

Planning Statement

June 2026

**Applicant:**

Mr James and Mr Joshua Frankham

Address:

Land at Leafields
Great Lea
Pingewood
Three Mile Cross
Wokingham
RG7 1NP

E: 471058 N: 168481

Proposal:

The material change of use of agricultural land to a mixed use of agricultural land and a residential caravan site consisting of two static caravans, 1 day room parking for 4 cars, the associated operational development to facilitate the change of use, together with landscaping, the site to be occupied by Gypsies and Travellers.



Document Name	Ref (if any)	Page number
Planning Statement	PD1	
Location Plan	PD2	
Proposed Block Plan	PD3	
Proposed Block Plan - Visibility Splay	PD4	
Block Plan with Flood data overlay	PD5	
Day Room Plans	PD6	
eBike Storage Charging detail	PD7	
eBike Storage Plan	PD8	
Refuse Storage	PD9	
Bio Diversity Net Gain Report	PD10	
BNG Metric	PD11 & 11a	
Preliminary Ecological Impact Assessment	PD12	
Sustainable Drainage Assessment	PD13	
Flood Risk Assessment	PD14	
AWE Nuclear Fallout Mitigation and Technical Note	PD15	
Personal Circumstances CONFIDENTIAL	PD16	
Judical Judgements - Alternative & Available	PD17	
Waverley Judgement	PD18	
Chapman Judgement	PD19	
Sustainability Appeal Decisions Holistic Approach	PD20	
WBC GTAA 2023	PD21	
WBC G & T - Topic Paper 5 Year Supply Position	PD22	
Landscaping Statement	PD23	
Built Form Calculation	PD24	
Community Involvement Statement	PD25	
Caravan Elevations Statement	PD26	
Vicious Cycle Document - Equality Commission	PD27	

Site Description

The application site is located beyond the settlement boundary in a rural location and sits adjacent to the road Great Lea which is closely related to the A33 and the settlement of Three Mile Cross to the east, whilst the M4 is a short distance to the north.

The land use is agricultural although it is of limited size and quality not deemed suitable for economic farming practices and is nestled between existing residential development, being Lea Fields House, Lea Farm House and Hartley Court Farm Cottage, whilst directly opposite are the cottages known as 1-9 Great Lea.

The surrounding area follows a consistent pattern of sporadic development of residential properties adjacent to the roadside, together with farmsteads within wider open countryside and there is also a significant residential caravan park nearby together with the Park and Ride for England largest Town, Reading.



Planning History

Ref: 241057 -

Erection of 4 dwellings and associated parking and landscaping

Refused

Reasons

1. The proposal represents inappropriate unplanned development outside of and unconnected to any development limits within the countryside and contrary to the spatial objectives of the development plan and to policies CP1, CP3, CP6, CP9, CP11 and CP17 of the Core Strategy, Policies CC01, CC02, CC03 and TB21 of the MDD Local Plan, the Borough Design Guide SPD and sections 2, 4, 12 and 15 of the National Planning Policy Framework.
2. The application site is within an unsustainable location that would not encourage a modal shift towards sustainable modes of transport and the occupiers would be reliant on private motor vehicles for basic day-to-day needs, by reason of the countryside location outside of settlement limits, distances to facilities and services, limited public transport links and poor quality of the walking/cycling 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 National Planning Policy Framework.
3. The proposed development will have a negative and detrimental impact on the landscape and character & appearance of the area by the loss of undeveloped open grassland in the countryside which eliminates the green gap between the existing development to the south and north and results in a urbanising development out of keeping with the rural character of the road, contrary to policies CP1, CP3 and CP11 of the Core Strategy, Policies CC01, CC02, CC03 and TB21 of the MDD Local Plan, the Borough Design Guide SPD, the Wokingham District Landscape Character Assessment and sections 12 and 15 of the National Planning Policy Framework.
4. The proposed development involves the construction of 'More Vulnerable' development in Flood Zone 3. In the absence of adequate mitigation measures, the proposals would result in adverse flooding and surface water drainage impacts onto both the occupants of the site and neighbouring residential sites. The proposals are therefore contrary Policy CP1 and CP3 of the Core Strategy, Policies CC09 and CC10 of the MDD Local Plan and section 14 of the National Planning Policy Framework.
5. The application site is located within the Urgent Protection Actions Area of the Detailed Emergency Planning Zone (DEPZ) for the Atomic Weapons Establishment, Burghfield. It has not been adequately demonstrated that the location of the proposed development can be safely accommodated having regard to the needs of Blue light services and the emergency off site plan for the AWE at Burghfield, contrary to Policy TB04 of the MDD Local Plan 2014.
6. Insufficient information has been submitted to enable the implications of the development to be fully assessed with respect to parking, turning, and visibility for motor vehicles. The proposals are therefore contrary to policies CP1 and CP6 of the Core Strategy and section 9 of the National Planning Policy Framework.
7. In the absence of adequate mitigation and monitoring measures, the proposals fail to demonstrate how the development would not have a harmful impact on biodiversity by reason of the development of previously undeveloped open grassland and the site's proximity to Great Lea Pond, a designated Local Wildlife site. Additionally, the proposal has failed to demonstrate how a biodiversity net gain would be achieved and secured in perpetuity (on or off the site). As such, in its current form the proposal would have detrimental impact on the biodiversity of the area contrary to policies CP7 of the Core Strategy, TB23 of MDD Local Plan and the National Planning Policy Framework.

Ref: 970338 -

Outline Application for the erection of 3 dwellings

Refused

Ref: 232464 -

Permission in principle application for a residential development consisting of a minimum of 2 maximum of 4 dwellings

Withdrawn

Planning Constraints

Contaminated Land Consultation Zone
Flood Zones 2 and 3
Affordable Housing Thresholds
Bat Roost Habitat Suitability
Scale and Location of Development Proposals – **Countryside (CP11)**
Great Crested Newt Consultation Zone – **Red Risk Zone**
Ground Water Zones
Nuclear Consultation Zone – **Urgent Planning Area within the Detailed
Emergency Planning Zone (DEPZ) for AWE Burghfield**
Landscape Character Assessment Area
SSSI Impact Risk Zones
Thames Basin Heaths SPA Mitigation Zones – **7km Linear Mitigation Zone**
Local Wildlife Sites Consultation Zone
JCEB Areas of Search for Sand and Gravel
JCEB Mineral Safeguarding Areas

Wokingham Borough Council Local Plan Policy

Policy TB10: Traveller Sites

1. Planning permission may be granted for new gypsy and traveller pitches or travelling showpeople plots or extensions to existing sites where it can be demonstrated that:
 - a) The site is located in the Borough's existing settlements or is adjacent to an existing settlement either within or adjacent to the Borough
 - b) Avoids impacting on the separate identity of settlements
 - c) The site has access to a range of local services such as shops; health facilities including doctors, schools, and a range of amenities including play areas and other recreation facilities
 - d) No significant barriers to development exists in terms of flooding, poor drainage, poor ground stability or proximity to other hazardous land or installations where conventional housing would not be suitable
 - e) Unacceptable impacts on the character and appearance of the surrounding landscape will be minimised through the sensitive and appropriate design of the scheme
 - f) The proposals will not result in an unacceptable loss of amenity of neighbouring land uses
 - g) Mixed use proposals (which are sites that include a business use) will only be considered if appropriate to the locality and such uses will not result in an unacceptable loss of amenity
 - h) The scheme avoids any adverse impacts on the Special Protection Area.

Applicant Occupants

The applicant family are well known local family from the English Traveller community who have well established and longstanding ties with the area and whose relatives presently live on the nearby residential caravan park.

I am able to confirm that they are all Gypsies or Travellers as defined within the Annexe 1 of the 2024 PPTS.

PPTS Annexe 1

1. For the purposes of this planning policy “gypsies and travellers” means:
Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily or permanently, and all other persons with a cultural tradition of nomadism or of living in a caravan, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.

This follows the High Court ruling in the judgement of the Lisa Smith Case No: CA-2021-001741 (Judgement submitted in full), this will be discussed further later in this document.

Personal Circumstances

This application is supported by a confidential document containing personal information that if needed, is to be considered for a case of Very Special Circumstances within the final planning balance. **Document Submission Ref: PD16**

It is recognised that the site is not located within the Green Belt and this data is not required to make the case of VSC against inappropriate development in the Green Belt.

Alternative & Available Pitches

The applicants confirm that they have been unable to find alternative or available pitches, or for that matter, any land with greater or better potential than the application site.

In the event that the application is refused, then a roadside existence is the only alternative open to the applicant family members.

The application is accompanied by a number of Judicial Decisions and case law which sets how the Courts deal with this. I shall address those in greater detail, but initially the **Document Submission Ref: PD17** contains relevant documents.

Waverley Borough Council Judgement Document Ref: PD18

I submit the full Judgement by the High Court Judge (former Planning Inspector) Karen Ridge Ref: QB: 2021-002721

She looked closely at the point regarding an oversupply of sites compared to GTAA numbers, at alternative consented sites and discussed them in her Judgement at Para 41 & Para 92-95.

41. The difficulties in obtaining a permanent pitch are set out by various defendants and I accept that is a particular difficulty of the Gypsy and Traveller community generally. Some defendants have contested the claimant's suggestion that pitches on the Lydia Park sites may be available. I understand these to be private sites, in the hands of individuals and it is to be expected that those individuals would want to keep any empty pitches for use by their own families. I conclude that it is unlikely that private pitches held by other unconnected individuals would be available to any of the defendants as alternative sites. That conclusion is one which Inspector Gilbert came to in the appeal at Stovolds Hill in August 2022, when dismissing the appeal, she concluded that this lack of suitable and alternative sites attracted significant weight.

92. The question of the availability of alternatives was raised by both parties. There are no available council pitches. The claimant suggests that sufficient provision of sites has been made and that there are spare pitches on Lydia Park. I accept that empty pitches on Lydia Park are in the hands of private individuals who will seek to cater for their own families. That was also the conclusion of Inspector Gilbert.

93. It is also instructive that the council officer, in refusing planning permission on the land did so on the basis that the Council could demonstrate a 5-year supply of pitches and that "the large number of pitches recently granted at Lydia Park itself, which gives the applicants options for alternative accommodation". This again points to the mindset of the local authority throughout their decision-making processes, they believed the defendants had somewhere else to go and a precarious roadside existence was not likely in the event of a final injunction.

94. Mr Beglan suggests that the onus of proof on the non-availability of alternative sites rests with the defendants. It is difficult of course to prove a negative. Other than the empty pitches on Lydia Park, the claimants are unable to point to any other available pitches. Some of the defendants have made enquiries of the claimant regarding the availability of pitches but to no avail. The defendants initially on the site moved off but subsequently moved back on to the Land when other options and the goodwill of family members and friends had been exhausted. I conclude that there are no other alternative sites available to these defendants in the event that they were required to leave the Land.

95. A roadside existence for these families, with all of its attendant difficulties would be the most likely consequence of final injunctive relief. That would lead to significant hardship for these families given their particular circumstances and healthcare needs.

This passage from the Judicial judgement as submitted, should serve to guide Council planning officers and appeal inspectors when considering GTAA unmet needs or consented sites that meet the need more accurately as taken by the Judiciary.

It is clear that the Judge understands quite rightly, that just because a site has been passed elsewhere, it does not mean that it is available or that there is no longer a need for the applicants to have a home and that roadside living would not be required.

Chapman v United Kingdom Document Ref: PD19

I submit the judgement in Chapman V United Kingdom 2001 Alternative Sites Must Be *Practical* and *Realistic*

The Court said that it wasn't just about whether **any sites exist**—it's about whether they're actually **available**, **suitable**, and **accessible** to the person involved.

"The availability of alternative accommodation is relevant to assessing the proportionality of the interference with Article 8 rights."

So if no **real** alternatives are available, forcing someone to leave may be **disproportionate** and unjustified.

European Court Human Rights

Article 8

Right to Private and Family Life - protects a traveller's way of life including their right to live in a mobile home or caravan and it follows that Authorities must consider the best interests of the Children in housing and family decisions

Article 14

Prohibition of Discrimination - Prevents discrimination based on ethnicity, lifestyle or age

Article 2

Right to Education - The children wish to access school and this article protects access to education

Article 3

Rights of Child - The CRC (ratified by all EU member states) defines the "best interests of the child" in **Article 3**, stating:

"In all actions concerning children, whether undertaken by public or private social welfare institutions, courts of law, administrative authorities, or legislative bodies, the best interests of the child shall be a primary consideration."

This applies to:

- **Family Law:** Custody disputes, adoption, foster care.
- **Education:** Equal access, non-discrimination (e.g., Roma children's schooling rights).
- **Health & Welfare:** Access to healthcare, protection from neglect.
- **Immigration & Asylum:** Unaccompanied minors must receive special protection.

A Child cannot and must not be blamed or held to account for the actions or conduct of a parent and their rights should not be infringed as a result of the actions of their parents.

It is held that the Best Interests of the Child attract no less weight (positive) in the planning balance, than the most weight applied (negative) against the proposal.

National Planning Policy Framework (NPPF)

1. The National Planning Policy Framework sets out the Government's planning policies for England and how these should be applied¹. It provides a framework within which locally- prepared plans can provide for housing and other development in a sustainable manner. Preparing and maintaining up-to-date plans should be seen as a priority in meeting this objective.
2. Planning law requires that applications for planning permission be determined in accordance with the development plan², unless material considerations indicate otherwise³. The National Planning Policy Framework must be taken into account in preparing the development plan, and is a material consideration in planning decisions. Planning policies and decisions must also reflect relevant international obligations and statutory requirements.
3. The Framework should be read as a whole (including its footnotes and annexes). General references to planning policies in the Framework should be applied in a way that is appropriate to the type of plan being produced, taking into account policy on plan-making in chapter 3.
4. The Framework should be read in conjunction with the Government's planning policy for traveller sites, and its planning policy for waste. When preparing plans or making decisions on applications for these types of development, regard should also be had to the policies in this Framework, where relevant.

Achieving Sustainable Development

Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

- a) **an economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- b) **a social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- c) **an environmental objective** – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

And the NPPF goes on to set out at Para 10, that

10. So that sustainable development is pursued in a positive way, at the heart of the Framework is a **presumption in favour of sustainable development** (para 11)

Para 11(d) is engaged where a LPA are unable to demonstrate an up to date 5 year supply of deliverable sites (PPTS Section 28)

I shall explore the Councils 5 year position later in this document.

The presumption in favour of sustainable development

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

For **plan-making** this means that:

- a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;
- b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas⁶, unless:
 - i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area⁷; or
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

For **decision-taking** this means:

- c) approving development proposals that accord with an up-to-date development plan without delay; or
- d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date⁸, granting permission unless:
 - i. the application of policies in this Framework that protect areas or assets of particular importance⁷ provides a strong reason for refusing the development proposed; or
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination⁹.

Decision Making

39. Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible

The Government's direction of travel on wishing to bring forward development is echoed in both the PPTS and NPPF where they clearly introduce specific guidance and direction in relation to using planning conditions to bring forward otherwise unacceptable development.

Planning conditions and obligations

56. Local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.
57. Planning conditions should be kept to a minimum and only imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects. Agreeing conditions early making. Conditions that are required to be discharged before development commences should be avoided, unless there is a clear justification.

NB Para 28 of the PPTS is of note.

The desire for new housing to meet everyone's needs and the importance that Government attaches to this, is set out at Chapter 5, para 61 onwards of the NPPF;

Delivering a sufficient supply of homes

61. To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. The overall aim should be to meet an area's identified housing need, including with an appropriate mix of housing types for the local community.
62. To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance. In addition to the local housing need figure, 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

In regard to Rural Homes or countryside locations for new development, the Government attach importance to bringing forward development on previously developed land, and where it will provide homes to meet a specific need and where it can support a village to thrive.

Rural housing

82. In rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs, including proposals for community- led development for housing. Local planning authorities should support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs, and consider whether allowing some market housing on these sites would help to facilitate this.
83. To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.
84. Planning policies and decisions should avoid the development of isolated homes in the countryside unless one or more of the following circumstances apply:
- a) there is an essential need for a rural worker, including those taking majority control of a farm business, to live permanently at or near their place of work in the countryside;
 - b) the development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets;
 - c) the development would re-use redundant or disused buildings and enhance its immediate setting;
 - d) the development would involve the subdivision of an existing residential building; or
 - e) the design is of exceptional quality, in that it:
 - i. is truly outstanding, reflecting the highest standards in architecture, and would help to raise standards of design more generally in rural areas; and
 - ii. would significantly enhance its immediate setting, and be sensitive to the defining characteristics of the local area.

It is clear that homes in the countryside are acceptable and not excluded, by the use of the words “should avoid”, and the clear guidance within 84, a through e gives us general principle that makes such homes acceptable.

The specific characteristics of the individual site are relevant in the planning judgement and balance.

In Chapter 8, (promoting healthy and safe communities) the Government are clear in setting out that they see a benefit to society in bringing persons together that would not ordinarily interact, this can be of great significance in forging cohesion between the traveller and settled community, and the significant benefits it can bring society;

8. Promoting healthy and safe communities

96. Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:
- a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;

- b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas; and
- c) enable and support healthy lives, through both promoting good health and preventing ill-health, especially where this would address identified local health and well-being needs and reduce health inequalities between the most and least deprived communities – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.

In Chapter 9, the Government look at the promotion of sustainable transport, which is often a hot topic of debate within applications for Gypsy and Traveller sites, as a large number are located several miles or more from services and facilities. The document will deal with the sustainability of the site later within this document, however, it is important to set out clearly, that sustainable alternative modes of transport, are viewed in a more holistic approach and manner by Planning Inspectors when dealing with appeals for Gypsy and Traveller sites.

9. Promoting sustainable transport

109. Transport issues should be considered from the earliest stages of plan-making and development proposals, using a vision-led approach to identify transport solutions that deliver well-designed, sustainable and popular places. This should involve:

- a) making transport considerations an important part of early engagement with local communities;
- b) ensuring patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places;
- c) understanding and addressing the potential impacts of development on transport networks;
- d) realising opportunities from existing or proposed transport infrastructure, and changing transport technology and usage – for example in relation to the scale, location or density of development that can be accommodated;
- e) identifying and pursuing opportunities to promote walking, cycling and public transport use; and
- f) identifying, assessing and taking into account the environmental impacts of traffic and transport infrastructure – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains.

We once again see the Governments clear direction of travel in attempting to bring forward development and remove as many obstacles to consent as is possible at Para 116;

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

In Chapter 11 the NPPF sets out guidance on making effective use of land at Para 125, c) & d) looks at using land that has a use already,

125. Planning policies and decisions should:

c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;

d) promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure)

At Chapter 15, we see guidance in relation to National Parks, which is of particular relevance to this planning proposal;

15. Conserving and enhancing the natural environment

188. Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework⁶⁵; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.

189. Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and National Landscapes which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broad⁶⁶. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas

At Para 90, we see the Government is keen to restrict Major Development within these protected areas, however the site proposal is for a minor development,

190. When considering applications for development within National Parks, the Broads and National Landscapes, permission should be refused for major developments⁶⁷ other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:

In Annexe 2 Glossary, the Government set out clarification on specific wording used within the NPPF and generally within planning matters;

Deliverable: To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

(The Court case judgement in Chapman sets out the definition of deliverable)

a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.

There are also a number of Judicial High Court Judgements that deal with this topic, and this is of particular relevance to the development of Gypsy and Traveller sites, when assessing the GTAA and availability of other sites, where LPAs often try to assert that the applicants have failed to demonstrate that no other sites are available, which of course is rather difficult, as proving a negative is almost impossible.

Sustainable transport modes: Any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, ultra low and zero emission vehicles, car sharing and public transport.

Windfall sites: Sites not specifically identified in the development plan.

It is clear, that the Government in revising the NPPF in December 2024, combined with the many ministerial interviews and general press releases, has a vision to reduce the red tape and burdens upon applicants, in an attempt to bring forward development to meet all of societies needs.

