural nature of Arborfield. The site has not been allocated for residential development in the regulation 19 LPU and its proximity to both the proposed Loddon Valley Garden Village and Arborfield Cross would shrink the future strategic gap between the two settlements from 1,000m to 550m. Whilst the Loddon Valley Garden Village is yet to be built, the current administration at Wokingham Borough Council's continuing commitment to an SDL at Hall Farm means that it is extremely unlikely that the Loddon Valley Garden Village will not be built. A reduction of nearly 50% in the future strategic gap is a major erosion of the separation between the settlements. If this site did not erode the separation, then the boundary of the LVGV SDL would not have been agreed to extend no further than its proposed boundary at Church Lane. Given the Local Plan is at a late stage and approaching adoption, WBC's issue of providing housing supply will be resolved, and both these points should be given greater weight by the officers. The site also contradicts the spatial strategy of the Arborfield and Barkham Neighbourhood Plan. This development would harm the character and appearance of the countryside through the loss of open fields through its replacement with a housing development and associated roads and infrastructure. The development would contradict the purposes of the Arborfield Cross Traffic Calming Measures. These were introduced to discourage traffic from driving through Arborfield Cross via Reading / Eversley Road. This site is directly on Reading Road and driving on it from the site straight through Arborfield Cross would be the only

	suitable way for future residents to access nearby services. Related to the topic of nearby services, this application fails to promote active travel and public transport as it takes 36 minutes to travel by bus to Wokingham from the site, almost double what WBC defines as good service. The increased traffic movements, of which would likely be far into the hundreds, having to weave around Arborfield's traffic islands, would make it more unsuitable for cycling and walking. The pavement between the site is extremely thin and completely unsuitable for disabled persons and children, it takes just over 15 minutes to reach Arborfield Cross where there are limited services available. The site is a 45-minute walk away from the Arborfield Green Community Centre site which is much further than what is considered acceptable. The above information, existing evidence and documentation supplied by the applicant shows that this application at the very least would violate SS1, SS2, SS3, SS4, SS5, SS13, SS15, C1, C2 and C3 of the Regulation 19 Local Plan Update and CP1, CP3, CP4, CP6, CP9 and CP11 of the Core Strategy Development Plan and its numerous related strategic policies of the Managing Development Delivery Local Plan.
Neighbours	35 objections received which are summarised as follows: • Out of character • The proposed development is not keeping with existing houses • Overdevelopment • It would be high density out of keeping with the area • This along with other development is destroying the area • Eroding the countryside which is slowly disappearing • Unsustainable location • The National Planning Policy Framework (NPPF) states that permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions, taking into account any local design standards or style guides in plans or supplementary planning documents. This application fails to meet this on a number standings • The footpath along Reading Road is insufficient in width • This will exacerbate flooding that has caused Church Lane to flood • The water treatment plant on the Reading Road, Arborfield has no spare capacity, in fact the overload is a negative figure in excess of 15,000 units according

	to the LPU Regulation 19 document prepared by WBC and covers an amber warning. • Future home owners would be reliant on cars • Insufficient water and electricity utilities • The development will exacerbate existing flooding on the site • The site suffers from a lot of standing water after heavy rainfall • Loss of wildlife that use the site • Exacerbate existing traffic congestion • Lack of dentist and doctors in the area • Medical facilities in the area are overwhelmed • Loss of privacy to neighbouring houses • There is an agricultural tie protecting the land • There has already been significant development in the area • Impact on the environment • Loss of wildlife • There are no local school or doctor places • Increase in traffic • This proposal does not form part of the local strategic plan • It will undermine the local plan • Additional medical facilities are needed • Loss of Green Infrastructure • Loss and impact on trees • The proposal does not consider historical flooding • 111 dwellings is quite a dense use of the available land • 2 ½ storey dwelling will be out of keeping with the area • Lack of amenities in the area • There is not a footpath along the entirety of the Reading Road for safe walking to school or the village for shopping • Impact on neighbours privacy • The site was discounted from the Local Plan Update • The development will increase pollution • The development should be on a brownfield site • The purpose of the Local Plan Update is to stop speculative applications.
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APPRAISAL

Site Description:

The site is within the countryside and is not related to any defined settlement. The immediate area is characterised by paddocks and fields with pockets of linear development along the roads. The site is detached by open fields and agricultural land from the small village of Arborfield Cross to the southeast, which is the nearest defined

settlement. Whilst the site is within the parish of Arborfield, there is no cohesive settlement in the locality of the site.

To the north are rear gardens of a row of low-density housing that fronts onto Church Lane and pockets of paddocks and fields. Church Lane is a single-track road with strong rural characteristics and two heritage assets (St Bartholomew's Church and The Old Rectory). To the east is open land associated with a neighbouring farm. To the south is Reading Road and there is a small group of seven houses along part of this road. Further south there is a small cul-de-sac called Walden Avenue along with open undeveloped land and fields.

Reading Road to the south is a two-lane highway. Other roads in the vicinity are generally single track with limited no/limited footpath or street lighting (such as Church Lane) and are typical of rural areas detached from settlement limits within the countryside.

The site itself comprises of a mixture of fields and paddocks with various habitats include different types of scrub and grassland. There are trees and hedgerows along some of the field boundaries and water course runs across the western part of the site and the southern boundary.

Principle of Development:

The starting point for decision making is the development plan. Section 70[2] of the TCPA 1990 & 38[6] of the PCPA 2004 states that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise.

Paragraph 17 and 20 of the NPPF state the development plan must include strategic policies to address each local planning authority's priorities and an overall strategy for the pattern, scale and quality of development. In this case the adopted development plans for the area is the Core Strategy and MDD Local Plan. Alongside these are the Arborfield Neighbourhood Plan and the Local Plan Update (LPU), which is currently at Regulation 22 stage.

Core Strategy and MDD Local Plan

The Core Strategy and MDD Local Plan sets out the vision for the borough and the policies to achieve those objectives. The core spatial strategy has been informed through the Local Plan process with the engagement of the community. A priority of the development plan is steer new housing to the most sustainable locations within settlement boundaries and limit development within the countryside. This is, among other things, in order to promote sustainability, maintain the quality of the environment, protect the separate identity of settlements and provide certainty regarding how the borough will developed. It is also well-explained in the Borough Design Guide at pages 6 -7.

Policy CP9 of the Core Strategy and CC02 of the MDD Local Plan states that proposals will be permitted within development limits where the scale of the application reflects the facilities and services within the settlement.

The settlements are split into categories depending on the sustainability of those locations; Major, Modest and Limited development locations. The development plan steers Major developments to sustainable Major settlements with the best services, facilities and infrastructure. The definition of development limits recognises the consistent approach in planning to identify appropriate and sustainable areas for development. The application site is not within any of the tiered settlement limits and is within the countryside, thus conflicting with CP9 in principle.

