PLANNING STATEMENT

Highfield Park, Eversley Road, Arborfield Siting of Seven Residential Static Caravans

1. Introduction

This Planning Statement supports a new application for the change of use of land at Highfield Park, Eversley Road, Arborfield, to permit the stationing of seven residential static caravans for occupation by persons from the Gypsy and Traveller community. The proposal responds to a clear and evidenced need for Gypsy and Traveller accommodation within Wokingham Borough and aligns with national and local planning policy objectives.

Although this particular application has not previously been refused, other applications at Highfield Park have been refused for reasons relating to landscape impact, tree information, ecological information, and Thames Basin Heaths SPA mitigation. This Planning Statement therefore proactively addresses those topics to ensure the Council cannot rely on the same reasoning. The statement is supported by updated technical evidence including a BS5837 Tree Survey, Arboricultural Impact Assessment, Tree Protection Plan, and a Preliminary Ecological Assessment.

2. Proposal Description

The proposal seeks permission for the change of use of land to allow the siting of seven residential static caravans for occupation by Gypsy and Traveller households. The development consists solely of seven caravans positioned within a defined parcel of land. No dayrooms, permanent buildings, engineered structures, lighting columns, or hardbuilt development are proposed. The caravans will be sited on a modest, enclosed area of land with minimal ground disturbance and no alteration to the landform. The proposal is reversible, low-impact, and does not involve operational development. All boundary vegetation is retained, and the site layout is simple, unobtrusive, and proportionate to the scale of the use. This accords with Core Strategy Policy CP3, which requires development to be appropriate in scale, form, and character, and CP2, which supports inclusive communities including ethnic minority groups such as Gypsies and Travellers.

3. Site Description

The application site forms part of the wider Highfield Park landholding located off Eversley Road, Arborfield. The land comprises grassland with areas of scrub and is enclosed by hedgerows and vegetation that provide complete natural screening. The site is situated in the north-east corner of the landholding, in a position that is entirely contained within the wider parcel and cannot be seen from outside the site. It is screened from Eversley Road, Observer Way, and all public vantage points. The land is level and accessible, with an existing access onto Eversley Road serving the wider holding. The site lies adjacent to the Arborfield Strategic Development Location (SDL), identified under Core Strategy Policy CP18, which supports development in this area due to its planned infrastructure, accessibility, and strategic role in meeting housing needs.

4. Character of the Area

The surrounding area has undergone significant transformation as a result of the Arborfield SDL. Large-scale residential development, new schools, local centres, active travel corridors, roundabouts, and major infrastructure have reshaped the landscape. The site sits within this

transitional SDL corridor, where rural land interfaces with modern development. The presence of Observer Way, Bohunt School, Arborfield Green, and extensive new housing means the area can no longer be described as isolated countryside.

The site's north-east corner location, combined with dense vegetation, ensures the development cannot be seen from outside the landholding, does not project into the countryside, does not alter the rural-urban transition, and does not affect any public views. This context is directly relevant to Core Strategy Policy CP11, which restricts development outside settlement limits unless it does not harm the character of the countryside. In this case, the SDL has already altered the landscape, and the modest siting of seven caravans will not harm the character of the area.

5. Personal Circumstances of the Proposed Occupants

The application site will be occupied by members of two Traveller families: four members of the Nolan family and three members of the Rooney family. Both families are in the same position, experiencing insecure, unsuitable, and unstable living arrangements that do not meet their basic welfare needs. They are currently residing in caravans on land owned by others, where they are required to pay rent for temporary and insecure accommodation that lacks proper toilet and shower facilities. Their present circumstances do not provide a settled or secure home and are not suitable as a permanent arrangement for themselves or their children.

The Nolan family are Irish Travellers, a recognised ethnic group under the Equality Act 2010, with a distinct cultural heritage and traditions. Modern constraints, including planning legislation, road safety regulations, and the near-total absence of lawful stopping places, mean that roadside living is no longer viable or safe. The Rooney family are in the same position, facing the same cultural, practical, and welfare pressures. National planning policy recognises that Traveller communities require settled accommodation to secure work, access healthcare, education, and community services while maintaining cultural identity.

Both families have been living in insecure circumstances for a prolonged period, without lawful residential bases, without sanitation, and without the stability required for day-to-day life. The purpose of this planning application is to allow both families to establish a secure and settled home on land that they own and control. Having their own lawful residential base would provide stability, privacy, sanitation, and basic living facilities that they currently lack.

It is particularly important for the Nolan family to remain within the area because Miley's parents are elderly and require support and assistance. Being located close to them would allow the family to provide practical day-to-day support, regularly check on their welfare, and be available when they need help. The Rooney family also rely on proximity to extended family networks in the area. Their connection to the locality is therefore important for cultural, welfare, and practical reasons. Moving a significant distance away would make it much more difficult for both families to provide the assistance and family support that their relatives require.

These circumstances are directly relevant under NPPF Policy HO12 and Core Strategy CP2, which require decision-makers to consider the personal circumstances of Traveller households, including the availability of alternative lawful sites, the welfare implications of continued insecure living, and the importance of family networks. