

DELEGATED OFFICER REPORT



WOKINGHAM
BOROUGH COUNCIL

Application Number:	260117
Site Address:	Manor Farm, Longwater Road, Finchampstead, Wokingham, RG40 3SE
Expiry Date:	6 May 2026
Site Visit Date:	26 March 2026
Proposal: Full application for the proposed conversion of barn to 3no. residential dwellings and associated changes (C3).	

PLANNING POLICY	
National Policy	National Planning Policy Framework (NPPF) National Planning Policy Guidance (NPPG)
Core Strategy (CS)	CP1 – Sustainable Development 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 Plan (MDD)	CC01 – Presumption in Favour of Sustainable Development CC02 – Development Limits CC03 – Green Infrastructure, Trees and Landscaping CC04 – Sustainable Design and Construction CC07 – Parking CC09 – Development and Flood Risk CC10 – Sustainable Drainage TB05 – Housing Mix TB07 – Internal Space Standards TB21 – Landscape Character TB23 – Biodiversity and Development
Joint Minerals and Waste Plan (JMWP)	DM1 - Sustainable Development DM3 - Protection of Habitats and Species DM4 - Protection of Designated Landscape DM5 - Protection of the Countryside DM10 - Flood Risk DM11 - Water Resources DM12 - Sustainable Transport Movements DM15 - Site History
Wokingham	SS15 – Securing infrastructure SS16 – Safeguarded routes

Borough Local Plan Update (LPU)	C4 – Green and blue infrastructure and public rights of way C5 – Parking and electric vehicle charging DH2 – Safeguarding amenity
Other	Borough Design Guide Supplementary Planning Document CIL Guidance + 123 List Sustainable Design and Construction Supplementary Planning Document Finchampstead Neighbourhood Development Plan

PLANNING HISTORY		
App Number	Proposal	Decision
227/1949	Calf house buildings	Approved 16 June 1949
AG/2006/7094	Agricultural building	Approved 27 March 2006
AG/2010/1446	Agricultural barn (prior approval)	Approved 19 July 2010
AG/2011/2110	Irrigation reservoir (prior approval)	Approved 28 October 2011
AG/2011/2616	Irrigation shed (prior approval)	Approved 13 January 2012
CLP/2012/0189	20 polytunnels (1.85ha) (certificate)	Refused 25 April 2012
F/2011/2620	20 polytunnels (1.85ha), ditch and hardstanding	Approved 22 May 2012, subject to sheeting being installed January to June only (Condition 9)
F/2012/0039 (120469)	Use of barn for two caravans for seasonal workers and installation of sewage treatment plant	Approved 3 October 2012, subject to a three year limit and use by EU Plants only
F/2013/1493	Plant irrigation frame (retrospective)	Approved 11 December 2013
VAR/2013/1489	Variation of F/2011/2620 by deleting Condition 9 to allow year round use	
152683	Variation of F/2012/0039 to remove the three year limit	Approved 26 November 2015
153434	3 agricultural cold store buildings	Approved 3 March 2016
160643	12 polytunnels (0.61 ha) (retrospective)	Approved 25 May 2016
161194	10 polytunnels (1.02ha) (retrospective)	Approved 15 June 2016
160655	Agricultural worker's dwelling	Approved 19 January 2017
191112	Erection of 25 polytunnels	Approved 10 October 2019
200719	Discharge of materials and landscaping conditions in 191112	Approved 14 April 2019
201428	Variation of 191112 to remove the requirement to remove polytunnels between July and December	Approved 11 September 2020
220967	Prior approval submission for the proposed Barn A, subdivided to form 3no. dwellings and Barn B, a single dwelling.	Refused 27/05/2022
250404	Prior approval submission for the proposed change of use of agricultural buildings to 2no. residential dwellings (Use Class C3).	Prior Approval Approval 15/05/2025

253161	Prior approval submission for proposed conversion of 2 no. agricultural barns to create 2 no. dwellings, with associated building operations.	Prior Approval Not Available 03/03/2026
RELEVANT AND RECENT ENFORCEMENT HISTORY		
RFS Number	Matter	Decision
2013/00213	Polytunnels not removed in off season	No breach identified as allowed in June. Closed 20 June 2013.
2013/00221	Non-compliance with Condition 9 of F/2011/2620 (polytunnels not removed in off season)	Not expedient. Closed 5 July 2013. Application VAR/2013/1489 submitted.
2015/082570	Additional polytunnels	Application 152683 submitted and approved
2017/083380	Additional caravans on site	No breach. Closed 24 February 2017
2017/083575	Non-compliance of Condition 4 F/2012/0039	No breach. Closed 9 June 2017
2017/083576	Non-compliance of Condition 5 of F/2012/0039	No breach. Closed 9 June 2017
2017/083611	Additional caravans on site	No breach. Closed 6 July 2017
2017/083723	Provision of sewage treatment	Application submitted 9 August 2017
2017/083911	Additional polytunnels	No breach. Closed 13 October 2017
2017/083947	Additional polytunnels	No breach (in existence for more than 4 years). Closed 28 February 2019
2017/083948	Breach of Condition 3 of 153434 (inconsistent materials)	No breach. Closed 28 February 2019
2018/084096	Additional caravans on site	No breach. Closed 11 January 2018
2018/084338	Groundworks without permission	No breach. Closed 17 April 2018
2019/084829	Additional polytunnels	Planning application 191112 submitted and approved
2019/085381	Non-compliance with conditions	Discharge application 200719 submitted and approved
2024/089133	Dumping of large number of plant pots.	No breach. Closed 27/02/2024
2024/089688	Poly tunnels being built without permission.	Application submitted. Closed 02/10/2024
2025/090058	Poly tunnels being built without permission.	Application submitted. Closed 05/03/2025
2025/090704	Raising of land with plant waste.	Live case
2026/091152	Breach of Condition 14 of 241567 - (construction method statement).	Live case
2026/091294	Breach of condition 14 of 241567.	Live case

CONSULTATION RESPONSES

Internal

WBC Environmental Health – No objection, subject to condition.
WBC Drainage – Request further information.
WBC Highways – Request further information.
WBC Landscape and Trees – Objection due to insufficient information.
WBC Health and Wellbeing - No comments received.
WBC CIL – Development is CIL liable.
WBC Ecology Newts – No objection subject to an informative
WBC Ecology – Objection due to insufficient information.
WBC Waste Services - No objection if Highways requirements are secured.
WBC Cleaner and Greener - No comments received.

External

Thames Water Utilities Ltd -

REPRESENTATIONS

Parish/Town Council	Objection. Concerns relate to: - The site is in countryside. - Unsustainable location. - Other sites in more sustainable locations will provide a significant number of social housing. - No mitigation measures secured for impact to Thames Basin Heath Special Protection Area.
Ward Member(s)	No comments received.
Neighbours	No comments received.

APPRAISAL

Site Description:

Manor Farm is a 36.3-hectare soft fruit farm accessed off Manor Barns Lane. The site is bound by Jubilee Road, Dell Road, Lower Sandhurst Road, Cricket Hill and Longwater Road. The farm is readily visible in wider views from the north from Jubilee Road which sits at higher ground level than the farm.

Within the farm complex there are two areas of buildings; the central area of the farm (the location of this application), and towards the southern end of the farm. There are approximately 4.85 hectares of polytunnels concentrated in the southeastern corner of the farm and approximately 2.2 hectares of polytunnels on the south facing hill at the northern end of the farm. Open farmland, access tracks and reservoirs occupy the rest of the farm to the south.

The farm is in the countryside defined by hedgerows and trees with a scattered collection of residential dwellings to its eastern edge. To the west is Finchampstead village centre. The site also forms part of the Wokingham Borough Landscape Character Assessment – Landscape Character Area N2 - Finchampstead Pastoral Sandy Lowland which is a landscape in good condition.

The application site is located centrally within the northern half of the wider farm. The barn forms part of a small cluster of agricultural barns. In addition to the barns are three caravans to the east and south of the subject barn. Running along the northern elevation of the barn is a historic hedgerow which consists of yew hedging interspersed with mature trees.

Proposal:

This application seeks permission for the conversion of an existing barn into three terraced residential dwellings with associated private garden space and parking. The existing use of the barn was confirmed in refused Prior Approval application 220967 (27/05/2022) which states *"The stationing of the mobile homes within Block A is not agriculture and it is the Council's view that it should not be viewed as an ancillary aspect to the wider agricultural use but instead as a residential use. This is its current lawful use and so its original agricultural use, as approved in prior approval AG/2010/1446 has been lost"*.

However, the type of residential use established under permission F/2012/0039 (120469) which permitted the lawful use of the barn for the stationing of two caravans for seasonal farm workers is still the case as confirmed by the officer's site visit. Therefore, the subject barn is already in use for residential purposes but associated with the farm. It is noted that there is another caravan located outside the barn along the southern elevation of the subject barn, and another two to the east of the barn. These caravans do not have planning permission, and therefore, the use of the site for three caravans has not been established.

Principle of Development:

The National Planning Policy Framework has an underlying presumption in favour of sustainable development which is carried through to the local Development Plan. The Managing Development Delivery Local Plan Policy CC01 states that planning applications that accord with the policies in the Development Plan for Wokingham Borough will be approved without delay, unless material considerations indicate otherwise.

The application site is located within the countryside and therefore lies outside the defined Development Limits. Core Strategy Policy CP11 seeks to restrict inappropriate development in the countryside to protect its character and rural setting. However, the policy also supports the re-use of existing buildings. In this case, the proposal relates solely to the conversion of an existing barn that already forms part of the built environment.

Assessment of whether the proposed external changes would result in a harmful effect on the rural character of the area will be addressed in the Character section of this report.

As the proposal is for the conversion of an existing building to three dwellings, policy CP11 criteria 1, 2 and 3 are applicable:

'In order to protect the separate identity of settlements and maintain the quality of the environment, proposals outside of development limits will not normally be permitted except where:

- 1) *It contributes to diverse and sustainable rural enterprises within the borough, or in the case of other countryside-based enterprises and activities, it contributes and/or promotes recreation in, and enjoyment of, the countryside; and*
- 2) *It does not lead to excessive encroachment or expansion of development away from the original buildings; and*
- 3) *It is contained within suitably located buildings which are appropriate for conversion, or in the case of replacement buildings would bring about environmental improvement'.*

In this instance, the other criteria are not relevant.

The proposal involves the conversion of an existing agricultural barn to form three residential dwellings. It is acknowledged at the outset that unrestricted residential use does not, constitute a “diverse and sustainable rural enterprise” for the purposes of criterion (1) of Policy CP11. On this basis alone, the development would not represent a straightforward policy-compliant form of countryside development. There is a general presumption against this type of development under CS CP11, policy SS13 of the Finchampstead Neighbourhood Development Plan (FNDP) and paragraph 84 of the NPPF.

Existing Use

The barn currently benefits from planning permission for the siting of two seasonal agricultural worker caravans, which represents an established and lawful residential-related use on the site. However, it is noted that the use is seasonal and functional in nature and linked to the farm. The proposal would replace the seasonal farm workers accommodation with a permanent and contained residential use for three open market dwellings.

In relation to criterion 2, the conversion would be contained within the existing building envelope. In this regard, the proposal would not introduce a wholly new residential activity into an otherwise undeveloped countryside location but would rationalise and formalise an existing pattern of occupation in a more contained and permanent form. This weighs in favour of the proposal when assessed against the aims of Policy CP11 criteria 2; to avoid unnecessary encroachment into the countryside. The dwellings would be entirely contained within the shell of the existing barn, with no extension of built form beyond the original footprint.

However, the introduction of domestic curtilage, parked vehicles, garden features, lighting, and boundary treatments result in a degree of domestication and urbanising influence within the countryside. It is acknowledged that some level of domestic activity outside a converted barn is inevitable, however, the test is whether the degree of harm is unacceptable in policy terms.

In relation to criterion 3, CP11 permits development outside development limits where it is contained within suitably located buildings which are appropriate for conversion. While the proposal involves the re-use of an existing barn, compliance with this criterion is not limited solely to the physical capability of the structure to accommodate residential use. The functional role and planning context of the building are also material to whether it is ‘appropriate for conversion’ in policy terms.

In this case, the barn is lawfully used to accommodate two caravans providing seasonal agricultural workers' accommodation, directly linked to the operational needs of the wider farm. The third caravan would have needed planning permission. That said, the original permission establishes the building as an active and integral component of an ongoing rural enterprise, rather than a redundant or under-utilised structure. The Application Form also states that the existing use of the barn is for agricultural staff and confirms the site is not vacant. This existing use therefore performs a recognised countryside function consistent with the objectives of CP11 to support rural activities and enterprises.

The proposal seeks to convert the barn to three unrestricted market dwellings, severed from any functional or occupancy link to the farm. As such, the development would result in the loss of lawful rural workers' accommodation, replacing it with general market housing in the open countryside. No substantive evidence has been submitted to demonstrate that the existing caravans are redundant, surplus to requirements, or no longer required to meet the operational needs of the farm.

While it is acknowledged that paragraph 124 of the NPPF promotes the effective use of previously developed or 'brownfield' land, footnote 49 states: 'Except where this would conflict with other policies in this Framework, including causing harm to designated sites of importance for biodiversity'. The council's Ecology officer has confirmed that the site boasts a hedgerow that meets the requirements to be a classified 'important hedgerow' as defined under the Hedgerows Regulations 1997 legislation. This will be covered within the 'Character of the Area' and 'Ecology' sections of this report.

It is also acknowledged that paragraph 125d) of the NPPF promotes the development of under-utilised land and buildings, 'especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively'.

However, approval of the conversion would result in the permanent loss of on-site accommodation for seasonal agricultural workers in an area where it has not been demonstrated that there is no longer a need. Therefore, it has not been demonstrated that the building is genuinely 'available' or 'appropriate' for conversion to unrestricted residential use. This outcome would conflict with the underlying purpose of CP11, which seeks to support rural based activities.

Relationship to Surrounding Development

It is material that one of the surrounding barns has already been granted permission for conversion to residential use under Class Q of the General Permitted Development Order. When considered alongside that approval, the proposal would contribute to a small cluster of converted rural buildings, rather than resulting in an isolated dwelling in the open countryside. This is a relevant material consideration in assessing the impact of the proposal on settlement pattern and countryside character and reduces the degree to which the development would appear sporadic or unrelated to existing built form.

Recreation and Enjoyment of the Countryside

While the proposed dwellings do not themselves constitute a countryside-based enterprise, criterion (1) of Policy CP11 also refers to development which contributes to recreation in and enjoyment of the countryside. In this case, the introduction of a limited number of permanent residents would increase the use and appreciation of the surrounding rural environment, including the network of public footpaths in the vicinity of the site. Approximately 0.17 miles to the north is FINC26 Bridleway Public Right of Way and approximately 0.26 miles to the east is the FINC16 Footpath Public Right of Way.

This represents a positive but limited contribution to the social dimension of sustainable development, consistent with the broader objectives of the development plan and national policy to support well-designed re-use of rural buildings.

Overall CP11 Assessment

The principle of re-using existing rural buildings is recognised as a more sustainable form of development than new build, as it makes effective use of existing resources while avoiding additional landscape intrusion. In this regard, the proposal is considered to accord with the objectives of countryside protection policies, subject to an assessment of its detailed impacts.

When considering all the above, while the proposal may accord with CP11 criterion 2 (subject to further information regarding boundary treatments, areas of hardstanding), the development does not comply with criteria 1 and 3 of CP11.

Policy CP11 requires compliance with all three exceptions for support to be given in principle. As the development fails to fully satisfy all three criteria, the application is contrary to Policy CP11. Nevertheless, this conflict must be balanced against the identified benefits of the scheme and considered in the context of any resulting harm. This balancing exercise is summarised in the conclusion of this report.

Policy H8 of the Local Plan Update (LPU) promotes the conversion of buildings, however, only sites within settlement limits would be supported. Policy H4 of the LPU promotes 'Rural Exception Sites', however, these are on the basis that affordable housing is provided to meet local needs. While these policies may only attract limited weight given the status of the LPU, the policies demonstrate a continued presumption against this type of development in the countryside.

Housing Supply Position

The latest published assessment of housing land supply concluded a deliverable supply of 2.5 years as of the 31 March 2025. The NPPF states under paragraph 11 that where a LPA is unable to demonstrate a five-year supply of deliverable housing sites, the most important policies relating to the application may be viewed as being out of date. It continues to advise that unless there are specific policies in the NPPF protecting the land subject to the application, that permission should be granted unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the NPPF as a whole.

Material to decisions on planning applications involving housing is the underlying reasons for the shortfall in deliverable housing sites. The shortfall is not as a result of

non-delivery of housing but due to the significant over delivery in recent years reducing the bank of land with extant planning permissions.

All evidence and assessments show that whether the housing target is defined through the requirement set out in the CS or the outcome of the standard method set out in national Planning Practice Guidance, delivery has significantly exceeded the target. While this historic over delivery would mean there would be no shortfall over the coming five years, over delivery is not taken into account when determining the current figure and results in a figure of 2.5 years.

Therefore, the presumption in favour of sustainable development outlined in paragraph 11 of the NPPF, commonly referred to as the 'tilted balance' is triggered; This outlines that harm and benefits are not weighed equally but tilted (11(d)ii)). The statutory status of the development plan as the starting point for decision-making. This is set out clearly in paragraph 12 of the NPPF and is a matter of law.

In considering the weight to be attached to the various benefits and adverse impacts of a proposed development under the NPPF and the development plan, any planning application must be considered in context.

Affordable Housing:

It is acknowledged that there is a conflict between NPPF policy for affordable housing and CS CP5 (applied for sites larger than 0.16 hectare) as well as the fact that Inspectors have ruled CS policy CP8 outdated, in line with Paragraph 65 of the NPPF states that the provision of affordable housing should not be sought for residential developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer).

Section 5.5 of the Finchampstead Neighbourhood Plan (FNP) (adopted 2022) states that new housing outside development limits will only be supported against very strict criteria as defined in CS CP11, or 'successor policy. In this regard, LPU policy SS2 (Spatial strategy and settlement hierarchy) is very clear in relation to countryside development: 'Except for specific allocations identified in this plan, the countryside is not a location where additional development is planned, although limited types of development to support local needs and the rural economy will be supported'. LPU policy H3 requires that proposals for at least 5 units of accommodation (gross) or 5 bedspaces (gross), or covering a site are of at least 0.16 ha will provide affordable housing.

As such, there is no requirement to provide an affordable housing element to the scheme.

Character of the Area:

Paragraph 83 of the NPPF provides that, to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Paragraph 84 adds that local planning authorities should avoid new isolated homes in the countryside unless there are special circumstances. Paragraphs 83 and 84 of the NPPF should be read in conjunction with Core Strategy Policy CP11.

The provision of 3 dwellings on site would not alter the existing volume of development on site, as the proposed development relates to the conversion of an existing barn which forms part of the established built form within the countryside. The development would retain the existing footprint, frame, volume and overall scale of the barn, with no extensions or enlargement proposed. The external works are limited to the introduction of fenestration and domestic detailing necessary to facilitate the residential use. As such, the proposal would not result in an increase in built form or physical encroachment into the countryside beyond that which already exists.

It is acknowledged that the conversion would introduce elements typically associated with residential use, including defined areas of private amenity space and on-site parking, which would result in a degree of domestication and urbanisation of the site. The curtilage areas would be modest in scale and contained within the immediate setting of the barn, and the parking provision would be accommodated adjacent to the existing structure. However, while this impact may be localised, insufficient information has been submitted regarding boundary treatments and whether any hardstanding associated with the parking arrangements would be required.

In addition, as stated earlier in this report, the council's Ecology officer has confirmed that the historic field boundary hedge that runs along the northern elevation of the barn has been classified as an 'important hedgerow' as it meets the criteria set out under the Hedgerows Regulations 1997. The council's Trees and Landscape Officer also raised an objection to the removal of this hedge. Whilst the submitted application form states that there are no trees or hedges on the proposed development site, this is not the case.

The Trees and Landscape Officer references that the submitted site plan shows very limited information with *"no reference to the existing hedgerow which is only shown on the Proposed Foul Water Drainage Layout drawing. The Planning Statement under paragraph 5.19 relating to trees and landscape states - The site does not contain trees and will not be impacted by its landscape. There is no mention of the existing hedge either in the Planning Statement or on the Application Form, or how the proposals will be appropriately integrated into the landscape"*.

In summary, the Tree and Landscape Officer raises a concern that the proposed rear gardens would necessitate removal of the existing hedgerow and would likely introduce fencing, resulting in a cumulative urbanising impact on the wider countryside character. Insufficient information has been provided to demonstrate compliance with Policies CC03 and TB21, including details of existing vegetation removal and retention, appropriate landscape mitigation (including replacement hedgerow planting), and the nature of proposed boundary treatments, with close-boarded fencing considered unacceptable. They also request clarification on the number and retention or removal of all the existing caravans, as their continued presence alongside new dwellings could exacerbate landscape harm. In the absence of this information, they object to the proposed development.

In summary, while the conversion itself would read as a conversion of a former agricultural building rather than a new or sprawling form of residential development, the overall urbanising effects (boundary treatment, confirmation of edge to be removed, and extent of hardstanding), are unknown as insufficient information has been

submitted to clarify these points. It is also not clear from the submitted Design and Access Statement (ET Planning) whether the external walls would retain the existing metal fabric or whether this would be clad with another material. It is recognised however, that a materials condition could secure details of external finishes in the event of planning approval.

On balance, while the proposed conversion works would be contained within the existing barn envelope, the application fails to demonstrate that the development as a whole would be acceptable in character and landscape terms. No information has been submitted to confirm whether the historic hedgerow on the site, identified as an “important hedgerow”, would be removed, nor has any mitigation or replacement planting been proposed. In addition, insufficient detail has been provided regarding boundary treatments, private garden spaces, parking and areas of hard-standing to show how the inevitable domestication associated with three residential dwellings would integrate sensitively within the Wokingham Borough Landscape Character Assessment, Landscape Character Area N2 – Finchampstead Pastoral Sandy Lowland. In the absence of this information, it has not been demonstrated that the proposal would respect or enhance the rural character of the site, and the development is therefore contrary to MDD Policies CC03 and TB21 and CS Policy CP3.

Landscape and Trees:

There are no protected trees or trees identified on the Veteran Tree Database within the site. There are also no public footpaths within the immediate vicinity.

While the application form states that no trees or hedges would be removed as part of the development, it must be noted that a mature hedgerow runs parallel with the northern elevation of the barn. To facilitate implementing the private garden areas, this hedge would have to be removed. This has not been acknowledged in any of the submitted information (bar the Foul Water Plan: 87485 100 P02). The information submitted does not therefore, clearly or accurately acknowledge the full extent of the existing vegetation or demonstrate which sections of the hedgerow would be removed.

The council’s Trees and Landscape (T&L) Officer was consulted and objects to the proposal due to a lack of information. A summary of the T&L officer comments are outlined in the ‘Character of the Area’ section of this report.

In conclusion, the officer is unable to conclude that the current proposal would avoid harm to landscape character or to the historic hedgerow, or that it would comply with relevant countryside and landscape Local Plan policies CC03 and TB21.

Ecology and Biodiversity Net Gain (BNG):

Following the introduction of ‘Biodiversity Net Gain’, major developments (from November 2023) and minor developments (from April 2024) must demonstrate how the development will increase biodiversity by a minimum of 10%. Developments which are exempt from BNG are not required to provide a 10% net gain. This development has submitted that it is exempt on the basis that less than 25m² of habitat is impacted. The council’s Ecology Officer was consulted and raises objection to the proposed development as there is insufficient information to demonstrate that priority habitats would not be impacted and Biodiversity Net Gain (BNG) metrics.

The submitted Application Form states that the development would be BNG exempt as it would be de minimis (below the threshold). However, the Ecology Officer advises that the development would not be exempt from BNG. They outline that although the application form states that the development is exempt on the basis that less than 25m² of habitat would be affected, the Officer has identified inconsistencies within the submitted information.