The objection regarding the location of the site goes beyond being outside of settlement limits and in the countryside as in addition, the site would not adjoin any of the tiered settlement limits and is appreciably detached from and outside of the nearest defined settlement called Arborfield Cross.

Further, the scale of development is significantly excessive in relation to the limited services and facilities in Arborfield Cross, even if the site was within those settlement limits. Arborfield Cross is ranked as Limited Development location which is the lowest settlement hierarchy for sustainability. The Core Strategy sets out that the development within Limited Development locations should generally not exceed 25 dwellings. Therefore even if the site was within the development limits of the village, the 111 dwellings proposed would significantly exceed the scale of development identified as suitable for this small village and the limited range of facilities and services within it.

The groups of mainly linear development in the immediate area are known as Arborfield. This is not recognised a defined settlement in the development plan as they are not physically or socially cohesive and does not contain day-to-day facilities and services. The proposed quantum and scale of development would result in a significant and detrimental change to the character and appearance of this rural area that is out of keeping with the existing small groups of mainly linear development.

Policy CP11 refers to development within the countryside and states '*in order to protect the separate identity of settlements and maintain the quality of the environment, proposals outside of development limits will not normally be permitted*', except for the exceptions listed. The clear starting point is therefore that development outside of these limits should not normally be permitted. The proposal does not fall within any of the exceptions set out in CP11 and conflicts with this development plan policy.

The site has never been allocated for development. The site is neither a draft allocation in the Local Plan Update as it was considered unsuitable for development in Housing and Economic Land Availability Assessment (HELAA) (this is addressed further in a separate LPU sub-heading)

In summary, the application site is outside of development limits and within the countryside and is therefore inappropriate in principle for new residential development. This conflict with the development plan is however significantly exacerbated in this case by the scale of development proposed and the substantial detachment from any established settlement limits. The breach of settlement limits and conflict with the spatial strategy is therefore not minor or small, it is considerable when considering the scale of development and the spatial location of the site – it is not a natural extension to any settlement.

Arborfield Neighbourhood plan:

The Arborfield and Barkham Neighbourhood Plan was made on 22nd April 2020 and forms part of the development plan.

Policy AD1 refers to locating development within development limits and the detachment of the site from any development limits would not be supported by this policy and the broad strategy of the NP. The policy steers new housing to within settlement limits with a preference to Brownfield Land and the proposal would therefore fail to meet the requirements of this policy.

The proposal would also conflict with NP policies IRS1 and IRS2 due to an urbanisation of the countryside character and appearance, and the excessive scale of development in respect of the rural area away from established settlement limits. This will be considered in greater detail in the Landscape and Quantum, Scale and Design section of this report.

Local Plan Update:

The Local Plan Update (LPU), the plan which will supersede the Core Strategy and MDD Local Plan, has been submitted to the Secretary State for examination and is a Regulation 22 stage.

The application site comprises three of the sites that were promoted to the council for future development (5AR001, 5AR003 and 5AR005). It was not carried forward into the draft strategy. The site, along with a group of sites surrounding it, was discounted after the early stages of assessment in The Housing and Economic Land Availability Assessment (HELAA) (2021) because it is *'detached from settlement boundary and does not meet any of the exception criteria'*. The Planning Policy Team also confirm that the site was not proposed for allocation at any stage of local plan preparation.

Given the stage of preparation (LPU has not been examined) and outstanding responses exist to key spatial policies, the overall draft strategy is considered to have limited weight in determining the spatial approach to the location of new housing at this time. It must also be recognised that the assessment of land in the HELAA is high level with the purpose of informing options within the plan-making process. It is not comparable to a planning application, however, it is nonetheless useful in providing an understanding as to how the site is viewed in context of plan-making and highlights the obvious inappropriate spatial location of the site for a major housing development.

As part of the LPU, the Loddon Valley Garden Village site allocation is located to the north-west of the application site, north of Church Lane. The Planning Policy Team have advised that the site would not logically relate to this allocation and stated:

'given the distances involved and the presence of large detached properties set within substantial private plots that front Church Lane directly to the west and the north, it is not considered that development along this part of Reading Road would provide a logical visual or spatial extension the LVGV development. The

application site is proposed to remain in the countryside in the emerging local plan.'

The site is therefore intended to remain outside of settlement limits and in the countryside and unsuitable for housing development in the Draft Local Plan Update.

Conclusion on principle of development:

The location of this unplanned development on a greenfield site in the countryside is unacceptable in principle due to the countryside location outside of settlement boundaries; it's appreciably detachment from any recognised settlement boundary; and, the quantum of development that would be substantially out of scale even if it were located within the nearest small village. The development conflicts with the spatial objectives of the development plan and policies CP1, CP2, CP3, CP6, CP9 and CP11 of the Core Strategy, CC01, CC02 and TB21 of the MDD Local Plan, policies IR1 & IR2 and AD1 of the Arborfield and Barkham Neighbourhood Plan, the Borough Design Guide SPD and sections 2, 4, 8, 9, 12 and 15 of the NPPF.

Housing Land Supply:

The NPPF (Dec 2024) at paragraph 78 requires LPAs to identify a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than 5 years old. The latest published Five-Year Housing Land Supply Statement (at 31st March 2023) shows the Council is currently able to demonstrate 1.7 years' worth of deliverable sites. Subsequently, those policies relating specifically to housing delivery in the borough's Core Strategy and MDD LP (and any made Neighbourhood Plans) are currently considered to be out of date. This does not mean they have no weight, but an assessment of consistency will take place throughout this application.

Paragraph 11 of the NPPF states that plans and decisions should apply a presumption in favour of sustainable development. For decision-taking this means that where policies which are most important for determining the application are out-of-date, permission should be granted unless:

- the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or
- 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

Firstly, in considering i), it must be recognised that the proposed site is located within a 5km zone of Thames Basin Heath Special Protection Area any protected areas or assets of particular importance (as outlined above and within footnote 7 and paragraph 195 of the NPPF). The implications for the proposal of this are discussed later in this report.

In considering ii), officers must assess as part of any forthcoming application whether there are any adverse impacts generated by the development that 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. This is referred to as the 'tilted balance,' as harm and benefits are not weighed equally, but tilted according to paragraph 11(d)(ii).

In acknowledging the requirements of paragraph 11(d)(ii) and the titled balance being engaged, it is necessary to consider whether there are any circumstances which affect the weight that can be given to the supply of additional housing.

An important underlying reason in the context of Wokingham Borough is the historic oversupply of housing against both the requirement set in the Core Strategy local plan and the scale of local housing need as calculated by the previous standard method which remains a key contributing factor to the current lack of the required deliverable housing land supply and this must be considered in the planning balance section at the end of the report. The latest Housing Delivery Test results were published in December 2024. The performance of Wokingham Borough was 169% and the performance of Wokingham Borough has exceeded 100% in every set of published results.

Having established the tilted balance is engaged, Paragraph 11d(ii) requires the proposal to be considered against the policies of the NPPF taken as a whole, with particular regard to the issues set out.

Agricultural Land Classification:

Policy CP1 states development should avoid areas of best and most versatile agricultural land. NPPF para 187 also states that decisions should contribute to and enhance the natural and local environment by '*recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland*'.

Best and most versatile agricultural land is defined as land in grades 1, 2, and 3a of the Agricultural Land Classification. The agricultural land is classed as grade 3 from Natural England data but it does not differentiate between grades 3, 3a or 3b.

After submission, the applicant submitted an Agricultural Land Classification report in April 2025, which shows a mix of agricultural grades on the site including 3a on the western section, with other parts being lower quality 3b, 4 and 5. Notwithstanding, the proposed development will result in the loss of agricultural land, which comprises of some 3a quality and therefore conflicts with policy CP1 of the Core Strategy and NPPF para 87.

Landscape impact on character and appearance of the area:

Policy

Policy CC02 of the MDD Local Plan reinforces the development limits of each settlement area stating that *'planning permission for proposals on the edge of settlements will only be granted where they can demonstrate that the development, including boundary treatments, is within development limits'*. Policy CC03 states that development should promote the integration of the scheme with any adjoining public space or countryside and proposals that result in the loss, fragmentation or isolation of areas of green infrastructure will not be acceptable.

Policy CC03 states that development should not result in the loss of Green Infrastructure and countryside is included within this definition.

Policy TB21 of the MDD Local Plan states that proposals must demonstrate how they have addressed the requirements of the Council's Landscape Character Assessment (LCA), including the landscape quality; landscape strategy; landscape sensitivity and key issues and proposals shall retain or enhance the condition, character and features that contribute to the landscape.

LPU policy NE5 states that *'development proposals will be supported where they adopt a landscape led approach which protects and enhances the character and distinctiveness of landscapes'*.

NPPF para180 states that *'policies and decisions should contribute to and enhance the natural and local environment by... b) recognising the intrinsic character and beauty of the countryside'*. It refers to both 'decisions', and 'policies'. Therefore, whilst it can be applied directly in the determination of the application, it also feeds through into the relevant development plan policies.

Guidance

The site itself is almost equally split between two landscape characters areas; C1 and J2, although most of the site to the east is within J2.

Key characteristics of this area include arable farm land, with pasture on higher ground and horse paddocks; older scattered settlement of farms, hamlets and small nucleated villages at Barkham and Arborfield Cross; roads rural in character; and a rural character away from development and roads.

The Valuable Landscape Attributes of LCA J2 are; Barkham Brook and associated wetland which provide important ecological habitats including wet meadow and BAP priority habitat wet woodland, pattern of arable and pastoral fields, which provides a rural character away from settlement, and creates an important separation between settlements. Mature hedgerow trees and in-field trees, wooded character and visual interest within the landscape. Rural settlement pattern of farms, hamlets and small nucleated villages outside the urban area which provides a rural character and a link to the past. Recreational value of the network of rights of way between settlements. Views across the landscape across the river valleys to the west and to the wooded hills to the north and south provides a loose sense of enclosure.

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

Key issues for the area identified in the LCA are pressure for large scale residential development and supporting infrastructure impacting landscape character; continuing pressure for new roads and light pollution.

The Landscape Strategy is to conserve and enhance the remaining rural character of the landscape. The key aspects to be conserved and enhanced are the field pattern with mature hedgerow trees, wetland and woodland habitats, rural lanes and historic features. Landscape Guidelines include; conserve woodlands including ancient and remnant standard trees. *Conserve the open rural qualities of the farmed landscape.*

The key characteristics of the C1 Arborfield LCA (the west side of the site) include; valued for farming, water features; ponds, streams, drainage channels, and field boundaries marked with post and wire fencing, some gappy hedges, tree lined narrow lanes, tracks and byways, as well as wooded copses which contribute to the rural character, a sense of remoteness and low density settlement character. Most of these features are recognised as the Valuable Landscape Attributes of the C1 LCA.

Key issues for the C1 LCA include; loss of hedgerows and hedgerow trees, from intensification of agriculture and fields and decline in hedgerow management, loss of structure and species diversity of the traditionally coppiced woodlands, lack of recruitment of young trees, effects on tree health/species composition of woodland and wet woodland. Demand for residential and commercial development is impacting the tranquil character of the area.

The *Landscape Strategy* is to conserve and enhance the quiet, rural and agricultural landscape with its scattered rural settlement and rural lanes.

Landscape Guidelines include; conserve and enhance small woodlands, increase deciduous woodland and hedgerow planting. Conserve the open qualities of the landscape and to reinstate and repair hedgerows with native species. Maintain the sparse settlement pattern of Arborfield.

Assessment

The development would result in a significant incursion of built form outside of development limits and into the countryside on existing undeveloped open fields/paddocks. The proposed development will harm the character and appearance of the countryside by reason of the loss of the open fields and replacing this with an urbanising housing development functionally detached from any defined settlement.

The site is not located next to any settlement limits and would be seen as a large, incongruous housing development isolated from any defined settlements. The appreciable detachment from any settlement centre is compounded by the scale of

development, which appreciably exceeds the small incremental growth of Arborfield Cross and the small linear development that has occurred along some existing roads in the locality.

The negative impact of the development would not fade overtime, unlike a proportionate development within a defined village that would eventually assimilate into the established settlement. The scale and detachment away from any defined village centre would result in the development being perceived as an anomalous housing estate alien to the rural surroundings and the immediate context. Whilst there are houses in the vicinity of the site these have been built in small increments in a typically linear fashion and the proposal would have no resemblance of this both in a spatial sense and scale/quantum.

Whilst it is well established that consideration of the landscape character is not reliant on public or third-party views, the proposed development and associate impact would be seen and perceived by numerous receptors.

The site is readily visible from Reading Road. Whilst there are trees and hedges along the road these are intermittent and deciduous, making the surrounding agricultural fields more open in winter months. There would be direct views of the development through the new access road onto Reading Road and the development would be seen to the east and west of the access road. The fields to the south-east are open and the development would be perceptible from some views across this field and Lockey Farm. There are several properties that will back into the application and the development would be perceivable from these sensitive receptors. The development would also be perceivable from the paddocks and equestrian uses that would still be adjacent to parts of the site.

Given the surrounding rural context, this large enclave of residential development would appear very jarring from in the context of the rural character and appearance of the area.

Whilst there are residential dwellings in the locality, they do not form a cohesive settlement and are disparate pockets of development. These broadly comprises of groups of liner rural development along roads and country lanes. Church Lane to the north comprises of low density detached houses along a narrow rural lane. There is a small cul-de-sac built prior to 1960 called Walden Avenue which has not expanded for the last 65 years.

The proposed development would negatively add to this disparate character of development separated by pockets of fields and open areas. The large scale of the proposed development would create an illegible residential estate with no defined centre or sense of place, and unrelated to the nearest defined village.

The indicative parameters of the development would also result in it boarding onto open fields and paddocks creating fragmented pockets of open land and failing to create any cohesive pattern of development. This would be particularly acute on the eastern and western fringes of the developable areas.

The LVIA submitted does not fully assess the impact and it is not clear what the sensitivity of the receptors are or what the magnitude of change is considered to be in this document. Whilst it does not go into detail, the conclusion in LVIA does acknowledge there would be an impact, which can only be presumed to be a negative one.

The council's Tree and Landscape Officer has objected to the development stating:

'The proposals do not maintain rural character and settlement pattern of Arborfield or avoid the spread of development in the area. The proposals do not conserve the open and rural qualities of the farmed landscape that provides a physical and visual separation or gap between settlements, and fails to conserve and protect the landscape pattern of mixed pasture and arable fields.'

As stated, due to the scale, quantum and spatial location that is unrelated to existing settlement limits, the impact on the landscape and character & appearance of the area would be significant.

In addition to the above, it appears that suitable visibility splays could only be achieved by the removal of additional trees, which include a category B oak Tree (T14). This is considered further in the Highway Safety section of this report, but this would further impact the character and appearance of the area.

In summary, the proposed development will have a negative and detrimental impact on the landscape and character & appearance of the area by reason of an unplanned loss of undeveloped open green fields in countryside for a large-scale urbanising development, along with the incongruous setting and scale of development away from established settlements limits.

Quantum, scale and design:

The Planning Practice Guidance (PPG) sets out how design should be considered for an outline application:

'How is design considered in outline planning applications?

Applications for outline planning permission seek to establish whether the scale and nature of a proposed development would be acceptable before fully detailed proposals are put forward. However, design is often considered at this stage in order to assist community engagement, inform an environmental impact assessment or design and access statement (where required) and provide a framework for the preparation and submission of reserved matters proposals.'

[...]

'Design quality cannot be achieved through an outline planning application alone. Outline planning applications allow fewer details about the proposal to be submitted than a full planning application, but can include design principles where these are fundamental to decision making.'

The application is for outline permission with all matters reserved apart from the access.

The proposed quantum of development would result in a housing estate detached from any recognised settlement limits and would be perceived as an incongruous large isolated suburban estate in a rural context. Whilst there are some linear and small pockets of residential development in the area, the proposal would far exceed the small increments of residential development that has occurred over time and would dramatically urbanise this part of the countryside, significantly changing how it is perceived and experienced.

The density of development would be approximately 28dph when considering the parameters proposed to be developed in the submitted Indicative Land Use Plan, Design and Access Statement and many of the supporting documents. This density would be a substantial uplift when compared to development in the vicinity. Church Lane has a density of 4 dph, the small row of detached houses along Reading Road is 10dph and, the small 1960s close Walden Avenue is 11dph.

Whilst the plan showing the proposed areas for development is labelled 'indicative', the parameters are also put forward in the accompanying Design and Access Statement. Notwithstanding, loosening the density by building on more of the site would have consequential landscape impacts and could affect other issues such as open spaces and drainage, the latter requiring large attenuation basins. Further, given the total area of the site, any development for 111 houses would still result in an uplift in density appreciably higher than the surrounding areas, especially Church Lane to the north.

Paragraphs 11 and 69 of the NPPF seek to significantly boost the supply of housing, and encourage the efficient use of land, particularly in sustainable locations. However, the NPPF is also clear that achieving these aims must not come at the expense of maintaining the character of existing areas. Paragraph 135 of the Framework advises that development should be sympathetic to local character, including the surrounding built environment and landscape setting.

In this case, while the proposal achieves a net density of approximately 28 dph, the prevailing character of the surrounding area is distinctly rural in nature, with residential development typically ranging between 4–11dph as described. The abrupt contrast in density, layout and scale would appear at odds with the established grain of development and character of the area, especially given this would be manifest in a development that is disproportionately large in relation to the rural context. Consequently, it is considered that the proposal fails to demonstrate sensitivity to the site's context and does not represent an appropriate balance between making effective use of land and respecting the established character of the area as required by the NPPF.

The indicative layout shows that the quantum of development is reliant on terraces, semi-detached dwellings and blocks of maisonettes that are uncharacteristic of the countryside development in the vicinity. The contrast in density is depicted in the indicative drawings that shows 5 houses along a section of Church Lane that would back onto 22 houses of the proposed development (see plan from D&A below).



One issue raised by Thames Valley Police Crime Prevention is that bollard lighting should be avoided and the lighting should follow the British standard. Given the rural context of the site and the surrounding area, tall lighting columns would contribute to the urbanising impact and would also erode the 'dark skies' that are a characteristic of the landscape area.

Overall, the out of character impact with the surrounding area highlights that the site is inappropriate for the scale and quantum of development proposed.

Sustainable Location:

Policy & Guidance

Policy CP9 of the Core Strategy states *'the scale of development proposals in Wokingham borough must reflect the existing or proposed levels of facilities and services at or in the location, together with their accessibility.'*

Policy CP6 states of the Core Strategy states:

'Planning permission will be granted for schemes that:

- a) Provide for sustainable forms of transport to allow choice;*
- b) Are located where there are or will be at the time of development choices in the mode of transport available and which minimise the distance people need to travel;'*

The supporting information in policy CP6 states:

'Paragraph 2.16 recognises that the borough has one of the highest car ownership rates of any English local authority. To reduce the likelihood that these vehicles will be used and to encourage modal shift, it is important to ensure all proposals achieve sustainable development'

‘To help achieve sustainable development, proposals likely to generate significant demands for travel movements should be located in areas with best access to existing good services. This means that people can have the widest range of choice in selecting transport modes and help reduce the use of the private car. The availability of good existing public transport services has been considered in drafting the strategy for the Borough.’

As set out previously in this report, the site is outside of and detached from any recognised settlement limits. The nearest existing settlement is Arborfield Cross to the east and this is a Limited Development Location, with limited facilities and services proportionate to the village.

The Borough Design Guide SPD states *‘if places are to be sustainable then the aim should be to create: Walkable neighbourhoods, with a range of facilities within 10 minutes walking distance of residential areas, which encourage people to travel on foot or by bicycle.’* Walkable neighbourhoods are defined in Manual for Streets (MfS) as those typically characterised by having a range of facilities within 10 minutes walking distance from residential areas. Manual for Streets clarifies that 10 minutes walking distance is roughly 800 metres. The Urban Design Compendium further advises:

‘People should be able to walk in 2-3 minutes (250 metres) to the post box or telephone box: the newsagent’s should be within 5 minutes (400 metres). There should be local shops, the bus stop, the health centre and perhaps a primary school within a walking distance of (say) 10 minutes (800 metres).’

The National Design Guide states that a walkable means *‘local facilities are within walking distance, generally considered to be no more than a 10 minute walk (800m radius)’*.

The Chartered Institution of Highways and Transportation (CIHT) document ‘providing for journeys on foot’ states approximately 80% of walk journeys are less than one mile. The average length of a walk journey is one kilometre (0.6 miles). The location of local facilities would fall outside of this norm.

The document further advises that 400 metres is a desirable walking distance outside of city centres; 800 metres is stated as acceptable and 1,200 metres is the preferred maximum. The document further states that these suggested walking distances are for pedestrians without a mobility impairment. The definition of a pedestrian MfS includes people of all ages, sizes and abilities. Therefore, the maximum distance in the CIHT document does not take into account disabled, elderly or small children and is referred to as an upper limit: the maximum threshold would not result in an inclusively located development where people of all ages, sizes and abilities would be encouraged to walk to local services.

Along with distances, the movement framework should be safe, convenient and inclusive. This is set out in CS policy CP2, Manual for Streets and the National Design Guide.

Policy CP6 refers to encouraging a modal shift away from the use of private motor vehicles. Therefore, whilst the upper walking distances recommend what could be

deemed walkable, the policy aim is not just to locate development where some individuals may choose to walk: it is to locate development in areas with best access to existing good services.

Assessment

Pedestrian access

The site is unconnected to any settlements and is both physically and functionally isolated from Arborfield Cross. There is only one footpath in the vicinity of the site and this on the opposite side Reading Road which residents would have to cross to use. The footpath is narrow and runs through open rural fields – consequently it has no street lighting for large sections and no passive surveillance. This is not an attractive route for pedestrians.

The illustrative masterplan shows potential opportunities to link into Church Lane but this is a narrow countryside lane with no footpaths or street lighting and therefore could not be relied upon for providing usable access to all pedestrians.

The site would not be connected to any local centre or employment areas. The nearest facility/service would be St Bartholomes Church which would be between 750m to 1.05km from the houses. However, as stated there are no footpaths along this road.

Within Arborfield Cross there is a limited range of facilities consisting of a pub, shop, village hall and primary school. The shop and village hall would be approximately 1km - 1.25km from the houses. The school 1.15km – 1.40km. The public house would be between 800m – 1.05km. These facilities would be located outside of the 800m recommending walking distances set out in the National Design Guide. Some trips would fall within the maximum distances set out in the older the Chartered Institution of Highways and Transportation but, overall the isolated location away from any defined village center would not be conducive to promoting walking to and from the development or a modal shift away from private vehicle reliance.

The local network of footpaths is limited, the walking environment is poor and the local facilities are very limited to sustain a development of this size.

Buses

There are bus stops along Reading Road which serve the Leopard 3 service. The frequency service does not meet the good service criteria as set out in policy CP6:

‘a) At least a thirty minute service frequency during peak times (7:00 to 9:00 and 16:00 to 19:00 Monday to Saturday); and

b) At least an hourly service frequency during off-peak hours (9:00 to 16:00 and 19:00 to 22:00 Monday to Saturday and between 7:00 and 22:00 on Sundays).’

The bus service runs between Wokingham, Arborfield Green, Shinfield and Reading calling at the bus stops in Reading Road. The service from Arborfield Green runs approximately every 15 mins in both directions Monday to Saturday and every 30 mins

on a Sunday. Whilst the service from Arborfield Green to Reading can therefore be described as good service as set out in CP6, the service between Arborfield Green Wokingham, is only an hourly service until just before 20:00 hours (Mon to Sat) and no service on a Sunday and therefore cannot be described as a good service as set out in CP6. The council's highway officer has stated that there are plans to extend this service - this however cannot be relied upon at this stage.

Cycling

There are no cycle lanes along the road network that connect to the site. The nearby highways are rural roads are generally narrow and/or unlit and this would impact the attractiveness of cycling.

Rail

There are no nearby rail connections.

Summary

Whilst mindful that Paragraph 105 of the Framework requires decision makers to recognise that sustainable transport solutions will vary between urban and rural areas, and it likely any scheme would be accompanied by a Travel Plan; the application site is considered to be poorly located with regard to access to facilities and services by sustainable modes of transport. Consequently, the occupiers of the dwellings would be overly reliant on private motor vehicles, failing to create the desired modal shift away from the use of private motor vehicles. The proposed development would therefore conflict with Policies CP1, CP2, CP3, CP6 and CP11 of the Core Strategy, Policies CC01 and CC02 of the MDD Local Plan, the Borough Design Guide SPD and section 8 & 9 of the NPPF.

As stated previously, the Loddon Garden Village allocation in the draft Local Plan Update is located to the north of Church Lane. Whilst master planning for the allocation is in its early stages, any potential connection to this area would either be via Church Lane, which has no footpaths or street lighting, or via the A327 which would be a lengthy route. There is no indication that the site would be sustainably related to this draft allocation, regardless of the limited weight of the LPU at this stage.

Impact on highway safety:

There will be one vehicle access serving the site and this will be via Reading Road. The Council's Highway Engineer has advised that the swept paths assessment show that the access to the site as submitted are not acceptable because the swept paths of the refuse vehicle entering the site shows that when the vehicle enters the access no vehicle can be waiting to exit. Further information was submitted and this issue has now been suitably addressed.

Visibility splays could only be achieved by the removal of 7 trees, which include a category B oak Tree (T14). Whilst the Highway Response Note from the applicant states "*The visibility splays do not conflict with any trees and where landscaping and vegetation may be within sight lines*", this is not correct when considering either the AIA

or Visibility Splay drawing (appendix B of the TA). The AIA shows a category B Oak tree being removed with the reason given as, *“remove to allow for proposed access”* and this point is also raised by the council’s Highway Engineer. The Visibility Splay plan also shows 6 trees with the easterly sight line that would have to be removed (T15 – T20).

There is an inconsistency in the submission as so far as visibility splays and the level of tree removal required. Both documents indicate that the trees would fall within required visibility splays.

The Council’s Highway Officer has requested a Second Emergency Access in accordance with the Council’s Guidance called Living Streets. This document recommends that a maximum of 100 dwellings should be served by a single access. The lack of other logical linkages is due to the countryside and unconnected location of the development. The single access point is not objectionable in this instance by reason of there being no other meaningful connections to make due to the inappropriate location of the development. The development does exceed this limit by a small amount and there is no evidence that the addition of 11 extra units would impact safety. Whilst this is not a positive facet of the development, it is not objectionable in this case, although it does stem from the countryside location of the development which is objected to.

