
PROOF OF EVIDENCE: PLANNING MATTERS

**Prepared by Mrs Brigid Taylor MSc LLB
MRTPI PISEP MIEEnvS**

**LAND NORTH OF READING ROAD,
ARBORFIELD**

**Appeal against the decision of Wokingham
Borough Council to refuse outline planning
permission for up to 111no. dwellings with
associated works, parking, landscaping,
publicly accessible open space, with access
from Reading Road (All matters reserved save
for means of access).**

Prepared by: Woolf Bond Planning Ltd

On behalf of:

Dandara Southern Ltd and Elstree Land Ltd

PINS Ref: TBC

LPA Ref: 243099

WBP Ref: 9015

November 2025



Woolf Bond Planning
Chartered Town Planning Consultants

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QUALIFICATIONS AND EXPERIENCE

Brigid Taylor will say:

I hold a Master of Science Degree in Spatial Planning and Development (Distinction), a Bachelor of Science Degree (Ecology) and a Bachelor of Laws Degree. I am a Chartered Member of Royal Town Planning Institute, a Practitioner Member of the Institute Sustainability and Environment Professionals and a Full Member of the Institute of Environmental Science. I am also a qualified solicitor (currently non-practising).

I am an Associate Director at Woolf Bond Planning Ltd, a firm of Chartered Town Planning Consultants. I have been engaged in the planning and development industry for over 23 years; initially practising as a planning solicitor for a period of some nine years (2003 – 2010) before moving into planning and environmental consultancy in 2010. Since that time I have advised and acted for a range of clients including residential house building companies, private landowners and care home developers. Examples of the range of projects I advised on include a number of large scale edge of settlement greenfield development proposals across the south of England (for clients such as Taylor Wimpey, Fairfax and Croudace Homes), C2 care home proposals across the south east of England, a proposal for the redevelopment of a brownfield former power station site in Hampshire to create a new community of circa 1500 homes, and a number of proposals of tall buildings/mixed use development in London (including a mixed use proposal for up to 5,000 dwellings in Newham, proposals for redevelopment at Greenwich Peninsula, and proposals for redevelopment of a derelict 16ha site on the Thames in Lewisham) and Hertfordshire (Watford).

In recent years I have appeared at a number of s78 planning inquiries, hearings and Local Plan Examinations.

My involvement with this Appeal Site dates to September 2024. During that time I have provided planning advice in relation to the evolution of the scheme design. I instructed the consultant disciplines as part of the preparation of the planning application and am well versed in the planning policy position in Wokingham.

I have visited the Appeal Site and its surroundings on numerous occasions and I have examined the relevant plans and documents for the purpose of the appeal.

The evidence which I have prepared and provide for the appeal hearing (in this Proof of Evidence) is true and has been prepared, and is given by me, in accordance with the guidance of my professional institution and I confirm that the opinions expressed are my true and professional opinions.

1.0 Introduction and Overview

General

- 1.1. This Proof of Evidence been prepared in support of an appeal (“the Appeal”) by Dandara Southern Ltd and Elstree Land Ltd (“the Appellant”) against the decision of Wokingham Borough Council (“the Council”) to refuse their outline application (“the Application”) for the proposed erection of up to 111 no. dwellings with associated works, parking, landscaping, publicly accessible open space and access from Reading Road (LPA Ref: 243099) (“the Application Scheme”, now “the Appeal Scheme”) on land north of Reading Road, Arborfield (“the Application Site”, now the “Appeal Site”). All matters other than access are reserved.
- 1.2. The Appellant issued a notice of an intention to submit an appeal to PINS and the Council on 10 July 2025 and the Appeal was submitted on 14 August 2025. At the point of submission the Appellant sought that the Appeal be determined via the Inquiry procedure; the Statement of Case submitted on that date was prepared on that basis. The Planning Inspectorate have subsequently advised that the Appeal may be determined via hearing rather than Inquiry. As a result, the Inspectorate advised that the Appellant was able to submit additional information in support of its Statement of Case, within the 6 month appeal submission timeframe.
- 1.3. Accordingly, this Proof of Evidence is now submitted in order to more fully set out the Appellant’s case, and my planning evidence, in full. It should be read alongside the Proofs of Evidence of Mr Graham Ritchie (on housing land supply and affordable housing needs), Mr Matthew Stevens (on highways and accessibility matters), Mrs Clare Brockhurst (on landscape and visual impact matters) and Mr Peter Ruskins (on arboriculture). In addition, appended to this Proof is a statement by Mr Sam Watson addressing ecological considerations.
- 1.4. The initial Statement of Case (CD4.1) was accompanied by a draft Statement of Common Ground (“SoCG”) (CD5.1); the Appellant will continue to seek agreement with the Council on a series of topic-based SOCGs and also draft

conditions and a final list of Core Documents (a draft of the latter having been circulated by the Appellant with their Proofs) .

The Council's Decision to Refuse Planning Permission

1.5. The Application was refused on 20 May 2025, under delegated powers (Decision notice provided at CD3.1). whilst there were 10 reasons for refusal in total, only reasons 1-6 represent substantive issues for the purposes of this appeal. The remaining reasons 7-10 are matters which can adequately be dealt with via the submission of an acceptable s106 planning obligation. The reasons for refusal were as follows:

- *Reason for Refusal 1 - The principle of development:* "The location of this unplanned development on a greenfield site in the countryside is unacceptable in principle due to the countryside location outside of settlement boundaries; it's appreciable detachment from any recognised settlement limits and the resulting quantum of development that would be substantially out of scale with the immediate locality. The development conflicts with the spatial objectives of the development plan and policies CP1, CP2, CP3, CP6, CP9 and CP11 of the Core Strategy, CC01, CC02 and TB21 of the MDD Local Plan, Policies IR1, IR2 and AD1 of the Arborfield and Barkham Neighbourhood Plan, the Borough Design Guide SPD and sections 2, 4, 8, 9, 12 and 15 of the NPPF."
- *Reason for Refusal 2 – Quantum and Scale of Development:* "The proposed location and quantum of development would result in a development with a scale, character and density that is out of keeping with character and appearance of the area and countryside, resulting in a harmful detrimental impact on the locality, contrary to policies CP1, CP3, CP9 and CP11 of the Core Strategy, CC02, CC03 and TB21 of the MDD Local Plan, IR2, AD1 and AD3 of the Arborfield and Barkham Neighbourhood Plan, the Borough Design Guide SPD and sections 2, 4, 8, 9, 12 and 15 of the NPPF"
- *Reason for Refusal 3 - Impact on the landscape and countryside:* "The proposed development will have a detrimental impact on the landscape and character & appearance of the area by reason of the loss of fields, paddocks

and green infrastructure in the countryside and the erection of a large housing development that is out of keeping with the locality, contrary to policies CP1, CP3, CP9 and CP11 of the Core Strategy CC02, CC03 and TB21 of the MDD Local Plan, IR2, AD1 and AD3 of the Arborfield and Barkham Neighbourhood Plan, the Borough Design Guide SPD, the Wokingham District Landscape Character Assessment and sections 12 and 15 of the NPPF.

- *Reason for Refusal 4 - Unsustainable Location:* “The application site is within an unsustainable location that would not encourage a modal shift towards sustainable modes of transport, by reason of the countryside location outside of settlement limits, distances to facilities and services and poor quality of the local walking environment, contrary to policies CP1, CP2, CP3, CP6 and CP11 of the Core Strategy, Policies CC01 and CC02 of the MDD Local Plan, the Borough Design Guide SPD and section 8 & 9 of the NPPF.
- *Reason for Refusal 5 - Best and Most Versatile Agricultural Land:* “Part of the site is grade 3a Agricultural Land and therefore the development results in the loss of Best and Most Versatile agricultural land, contrary to Core Strategy policy CP1 and section 15 of the NPPF.”
- *Reason for Refusal 6 - Impact on Main River Watercourse:* “Part of a main river runs along the southern boundary and insufficient information has been submitted to demonstrate that the proposed development will not adversely impact on flood risk or the watercourse, contrary to policy CC10 of the MDD Local Plan, CP1 and CP3 of the Core Strategy, AD4 of the Arborfield and Barkham Neighbourhood Plan and section 14 of the NPPF.”
- *Reason for Refusal 7 – Avoidance and Mitigation of Impacts on the Thames Basin Heaths SPA:* “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.”

- *Reason for Refusal 8 – Section 106 Planning Obligation:* “In the absence of a completed legal agreement, the proposal fails to secure opportunities for training, apprenticeships, and other vocational initiatives to develop local employability skills contrary to MDD Policy TB12.
- *Reason for Refusal 9 – Section 106 Planning Obligation:* “In the absence of a completed Legal Agreement, the scheme fails to make adequate provision for affordable housing, contrary to policy CP5 of the Core Strategy and Section 5 of the NPPF.
- *Reason for Refusal 10 – Section 106 Planning Obligation:* “In the absence of a completed Legal Agreement, the proposed development fails to make adequate contributions to sport and recreational facilities, contrary to MDD Local Plan policy TB08, Core Strategy policy CP4 and sections 4 and 8 of the NPPF.”

Summary of this Proof

Housing Land Supply Shortfall and Affordable Housing Needs

- 1.6. Wokingham is a borough with only 2.3 years’ housing land supply and significant levels of unmet need for both market and affordable housing. There is a shortfall of 3,733 dwellings in the 2025-2030 five-year period with a deliverable supply of only 3181 dwellings against a requirement for 6914. Freedom of Information Act request responses show that there are 669 requests for an affordable home in Arborfield. There is significant unmet and growing demand for affordable housing in Arborfield & Newland parish, and there is very significantly greater demand for affordable homes in Arborfield & Newland Parish compared to the Borough as a whole.
- 1.7. This appeal proposes the delivery of up to 111 dwellings in a sustainable location, in Arborfield, which benefits from access to a range of services and facilities within walking/cycling distance and also via the good quality existing

bus service which serves the Site. The Site represents an ideal opportunity for reducing the significant scale of the housing (including affordable housing) shortfall.

Spatial Matters: The Principle of Development

- 1.8. Although there is a degree of conflict with the Development Plan, the weight to be attached to this conflict is limited. In particular, the proposal conflicts with the settlement boundaries established under policies CP9 and CP11 of the Core Strategy ("CS"), CC02 of the Managing Development Delivery Local Plan ("MDD") and AD1 of the Arborfield and Barkham Neighbourhood Plan ("NHP"). The weight afforded to this conflict is limited because (i) the development plan is out of date in terms of the spatial application of its housing policies¹; and additionally, (ii) the Council is unable to demonstrate a five-year supply of deliverable housing land.
- 1.9. Either of scenarios (i) or (ii) above triggers the presumption in favour of sustainable development at paragraph 11(d) of the NPPF. In so far as there are no strong reasons for refusal at paragraph 11(d)(i) of the NPPF, the Appeal falls to be positively assessed under paragraph 11(d)(ii).
- 1.10. The adverse impacts of granting planning permission relating to (a) development beyond a defined settlement boundary (delineated in an out-of-date development plan), (b) localised landscape impact; and (c) loss of agricultural land, would not significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination
- 1.11. Whilst detached from any defined settlement limits in the out-of-date spatial strategy, the Site is in fact adjacent to development on three sides (to the north,

¹ These policies are frustrating the delivery of identified housing needs, as recognised recently by the Inspector in Appeal Reference APP/X0360/W/24/3354667 - Land adjacent to Blagrove Lane, Wokingham RG41 4AX, decided 29 May 2025, paragraph 20.

west and south, as set out in the Council's landscape architect's response (CD2.22). It is adjacent to Arborfield (as distinct from 'Arborfield Cross'), which is a settlement in its own right (and is the historic core of the village) as confirmed in the NHP (CD6.3) and Village Design Statement (CD6.4). As such, whilst detached from defined *settlement limit* (a policy tool), the Site is not detached from a *settlement* as actually in existence on the ground.

- 1.12. The current settlement limits defined in the Development Plan cannot be maintained in their current position if identified market and affordable housing needs are to be met. The Local Plan Update Submission Plan (CD6.13), currently undergoing examination, clearly evidences this fact. It proposes significant new allocations in the countryside in order to address identified housing needs. One of the proposed allocations is in close proximity to this Appeal Site and an application has not been submitted to bring forward development on that site². These factors are material considerations of significant weight in the consideration of this Appeal.
- 1.13. As the most important policies (relating to housing delivery, and the spatial application of housing policies) are out of date (due to failure to meet identified housing needs, and therefore inconsistency with the NPPF, and also due to the inability to demonstrate a five year supply of deliverable housing land – see CD6.22), the presumption under paragraph 11(d) of the NPPF is engaged. There are no footnote 7 matters which provide any strong reason for refusal for the purposes of paragraph 11(d)(i) NPPF.
- 1.14. As explained above, applying paragraph 11(d)(ii) of the NPPF, the adverse impacts of granting planning permission would not significantly and demonstrably outweigh the benefits when assessed against the policies in the NPPF taken as a whole.
- 1.15. The Appeal Scheme conflicts with the settlement policy boundaries identified under Policies CS CP9, CP11, CC02 of the MDD and AD1 of the NHP, which attracts **limited** weight. It will also result in the loss of a very small area of good quality agricultural land, in conflict with Policy CP1, which attracts **very limited**

² Wokingham Application Reference 252498

weight, as well as inevitably change the landscape character of the site, in conflict with parts of CC03, TB21 and IRS2. This also attracts **moderate** weight in the planning balance.

- 1.16. Set against this, there are substantial economic and social benefits and moderate environmental benefits which clearly outweigh the potential harm.
- 1.17. The Appeal Scheme will deliver up to 111 dwellings which makes a significant contribution to the housing shortfall. This includes up to 44 affordable dwellings in an area of high demand for the same. These factors are afforded **substantial** weight.

Quantum and Scale of Development

- 1.18. The proposed quantum of this outline scheme can be comfortably accommodated on the Site at a density (28dph net) which makes efficient use of the Site whilst minimising impacts on character of the prevailing area. It is recognised that the prevailing density along Church Road (characterised by large detached dwellings in large plots) is lower than the proposal but delivering new development at such low density would fail to accord with national policy which seeks to make efficient use of land, particularly on sites with such good sustainability credentials (with access to a premium bus service).

Landscape Impact

- 1.19. Whilst a change in landscape character is unavoidable, the changes will relate to the landscape and townscape context associated with the Site. Furthermore, the Site is not identified as being a valued landscape in the Council's evidence base, following scrutiny of the landscapes present within the borough. Given the vast extent of land which is proposed for such designation in the emerging Local Plan (CD6.13 and CD6.19) it is clear that development of the Site will avoid other more valued and sensitive parts of the borough's countryside. Given the extent of the housing shortfall (CD6.22) this is material. Visual impacts will be limited and localised.

- 1.20. As accepted elsewhere in this proof of evidence, policies CP9, CP11, CC02

and AD1 (referenced in regard to reason for refusal 3 as well as reason 1) are not met due to the Site's location beyond the settlement boundary. As detailed below Policy CP1 is also not met due to the loss of BMV land.

- 1.21. Policy CP1 also requires that the high quality of the environment be maintained or enhanced. As detailed in the Proof of Evidence of Mrs Clare Brockhurst, important landscape features have been identified, (including the trees, hedgerows, grassland and grain and form of the contemporary settlement edge) and key features have been retained and incorporated in to the proposals, which addresses the requirements of CP1, CP3. Policy TB21 requires that proposals retain or enhance the condition, character and features that contribute to the landscape; whilst the most important features are retained/enhanced, there are some limited tree losses in order to create the site access (and elsewhere within the Site – as detailed in the evidence of Mr Peter Ruskins) so the requirements of TB21 are not fully met (although replacement planting will offset this impact in time).
- 1.22. New landscape measures are proposed to enhance the condition and functionality of the landscape and increase the diversity of landscape assets in a positive manner. The proposals adhere to the Council's guidelines in respect of Green Infrastructure delivery (Policy CC03) but it is noted that that policy contains a general restraint against the loss, fragmentation or isolation of areas of green infrastructure. As such, there is a degree of conflict with this policy given the landscape would change from greenfield to developed site.
- 1.23. There will be no erosion of the physical, visual or perceptual gap between the settlements for the purposes of Policy IRS1 as the character and appearance of the landscape beyond the Appeal Site and within the gap towards Arborfield Cross will remain as farmland with farm buildings.
- 1.24. Policy IRS2 requires that the identity and rural setting of settlements be preserved, with respect to scale and form of the development, density, materials, tree and hedgerow planting and the distinctive character of the landscapes of the borough and outstanding views. At reserved matters stage further detail will be developed on the scale and massing and landscape strategy for the proposals. The masterplan shows that the development plots

are set within a generous landscaped/open space with additional tree planting. The evidence of Mrs Brockhurst confirms that the Site is visually well contained, and there will be no impacts on the views identified in the NHP. Therefore, whilst development on an undeveloped Site has the potential to change the setting of the nearby settlement, the generous open buffers will assist in limiting harmful effects.

