

ET Planning

Planning, Design and Access Statement

Client:

Mr Roy Bowers

Land East of Highfield Park,

Eversley Road, Arborfield Cross, Reading, RG2 9PP

change of use of land to a caravan site for Gypsy/Traveller occupation with associated car parking and engineering operations (part retrospective)

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1. Introduction

- 1.1 This statement is produced to support a planning application for the change of use of land for the proposed provision of a Gypsy/Traveller site comprising no.1 pitch consisting of no.1 static caravan with associated car parking and hardstanding.
- 1.2 This planning statement will cover the background to the application and provide the necessary information to enable its determination by officers at the Council. It will consider the proposal in light of relevant planning policies and other material considerations. The conclusion reached is that key material considerations and the wider objectives of National and Local planning policy support the grant of permission.
- 1.3 In addition to this planning statement, the application is accompanied by the appropriate plans and planning application forms and ownership certificate, duly signed and completed.
- 1.4 The relevant application fee will be submitted by the applicant separately.

2. Site Location and Description

- 2.1 The application site comprises a broadly rectangular plot, accessed via an unclassified road off the Northern side of Poperinghe Way. The surrounding character of the site is mixed comprising countryside to the North and residential to the East, owing to its 'edge of settlement' location. The proposed site is situated to the East of the existing Gypsy caravan site Highfield Park and Walkers Yard. By being sited directly adjacent to the authorised Gypsy and Traveller site at Highfield Park, the proposed pitch integrates with the existing community and adheres to the character of the locality.
- 2.2 The pitch is intended to accommodate a single Gypsy/Traveller household and will include provision for a static caravan and associated amenity space. Parking and turning areas can be achieved within the curtilage of the site without adverse impact on highway safety. Landscaping measures, including retention of existing hedgerows and additional planting, will ensure the site integrates with the surrounding landscape character.
- 2.3 The location benefits from being in close proximity to local services and facilities within Arborfield Green, while retaining a rural setting consistent with the requirements of national and local planning policy for traveller sites.
- 2.4 The site is not situated within the Green Belt, nor is it located within a National Landscape (formally AONB), Special Areas of Conservation (SAC), or Special Protection Area (SPA).

3. Planning History

- 3.1 The application site was included within the site boundary for application ref 040173 for the proposed *"Outline application for the proposed demolition of existing buildings and redevelopment to provide a residential development at a density of 30 - 40 dwellings per hectare on an area of 4.4 hectares to include open space, associated access, car parking, internal service roads, landscaping and retention of electricity sub-station. (Duplicate application with 0/2004/1646)."* This was refused 20/10/2004.
- 3.2 Application Ref 030477 – *"Application for Screening Opinion for residential re-development of land with associated open space and access."* Replied 03/09/2003
- 3.3 Application Ref F/1999/0128 – *"Proposed change of use of land to gipsy caravan site."* Refused 08/03/2000.
- 3.4 Application Ref F/1995/63126 – *"Change Of Use Of Land To Caravan Site For 16 Units."* Refused 19/02/1996.

4. Development Proposals

- 4.1 The National Design Guide (2019) identifies that "well-designed homes and buildings are functional, accessible and sustainable. They provide internal environments and associated external spaces that support the health and well-being of their users and all who experience them. They meet the needs of a diverse range of users, taking into account factors such as the ageing population and cultural differences. They are adequate in size, fit for purpose and are adaptable to the changing needs of their occupants over time" (para 120-121).

- 4.2 Regarding the requirements of NPPG Paragraph: 029 Reference ID: 14-029-20140306 in respect of Design and Access Statements, the proposal is described as follows:
- 4.3 **Use and Amount:** The proposal seeks to provide no.1 pitch comprising no.1 static caravan with associated car parking, access and hardstanding.
- 4.4 **Layout and Scale:** The layout has been designed to accommodate one static caravan, positioned towards the rear within the plot to allow safe manoeuvring of vehicles and clear separation from site boundaries. A surfaced area of permeable hardstanding will provide adequate space for access, parking, and turning, with entry taken from a new gated access. The scale of development is intentionally modest, limited to a single unit, and is contained within well-defined boundaries reinforced by proposed bordering hedgerows, trees and fencing. This ensures the proposal remains proportionate to its setting, integrates with the adjoining authorised Gypsy site at Highfield Park, and respects the established character of the surrounding area.
- 4.5 **Landscaping:** The site will benefit from boundary vegetation, including hedgerows and trees, which will be protected during the change of use to provide natural screening and visual containment. To reinforce these boundaries, additional native planting will be introduced along the edges of the site, enhancing biodiversity and strengthening integration with the surrounding landscape. Areas of hardstanding will be finished in permeable surfacing materials to manage surface water sustainably and soften the overall appearance of the development. Details of internal vegetation and landscaping can be appropriately managed and secured through the use of a planning condition, ensuring that the site remains well integrated and visually unobtrusive within its semi-rural context.

- 4.6 **Access & Parking:** The proposed site will utilise the existing unclassified road that serves as access to the neighbouring Highfield Park caravan site. Access will be awarded to the proposed site via the installation of entrance gates, on the Eastern side of the unclassified road, with visibility in both directions, ensuring safe ingress and egress for all vehicles. The pitch includes sufficient hardstanding to accommodate static caravan with a dedicated on-plot parking/turning space, ensuring no overspill onto the highway. The proposed layout therefore meets the operational needs of the occupiers while maintaining highway safety and efficiency.

5. Policy Assessment

- 5.1 **National Guidance:** The National Planning Policy Framework (NPPF) is a relevant material consideration to the application.
- 5.2 The proposal pertains to the provision of a Gypsy/Traveller site comprising no.1 pitch, therefore the Planning Policy for Traveller Sites 2024 (PPTS) is relevant and is also a material consideration in the determination of planning decisions.
- 5.3 The purpose of the planning system is to contribute to the achievement of sustainable development. So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development. Paragraph 39 of the NPPF states that "Local planning authorities should approach decision on proposed development in a positive and creative way" and "at every level should seek to approve applications for sustainable development where possible". Paragraph 124 of the NPPF comments that planning should "promote an effective use of land" in "meeting the need for homes and other uses, whilst

safeguarding and improving the environment and ensuring safe and healthy living conditions”.

- 5.4 Paragraph 61 confirms the Government’s objective to boost the supply of housing, and paragraph 8 identifies the three objectives of sustainable development, as economic, environmental and social.
- 5.5 **Principle of Development:** Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the Development Plan, unless material considerations indicate otherwise.
- 5.6 All planning applications should be dealt with in accordance with the relevant development plan policies unless material considerations indicate otherwise. The NPPF is a material planning consideration in all planning applications. In this instance, the relevant development plan documents include:
 - Adopted Core Strategy Development Plan Document (January 2010) (CS)
 - Wokingham Borough Managing Development Delivery Local Plan (February 2014) (MDD)
 - Arborfield and Barkham Neighbourhood Plan (April 2020) (ABNP)
- 5.7 The Government’s Planning Policy for Traveller Sites (PPTS) set out the Government’s aims in respect of Traveller sites. This includes at paragraph 4 a requirement *“to ensure that local planning authorities, working collaboratively, develop fair and effective strategies to meet need through the identification of land for sites.....to promote more private traveller site provision while recognising that there will always be those travellers who cannot provide their own sites...and... to increase the number of traveller sites in appropriate locations with*

planning permission, to address under provision and maintain and appropriate level of supply”

- 5.8 **Policy CP2: Inclusive Communities** of the CS states in order to contribute to the provision of sustainable and inclusive communities to meet long term needs, planning permission will be granted for proposals that address the requirements of (amongst other things) the specific identified needs of minority groups in the borough, including Gypsies, Travellers and Travelling Showpeople and black and minority ethnic groups. Proposals for Gypsies, Travellers and Travelling Showpeople (including allocations in other Development Plan Documents) will demonstrate that:

"i) The site is located either within or close to the development limits of a settlement in policy CP9 in order to maximise the possibilities for social inclusion and sustainable patterns of living; and

ii) The proposed site is not disproportionate to the scale of the existing settlement whether singly or cumulatively with any existing sites in the area”.

- 5.9 **Policy TB10: Traveller Sites** of the MDD is also relevant to this application. This policy states that planning permission may be granted for new gypsy and traveller pitches where it can be demonstrated that:

a) The site is located in the Borough’s existing settlements or is adjacent to an existing settlement either within or adjacent to the Borough;

b) Avoids impacting on the separate identity of settlements;

c) The site has access to a range of local services such as shops health facilities including doctors, schools, and a range of amenities including play areas and other recreation facilities;

d) No significant barriers to development exist in terms of flooding, poor drainage, poor ground stability or proximity to other hazardous land or installations where conventional housing would not be suitable;

e) Unacceptable impacts on the character and appearance of the surrounding landscape will be minimised through the sensitive and appropriate design of the scheme;

f) The proposals will not result in an unacceptable loss of amenity of neighbouring land uses;

g) Mixed use proposals (which are sites that include a business use) will only be considered if appropriate to the locality and such uses will not result in an unacceptable loss of amenity;

h) The scheme avoids any adverse impacts on the Special Protection area.

5.10 It should be noted that the Arborfield and Barkham Neighbourhood Plan is silent on the provision for the creation of new pitches.

5.11 The application site is well related to the existing authorised Gypsy/Traveller site at Highfield Park, ensuring that the proposal is integrated with an established community and contained within a defined setting, thereby limiting impact on the wider countryside. The modest scale of the proposal, limited to one pitch, ensures that it is proportionate and does not undermine the overall spatial strategy, whilst directly contributing to meeting an identified local need.

5.12 Furthermore, the site benefits from good accessibility to services and facilities in Arborfield Cross, supporting the Core Strategy's aims of creating inclusive, sustainable, and balanced communities.

- 5.13 The fact that the site is c.125m Northwest of the Arborfield Garrison Strategic Development Location means the site has access to a range of local services and local amenities. The site is located close to the development limits of a settlement in policy CP9 which maximises the possibilities for social inclusion and sustainable patterns. Therefore, the site complies with Policy CP2 in this instance.
- 5.14 The site does not feature any significant barriers to development, it is noted that section R24 of the Borough Design Guide (BDG) seeks for caravans to not be sited under overhanging trees. The provided plans detail that no tree canopies overhang either pitch.
- 5.15 The proposed application does not comprise a mixed use and the applicant is willing to enter into a S106 Agreement to provide appropriate SANG/SAMM contributions to adverse any impacts to the Thames Basin Heath SPA.
- 5.16 As such, it is considered the proposed development complies with policies CP2 of the CS and TB10 of the MDD.
- 5.17 Turning to the development plan, it should be noted that it is normal for a Development Plan to have policies that “pull in different directions” (R v Rochdale Metropolitan Borough Council, ex parte Milne [2000] EWHC 650). The Rochdale judgement explicitly found that to comply with a Development Plan ‘as a whole’ does not mean there is a requirement to comply with every relevant policy that applies (see paragraphs 48-50 of the judgement). This should be at the forefront of the Officers decision making in this application.
- 5.18 Prior to the consideration of individual policies it should be noted that Policy CC01 – Presumption in Favour of Sustainable Development of the MDD replicates the paragraph 11 presumption in the Framework, and therefore, when considering whether policies are out of date –

compliance with CC01 would mean the development would still be in accordance with the Development Plan as a whole.

- 5.19 **Character and Appearance of the Area:** Policies CP1 and CP3 seek for development to maintain or enhance the high quality of the environment and ensure development is on an appropriate scale of activity, mass, layout, built form, height and materials and character to the area.
- 5.20 Paragraph R24 of the BDG states: the layout and design of Gypsy sites should provide a safe living environment that meets the needs of residents, while respecting the character of the local area.
- 5.21 It is acknowledged the application site does not comprise previously developed land and is absent from development, sited within on the edge of a settlement. However, the site is not set within a Valued Landscape. The site itself is to be enclosed by low level timber boundary treatment with hedgerows and trees screening the proposed development. It must be noted that the site is not visible from the main road (A327) due to the road layout and the presence of mature trees lining the carriageway.
- 5.22 The proposed change of use has been carefully designed to respect the character and appearance of the surrounding area. The site is modest in scale and is located directly adjacent to the existing authorised Gypsy/Traveller site at Highfield Park, ensuring that the development sits within an established context rather than appearing as an isolated intrusion into the countryside.
- 5.23 The existing hedgerows and mature trees along the A327 will remain untouched as well as proposed vegetation and boundary fencing will be installed and reinforced to provide natural screening, helping the proposal remain visually unobtrusive in longer views. The limited built form, restricted to a single caravan and associated hardstanding,

ensures the proposal does not overwhelm the landscape or alter the prevailing edge of settlement character of the locality. Accordingly, the development integrates appropriately with its surroundings and preserves the overall character and appearance of the area.

- 5.24 **Residential Amenity:** Policy CP3 of the CS and TB10 of the MDD seeks for development to be without detriment to the amenities of adjoining land users and occupiers.
- 5.25 Paragraph R24 of the BDG provides key considerations for site layout to provide an acceptable standard of residential amenity including: a degree of privacy for individual households whilst maintaining a sense of community and maintaining a 6m separation distance between caravans.
- 5.26 The proposed development has been designed to safeguard the residential amenity of both future occupiers and neighbouring residents, in accordance with Policy CP3 of the Wokingham Borough Core Strategy and the Borough Design Guide (R24). Policy CP3 requires development to protect the amenity of adjoining land uses and to ensure a high-quality living environment. The modest scale of the proposal, limited to a single pitch, avoids overdevelopment and provides sufficient private space for day-to-day living needs, including outdoor amenity and vehicle parking.
- 5.27 The siting of the caravan within the plot, together with proposed boundary vegetation, ensures appropriate separation from surrounding land uses, thereby minimising any potential for overlooking, overshadowing, or undue noise and disturbance. Consistent with the guidance in paragraph R24, the layout provides a safe and healthy environment for occupiers, while ensuring the development integrates positively with its surroundings. As such, the proposal achieves a balance between delivering much-needed

Gypsy/Traveller accommodation and safeguarding residential amenity in line with both local policy and design guidance.

- 5.28 **Trees and Landscaping:** Policy CC03 of the MDD states development proposals should demonstrate how they have considered and achieved a number of criteria into proposals including how they protect and retain existing trees, hedges and other landscape features and incorporate native planting and landscaping as part of a scheme.
- 5.29 Policy TB10: Traveller Sites of the MDD outlines at point e that permission may be granted where it can be demonstrated that unacceptable impacts on the character and appearance of the surrounding landscape will be minimised through the sensitive and appropriate design of the scheme.
- 5.30 Paragraph 27 point d of the PPTS ensures that proposals are not enclosing a site with so much hard landscaping, high walls or fences, that the impression may be given that the site and its occupants are deliberately isolated from the rest of the community.
- 5.31 The proposal does not involve the removal of any existing trees, as the site currently contains no significant arboricultural features. Instead, the scheme incorporates the introduction of a new boundary planting structure comprising a mix of fencing, native hedgerow, and trees. This approach will establish a strong, attractive edge to the site, providing long-term screening, biodiversity benefits, and a softened interface with the surrounding landscape. The planting will be designed and implemented in accordance with best practice, ensuring species selection and spacing contribute to both ecological resilience and visual integration. Once established, the proposed trees and hedgerows will play a key role in assimilating the development into its rural setting and enhancing the character of the

locality. Any tree planting and landscaping details can be secured and controlled through planning conditions, ensuring delivery and proper management.

- 5.32 **Transport and Parking:** Paragraph 116 of the NPPF sets out the test that a determining authority should apply when determining the suitability of a planning application in terms of transport and highways stating 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 would be severe.'*
- 5.33 The proposed development would utilise the existing hardstanding currently in place that serves access to the neighbouring Highfield Park site, with a separate access gate proposed on the Eastern side of this, to provide access to the application site.
- 5.34 The layout provides sufficient turning space within the site to allow vehicles to enter and exit in a forward gear, thereby maintaining highway safety. Adequate parking provision is made on-site for residents ensuring there is no reliance on or overspill onto the public highway. The site is located close to Arborfield Cross, where essential services and facilities can be accessed, thereby reducing the need for long-distance travel and supporting the principles of sustainable development. As such, the proposal accords with the transport and parking requirements ensuring the safe and appropriate use of the land without adverse impact on the surrounding road network.
- 5.35 **Refuse Provision:** It is anticipated that a refuse provision can be provided adjacent to the site accesses, within the site boundary. This can be secured by condition to require refuse to be stored here at all times and to provide details of a collection point/bin store.

- 5.36 **Drainage and SuDS:** The site falls within Flood Zone 1 and is not considered to be at risk of flooding. The proposed development would not provide any operational development beyond hardstanding. A planning condition can be attached to require this to be permeable and provide construction details if necessary.
- 5.37 **Ecology/Biodiversity Net Gain:** The statutory Biodiversity Net Gain (BNG) requirements have been considered in respect of the proposed development. From 6 August 2026, an exemption from mandatory BNG applies to planning applications for development where the site area within the red line boundary is 0.2 hectares or below.
- 5.38 The application site extends to less than 0.2 hectares and therefore falls within this exemption. Accordingly, the proposed development is not subject to the mandatory requirement to deliver a minimum 10% Biodiversity Net Gain and a Biodiversity Gain Plan is not required.
- 5.39 The exemption is subject to the development not negatively impacting any on-site priority habitat. There is no identified priority habitat within the application site that would be negatively impacted by the proposed development. On this basis, the development is considered exempt from the statutory BNG requirements.
- 5.40 **Contamination:** A phase 2 chemical and contamination assessment report, prepared by Jaxx Engineering Consultancy, accompanies this submission (**Appendix 11**). This concluded that the site would be classified as low to negligible risk. Due to the low chemical concentrations identified, any excavated material at this site may pose a 'low' hazard to ground workers as far as Health and Safety is concerned.

- 5.41 **Special Protection Area:** The application site is within 5km of the Thames Basin Heath SPA. The applicant is willing to enter into a legal agreement to provide the appropriate financial contribution to mitigate the introduction of no.1 residential pitch.
- 5.42 **Material Considerations:** Should the LPA consider the development is does not accord with the Development Plan as a whole, it is considered that there are material considerations to be considered to resolve in favour of granting a planning permission.
- 5.43 As previously stated, the PPTS is a material consideration for the determination of this application. Should there be any conflict in relation to the location of the site it should be noted the PPTS implicitly accepts pitches in edge of settlement locations regardless of proximity to facilities and services. As such, should the LPA consider there to be any policy conflict owing to the location of the site on the edge of a settlement ,the weighting to this conflict can only be considered limited at most, this would also include any visual impact to the countryside (it is implicitly accepted this form of development will come forward in these locations and therefore the development of a site which does not comprise PDL is also accepted).
- 5.44 **Need:** Notwithstanding the compliance with CP2 and TB10 of the Development, it should be noted the Council have recently updated their Gypsy and Traveller Accommodation Assessment in 2023. It should be noted that the GTAA requires the Borough to deliver 86 pitches (cultural need) up to 2039/40 and required an immediate short term (over the next 5 years) need of 35 pitches.
- 5.45 The Council cannot demonstrate a 5-year supply of pitches, the granting of the permission for no.1 pitch would contribute to the Council's current shortfall which would weigh in favour of the development.

- 5.46 **Efficient Use Of the Land:** Paragraph 129 of the NPPF supports decisions that make an efficient use of land taking into account the identified need for development and the availability of land suitable for accommodating it; the availability and capacity of infrastructure and services (existing and proposed) and the desirability of maintaining an areas prevailing character.
- 5.47 In the context of the current shortfall of G&T pitches it is apparent that pitches are going to need to come forward across the borough and likely in edge of settlement or countryside locations. The current application would look to effectively extend an existing lawful site which is in a location adjacent to an SDL as supported by CP2 and MD10 of the Local Plan.
- 5.48 The application provides an opportunity to optimise the use of the site to meet the Borough's need without any detrimental character or landscape harm to more sensitive areas such as the countryside.

6. Conclusion

- 6.1 This statement has demonstrated that the proposed development is acceptable in principle and makes an efficient use of land.
- 6.2 Material planning considerations have been carefully considered and analysed, as evidenced in section 5 of this statement and the supporting plans and documents. It is considered the proposed provision of no.1 pitch would contribute an appropriate site to aid in the Councils shortfall of sites, whilst having no adverse effect on the character of the area or the amenity of neighbouring residents.
- 6.3 It is considered that the proposed scheme complies with relevant Development Plan Policies and is further supported by National

Guidance. Therefore, it is respectfully requested that planning permission is granted.



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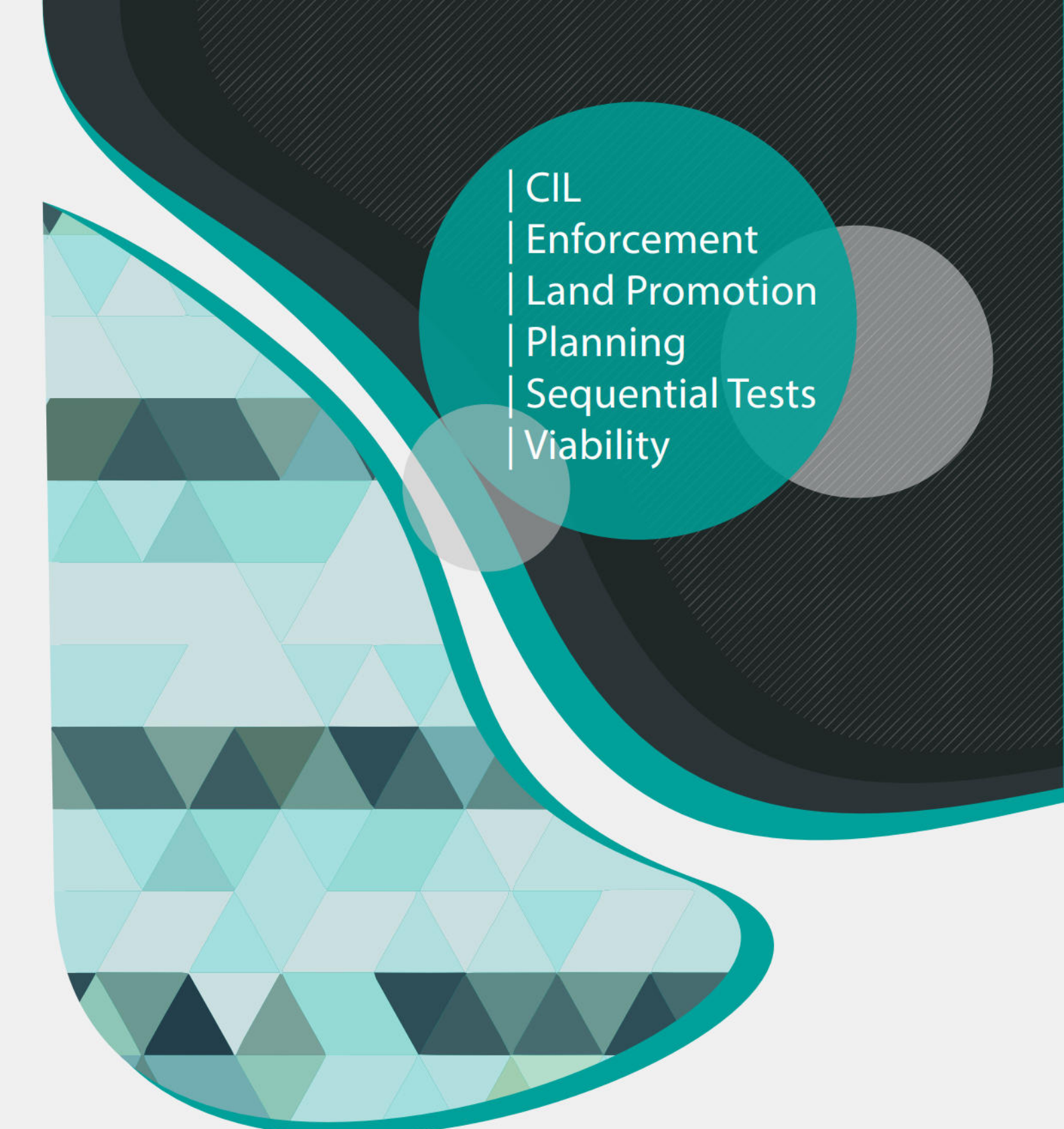


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