This clear direction of travel will take effort and commitment from everybody, not least the Local Planning Authorities and residents near to the proposal sites.

Planning Policy for Traveller Sites (PPTS)

The PPTS is a separate planning document, to read in conjunction with the NPPF and it sets out specific matters in relation to Gypsy and Traveller site proposals.

3. The Government's overarching aim is to ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community.

The Revision of the PPTS definition of a Gypsy and Traveller following the Lisa Smith Judgement, ruling that the 2015 definition was discriminatory, has shown a clear intent on behalf of the Government.

4. To help achieve this, the Government's aims in respect of traveller sites are:

- a) that local planning authorities should make their own assessment of need for the purposes of planning;
- b) to ensure that local planning authorities, working collaboratively, develop fair and effective strategies to meet need through the identification of land for sites;
- c) to encourage local planning authorities to plan for sites over a reasonable timescale;
- d) that plan-making and decision-taking should protect Green Belt from inappropriate development;
- e) to promote more private traveller site provision while recognising that there will always be those travellers who cannot provide their own sites;
- f) that plan-making and decision-taking should aim to reduce the number of unauthorised developments and encampments and make enforcement more effective;
- g) for local planning authorities to ensure that their Local Plan includes fair, realistic and inclusive policies;
- h) to increase the number of traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply;
- i) to reduce tensions between settled and traveller communities in plan-making and planning decisions;
- j) to enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure; and
- k) for local planning authorities to have due regard to the protection of local amenity and local environment.

At Para 10, the Government stipulate the requirement upon the LPA in regards to their local plans:

10. Local planning authorities should, in producing their Local Plan:

- a) identify and update annually, a supply of specific deliverable sites sufficient to provide 5 years' worth of sites against their locally set targets;
- b) identify a supply of specific, developable sites, or broad locations for growth, for years 6 to 10 and, where possible, for years 11-15;
- c) consider production of joint development plans that set targets on a cross-authority basis, to provide more flexibility in identifying sites, particularly if a local planning authority has special or strict planning constraints across its area (local planning authorities have a duty to cooperate on planning issues that cross administrative boundaries);
- d) relate the number of pitches or plots to the circumstances of the specific size and location of the site and the surrounding population's size and density; and
- e) protect local amenity and environment.

At Para 11, the Government make it clear that where there is no identified need, criteria based policies should be used, this is set out in Policy SP33 as previously set out on page 15 of this document.

11. Criteria should be set to guide land supply allocations where there is identified need. Where there is no identified need, criteria-based policies should be included to provide a basis for decisions in case applications nevertheless come forward. Criteria based policies should be fair and should facilitate the traditional and nomadic life of travellers while respecting the interests of the settled community.

In recognising the benefits from a settled base, Para 13, looks at some key aspects,

13. Local planning authorities should ensure that traveller sites are sustainable economically, socially and environmentally. Local planning authorities should, therefore, ensure that their policies:

- a) promote peaceful and integrated co-existence between the site and the local community;
- b) promote, in collaboration with commissioners of health services, access to appropriate health services;
- c) ensure that children can attend school on a regular basis;
- d) provide a settled base that reduces both the need for long-distance travelling and possible environmental damage caused by unauthorised encampment;
- e) provide for proper consideration of the effect of local environmental quality (such as noise and air quality) on the health and well-being of any travellers that may locate there or on others as a result of new development;
- f) avoid placing undue pressure on local infrastructure and services;
- g) do not locate sites in areas at high risk of flooding, including functional floodplains, given the particular vulnerability of caravans; and
- h) reflect the extent to which traditional lifestyles (whereby some travellers live and work from the same location thereby omitting many travel to work journeys) can contribute to sustainability.

In relation to sites located in rural areas, Policy C clearly indicates that in principle sites are acceptable, so long as the scale is appropriate;

Policy C: Sites in rural areas and the countryside

14. When assessing the suitability of sites in rural or semi-rural settings, local planning authorities should ensure that the scale of such sites does not dominate the nearest settled community.

At Para 26 the guidance on countryside locations which are away from existing settlements, should be very strictly limited, and yet again this does not preclude such development. In the instance of this proposal, the application site is not located in open countryside away from existing settlements, as it is on the edge of the village of Burley and adjacent to existing residential buildings and land uses.

26. Local planning authorities should very strictly limit new traveller site development in open countryside that is away from existing settlements or outside areas allocated in the development plans. Local planning authorities should ensure that sites in rural areas respect the scale of, and do not dominate, the nearest settled community, and avoid placing an undue pressure on the local infrastructure.

And again at Para 28, we see that the Government gives clear instructions on the use of planning conditions to overcome objections to planning.

28. If a local planning authority cannot demonstrate an up-to-date 5 year supply of deliverable sites, the provisions in paragraph 11(d) of the National Planning Policy Framework apply. Local planning authorities should consider how they could overcome planning objections to particular proposals using planning conditions or planning obligations including:

In assessing the sites suitability in accordance with the relevant sections of the local plan policy, NPPF and PPTS, I will set out on the following pages, supporting material in relation to the applicant/s and the site itself.

Need Position

It is the responsibility of the LPA to demonstrate an up to date 5 year supply of deliverable sites as

28. If a local planning authority cannot demonstrate an up-to-date 5 year supply of deliverable sites, the provisions in paragraph 11(d) of the National Planning Policy Framework apply. Local planning authorities should consider how they could overcome planning objections to particular proposals using planning conditions or planning obligations including:

set out in Section 28 of the Planning Policy for traveller Sites (PPTS).

Deliverable - Judicial Judgement - East Northamptonshire Council v Secretary of State for Housing, Communities and Local Government 2020 - High Court Consent Order.

The accepted test is:
a site must be:

- available now,
- in a suitable location now, and
- achievable, with a realistic prospect that development will be delivered within five years.

I submit the Council's Gypsy and Travel Topic Paper as **Document Submission Ref: PD22** where at Page 22 we can see that the Council concludes it is currently able to demonstrate a 3.78 year

f) Annual monitoring requirement April 2024 to March 2029	8.2 ¹¹
g) Deliverable supply April 2024 to March 2029	31
h) Total deliverable housing supply in years for period April 2024 to March 2029	3.78 ¹²

5.4 At the point of publication of the Proposed Submission Plan the council is unable to demonstrate a 5 year supply of deliverable pitches against the locally set target in the Proposed Submission Plan, with the position standing at 3.78 years.

5.5 However, this is due to the timing that new pitches are expected to come forward. It is anticipated that at the point of adoption of the plan, a supply in excess of 5 years will be demonstrable and that this will be maintained moving forwards. Windfall developments will be capable of topping up and ensuring supply is maintained later in the plan period.

deliverable sites provision.

The Council's position is that it is currently unable to demonstrate an up to date 5 year supply of sites.

The presumption in favour of sustainable development

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

For **plan-making** this means that:

- a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;
- b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas⁶, unless:
 - i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area⁷; or
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

For **decision-taking** this means:

- c) approving development proposals that accord with an up-to-date development plan without delay; or
- d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date⁸, granting permission unless:
 - i. the application of policies in this Framework that protect areas or assets of particular importance⁷ provides a strong reason for refusing the development proposed; or
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination⁹.

⁶ As established through statements of common ground (see paragraph 28).

⁷ The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 189) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75); and areas at risk of flooding or coastal change.

⁸ This includes, for applications involving the provision of housing, situations where: the local planning authority cannot demonstrate a five year supply of deliverable housing sites (with the appropriate buffer as set out in paragraph 78); or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years. See also paragraph 227.

⁹ 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.

In light of this stated position, Para 11(d) The presumption in favour of sustainable development is engaged, this is often referred to as the so called 'Tilted Balance'.

Para 11(d) (i)(ii) Assessment

Footnote 7

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

For footnote 7 to block the use of Para 11d) under i. There would need to be ‘Strong’ reason for refusing development and under ii. ‘Demonstrably’ outweigh the benefits

How this plays out — two “families” of Footnote 7 policies

Practical experience (from appeal decisions and analysis) shows that not all Footnote 7 policies are equal in how strongly they carry refusal weight:

- **Policies with “in-policy full balance”:**
These are protections that already include a clear, policy-driven balancing exercise — e.g. Green Belt (“very special circumstances” test), major development in National Landscapes, or substantial harm/total loss to heritage assets. If a proposal fails those internal policy tests, that typically *will* amount to a strong reason for refusal. The “tilted balance” rarely applies because the internal test itself is decisive.
- **“Gateway” or procedural/threshold-type policies:**
These include tests like sequential (flood risk) tests, or “less than substantial harm” heritage balancing, or irreplaceable habitat protection. These policies raise a red flag but don’t themselves automatically tip the balance. Whether harm is “strong” enough depends on the real-world, site-specific consequences. In many cases, a conflict with a Footnote 7 policy under this group may be “significant” but not “strong enough” to refuse — so the “tilted balance” under 11(d)(ii) may still apply.

Application Site

The proposal represents a minor development and is not located within any of the protected sites, such as Habitat sites and those sites listed within Para 189 of the NPPF.

- 189 Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and National Landscapes which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads⁶⁰. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.

There are no STRONG reasons under Para 11d) (i) on which to refuse the development under The presumption in favour of sustainable development.

STRONG REASON to Refuse

NB: It should be noted that the AWE is not considered to be a footnote7 designation

Para 11(d)(ii) Assessment - Sustainability

Footnote 9

9 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.

Para 66 - The site is not a major development

Para 84 - The site is not an **isolated** site in the Countryside

Para 91 - This para is not relevant as it considers town centre uses

Para 110 - This proposal is not a significant development, but nevertheless the Appellants have shown that in addition to the wider benefits, there are realistic and viable alternative modes of transport.

Para 115 - It has been clearly evidenced that the site complies with a) through to d) of Para 115.

Para 129 - The proposal complies with Para 129, as it seeks to deliver the best use of the land to meet a local need, in an area that is not offended in terms of Character and Appearance as a result of the proposed development, which is well screened. The site complies with a) through to e) of Para 129.

Para 135 - There are no perceived or known conflicts with Para 135

Para 139 - There are no perceived or known conflicts with Para 139

Summary

There are no identified reasons that would significantly and demonstrably outweighs the benefits of granting permission and therefore Para 11(d) remains engaged.

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.

13. Local planning authorities should ensure that traveller sites are sustainable economically, socially and environmentally. Local planning authorities should, therefore, ensure that their policies:

- a) promote peaceful and integrated co-existence between the site and the local community;
- b) promote, in collaboration with commissioners of health services, access to appropriate health services;
- c) ensure that children can attend school on a regular basis;
- d) provide a settled base that reduces both the need for long-distance travelling and possible environmental damage caused by unauthorised encampment;
- e) provide for proper consideration of the effect of local environmental quality (such as noise and air quality) on the health and well-being of any travellers

I will now review the sites access to services and shops as part of the overall sustainability of the site.

It should be noted, that neither the NPPF of the PPTS sets out specific distances to and from shops and services from which to judge a sites sustainability credentials, we supply information to give an overview of the accessibility of the site, but this represents just one aspect of the sites sustainability.

Sustainability

The PPTS at section 13 sets out a number of benefits, both personal and national which are derived from providing a settled base to Gypsies and Travellers.

This section clearly recognises the importance in providing access to medical care and regular access to education, I shall set out evidence that clearly shows a pattern between a reduced education standard and the high proportion of uk prisoners being from the G&T community, together with national costs associated with illegal encampments and most recently the tensions between the settled community and the traveller community from illegal encampments, where the G&T feel they have no alternative but to move onto land without permission because of the lack of available sites.

Appeal Decision

Hearing held on 22 October 2025 (in person) & 23 October 2025 (online)

Site visit made on 22 October 2025

by Jane Smith MA MA MRTPI

an Inspector appointed by the Secretary of State

Decision date: 18th November 2025

Appeal Ref: APP/P0240/W/25/3368820

**The Plough House, 276 London Road, Biggleswade, Central Bedfordshire
SG18 9TB**

- The appeal is made under section 78 of the Town and Country Planning Act 1990 (as amended) against a refusal to grant planning permission.
- The appeal is made by Mr A Connors against the decision of Central Bedfordshire Council.
- The application Ref is CB/25/00305/FULL.
- The development is described as 'Demolition of 2 existing buildings and removal of pre-existing mobile home. Erection of acoustic sound barrier fence. Change of use of land for the creation of 4 Gypsy/Traveller Pitches, comprising the siting of 4 static caravans (net 3) and 4 touring caravans alongside the erection of 1 combined dormer for use by family members (Red Retroactive)'

Location

9. The site is around 2km outside Biggleswade and not within any settlement envelope defined in the Central Bedfordshire Local Plan 2021 (CBLP). Biggleswade is defined as a major service centre in the CBLP and provides an extensive range of services and facilities in and around the town centre, including primary and secondary schools, GP and dental services, and public transport to settlements further afield. There is a sizable retail park on the southern edge of the town, which is readily accessible from the A1 and provides both convenience and comparison shopping. There is also a filling station slightly closer to the appeal site, with a small convenience store.

10. The site is directly accessible only via the northbound carriageway, with access to and from the southbound carriageway being more circuitous. This major strategic route carries fast-flowing traffic and lacks pavements, bus services or dedicated cycle facilities. When the highway conditions are taken into account, travel by car is highly likely to be the norm.

11. In the CBLP, Policy SP7 sets out the general approach to windfall development outside settlement envelopes, which includes some qualified support for redevelopment of PDL. Policy BSP1 in the Biggleswade Neighbourhood Plan 2022 (BNP) directs growth predominantly towards the town centre and built-up areas. Neither policy mentions Gypsy and Traveller development, which is more specifically covered by Policy H7 of the CBLP. That sets out several criteria, which include that adequate schools, shops, healthcare, and other community facilities are within reasonable travelling distance. The supporting text states that what constitutes a reasonable travelling distance will vary in relation to location of the site and services, and the local pattern of development.

12. The Planning Policy for Traveller Sites (PPTS) does not preclude Traveller development in the countryside, but paragraph 26 states that new sites in open countryside that is away from existing settlements should be very strictly limited. The supporting text to Policy H7 similarly recognises that Gypsy and Traveller families may prefer to live in the countryside on privately owned and managed sites, while also making clear that the policy aims to direct development toward sites which are closer to existing settlements.

13. There is some tension between Policies SP7 and H7, which include different accessibility requirements. Policy SP7 supports redevelopment of PDL only where the site is, or can be made, accessible to nearby services and facilities by sustainable modes of transport. Policies BTM1 and BPD1 of the BNP likewise require that a balanced and sustainable range of transport options is provided, proportionate to the scale and nature of the scheme and

I will also provide a selection of appeal decision which show the rather more holistic approach taken by Inspectors when judging alternative transport options, access and distances to services.

Of particular interest and of note, is the appeal decision that White Planning were involved in at The Plough House, whereby the site was adjacent to the busy A1 Dual Carriageway with no option other to access the services by private car.

Submission Document Ref: PD20

connecting to existing pedestrian or cycle infrastructure. In contrast, Policy H7 refers only to a reasonable travelling distance, with no reference to modes of transport.

14. The approach in Policy H7 is more closely aligned to the criteria in paragraph 13 of the PPTS, which defines sustainable Traveller sites for plan-making purposes in terms of providing access to school and health services from a settled base, without specifying whether that should include the ability to travel by means other than the private car. In turn, neither Policy SP7 nor the relevant policies in the BNP specifically preclude Traveller sites outside settlement boundaries, being silent in relation to that form of development.

15. The site is well connected to Biggleswade via the A1. The settlement is not visible, but it can be quickly accessed by car. As well as Plough House, there are several other developed sites strung sporadically along the A1. There are also open fields to either side of the road, and the site is in an area defined as countryside in the CBLP. Nevertheless, the roadside development and the major road itself limit the degree to which the appeal site is perceived as being in 'open countryside' or away from the settlement. The retail park on the edge of Biggleswade is very easily accessed by car and the journey is not time-consuming. The town centre is a relatively short distance beyond that, and the settlement as a whole provides the majority of services and facilities required for day to day living. While the southbound return route is slightly longer, it is not substantially more inconvenient.

16. The approach to sustainable development in the PPTS reflects the fact that those adopting a nomadic lifestyle are inherently reliant on travel by private motor vehicle, but that they require a settled base from which to access essential services. That approach continues to be articulated in the December 2024 version of the PPTS, notwithstanding the most recent changes to Annex 1.

17. The site would provide a settled base as described in the PPTS, within a reasonable travel distance of essential services, when the nature of the road network and travel time are taken into account. While paragraph 115 of the Framework requires that sustainable transport modes are prioritised, it also says that account should be taken of the type of development and its location. Therefore, the approach taken in the PPTS to the sustainable location of Gypsy and Traveller sites is more pertinent in this case.

18. The Council argues that other villages and towns would provide a better standard of accessibility and that other Gypsy and Traveller sites in the District are closer to settlements. Be that as it may, it is common ground between the parties that there are no alternative sites available to the proposed occupiers, and this appeal must be determined based on the merits of this particular location.

19. While I have considered the Lower Caldecote decision¹ highlighted by the Council, the Inspector's reasoning in that case focussed on the more limited range of services in Upper Caldecote and did not refer to the larger range of services in Biggleswade. Although the site may have had a similar relationship with the town centre, it was on the other side of the town, so did not have a similar relationship with the nearby retail park. The decision also mentions that previous appeal decisions on and near the Lower Caldecote site had taken a different view. Taking those factors into consideration, I have given the Inspector's conclusions in that case limited weight.

Other Matters

40. The PPTS states that local planning authorities should very strictly limit new traveller site development in the open countryside that is 'away from' existing settlements or outside areas allocated in the development plan. Despite the parties seeming to agree that the appeal site is broadly in an edge of settlement location, in relation to Wickford a little way to the north, the Council later said at the Hearing that it did not accept the site as being in a sustainable location, also that it considered the site to be isolated.

41. I note that the sustainability of the location was not given as a reason for the Council issuing the notice. I set out earlier in my decision that I considered the site to be relatively near to residential properties on established plotlands. I concur with the view that the site should be regarded as being located on the edge of, rather than away from, a settlement and not in an isolated location.

42. In terms of access to services and facilities, the appellants referred to the proximity of a shop, regularly used by the site occupiers, associated with a nearby petrol filling station on the A127 road to the west. The Council did not consider that this merited weight in view of the limited range of convenience goods that would be on offer.

43. Having visited the shop, which is likely to be within reasonable walking distance for most people, it seems to me that it would be equipped to cater for a variety of day-to-day food needs. A sustainable travel option would therefore be available to a degree. I am in no doubt, however, that it would be necessary to travel to Wickford in order to access a full range of services and facilities. It would be realistic to conclude that for reasons of convenience, distance and safety during hours of darkness there would be significant reliance on the private car in order to get to and from Wickford.

44. However, the Framework acknowledges that opportunities to maximise sustainable transport solutions will vary between urban and rural areas. Despite the likelihood of a very high degree of reliance on the private car, it seems to me that the length and duration of journeys necessary to access essential services and facilities **would be relatively moderate for a rural location**. There is also the potential for the **various pitch users to make shared trips**. The overall distances that would need to be travelled in order to access a range and choice of services are likely to be limited for these reasons. I consider that this weighs in favour of the conclusion that the appeal site should be regarded as in a relatively sustainable location.

The Inspector at 44 of their report, sets out the very sensible and appropriate approach to assessing the difference between urban and rural areas when it comes to answering the question of sustainable access to goods and services as well as recognising the opportunity to share trips.

It is unknown if this location had the benefit of a delivery service, but the appellants site does as evidenced, and would greatly reduce the need to use the private vehicle to access goods.

20. For the above reasons, I conclude that the development is suitably located having regard to relevant policies in the development plan and access to services and facilities. While it does not gain support from Policy SP7 or the relevant BNP policies, due to the level of reliance on private motor vehicles, it does accord with the locational criterion in Policy H7. Since that is the more relevant policy for Gypsy and Traveller development, the location accords with the development plan when read as a whole. It also accords with relevant criteria for sustainable Gypsy and Traveller development in the PPTS and does not conflict with the approach of exercising very strict control over new sites in open countryside and away from settlements.

Sustainability of the appeal site.

60. The sustainability of the appeal site is accepted by the Council. In general terms, I concur with that assessment **although the PPTS does not specifically refer to accessibility to services and facilities by foot and public transport as an aim. I therefore consider that the term 'accessibility' is more appropriate in this context.**

61. Paragraphs 14 and 25 the PPTS implicitly accept that traveller sites may be located in rural areas when this will lessen opportunities for sustainable travel. The accessibility criteria set out for traveller sites in **paragraph 13 of the PPTS do not include distance from or means of transport to shops and services**, but do refer to considerations which are unique to traveller site applications: for example, the provision of **a settled base can reduce the need for long distance travelling and that traditional lifestyles**, whereby some travellers live and work from the same location, can omit travel to work journeys and **contribute to sustainability.**

62. In general terms, the criteria set out in the PPTS apply to the appellant and his family. It is, however, still necessary to consider the site-specific factors and how they relate to the personal circumstances of the appellant and his family. In that context, whilst there a convenience store located a short distance from the appeal site, much of Kiln Lane is unmade and lacks street lighting. There would therefore be occasions when accessing that facility on foot would be difficult and/or an unattractive proposition. The school attended by Mr McDonagh's children is some distance away, as is the church that the family regularly attend. Attendance at both requires the use of a car. Other facilities are within 1 kilometre but equally require the use of a car, albeit the journey is relatively short.

63. Consequently, whilst the site is in a sustainable location, occupation of it does require use of a car for some if not most of day-to-day activities. Accordingly, the sustainable location of the appeal site is qualified and for that reason only attracts moderate weight in support of the development.

The Inspector sets out and 'qualifies' the approach taken to fully assess the basis of sustainable within the context of the PPTS, Para 13.

APP/X0415/C/20/3255353 Lodge Lane, Little Chalfont, Buckinghamshire

Access to shops and services

35. The appellants cite the proximity of the site to Little Chalfont and Chorleywood which in their view results in the site being in a reasonably sustainable location. Whilst they have not referred to the nature of the shops and services the Council has done so.

36. Policy CS4 of the Core Strategy seeks to ensure that new development has regard to sustainable development principles including being in locations which are easily accessible by public transport, walking and cycling. Access to Little Chalfont and Chorleywood by foot or cycle would be via, at least in part, unlit roads with no pavements, which would not make these forms of transport attractive particularly for less mobile people and young children. There is no evidence before me of the accessibility of bus services serving the site and surrounding villages. It follows that new development in this location does not accord with Policy CS4.

37. The appellants refer to an appeal decision relating to a site in Little Hadham (Appeal Ref. APP/J1915/W/19/3234671) (the Little Hadham appeal). They reflect on the Inspector's conclusions in that case which they have taken to be that the same sustainability criteria that is applied to the settled population should not be applied to gypsies and travellers. I concur with that approach given that the more general aim in the PPTS is the provision of suitable accommodation from which travellers can access education, welfare and employment infrastructure.

38. The Inspector in the Little Hadham case also referred to relevant national policy in the form of the National Planning Policy Framework, which although now replaced by the revised Framework still sets out that the opportunities to maximise sustainable transport will vary between urban and rural areas.

39. The Council argues that the distances to shops and services were shorter in the Little Hadham appeal. However, on the basis of the evidence before me access to such facilities by the residents of the appeal site would involve trips of a short duration. Such trips would be comparable to those undertaken by the settled population in a rural area and would render the site a suitable location from which travellers could access necessary facilities.

40. I conclude that the site is not in a location that is easily accessible by public transport, walking and cycling and hence the development fails to comply with a principle identified by Policy CS4. However, taking account of the PPTS and the Framework, which are both material considerations, I do not find that the limitations on the accessibility of shops and services in this case render the site unsuitable as a gypsy and traveller site.

For the purposes of completeness, the full report in the referenced appeal (Appeal Ref. APP/ J1915/W/ 19/3234671) (the Little Hadham appeal), is also submitted.

The report deals with sustainable location on page 3, Para 12 through 22.

It clearly sets out the different approach to sustainable locations afforded to Gypsy and Traveller lifestyles and the offset benefits to providing a settled base.

The application site is located in the countryside beyond the settlement boundary, however it is closely related to the existing pattern of residential development.

The Government set out in Section 14 of the PPTS that sites in countryside locations are acceptable but that they should not over dominate the nearest settled community.

Policy C: Sites in rural areas and the countryside

14. When assessing the suitability of sites in rural or semi-rural settings, local planning authorities should ensure that the scale of such sites does not dominate the nearest settled community.

Section 26 directs that restrictions to new sites which are isolated or away from existing settlements should be applied, but in this instance, the application site is not isolated or away from the existing settlement.

26. Local planning authorities should very strictly limit new traveller site development in open countryside that is away from existing settlements or outside areas allocated in the development plan⁹. Local planning authorities should ensure that sites in rural areas respect the scale of, and do not dominate, the nearest settled community, and avoid placing an undue pressure on the local infrastructure.

110. 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.

Holistic Approach

Para 110 of the National Planning Policy Framework sets out that the approach to assessing levels of access to sustainable transport options should recognise the differences that exists between rural and urban areas.

The application site is considered to qualify as a rural locality.

It is worthy to note that when it comes to sustainability, and access to shops and services, there



are
no firm assessments involving distances, where I supply distances, it is only as a guide to assist

Walking/Cycle Provision

The proposal introduces a pedestrian gate further south of the site than the vehicular access, on the Eastern boundary, which will connect the site occupant directly to the designated pedestrian footpath on Great Lea.

The speed limit (signed) of 40mph, the generous road width and geometry of the road allows for slower traffic and greater motorist awareness when approaching this pedestrian crossing point as well as the vehicular access.

Different views from the proposed pedestrian access, and their associated provisions are shown below. It is clear that the road facilities are in good condition and the proposed access point will provide safe, reliable travel for those using the route by foot and/or bicycle, as well as car from the access north of this point.

Looking North from the proposed pedestrian gate

Visibility is great and any cars approaching from the north would be forced to slow as they approach the bend around 50-55m away.



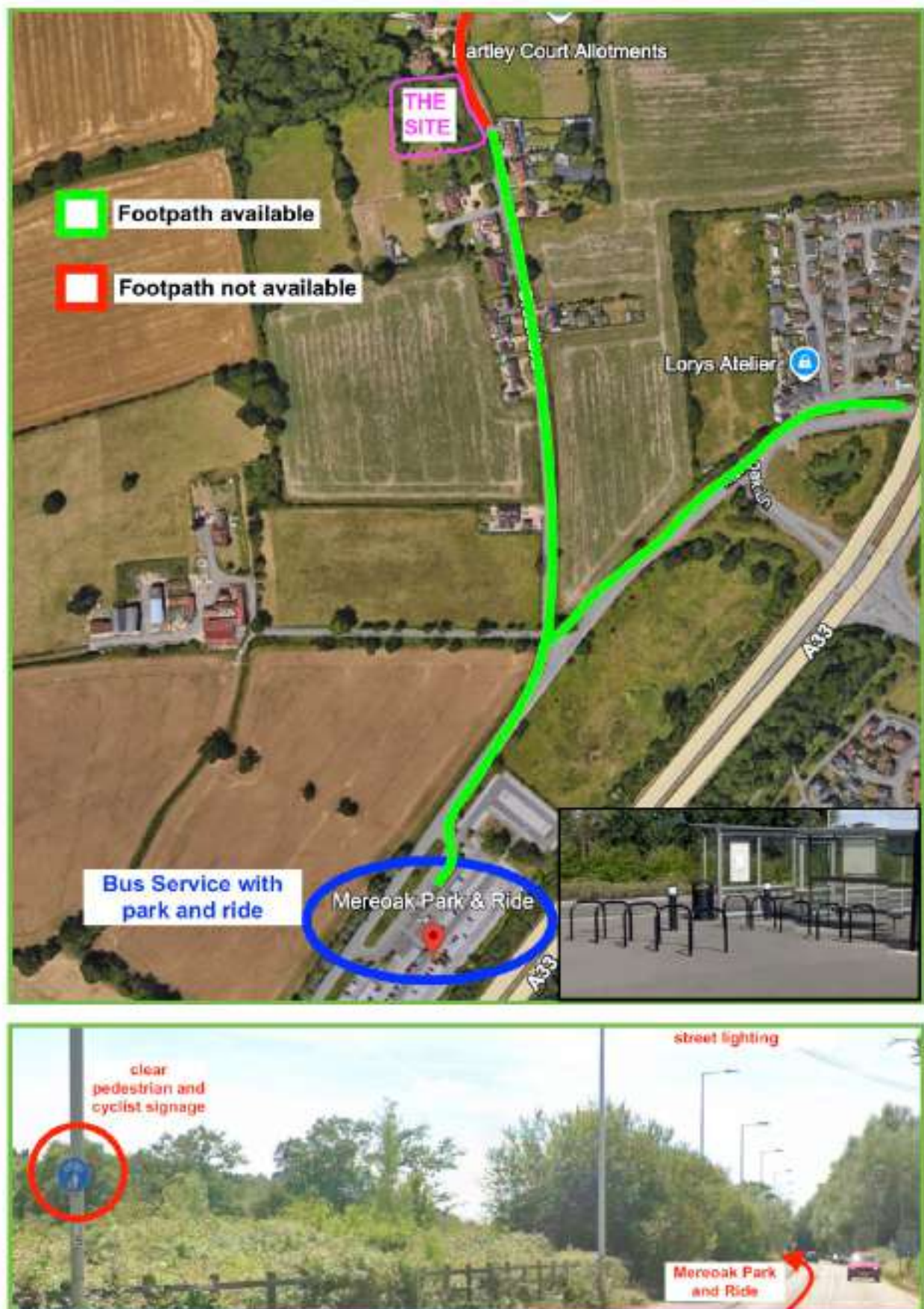
Looking South from the proposed pedestrian gate

Visibility is great and any cars approaching from the South would be forced to slow as they approach the bend found around 30m away at the vehicular access. The straight nature allows for greater motorist awareness, as well as pedestrians awareness too.



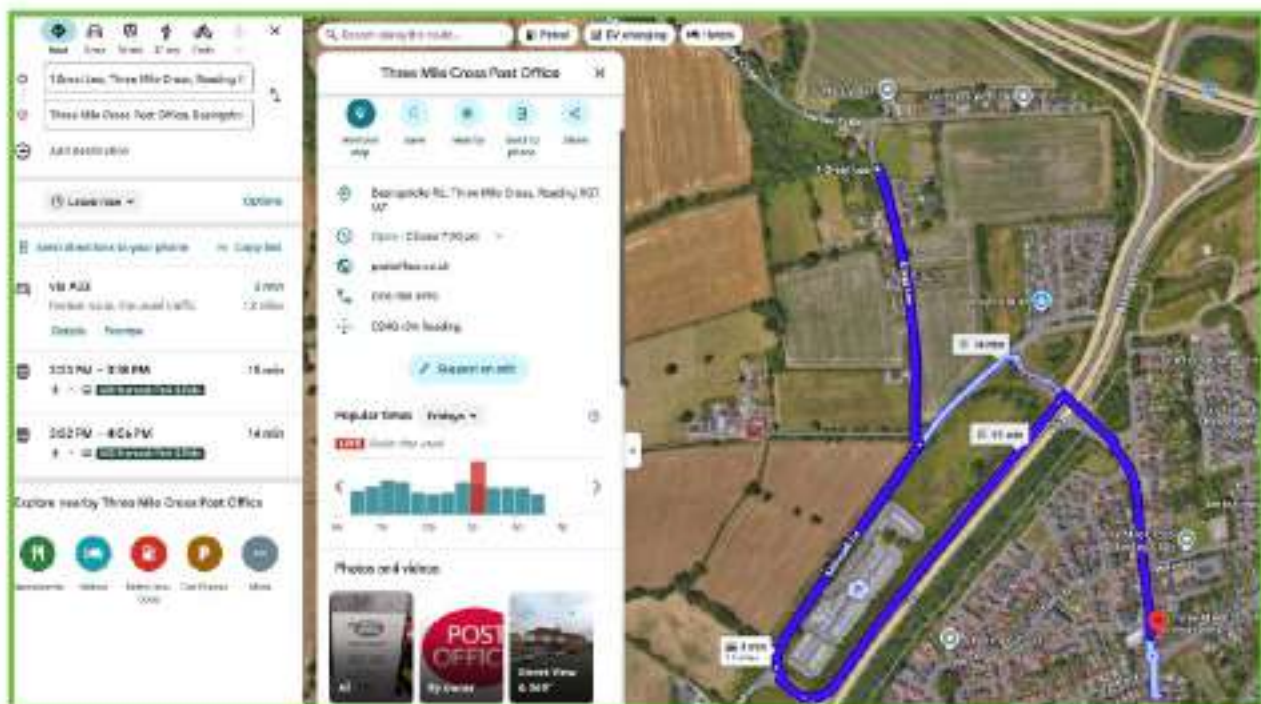
the Council. The approach taken is a balanced planning judgement applying the holistic approach and recognition that levels of provision will differ between urban and rural areas.

As can be seen in the extract below, the footpath provision surrounding the site is great and allows the site occupant to reach the Mere oak Park and Ride Bus Service entirely by foot or cycle via designated pathways and street lighting. There is also cycle storage to allow for onward travel.



Convenience store

The nearest convenience store to the site is Bargain Booze, found on: Basingstoke Rd, Three Mile Cross, Reading RG7 1AT. It is 1.2 miles away; a 3 minute drive/27 minute walk/7 minute cycle/ 15 minute public transport :



This shop offers all daily essentials required - including groceries and all day to day essentials. It is open 12.5 hours a day, 7 days a week; this ensures that access to essentials and household top-ups, are available at any convenient hour of the day, giving the site occupant great reliability for goods and service purchase.

It is also home to courier/postal services by Royal Mail enabling goods delivery services, mail/ parcel collection point and banking services. This enables the site user to have access to a widely accepted hub for mail and deliveries.

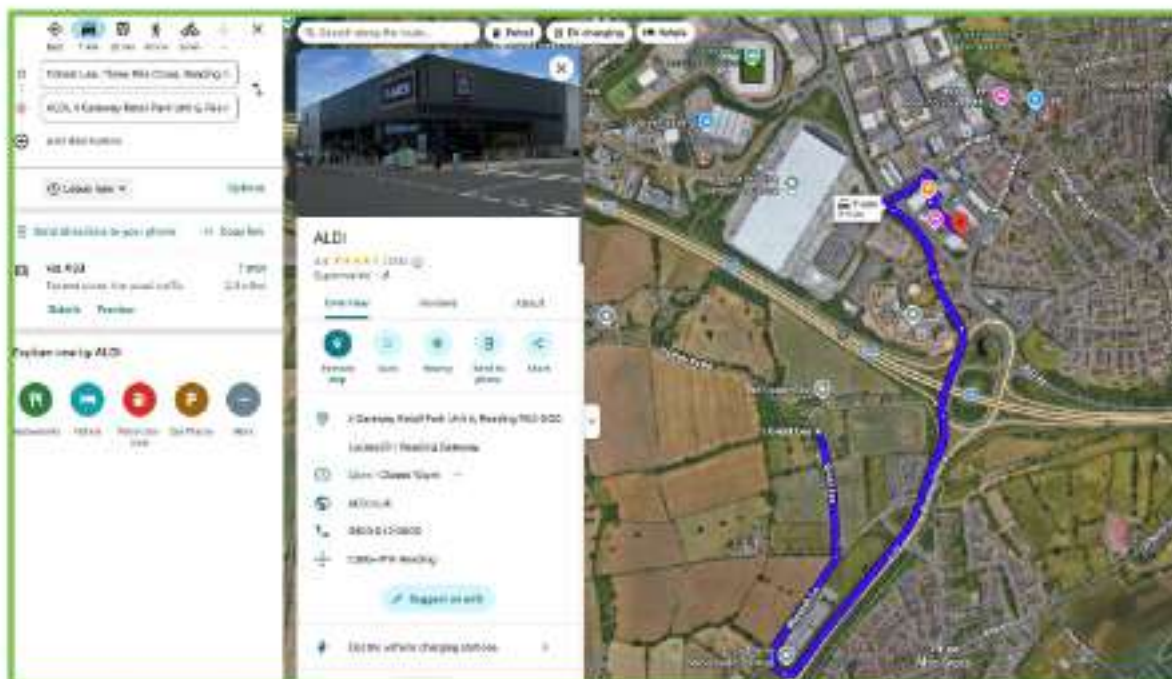


Alternative convenience Stores:

Directly opposite is BP petrol station which is home to Budgens groceries store as well.

Supermarkets

The nearest supermarket to the site is ALDI found on: 4 Gateway Retail Park Unit 6, Reading RG2 0GG. It is 2.0 miles away; a 7 minute drive/43mins walk/6 mins cycle/20 minute public transport:



This shop offers all household essentials - offering a broad range of food and non-food goods for main weekly shopping needs.

The supermarket is open 14 hours daily (8am - 10pm Mondays - Saturdays ,Sundays 10am - 4pm) offering availability to goods at any reasonable time.

This supermarket is also accessible via bus route 600 , and takes around 20 minutes. The service runs every 20 mins, and will provide the Site Occupier with a regular, reliable travel option to the Supermarket.

Alternative Superstore for wider goods :

Destination	Distance from site	Drive Time	Walk Time	Cycle Time
Costco Reading, 100 S Oak Way, Reading RG2 6UE	2.3 miles	8 mins	48 mins	11 mins



Home Delivery Service

Home delivery service available from Ocado



Great Lea - Great Lea, 1, Reading, RG7 1NP

Choose a slot type



1-hour Standard slots

Busy day? Pick a fixed 1 hour slot for delivery.



4-hour Saver slots **NEW**

Flexible? We'll confirm your 1-hour slot on the day.



Fri 02

Tue 03

Wed 04

Thu 05

Fri 06

Sat 07

Sun 08

Mon 09



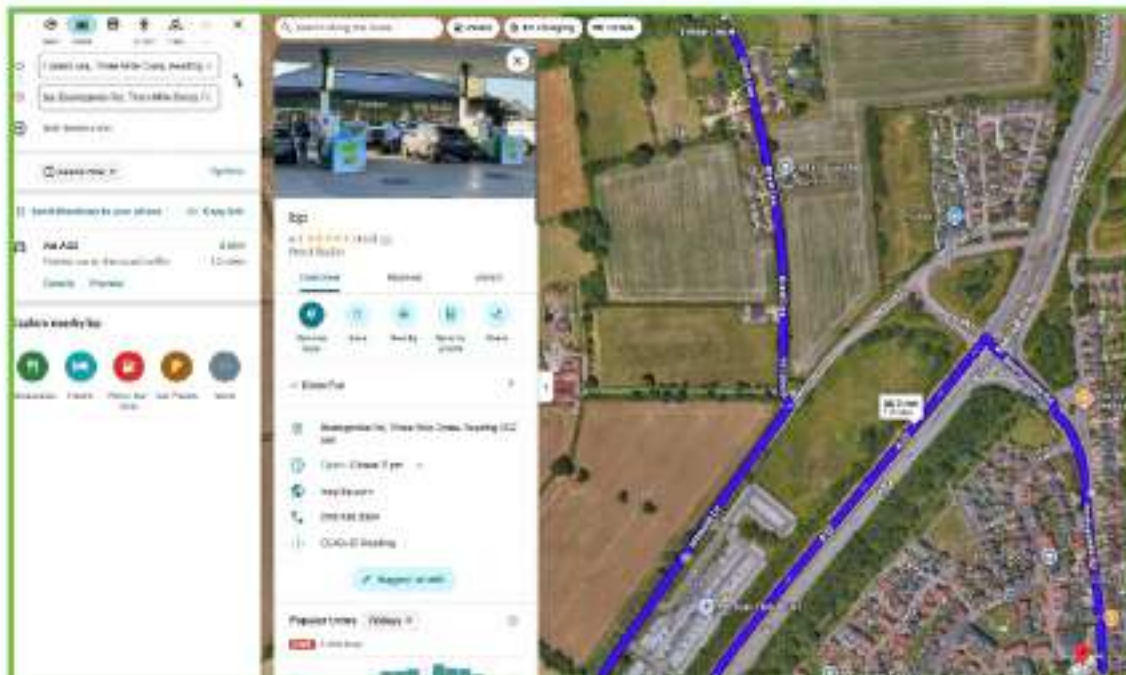
Morning

5:30-6:30am	-	-	-	-	-	£0	-
6:30-7:00am	-	£0	£0	£0	£0	£0	£0
6:30-7:30am	-	£0	£0	£0	£0	£0	£0
7:00-8:00am	-	£0	£0	£0	£0	£0	£0
7:30-8:30am	£0	£0	£0	£0	£0	£0	£0
8:00-9:00am	£0	£0	£0	£0	£0	£0	£0
8:30-9:30am	£0	£0	£0	£0	£0	£0	£0
9:00-10:00am	-	£0	£0	£0	£0	£0	£0
9:30-10:30am	-	£0	£0	£0	£0	£0	£0
10:00-11:00am	£0	£0	£0	£0	£0	£0	£0
10:30-11:30am	£0	£0	£0	£0	£0	£0	£0
11:00-12:00pm	£0	£0	£0	£0	£0	£0	£0
11:30-12:30pm	-	£0	£0	£0	£0	£0	£0
Afternoon							
12:00-1:00pm	-	£0	£0	£0	£0	£0	£0
12:30-1:30pm	£0	£0	£0	£0	£0	£0	£0
1:00-2:00pm	£0	£0	£0	£0	£0	£0	£0
2:00-3:00pm	£0	-	£0	-	£0	£0	£0
3:00-4:00pm	-	-	£0	£0	£0	£0	£0
4:00-5:00pm	£0	£0	£0	£0	£0	£0	£0
4:30-5:30pm	-	£0	£0	£0	£0	£0	£0
5:00-6:00pm	-	£0	£0	£0	£0	£0	£0
5:30-6:30pm	£0	£0	£0	£0	£0	£0	£0
Evening							
6:30-7:30pm	£0	£0	£0	£0	£0	£0	£0

This section clearly recognises the importance in providing access to medical care and regular

Petrol Stations

The nearest petrol station to the site is BP Garage, Basingstoke Rd, Three Mile Cross, Reading RG7 1BA. It is 1.2 miles away; a 3 minute drive/27 minute walk/7 minute cycle:



The petrol station is open 7 days a week (Monday - Saturday 6am - 11pm, Sunday 630am - 10.30 pm); offering its services such as cash point and in post parcel collection and drop off at most hours of the day.



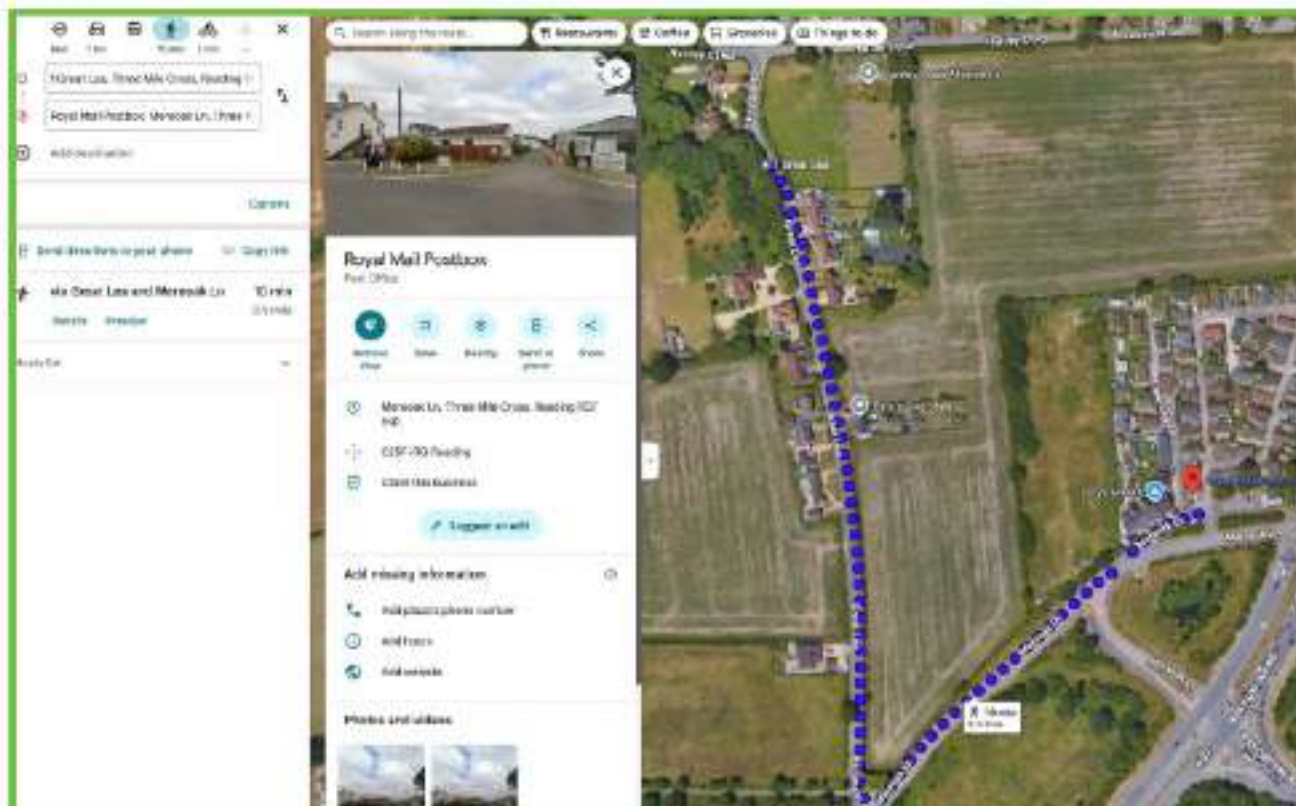
Alternative petrol station



access to education, I shall set out evidence that clearly shows a pattern between a reduced education standard and the high proportion of uk prisoners being from the G&T community,

Postal Services

The nearest post box to the site, is found outside of MereOak Mobil home Park; it is 0.5 miles 1 minute drive, 10 minutes walk or 2 mins cycle route.



The nearest **Post Office** to the site, which is staffed and offering wider postal and banking services and products, is : Three Mile Cross Post Office, Reading RG7 1AT is 1.1 miles away. It is a 3 minute drive/24 minute walk/7minute cycle

This is located within Bargain Booze, and opposite the petrol station identified, so would allow the site occupant to travel for multiple purposes, ultimately reducing the need for multiple trips and as a result they would be reducing their carbon footprint.



together with national costs associated with illegal encampments and most recently the tensions between the settled community and the traveller community from illegal encampments, where the

Pharmacy

The nearest pharmacy to the site, is Whitely Wood Pharmacy, found at 534 Northumberland Ave, Reading RG2 8NY. It is 2.6 miles away, being a 7 minute drive/8 minute cycle/35 minutes by public transport/49 minute walk.



The Pharmacy offers traditional pharmacy products, and allows customers to pick up prescriptions and purchase medical goods you'd expect from a traditional pharmacy, whilst also offering various advice services you would find within a Health clinic. It is open Monday to Saturday, between the hours of 9am-6pm, giving great reliability for health and medical goods.

Doctors/Hospital

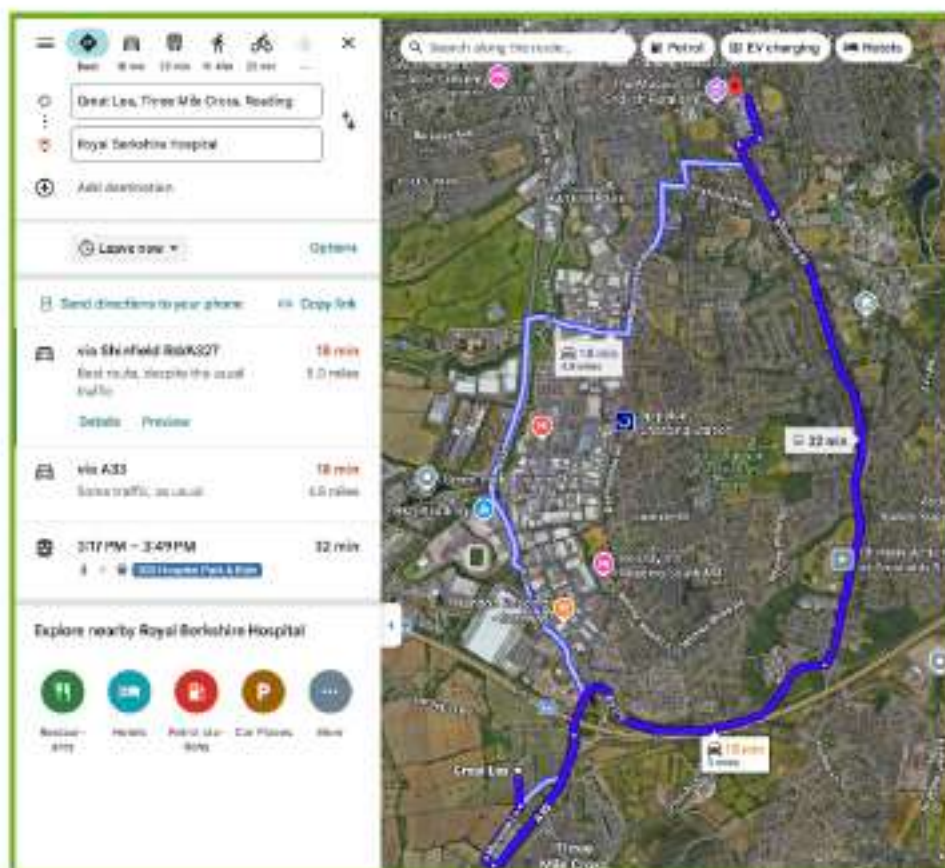
The nearest surgery to the site, is South Reading Surgery 257 Whitley Wood Rd, Reading RG2 8LE. It is 2.2 miles away, being a 6 minute drive/42 minute walk/8 minute cycle/.

The Surgery offers various services, and is run by the NHS. Below displays the website and confirmation that the the Site occupants would lie within the catchment area :



G&T feel they have no alternative but to move onto land without permission because of the lack of available sites.

The nearest hospital, with **A&E services** is Royal Berkshire Hospital, 21 Craven Rd, Reading RG1 5BD. This is typically, according to Google Maps, 4.8 miles away/18 minute drive from the site/ 32mins via public transport/22 mins cycle.



Accident and emergency (A&E) services near RG7 1NP

Accident and emergency is for severe problems like broken bones, deep wounds and anything else that is threatening your life. If this is not what you need [use NHS 111](#).

[Filter by opening times](#) (0 applied)

Your closest services are listed first

Within 5 miles

Royal Berkshire Hospital

Open for people of all ages
Opening times:
Open 24 hours

Craven Road, Reading, Berkshire, RG1 5AN

Phone: [0118 322 5111](tel:01183225111)

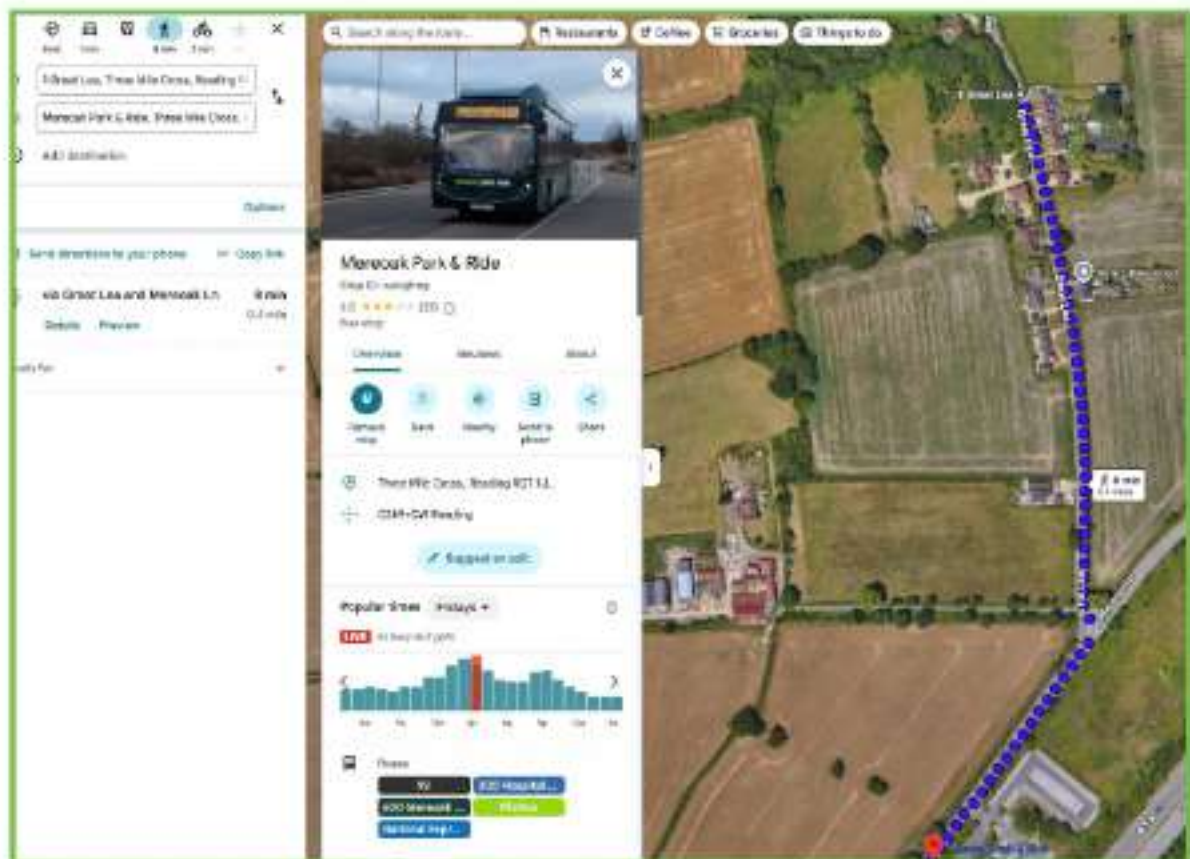
Schooling/Education

Type of Amenity	Destination	Distance from site	Drive Time	Walk Time
Nursery	3 MX Childcare	1.4 miles	5 mins	8 mins
Primary School	Spencers Wood	2.2 miles	6 mins	42 mins
Primary school	Lambs Lane	2.2 miles	5 mins	50 mins
Secondary School	Oak Bank School	1.7 miles	5 mins	37 mins
Secondary School	John Madejski	2.6 miles	7 mins	56 mins

A comprehensive selection of educational facilities are available for future child occupants of the site, all conveniently located in close proximity.

Public Transport

The nearest bus stop to the site is found 0.5 miles away. The stop is located close to the junction of Great Lea Mere oak Lane, and this is a park and ride service, though of course can be used by anyone who wishes to do so as a regular bus service. This would be a 1 minute drive/a 6 minute walk/2 mins cycle. There is footpath provision for the entire route to this stop, as well as street lighting.



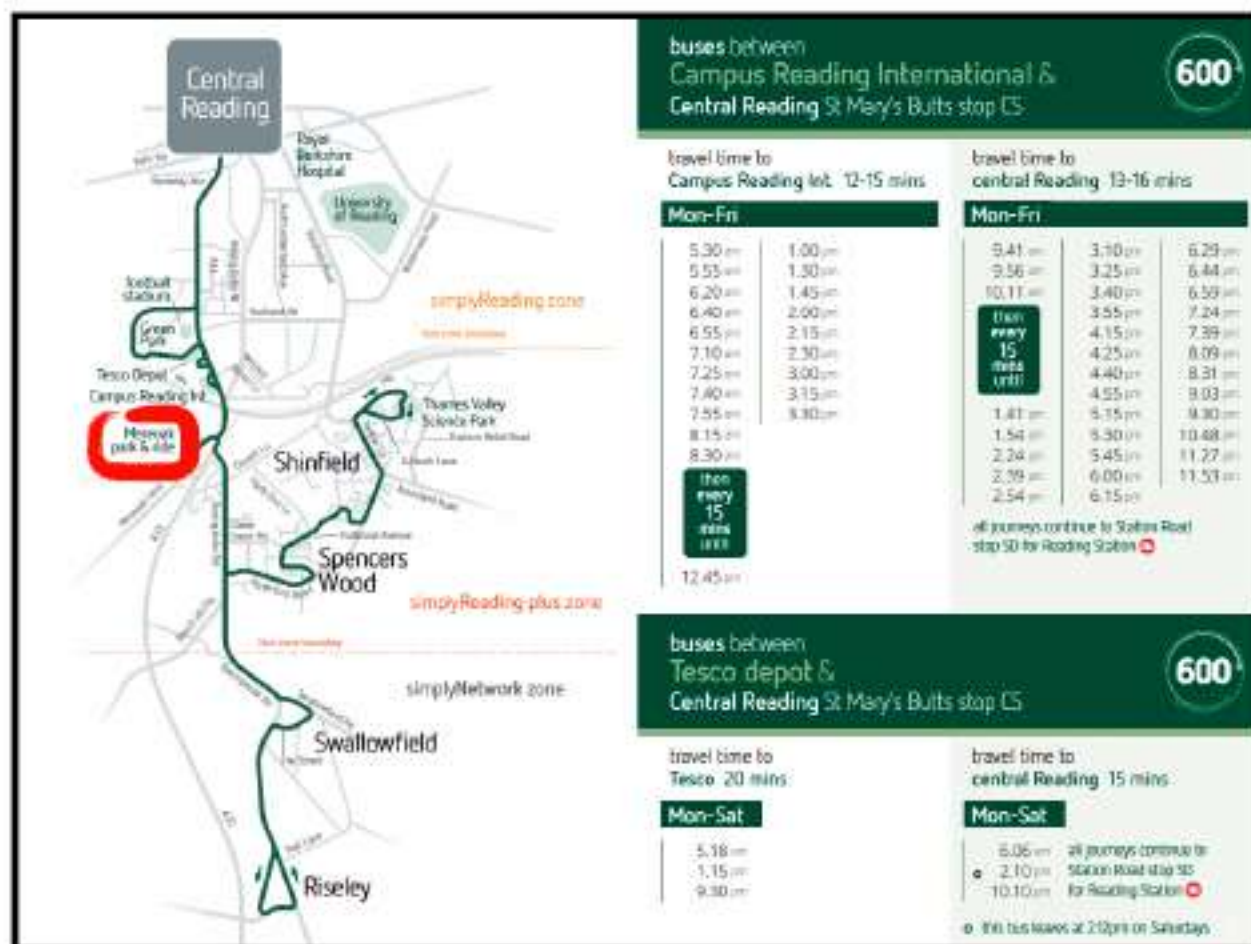
Bus Service 600 operates here, amongst other services such as National Express, 92, 300, Flixbus - with a direct bus service to Reading town centre.

The service runs at a high frequency of every 15 minutes

This provides easy access to public transport and supports sustainable travel by reducing reliance on private vehicles and associated carbon emissions.

Reading is a highly suitable location for sustainable development due to its strong education provision and diverse employment opportunities. The Route only take approximately 30 mins below is break down with the details .

Timetables and Details of the Route 600 are displayed below



I will also provide a selection of appeal decision which show the rather more hollistic approach taken by Inspectors when judging alternative transport options, access and distances to services.

Design Consideration - Pedestrian Access

The application proposal includes a pedestrian access from the site as shown on the proposed block plan, this links the site directly to the footpaths on the opposite side of the road.

Mondays to Fridays except public holidays

	am	am	am	am	am		am	am	am	am	am
Thomas Valley Science Park		6:40		7:40		8:40		47		2:00	3:13
Spencers Wood Fullbrook Avenue		6:48		7:48		8:50		54		2:07	3:21
Riseley The Bull	6:12		7:07		8:13			17		3:17	2:30
Swallowfield The Crown	6:18		7:14		8:20			23		1:23	2:36
Spencers Wood Post Office	6:23		7:20		8:26			28		1:28	2:41
Three Mile Cross Post Office	6:28	6:58	7:27	8:01	8:31	9:01		32	02	1:32	2:45
Central Reading St Mary's Butts stop CS	6:52	7:22	7:52	8:26	8:56	9:26	then at	56	26	1:56	2:39
										3:09	3:55
										4:04	4:30

	pm	pm	pm	pm	pm	pm	pm	pm	pm	pm	pm
Thomas Valley Science Park	4:27		5:47		7:00		7:46		8:40		
Spencers Wood Fullbrook Avenue	4:35		5:55		7:07		7:53		8:47		10:32
Riseley The Bull		5:04		6:20		7:17		8:09		9:08	11:05
Swallowfield The Crown		5:11		6:27		7:23		8:15		9:14	11:11
Spencers Wood Post Office		5:16		6:32		7:27		8:19		9:18	11:15
Three Mile Cross Post Office	4:44	5:19	6:04	6:35	7:15	7:30	8:00	8:22	8:54	9:21	10:39
Central Reading St Mary's Butts stop CS	5:10	5:44	6:28	6:57	7:36	7:51	8:21	8:42	9:14	9:41	10:59
											11:18
											11:44

all buses run via MereOak park&ride

MereOak park & ride towards
Central Reading
Station Road stop 50

travel time to
Central Reading 16-20 mins

Mon-Fri	Sat	Sun
5:55 am	4:20 am	5:55 am
6:33 am	4:35 am	6:41 am
6:48 am	4:50 am	7:39 am
7:03 am	5:10 am	8:09 am
7:18 am	5:25 am	8:39 am
7:33 am	5:40 am	9:10 am
7:52 am	5:55 am	9:25 am
8:07 am	6:10 am	9:40 am
8:22 am	6:25 pm	9:55 am
8:37 am	6:40 pm	10:09 am
8:52 am	6:55 pm	10:24 am
9:07 am	7:20 pm	10:39 am
9:22 am	7:35 pm	10:54 am
	8:05 pm	11:09 am
	8:27 pm	11:24 am
	8:59 pm	11:36 am
	9:26 pm	11:51 am
	10:00 pm	12:06 pm
	10:44 pm	12:21 pm
	11:23 pm	12:36 pm
	11:49 pm	12:51 pm
		1:04 pm
		1:19 pm
		1:34 pm
		1:49 pm
		2:06 pm
		2:19 pm
		2:35 pm
		2:50 pm
		3:05 pm
		3:20 pm
		3:35 pm
		3:50 pm
		4:10 pm

returning from
Central Reading
St Mary's Butts stop CS

travel time to
MereOak park&ride 22-25 mins
buses also leave from Station Road stop 50 a few minutes later

Mon-Fri	Sat	Sun
5:18 am	4:00 am	5:18 am
5:30 am	4:15 am	6:05 am
5:55 am	4:35 am	6:35 am
6:20 am	4:50 am	7:00 am
6:40 am	5:05 am	7:30 am
6:55 am	5:20 pm	8:00 pm
7:10 am	5:35 pm	8:30 pm
7:25 am	5:50 pm	8:45 am
7:40 am	6:05 pm	9:00 pm
7:55 am	6:20 pm	9:20 pm
8:15 am	6:35 pm	9:30 pm
8:30 am	7:00 pm	9:40 pm
	7:30 pm	9:50 pm
	8:00 pm	10:00 pm
	8:30 pm	10:30 pm
	9:00 pm	10:40 pm
	9:30 pm	10:50 pm
	10:00 pm	11:00 pm
	10:30 pm	11:10 pm
	11:05 pm	11:20 pm
		11:30 pm
		11:40 pm
		11:50 pm
		12:00 pm
		12:10 pm
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		2:20 pm
		2:30 pm
		2:40 pm
		2:50 pm
		3:00 pm
		3:10 pm
		3:20 pm
		3:30 pm
		3:45 pm

Saturdays

	am	am	am	am	am	am	am	am	am	am	pm	pm	pm	pm
Thomas Valley Science Park		7.48		8.49		9.47		10.45		11.45		12.41		1.43
Spencers Wood Fulbrook Avenue		7.55		8.56		9.55		10.53		11.51		12.49		1.51
Riseley The Bull	7.29		8.20		9.20		10.18		11.15		12.15		1.14	
Swallowfield The Crown	7.26		8.26		9.26		10.25		11.22		12.21		1.20	
Spencers Wood Post Office	7.31		8.31		9.31		10.30		11.27		12.26		1.25	
Three Mile Cross Post Office	7.34	8.04	8.34	9.05	9.35	10.04	10.34	11.04	11.31	12.01	12.31	12.59	1.29	2.01
Central Reading St Mary's Bells stop CS	7.55	8.25	8.55	9.25	9.55	10.25	10.55	11.25	11.55	12.25	12.55	1.25	1.55	2.27

	pm	pm	pm	pm	pm	pm	pm	pm	pm	pm	pm	pm	pm	pm
Thomas Valley Science Park		2.44		3.48		4.49		5.50		6.50		7.50		8.49
Spencers Wood Fulbrook Avenue		2.51		3.55		4.56		5.57		6.57		7.57		8.56
Riseley The Bull	2.15		3.16		4.20		5.22		6.09		7.22		8.20	
Swallowfield The Crown	2.21		3.22		4.26		5.28		6.15		7.28		8.26	
Spencers Wood Post Office	2.25		3.26		4.30		5.32		6.19		7.32		8.30	
Three Mile Cross Post Office	2.30	3.00	3.30	4.04	4.34	5.04	5.35	6.05	6.22	7.05	7.35	8.05	8.33	9.03
Central Reading St Mary's Bells stop CS	2.55	3.25	3.55	4.25	4.55	5.25	5.55	6.25	6.42	7.25	7.55	8.25	8.55	9.25

	pm	pm	pm	pm
Thomas Valley Science Park		10.32		11.32
Spencers Wood Fulbrook Avenue	9.20		11.06	
Riseley The Bull	9.26		11.12	
Swallowfield The Crown	9.30		11.16	
Spencers Wood Post Office	9.33	10.40	11.19	11.45
Three Mile Cross Post Office	9.55	11.02	11.41	12.07
Central Reading St Mary's Bells stop CS	2.55	3.25	3.55	4.25

buses arrive at Station Road stop SD
a few minutes later

all buses run via Mere Oak park&ride

Mondays to Fridays except public holidays

	am	am	am	am	am	am	am	am	am		pm	pm
Central Reading St Mary's Bells stop CS	5.30	5.56	6.20	6.55	7.25	7.55	8.30	9.00	9.30	then at 30 45 00 30 05 35 11 01 04 08 12 until	1.00	1.45
Central Reading Station Road stop SD	5.35	6.00	6.25	7.00	7.30	8.00	8.35	9.05	9.35		1.05	1.50
Three Mile Cross Post Office	5.58	6.23	6.49	7.25	7.56	8.26	9.01	9.30	10.01		1.31	2.16
Spencers Wood Post Office	6.01		6.52		8.00		9.04		10.04			2.19
Swallowfield The Crown	6.05		6.56		8.04		9.08		10.08			2.23
Riseley The Bull	6.09		7.00		8.08		9.12		10.12			2.27
Spencers Wood Fulbrook Avenue		6.30		7.32		8.34		9.37		30	1.38	
Thomas Valley Science Park		6.37		7.39		8.41		9.44		45	1.45	

	pm	pm	pm	pm	pm	pm	pm	pm	pm	pm	pm	pm	pm	pm	pm	pm
Central Reading St Mary's Bells stop CS	2.15	3.00	3.30	4.15	4.50	5.35	6.05	6.35	7.00	7.30	8.00	8.30	9.00	10.00	10.30	11.05
Central Reading Station Road stop SD	2.20	3.05	3.35	4.20	4.55	5.40	6.10	6.40	7.05	7.35	8.05	8.35	9.05	10.05	10.35	11.10
Three Mile Cross Post Office	2.46	3.35	4.05	4.48	5.22	6.06	6.36	7.04	7.28	7.58	8.25	8.55	9.25	10.25	10.55	11.30
Spencers Wood Post Office		3.39		4.52		6.10		7.08		8.01		8.58			10.58	
Swallowfield The Crown		3.43		4.57		6.15		7.12		8.05		9.02			11.02	
Riseley The Bull		3.47		5.01		6.19		7.16		8.08		9.06			11.05	
Spencers Wood Fulbrook Avenue	2.53		4.13		5.31		6.44		7.36		8.32		9.32	10.30		11.37
Thomas Valley Science Park	3.00		4.20		5.38		6.51		7.43		8.39					

all buses run via Mere Oak park&ride

Central Reading | Spencers Wood | Riseley | TVSP

via Mere oak park&ride, Three Mile Cross & Swallowfield

Mere oak park&ride

600

Saturdays

	am	am	am	am	am	am	am		pm	pm	pm
Central Reading St Mary's Butts stop CS	6.35	7.00	7.30	8.00	8.30	9.00	9.30	09 30	2.00	2.30	3.00
Central Reading Station Road stop SD	6.40	7.05	7.35	8.05	8.35	9.05	9.35	05 35	2.05	2.35	3.05
Three Mile Cross Post Office	7.00	7.25	7.55	8.25	8.55	9.25	9.55	27 57	2.27	2.58	3.28
Spencers Wood Post Office	7.03		7.58		8.58		9.58	00		3.01	
Swallowfield The Drove	7.07		8.02		9.02		10.02	04		3.05	
Riseley The Bull	7.11	+	8.06	+	9.06	+	10.06	08	+	3.09	+
Spencers Wood Fulbrook Avenue		7.31		8.31		9.32		34		2.34	3.35
Thames Valley Science Park		7.37		8.37		9.38		41		2.41	3.42

	pm	pm	pm	pm	pm	pm	pm	pm	pm	pm	pm
Central Reading St Mary's Butts stop CS	3.30	4.00	4.30	5.00	5.30	5.50	6.30	7.00	7.30	8.00	8.30
Central Reading Station Road stop SD	3.35	4.05	4.35	5.05	5.35	5.55	6.35	7.05	7.35	8.05	8.35
Three Mile Cross Post Office	3.58	4.27	4.57	5.27	5.57	6.17	6.57	7.26	7.56	8.26	8.56
Spencers Wood Post Office	4.01		5.00		6.00		7.00		7.59		8.58
Swallowfield The Drove	4.05		5.04		6.04		7.04		8.03		9.02
Riseley The Bull	4.09	+	5.08	+	6.08	+	7.08	+	8.07	+	9.06
Spencers Wood Fulbrook Avenue		4.35		5.35		6.25		7.33		8.33	10.32
Thames Valley Science Park		4.42		5.42		6.32		7.40		8.40	11.37

all buses run via Mere oak park&ride

Mere oak park&ride | Central Reading

fast via A33

Mere oak park&ride

600

Sundays & public holidays

	am	am	am	am	am		pm	pm	pm
Mere oak park&ride	7.55	8.55	9.55	10.55	11.55	then every hour until	5.55	6.55	7.40
Central Reading St Mary's Butts stop CS	8.10	9.10	10.10	11.10	12.10		6.10	7.10	7.55

buses arrive at Station Road stop SD a few minutes later

Central Reading | Mere oak park&ride

fast via A33

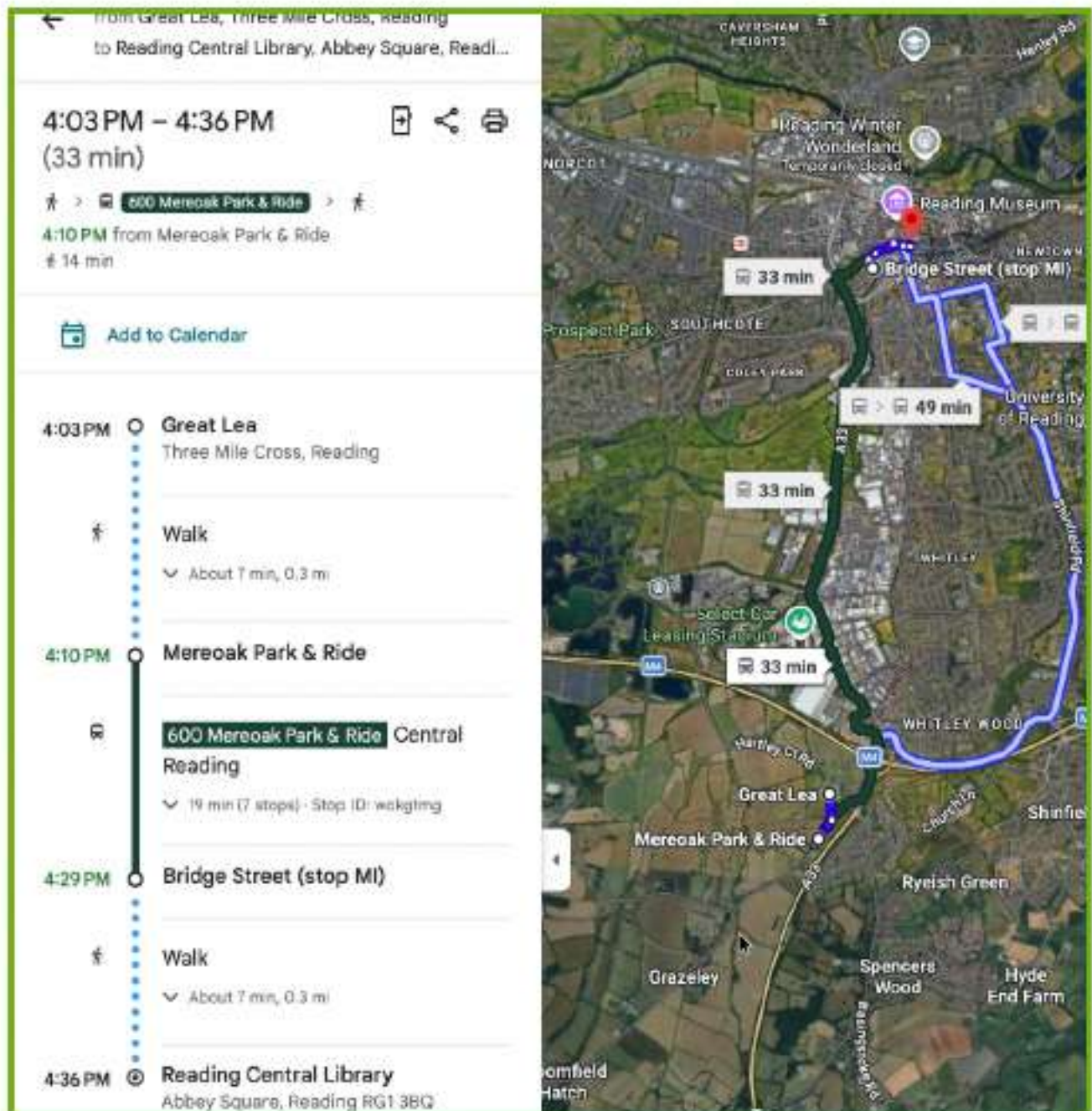
Mere oak park&ride

600

Sundays & public holidays

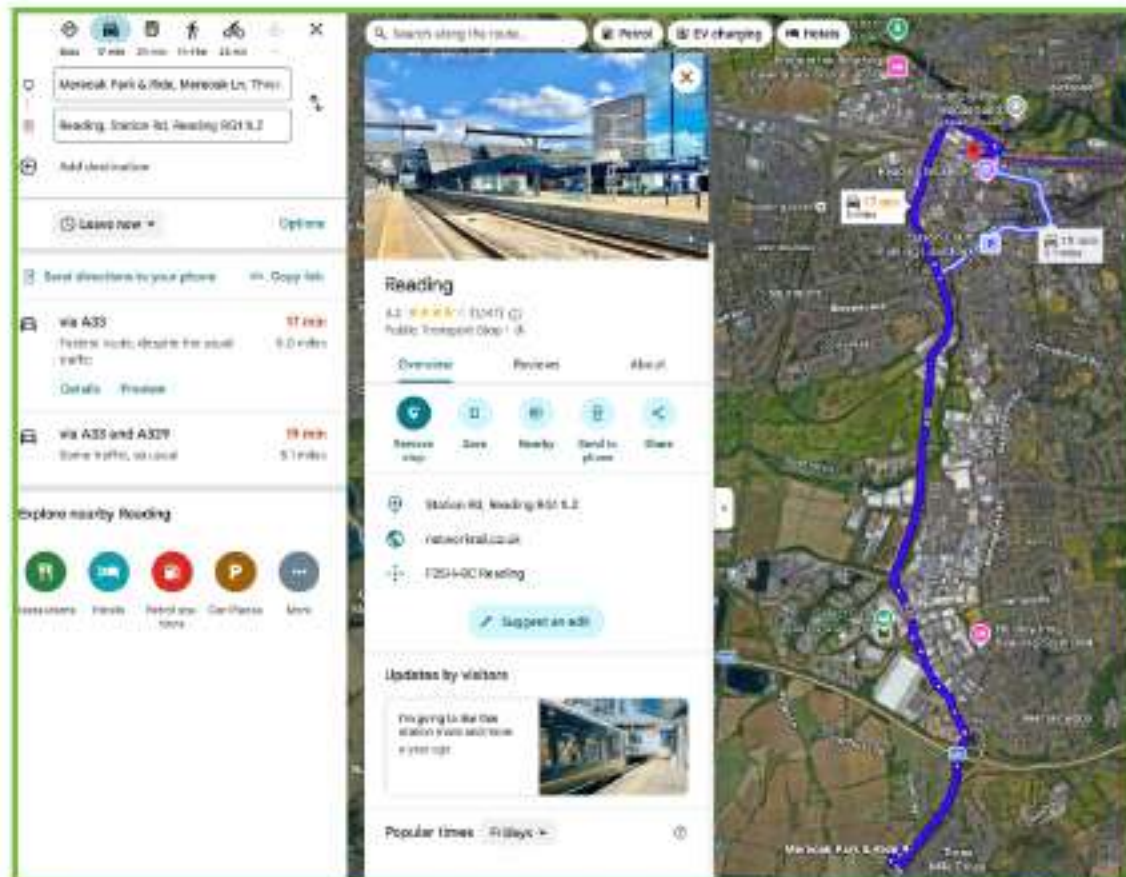
	am	am	am	am	am		pm	pm
Central Reading St Mary's Butts stop CS	7.35	8.20	9.20	10.20	11.20	then every hour until	6.20	7.20
Central Reading Station Road stop SD	7.40	8.25	9.25	10.25	11.25		6.25	7.25
Mere oak park&ride	7.55	8.40	9.40	10.40	11.40		6.40	7.40

Screenshot of route from site to Reading Centre via Route 600, which takes approx 19mins:



Train station

The closest and most convenient train station to the site is Reading Train Station, which can be reached via the Mere oak Park and Ride in just 34 minutes:



Details of the train to London, from Reading is shown below, and these services run approximately every 25 mins as a direct connection to Central London.

Reading (RDG)

London Waterloo (WAT)

Single journey for 1 adult

[Edit Journey Details](#)

Journey details

Choose ticket

Travel details

Payment

Refine your tickets
☐ Standard Class
☐ First Class
☐ Direct trains only
[FASTER JOURNALS](#)

Outward →

Reading (RDG) → London Waterloo (WAT)

Previous day
Wed 4 Feb
Next day

[Show earlier trains](#)

Departure time		Arrival time	Status	Duration	Changes	Prices from
15:05	→	16:08	On time ⚠	01:01 hrs	1	£32.30
15:09	→	16:33	On time ⚠	01:24 hrs	0	Cheapest £18.10
15:13	→	16:12	On time ⚠	00:57 hrs	1	£32.30
15:15	→	16:35	On time ⚠	01:03 hrs	1	£32.30

From
London (Any)

To
Reading (Any)

Out
Tu 3 Feb • 13:45

Return
Tu 3 Feb • 14:45

1 adult (16+)
Add railcards

Train • £29.00
Coach • £21.00
Add via or avoid
Split fare

OUT
Tue 3 Feb 2026
London Paddington (PAD) to Reading (RDG)

RETURN
Tue 3 Feb 2026
Reading (RDG) to London Paddington (PAD)

13:30
13:32
13:38
13:47

13:53
13:55
14:16
14:40

£29.30
£29.30
£29.30
£29.30

14:42
14:43
14:48
14:50

15:22
15:07
15:12
15:14

£29.30
£29.30
£29.30
£29.30

£35.10
£35.10
£35.10
£35.10

£35.10
£35.10
£35.10
£35.10

£62.00
£62.00

Off-Peak Day Single
Any off-peak train.

Anytime Day Single
Travel any time of day.

Anytime Day Single (1st Class)
Travel any time of day.

Total
£30.59

[Price breakdown](#)

1 Adult

Continue

Go to checkout

OUT
Tue 3 Feb
London Paddington to Reading
35m, 0 changes

RETURN
Tue 3 Feb
Reading to London Paddington
30m, 0 changes

Off-Peak Day Return
£29.40

You've selected the 13:38 and 14:42, but you can travel on any suitable off-peak train.

Any off-peak train. Return same day.

Travel is allowed via any permitted route.

Travel also permitted from stations near London Paddington. [View stations](#)

Page 46 of 81

Reading is served by multiple train networks;

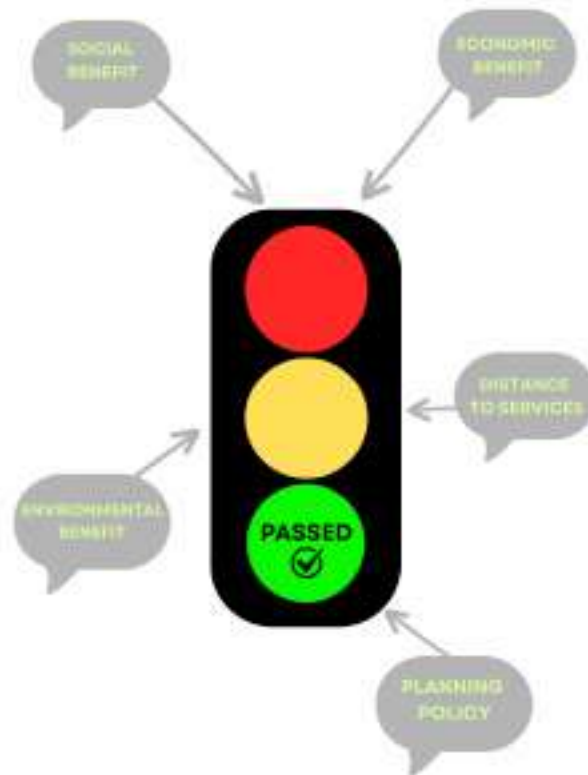


Trains



A map of the Rail network is shown below





Summary

In applying the site specifics to the holistic approach for the type of development in the rural location, it is clearly evidenced that the site is sustainable and provides strong and realistic alternatives modes of sustainable travel.

These include walking and cycling to nearby onward public transport connections as well as local shops and services, and nearby short car journeys, which will align with the policy aims of reducing the need for long distance travelling, a benefit derived from having a settled base.

I shall now set out a brief overview of just some of the benefits derived from that settled base.

Settled Base Benefits

There are benefits to the Local Communities and the Nation as a whole in providing travellers and Gypsies with a permanent settled base, that should be fully considered in any planning balancing exercise.

Public Interest

There is a real benefit to the public interest in bringing forward permanent and settled sites for travellers in the UK, where there is a significant shortage of sites.

The recent ruling in the in the High Court 14 May 2024, in relation to the Police Act 2022, a case brought by Wendy Smith and others, the Judge ruled that parts of the Act, were discriminatory and in breach of the European Convention of Human Rights.

The ongoing shortage of transit site provision and overall pitch provision both locally and nationally combined with the persistent hostile approach to gypsies and travellers, has ensured that Gypsy and Travellers are often left with little choice when it comes to securing homes for themselves.

Such as;

Raising education standards for children, with a low level of reading and writing being a common factor in criminal sentencing and those persons in prison. The effects of keeping people out of a life of crime and in paid employment are substantial.

It is reported by the Ministry of Justice that 57% of adults in prison in the UK have a reading level below that of an average 11 year old, with a yearly cost of £45,000 to house a single prisoner.

Access to regular mainstream education must be priority for the nation and it is widely reported that those Travellers with a settled base will ensure attendance to school for all children typically to the age of 12 and in an increasing number of cases beyond.

Contents

- Foreword
- Executive summary
- Introduction
- Context
- Reading education in prisons: not given sufficient priority in the prison system
- Prison education provision: not organised in ways that support prisoners to improve their reading
- Prison education: not well designed to improve reading
- Prisoners with low general literacy levels are not reading generally across the prison system
- Reading education: among the most successful interventions for reducing re-offending
- Methodology
- Conclusion
- Index
- Appendix A
- Appendix B

Introduction

HMPPS inspect the overall effectiveness of education, skills and work in prisons and young offender institutions (YOIs) as part of HMPPS's joint inspections of prisons. [Find out more](#)

When we carried out research into prison education in 2009, we found that several aspects of it were poor. [Find out more](#) For example, curriculums did not take account of what prisoners had learned before, records of prisoners' learning were not transferred between prisons and assessments of prisoners' educational needs on entry were often inaccurate or not valid. Sadly, our new study has found that there has been little progress in the last 14 years.

We recently published a commentary which concluded that prison education is still in a poor state. [Find out more](#) As a result, HMPPS and HMPS called for prison education to be given much greater attention. We committed to carrying out a year-long review of prison education, which included this research into reading in prisons.

Prisoners have much lower levels of literacy than the general population. The most recent data published by the Ministry of Justice shows that 57% of adult prisoners taking initial assessments had literacy levels below those expected of an 11-year-old. [Find out more](#)

Low reading ability limits prisoners' ability to navigate life in prison. For example, they may struggle to access written information, such as family and legal correspondence, menus or faith-based texts, and struggle to fill out forms. This makes them more vulnerable and puts them at risk of becoming isolated. It also prevents them from fully participating in the purposeful activities available in the prison such as education or work. If they cannot read proficiently, then time in prison, especially during long sentences, can become even more challenging and unproductive.

A lack of reading skills also limits prisoners' ability to navigate life after prison. Prisoners without employment-related skills and knowledge are likely to find it more difficult to access opportunities for rehabilitation and resettlement on release. For example, completing forms to open a bank account and applying for jobs, education or training become difficult or impossible tasks. This may make it less likely that they will get into work and more likely that they will reoffend.

In prisons, reading education is currently delivered through wider English classes. These include functional skills classes, which teach the core skills required for employment and independent living. These classes include speaking and listening, reading and writing. Reading skills are also included as part of English for speakers of other languages (ESOL) classes, which teach those whose first language is not English to read in English. When prisoners cannot read at all, a voluntary programme to teach reading is sometimes available, at the discretion of the governor.

Since 2016, functional skills qualification content has included a greater focus on the theory behind how you learn to read. Prisoners need to have learned, securely, the underlying knowledge to reading in order to read well. For example, to read manuals, letters, form-filling or legal correspondence, prisoners need to have knowledge of the fundamental blocks that make up learning to read.

Probation This article is more than 10 years old

One in 20 prisoners of Gypsy, Romany or Traveller background, says HMIP

Proportion is 5% in English and Welsh jails but even higher in establishments holding children, such as secure training centres



Ministry of Justice figures suggest that 5% of the prison population - the proportion of inmates that identify as Gypsy, Romany or Travellers - would equate to just over 4,200 inmates. Photograph: Martin Godwin

Prisoners of Gypsy, Romany or Traveller backgrounds are significantly over-represented in jails in England and Wales, inspectors have found.

One in 20 inmates - or 5% - told Her Majesty's Inspectorate of Prisons (HMIP) that they considered themselves to be Gypsy, Romany or Traveller in 2012-13, compared with 4% the previous year.

Based on the most recent prison population figures from the Ministry of Justice, 5% would equate to just over 4,200 inmates and is similar to the total number of women in prisons.

The proportion is even higher in secure training centres (STCs), which hold young people between 12 and 18 years old, with 12% considering themselves Gypsy, Romany or Traveller. In Medway STC in Kent, this figure was 22%.

Most viewed



Swedish children to start school a year earlier in move away from play



Teachers in England offered lie-ins to make job more appealing



Campaigners call for unlimited 'climate card' UK rail pass



Agatha All Along review - the perfect show for Halloween season



Hilary Mantel was my mentor. Here are seven things she taught me about writing - and life

It is imperative and clearly in the public interest to enable regular access to education and a stable home life to traveller children to raise the average reading and literacy skills in order to provide better prospects and alternative life choices to better equip minorities from the community to take different pathways and reduce the chances of ending up in the prison system and all the costs associated with this

A reduction in illegal encampments or encampments which result in significant infrastructure costs, in matters such as security, policing and clean up bills, the cost of which is all met with taxpayer funds.

In October 2018 the Daily Echo Newspaper, the South Coasts local paper reported that illegal encampments has costs the taxpayer in just 3 years, over £2000000.00 in clean up costs.

There is clearly an overriding public interest in securing lawful plots and pitches in which to provide settled bases to the travellers so they do not turn to an illegal roadside existence.

dailyecho.co.uk

Daily Echo

Cleaning up after travellers cost £2m - new figures reveal



As well as that, the new fixed penalty notice for littering will rise by £20 - from £80 to £100.

Share



15 Comments

CLEANING up traveller camps costs taxpayer £2m - but is also hitting South East farmers and landowners hard, says CLA (The Country Land and Business Association).

It's not just the taxpayer paying clean-up bills for travellers' camps, the CLA has warned - farmers and landowners are being hit hard in the pocket too.

It comes as a BBC investigation has discovered that it has cost the public purse almost £2 million in less than three years in the South. The BBC said the bill accounts for more than 1,400 illegal encampments that have been reported since 2015.

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Welfare and Health

The ability to provide an accessible and permanent postal address enables family members to access the medical services available to citizens of the United Kingdom and for all members of the family, including those more vulnerable or unable to make their own decisions, such as the Child, to not penalised by the choice of their parents.

In addition, families are able to access other Government financial benefits they maybe entitled to, which in turns raises the standards of care and lifestyle of the resident dependants.

Page 51 of 81

Updated November 2023

Briefing: Economic and financial exclusion experienced by Gypsies and Travellers in England

Friends, Families & Travellers

Briefing: Economic and financial exclusion experienced by Gypsies and Travellers in England, April 2023

Compiled by Abbie Kirkby, Billie Dolling, John Henry Phillips, Victoria Gilmore

Key facts

- It is estimated there are 300,000 Gypsies and Travellers in the UK.
- 53% of Gypsies and Travellers who responded to the [2021 Census](#) were economically inactive^{1,2}.
- Of [2021 Census](#) respondents who identified as Gypsies and Travellers, 41% were employed, including 15% in self-employment.
- Gypsies, Roma and Travellers have the [lowest educational attainment](#), at all key stages up to and including KS4, out of any ethnic groups in the UK.
- The life expectancy of Gypsies and Travellers is [10-25 years shorter](#) than the general population.
- The [2021 Census](#) reported Gypsies and Travellers to be the ethnic groups which provided the highest levels of unpaid care of 50 hours or more.
- Gypsies and Travellers have the highest level of disability out of all ethnic groups at [16%](#), double that of the overall population.
- The [National Barometer of Prejudice and Discrimination](#) found Gypsies and Travellers to be the ethnic groups that people held the highest level of prejudice towards, compared with other protected characteristic groups.

It is clear that changes are needed, if we are to make longterm changes to both the quality and standard of living for Gypsies and Travellers combined with ensuring that in doing so, there is a cohesion with members of the settled community.

To remove prejudice and racism will take time and change from Gypsies and Travellers as well as those members who hold the feelings towards this sector of society.

In providing access to education, job opportunities, balanced medical and financial assistance, I consider that these will underpin the pathway to ensuring that overtime significant benefits are delivered to all parts of society.

The sustainable benefits delivered by providing a settled base are wide and vast, to both the applicants but also to the settled community.

It is considered that the application site is a sustainable location when all of the relevant measurable metrics and legislation is considered.

Recent Newspaper Headlines

In recent months we have seen more and more Gypsy and Traveller families having to take the drastic action of moving onto land without first having secured planning permission. These steps are not taken lightly and are often as a result of previous frustrations and perceived prejudice experienced. This can result in significant legal and court costs as well as immense unrest between different sectors of the communities.

It is imperative that a greater number of consents are given to ensure that all persons identified housing needs are being met.



The language and phrasing often associated with sensational media reporting of Gypsy and Traveller applications or where sites have been partially or fully developed prior to obtaining planning consent is often borderline racist.



In the UK today, racism against Gypsies, Roma; and Travellers (GRT) remains one of the last socially acceptable forms of prejudice. While other communities see support, progress, and protection from harmful stereotypes, the GRT population continues to be vilified—both blatantly and subtly—across mainstream media, public forums, and even police-run social media pages.

This is not simply about isolated comments or individual prejudice. This is systemic, deep-rooted, and actively harming lives.

Media Bias and Double Standards

The Daily Mail recently published a sensationalist article titled "Britain's traveller land-grabbing blitz revealed in new map." It uses inflammatory language such as "illegal camps", "land grabs", and "invasions", with no attempt to include a Traveller perspective or to address why so many families are forced to occupy land without permission in the first place. Councils routinely fail to meet their legal obligations to provide authorised sites, leaving families with no lawful place to stop.

In another example, Sky News covered the Appleby Horse Fair—Europe's largest gathering of Gypsies and Travellers—not to celebrate its cultural significance, but to criticise the aftermath of the event. The headline focused solely on rubbish left in fields, completely ignoring the thousands who attended peacefully, the centuries-old heritage of the event, or the reality that all large festivals result in clean-up operations. There is little to no mention of the Gypsy and Traveller families who stayed behind to support Billy Welch in the clean-up of Appleby, or of the significant contributions they made to the effort. In June 2023 alone, Gypsies and Travellers raised £24,000 to help fund the clean-up operation.

Compare this to the coverage of Glastonbury or Notting Hill Carnival, where litter is never weaponised against the culture of the attendees.

The message is clear: when Gypsies and Travellers gather, it's criminalised. When others do, it's celebrated.

It is evidently clear, that a chronic and very real shortage of pitches and sites to accommodate Gypsies and Travellers is causing real tensions and issues for all sectors of society, this often failure of policy and statutory requirement to supply sites must be addressed to meet everyone's needs and to ensure harmony between settled and travelling communities.

Vicious Cycle - Document Submission Ref: PD27

A number of Government studies have been undertaken over the years to try and understand the implications to all sectors of society from a lack of gypsy and traveller site provisions and how they affect each sector.

A study by the Equalities Commission sets out the affects to Gypsies and Travellers from a lack of a 5 year supply of sites and the adverse negative views formed within the settled community toward G&T from such matters as roadside living and Intentional Unauthorised Development, which run counter to the Governments aim of a peaceful coexistence.

8.2.5 A vicious circle

One of the main results of the weaknesses described above is to intensify public resistance to providing sites and services for Gypsies and Irish Travellers, leading to:

- greater local authority reluctance to provide suitable sites, and, therefore, to more unauthorised encampments or developments;
- fewer resources being made available for managing sites to acceptable standards, and, therefore, to run-down sites, with incidents of anti-social behaviour; and
- reluctance to provide basic services for unauthorised encampments, and, therefore, to accumulating rubbish and damage to the environment.

Each of these situations, with their negative effects on the environment, on Gypsies and Irish Travellers living on sites, and on neighbouring residents, ratchets up tensions in the community, entrenching resistance to providing any more sites or services, and culminating in pressure on local councils not to provide services and to take a strong enforcement approach. Our recommendations below are designed to help break out of this vicious circle (see figure 2.3).

Elsewhere, authorities that are not meeting Gypsies' and Irish Travellers' need for accommodation on the same basis as for others in the community, and not dealing with the consequent damage to community relations, risk non-compliance with their legal responsibilities under the statutory general duty to promote race equality and good race relations.

Common Ground Equality, good race relations and sites for Gypsies and Irish Travellers

Many are also failing to put their race equality schemes, and the arrangements these call for, into effect, and are therefore at risk of legal challenge, by individuals, and by the CRE itself. The statutory general duty is enforceable by way of judicial review, while the specific duties can be enforced by the CRE.

The policies and procedures of police forces in respect of unauthorised encampments, and the way they handle reports of crime on sites, suggests that their progress in meeting the duty in respect of these two ethnic minority groups is equally patchy.⁴⁶

The duty to promote race equality and good relations is not an end in itself, but a means to uncover and tackle racial inequality and poor race relations. The CRE has identified equality, participation and interaction as the three essential components of an integrated society, and we now examine our findings in the light of these.

Access Safety

Before proceeding to look at the sites existing vehicle access and the proposed pedestrian access, I have looked at the Highways functionality in and around the site to see how if there are any recorded crash or incidents.

As can be seen from the inserted image below, there are no recorded crashes or incidents in the vicinity of the sites existing entrance.

The only recorded accident on Great Lea, is further north on the sharp bend, this accident is recorded as a single vehicle driver error.

The screenshot displays the crashmap.co.uk website interface. The map shows Hartley Ct Rd and Great Lea. A red circle highlights a location on Great Lea. A pop-up window titled "Incident Details" shows the following information:

- Date:** 16/01/2022
- Severity:** Slight
- Number of Vehicles Involved:** 1
- Number of Casualties Involved:** 1
- [View Detailed Report](#)

The sidebar on the right contains the following filters:

- Location:** rg7 Tnp
- Years:** 5 of 26 years selected
- Severity:** Fatal, Serious, Slight (all selected)
- Casualty Types:**
- Vehicles Involved:**

At the bottom left, there is a legend for Incident Severity: Slight (yellow), Serious (red), and Fatal (black).

Visibility Splay Drawing - Document Submission Ref: PD4



Pedestrian Access

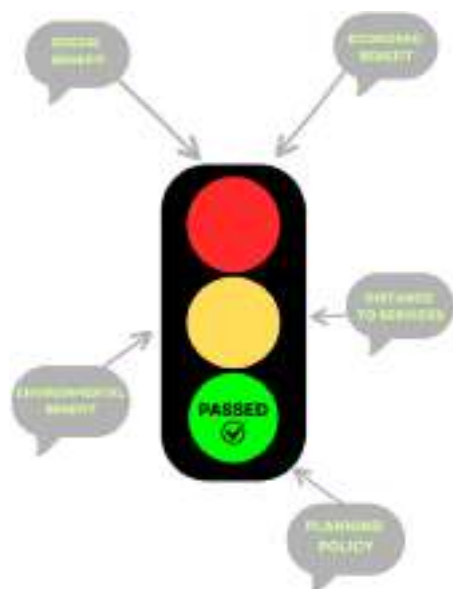
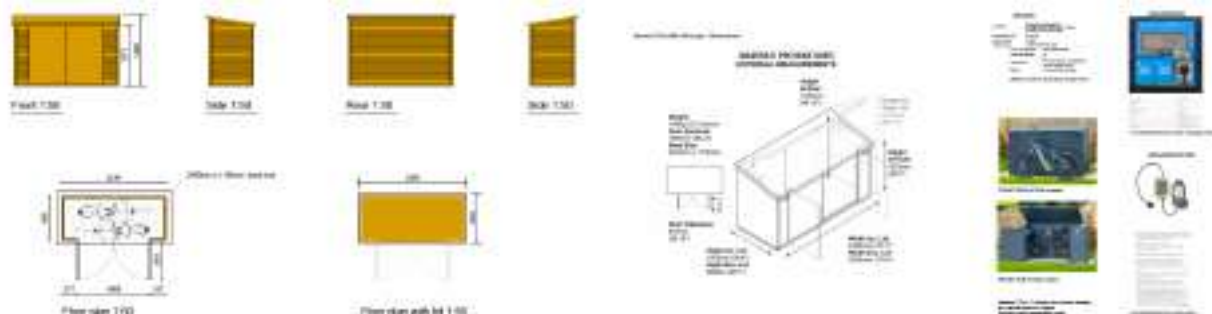
It is proposed to add a pedestrian gate within the sites boundary to ensure that site occupants have the option to safely exit the site to a verge of the highway that allows them to cross to the opposite side of the road that provides a footpath link to the bus services.

A plan showing the proposed access is submitted, **Document Submission Ref: PD3**



Page 30 & 31 of this statement shows the connectivity between the site and the park and ride, which also has cycle store provision, allowing persons to hop on the bus into Reading Town.

The application also includes the safe storage and charging capabilities for Ebikes, the drawings showing the details are **Document Submission Ref: PD7 & PD8**.



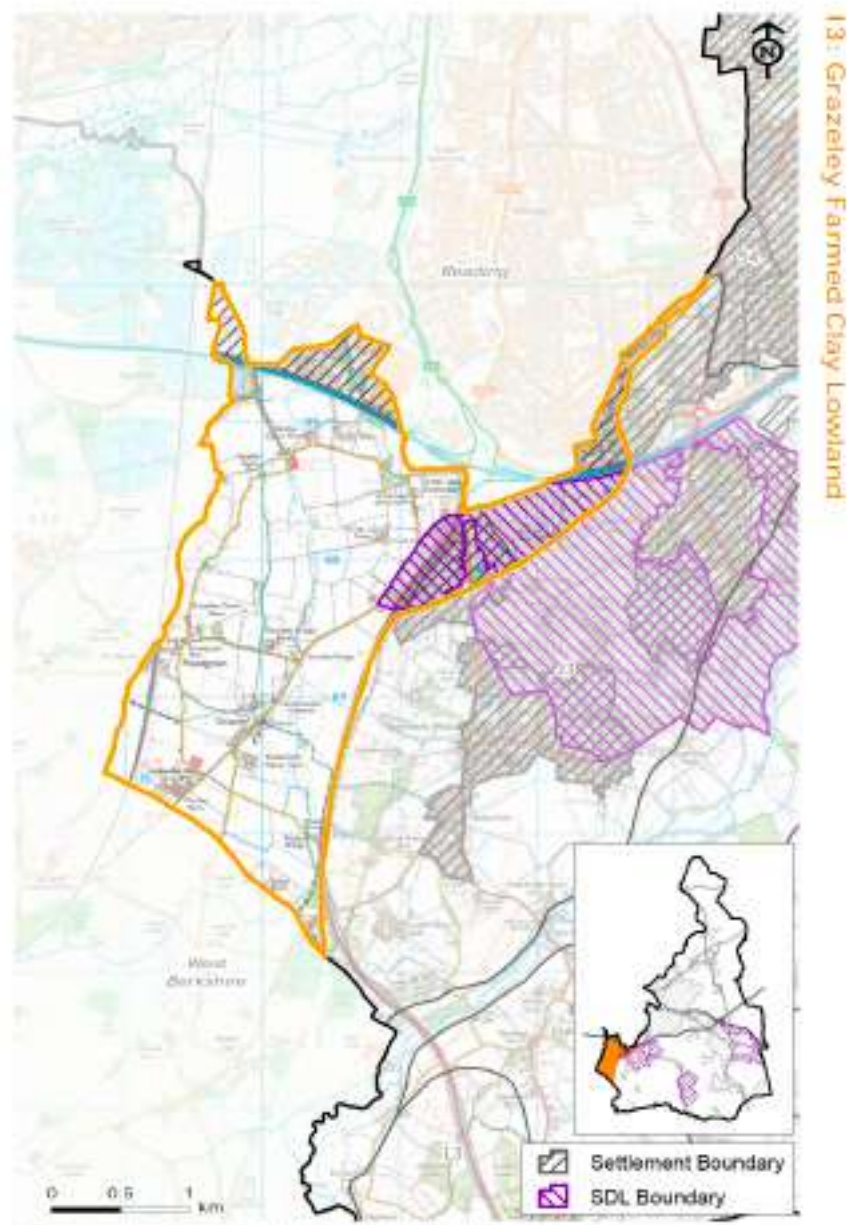
Conclusion

The site provides safe and suitable realistic opportunities for the site occupants to access alternative modes of sustainable travel within a short distance.

The site is highly sustainable when a realistic and practical approach considering the rural nature of the site is applied, following the Holistic approach that is adopted by Inspectors in appeals, as we have evidenced.

Character and Appearance

Wokingham Borough Council Landscape Character Assessment - Area I3



Character Area I3: Grazeley Farmed Clay Lowland

SUMMARY

A flat agricultural landscape of predominantly large arable fields with occasional sheep grazing. The area is drained by numerous streams and ditches including the tranquil course of the Foudry Brook, overhung by mature trees. A highly rural, even remote, landscape characterised by low density dispersed settlement, connected by sunken lanes with hedge banks. The north of the area is disturbed by modern development on the edge of Reading and the M4.

The Grazeley Farmed Clay Lowland character area lies in the far west of the borough and forms part of the wider landscape of the Thames Basin. The southern and western boundaries are marked by the borough boundary, although the character extends into West Berkshire. The eastern boundary is defined by a change in topography where the prominent clay ridge of I3: Spencers Wood Settled and Farmed Clay separates this area from the Loddon Valley. The A33 runs along the foot of this ridge and is used as a pragmatic boundary. The northern boundary is also marked by the borough boundary and the built up area of Reading.

Key Characteristics

- **Flat vale landscape** lying at 40 to 50m AOD, enclosed to the east by the prominent clay ridge of Spencer's Wood. Underlain by London Clay and alluvium associated with the River Kennet and its tributaries – part of the wider Thames Basin.
- **Wetland character** in parts due to drainage ditches and small streams which flow north towards the Kennet, including the Foundry Brook, a medium sized stream only visible at close range. Field ponds are also a feature of this area, including Great Lea Pond LWS.
- **Largely devoid of woodland with only shelterbelts and small mixed farm woods**, with BAP priority habitat mixed lowland deciduous woodland. Norman's Shaw and Wood North of Beech Hill Coverts/Clayhill are of ancient origin and are designated as LWS.
- **Large-scale irregular arable fields in the open vale contrast with small scale sheep pasture fields on the edge of settlements** some of which now support horse paddocks. The area includes intact 19th century field patterns in the south and small areas of ancient field systems adjacent to the M4.
- **Low thorn hedgerows and hedgebanks enclose the fields**, with post and wire fences where hedgerows are discontinuous. Hedgerow oaks are a feature of field boundaries with remnant lines marking former field boundaries.
- **Remnant parkland** around the 18th and 19th century country houses at Grazeley Court Farm and Hartley Court (Grade II* listed).
- **Low density scattered rural farmsteads and nucleated hamlets** e.g. Grazeley and Poundgreen. The built form is characterised by timber frame, polychromatic Reading brick and thatch with weatherboarding. Many of the farmhouses are Grade II listed. There are a number of Victorian houses in polychromatic Reading brick, including at Three Mile Cross, in the north of the area, which has been extended as part of the South of the M4 SDL.
- **The GHQ Stop Line** (General Headquarters Line), a defensive zone built during the summer of 1940 to contain the threatened German invasion included a section along the Foundry Brook.
- **A network of sinuous single-lane tracks shaded by hedgerows and hedgerow trees** link the settlements. Drainage ditches and remnant wayside commons, now only visible as wide grass verges, line the lanes.
- **Transport corridors including the A33, M4 and Great Western Railway** on the periphery of the area introduce noise and movement.
- **Urban fringe land uses close to Reading and the M4** include paddocks and Mereok Park and Ride with larger scale development north of the M4, including Green Park business park. Some agricultural buildings have been converted into small rural business parks e.g. Grazeley Bridge Farm.
- **Glimpsed views of Reading urban fringe** including Green Park Business Park and a wind turbine north of the M4 **contrast with enclosed views along lanes and roads** created by mature trees and thick hedgerows.
- **Strongly rural agricultural landscape, which is tranquil** away from the urban fringe and major transport corridors. The M4 and Reading urban fringe negatively impact on the tranquility. The urban glare makes Reading particularly prominent at night but limited development in the south results in dark night skies.

- 13.10 This is a highly rural landscape characterised by low density, dispersed settlement of scattered farmsteads, many of which are Grade II listed, and hamlets at Grazeley and Poundgreen. These hamlets are typically nucleated and have retained their rural character. The traditional built form is distinctive for historic timber framed buildings, half-tipped roofs and use of traditional polychromatic Reading brick with weatherboarding on agricultural buildings. The use of clay tiles, along with the soft red brick, also adds warmth to the landscape. Thatch is also a feature of this area, reflecting its association with the Kennet and proximity to reed beds.
- 13.11 Modern development has extended Three Mile Cross further into this character area as part of the South of the M4 SDL (predominantly within J3: Spencer's Wood Settled and Farmed Clay). There is no modern vernacular, although brick is the most common material.
- 13.12 Farmsteads and hamlets are linked by a network of ancient winding sinuous lanes, lined by hedgebanks and shaded by oaks. Drainage ditches are often located either side of these rural lanes and the remnant wayside commons are visible as wide grass verges with mature oaks.
- 13.13 There is increasing traffic on the minor roads, in part due to the construction of Mereok Park and Ride south of Great Lea Common. This has led to the creation of informal passing points and the erosion of traditional grass verges.
- 13.14 The pattern of small lanes linking the farmsteads has been overlain by more recent communication routes such as the mid-19th century Great Western Railway line between Reading and Basingstoke, the A33 trunk road west of Spencer's Wood (forming the eastern boundary of the area), and the M4 motorway. However, there are no junctions or access from the railway line or M4 within this area. During the Second World War, a series of pillboxes were built to support defences all along the Foundry Brook as part of the defensive GHQ Stop Line, designed to hold up armoured German invasion forces, which ran from Bristol to Maidstone and thence from Maidstone to the Wash.
- 13.15 There are limited rights of way in this landscape, and the area remains a working agricultural landscape with little recreational activity. Closer to the M4 plots become fragmented, urban fringe land uses such as factory sites and paddocks increase, and fly tipping is evident. There has been farm diversification with agricultural buildings converted into small business parks e.g. Grazeley Bridge Farm.

Perceptual Landscape

- 13.16 The A33 dual carriageway runs along the eastern boundary of the area and the M4 crosses east to west with a major road junction located just beyond Wokingham's administrative boundary introducing noise and movement into the character area. There are glimpsed views of the Reading urban fringe, including the Green Park business park and wind turbine on the northern fringe of the area.
- 13.17 Away from these major transport corridors the area retains a rural and enclosed character, with views contained by hedgerows and mature standard oaks along the rural lanes. The area is tranquil with dark night skies. Despite busy transport corridors, there is little accessibility into and within the area, leading to a sense of remoteness.

Valuable Landscape Attributes

- **Rural character of the working agricultural landscape** with its mix of large arable fields and smaller areas of pasture bound by thorn hedges and banks with characteristic hedgerow oaks.
- **Hidden wetland character of the network of drainage ditches, ponds and small streams**, including the Foudry Brook adds visual diversity and important ecological habitats.
- **Remnant historic field patterns**, both in the south of the area (19th century regular enclosure) and to the east of Three Mile Cross (ancient field system defined by hedgerows and hedgerow oaks).
- **Scattered settlement pattern** of farm and rural hamlets. Time-depth is provided by the Grade II listed farm buildings.
- **The Second World War GHQ Stop Line** which follows the course of the Foudry Brook.
- **Winding sunken lanes enclosed by hedgerows with mature hedgerow trees** and historic grassy verges provide a sense of enclosure and scenic quality.
- **Strongly rural and remote landscape character** due to scarcity of settlement and relative inaccessibility which results in a sense of tranquility and dark night skies.

Landscape Condition

The distinctive flat landform, mixed working farmland with neatly clipped hedges and rural settlement pattern linked by winding rural lanes are in a **good condition**.

The presence of major transport corridors on the periphery of the area disturbs the rural and tranquil character of the landscape. The proximity of Reading and the development of the South of the M4 SDL have introduced adjoining marginal land uses. The rural roads are increasingly busy, and informal passing points have been created eroding roadside verges. The remnant wayside commons and wetland and woodland habitats would benefit from enhanced management.

Key Issues

- Effects on tree health or species composition of woodland and wet woodland as a consequence of pathogens and climate change. Climate change is also likely to result in increased seasonal variation in river flows.
- Hedgerow loss and soil erosion associated with the expansion of fields and intensification of agriculture.
- Past use of fertilisers and pesticides resulted in a polluted run-off affecting water quality and biodiversity, although in more recent years there has been an improvement in water quality.
- Presence of marginal agricultural land, which is of poor visual character, being kept in 'hope' value, particularly around settlement edges and on the urban fringe.
- Pressure for horse/pony paddocks, particularly at settlement edges leading to a decrease in rural intactness.
- Drainage operations have resulted in loss of wetland habitats. This threat continues as a result of drainage schemes associated with new building works and agriculture.
- Lack of the recruitment of young trees (through natural regeneration or planting) required to rebalance the age structure of parkland and hedgerow trees is an on-going threat to the character of the landscape.
- Pressure for expansion, infill and densification within existing settlements, including expansion of Three Mile Cross into the area as part of the South of the M4 SDL impacting the rural character of the area. There may also be pressure from planned strategic scale development in the area south of the M4 and west of the A33, in the area around Grazeley.
- Pressure for new industrial developments, sewage treatment works and commercial premises, particularly associated with the major transport corridors and Reading fringes.
- Demand for large-scale agricultural buildings leading to visual intrusion of these elements.
- Increasing transport pressures on rural roads as a result of traffic taking diversions to avoid delays in the urban areas leading to loss of tranquillity, erosion of road verges and increased levels of air pollution in rural areas. Demands for upgrading the winding network of rural lanes with new signage, line painting and widening threatens the intimate rural character of the lanes.
- There is continuing pressure for new roads or additional lanes on existing roads, particularly due to the proximity to Reading, leading to further visual intrusion of transport corridors and fragmentation of the landscape.
- This character area contains a reservoir of 'dark skies' to the south of the area. Light pollution, particularly along transport corridors and on settlement edges is a key issue affecting the night landscape.
- Decline or decay of the historic and archaeological features of the GHQ Stop Line.

The Site

The application site retains the strong roadside hedging (with the exception of the proposed pedestrian access) and is introducing clipped inner boundary hedging. It is not seen as part of the wider farmed and open agricultural fields, it is very much visual read as part of the space existing residential development in this area.

There will be significant planting introduced to the site as a result of the application proposal.

Landscape Strategy

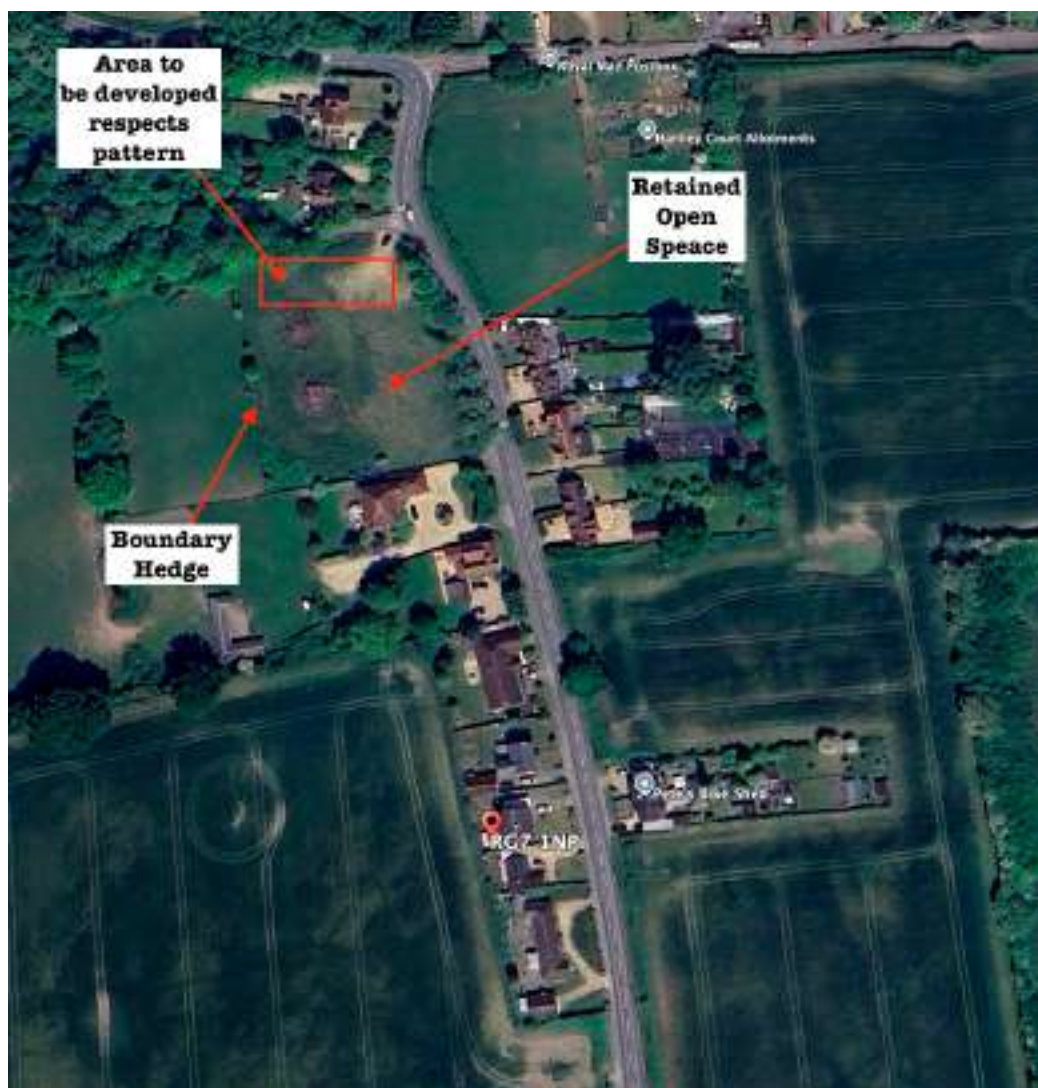
To maintain the landscape character of the *Grazeley Farmed Clay Lowland* the following strategy is required; to conserve and enhance the strong rural character of the open agricultural landscape with its dispersed settlement pattern of historic farmsteads and hamlets linked by winding lanes.

The key aspects to be enhanced and actively managed are the pattern of hedgerows, ancient or mature oaks, wayside commons and rural lanes. The GHQ Stop Line is also a key attribute to be conserved and enhanced. There is an opportunity for woodland planting to integrate the motorway, busy A roads and urban fringes of Reading and Shinfield.

In terms of development, the aim is conserve the rural setting and gaps between settlements and maintain the integrity of settlement identity.

Landscape Guidelines

- **Conserve the open and rural qualities of the farmed landscape.** Manage and enhance the wildlife interest of agricultural fields by encouraging the creation of uncultivated field margins and other wildlife-friendly farming methods around intensively farmed arable fields.
- **Conserve, enhance and manage hedgerows with standard trees** as important wildlife habitats and landscape features, as well as the links they provide across the landscape and between areas of woodland. Reinstall or repair hedgerows with native species where there are opportunities to do so. Plan for the next generation of hedgerow trees with a programme of tree planting.





The site is not visible looking back across the fields from Hartley Court Road



There are no Public Footpaths or Rights of Way which are provided with any inward views of the site or which are negatively affected by the proposed development. All views of the site are restrained to the road which directly passes the front of the site and predominately to the entrance way and the proposed pedestrian access.

Existing Caravan Site

The MereOak caravan park is located in the nearby vicinity.



The caravan site is located 220meters from the application site

The M4 Motorway is 314 meters from the application site



The park and ride is located 447mtrs from the application site

Planning Policy for Traveller Sites (PPTS)

Section 27 of the PPTS sets out guidance in relation to landscaping;

27. When considering applications, local planning authorities should attach weight to the following matters:

- a) effective use of previously developed (brownfield), untidy or derelict land;
- b) sites being well planned or soft landscaped in such a way as to positively enhance the environment and increase its openness;
- c) promoting opportunities for healthy lifestyles, such as ensuring adequate landscaping and play areas for children; and
- d) not enclosing a site with so much hard landscaping, high walls or fences, that the impression may be given that the site and its occupants are deliberately isolated from the rest of the community.

The site is untidy land between existing residential dwellings with rear boundary treatments which contain the sites visual attributes to the pattern of existing residential development but it does introduce an area of open space via the sites entrance way.

This entrance way is to be retained and so the introduction of the static home will site alongside the neighbouring house as a pattern of development.

By introducing a new narrow width pedestrian only access, the applicants will increase inward views into the retained area of the site which will remain as grazing land.



The site is accompanied by a indicative landscaping plan but the applicants will accept a prior to commencement enhanced landscaping planning condition, covering both soft and hard landscaping.

Section 28 of the PPTS is relevant to the proposal following the finding that the LPA are unable to demonstrate and up to date 5 year supply of deliverable sites.

The site proposal accords with the aims of the PPTs and does not conflict with the pattern of development or the Landscape and Character assessment aims.

Further enhancements can be secured by planning condition in relation to the external finishes and treatments of the structures together with any lighting and boundary treatments.

A typical example of an enhanced landscaping plan following the imposition of a landscaping condition



External Finishes

The following 2 CGI images show how static homes can be finished which softens the external appearance and assists them to blend within the surroundings.



By way of an example, static caravans can be finished in numerous forms and ways, as they are defined as caravans by only a narrow set of criteria in legislation, I offer some examples of different caravans that meet the definition on the coming pages.







All of the provided images are of structures which are static caravans and meet the definition as set out within the act, finished in varying styles and finishes of high quality which can significantly assist a property with assimilation into the existing street scene.

Neighbouring Property



This property is located a few doors long the street from the application site and is a single low level form, next to a traditional Victorian cottage.



Directly opposite the site are a series of matching traditional style cottages in red brick.



Next door is a substantial modern property with traditional elements in the facade.



Summary

There are a number of significant variations to the existing built form in and around the immediate area of the application site, with an overriding theme of traditional building materials and finishes.

There is a significant caravan site nearby that is visually open and inward sites are available.

The modern office blocks of the industrial area of Reading on the opposite side of the M4 are visible in the local context.

The introduction of a contained form of development within a small section of the site retains a significant open form in the pattern of development which aligns with the how the area is presently experienced.

With the use of appropriate planning conditions to secure high quality landscaping and finishes, the site is capable of delivering a physical and visual sympathetic development to meet the needs of the applicant family.



Traditional red brick finishes with painted windows taking their design queues from the existing street scene.



The brick finish colour can be changed to match varying street scenes



Culturally Appropriate Accommodation

If we are designing a structure to look like a conventional house, why not just build a conventional bricks and mortar house?

The Annexe 1 Definition recognises that the nomadic lifestyle is highly aligned with a tradition of living in caravans, this engrains certain habits and familiarity over many years that brings a comfort and identity. Many Gypsy and Traveller families have explained they suffer depression and other medical issues from living in traditional housing stock.

Architectural Features



Even hipped roof details are achievable in caravans as can be seen in the image below which follows the design pattern of the neighbouring bungalow.

This roof height would comply with the caravan definition within the Act. There is no reason at all to accept that a static caravan is going to have a negative impact to an area and it is perfectly acceptable to require a caravan to reach an acceptable standard of external finish to achieve good design in sensitive areas.



Caravan Definition

13

Two-unit caravans.

- (1) A structure designed or adapted for human habitation which—
- (a) is composed of not more than two sections separately constructed and designed to be assembled on a site by means of bolts, clamps or other devices; and
 - (b) is, when assembled, physically capable of being moved by road from one place to another (whether by being towed, or by being transported on a motor vehicle or trailer),
- shall not be treated as not being (or as not having been) a caravan within the meaning of Part I of the **M1** Caravan Sites and Control of Development Act 1960 by reason only that it cannot lawfully be so moved on a **F1** highway **F1** road when assembled.
- (2) For the purposes of Part I of the Caravan Sites and Control of Development Act 1960, the expression "caravan" shall not include a structure designed or adapted for human habitation which falls within paragraphs (a) and (b) of the foregoing subsection if its dimensions when assembled exceed any of the following limits, namely—
- (a) length (exclusive of any drawbar): **F2** 65.616 feet (**F3** 20 metres);
 - (b) width: **F4** 22.309 feet (**F5** 6.8 metres);
 - (c) overall height of living accommodation (measured internally from the floor at the lowest level to the ceiling at the highest level): **F6** 10.008 feet (**F7** 3.05 metres).

Conclusion

The change in use of part of the site to a caravan site introduces a degree of residential adverse impact through the introduction of a use and associated paraphernalia, but this is judged to be limited in nature, that can be further mitigated with a high quality development that delivers a finish that aligns with the local vernacular.

The proposed layout and use of the site follows the existing pattern of development and neighbouring uses whilst respecting the aims of the PPTS.

I can find no reason to justify a refusal based upon impacts to the character and appearance of the area being negatively impacted as a result of the proposal.

The use of planning conditions to bring forward the development to meet the needs of the applicants and to assist with meeting the short fall in the Councils statutory obligations is acceptable and has significant wider benefits.

28. If a local planning authority cannot demonstrate an up-to-date 5 year supply of deliverable sites, the provisions in paragraph 11(d) of the National Planning Policy Framework apply. Local planning authorities should consider how they could overcome planning objections to particular proposals using planning conditions or planning obligations including:

Atomic Weapons Establishment Radiological Impact Assessment - Document Submission Ref: PD15

The applicants instructed the specialist advice of Mike Thorne Associate Limited, which is run by Mr Mike Thorne, BSc PhD FInstP FSRP CradP, a leading specialist in nuclear establishments and the associated risks. The document looks at risks from a potential fall out at AWE.

The 58 page document is submitted in full for the councils consideration and consultee assessment, with the executive summary commencing on page 3.

MTA/P2095/2023-1: Issue 1.0

Executive Summary

- E.1 This report supports a planning application for the emplacement of one family Residential Gypsy and Traveller pitch consisting of two static caravans and construction of a dayroom suitable for use as a shelter in the event of a radiological incident at AWE Burghfield on land adjacent to Leaffields House, Great Lea, Three Mile Cross, Reading, RG7 1NP, in respect of the location of the application site within the boundary of the Detailed Emergency Planning Zone – DEPZ for AWE Burghfield.
- E.2 It is demonstrated that the effective dose of radiation that might be received by a resident as a result of the accident described in the AWE Burghfield consequences report is about 1.3 mSv (which is only slightly more than the limit on annual effective dose to a member of the public from planned exposures and less than the 2.7 mSv annual effective dose received from natural background radiation), or 8.1 mSv under adverse weather conditions. Effective doses of this magnitude are described in the REPPIR guidance as 'Minor' and would not justify disruptive mitigation activities either in the short or the longer term. Sheltering alone in the dayroom building specifically designed for that purpose, if implemented rapidly enough, should be sufficient to decrease the effective dose received to less than about 1 mSv in daytime meteorological conditions. The proposed development would also be so far from AWE Burghfield that neither urgent nor subsequent evacuation would be required, even for extreme accidents; and longer-term relocation is extremely unlikely to be necessary.
- E.3 Given the distance from the site and its location on the road network there should be no adverse impact on the access of emergency services to AWE Burghfield.
- E.4 An important supplementary consideration is whether the proposed development would place an additional burden on first responders and carers in respect of dealing with medical emergencies and addressing the needs of vulnerable individuals. However, in most accident scenarios, sheltering would either not be required at the location of the proposed development (although it would be initially advised for everyone within the DEPZ) or would only be required for a few hours or, exceptionally, for up to two days. Therefore, even if visits were discouraged during the sheltering phase, this would be only a short hiatus. It is noted that the family occupying the proposed development are likely to already be resident within the DEPZ. Therefore, there would be no additional persons present within the DEPZ as a result of the proposed development, unless their existing residence became occupied by another family.
- E.5 Furthermore, the assessed effective dose rates are so low that visiting (including multiple visits) during the period of sheltering should be acceptable if considered necessary by those responsible for the OSEP for the well-being of a resident. In this context, it would be important to emphasise to carers and other responders that entry into areas with low levels of radioactive contamination would not pose a threat to their health. This is a general aspect of their training and does not have any specific implications for the acceptability of the proposed development.

- E.6 If residents of the proposed development decided to relocate following an accident at AWE Burghfield, it would be their choice and would primarily be to dispel their own anxiety and not to avert effective dose.
- E.7 Overall, whilst the location of the proposed development within the DEPZ of AWE Burghfield is a material planning consideration, the low probability of exposure and the low consequences of any reasonably foreseeable exposure suggest that this is a consideration that should be given little weight when determining the overall planning balance in respect of the proposed development.
- E.8 Furthermore, the application proposal has no material impact on the resources required in the event of implementation of the off-site emergency plan for AWE Burghfield; and can therefore be safely accommodated under that plan having regard to the needs of the emergency services and other parties involved in implementing or responding to that plan. This means that the application proposal complies with MDD Policy TB04. Furthermore, it means that implementation of the proposed development would not have any potential to render the off-site emergency plan inadequate. In turn, this implies that implementation of the proposed development has no potential to adversely impact operations at AWE Aldermaston. This is important, because continued operation of AWE Burghfield is an essential input to maintaining the UK Continuous At Sea Deterrent (CASD).

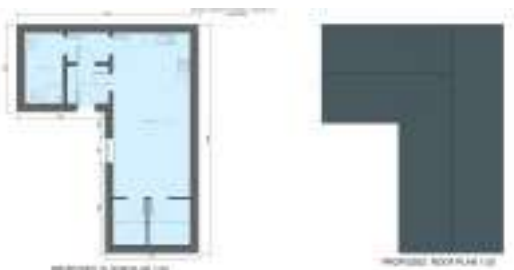
The applicants professional evidence is that the development proposal does not cause conflict or introduce adverse connotations for the future viability of the AWE or for the occupiers of the site.

It is worthy to note that the applicants currently live within the immediate vicinity of the application site in caravans at their parents property, the reason for moving is disclosed with the personal circumstances document, **Document Submission Ref: PD16**

Day Room

The day room is designed, including a air lock entry system, so that persons can seek shelter and refuge during an emergency fall out scenario for the required duration of the standing advice to remain in place.

The facility contains enough space and storage for provisions for this emergency scenario which removes pressure from emergency services being required to evacuate residents.



We can guarantee that the occupants will be safe from the effects of radiation during a reasonably foreseeable radiation emergency at AWE(A).

As for the day rooms that will be used for the AWE Shelters the proposed attributes are summarised as:

1. Airtight – to reduce the air exchange with the outside world while a radioactive plume drifts by.
2. Reasonably big – they may have to be there for up to 48 hours so it has to be a suitable size – it doesn't have to be "comfortable" since it'll be used less than once in 10,000 years.
3. Have toilet facilities
4. Have sufficient potable water for 48 hours (either running water or bottled water)
5. Have enough food for 48 hours
6. Have decontamination supplies (Blue wipes, wet wipes, plastic bags and spare clothes)

Planning Balance

The Council accept that are unable to demonstrate an up to date 5 year supply of deliverable sites and under Section 28 of the Planning Policy for Traveller Sites, this brings in to play 2 important considerations, the first being the use of planning conditions to bring forward otherwise unacceptable development and also Para 11 d) of the National Planning Policy Framework (NPPF) The presumption in favour of sustainable development, commonly referred to as the Tilted Balance, meaning the starting point is favoured to approval, unless there are strong, significant or demonstrable reasons to prevent doing so.

28. If a local planning authority cannot demonstrate an up-to-date 5 year supply of deliverable sites, the provisions in paragraph 11(d) of the National Planning Policy Framework apply. Local planning authorities should consider how they could overcome planning objections to particular proposals using planning conditions or planning obligations including:

The presumption in favour of sustainable development does not automatically disapply the development plan. It sets out within Section 38(6) of the Planning and Compulsory Purchase Act 2004, that decisions are still required to be made in accordance with the development plan, unless material considerations indicate otherwise.

The question which arises to be considered is whether the policy TB10, positively assists with bringing forward development to meet the shortfall or whether it is operating to restrict delivery where there is a known and identified shortfall.

Policy TB10: Traveller Sites

1. Planning permission may be granted for new gypsy and traveller pitches or travelling showpeople plots or extensions to existing sites where it can be demonstrated that:
 - a) The site is located in the Borough's existing settlements or is adjacent to an existing settlement either within or adjacent to the Borough

The average house costs within Wokingham Council's area is reported as £486,000.00 significantly higher than the national average of £270,000.00. This places huge demand and high asking prices on land that is located within settlement boundaries or directly adjacent to it.

Policy TB10 is in large part in principle acceptable in its wording to assist in bringing forward development, however a) places a tight and restrictive requirement which goes upon the National Planning Policy Framework and the Planning Policy for Traveller Sites, which clearly sets out that development in the Countryside is acceptable, and not just those developments within or adjacent to settlement boundaries.

Weight

The policy TB10 is considered to be out of date and represent an unacceptable barrier to bringing forward development to meet the identified needs, as a result we say that no weight be given to policy TB10.

Para 11 d)

Significantly

The adverse impacts must be more than minor or moderate and must carry substantial planning weight.

An ordinary harm or a harm that can be mitigated through planning conditions should not generally be enough to reach the significantly test.

Demonstrably

The harm being clearly evidenced and capable of being shown objectively, it is not sufficient to rely upon speculation, vague concerns based on assumptions or unsupported public fears.

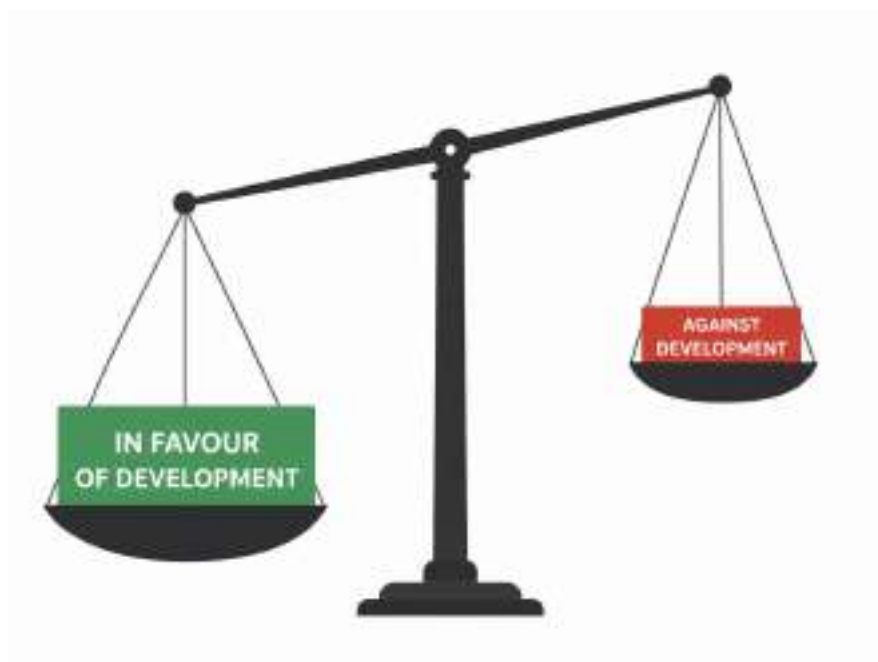
Instead there should be clear evidence such as technical reports, consultee advice and other forms of robust evidence to clearly identify and evidence the harms, being capable of being demonstrated not merely asserted.

Conclusion

The presumption in favour of sustainable development, often referred to as the tilted balance, remains engaged and applicable to this development proposal.

There are no strong or demonstrable reasons to disapply the presumption and none that outweigh the benefits of approving the application.

It is directed that planning consent with conditions, should be granted without delay.



The Final Balance

- a) The council are unable to demonstrate and up to date 5 year supply of pitches, which I apply **substantial weight**
- b) The applicants all meet the PPTS definition of Gypsies or Travellers, which attracts **significant weight**
- c) The Applicants have a longstanding history of being associated and integrated with the immediate area, to which I apply **moderate weight**
- d) The Para 28 of the PPTS is engaged, and the use of planning conditions should be used to bring forward otherwise previously unacceptable development I apply **substantial weight**
- e) The lack of a 5 year supply of sites engages Para 11(d) 'tilted balance' The presumption in favour of sustainable development, I apply **substantial weight**
- f) The site is sustainably located, considering the site specific details and the proposed type of development within the countryside, I apply **moderate weight**
- g) There are article 8 best interest of the child, I apply **substantial weight**
- h) No alternative or available sites available, I apply **substantial weight**
- i) The likely location of new sites within the District being in countryside or National Landscape locations, and the inevitability for new sites to be located outside of settlement boundaries. I consider that **moderate weight** should be afforded to the likely location of new sites, and the protection against this sites consent would give to those protected areas.
- J) Planning conditions can be effectively used to secure the final details the Council require, I apply **significant weight**

Granting the Application

It is submitted that the LPA will consider 3 suitable options should they be minded to grant planning permission,

Option 1: Permanent Non-Personal Permission – The Council imposes a PPTS restricted Gypsy/ Traveller occupation condition on any grant of planning permission for the development. This would enable the development to contribute to the supply of the Councils Cultural and PPTS allocations, and occupied only by Gypsies and Travellers of Nomadic habits.

Option 2: Personal Permission – The Council imposes a condition requiring the cessation of the use and restoration of the land should the site cease to be occupied by the applicants, and their resident dependents. This would not enable the site to contribute to supply, but would address the personal needs of the applicants.

Option 3: Temporary Permission – In light of the personal circumstances of the appellant, and the absence of any available alternative sites, and the best interests of the children, the Council imposes a time restrictive condition setting out that the use of the site will cease in 5 years, or when the site cease to be occupied by the applicants, and their resident dependents, whichever happens sooner. This would provide much needed time for the applicants to consider alternative sites, and for the LPA to work towards making additional provision as is required.

We believe in this instance that option 1 is the most appropriate for the submission.

Suggested Planning Conditions

As set out within this document, the Government has made expressly clear their intended direction of travel with regard to bringing forward all kinds of development, and as set out, Para 28 of the PPTS is clear that development which would otherwise be unacceptable, that can be made acceptable by planning condition, should be conditioned.

The applicant is prepared to accept conditions on the following matters and happy to consider any other matter should they arise during the consultation period/process;

Landscaping - Soft and Hard

Mandatory Bio Diversity Net Gain and ecology precautionary working practices and further surveys prior to any further works being undertaken

External Finishes

Personal Consent and Gypsy/Traveller restriction if necessary

Lighting Details for ecology protection and bat and bird boxes

Drainage and Foul Water Details prior to commencement of any further works