- 1.25. Policy CP3 also requires the provision of open space and amenity space in accordance with the specified standards and these are met and exceeded. 12,660m² of public open space is delivered on the part of the Site to the east of the 'Main River' which runs broadly north-south to the west. This exceeds the policy requirement for 12,412m² based on the projected new population.
- 1.26. The landscape and visual harms are afforded **moderate** weight.

Locational Sustainability

- 1.27. The Site benefits from a premium bus service with regular services to Reading and Wokingham throughout the week including Sundays. The Site is a walkable/cyclable distance to the local primary school at Arborfield Cross (approximately 1km by road, with footpath for the full extent) and the nearest secondary, Bohunt at Arborfield Green, is 3.5km by road. The Site is a sustainable location for new development. This point was accepted by the Highway Authority (CD2.18, 2.18 and 2.19). As set out in the Proof of Evidence of Mr Matthew Stevens on highways matters, the Highway Officer was satisfied that the site is well located to regular bus services and the package of improvements and contributions offered would aid in improving the sustainability of the Site. The Appeal Site is conveniently located to a range of facilities and services which cater for educational, healthcare, leisure and convenience needs of future residents.
- 1.28. The Appellant also proposes to deliver infrastructure upgrades (including safe crossing facilities, a widened footway and street lighting along Reading Road) to further improve the physical and functional connectivity of the Site. Pending application 252498 also proposes to deliver a new district centre, two primary schools and secondary school within close walking distance of the Site

(CD13.3 and CD13.7). In the eventuality that that application is approved (noting it is a proposed allocation in the emerging Local Plan Update and the Council's housing trajectory contemplates housing coming forward by 2027 on that site), the context (and accessibility) of this Appeal Site will warrant further consideration.

- 1.29. In summary, the Appeal Scheme meets the requirements of Policies CP1, CP2, CP3, CP6, CC01. It is accepted that the proposal conflicts with Policies CP11 and CC02 (which relates to the location between settlement limits, as addressed above in respect to reason for refusal 1 – principle of development).

Agricultural Land

- 1.30. Only a 0.7ha parcel of land within the 6.44ha Site (10.8%) qualifies as 'Best and Most Versatile' (BMV) Agricultural Land (at Grade 3a) (CD1.33). **Very limited weight** should be afforded to its loss, despite the conflict with Policy CP1 (which seeks to avoid loss of BMV land), consistent with the approach taken by the Council on other schemes nearby. The Site is not in active agricultural use, and 0.7ha could not be economically used for agriculture in an efficient manner. Furthermore, this higher quality part of the Site will remain undeveloped as green infrastructure.
- 1.31. It is noted that in the recent appeal APP/X0360/W/25/3364304)(CD10.6), half of that appeal site (so, approximately 5.3ha of the 10.5ha site) was grade 3a BMV Land not forming part of any active agricultural operation. Its loss was given only limited weight given there would be no material reduction in food production as a result.
- 1.32. Therefore, the conflict with Policy CP1 is afforded **very limited weight**.

Flood Risk and Drainage

- 1.33. A Flood Risk Assessment and Drainage Strategy was submitted with the Application (CD1.15) (supported by hydraulic modelling (CD1.23)) and it was demonstrated that the proposal would not increase flood risk off the site or give rise to any safety issues. The Council's Drainage officer's response to the

application (CD2.11) confirms they had no objection to the proposals, subject to imposition of a condition securing more detailed drainage proposals at reserved matters stage.

- 1.34. Whilst the reason for refusal relates to flood risk, the associated discussion in the officer report (CD3.2) appears to relate to matters which are covered by the Environmental Permitting regime. Creation of the access over the 'Main River' drainage ditch along the southern site boundary will require a permit, to ensure no unacceptable impact on water quality. Such matters are effectively dealt with via the permitting regime and there is no need to duplicate regulatory control via the planning system.
- 1.35. No conflict arises in respect of Development Plan Policies CP1, CP3, CC10, AD4 nor section 14 of the NPPF.

Planning Obligations

- 1.36. As set out in section 7 below, the Appellants will negotiate with the Council an appropriate planning obligation mechanism under the provisions of Section 106 of the Town and Country Planning Act 1990 to resolve Reasons for Refusal 7 to 10.

Summary

- 1.37. It is accepted that the Appeal Scheme conflicts with the out-of-date settlement policy boundaries (CP9, CP11, CC02 and AD1), the requirement to avoid the loss of BMV (CP1) and landscape policies which seek to retain the rural setting to settlements (IRS2) and landscape features (CC03; TB21), and is in conflict with the development plan when taken as a whole. However, there are weighty material considerations (including the tilted balance under NPPF paragraph 11(d)) which support the grant of planning permission for the development of much needed homes (including affordable), in a sustainable location within walking/cycling distance of both a primary and secondary school, and on a premium bus route, offering regular bus services to Reading and Wokingham. The adverse effects of the proposal do not significantly and demonstrably outweigh the benefits and as such, planning permission ought to be granted.

2. The Appeal Site and Surrounding Area

The Appeal Site

- 2.1. Extending to approximately 6.44ha, the Appeal Site is shown edged red on the Site Location Plan (Reference 052403-DAN-LOC01) (CD1.5).
- 2.2. The Appeal Site comprises privately owned fields, a paddock, and a caravan storage area. The Site boundaries are demarked by hedgerows and mature trees to the east, west and south with residential development abutting the northern and part of the southern boundaries.
- 2.3. There is an existing private pedestrian and vehicular access point to the Appeal Site from Reading Road; this is proposed to be repositioned slightly further east to ensure safe and suitable access for the proposed development.
- 2.4. A watercourse traverses the western part of the Appeal Site and thereafter runs along the southern Site boundary, parallel to Reading Road. This watercourse is classified a Main River by the Environment Agency. As such, an 8m maintenance strip has been allowed for in the illustrative masterplan proposals (CD1.9).
- 2.5. The Multi Agency Geographic Information for the Countryside Map ('MAGIC') and the Proposals Map indicates that the Site is not covered by any statutory designations for landscape character or quality.
- 2.6. The Site is within the Zone of Influence around Thames Basin Heaths Special Protection Area ("SPA") and accordingly there is a requirement to mitigate the risk of additional recreational pressure on that SPA via contribution to Suitable Alternative Natural Greenspace ("SANG").
- 2.7. The Site is not within any Conservation Areas and there are no Listed Buildings on the Site itself (the nearest being two Grade II listed buildings located to the northwest and northeast of the site on Church Lane, Arborfield). In accordance with sections 66(1) and 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 ("the LBCA Act"), the masterplan approach has

paid special regard to the desirability of preserving the wider setting of those listed buildings potentially affected by the proposals, as well as any features of special architectural or historic interest which they may possess.

Locational Context

- 2.8. The surrounding area is semi-rural in character with bands of residential development set back from the highway within leafy frontages.
- 2.9. Views into the Appeal Site from public viewpoints are generally limited to glimpsed views from Reading Road and Church Lane, due to the well-vegetated Site boundaries and surrounding built form. Additionally, there are some localised viewpoints into the Site from adjoining properties along Church Lane, to the north of the Site, although existing vegetation affords a degree of screening.
- 2.10. To the north and west of the Appeal Site is the historic settlement of Arborfield, characterised by a string of residential development along Church Lane. The Arborfield and Barkham Neighbourhood Plan (CD6.3) (which forms part of the Development Plan against which the acceptability of the Appeal Scheme is to be assessed) expressly identifies this historic core of Arborfield as a separate settlement in its own right (that is, separate to Arborfield Cross, which is the nearest settlement with a defined settlement boundary, or Arborfield Garrison further south. The Arborfield Village Design Statement (CD6.4) also takes a similar approach:

“Arborfield consists of a number of settlements that evolved over time. They are:

- 1. Arborfield Cross with the A327 running through its centre is a conservation area. It is the centre of the village, the Coombes school, public houses, local shops, the local park, and the Royal British Legion all being located there.*
- 2. Original Arborfield Village which incorporates Greensward Lane, Julkes Lane, Carters Hill and Church Lane, together with the Ruin of St Bartholomew church that dates back to 1200. The new church built in 1863 is also located in Church Lane.*
- 3. Arborfield Garrison where the most recent development has taken place is*

located to the south of the min village, east of the A327 and contains a variety of private and Ministry of Defence houses.”

- 2.11. As such, the Appeal Site is adjacent to and on the edge of the historic core settlement of Arborfield, which is identified in the Development Plan and the Village Design Statement as a settlement in its own right (albeit one which is not identified - in the out-of-date spatial strategy - as being suitable for additional development).
- 2.12. To the immediate south of the Appeal Site, on the opposite side of Reading Road, is existing residential development along Waldren Avenue and the Cross Lands Farm complex. Land to the immediate east of the Appeal Site is of open character associated with the Lockey Farm complex.

Accessibility

- 2.13. The Appeal Site is well related to existing surrounding urban environments. The nearby settlements of Arborfield Cross and Arborfield Green (including the Arborfield Garrison strategic development location) are walkable/cyclable from the Site, with local amenities including primary school, public house, convenience store and recreation ground available approximately 1km to the west of the Site at the settlement of Arborfield Cross.
- 2.14. The larger settlements of Wokingham and Reading are easily accessible by regular bus service. Bus route Leopard 3 (running between Reading and Wokingham) provides a regular service (Monday – Saturday 2-4 buses/hour from 06:05 to 23:36 and Sundays 2 buses/hour running from 08:39 to 21:44). There is an existing bus stop from which to utilise this service, adjacent to the Appeal Site's southern boundary.
- 2.15. Accordingly, the Appeal Site affords a sustainable location in which to meet identified housing needs. Further detail is set out in the Highways Statement submitted with this Appeal.

Context: Other Development Sites in the Locality

2.16. For ease of reference, I highlight at this juncture other sites in the immediate locality of Arborfield, and within Wokingham Borough Council's administrative area, where recent planning decisions set out material considerations in the determination of this appeal. These will be referred to in this Statement:

- Land to the north of School Road Arborfield Cross - LPA Ref 250735 – Wokingham's planning committee followed their officer's recommendation, and resolved to approve a scheme of up to 70 dwellings (subject to s106); (9 July 2025). (CD10.1)
- Land off Langley Common Road, Arborfield, Wokingham - LPA Ref 232490 – Wokingham's planning committee followed their officer's recommendation, and resolved to approve a scheme of up to 50 dwellings in the countryside between Arborfield Cross and Arborfield Green (subject to s106). The officer is the same officer who prepared the officer's report for the Appeal Scheme. (CD10.2)
- Land west of Trowes Lane and north of Charlton Lane, Swallowfield RG7 1RT (Appeal Ref: APP/X0360/W/24/3340006) (LPA Ref 230422) – Appeal determined July 2024, allowing a scheme of up to 81 dwellings. (CD10.3)
- Land adjacent to Blagrove Lane, Wokingham RG41 4AX (Appeal Ref: APP/X0360/W/24/3354667) (LPA Ref 222306) – Appeal determined May 2025, allowing a scheme of up to 350 dwellings and C2 care home. (CD10.4 and CD10.5)
- Land between Lodge Road and Tape Lane, Hurst RG10 0EG Appeal Ref: APP/X0360/W/25/3364304 LPA Ref: 242067 (dismissed appeal for up to 99 homes; the inspector found that failure of the Sequential Test in that case amounted to a footnote 7 'strong reason for refusal' which disengaged the tilted balance) (CD10.6)
- Land east of Hayes Drive and North of Church Lane, Three Mile Cross, Reading, Berkshire Appeal Ref: APP/X0360/W/24/3354607; LPA Ref:

233038 (dismissed appeal for up to 148 dwellings on land affected by AWE constraints) (22 September 2025) (CD10.7)

- Land at Heathlands Road, Wokingham RG0 3AR Appeal Ref: APP/X0360/W/25/3359928; LPA Ref: 240831 (appeal dismissed 24 September 2025) (CD10.8)

2.17. A live application, as yet undetermined, proposes a large strategic scale development in close proximity to this Appeal Site (LPA Application Reference 252498, relating to a site known as 'Hall Farm Church Lane Arborfield Reading RG2 9HX'). That site is a proposed site allocation referred to in the Emerging Local Plan (presently undergoing examination) as 'Loddon Valley Strategic Development Location'. A hybrid application, validated 24 October 2025, seeks permission for up to 2,800 residential dwellings, two primary schools (including early years provision, one secondary school, one district centre (with up to 11,000m² of Class E floorspace including a food store of approximately 2,500m² and Class F community/learning use, as well as an additional local centre to include up to 2,400m² of Class E, Class F and sui generis uses (to include commercial, health care and public house) along with 20 gypsy and traveller pitches, land for a cemetery, and associated infrastructure, landscaping, public open space, play areas, and ecological enhancement measures. The hybrid application also includes a full application for the delivering of 40.4ha of Suitable Natural Greenspace (SANG) (and necessary demolition works). As such, should it be approved, this would alter the contextual analysis of this Site. Given the scale of the proposal it is unlikely to materially impact the housing supply position in the short term. Relevant application plans are provided at CD13.1 to 13.11).

2.18. Overall, and for the reasons stated, there are no environmental or statutory designations that would otherwise serve to limit the development potential of the Site.

3. The Appeal Scheme

Introduction

- 3.1. The Application was developed and informed following a thorough review of the opportunities and constraints afforded by the Application Site.
- 3.2. The Appeal Scheme proposes up to 111 dwellings (C3 Use), including up to 44 affordable homes (40%) along with associated landscaping and open space with access from Reading Road.
- 3.3. Only the principle of developing the site for up to 111 dwellings and associated works. (as described above), together with the means of access are to be determined as part of this appeal. Appearance, landscaping, layout, and scale are reserved for subsequent determination.
- 3.4. The proposals are set out on the following plans:

The Scheme

- Site Location Plan No. 052403-DAN-LOC01 (CD1.5)
- Emergency Access Plan No. 147.0017.0009 Rev P01 (CD1.28)
- Refuse Vehicle and Fire Appliance Tracking – Proposed Site Access Drawing No. 147.0017.0006 Rev P02 (CD1.29)
- Proposed Site Access General Arrangement Plan No. 147.0017.0001 Rev P07 (CD1.30)

Illustrative Plans

- Illustrative Masterplan No. 052403-DAN-MP01 (CD1.9)
 - Indicative Land Use Plan No. 052403-DAN-ILUP (CD1.10)
 - Topographical Survey No. 052403-DAN-TOPO1 (CD1.11)
 - Illustrative Parking Plan and Accommodation Schedule (Drawing Ref 052403-DAN-IPP (CD1.13)
- 3.5. The Plans listed under 'The Scheme', above, comprise the plans which are submitted for approval via this Appeal. The other 'Illustrative Plans' are submitted for illustrative purposes only/ background information but could be subject to a condition requiring the reserved matters scheme to be in general conformity with these plans.

Masterplan Approach

- 3.6. Preparation of the Illustrative Masterplan (CD1.9) was informed by a number of technical studies (as summarised in Section 4 of the Planning Statement, CD1.3) alongside consideration of relevant planning policy requirements. The Masterplan approach, including in relation to design, is underpinned by a thorough contextual appraisal of the site and its surroundings. Full details are set out in the Design and Access Statement submitted with the Application (CD1.4).
- 3.7. The Masterplan vision is to create a high-quality and considered development, that responds appropriately to the constraints and opportunities of the Appeal Site and its surrounding context and provides a range of dwelling sizes to meet different occupiers' needs. These will be set within a hierarchy of streets, with green open space and natural surveillance. The houses will be designed to respect and reflect the character of the area, so that the development has a bespoke design which is in keeping with the established local character.
- 3.8. The vision is to be achieved through the following design principles included in the Masterplan design (CD1.9):
- Delivering a scheme which embodies the characteristics of the area.
 - Making optimum use of the land for the delivery of new homes, with development form and density appropriate to the location.
 - Delivering a development with a range of house sizes, types, and tenures in response to local need.
 - Conserving and enhancing the landscape, ecology, and natural resources around the site with green corridors and linkages.
 - Respecting the amenity and setting of neighbouring residential development.
 - Maximising the linkages between the site and surrounding area and provide opportunities for walking and cycling.
 - Developing an inclusive, safe, and secure residential environment.
 - Providing adequate on-site arrangements for vehicular access, servicing, and parking, including the emergency services and statutory authorities.

3.9. The Design & Access Statement (CD1.4) also sets out the following key landscape principles upon which the Masterplan is based:

- Retention of the existing landscape framework of hedgerow and tree lined field boundaries, ensuring the proposals are well integrated into the existing landscape.
- Setting development back from Reading Road to retain and respect the character of the area.
- Proposed building heights to be between two and two-and-a-half storeys, reflecting the surrounding context.
- Creation of recreation opportunities within the Site proposals, including a generous areas of public open space (including equipped play area)
- Provision of street trees throughout the new development, to break up the housing and assist in filtering views.

3.10. The principal elements of the Appeal Scheme are summarised as follows:

- The scheme provides for up to 111 dwellings, to include an appropriate mix of house types, within a landscaped setting.
- The scheme will include a mix of housing tenures, with 40% affordable housing.
- Varied building heights, predominantly 2 storeys, but adjacent forms of development indicate that up to 2.5 storeys is in-keeping with the vernacular of the surrounding area.
- Vehicular and pedestrian access from Reading Road.
- On-site provision of public open space.
- Landscaping, including enhancement at the eastern and western ends of the Appeal Site to retain the character of the area.
- SUDS/drainage features.
- Associated biodiversity enhancements.
- Energy efficiency measures and electric vehicle charging points can be secured by condition.

3.11. The component parts of the scheme as summarised are below.

Layout and Access

- 3.12. Illustrative Masterplan No. 052403-DAN-MP01 (CD1.9) shows one way in which the proposed residential development could be laid out on the Site. The location of the vehicular access point onto Reading Road is the only suitable access point for the Site. The determination of this access point has been informed by a speed survey to inform required visibility splays (appended to CD1.14) topographical (CD.11) and arboricultural surveys (appended to CD1.18).
- 3.13. The principle of a simple bell mouth junction design, developed in line with DMRB standards and with the appropriate forward visibility, is proposed as the means of vehicular access, and main pedestrian access, to the site. This junction can accommodate the predicted development traffic that would be generated by the development. Additional pedestrian links to the existing bus stops on Reading Road are also proposed to ensure safe access for existing and future residents.
- 3.14. The carriageway width of 6m (CD1.30) (updated from 5.5m during the course of the application – the original proposal is at CD1.6) will accommodate vehicular access into the Site with footpath connections proposed to link into the wider footpath network along the western and southern site boundaries. A package of footway improvements/lighting installation will enhance the pedestrian connections from the Site to Arborfield Cross, as detailed in the Proof of Evidence of Mr Matthew Stevens addressing highways and accessibility matters.

Land Uses

- 3.15. The technical assessments that have been undertaken in relation to the Site are intended to support a scale of development for up to 111 dwellings, together with a means of access from Reading Road.
- 3.16. Analysis of the Site's topography (CD1.11), flood risk, drainage (CD1.15), arboricultural (CD1.18) and ecological (CD1.17) requirements has informed the proposed siting of two large areas of open space at the eastern and

western ends of the Site. The siting of the dwellings (for future consideration) will be influenced by the location of existing development (outside of the Site boundaries), position of existing trees and their associated Root Protection Areas (RPAs), as well as general good design principles.

- 3.17. The Illustrative Masterplan (CD1.9) accommodates a range of dwelling types and sizes, laid out in distinctive groupings to create visual interest and a sense of place, with detached dwellings addressing the site entrance and providing natural surveillance over the areas of public open space, with higher density runs of terraced dwellings contained within the centre of the development. The layout as drafted would create movement and variety within the future development. Consideration has been given to accommodating the requisite parking provision and garden amenity areas, as well as landscaped boundaries, public space, and children's play area.

Table 1: Proposed Land Uses (as per Indicative Land Use Plan 052403-DAN-ILUP – CD1.10)

Land use	Ha	Approx Dwellings	No.
Residential (C3 use) and associated infrastructure (roads/SuDS/Attenuation)	Approx 3.93ha	Up to dwellings	111
Open Space and Green Infrastructure <i>Includes local open space, amenity areas, semi-natural greenspace and landscape buffers, ecology enhancements</i>	Approx. 2.51ha	N/A	
Total	6.4ha	Up to 111	

Housing Mix and Affordable Housing

- 3.18. The Scheme proposes 40% affordable housing (which equates to 44 dwellings based on a 111-dwelling scheme).
- 3.19. The remaining (up to) 67 market dwellings will comprise a range of 1 – 4 bedroom houses, with the precise mix to be agreed at the reserved matters stage.

- 3.20. The development will allow for a mix of housing sizes, types, and tenures, to meet the local needs identified in the most recent evidence base. This could include a mixture of family housing and smaller starter homes.
- 3.21. The affordable housing provision meets the current policy requirement of 40% on greenfield sites of 5+ dwellings as set out in Core Strategy Policy CP5 and seeks to address the acute affordable housing need within the Borough. In accordance with the approach set out in Managing Development Delivery Local Plan Policy TB05 and the Council's Affordable Housing Supplementary Planning Document, the affordable housing component of the scheme (44 dwellings; 40%) is expected to comprise the following mix, which can be agreed and secured through the s106 agreement:
- 8 x 1-bed dwellings
 - 21 x 2-bed dwellings
 - 9 x 3-bed dwellings
 - 6 x 4-bed dwellings

Density

- 3.22. With a site area of 6.4ha the gross density is 17.3dph. The net density of the developable area, however, is 28dph (up to 111 dwellings on 3.93ha) set within an additional 2.5ha of landscaped green/open space. This density will ensure the new dwellings integrate with, and complement the local area in terms of scale, massing and layout, whilst sympathetically responding to the Site's edge of settlement location (and the lower densities along Church Lane, Arborfield) whilst making efficient use of this sustainably located land parcel.

Landscaping Strategy

- 3.23. Although landscaping is a reserved matter, the Illustrative Masterplan (CD1.9) submitted with the Application provides an overview of the landscape principles to be applied at reserved matters stage. These are also set out in section 6 of the Landscape and Visual Appraisal which accompanied the application (C1.16). These principles include:

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- Retention of the existing landscape framework/structure, particularly around the site boundary. Internal vegetation retained where feasible;
 - Supplemental vegetation planted around the site boundary to create a strong feature; to be native and 50% evergreen;
 - Additional landscape buffer to the north boundary which is presently unvegetated;
 - Space for tree planting within residential parcels;
 - New sustainable footpath connections;
 - Dwellings offset from Reading Road and Church Lane to minimise visibility of built form and retain wooded character;
 - Maximum 2.5 storey building height to tie into surrounding built form;
 - Public open space delivered to east of site to create a softer transition to the countryside.
 - Incorporation of SuDs features.

3.24. It is envisaged that the public spaces will be managed and maintained through the establishment of a Management Company, whilst the residential landscaping will be the responsibility of each plot owner.

4. Decision Making Framework - The Development Plan and Other Material Considerations

General

- 4.1. This section of my Proof of Evidence identifies relevant Development Plan policies, noting that section 38(6) Planning and Compulsory Purchase Act 2004 creates a statutory requirement that applications be determined in accordance with the Development Plan unless other material considerations indicate otherwise. In doing so I have focused upon the particular policies identified in the reasons for refusal and the main issues arising in this appeal. In accordance with *R v Rochdale Metropolitan Borough Council ex parte Milne* [2000] EWHC 650 (CD9.1), the relevant question is whether the proposal accords with the Development Plan as a whole rather than whether it accords with each and every policy contained therein. This has more recently been confirmed in *Corbett v Cornwall County Council* [2020] EWCA Civ 508 (CD9.2).
- 4.2. After considering compliance with the Development Plan this section of my proof then goes on to identify and outline other relevant material considerations.

THE DEVELOPMENT PLAN

Overview

- 4.3. The relevant parts of the adopted Development Plan comprise:
- Saved Policy NRM6 of the South East Plan.
 - The Core Strategy (“CS”) (CD6.1) - adopted in 2010, prior to the first introduction of the NPPF in 2012. The CS sets out the spatial strategy for development management in the period up to 2026.
 - The Managing Development Delivery Local Plan (“MDD”) (CD6.2) - adopted 2014. The MDD sets out detailed policies for delivery of the CS’s 2010 spatial strategy.

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- The Arborfield and Barkham Neighbourhood Plan (made April 2020) (CD6.3) which is based upon the 2010 CS and does not assess or seek to deliver housing other than in accordance with the CS 2010.

4.4. The Development Plan policies applicable to the determination of the Appeal are listed below, with those which are referenced in the decision notice underlined, and those which are considered 'most important' (for the purposes of paragraph 11(d)) highlighted in bold. Those marked with an asterisk are the policies which are not fully met.

Saved Policies of the South East Plan

- NRM6 – Thames Basin Heaths Special Protection Area

Core Strategy

- CP1 – Sustainable Development*
- CP2 – Inclusive Communities
- CP3 – General Principles for Development
- CP4 – Infrastructure Requirements
- CP5 – Housing Mix, Density and Affordability
- CP6 – Managing Travel Demand
- CP7 – Biodiversity
- CP8 – Thames Basin Heaths Special Protection Area
- **CP9 – Scale and Location of Development Proposals***
- **CP11 – Proposals Outside Development Limits***
- **CP17 – Housing Delivery**

Managing Development Delivery DPD

- CC01 – Presumption in Favour of Sustainable Development
- **CC02 – Development Limits***
- CC03 – Green Infrastructure, Trees, and Landscaping*
- CC04 – Sustainable Design and Construction
- CC05 – Renewable Energy and Decentralised Energy Networks

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- CC06 – Noise
 - CC07 – Parking
 - CC09 – Development and Flood Risk
 - CC10 – Sustainable Drainage
 - TB05 – Housing Mix
 - TB07 – Internal Space Standards
 - TB08 – Open Space, Sport, and Recreational Facilities Standards
 - TB12 – Employment Skills Plan
 - TB21 – Landscape Character*
 - TB23 – Biodiversity and Development
 - TB24 – Designated Heritage Assets
 - TB25 – Archaeology

Arborfield and Barkham Neighbourhood Plan

- IRS1 – Preservation of Separation of Settlements.
- IRS2 – Recognise, Respect and Preserve Identity and Rural Setting of Settlements.*
- **AD1 – New Development within Development Limits.***
- AD3 – High Quality Development with Generous Open Space, Properly Landscaped
- AD4 – Address Local Flood Risk Management

Development Plan Compliance

- 4.5. As identified above, it is accepted that the Appeal Scheme conflicts with the settlement boundaries established under policies CP9 and CP11 of the Core Strategy (“CS”), CC02 of the Managing Development Delivery Local Plan (“MDD”) and AD1 of the Arborfield and Barkham Neighbourhood Plan (“NHP”). There is also a conflict with Policy CP1 due to the use of a small parcel of BMV agricultural land, and CC03, IRS2 and TB21 due to the localised change in landscape and change to the setting of the nearby settlement. Otherwise, the relevant Development Plan requirements are met.
- 4.6. Accordingly, it cannot be said that the scheme complies with the Development

Plan 'as a whole' for the purposes of s38(6) PCPA 2004. However, and as detailed below, there are a number of material considerations which indicate that permission should be granted despite this conflict.

- 4.7. In summary, the weight attached to the conflict with the Development Plan is limited because the Development Plan is out of date, as it frustrates the delivery of identified housing needs and therefore, the spatial strategy (and associated settlement boundaries) are inconsistent with the NPPF's objective to significantly boost housing supply. Furthermore, the Council is unable to demonstrate a five year supply of deliverable housing land contrary to the requirements of the NPPF. For both of these reasons, the Development Plan is considered out of date, and the tilted balance of paragraph 11(d) NPPF (which is a material consideration). In so far as there are no strong reasons for refusal at paragraph 11(d)(i) of the NPPF, the Appeal falls to be positively assessed under paragraph 11(d)(ii).

OTHER MATERIAL CONSIDERATIONS

- 4.8. In accordance with s38(6) PCPA, other material considerations may justify a positive decision despite a conflict with the Development Plan. The most important material considerations in this case are the NPPF (in particular its objective to significantly boost housing), the Housing Land Supply Position statement (with the Council accepting that it cannot demonstrate the necessary five years' supply of deliverable housing sites and the acceptance, by the Council (via its Proposed Submission Local Plan) that it is unable to meet identified housing needs without breaching established settlement boundaries; furthermore the Council proposes to deliver a significant portion of the necessary growth in a location in close proximity to this appeal Site, further boosting the sustainability credentials of this Site. In summary, the material considerations relevant to the determination of this Appeal are as follows.

- NPPF and associated PPG;
- Identified Housing Needs and 5 Year Housing Land Supply Position;
- Affordable Housing Needs;

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- Absence of adopted policy to meet identified housing needs;
 - Acceptance, by the Council, of the need to breach settlement boundaries in order to meet identified housing requirements (as set out in the proposed Submission Local Plan Update);
 - The Council's proposal to deliver significant growth in close proximity to the Appeal Site, further improving its sustainability credentials;
 - Wokingham Borough Council Local Plan Update and Evidence Base Studies.
 - Recent LPA and appeal decisions relating to development proposals in Wokingham Borough Council's administrative area:
 - Application No.250735 Land to the North of School Road, Arborfield Cross.
 - Application No. 232490 Land off Langley Common Road, Arborfield, Wokingham.
 - Application No. 232490 Land off Langley Common Road, Arborfield, Wokingham.
 - Appeal Decision APP/X0360/W/24/3340006 - Land west of Trowes Lane and north of Charlton Lane, Swallowfield RG7 1RT (allowed, 19 July 2024)
 - Appeal Decision APP/A1910/W/23/3333545 (Rectory Farm, Kings Langley, Hertfordshire, Dacorum, WD4 8HG) (allowed, 9 May 2024)
 - Appeal Decision APP/X0360/W/24/3354667 (Land adjacent to Blagrove Lane, Wokingham RG41 4AX) (allowed, 29 May 2025)
 - Appeal Decision APP/X0360/W/24/3354607 (Land East of Hayes Dr and North of Church Lane, Three Mile Cross, Reading Berkshire) (dismissed, 22 September 2025)

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- Appeal Decision APP/X0360/W/25/3364304 (Land between Lodge Road and Tape Lane, Hurst RG10 0EG) (dismissed, 9 October 2025)
 - Application Ref 250733 (Land at Ducks Nest Eversley Road Arborfield)
 - Recent live application for strategic scale development in close proximity to appeal Site: LPA Application Reference 252498 (CD13.1-CD13.12)
 - Appeal decision relating to mitigation of impacts on SPAs: APP/A1910/W/23/3333545 - Rectory Farm, Kings Langley, Hertfordshire, Dacorum, WD4 8HG (decided May 2024)
 - Borough Design Guide SPD and other SPD documents including the Arborfield Village Design Statement.

Absence of Adopted Policy for Development to Meet Identified Housing Requirements

- 4.9. The CS (2010) (CD6.1) made provision for at least 13,230 dwellings in the period 2006 to 2026 as set out in Policy CP17. Notably, this level of delivery was based on the historic South-East Plan targets and a backlog arising from the older Structure Plan which persisted at the point of adoption (as per para 4.77 CS). The development limits and settlement boundaries in the Development Plan flow from that spatial strategy and the assessment of housing need at that time.
- 4.10. Accordingly, the Development Plan is out of date in relation to housing requirements, in terms of the level provision planned for in CS Policy CP17. The CS, MDD and ABNHP do not seek to identify or meet in full the objectively assessed needs for market housing using a NPPF compliant assessment (derived via the standard method). Nor do they identify or meet objectively assessed needs for affordable housing.