In particular, the drainage strategy confirms the presence of grassland and a yew hedgerow on site, both of which constitute habitats under the BNG regime. When the drainage strategy is overlaid with the proposed site layout, it indicates that potentially 155m² of habitat would be removed to facilitate the formation of the proposed residential gardens as amenity space.

As a result, the development does not meet the de minimis exemption criteria under the Environment Act 2021 and associated regulations. The proposal is therefore subject to mandatory BNG and must demonstrate a minimum 10% measurable net gain in biodiversity value.

In relation to the existing hedgerow, the Officer confirms the status of the important feature and the impact the proposed development would have. The Officer outlines that the on-site hedgerow is likely to be protected under the Hedgerows Regulations 1997. Based on GIS analysis and historic mapping, the hedgerow has been in existence since at least 1830, is of sufficient length, and is associated with agricultural land. It therefore meets the criteria of an “important hedgerow”, including historical significance.

Although the hedgerow is currently fragmented and no longer functions as a continuous wildlife corridor, it remains a remnant habitat of ecological value. It performs a critical stepping-stone role, contributing to ecological connectivity between open countryside, an ancient tree corridor to the west, and areas of lowland mixed deciduous woodland to the east. Removal of this hedgerow would further degrade connectivity, resulting in the complete loss of a functional ecological link between these habitats.

The proposed layout is considered contrary to CS Policy CP7, as it would result in harm to a feature of major ecological importance (namely a wildlife corridor), without adequately demonstrating that the need for the development outweighs the need to safeguard biodiversity. Given the hedgerow’s age and established character, the Officer considers it unlikely that meaningful mitigation or compensation could be achieved to offset its loss.

In addition, the proposal conflicts with MDD Policy TB23 which requires development to remain ecologically permeable through the protection and enhancement of existing corridors. The replacement of the hedgerow with domestic gardens and close-board fencing would significantly reduce ecological permeability.

The Officer also identifies conflict with Chapter 15 of the NPPF, which places strong emphasis on protecting and enhancing ecological networks, including wildlife corridors and stepping-stone habitats.

The Ecology Officer also commented on the impact of the proposed development on other protected species. In relation to the protection of bats, they state that Preliminary

Roost Assessment (Cherryfield Ecology) has been submitted and concludes that the barn buildings have negligible potential for roosting bats. This assessment is supported by adequate justification and photographic evidence, and the Officer agrees that the buildings lack suitable features to support bat roosts.

However, the Officer highlights that artificial lighting associated with the development has the potential to adversely affect foraging and commuting bats, particularly in relation to the on-site hedgerow. The hedgerow is considered likely to function as a stepping-stone feature and may represent the only remaining commuting corridor linking habitats to the east and west. Bat records confirm that bats have been recorded foraging within the wider site as recently as 2024, demonstrating ongoing bat activity in the area.

To address this, a sensitive lighting approach would be required with any grant of planning permission.

Breeding Birds

The Officer reports that the applicant has not submitted a Preliminary Ecological Appraisal to assess impacts on other protected species. They recommend that should the application be recommended for approval, and particularly if hedgerow removal is permitted, the Officer advises that a breeding birds condition would be required.

Wild breeding birds are protected under the Wildlife and Countryside Act 1981, which makes it an offence to damage or destroy nests or eggs. A condition would therefore be necessary to ensure that vegetation clearance and construction activities do not result in harm to breeding birds and that the works are carried out in compliance with national legislation.

Great Crested Newts (GCN)

The application site is in an amber zone for GCN. Amber zones contain suitable habitat and GCNs are likely to be present. The council's GCN Officer was consulted and raised no objection to the proposed development, concluding that the proposal would be unlikely to have any impact upon the protected species and/or their habitats. They recommend for an Informative to be attached to any grant of approval as it was considered that a formal survey would be disproportionate given the scale of development and likely impacts of the development.

As a result, the developer is reminded that GCN and their resting places are fully protected under wildlife legislation, and planning permission does not remove the need for a licence should an offence be likely. If GCN are discovered during works, all activity must cease until advice is obtained from a suitably qualified ecologist and Natural England. To further reduce risk, precautionary measures are recommended during construction, including covering or ramping trenches, storing materials on pallets or in skips, and avoiding materials being left on the ground. These measures are advised to ensure compliance with biodiversity legislation and national policy.

SPA Mitigation

Policy CP8 of the Core Strategy focuses on the Thames Basin Heath Special Protection Area (TBH SPA) and outlines when mitigation is required. In the 5km zone,

all residential proposals that include a net increase of 1 or more dwellings are required to provide mitigation for the TBH SPA.

The PPG defines habitats development as development which is likely to have a significant effect on a qualifying European site or a European offshore marine site. In this case, the TBHSPA.

Given that the risk of a significant effect on the TBH SPA would arise from the location, land use and the amount of development which are under consideration, it must be established prior to the grant of any such permission that the development would not adversely affect the integrity of the protected site and therefore, it is not a matter that can be left to a later stage.

In this case, the Council's approach is to secure mitigation as a financial contribution to a strategic SANG including to Strategic Access Management and Monitoring (SAMM) measures as an alternative solution via a S106 legal agreement. This is to secure 0.0567 units of area allocated at Rooks Nest Wood Strategic SANG. This would equate to SANG £7,431.55, SAMM £3,055, monitoring fee £565, total £11,051.55.

As the proposal would result in the addition of three residential dwellings, with a total of eight (8) bedrooms, SPA mitigation is required. The agent confirmed in an email (30/04/2026) that there are currently three caravans on site, each with 3-bedrooms. The agent alleges that as the existing caravans provide 9-bedrooms in total, and that this would off-set the requirement for SPA mitigation as the proposed development would result in three dwellings with a reduced overall number of bedrooms (8).

However, only two of the caravans are lawfully permitted under application F/2012/0039 (120469) which granted permission for the use of the subject barn for the siting of two caravans for seasonal farm workers. Therefore, only two caravans could potentially be offset when calculating mitigation on the qualifying European site.

However, upon review of the consultation responses for permission 230627 (for the stationing of 12 x 2-bedroom static mobile homes for seasonal workers), Natural England were consulted and in summary, they concluded that in relation to temporary seasonal accommodation:

"Natural England's stance on temporary and seasonal accommodation is that as they do not form the permanent resident of the workers, SAMM and SANG contributions are not required. It will need to be conditioned that the mobile homes will only be in use for 4 months of the year – this could be through the seasonal removal of the units".

With the above in mind, the caravans would not have required SPA mitigation as the temporary use of the caravans for seasonal workers would have been considered not to have generated any adverse effects on the SPA, providing their occupancy is temporary.

Therefore, neither of the caravans can be considered available to offset SPA mitigation as part of this application.

In conclusion, the proposal fails to provide avoidance measures for the adverse effect on the integrity of the European protected site which renders the proposal as habitats development. As such, 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 and this forms a reason for refusal.

Internal Space Standards and Amenity Space:

Policy TB07 of the MDD outlines the required internal space standards for new residential units for a variety of household needs with the aim of promoting high standards of liveability, accessibility and comfort.

The 2 x three-bedroom dwellings would marginally exceed the minimum 87 sqm required to comply with policy TB07 of the MDD, and the two-bedroom unit would exceed the minimum 83 sqm requirement.

Regarding amenity space, the BDG recommends that private rear garden depths should generally achieve a minimum length of 11m to provide an adequate level of private outdoor amenity for future occupiers. This guidance is intended to ensure that residents have sufficient usable space and to avoid overly constrained living environments, particularly where gardens are closely bounded by other residential development.

However, two of the dwellings would not comply with the recommended length of 11m. The eastern unit would have a garden depth of approximately 8.85m and the central unit, approximately 10m. As a result, the proposed outdoor amenity spaces would be insufficient in size to support a range of domestic activities with appropriate levels of privacy for occupants. However, paragraph 5.19 of the Planning Statement emphasises 'the development is privileged with a side amenity space'. The area would measure between 4m and 10m in width and approximately 18.4m in length. Whilst this is a welcomed additional amenity space, there are concerns regarding how useable the area would be given that the only route to access the area would be via front doors, across the driveway area. This would also generate a direct loss of privacy impact to the occupants of the western unit, by virtue of the ground floor, side facing window to serve the kitchen.

In summary, the proposed development would result in three residential units that would comply with nationally prescribed internal space standards; however, the outdoor amenity space is compromised on the central and eastern units resulting in inadequate, useable private garden provision.

Neighbouring Amenity:

Overlooking, Loss of Light & Overbearing:

There are no significant impacts on neighbouring amenity that would warrant a reason for refusal, by virtue of adequate separation distances from neighbouring dwellings that are more than the provisions within the BDG.

Regarding the dwellings themselves, the conversion would retain the existing rectangular footprint of the barn, resulting in all three dwellings sharing the same principal and rear building lines. As such, the proposal would read as a short terrace of three dwellings.

The internal layout provides windows to all habitable rooms, except for the downstairs WCs and the main bathroom to the central unit; however, as these are non-habitable rooms, this arrangement is acceptable.

The resultant terrace would not result in overshadowing or an overbearing impact between the dwellings, due to the shared building lines. A degree of mutual overlooking would arise by virtue of the terraced form of the development; however, some level of overlooking is generally expected within residential environments. Notwithstanding this, the scheme fails to accord with the BDG guidance, and research carried out by the World Health Organisation on natural light. In particular, guidance at R18 advises that new housing should be designed to be dual aspect where possible and should avoid north-facing, single-aspect dwellings. The proposed layout does not meet this guidance, and this shortcoming weighs against the scheme when considering the overall quality of the living environment for future occupiers.

Highway Access and Parking Provision:

Paragraph 83 of the NPPF states that housing should be located where it will enhance or maintain the vitality of rural communities and Section 9 of the NPPF seeks to ensure the growth of sustainable transport in managing development and approval of planning applications. This is reinforced in Paragraph 129, which refers to the 'availability and capacity of infrastructure and services...and the scope to promote sustainable travel modes that limit future car use'.

Paragraph 116 of the NPPF states that 'Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios'.

The proposed dwellings would be accessed using the existing access on Manor Barns Lane via Cricket Hill. The Council's Highways officer commented that "*The existing driveway will be retained and thus Highways expect the existing sightline can be retained*".

In terms of traffic impacts, the officer commented "*The traffic generated from the three dwellings are unlikely to have significant impacts on the wider highway network*".

Parking:

It is proposed that each dwelling would have two parking spaces. The Council's Highways Officer commented:

"Access:

Independent access to parking of all three barns shall be available, and no parking shall obstruct the shared access road. Highways have overlaid the parking arrangements approved in 250404 and proposed in this proposal, it is noted that the proposed parking will obstruct the access of at least one

approved parking space (see image below). The proposed access road and internal road arrangements are also slightly different, which shows that one of the proposed parking spaces will obstruct the shared access road. Revisions are required.



Parking:

According to the WBC Car Parking Standards, the development of such scale in a Village location will require a minimum of four parking within the red line boundary (if all parking spaces are unallocated) or five to seven parking spaces including an unallocated visitor space (if allocated parking is provided). Each parking space shall have minimum dimensions of 5.0m x 2.5m.

Six driveway parking spaces of dimensions 6m x 3m are proposed, which may be acceptable subject to confirmation of whether the parking spaces are to be allocated or unallocated.

If any of the proposed parking will be allocated, the applicant shall label the proposed allocation of parking”.

The agent confirmed (email dated 15/05/2026) that the parking arrangements would provide allocated parking. Therefore, the proposed parking provision of six spaces would could be acceptable, subject to the allocated parking spaces being specified on a plan. This information could be secured via condition.

Cycle Parking:

While page 12 of the Design and Access Statement states that the development would ‘Secure cycle provision to encourage sustainable modes of transport’, these have not been shown on the site plan. If the development were accepted, details of cycle stores could be secured by condition. Policy CC07 and Appendix 2 of the MDD Local Plan stipulates minimum cycle parking standards and Policies P2 and P3 of the Borough Design Guide SPD ensure that it is conveniently located, secure and undercover.

According to the WBC Parking Standards, one cycle parking allocation is required per house with 3 or less habitable rooms and two cycle parking allocation are required per house with 4 habitable rooms.

In conclusion, currently, there is insufficient information to demonstrate the proposed parking provision would meet the standards set out in Appendix 2 of the MDD, and that

the scheme would provide an appropriate level of off-street parking. However, details of cycle stores and parking arrangements could be secured by condition to address the Highways Officer concerns.

Flooding and Drainage:

The application site is in flood zone 1 with a low risk of fluvial flooding and a low risk of surface water flooding. The council's Drainage officer was consulted and requested further information regarding the proposed drainage strategy. They commented that insufficient information has been provided to demonstrate that the proposed development would manage surface water runoff in a sustainable manner.

While this information has not been provided to support the application, the information could be secured via condition with any grant of planning permission. However, as insufficient drainage information has been submitted to support the application, this forms a reason for refusal.

Contamination risks on the site:

Section 78A (2) of Part 2A of the Environmental Protection Act 1990(a) states that 'contaminated land' is any land which appears to the local authority in whose area it is situated to be in such a condition, by reason of substances in, on or under the land that (a) that significant harm is being caused or (b) significant pollution of controlled waters is being caused, or there is a significant possibility of such pollution being caused.

There is potential for ground contamination from the site's potential former agricultural/storage use and therefore may not be suitable for the proposed residential use. Phase 1 Geo-environmental appraisal report Ref: 83754R1 January 2025 has been submitted with the application. In summary, the overall risk to the on-site receptors can be described as 'Low to Moderate/Low in relation to the proposed redevelopment of the site.

Page 3 states 'An asbestos survey is recommended prior to any redevelopment/refurbishment works'.

It is unknown whether an asbestos survey was undertaken, although it is assumed not as this has not been submitted to support the application.

The council's Environment Health Officer was consulted and raised no objection to the proposal subject to conditions. They commented:

"Contaminated Land

A Phase 1 Contaminated Land Assessment (GeoSmart, January 2025) has been reviewed. The report identifies the site as posing a low to moderate/low risk; however, this conclusion is based on a desk-based assessment only, with no intrusive investigation undertaken.

The site has historically been used for agricultural purposes and there is potential for contamination associated with fuel storage, septic systems and agricultural chemicals. The report also identifies the presence of asbestos-containing materials within the existing buildings and the potential for asbestos fibres to be present within surrounding soils.

The assessment confirms that there is potential for localised contamination to impact future site users and controlled waters. The site is underlain by a Secondary A aquifer and there are groundwater abstraction points in close proximity, increasing the sensitivity of the site.

As no intrusive investigation has been undertaken, the risks cannot be fully quantified at this stage. The report recommends a Phase 2 investigation and Environmental Health agrees that this is necessary to demonstrate that the site is suitable for residential use.

Noise

The proposed development is residential in nature and is not expected to introduce significant noise impacts. However, the site is located within a rural and agricultural setting and future occupants are likely to be exposed to noise associated with farming activities, machinery and general operations.

Air Quality (Construction)

Construction and conversion works may give rise to dust and general disturbance during the development phase. Given the scale of the proposal, these impacts are expected to be limited and short-term, provided that standard good practice measures are followed on site”.

No intrusive investigation has been carried out. While a condition could be attached requiring a full phased contaminated land assessment, this information is currently lacking. Therefore, as there is insufficient information to demonstrate that the land is suitable for residential use to protect future occupants, this forms a reason for refusal.

Sustainable Development

Paragraph 8 of the NPPF sets out that achieving sustainable development means that development should satisfy three overarching objectives in relation to economic, social and environmental benefits.

Economically the proposed development would encourage development and associated economic growth through the construction works. The inhabitants would also contribute to the local economy and to the continued viability of local services in the surrounding villages. However, as this proposal is for three dwellings, the economic role of the development is limited.

Regarding the **social** role, the development would provide for three dwellings in this location which would not make a significant contribution to the Council’s housing supply position. It would consist of 1 x two-bedroom property and 2 x three-bedroom properties. Annex E of the FNP (adopted 2022) outlines the results from the ‘Estate Agent Survey’ and concludes that the responses from Questions 2 and 3 of the survey highlight that the properties in the area in the greatest demand are 2-3 bedroom houses and 4-5 bedroom houses. Therefore, the three proposed dwellings would contribute to the types of properties in most demand within the local area. Therefore, a moderate social role would be achieved.

Regarding its **environmental** role the barn currently accommodates two lawful caravans although there are five on site (three additional in the yard). It is recognised that the re-use of the barn would be more sustainable outcome than a full demolition and re-build. These caravans represent a relatively low-quality form of accommodation and, by their nature, offer limited thermal performance, poor energy efficiency and minimal opportunity to achieve modern sustainability standards. The proposal would remove these caravans and instead secure three permanent residential dwellings constructed to current Building Regulations standards. This would enable the incorporation of significantly enhanced insulation, modern construction methods and energy-efficient building fabric, which would collectively result in a substantial improvement in the energy performance of the accommodation, delivering meaningful environmental benefits.

Biodiversity enhancement measurements on-site can also be secured by condition as well as off-site via s106 monies towards mitigation for the Thames Basin Heath Special Protection Area (TBH SPA).

It is noted however, that the application does not refer to the removal of the existing Yew hedgerow which would be required in order to implement the proposed development. The hedgerow has been classified as a 'historic hedgerow' that is protected under the Hedgerows Regulations 1997. No justification has been provided regarding the removal of this hedge, and no SPA mitigation has been secured.

Notwithstanding the high degree of reliance on private vehicles that would likely be required by the occupants, it is noted that paragraph 83 of the NPPF does accept that where there are groups of smaller settlements, development may support services in a village nearby. This acknowledges that there may be the need to travel, and it would be reasonable to accept the use of a private car in a rural location. Therefore, although there is very limited scope for the use of other means of transport, given the distance to Finchampstead and Crowthorne the proposal would play a role in the vitality of these settlements. Overall, an environmental role is performed, and the environmental role of the development is considered to have significant weight.

Overall Planning Balance

The application seeks full planning permission for the conversion of an existing barn to form three open-market dwellings in the open countryside. While the principle of re-using existing rural buildings is recognised as more sustainable than new build development, the proposal must be assessed against Core Strategy Policy CP11.