The Council’s Highway Engineer is satisfied that the trips generated by the development would not detrimentally impact highway safety. The applicant proposes there would be 59 and 54 two-way trips in the AM and PM peak hours respectively. Using the Borough trip rates, there would be 64 and 57 two-way trips in the AM and PM peak hours respectively. The WBC highway Officer is content that the level of traffic from this proposed development would not have an adverse impact on the wider highway network.

Neighbouring Amenity:

As stated in previous sections of this report, the application for outline permission with layout as a reserved matter. Therefore, the assessment is based on whether the constraints and indicative parameters of the proposed development would have unavoidable impacts to neighbours amenity.

Overlooking:

Some of the dwellings shown within the illustrative masterplan in the north east corner would back onto to residential gardens and would be less than the minimum garden depth of 11m in the Borough Design Guide SPD. This would result in upper floor windows potentially overlooking existing private rear gardens. As the application is for outline permission it is considered that this impact could be design out at reserved matters, although this would likely be at the expense of illustrative public open space.

The properties at the northern edge of the Illustrative masterplan are at some points close to the 11m minimum but none fall below this requirement.

Loss of Light:

The properties can be positioned away from neighbouring houses and gardens that there would be no detrimental loss of light.

Overbearing:

Whilst the development would be seen from multiple houses in Barkham Road, there is no indication that a reserved matter layout would result in an overbearing impact.

Flooding and Drainage:

The site is within Flood Zone 1 where there is a low chance of fluvial flooding. There is a Main River watercourse running through the site and adjacent to the southern boundary.

The Environment Agency has reviewed the application and advised:

‘A main river runs though the western side of the proposal site. The application indicates that works within 8 metres of this section of watercourse will be avoided. However main river also runs along the southern boundary of the site and this has not been addressed nor is shown on the plans.’

Taking the above into consideration further information is required regarding the impact on southern watercourse as the proposed access would go over a section of the main river. Whilst the Flood Risk and Drainage Strategy, sets out that the new access will require new culverts, no details of this have been provided and how this would interact with the watercourse.

The Environment Agency have objected on the grounds that the proposed development would connect to Arborfield Sewage Treatment Works and the lack of capacity at this Treatment Plant could impact the water quality of the Barkham Brook. The EA State:

“We object to this application as submitted because the proposed development would pose an unacceptable risk of pollution to surface water quality and we recommend that planning permission should be refused on this basis”

[...]

“This development will connect to Arborfield STW. Environment Agency records indicate that Arborfield STW is either close to, or already exceeding the maximum headroom in its Dry Weather Flow (DWF) permit, and this development will lead to further exceedances. DWF permits are set with conditions to protect the receiving waterbody from deterioration, and when a DWF permit is exceeded, these conditions are no longer protective of the environment. It is imperative that new developments are supported by adequate infrastructure, which includes ensuring that wastewater can be treated without causing an adverse environmental impact.

Paragraph 187 (e) of the National Planning Policy Framework states that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of water pollution.

Policy CP4 in the adopted Wokingham Local Plan states 'Planning permission will not be granted unless appropriate arrangements for the improvement or provision of infrastructure, services, community and other facilities required for the development taking account of the cumulative impact of schemes are agreed.' In addition, the Thames river basin management plan requires the restoration and enhancement of water bodies to prevent deterioration and promote recovery of water bodies.

In this case we consider that the risk of potential harm to the Barkham Brook water quality posed by this proposed development is unacceptable. The proposal would result in the discharge of pollutants to the Barkham Brook waterbody thereby risking failure to meet statutory water quality objectives for that water body. In particular, there is a risk that this proposal would cause deterioration of a quality element to a lower status class and/or prevent the recovery of these to meet statutory waterbody objectives."

The Environment Agency then go onto state that to overcome the objection, a detailed foul water strategy for the improvement of the Arborfield sewerage system to accommodate the additional wastewater flows from the development would need to be submitted.

The Applicant has contacted Thames Water who are satisfied that they have capacity to accommodate the development. The response received is however limited in technical detail and bespoke information. Notwithstanding this, Thames Water appear confident that this issue can be resolved. Therefore, the requested information from EA could be dealt with via conditions.

It is also advised that an Environmental Permit would be required for development in proximity of the main river watercourse.

Sections of the site are liable to surface water flooding and areas also fall within a 100 metre zone of areas that have historically flood. The council's Drainage Engineer, as the Lead Local Flood Authority, has raised no objection - given this, the application has not been subject to a Sequential Test. It is however another indication that such a site detached from settlement limits is sequentially inappropriate.

The proposed development has however failed to demonstrate that the proposed access would be satisfactory with respect to the watercourse along the southern boundary.

Ecology:

The applicant has submitted an Ecological Impact Assessment (EIA). This identified a range of habitats on the site including trees, hedgerows, scrub and different types of grassland.

Grass snake, which is a Species of Principal Importance (SPI), were recorded on the site. Mitigation measures described in the EIA would result in snakes relocating on their own accord and indicative drawings show open areas of the site being retained along with attenuation basins that can support amphibians, which grass snakes feed upon.

The EIA States that the proposed development would result in much of the site value to birds being lost, due to the removal of the scrub and unmanaged grassland habitats, and construction of gardens, roads, buildings and other infrastructure. Mitigation measures to minimise impact on breeding birds include carrying out remedial works outside of nesting season. The overall effect (prior to any mitigation) is describe as likely to be negative and of significance at up to the local level.

Five species of bat were detected within the site during the remote detector surveys. The EIA states that the removal of much of the existing semi-natural habitats due to the proposed development is likely to reduce the site's value for foraging. Further information was requested regarding an additional bat survey and this was submitted and is acceptable. The proposed SuDS basin, if designed to retain standing water could, compensate for some of this impact, but overall, the impact of the proposal on bat activity is described as likely to be significant at the site level.

The EIA states that it is reasonable to assume that nearby ponds do not support breeding great crested newts. As such, this species is unlikely to be present within the application site. Nature Space have required further information in form of surveying additional ponds, which includes a pond 40m to the north which has been confirmed to have Great Crested Newts. They have however advised that alternatively, evidence of entry into Wokingham Borough Council's great crested newt District Licence Scheme should be provided to demonstrate that the impacts of the proposed development can be addressed through the Council's District Licence.

There is a statutory requirement to provide at least a 10% Biodiversity Net Gain for this application. The Council's Ecologist raised several concerns with the information submitted to establish the on-site habitat baseline. A revised baseline assessment was provided, and it is considered that the outstanding concerns have been addressed. Therefore, notwithstanding the issues set out above and the likely reduction in ecological/biodiversity value across the site, the statutory regime does allow for offsite credits/compensation and therefore no objection is raised regarding ecology.

Thames Basins Heaths Special Protection Area:

CS Policy CP8 *Thames Basin Heaths Special Protection Area* states that where development is likely to have an effect on the Thames Basin Heaths Special Protection Area (TBH SPA), it is required to demonstrate that adequate measures to avoid and mitigate any potential adverse effects are delivered. CS Policy CP7 *Biodiversity* reinforces this requirement.

The application site lies within 5km zone of the TBH SPA. The TBH SPA is also a Site of Special Scientific Interest (Bramshill SSSI). By virtue of being designated as the SPA, the importance of Bramshill SSSI for biodiversity is elevated to both national and international level as an area selected to protect rare, threatened or vulnerable bird species.

Paragraph 195 of the NPPF states that “*the presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site*” unless appropriate assessment concludes otherwise.

The site is outside of settlements and is not allocated or planned in any development plan policy. Such windfall sites are not accommodated in the council's Strategic SANG calculations because they fall outside of the spatial strategy set out in the plan. The established approach is that such site either provide their own avoidance in the form of a SANG or use capacity from a third party owned SANG.

No SANG provision is proposed on site. In absence of legal agreement securing appropriate off SANG mitigation / avoidance, the proposal would fail to secure appropriate mitigation of impacts associated with increase in population and resulting pressure on the TBH SPA. Paragraph 195 of the NPPF specifically refers to habitat sites and states that the presumption in favour of sustainable development does not apply in cases where the Competent Authority is not satisfied that the proposal can adequately mitigate its impacts.

However, as decision maker and the Competent Authority, the Council has assessed the proposal against paragraph 11(d)(ii) of the NPPF, as such matters could be resolved and secured as part of any legal agreement.

Heritage:

There are no heritage assets on the site. To the north of the site, along old Church Lane are two Grade II Listed Buildings known as The Old Rectory and Church of St Bartholemew. These are separated from site by Church Lane and the properties along it. Whilst the development would harm the character and appearance of the surrounding countryside, the site is somewhat detached from these heritage assets and would not detrimentally impact the immediate setting of these buildings.

The closest non-designated Heritage Assets are Cross Lanes Farmhouse, and its adjacent former barn, on the opposite side the Reading Road, which forms the southern boundary to the site. The council's heritage officer has advised that the development would not harm their setting.

To the south east of the site is the Arborfield Cross Conservation Area but the proposal would be significantly detached from this settlement and would not detrimentally effect the Conservation Area.

The council's Heritage Officer has raised no objection to the development.

Archaeology:

There are no areas of the site that are identified as having High Archaeological Potential, as defined in the Wokingham Local Plan.

Berkshire Archaeology have identified that there are potential archaeological implications with this proposed development as demonstrated by their Historic Environment Record. A Desk-based Assessment has been submitted and it has been advised that the potential for archaeology will require mitigation. Berkshire Archaeology advise

The site lies in an area with numerous cropmarks which suggest the wider area has been a focus of activity in the past, including possible enclosures c.70m east, linear marks c.250m northwest, settlement enclosures, trackway, and field system c.450-550m north. A Roman road runs north/south c.520m west of the site. There is evidence that St Bartholomew's Church c.550m northwest has 13th century origins and is likely to relate to a medieval settlement and Medieval stray finds, the nearest just c.9m outside the site boundary, have been found in the area.

The site itself does not appear to have been previously developed, therefore any archaeology below the plough line may remain undisturbed.

Had the application been acceptable, a condition would have been recommended to mitigate the impacts of development in accordance with Paragraph 218 of the NPPF(2024), which states that local planning authorities should 'require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible'.

Public Rights of Way:

There are no public rights of way on the site that will be impacted by the development.

Community Infrastructure Levy (CIL):

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

The Public Sector Equality Duty (Equality Act 2010):

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

Conclusion and Planning balance:

The council cannot demonstrate a 5-year housing land supply and paragraph 11 of the Framework therefore states that permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the 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. Or, there are specific policies in the Framework which indicate that development should be restricted. In this regard the tilted balance is engaged, all-be-it tempered due to past over-delivery.

The proposal would provide benefits that weigh in favour of the application. The provision of new housing including affordable homes is a material social benefit in favour of the scheme. The development would perform an economic role tempered by the loss of BMVL, whilst open space and BNG would broadly weigh in favour.

However, as noted, there are weighty material factors that weigh negatively in the planning balance including the conflict with the spatial strategy, landscape impact, inappropriate quantum and scale of development for its countryside location, poorly accessible location and loss of BMV land. This new residential housing estate is in the wrong location away from any cohesive and defined settlement and this substantial harm and associated conflict with the NPPF weighs heavily against the proposal. This is an underlying fundamental disbenefit of the scheme that cannot be overcome.

In light of all matters raised, the adverse impacts identified above are significantly and demonstrably outweigh the benefits of the proposal when assessed against the policies in the Framework taken as a whole, having particular regard to the issues set out in paragraph 11(d)(ii). Ultimately, this is the wrong site for the development proposed given the significant and negative spatial impacts of the development set out in this report. The application is therefore recommended for refusal for the following reasons:

Principle of development

1. The location of this unplanned development on a greenfield site in the countryside is unacceptable in principle due to the countryside location outside of settlement boundaries; its appreciable detachment from any recognised settlement limits and the resulting quantum of development that would be substantially out of scale with the immediate locality. The development conflicts with the spatial objectives of the development plan and policies CP1, CP2, CP3, CP6, CP9 and CP11 of the Core Strategy, CC01, CC02 and TB21 of the MDD Local Plan, Policies IR1, IR2 and AD1 of the Arborfield and Barkham Neighbourhood Plan, the Borough Design Guide SPD and sections 2, 4, 8, 9, 12 and 15 of the NPPF.

Quantum and scale of development

2. The proposed location and quantum of development would result in a development with a scale, character and density that is out of keeping with character and appearance of the area and countryside, resulting in a harmful detrimental impact on the locality, contrary to policies CP1, CP3, CP9 and CP11

of the Core Strategy, CC02, CC03 and TB21 of the MDD Local Plan, IR2, AD1 and AD3 of the Arborfield and Barkham Neighbourhood Plan, the Borough Design Guide SPD and sections 2, 4, 8, 9, 12 and 15 of the NPPF.