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- 4.11. . The content of the spatial strategy pre-dates the first publication of the NPPF in 2012. Accordingly, that collection of policies is in conflict with the NPPF requirement (paragraph 61) to significantly boost the supply of housing.
- 4.12. On that basis, Policy CP17 is out of date, and so too are the associated settlement boundaries and 'Development Limits' set out the Development Plan documents which deliver on the CS vision (CP9, CP11 of the CS, CC02 of the MDD and AD1 of the NHP).
- 4.13. There is an inability to meet identified needs within existing settlement limits. As such, only **limited** weight can be given to the conflict between the Appeal Scheme and the settlement boundaries defined by Policies CP9, CP11, CC02 and AD1. In all other respects, the Application Scheme is considered to be compliant with the development management policies within the suite of Development Plan documents, other than the minor loss of good quality agricultural land (0.7ha) which attracts **very limited** weight, and the change in landscape character which attracts **moderate** weight..
- 4.14. Furthermore, whilst the Council accepts they are unable to demonstrate an adequate supply of deliverable housing land, and that there remains an acute need for affordable housing, the Appellants position is that the extent of the shortfall is greater than that accepted by WBC. Their latest position statement (August 2025) concluded that there is a deliverable housing land supply of only 2.5 years during the period April 2025 to March 2030. The Appellant's position is that it is a maximum of 2.3 years. The basis for this is detailed in the separate Housing Land Supply and Affordable Housing Need Proof of Evidence.
- 4.15. The Neighbourhood Plan was made more than five years ago so does not alter the tilted balance in terms of the operation of paragraph 14 NPPF.
- 4.16. On that basis, the weight to be attached to the conflict with Policies CP9 and CP11 of the CS, CC02 of the MDD and AD1 of the NHP, (which relate to the Site's location beyond defined settlement limits at Arborfield Cross) is reduced due to the operation of paragraph 11(d) NPPF.

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- 4.17. As identified in the evidence base for the Local Plan Update, the Council cannot meet its identified development needs by adhering to and applying the settlement boundaries as defined in the current Core Strategy and Site Managing Development Delivery DPD.
- 4.18. This is demonstrably the case given the review of settlement limits undertaken through the emerging Local Plan Update process, and the proposal (in the Submission Plan presently undergoing Examination) to allocate significant areas of additional land beyond current settlement boundaries for new housing. It is clear that the current boundaries (defining the settlements) cannot be maintained in their current position if the identified housing need is to be met. This is a material consideration that weighs against the conflict arising from the Site's location outside of these out-of-date settlement boundaries defined under Policies CP9, CP11 CC02 and AD1 of the Development Plan.
- 4.19. The emerging Local Plan Update was submitted to the Secretary of State for examination in February 2025 (CD6.13) and Stage 1 Hearings commenced in November 2025. The Local Plan is not expected to be adopted until late 2026 at the earliest. Presently the Submission Plan relies upon early delivery of homes from the large Loddon Valley Strategic Development Location in 2027. A hybrid planning application for development of that proposed allocation has now been validated in late October 2025. CD13.1 to 13.13 are a selection of parameter and illustrative plans from that application package.
- 4.20. In April 2025 the Examination Inspector wrote to the Council (Examination Document ID1 – CD6.14) noting “particular concerns about the delivery of housing”, and sought further information on the timescales for progressing this Loddon Valley Garden Village SDL allocation, given the need for critical/essential infrastructure to the cost of some £10 million and the indicative costs in the viability study of highway works (£140million), community facilities (£5.3 million), sub-station capacity upgrades (£16.8 million), sports facilities (£15.2 million), and open space (£10.6 million). The Council issued its response (Examination Document WBC6 – CD6.15) on 28 May 2025. This confirmed that the first completions at this SDL included in the housing trajectory are anticipated in 2027/28. In order to achieve this, certain milestones were set

out, including submission of outline planning applications by University of Reading and Gleeson land, relating to the Loddon Valley SDL, in Q3 2025 (this having been achieved, with the application validated on 24 October 2025), along with a hybrid application relating to the part of that SDL site referred to as Hatch Farm (in the north of the SDL). To date (14 November 2025) the latter is not registered on the Council's portal as a valid application. This hybrid application would need to be determined by Q3 2026, with conditions on the Hatch Farm site discharged by Q1 2027 before construction up to completion in that 2027/2028 period. As there is no full application submitted as yet for the delivery of housing on the site, these timescales appear unrealistic.

- 4.21. It is clear that the delivery assumptions remain to be tested as part of the Examination in Public process and following review of the application proposals by statutory consultees and the public. It remains to be seen whether all proposed allocations are deliverable in the time envisaged, whether the housing trajectory is achievable and ultimately, whether the Local Plan Update will be found to be a sound strategy to meet identified needs.
- 4.22. In the meantime, for the purposes of decision-taking, and this Appeal in particular, the lack of an up-to-date plan means the presumption in favour of sustainable development (paragraph 11(d) NPPF) is engaged. The policies which are most important for determining the application are out-of-date due to their inconsistency with the NPPF's objective of significantly boosting the supply of housing. Even if that application were determined in the short term, allowing development to come forward on the Hall Farm/Loddon Valley SDL site as proposed, this would fundamentally change the context of this appeal Site and introduce new homes, primary and secondary schools, play spaces and local shops and employment in very close proximity / walking distance to the appeal Site.
- 4.23. As the tilted balance of paragraph 11d is engaged, planning permission should be granted unless there is a "strong reason for refusal" on footnote 7 grounds (which does not arise here)), or "any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making

effective use of land, securing well-designed places and providing affordable homes, individually or in combination”.

- 4.24. As outlined throughout this Proof of Evidence the Scheme delivers a number of significant benefits that clearly outweigh the conflict with the spatial strategy and the other identified harms, including harm to the landscape character and loss of a very small area of good quality agricultural land. The proposal accords with relevant development management policies.
- 4.25. The Minister of State for Housing and Planning recently determined an appeal relating to land at Three Mile Cross (CD10.7). The effect of that decision (which dismissed an appeal for up to 148 homes on land in proximity to the AWE facility) re-emphasises the constrained nature of the borough, and that land will not come forward for residential development in affected areas. At paragraph 39 of his decision, the Minister took the view that the contribution to housing land supply and affordable housing, in that case, **each** carried **very substantial** weight. The Inspector’s decision, at 15.74, notes that recent changes to housing targets caused “a 78% overnight increase in housing need.” She acknowledged the practical difficulty in addressing this, but was clear that “it [the difficulty] does not diminish the actual need.” She also noted that there had been a surplus of housing completions and a strong record over performance over the Core Strategy period since 2006, but was clear that “Nevertheless, the requirement is essentially forward facing and the bottom line is that the housing land supply position is very weak.” (para 15.75 of inspector’s decision). Gong on to consider the prospect of the emerging plan addressing that need:

“ 15.76 The already delayed eLP fails to provide for 15 years of needs upon adoption, hence it is likely to need to add at least 2 years’ further requirements. It provides for less than 80% of the local housing need. There are no guarantees that the plan will be found sound in its present form as it is untested. Even if the eLP is adopted in the next couple of years, the Council will have to immediately commence a replacement local plan. Furthermore, there are many objections to the eLP. Under these circumstances I give very significant weight to the addition of 148 homes to the supply of housing.”

4.26. In the recent appeal decision APP/X0360W/25/3364304 (Land between Lodge Road and Tape Lane, Hurst) (decided 9 October 2025) (CD10.6), the Inspector considered the housing land supply shortfall (at 2.5 years' supply) to be a "significant shortfall" and in that case, he gave the proposals' conflict with the spatial strategy only moderate weight.

4.27. In the 2024 Appeal Decision APP/X0360/W/24/3340006 (Land west of Trowes Lane and north of Charlton Lane, Swallowfield RG7 1RT), (CD10.3) 81 dwellings were allowed. As per the inspector at paragraph 53 of the decision:

"I have found that the appeal proposal would conflict with the spatial strategy of the development plan as the site lies outside the settlement limits of Swallowfield and does not constitute development appropriate in a countryside location. Given the lack of housing land supply, application of that strategy needs to be applied in a flexible way to ensure that sufficient land for housing continues to come forward. However, even if the settlement limits around Swallowfield are applied flexibly to allow development on the edge of it, the scale of the proposed development is such as to conflict with the strategy for development in settlements of the size of Swallowfield. I give that conflict moderate weight."

4.28. Since that time, the housing supply position has significantly worsened. As such, the conflict with these policies is now rightly afforded only **limited** weight in the planning balance.

National Planning Policy Framework

4.29. The National Planning Policy Framework (NPPF) was most recently updated in December 2024. It is a material consideration of particular standing in the determination of planning applications.

4.30. The content of the NPPF as it relates to the proposed development of the application site is addressed in the order set below:

- The presumption in favour of sustainable development
- Decision making taking
- Delivering a sufficient supply of homes
- Promoting sustainable transport

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- Achieving well-designed places
 - Meeting the challenge of climate change, flooding, and coastal change
 - Conserving and enhancing the natural environment.

4.31. Paragraph 8 of the NPPF identifies that there are three dimensions to sustainable development, comprising (i) economic, (ii) social; and (iii) environmental.

Economic Role

4.32. The economic role requires the planning system to, inter alia, ensure that sufficient land of the right type is available in the right places and at the right time to support growth. This is achieved with the Appeal Scheme on the basis that it is located within a sustainable location, within walking and cycle distance of local services and facilities. The scheme also provides for housing development of the type and mix required to meet identified needs.

4.33. The scheme further addresses the economic role in terms of increased LPA Revenues, Construction impacts (increased GVA, jobs etc.) and increased expenditure in local area.

Social Role

4.34. The social role requires the planning system to provide the supply of housing required, creating a high-quality built environment, accessible to local services and reflecting the community's needs. All of these requirements can be achieved with the Appeal Scheme.

Environmental Role

4.35. The environmental role requires the planning system to protect and enhance the natural, built, and historic environment. This can be achieved with the proposal in a location that will not result in any significant adverse effects upon the character of the surrounding area, including in landscape terms and lead to enhancements to both the natural and historic environment.

Decision Taking

- 4.36. Section 4 of the NPPF sets out the approach to decision-taking. Paragraph 39 makes it clear that decision-makers at every level should seek to approve applications for sustainable development where possible.
- 4.37. The Appeal Site is located in a sustainable location and will improve the economic and social conditions of the area. It will also help to provide recreational open space and new biodiversity habitats.
- 4.38. Paragraph 49 refers to the weight to be given to relevant policies in emerging plans according to the stage of preparation and the extent to which there are unresolved objections. In the context of Wokingham Borough, the emerging Local Plan has been submitted for examination, but the examination hearings have not yet begun; as such, it is afforded limited weight.

Delivering a Sufficient Supply of Homes

- 4.39. Paragraph 61 sets out the Government's objective of significantly boosting the supply of homes.
- 4.40. Paragraph 62 sets out the approach to determining the minimum number of homes needed, which should be informed by a local housing need assessment conducted using the standard method in national planning guidance as a starting point, with alternative approaches only being justified in exceptional circumstances. It also adds that any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.
- 4.41. Paragraph 72 sets out the need to provide a five-year supply of deliverable sites for housing. It also requires sites or broad locations for growth for years 6-10 and beyond.

- 4.42. The Appeal Scheme proposes for up to 111 dwellings which would make a material contribution towards the substantial shortfall in supply. In the circumstances of this case, it represents a material consideration of substantial weight in support of the Appeal Scheme.
- 4.43. The Appellant's will work with the Council in seeking to agree Housing Land Supply Statement of Common Ground, based upon the most up to date information.

Promoting Sustainable Transport

- 4.44. Section 9 sets out the approach to providing for sustainable growth.
- 4.45. Paragraph 110 states the following:

"The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making."

- 4.46. The Appeal Site is located in a sustainable location adjacent to a smaller settlement but with walkable access to the services and facilities of Arborfield Cross, and with regular bus service to larger settlements (Reading and Wokingham). The feedback from the Highway Authority demonstrates the acceptability of the Appeal Scheme in sustainability terms. Accordingly, the Scheme is consistent with section 9 and paragraph 110 of the NPPF.

Achieving Well-Designed Places

- 4.47. Section 12 sets out the approach to achieving well-designed places.
- 4.48. Paragraph 131 states that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. It is added that good design is a key

aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.

- 4.49. Paragraph 136 adds that trees make an important contribution to the character and quality of urban environments, with planning policies and decisions to ensure opportunities are taken to incorporate trees within developments. The outline scheme incorporates a number of trees.
- 4.50. The Design and Access Statement and Landscape Appraisal submitted with the Application detail the overall design response. Further detail can be secured at the reserved matters stage.

Meeting the Challenge of Climate Change, Flooding and Coastal Change

- 4.51. Section 14 sets out the approach to supporting the move towards a low carbon future as well as the approach to the management of development and flood risk.
- 4.52. These requirements were addressed in the Energy and Sustainability Statement and the Flood Risk Assessment and Drainage Strategy submitted with the Application.

Natural Environment

- 4.53. Section 15 sets out the approach to conserving and enhancing the natural environment.
- 4.54. Paragraph 187 states that planning policies and decision should contribute to and enhance the natural and local environment including by inter alia, protecting and enhancing valued landscapes in a manner commensurate with their statutory status of identified quality in the development plan.
- 4.55. Paragraph 193 sets out the approach to avoiding significant harm to biodiversity when determining planning applications.

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- 4.56. The Appeal Site is not a valued landscape, and the Scheme delivers a net gain in biodiversity.

Historic Environment

- 4.57. Section 16 sets out the approach to conserving and enhancing the historic environment. The Council's Built Heritage team confirmed in their response that there are no built heritage assets within the Site and in terms of those beyond the Site itself, they are of sufficient distance (coupled with the intervening trees and buildings) that there would be no detrimental impact to the setting of these.

Identified Local Housing Need and 5 Year Housing Land Supply Position

- 4.58. A separate Proof of Evidence is submitted on behalf of the appellant, detailing the Housing Land Supply shortfall and Affordable Housing Needs. In summary, the Council accepts that it cannot demonstrate the necessary five-year supply of housing land; the Council has prepared an updated land supply assessment, for the period April 2025 to March 2030, showing only 2.5 years' supply of deliverable housing sites (compared to the 1.7 years available between April 2024 and March 2029).
- 4.59. The Appellant's position is that the extent of shortfall is in fact greater than this, sitting at a maximum of 2.3 years' supply. The difference relates to the deliverability of three sites in particular as detailed in Mr Ritchie's proof of evidence. Table 1, below, shows a comparison of the housing land supply position between the Council and the Appellant.

Table 1: Housing Land Supply Position - Comparison		
Step	LPA	Appellant
A - Annual requirement (1/4/25 – 31/3/30)	1,317	1,317
B - Base year Requirement: (1/4/25 – 31/3/30) (A x 5)	6,585	6,585
C - Add 5% buffer pursuant to HDT (B x 5%)	329	329
D – Final five year requirement (1/4/25-31/3/30) (B + C)	6,914	6,914
E - Annual requirement (1/4/25 – 31/3/30) (F/5)	1,382.8	1,382.8
F – Deliverable supply (1/4/25 – 31/3/30)	3,453	3,181
G - No. Years Supply (F/E)	2.50	2.30
H - Extent of Surplus / Shortfall compared to 5 year requirement (F – D)	-3,461	-3,733

4.60. The Joint Arborfield and Barkham Neighbourhood Plan was made of 22nd April 2020. Since the fifth anniversary of its adoption occurred on 22nd April 2025, this means paragraph 14 of the NPPF does not apply, (and it is further noted that that plan contains no site allocations).

4.61. As confirmed in case law (see *Hallam Land Management Ltd v Secretary of State* [2018] EWCA Civ 1808), the extent of the shortfall is relevant to the weight that can be given to out-of-date policies, as well as to the benefits of housing delivery. In addition, Paragraph 232 of the NPPF requires that the weight to be given to policies according to their degree of consistency with the Framework – with more weight given to policies which are consistent with the NPPF's objectives and goals. Accordingly, the extent of the shortfall is substantially material to assessing the merits of housing delivery from the Appeal Scheme.

4.62. The Council's inability to demonstrate five-year supply of housing land supply engages the presumption in favour of sustainable development pursuant to NPPF paragraph 11d.

- 4.63. Given the Appeal Site is predominantly greenfield land, the ability to deliver quickly and thus contribute towards the 5-year housing land supply shortfall is considered to represent a substantial benefit of the proposal.
- 4.64. The delivery of market housing from the Appeal Scheme, in a sustainable location is a material consideration of **substantial weight** in favour of the grant of planning permission.

Affordable Housing Needs

- 4.65. The Appeal Scheme proposes the on-site provision of up to 44 affordable dwellings, which amounts 40% of the total number of dwellings to be provided, which is compliant with Development Plan Policy CP5.
- 4.66. A separate Proof of Evidence addresses affordable housing needs in Wokingham, and Arborfield specifically as well as relevant guidance and policy on supply of affordable housing. In summary, it concludes that there is a significant need for affordable housing which continues to grow and which has not been addressed by the level of affordable housing provision in the Borough. Insufficient new affordable homes have been completed in the Borough to offset the increased demand for such properties which has resulted in the size of the housing register remaining broadly constant. The housing register shows there is as very significantly **greater demand** for affordable homes in Arborfield & Newland Parish compared to the Borough as a whole.
- 4.67. The NPPF is a material planning consideration. It is important in setting out the role of affordable housing in the planning and decision-making process.
- 4.68. The NPPF sets a strong emphasis on the delivery of sustainable development, including affordable homes, at paragraphs 20 and 63.
- 4.69. Paragraph 61 clearly sets out the Government's aim to "boost significantly the supply of homes" while throughout the NPPF the importance of affordable housing is highlighted (paragraphs 11dii, 63, 64, 65, 66, 67, 71, 76, 82, 154f, 156 and 157).

4.70. The need for affordable housing and importance is emphasised in many Government publications, including:

- Building the Homes We Need ministerial statement by the Deputy Prime Minister on 30th July 2024.
- Written Ministerial Statement made by the Minister of State for Housing and Planning on 12 December 2024 (Publication of new NPPF).
- Statements by the Chancellor associated with the publication of the National Infrastructure Strategy (19th June 2025)

4.71. The provision of 44 affordable homes on the Appeal site³ in the right location for affordable needs is a **benefit of substantial weight**, especially as it is over 10.8%⁴ of the Borough's annual affordable need. The Appeal Site benefits from good accessibility with frequent bus service which provides scope for the occupants of the affordable housing which will come forward on this Site to access job opportunities in Reading, Wokingham, the Science Park and at Arborfield Green.

4.72. Based on the evidence provided, there can be no doubt that there is an acute need for affordable housing in Wokingham Borough. The evidence set out above emphasises that the provision of affordable housing should be afforded **substantial weight** in the overall planning balance. This proposal includes a level of affordable housing provision at 40%, consistent with that required by policy. This is a significant benefit of the appeal scheme given the ongoing unresolved affordable housing needs as indicated by the Council's housing register. The most recent information on this shows 1,204 households on the register, which is 1.7% of the Borough's households as confirmed in the 2021 Census.

4.73. The delivery of 44 affordable homes in a sustainable location where there is significant demand is a material consideration of **substantial weight** in favour of the grant of planning permission.

³ Equates to 39.6%

⁴ 44 of 407

Wokingham Borough Council Local Plan Update

- 4.74. The Council has submitted a Local Plan Update for examination (CD6.13). As noted at the very start of the Submission Plan (paragraph 1.8), Wokingham is a highly constrained borough:

“The challenge of meeting development needs is greater in Wokingham Borough than many other areas. This is due to the comparatively limited availability of previous developed land that can be reused to meet future needs and the presence of constraints such as the Green Belt, flooding and the emergency planning zone around AWE Burghfield, all of which act to limit the supply of potentially suitable land and choices.”

- 4.75. Furthermore, the population grew by 15% between 2011 and 2021 (Submission Plan para 2.4) which is said to be the third highest rate of population increase in the South-East and the one of the highest in England. It is clear that the context has changed significantly from the situation existing when the Core Strategy was adopted in 2010. Paragraph 2.34 therefore, unsurprisingly, identifies that provision of a sufficient supply of land for new homes is a key challenge (and opportunity) of the Local Plan Update.
- 4.76. The proposed new spatial strategy involves the allocation of greenfield land for development, including new SDLs at Loddon Valley Garden Village, South Wokingham and Arborfield Green. The first of these is adjacent to the historic core of Arborfield (to the north of Church Lane) and therefore in close proximity to the Appeal Site. At paragraph 4.49 of the Submission Plan (CD6.13) it is noted that that SDL site has capacity for around 3,930 homes, of which 2,700 would be built in the period up to 2040. If adopted, this will cause significant change to the character of the immediate locality including the historic core of Arborfield. Policy SS10 (Meeting our housing needs) makes provision for 12,763 dwellings in the period April 2023 – 31 March 2040, at a rate of 751 dwellings per annum. The plan is being examined under the transitional provisions of the December 2024 NPPF, and hence the proposed rate of delivery is below the current standard method requirement. As such there is likely to be a need for an immediate review immediately upon adoption (NPPF paragraph 236).

4.77. As identified above, the Inspector has raised (Examination Document ID1) (CD6.14) queries about the assumptions underpinning the housing trajectory and around the infrastructure delivery costs of the proposed allocations and the extent to which these have been taken into account in assumptions around delivery timescales. The Council has responded in its statement (Examination Document WBC6 – CD6.15) setting out key milestones to be achieved in order to achieve the assumed rates of delivery. 25 completions are required on Hatch Farm (part of the Loddon Valley SDL) by 2027, and it is assumed that permission will be in place by the end of 2026, with all conditions discharged by Q1 2027. Whilst the first application has just been validated at the end of October 2025, there is not yet a full application submitted for any housing provision on the Site (rather, only in outline, with the SANG and infrastructure such as roads submitted in full).

4.78. In the recent Blagrove Lane appeal decision (CD10.4) (dated 29 May 2025) the inspector commented (at paragraphs 18 and 19) on the likely timeframes for adoption of the Local Plan Update:

“The Council anticipates the hearing sessions will be complete by the end of 2025 and the emerging plan to be adopted around May 2026, and at this point, the borough’s housing land supply position will be above the minimum five years.

However, the EiP is at an early stage, and hearing sessions are yet to take place, and there is no indication of the Examining Inspectors view on the emerging plan.”...

“It is a matter for the Examining Inspectors to determine whether the emerging plan is sound or not. Nevertheless, it is not certain that the Council’s expectations on timescales will occur, and at best the emerging plan will not be adopted until this time next year. Thus, the current housing land supply position will not change overnight, and it may be that the emerging plan will look to allocate more housing sites in the countryside, and that may well be necessary.

20. For the time being, I consider CS Policies CP9, CP11, CP17 and MDD Policy CC02 frustrate the delivery of housing at the level that is required. They are therefore inconsistent with the Framework’s objective to meet an area’s identified need. However, that does not mean that those out-of-date policies (not only deemed out of date) carry no or little weight. In my opinion, given the purposes of the policies, they carry moderate weight, and moderate

material harm would arise from the proposal's conflict with the spatial strategy."

- 4.79. The appellant agrees that these policies frustrate delivery of housing at the level that is required, and they are therefore inconsistent with the NPPF. In this case the Appellant considers that **limited weight** should be afforded to the conflict with these policies, as opposed to moderate. This is because the Appeal Site is adjacent to the settlement of Arborfield itself (the historic core of Arborfield) and benefits from a regular bus service to Wokingham and Reading. As such, the countryside location is not fully reflective of the Site's sustainable access credentials.

5. The Appellant's Position on the Main Issues for Determination in this Appeal

Main Issues for Determination

- 5.1. The main issues for determination in this appeal are considered to be:
- Identified housing needs (market and affordable) which remain unmet;
 - The principle of development outside defined settlement limits;
 - The quantum and scale of development;
 - Impact on landscape and character;
 - Sustainability of the location;
 - Loss of agricultural land;
 - Flood risk assessment and impact on the main river watercourse;
 - Mitigation of impacts on the Thames Basin Heaths SPA; and
 - Securing planning obligations via a suitable s106 agreement.

Issue 1: Identified housing needs (market and affordable) which remain unmet

- 5.2. As set out in the proof of Evidence of Mr Graham Ritchie, the Council accept they are unable to demonstrate a five-year supply of deliverable housing sites, contrary to the requirement set out in paragraph 78 NPPF. By the Council's calculation they have only 2.5 years' supply. By Mr Ritchie's calculations, this is in fact only 2.3 years' supply, based on some of the sources of supply being undeliverable pursuant to the relevant NPPF definitions. In either case, there is clearly a critical need for more housing in Wokingham. The shortfall, in the immediate 2025 – 2030 period, is 3,733 homes (or 3,461 according to the Council's calculation). The current spatial strategy (Core Strategy) dates to 2010 and planned for delivery of 13,230 dwellings in the period 2006 to 2026 (as per Policy CP17). Accordingly, it predates the first introduction of the NPPF in 2012, and the subsequent revocation of the South-East Plan. Notably, this level of delivery was based on the historic South-East Plan targets and a backlog which had arisen from the older Structure Plan which persisted at the point of adoption (as per para 4.77 CS). It is patently clear that the Core Strategy is out of date, fails to grapple with housing needs as they currently exist, and fails to deliver an NPPF compliant strategy for meeting those needs.

- 5.3. The development limits and settlement boundaries in the Development Plan

flow from that dated spatial strategy and the assessment of housing need as it existed at that point in the past. The Development Plan neither identifies nor addresses objectively assessed housing needs for market or affordable housing. It fails to deliver on the NPPF's objective to significantly boost the supply of housing. The Council accepts that in order to meet objectively assessed housing needs, it will be necessary to breach those historic settlement limits. Its Submission Local Plan Update proposes delivery of new housing development beyond those settlements on greenfield sites. One such location proposed for accommodating growth is the expansive area of land to the north of Arborfield, in close proximity to the Site.

- 5.4. Having established that greenfield development is necessary in order to meet housing needs, it must be restated that this Appeal Site represents a very good option for delivering growth; it is sustainably located, and the site specific harms arising from development at the scale proposed are very limited.
- 5.5. Accordingly, development of this Site, in conflict with the out-of-date Development Plan, is justified. Material considerations (including the housing land supply shortfall, accepted need to utilise greenfield land to meet objectively assessed needs, and the sustainable location of this Site) support the grant of permission, despite the location outside of the settlement boundary of Arborfield Cross.

**Issue 2: The Principle of Development outside Defined Settlement Limits
(Reason for Refusal 1)**

- 5.6. The Council's position (as set out in reason for refusal 1) is that the principle of development is unacceptable, because the site is greenfield in nature, and is located in the countryside outside the settlement boundary, (and *detached from recognised settlement limits*). These factors, coupled with the proposed scale, renders (in the Council's view) the scheme unacceptable in principle due to conflict with a number of Development Plan policies and other guidance, as follows:
- CS CP1 (Sustainable Development).
 - CS CP2 (Inclusive Communities).

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- CS CP3 (General Principles for Development).
 - CS CP6 (Managing Travel Demand).
 - CS CP9 (Scale and Location of Development Proposals).
 - CS CP11 (Proposals Outside Development Limits).
 - MDD CC01 (Presumption in Favour of Sustainable Development)
 - MDD CC02 (Development Limits).
 - TB21 (Landscape Character).
 - A&BNHP IR1 (assumed to be IRS1 - Preservation of Separation of Settlements).
 - A&B NHP IR2 (assumed to be IRS2 – Recognise, Respect and Preserve Identity and Rural Setting of Settlements).
 - A&B NHP AD1 (New Development within Development Limits)
 - Borough Design Guide SPD
 - NPPF sections 2, 4, 8, 9, 12 and 15.

5.7. It is widely accepted that the Development Plan's settlement boundaries are out-of-date as they fail to address objectively identified housing needs as required by the NPPF. Policy CP17 of the CS (delivery of housing) is manifestly out of date, being based on historic South East Plan housing targets coupled with backlogs accrued under the Berkshire Structure Plan. The settlement boundaries in the Development Plan (CP9 and CP11) are aligned to the CP17 level of housing provision and as such they are also manifestly out of date. Furthermore, there is only 2.3 years' housing land supply (or, in the Council's view, 25. Years) which, as per footnote 8 NPPF, renders the most important policies out of date for the purposes of paragraph 11(d) NPPF. The tilted balance is clearly engaged; a point agreed between the parties (as recorded in the officer's report pages 13 and 29 of 36)

5.8. The Council accepts that the Development Plan settlement limits are out of date, as evidenced in the officer's report for the appeal scheme and also those of other recent schemes recommended for approval in Arborfield:

- Application Ref 232490 – Land off Langley Common Road, Arborfield
- Application Ref 250735 – Land to the north of School Road, Arborfield.

5.9. When recently allowing the appeal at Blagrove Lane (APP/X0360/W/24/3354667) (May 2025) the Inspector noted that Policy CP17 of the Core Strategy sought to deliver on the requirements of the abolished South East Plan (paragraph 9) and that this was prior to first

publication of the NPPF in 2012 (paragraph 14). Notably, the NPPF:

“introduced a shift in approach to boost significantly the supply of housing.

Hence, the CS’s approach to the delivery of housing did not follow the Framework’s method, and it has not been reviewed since it was adopted. Thus, the CS’s assessment of development needs does not reflect the current and previous versions of the Framework, which have housing requirement figures of 1,336 dwellings per annum (“dpa”) and 748 dpa respectively.

15. Consequently, the housing requirement has now considerably increased compared to CS Policy CP17, and it is inconsistent with the Framework’s aim of significantly boosting the supply of housing and meeting an area’s identified housing need. By extension MDD Policy CC02 and CS Policies CP9 and CP11 are also inconsistent with the Framework as they limit where development can go based on delivering the housing requirement in CS Policy CP17. Hence, this affects where the housing required to meet a higher level could potentially go.

16. The purposes of CS Policies CP9 and CP11 are to identify appropriate and sustainable areas for development that are well located for facilities and services, to protect the identity of settlements, and maintain the quality of the environment. These purposes are consistent with the aims of the Framework. However, despite recent Housing Delivery Test performances, the Council cannot currently demonstrate a five-year supply of deliverable housing sites. The latest agreed position is a supply of 1.7 years, which has decision-making consequences that I shall come to later, in that the most important policies for determining this application are deemed to be out of date.

17. I note the borough’s housing requirement rose due to last December’s Framework publication, but even prior to that appeal decisions show a progressively declining supply of deliverable sites (ranging from 4.84 years to 3.2 years pre-December 2024 Framework) against either a four or five year minimum as dictated by the Framework at the time of each decision. I put this down to the development plan coming towards the end of its plan period and delivering on what was a lower housing requirement, albeit one that was not a ceiling. Furthermore, planning permissions have been granted for housing schemes outside of the borough’s settlement limits. Hence, the current supply position is not solely down to the national policy change, which has only seen the supply position decline further.

18. *I note that the Council has submitted the Wokingham Borough Local Plan Update 2023-2040: Proposed Submission Plan ("emerging plan") for Examination in Public ("EiP"). The Council anticipates the hearing sessions will be complete by the end of 2025 and the emerging plan to be adopted around May 2026, and at this point, the borough's housing land supply position will be above the minimum five years. However, the EiP is at an early stage, and hearing sessions are yet to take place, and there is no indication of the Examining Inspectors view on the emerging plan."*

19. *While the appeal site may not be a proposed allocation, I need to consider this appeal on its own merits. It is a matter for the Examining Inspectors to determine whether the emerging plan is sound or not. Nevertheless, it is not certain that the Council's expectations on timescales will occur, and at best the emerging plan will not be adopted until this time next year. Thus, the current housing land supply position will not change overnight, and it may be that the emerging plan will look to allocate more housing sites in the countryside, and that may well be necessary.*

20. *For the time being, I consider CS Policies CP9, CP11, CP17 and MDD Policy CC02 frustrate the delivery of housing at the level that is required. They are therefore inconsistent with the Framework's objective to meet an area's identified need. However, that does not mean that those out-of-date policies (not only deemed out of date) carry no or little weight. In my opinion, given the purposes of the policies, they carry moderate weight, and moderate material harm would arise from the proposal's conflict with the spatial strategy."*

- 5.10. it is agreed, therefore, as per the reasoning above, that policies CP9, CP11, CP17 and MDD Policy CC02 are out of date as they fail to meet objectively identified housing needs. They frustrate delivery of identified housing needs.
- 5.11. The defined settlement limits are a spatial planning policy tool. Whilst the Site is detached from the defined settlement limit of Arborfield Cross, it is, in fact, adjacent to/attached to a defined settlement when experienced on the ground; this is the settlement of Arborfield as defined in the Village Design Statement and neighbourhood Plan (addressed at the outset of this statement). This settlement is the historic core of Arborfield. The Development Plan (the NHP) against which this Appeal is to be assessed) clearly identifies Arborfield (and the collection of houses around Church Lane) as a settlement in its own right.

The NHPs view on the identity of settlements should take priority over the out-of-date settlement limits or indeed the evidence being prepared for the Local Plan Update (noting the Settlement Hierarchy 2024 does not identify Arborfield's historic core as a defined settlement in its own right). The Development Plan carries more weight than the emerging, as yet untested, Local Plan Update.

- 5.12. We note that the Council has been content to approve other proposals *adjacent* to the settlement boundaries of Arborfield Cross and Arborfield Green (CD10.1 and CD10.2) but not this Site – and that is because the Appeal Site is *detached* from a settlement. That is to say, the Council supported speculative applications which abut *defined settlement boundary limits*, but not a scheme which abuts an existing settlement but is divorced from these out of date settlement limits. This shows excessive continued emphasis, and indeed reliance, by the LPA, on the historic spatial strategy which has already been found to be manifestly out of date.

- 5.13. This Site is adjacent to existing built form, including residential dwellings on Church Lane and Reading Road. The Council's landscape architect's response recognised there is development on three sides of the site (when discussing the fact the area has a settled character, albeit at lower density):

"The existing settled character around the site is sparse; to the north and west along Church Lane (a narrow lane with priority traffic), consisting of large dwellings in generous plots set within a pastoral landscape. Along Reading Road is a more recent development of detached modern 2 storey, and 2 storey and single storey dwellings with smaller gardens in Walden Avenue (a cul de sac), perpendicular to Reading Road."

- 5.14. The Appeal Site is clearly not a remote countryside location which is divorced from built form. It is situated in an area which the Council's own landscape officer says has a settled character.
- 5.15. The settlement boundaries are frustrating the delivery of much needed housing (to use the wording of the inspector in the Blagrove Lane appeal).

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- 5.16. It is clear that the Council continues to rely upon its out-of-date settlement limits when deciding how to address the housing shortfall via decision taking. Those speculative applications which are adjacent to settlement limits appear to have been received more favourably than those which are divorced from the same. As such it appears that the Council's position is that it will not support speculative applications which are divorced from a settlement limit. This is borne out in comments in the officer's report, as follows.
- 5.17. As recorded at page 29 of the officer's report the LPA's planning department have an 'in principle' objection to development in this location, outside a settlement boundary. The officer's report states (third paragraph on page 29) that the site is in "the wrong location" and "This is an underlying fundamental disbenefit of the scheme that cannot be overcome."
- 5.18. This reference to an inability to overcome the 'poor' location makes clear that the LPA have placed a significant amount of weight on the location beyond the settlement boundary (and divorced from the settlement limit), suggesting that no alternative form of development could have been acceptable on this Site. This is in direct contrast to the inspector's comments in the Blagrove Lane appeal (paragraph 19), that the settlement boundaries are 'frustrating delivery of housing at the level that is required' and that a conflict should be afforded only moderate weight in the planning balance.
- 5.19. In this case, there is little analysis in the officer's report of the actual settlement morphology on the ground and an absence of assessment of the impact of the proposal on settlement morphology. Questions of how the proposal would relate to the existing settlement pattern at Arborfield, and whether it would it abut existing residential development are neither identified, nor addressed. At the top of page 9 the officer opines that "there is no cohesive settlement in the locality of the site" and rather that the housing on Church Lane is simply 'low density housing' (but not a settlement). This contradicts the Neighbourhood Plan (which forms part of the Development Plan) analysis set out above and indeed that in the Village Design Statement.
- 5.20. As the Local Plan Update proposes significant growth at the Loddon Valley Garden Village Strategic Development Location (SDL) (see Settlement

Hierarchy 2024 (page 8) – CD6.18) it is possible that this settlement (Arborfield) will see significant growth on its northern side, bringing forward new schools, commercial space and housing in close proximity to the Appeal Site. The Council's planning policy officer, in their consultation response on this application noted that this SDL if adopted would be in proximity to the Site. However, their view was that this Appeal Site would not form a logical visual or spatial extension to that SDL because of the scale and layout of the properties along Church lane, Arborfield (that is, the existing Church Lane dwellings are large detached dwellings in large plots, fronting Church Lane, whereas the Appeal Scheme would be at higher density and would address Reading Road rather than Church Lane). Whilst these matters of design and character/ appearance are relevant to the reasons for refusal, it is helpful to note at this point that the essence of that consultation response is a recognition that the Appeal Site is adjacent to existing built form along Church Lane, rather than being a remote countryside location.

- 5.21. It is clear that the Council accepts a need for new development in the countryside to meet identified housing needs. The Council proposes that a large volume of this need could be met adjacent to the historic core of Arborfield (in the Loddon Valley SDL, adjacent to Church Lane, to its north). Whilst as yet untested at examination, this is a material consideration of limited weight. This Appeal Scheme proposes that identified housing needs could be addressed on the other side of that same settlement.
- 5.22. It is further noted that an application to bring forward that SDL site has now been submitted (see CD13.1 – C13.11 for parameter and illustrative plans showing the proposed location of the new schools, district and local centres, play space and pedestrian and vehicular links through that site).
- 5.23. In conclusion the site's location beyond a defined settlement boundary is in conflict with the Development Plan (Policies CP9, CP11, CC02 and AD4) but this conflict is afforded **limited weight**.

Issue 2: Quantum and Scale of Development (Reason for Refusal 2)

5.24. Reason for refusal 2 suggests that the proposed quantum of development (up to 111 dwellings) would have a scale, character and density that is out of keeping with the character and appearance of the countryside, resulting in harm to the locality. The Council's position, therefore, is that the Appeal Scheme conflicts with the following Development Plan policies and other material considerations:

- CS CP1 (Sustainable Development).
- CS CP3 (General Principles for Development).
- CS CP9 (Scale and Location of Development Proposals)
- CS CP11 (Proposals Outside Development Limits).
- MDD CC02 (Development Limits).
- MDD CC03 (Green Infrastructure, Trees, and Landscaping).
- MDD TB21 (Landscape Character).
- NHP IR2 (Recognise, Respect and Preserve Identity and Rural Setting of Settlements).
- NHP AD1 (New Development within Development Limits).
- NHP AD3 (High Quality Development with Generous Open Space, Properly Landscaped)
- Borough Design Guide SPD
- NPPF sections 2, 4, 8, 9, 12 and 15

5.25. The Council's landscape architect's opinion (CD2.22) on the character of the area was as follows (see consultation response dated 26.02.2025):

"The existing settled character around the site is sparse; to the north and west along Church Lane (a narrow lane with priority traffic), consisting of large dwellings in generous plots set within a pastoral landscape. Along Reading Road is a more recent development of detached modern 2 storey, and 2 storey and single storey dwellings with smaller gardens in Walden Avenue (a cul de sac), perpendicular to Reading Road."

5.26. Thus, whilst she accepted that the area to the north, west and south (Reading Road) of the Site was settled (as opposed to undeveloped, open land), she considered the scale of existing development to be lower density/heights to that now proposed. The planning policy officer's comments (CD2.20) similarly states that the Appeal Site is adjacent to large dwellings in large plots along Church Lane.

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- 5.27. The proposed quantum of development (up to 111no dwellings on this 6.44ha site) equates to 17 dwellings per hectare gross/ 28 dwellings per hectare net. The landscape principles/design principles set out in the Application Documents identify that at reserved matters stage, building heights should be a maximum 2.5 storeys so as to tie in to the surrounding built form (as per section 6.2 of Landscape and Visual Appraisal submitted with the application (CD1.16) and page 31 of the Design and Access Statement, CD1.4). The Design and Access Statement set out an analysis of prevailing building heights in surrounding roads, with photos of existing built form, which underpinned this.
- 5.28. The Council suggests that prevailing densities on Waldren Ave are 11dph and just 4ph on Church Lane. Given the significant housing land shortfall, a net density significantly lower than 28dph (that is to say, a density of say 4 or 11 dph) on the development plots would fail to make efficient use of this land resource.
- 5.29. Notably the Council officers recommended approval for the School Lane proposal (CD10.1 – see Officers report paragraphs 47 – 49) approximately 1km east of the Site (and the committee followed this recommendation). This was despite a density of 22dph (70 dwellings on 3.21 net developable area) which was acknowledged as being higher than the prevailing character of Arborfield Cross, at 18dph (excluding open space/ non-residential areas). Significant weight was given to the harm to the setting of the village (in landscape and character terms) but this (along with other harms such as loss of valued landscape and a highways objection) did not significantly and demonstrably outweigh the benefits of delivery of 70no. homes.
- 5.30. The requirements, in CP1, for high quality environments and attractive functional schemes can be met, as shown on the Illustrative Masterplan (CD1.9). Policy CP3 requires that development be of an “appropriate scale of activity, mass, layout, built form, height, materials and character to the area together with a high quality of design without detriment to the amenities of adjoining land users including open spaces or occupiers and their quality of life.” It is considered that the scale of development (up to 111 dwellings) can comfortably be accommodated on this 6.44ha Site at a scale and massing which is not out of keeping with the surrounding area and which will not impact

their amenity. At least 12,660m² of public open space will be delivered (in excess of the policy requirement) which does not include the additional triangular area to the west of the Site which would also be utilised for green infrastructure. A childrens' play area is also proposed as shown on the illustrative plan. The requirements of Policy CC03 (Green Infrastructure, Trees and Landscaping) are met, and in accordance with Policy TB21, and as outlined in the Proof of Evidence of Mrs Clare Brockhurst, the proposals enhance the condition, character and features which make an important contribution to the landscape. There will inevitably be a change to the rural setting of Arborfield (IRS2) which is addressed below, in relation to reason for refusal 3. The requirement for 'high quality development with generous open space, properly landscaped' (Policy AD3 NHP) is also met.

- 5.31. In conclusion, the scale and quantum of development is considered appropriate on this Site.

Issue 3: Impact on the Landscape and Countryside (Reason for Refusal 3)

- 5.32. The Council's position, as set out in reason for refusal 3, is that the Appeal Scheme would have a "detrimental impact on the landscape and character & appearance of the area by reason of the loss of fields, paddocks and green infrastructure in the countryside and the erection of a large housing development that is out of keeping with the locality." On that basis the Council cites a conflict with the following Development Plan policies and other guidance:

- CS CP1 (Sustainable Development).
- CS CP3 (General Principles for Development).
- CS CP9 (Scale and Location of Development Proposals).
- CS CP11 (Proposals Outside Development Limits).
- MDD CC02 (Development Limits).
- MDD CC03 (Green Infrastructure, Trees, and Landscaping).
- MDD TB21 (Landscape Character).
- NHP IR2 (assumed to be "IRS2" - Recognise, Respect and Preserve Identity and Rural Setting of Settlements)
- NHP AD1 (New Development within Development Limits)

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- NHP AD3 (High Quality Development with Generous Open Space, Properly Landscaped)
 - Design Guide SPD,
 - the Wokingham District Landscape Character Assessment
 - NPPF sections 12 and 15.

5.33. The Appellant's position is set out in Proof of Evidence of Mrs Clare Brockhurst. In summary, views into the Site are largely obscured from all directions by dense vegetation, hedgerow and built form, with only occasional glimpses of taller elements such as powerlines and rooftops. Any views of the Site are limited to close distance views and a handful of medium distance views, mainly from the south-east. There are no long-distance views of the Site.

5.34. The Council's Valued Landscape Assessment (CD6.19), prepared in connection with the Local Plan Update, proposes designation of valued landscapes across the borough but does not include the Appeal Site in this proposal. As such, the Council clearly do not consider the Appeal Site to be a valued landscape for the purposes of paragraph 187 (a) NPPF. Landscape is not, in this case, a footnote 7 matter, and the harm to the landscape attracts **moderate** weight in the planning balance.

5.35. As noted above, the Council resolved to approve the School Lane proposal (CD10.1) (70no.dwellings at Arborfield Cross) despite not only a higher density (than the surrounding area) but also the site's position within the proposed 'valued landscape' area. Even when placing significant weight on those factors (see paragraph 220 officer's report), these harms did not significantly and demonstrably outweigh the various benefits including 70no. homes. It is also notable that the Council only considered that site to be 'sub-optimal' in locational terms and still somewhat reliant on the private car (see paragraph 220).

5.36. As accepted elsewhere in this proof of evidence, policies CP9, CP11, CC02 and AD1 (referenced in regard to reason for refusal 3 as well as reason 1) are not met due to the location beyond the settlement boundary.

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- 5.37. Policy CP1 requires that the high quality of the environment be maintained or enhanced. As detailed in the Proof of Evidence of Mrs Clare Brockhurst, important landscape features have been identified, (including the trees, hedgerows, grassland and grain and form of the contemporary settlement edge) and key features have been retained and incorporated in to the proposals, which addresses the requirements of CP1, CP3 and also Policy TB21 (which requires that proposals retain or enhance the condition, character and features that contribute to the landscape).
- 5.38. New landscape measures are proposed to enhance the condition and functionality of the landscape and increase the diversity of landscape assets in a positive manner. The proposals adhere to the Council's guidelines in respect of Green Infrastructure delivery (Policy CC03) but it is noted that that policy contains a general restraint against the loss, fragmentation or isolation of areas of green infrastructure. As such, there is a degree of conflict with this policy (CC03) given the landscape would change from greenfield to a developed site, albeit one set within generously landscaped surrounds.
- 5.39. There will be no erosion of the physical, visual or perceptual gap between the settlements for the purposes of Policy IRS1 as the character and appearance of the landscape beyond the Appeal Site and within the gap towards Arborfield Cross will remain as farmland with farm buildings.
- 5.40. Policy IRS2 requires that the identity and rural setting of settlements be preserved, with respect to scale and form of the development, density, materials, tree and hedgerow planting and the distinctive character of the landscapes of the borough and outstanding views. At reserved matters stage further detail will be developed on the sale and massing and landscape strategy for the proposals. The masterplan shows that the development plots are set within a generous landscaped/open space with additional tree planting. The evidence of Mrs Brockhurst confirms that the Site is visually well contained, and there will be no impacts on the views identified in the NHP. Therefore, whilst development on an undeveloped Site has the potential to change the setting of the nearby settlement, the generous open buffers will assist in limiting harmful effects.

- 5.41. Policy CP3 also requires the provision of open space and amenity space in accordance with the specified standards and these are met and exceeded. 12,660m² of public open space is delivered on the part of the Site to the east of the 'Main River' which runs broadly north-south to the west. This compares to a policy requirement for 12,412m².
- 5.42. The Appellant's position is that the impact on landscape and character, which conflicts with CC03, TB21 and IRS2 attracts **moderate** weight.

Issue 4: Sustainability of the Location (Reason for Refusal 4)

The Council's Position

- 5.43. Reason for refusal 4 sets out the case officer's view that the Appeal Site is situated in an unsustainable location, by reason of the countryside location outside of defined settlement limits, and also due to the distances to facilities and services and quality of the local walking environment. On that basis the Council's position is that the Appeal Scheme would fail to encourage a modal shift towards sustainable modes of transport, and would therefore conflict with the following Development Plan policies and other material considerations:
- CS CP1 (Sustainable Development).
 - CS CP2 (Inclusive Communities).
 - CS CP3 (General Principles for Development).
 - CS CP6 (Managing Travel Demand).
 - CS CP11 (Proposals Outside Development Limits).
 - MDD CC01 (Presumption in Favour of Sustainable Development).
 - MDD CCO2 (Development Limits)
 - Borough Design Guide SPD and
 - NPPF sections 8 & 9.
- 5.44. By contrast, the Highway Authority confirmed they have no objection to the proposal (CD2.17 to CD2.19). As such, the LPA's decision departs from the statutory consultee's response.
- 5.45. In their initial response (CD2.17) the Highway Authority sought further information. A response was duly provided (CD1.26) along with amended

highway access drawings (CD1.28, 1.29 and 1.30), which were annotated to provide more detail on pedestrian improvements and visibility splays and the access design amended to allow for 6m (as opposed to 5.5m) width. The Highway Officer then submitted a final consultation response confirming no objection to the proposal (CD2.19). That final response confirms that a) all necessary information was provided by the applicant/ appellant, b) there is access to a good bus service from the site, and c) the various contributions offered (to the Arborfield Bus Strategy/ bus stops and pedestrian routes) would be welcome additions improving the sustainability of the Site to be factored into the planning balance.

- 5.46. There is no suggestion in the Highway Officer's response that the location was considered to be unsustainable in highway terms. Indeed the officer confirmed, during a meeting with the applicant's team that he did not consider the location to be unsustainable, given the above factors. Therefore, the planning department's view departs from the highway officer's (as statutory consultee) response.
- 5.47. Furthermore, the Council resolved to approve 70no. dwellings at School Road, Arborfield (CD10.1) despite finding it to be a 'sub-optimal' location in sustainability terms (see paragraph 220 officer's report) where there would continue to be a degree of reliance on private cars. In that case, that factor was afforded only moderate weight in the planning balance.
- 5.48. The Appellant's position is that the Appeal Site benefits from regular bus service and is walkable/cyclable to the services and facilities of Arborfield Cross and Arborfield green beyond this.
- 5.49. A package of measures have been proposed to improve pedestrian links from the Site to Arborfield Cross, along with measures to improve bus services to larger centres. These are detailed in the Proof of Evidence of Matthew Stevens.
- 5.50. Accordingly, it is considered that the Appeal Scheme meets the requirements of Policies CP1, CP2, CP3, CP6, CC01. It is accepted that the proposal conflicts with Policies CP11 and CC02 (which relates to the location between

settlement limits, as addressed above in respect to reason for refusal 1).

Issue 5: Loss of Agricultural Land (Reason for Refusal 5)

- 5.51. The Council's position is that the Appeal Scheme would result in the loss of Best and Most Versatile ("BMV") agricultural land, due to a small part of the Appeal Site being classified as Grade 3a Agricultural Land. As such, the Council considers that the proposal conflicts with Core Strategy Policy CP1 (Sustainable Development) and section 15 of the NPPF.
- 5.52. An Agricultural Land Classification report submitted during the course of the Application (CD1.33) concluded that only 0.7ha of the 6.4ha site (11% of the total area) is Grade 3a land, with the remainder falling within grade 3b/4/non-agricultural (3.6 of the report). As such only 11% of the Appeal Site comprises 'BMV' Agricultural Land. The higher quality land is the triangular portion of land to the west of the Site which is shown on the illustrative masterplan as retained for landscaping/ open space with no built form proposed. This small 0.7ha parcel would not be viable for economically productive agricultural use. Further we note this Site is not presently in active agricultural use for food production (nor has it been in recent history). The loss of BMV at this very limited scale is to be weighed in the planning balance and is to be afforded **very limited** weight.
- 5.53. The Council's position on loss of BMV Land can be seen in other recent decisions nearby, including two which were recommended for approval despite the loss of larger areas of BMV.
- 5.54. Application 250735 – Land at School Lane, Arborfield (CD10.1) was recommended for approval and the Planning Committee resolved to grant the scheme (subject to s106) on 9 July 2025). That proposal, for up to 70 dwellings, involved the loss of 1.1ha of BMV Land (as compared with 0.7ha in this case). Yet the Council took the view that such loss would only cause minor harm in the overall planning balance:

"Officer comment: the proposal would result in loss of 1.1 hectare of agricultural land of 3a classification. Whilst this would result in a loss of Best and Most Versatile Land, it is considered that only a relatively small amount of land

classified as BMVL would be lost. As such, the resultant harm would be minor, but is considered within the overall planning balance.” (Application 250735 Officer’s Report, page 9).

5.55. Similarly, the Council’s Planning Committee resolved, on 13 November 2024, to approve a scheme of up to 50 dwellings at Land off Langley Common Road, Arborfield (Application Reference 232490) (CD10.2). The officer in that case is the same officer who prepared the officer’s report for the Appeal Scheme. As noted at paragraphs 36-40 of the officer’s report for that scheme, the site comprised Grade 2 and 3a agricultural land and therefore involved the loss of BMV Agricultural Land. A review of the Agricultural Land Survey submitted with the application shows that 25% of that site is Grade 3a BMV (equating to 0.6ha of land).

5.56. Whilst noting that Policy CP1 seeks avoidance of the use of BMV, and the NPPF⁵ requires recognition of the economic and other benefits of BMV, the officer placed only limited weight on the loss of BMV, stating:

“Aerial photographs show that the site has not been used for arable farmland since at least 1999 and therefore has had no commercial production in at least the last 20 years. This alongside the fact that the site represents a very small proportion of the overall BMV resource within the Borough, only limited weight can be afforded to the economic implications arising from the loss of BMV in this instance. Furthermore, the NPPF (footnote 62) accepts that there are instances where the loss of BMV is necessary, and in this instance, any loss and economic implications must be balanced against the clear need within the NPPF to meet the borough’s identified housing needs. These social and economic factors will be weighed in the overall balance.” (paragraph 39 officers report).

5.57. And then, when undertaking the planning balance (and finding overall that the 50 dwelling scheme’s benefits would not be significantly and demonstrably outweighed by its harms) he said as follows:

⁵ Paragraph 187 of the December 2024 version of the NPPF (although at the time of that report, the relevant reference was paragraph 180 NPPF)

“Economic

121. As with all housing development of this scale in this location, the proposal would result in economic benefits. This is broadly set to arise from the short-term economic contribution of the construction of up to 50 homes via construction industry jobs. In the longer term, future residents of the dwellings will contribute to the viability and vitality of businesses in the village and nearby towns. CIL payments and New Homes Bonus would also be an economic benefit of the proposal. In terms of economic costs, the development would result in the likely loss of a small proportion of the boroughs BMV. On the whole, the size of the development means these benefits are not insignificant and are positively balanced. The development is therefore considered to perform a positive economic role.” (para 121 officer’s report).

5.58. And:

“125. As noted, there are factors that weigh negatively in the planning balance including the overall conflict with the spatial vision of the development plan, the localised landscaping impact which would come about through the effective enlargement of the existing settlement, and the loss of a small area of BMV land. However, it must be recognised that the conflict with the spatial strategy is considered against the context of a housing land supply shortfall. Any economic harm tempered due to the limited agricultural contribution made by this land in the borough.” (para 125 officer’s report).

5.59. In the recent appeal decision APP/X0360/W/25/3364304 (Land between Lodge Road and Tape Lane, Hurst RG10 0EG) (decided 9 October 2025) (CD10.6) the inspector gave limited weight to the loss of approximately 5ha of BMV land, which equates to approximately half of that site. The land was not part of an active agricultural operation and “given development pressures in the borough, it is also inevitable that some agricultural land will need to be built upon, which is likely to give rise to the loss of at least some best and most versatile agricultural land.” It is understood that Mr Croucher, giving evidence for the Council at that inquiry, gave only modest weight to the loss of BMV in that case.

- 5.60. The Council proposes strategic scale development at Hall Farm/Loddon Valley to the north of the Site. The application recently submitted for that site is supported by an Agricultural Land Classification report (CD13.12), the final page of which shows that a) significant parts of that site are Grade 3a BMV land, and also that b) the Appeal Site is not an isolated pocket of good quality BMV land, rather there are extensive areas of good quality agricultural land in the immediate locality.
- 5.61. This Appeal proposal results in the loss of small 0.7ha parcel of Grade 3a land in conflict with Policy CP1 of the Development Plan. That land, however, has not been used for active agricultural food production at any point in recent history. It represents a very small proportion of the overall BMV resource in the Borough and only very limited weight can be afforded to its loss. Furthermore, the Appeal Scheme delivers more dwellings than either of the two examples above where the Council took a more positive stance. Overall, the economic factors of this scheme (with up to 111 dwellings) are, overall, positive. At most, **very limited weight** is attributed to the loss of BMV.

**Issue 6: Flood Risk and Impact on Main River Watercourse
(Reason for Refusal 6)**

- 5.62. Reason for refusal 6 suggests that insufficient information has been provided to demonstrate that the proposed development will not adversely impact on flood risk or the Main River Watercourse within/adjacent to the Appeal Site. On that basis the Council considers the proposal to be in conflict with the following Development Plan policies:
- CS CP1 (Sustainable Development).
 - CS CP3 (General Principles for Development).
 - MDD CC10 (Sustainable Drainage).
 - NHP AD4; and
 - Section 14 NPPF.
- 5.63. The FRA and Drainage report submitted with the Application identify that the Appeal Site is bisected by a drainage ditch which is classified as a 'Main River.'

As such an 8m setback was maintained in the Illustrative Masterplan to allow for ongoing maintenance. There is also a watercourse running adjacent to the southern boundary which is also categorised as a Main River. At the time of application submission, the Site lay wholly within Flood Zone 1. The Environment Agency's Flood Maps for Planning have subsequently been updated and there are now small areas of the Appeal Site contained within Zone 2/3. An extract of the EA's Flood Map is provided at Appendix BT2 to this Proof. There is a small area of risk on the western Site boundary (within the vegetation on the boundary) and along the line of the Main River. No development is proposed in those areas. The boundary vegetation is to be retained, and the Main River corridor will remain in situ with an 8m set back as required. The Illustrative masterplan identified a potential footpath link across the Main River so as to access the green area in the west of the Site. No formed vehicular access across the Main River (and therefore across the elevated Zone 2/3 area) was or is proposed. The parcel of green space in the west of the Site is additional to the open space requirements generated by the proposals and is anticipated as being used for biodiversity enhancement/net gain. As such, pedestrian access to this portion of the site via footbridge across the Main River is not an essential element required to make the scheme acceptable in planning terms. The footbridge would not land in Zone 2/3 and therefore there would be no structure / land take within that zone.

- 5.64. On this basis, it is clear that the requirement for a Sequential Test (ST) is not triggered as no development is proposed in Flood Zones 2/3. NPPF paragraph 175 states that a ST should be used in areas at risk of any form of flooding "except in situations where a site-specific FRA demonstrates that no built development within the site boundary, including access or escape routes, land raising or other potentially vulnerable elements, would be located on an area that would be at risk of flooding from any source, now and in the future (having regard to potential changes in flood risk)."
- 5.65. While there are parts of the Site which experience elevated surface water this is capable of mitigation as set out in the Drainage Strategy. As per the recent changes to the Planning Practice Guidance, (para 27 Reference ID: 7-027-20220825) a proportionate approach is needed in the case of surface water:

“ Where a site-specific flood risk assessment demonstrates clearly that the proposed layout, design, and mitigation measures would ensure that occupiers and users would remain safe from current and future surface water flood risk for the lifetime of the development (therefore addressing the risks identified e.g. by Environment Agency flood risk mapping), without increasing flood risk elsewhere, then the sequential test need not be applied.”

- 5.66. Therefore, the need for a ST is not triggered as no built development is proposed within Zones 2/3 and a site specific flood risk assessment has clearly demonstrated that occupiers will be safe from surface water flood risk for the lifetime of the development without increasing flood risk elsewhere. The Illustrative Masterplan (CD1.9) shows a potential pedestrian footbridge into the triangular area of open space to the west of the Site but notably that parcel of land is not required in order to meet the necessary open /green space requirements. As such, the pedestrian footbridge over the Main River (crossing over the top of the narrow Zone 2/3 strip, but not landing within such zone) is not essential to make development acceptable in planning terms.
- 5.67. The Council's Drainage Officer made no objection to the proposal in terms of flood risk or drainage. The consultation response records this point and suggests wording for a condition to refine the drainage strategy at detailed design/ reserved matters stage.
- 5.68. The Environment Agency (EA), however, objected to the proposal on the basis of risk to water quality (rather than flood risk).
- 5.69. Further information was submitted by the Applicant following direct liaison with Thames Water to confirm that their business plan for 2025-2030 includes upgrades and extension of capacity to accommodate growth. Thames Water expressly stated that they disagreed with the EA's response to the application, and do not consider the development would contribute to unacceptable levels of water pollution (para 187 NPPF) or adversely affect water quality.
- 5.70. The officer's report, in relation to this reason for refusal, appears to raise concerns about water quality impacts arising from the need to culvert over the drainage ditch along the southern Site boundary in order to upgrade the access

into the Site. (Page 24-25 of office's report). An environmental permit would be required for these works, due to the location within 8m of the Main River, and it is expected therefore that the environmental permitting regime would ensure no unacceptable impacts to water quality as a result of these works. The detailed design of the culvert will follow at reserved matters stage when the precise quantum of development and layout is developed. The planning system should not be used to duplicate regulatory controls which already exist (that is the environmental permitting regime).

- 5.71. The Appellant's position therefore is that there is no unacceptable risk to water quality, or indeed in terms of flood risk, and no conflict with Development plan policy arises in this regard.

Issue 7: Mitigation of Impacts on Thames Basin Heaths SPA (Reason for Refusal 7)

- 5.72. The Appeal Site is within the 5km Zone of Influence around Thames Basin Heaths SPA. Regulation 63(1) of the Conservation of Habitats and Species Regulations 2017 (as amended) ("the Habitat Regulations") requires a Competent Authority ("CA") to make an Appropriate Assessment ("AA") of the implications of any plan or project potentially affecting a site with regard to the site's conservation objectives. Regulation 63(5) says that the CA may, in light of the conclusions of the AA, agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site.
- 5.73. As the Appeal Scheme is not connected with/ necessary for nature conservation, it is agreed between the parties and Natural England that the proposed population increase on the Appeal Site is likely (in the absence of mitigation) to result in significant effects on the SPA due to recreational disturbance.
- 5.74. The Appellant proposes to secure credits in Council-owned SANG which can be secured either through S106 discussions or through the imposition of a Grampian-style condition.

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- 5.75. The Council has adopted a mitigation strategy, which delivered Council-led SANG sites and provides for SAMM measures (management and monitoring) to which non-strategic sites can make a financial contribution. Rooks Nest Wood in Barkham was approved as SANG in 2009 and opened in 2011. The Council's emerging Local Plan evidence base Sept 2024 (Topic Paper: Suitable Alternative Natural Greenspace (SANG) – CD6.23), indicates that as of September 2024 there is some remaining capacity in this SANG. It is also proposed by the Council that Rooks Nest SANG be extended, to accommodate additional development in the emerging Local Plan.
- 5.76. The Council has confirmed they are unwilling to make this SANG available for speculative development. The Appellant's agent sought confirmation from the case officer whether the Council will allow the appellant to utilise the Council's SANG. In their response (6 June 2025 email from Mark Croucher) (CD1.35) the Council state "most major application are mitigated by Rooks Nest Wood. However, where this site is outside of the WBC spatial strategy then SANG mitigation would need to be via a third party SANG. The council would not be agreeable to using strategic SANG capacity for sites that are not in accordance with the Development Plan."
- 5.77. In Appeal Decision APP/A1910/W/23/3333545 (Rectory Farm, Kings Langley, Hertfordshire, Dacorum, WD4 8HG) (CD11.1), at paragraph 32, the inspector said it would be "the epitome of unreasonableness" for that Council (Dacorum) to refuse to release SANG to the appellant if permission were granted on appeal. The Appellant takes a similar position.
- 5.78. Subject to securing the necessary mitigation, the Appeal Scheme is compliant with Policies NRM6 South East Plan, CS CP8 (Thames Basin Heaths SPA); and CS CP4 (Infrastructure Requirements).

6. Consultation Responses and Public Representations

6.1. A number of internal and external consultees raised no objection to the Appeal Scheme (where appropriate, subject to conditions/ s106 legal agreement):

- WBC Built Heritage Officer
- WBC Drainage
- WBC Highways
- WBC Affordable Housing
- Thames Valley Police
- Berkshire Archaeology
- Royal Berkshire Fire and rescue
- WBC Ecology and Nature Space (requested further information which was duly supplied).

6.2. Those consultees who did object raised issues which form the basis of the reasons for refusal and are therefore addressed in this Statement. This includes comments from WBC Planning Policy, WBC Landscape and Trees, The Environment Agency, and the NHS.

6.3. Public consultation responses are discussed from page 3 of the Officer's Delegated Report, where the local resident concerns/objections are summarised as relating to the following themes and topics:

- Consistency with, and impact on the character of the surrounding area.
- Scale and quantum of development/ density/building heights.
- Loss of open countryside.
- Sustainability of the location/ reliance on private cars.
- Flood risk and surface water drainage.
- Capacity of water treatment plant on Reading Road.
- Utilities (electricity) and water supply.
- Width of pedestrian pavement on Reading Road and lack of complete connectivity to Arborfield Cross.
- Impact on biodiversity, trees and green infrastructure.
- Traffic impacts and pollution.
- Impacts on capacity of local services (doctors, dentists, school).
- Neighbour amenity/ impact on privacy.
- Extent of other development in the area.
- Greenfield nature of the Appeal Site.

- Status of Local Plan Update and speculative nature of the Application; HELAA assessment.
 - Availability of the land (agricultural tie).
- 6.4. The issues raised by interested parties (beyond those raised in the Reasons for Refusal, which are addressed above) have been addressed by the various statutory consultee responses (e.g. County Highways, the LLFA and EA) and/or by the Officer's Delegated Report. In addition, the impact of the Appeal Scheme upon local services and facilities will be mitigated through the package of measures to be secured through the S.106 agreement and through the financial sum to be secured through CIL.
- 6.5. The Appellant will address issues raised by interested parties as necessary in evidence, but do not consider that any of them would constitute reasons for dismissing the Appeal.

7. Planning Obligations and Conditions

Planning Obligations

7.1. The Appellant will negotiate with the Council an appropriate planning obligation mechanism under the provisions of Section 106 of the Town and Country Planning Act 1990 (as amended) to secure developer contributions to address the following:

- Strategic Access Management and Monitoring contribution relating to the Thames Basin Heaths Special Protection Area.
- Training, apprenticeships, and other vocational initiatives to develop local employability skills.
- Affordable Housing provision on the Appeal Site.
- Financial contributions towards sport and recreational facilities.
- Off-site pedestrian improvement works to be secured via s278 agreement.

7.2. A signed and dated Section 106 agreement will address reasons for refusal 7, 8, 9 and 10.

Conditions

7.3. The Appellant will work with the Council to agree a suitable list of conditions in advance of the hearing.

8. Planning Balance

General

- 8.1. As in all cases, the Appeal must be determined in accordance with the development plan unless material considerations indicate otherwise. In this case, there is a degree of conflict with the Development Plan, in so far as the Site is located beyond the settlement boundaries established under policies CP9, CP11, CC02 and AD1 of the Development Plan. The proposal also conflicts with the requirement in CP1 to avoid the development of BMV agricultural land and policies CC03, TB21 and IRS2 which seek avoid loss of any green infrastructure (in this green, an undeveloped greenfield but not identified as being of any particular importance) /landscape features and which seek to preserve the rural setting of settlements.
- 8.2. However, as set out above, the development plan is out of date because (i) it fails to plan for delivery of identified housing needs using an NPPF compliant assessment of housing need, and fails to significantly boost housing supply as per the objective set out in the NPPF; and (ii) the Council is not able to demonstrate a five-year supply of deliverable housing land.
- 8.3. Accordingly, the conflict with the Development Plan policies relating to settlement boundaries is only afforded **limited** weight. The conflict with CP1 as to loss of BMV land is afforded **very limited** weight and the conflict with CC03, TB21 and IRS2 (landscape policies) is afforded **moderate** weight.
- 8.4. Moreover, the “most important policies” for determining the appeal are out-of-date for the purposes of paragraph 11(d) of the NPPF. As there are no strong reasons for refusal in respect of footnote 7 matters, permission should therefore be granted unless:

“any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing

well-designed places and providing affordable homes, individually or in combination⁶

The Reasons for Refusal and Impacts of the Proposal

8.5. The Council's decision notice states ten reasons for refusal. However, four of these (reasons 7, 8, 9 and 10) are matters that can be resolved via execution of legal agreements to secure various mitigation measures. Accordingly, these reasons can be fully addressed by the Appellant negotiating an agreement or agreements with the Council. The Appellant shall seek to address these matters as early as possible with the Council so as to make efficient use of the inspectorate's time and resources.

8.6. In summary the Appellant's position on the first 6 reasons for refusal is:

- Principle of development – it is accepted that the proposal conflicts with the Development Plan's spatial strategy (Policies CP9, CP11, CC02 and AD1), but this conflict is afforded only **limited weight** as these policies are manifestly out of date.
- Quantum of development – the proposed density makes efficient use of the Site. Whilst the proposed density differs from that of the very low density housing to the north and west, it is considered that the proposal will still relate to the surrounding built form. The Council has accepted that development of the School Lane site at Arborfield Cross could rightly come forward at higher density than the surrounding area, in order to make efficient use of the site. I conclude a similar conclusion is warranted here. The requirements of CP1, CP3, Policy CC03, Policy TB21 and AD3 NHP, as referenced in the decision notice and relation to questions of scale/massing and the quantum of development, are met. In conclusion, the scale and quantum of development is considered appropriate on this Site.

⁶ The policies referred to are those in paragraphs 66 and 84 of chapter 5; 91 of chapter 7; 110 and 115 of chapter 9; 129 of chapter 11; and 135 and 139 of chapter 12. (NPPF Footnote 9)

- Landscape and Countryside – the Site is not a valued landscape and there are limited and localised views. The change in landscape character is in conflict with Policies CC03, TB21 and IRS2 (which seek to avoid loss of any green infrastructure and preserve the rural setting of settlements), which attracts **moderate** weight.
- Sustainability of the Location – the Site is a sustainable location for development given the regular bus service and walkable/ cyclable access to services and facilities (including primary school) at Arborfield Cross and Arborfield Green (including secondary school). It is considered that the Appeal Scheme meets the requirements of Policies CP1, CP2, CP3, CP6, CC01. It is accepted that the proposal conflicts with Policies CP11 and CC02 (which relates to the location beyond settlement limits, as addressed above in respect to reason for refusal 1 – principle of development).
- Loss of Agricultural Land – The proposal does involve the use of a small area of BMV, in conflict with Policy CP1 of the Development Plan and NPPF. However, due to the very small quantum of land involved, its lack of agricultural use and low proportion of wider BMV resources, this conflict is afforded **very limited** weight.
- Flood Risk and Impact on Main River Watercourse – the proposal is safe for its lifetime, and there was no objection from the Council's drainage officer. The need for a ST is not triggered. This reason for refusal appears to relate to water quality concerns (as opposed to flood risk considerations), on the basis of comments in the officer's report regarding access works near the Main River. Such matters are suitably controlled via design detail at reserved matters stage and operation of the Environmental Permitting regime. No conflict arises in respect of Development Plan Policies CP1, CP3, CC10, AD4 nor section 14 of the NPPF.
- Mitigation of Impacts on Thames Basin Heaths SPA – the applicant is prepared to agree suitable mitigation but it's ability to do so to date has been frustrated by the Council's unwillingness to agree to allocate SANG

capacity to speculative development. The Appellant anticipates that this matter could rightly and fairly be resolved via the s106 process. Subject to securing the necessary mitigation, the Appeal Scheme is compliant with Policies NRM6 South East Plan, CS CP8 (Thames Basin Heaths SPA); and CS CP4 (Infrastructure Requirements).

Scheme Benefits

- 8.7. This section considers the Appeal Scheme in the context of the three sustainability tests set out at paragraph 8 of the NPPF.

Economic

- 8.8. The Appeal Scheme satisfies the economic role of sustainability including through the provision of housing to support growth and the associated provision of infrastructure, to be secured through preparation of the S106 agreement and by on-site provision of affordable housing.
- 8.9. The Appeal Scheme generates a series of local and Borough-wide economic benefits including through (i) construction of the scheme and the range of employment generated as a result; and (ii) the on-going expenditure from the households purchasing and occupying the new homes.
- 8.10. The principal economic benefits arising from the scheme are summarised below:
- (i) Increased house building in an area where there is both need and demand for new housing that in turn drives economic growth further and faster than any industry. In this regard the proposals will contribute to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is being made available in the right place and at the right time to support growth.
 - (ii) The economic benefits associated with provision of up to 111 new homes in the Borough where there is an established need for housing given the demonstrable shortfall in the four-year housing land supply position.
 - (iii) The economic benefits associated with delivery of much needed affordable homes (up to 44 dwellings) that will meet the acute need for affordable housing within the Borough.

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- (iv) Meeting general housing needs is a substantial economic benefit, consistent with the Government's objective of significantly boosting the supply of housing.
 - (v) In order for the economy to function, sufficient housing is required in the right locations and at the right time. This Site represents a location where there would be no significant adverse effect upon the landscape nor on the amenity of neighbouring properties.
 - (vi) Based upon a multiplier of 3.4 jobs per new home⁷, then up to 111 dwellings are estimated to create approximately 377 new jobs.
 - (vii) Increased expenditure in the local area will support local FTE jobs.
 - (viii) Helping to deliver a significant boost to the local economy through 'first occupation' expenditure of £839,599.89⁸. This is expenditure on new furniture and other household goods that residents spend as 'one-offs' when moving into a new home.
 - (ix) In terms of household expenditure, data from the ONS Family Expenditure Survey 2021-22⁹ shows that the 'average UK household spend' is £526.10 per week (Table A33) (or £27,357.20 per year), whereas in South East England it is 16.4% higher than the UK average (Table A33). This means average weekly spend per household is £612.40 (or £31,844.80 per annum). For the Appeal proposal, the total gross expenditure is estimated to be around £3.5million per year to the economy. A proportion of this household expenditure is anticipated to be spent in local shops and services and will help sustain the existing services in Wokingham Borough including those local to the Appeal Site. The expenditure per household will include a proportion of that spent on areas including food & non-alcoholic drinks (£70.90 per week); alcoholic drinks (£12.90 per week); recreation and culture (£69.30 per week), household goods and services (£39) and miscellaneous goods and services i.e. hairdressing & beauty treatments (£47 per week).¹⁰ Given the current economic challenges facing the UK these are significant economic benefits.
 - (x) Increase in Council Tax receipts annually to the Borough Council
 - (xi) Contribution towards Community Infrastructure Levy.

⁷ See page 8 of the Homes Builders Federation "Economic Footprint of UK Housebuilding " (Sept 2024) - https://www.hbf.co.uk/documents/13965/The_Economic_Footprint_of_Home_Building_in_England_and_Wales_report_-_September_2024_v.pdf

⁸ Research carried out by OnePoll on behalf of Barratt Homes (August 2014; <https://www.barratthomes.co.uk/the-buying-process/home-buying-advice/>) which shows an average of £5,462 per dwelling – Updated at July 2025 via Bank of England Inflation Calculator.

⁹ Family spending workbook 3: expenditure by region - Office for National Statistics (ons.gov.uk).

¹⁰ Figures based upon SE Regional data in Table A33

- 8.11. By providing land of the right type, in the right place, and at the right time to support economic growth, the development of up to 111 dwellings on the Appeal Site fully accords with the objectives at paragraph 8 of the NPPF and assists in the aims of the NPPF in helping to build a strong and competitive economy.
- 8.12. This is further emphasised in the Government's November 2011 Paper 'Laying the Foundations: A Housing Strategy for England' where paragraph 11 states *"getting house building moving again is crucial for economic growth – housing has a direct impact on economic output, averaging 3 per cent of GDP in the last decade. For every new home built up to two new jobs are created for a year"*.
- 8.13. The economic benefits are to be accorded **substantial weight** in the planning balance.

Social

- 8.14. The Appeal Scheme more than satisfies the social role, in helping to support strong, vibrant, and healthy communities, including through providing the supply of housing required to meet identified needs in open market and affordable sectors. This is a very substantial benefit. In addition:
- 1) Future residents will be in an easy walking, cycling or public transportation distance to local and higher order services and facilities in Arborfield Cross, Arborfield Green, Wokingham and Reading
 - 2) The Appeal Scheme will provide a range of housing types and sizes, including up to 111 dwellings to address identified housing needs including 44 affordable dwellings (40%)
 - 3) The Appeal Scheme will secure a high quality form of development consistent with the development management policies of the NPPF and the approach to high quality design set out in the NPPF; and
 - 4) Publicly accessible open space will be provided on the Appeal Site.
- 8.15. The details of the layout and house type design are to be agreed through the determination of a subsequent reserved matters application, with the detailed scheme to reflect the particular need for housing at that time.

- 8.16. Overall, the social benefits of the scheme can be afforded **substantial weight** in the overall planning balance.

Environmental

- 8.17. In terms of the environmental role, the Appeal Site is not located on land designated for its landscape value.
- 8.18. The Appeal Scheme will not have any material impact on existing ecology and will in fact lead to an overall biodiversity net gain through securing off-site enhancements.
- 8.19. The proposals would deliver sustainable homes allowing the fulfilment of this important objective whilst at the same time moving to a low carbon economy and securing an environmentally sustainable form of new residential development, with the Scheme securing an overall 10+% biodiversity net gain (to be refined at reserved matters stage).
- 8.20. On the basis of the above, there are environmental benefits which would arise from the proposals, to which, on balance, moderate positive weight should be attached in the overall planning balance.

Overall position on benefits

- 8.21. Overall, the benefits of the Appeal Scheme should be accorded **substantial weight**.

Overall Planning Balance

- 8.22. There is no “strong reason” for refusing the Appeal Scheme under paragraph 11(d)(i) to the NPPF. It is therefore necessary to turn to the tilted balance under paragraph 11(d)(ii).
- 8.23. The identified landscape and visual harms are only of **moderate** weight and the loss of 0.7ha of BMV attracts only **very limited weight**. The conflict with

the spatial strategy attracts **limited** weight. By contrast the package of benefits attract **substantial** weight.

- 8.24. Applying this test, the identified adverse impacts of granting planning permission would not significantly and demonstrably outweigh the benefits when assessed against the policies in the NPPF taken as a whole (quite the opposite). As such, the Appeal Scheme benefits from the presumption in favour of sustainable development and the grant of permission is justified.

APPENDIX BT1 – Ecology Statement



Dandara Southern Ltd & Elstree Land

20th October 2025

Our ref: SWE25/0078/L1

**LAND AT READING ROAD, ARBORFIELD
- OFF-SITE PEDESTRIAN IMPROVEMENTS**

Dear Sirs,

I write pursuant to the proposal to enhance the off-site pedestrian link located to the south of the above proposed development, as shown on the drawings prepared by Milestone Transport Planning Ltd. In order to assess the likely ecological impact of this proposal, I visited the site on 7th October so the habitats affected could be categorised and assessed.

It is understood that the existing hedgerows and trees will be retained. As such, the only habitats directly affected are the existing road and footpath, and a narrow verge of modified grassland. The latter contains grasses such as common bent *Agrostis capillaris*, Yorkshire fog *Holcus lanatus*, barren brome *Bromus sterilis* and false oatgrass *Arrhenatherum elatius*, with the herb component comprising a typical mix of ubiquitous species such as dove's foot cranesbill *Geranium molle*, creeping buttercup *Ranunculus repens*, cow parsley *Anthriscus sylvestris*, dandelion *Taraxacum officinale*, daisy *Bellis perennis*, yarrow *Achillea millefolium* and nipplewort *Lapsana communis*.

Based on the results detailed above, the proposed improvements to the pedestrian link would only impact common habitats types that have limited intrinsic ecological value and which are readily created. As such, their removal to facilitate the improvement work is assessed as unlikely to have a significant direct ecological impact at anything above the confirms of the works itself. Furthermore, none of the habitats is likely to support resident protected or notable fauna, and so there is minimal risk of direct impacts on such species. Similarly, if any lighting required to be installed as part of the improvement is designed in line with current best practice, as outlined in the Institution of Lighting Professionals' Guidance note 08/23 – *Bats and artificial lighting at night*, there is also unlikely to be a significant indirect impact on fauna, such as bats.

I hope this is of assistance and please do not hesitate to contact me to discuss anything further if necessary.

Best regards

Sam Watson MCIEEM
Director

APPENDIX BT2 – Extract of Environment Agency Flood Risk Map for Planning