The proposal fails to comply with Policy CP11 in principle. Although the development would be physically contained within the existing building envelope (criterion 2), it does not satisfy criteria 1 or 3. The proposal would result in the loss of lawful seasonal agricultural workers' accommodation which continues to serve an identified rural enterprise, and no evidence has been submitted to demonstrate that this accommodation is redundant or no longer required. The conversion to unrestricted residential use would therefore undermine the functional role of the building in the rural economy and is not considered an appropriate form of countryside development. This conflict attracts significant weight.

In landscape and character terms, while the conversion would not increase built form, the proposal introduces residential curtilage, parking and domestication into a sensitive rural setting. Insufficient information has been submitted to demonstrate how the development would integrate with the surrounding landscape, particularly in relation to boundary treatments, hardstanding and the treatment or retention of the historic hedgerow along the northern boundary. The proposal therefore fails to demonstrate compliance with Policies CC03 and TB21 and would result in unacceptable harm to countryside character.

In ecological terms, the development raises substantive concerns. Insufficient information has been provided to demonstrate that priority habitats, including an important historic hedgerow, would be protected or adequately mitigated. The proposal fails to demonstrate compliance with mandatory Biodiversity Net Gain requirements and would result in harm to ecological connectivity, contrary to CS Policy CP7, MDD Policy TB23 and the NPPF. This harm carries significant weight.

In addition, the proposal fails to secure mitigation for impacts on the Thames Basin Heaths Special Protection Area. The lawful seasonal use of existing caravans cannot be relied upon to offset SPA impacts, and no avoidance or mitigation measures have been secured. As a result, the Local Planning Authority is unable to conclude that the development would not adversely affect the integrity of the SPA, contrary to Policy CP8 and the Habitats Regulations. This represents a fundamental and determinative conflict.

While the scheme would provide three dwellings contributing modestly to housing supply and would deliver some environmental benefits through the re-use of an existing structure, these benefits are limited in scale and attract moderate weight. The shortfall in housing land supply and the tilted balance under the NPPF have been carefully considered; however, the identified harms, particularly in relation to countryside policy conflict, biodiversity, landscape impact and SPA mitigation are significant.

Conclusion:

Taken as a whole, the adverse impacts of the proposal significantly and demonstrably outweigh the limited benefits. The development has not been demonstrated to be policy compliant, and the overall planning balance weighs firmly against the grant of planning permission.

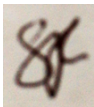
Community Infrastructure Levy (CIL): When planning permission is granted for a development that is CIL liable, the Council will issue a liability notice as soon as practicable after the day on which the planning permission first permits development. Completing the assumption of liability notice is a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

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

relation to this particular planning application and there would be no significant adverse impacts as a result of the development.

RECOMMENDATION

Conditions agreed:	Not required
Recommendation:	Refusal
Date:	24 April 2026
Earliest date for decision:	1 April 2026

Recommendation agreed by: (Authorised Officer)	
Date:	4.6.26

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

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

Summary of Response

WBC, in consultation with Natural England, has formed the view that any net increase in residential development between 400m and 5km straight-line distance from the Thames Basin Heath (TBH) 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 the 5km linear mitigation zone from the TBH 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 TBH 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 2 x 3-bedroom dwellings and 1 x 2-bedroom dwelling within 5km of the SPA which results in a total SANG contribution of **£7,431.55**.

The proposed development is required to make a contribution towards Strategic Access Management and Monitoring (SAMM) which is also calculated on a per bedroom basis. Taking account of the per bedroom contributions this results in a total SAMM contribution of **£3,055.00**.

The total SPA related financial contribution for this proposal is **£11,051.55** (including monitoring fee £565). The applicant **must agree** to enter into a S106/s111 agreement to secure this contribution prior to occupation of each dwelling. Subject to the completion of the S106 agreement, the proposal would not lead to an adverse effect on the integrity of the SPA and would comply with SEP Saved Policy NRM6, policy CP8 of the Core Strategy, and the NPPF.

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

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

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

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

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

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

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

2. Stage 1 Screening for Likely Significant Effects

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

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

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

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

3. Stage 2 Appropriate Assessment

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

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

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

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 **3 no dwellings**, broken down as follows: **2 no X 3-bedroom dwellings, 1 no X 2-bedroom dwellings**. Depending on the dwelling mix, the level of SANG payments are set out as follows:

No. of bedrooms	SANG Contribution 5km	Aggregate SANG Contribution
1 bedroom	NA	NA
2 bedrooms	£2,049.59	1 x 2,049.69 = £2,049.69
3 bedrooms	£2,690.93	2 x 2,690.93 = £5,381.86
4 bedrooms	NA	NA
5 bedrooms	NA	NA
Total SANG Contribution		£7,431.55

ii. Strategic Access Management and Monitoring (SAMM) Contribution

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

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

The level of contributions are calculated on a per bedroom basis. The application for this development is for **1no x 2-bedroom dwelling, 2 x 3-bedroom dwellings**. Depending on the dwelling mix, the level of SAMM payments are calculated as follows:

No. of bedrooms	SAMM Contribution 5km	Aggregate SAMM Contribution
1 bedroom	NA	NA
2 bedrooms	£835.00	1 x 835 = £835.00
3 bedrooms	£1,110.00	2 x 1,110 = 2,220
4 bedrooms	NA	NA
5+ bedrooms	NA	NA
Total SAMM Contribution		£3,055.00

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

4. Conclusion

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

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

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

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

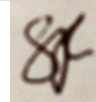
5. Example Reason for Refusal

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

Date:

4.6.26

Signed:

A handwritten signature in dark ink, appearing to be 'SF' or similar, on a light background.

PLANNING CONSTRAINTS/STATUS

Outside Development Limits

Countryside

Thames Basin Heath SPA Mitigation Zones - 5km Linear Mitigation Zone

Risk of Flooding from Surface Water

Bat Roost Habitat Suitability

Great Crested Newt Impact Risk Zones – Amber

Landscape Character Assessment 2019 - Finchampstead Pastoral Sandy Lowland

Finchampstead Ward

Finchampstead Parish