Impact on the landscape and countryside

3. The proposed development will have a detrimental impact on the landscape and character & appearance of the area by reason of the loss of fields, paddocks and green infrastructure in the countryside and the erection of a large housing development that is out of keeping with the locality, contrary to policies CP1, CP3, CP9 and CP11 of the Core Strategy CC02, CC03 and TB21 of the MDD Local Plan, IR2, AD1 and AD3 of the Arborfield and Barkham Neighbourhood Plan, the Borough Design Guide SPD, the Wokingham District Landscape Character Assessment and sections 12 and 15 of the NPPF.

Unsustainable location

4. The application site is within an unsustainable location that would not encourage a modal shift towards sustainable modes of transport, by reason of the countryside location outside of settlement limits, distances to facilities and services and poor quality of the local walking environment, contrary to policies CP1, CP2, CP3, CP6 and CP11 of the Core Strategy, Policies CC01 and CC02 of the MDD Local Plan, the Borough Design Guide SPD and section 8 & 9 of the NPPF.

Best and Most Versatile Agricultural Land

5. Part of the site is grade 3a Agricultural Land and therefore the development results in the loss of Best and Most Versatile agricultural land, contrary to Core Strategy policy CP1 and section 15 of the NPPF.

Impact on Main River Watercourse

6. Part of a main river runs along the southern boundary and insufficient information has been submitted to demonstrate that the proposed development will not adversely impact on flood risk or the watercourse, contrary to policy CC10 of the MDD Local Plan, CP1 and CP3 of the Core Strategy, AD4 of the Arborfield and Barkham Neighbourhood Plan and section 14 of the NPPF.

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

contrary to Policy NRM6 of the South East Plan, Policies CP8 and CP4 of the Core Strategy.

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 TB12.
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 5 of the NPPF.
10. 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

RECOMMENDATION

Conditions agreed:	Not required
Recommendation:	Refuse
Date:	13 February 2025
Earliest date for decision:	12 January 2025

Recommendation agreed by: (Authorised Officer)	<i>BJC</i>
Date:	20.05.25

The Conservation of Habitats and Species Regulations 2017 Screening Assessment and Appropriate Assessment

In the light of the "Sweetman Judgement" (People Over Wind and Sweetman v Coillte Teoranta, April 2018), the comments below comprise an Appropriate Assessment which includes advice on necessary avoidance and mitigation measures which is consistent with the advice provided to the Planning Inspectorate on such matters.

Summary of Response

WBC, in consultation with Natural England, has formed the view that any net increase in residential development between 400m and 5km straight-line distance from the Thames Basin Heath Special Protection Area (SPA) is likely to have a significant effect on the

integrity of the SPA, either alone or in-combination with other plans or projects. An Appropriate Assessment has been carried out which includes regard to mitigation requirements.

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

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

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

In this instance, the proposed development would result in a net increase of 111 dwellings, within 5km of the SPA which results in a total SANG contribution based on the number of bedrooms provided.

The proposed development is required to make a contribution towards Strategic Access Management and Monitoring (SAMM) which is also calculated on a per bedroom basis.

The applicant **must agree** to enter into a S106/s111 agreement to secure this contribution prior to occupation of each dwelling. Subject to the completion of the S106 agreement, the proposal would not lead to an adverse effect on the integrity of the SPA and would comply with SEP Saved Policy NRM6, policy CP8 of the Core Strategy, and the NPPF.

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

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

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

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

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

WBC must for the purposes of the assessment consult Natural England (NE) and have regard to any representations made by that body. It must also, if it considers it appropriate, take the opinion of the general public, and if it does so, it must take such steps for that purpose as it considers appropriate. In the light of the conclusions of the assessment, and

subject to Regulation 64 (Considerations of overriding public interest), WBC may agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the European site.

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

2. Stage 1 Screening for Likely Significant Effects

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

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

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

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

3. Stage 2 Appropriate Assessment

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

The following policies and guidance set out WBC's approach to relevant avoidance and mitigation measures which have been agreed with Natural England. For the majority of housing developments this will comprise the provision of (or contribution towards) Suitable Alternative Natural Greenspace (SANG) and a contribution towards the Strategic Access Management and Monitoring (SAMM) Project. The financial contributions towards SANG would be either through an obligation in a s106 agreement that requires WBC to allocate an appropriate amount of the development CIL receipt towards the provision of SANG, or through an obligation in an agreement under s111 of the Local Government Act, that requires the developer to make an appropriate financial contribution towards the provision of SANG (to be used in the event that the developer successfully seeks CIL relief). Developers will be required to secure an appropriate financial contribution to the SAMM project through an obligation in a s106 agreement.

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

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

a. Policies and Guidance

For this proposal the following guidance and policies apply:

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

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

b. SPA Avoidance and Mitigation Measures

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

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

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

The development will result in a net increase of 111 no dwellings. Depending on the dwelling mix, the level of SANG payments are set out as follows:

No. of bedrooms	SANG Contribution 5km
1 bedroom	£1,567.98
2 bedrooms	£2,049.59
3 bedrooms	£2,690.93
4 bedrooms	£3,546.86
5 bedrooms	£4,240.62
Total SANG Contribution	

ii. Strategic Access Management and Monitoring (SAMM) Contribution

The proposed development will also be required to make a contribution towards Strategic Access Management and Monitoring (SAMM). This project funds strategic visitor access management measures on the SPA to mitigate the effects of new development on it.

From 1st April 2023 SAMM contributions have been updated across the 11 Local Authorities affected by the Thames Basin Heaths Special Protection Area. Following engagement with Natural England, the Joint Strategic Partnership Board agreed this change is necessary to ensure sufficient income is raised to cover the costs of the SAMM project in perpetuity. Without this change the SAMM project would be at risk of being unable to deliver the objectives of the SAMM project, and therefore secure positive outcomes for the SPA

The level of contributions are calculated on a per bedroom basis. Depending on the dwelling mix, the level of SAMM payments are calculated as follows:

No. of bedrooms	SAMM Contribution 5km
1 bedroom	£563.00
2 bedrooms	£784.00
3 bedrooms	£1,042.00
4 bedrooms	£1,225.00
5+ bedrooms	£1,400.00
Total SAMM Contribution	

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

4. Conclusion

An Appropriate Assessment has been carried out for this development in accordance with the Habitats Regulations 2017. Without any appropriate avoidance and mitigation measures the Appropriate Assessment concludes that the development is likely to have a significant effect upon the integrity of the SPA with the result that WBC would be required to refuse a planning application.

Provided that the applicant is prepared to make a financial contribution (see above) towards the costs of SPA avoidance and mitigation measures, the application will be in accordance with the SPA mitigation requirements as set out in the relevant policies above. As the application is for outline permission for the proposed access only, the final contribution / mitigation would subject to a Reserved Matters Application - notwithstanding, a legal agreement needs to be in place for this application to ensure appropriate avoidance measures are secured.

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

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

5. Example Reason for Refusal

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

Date:

20.05.2025

Signed:

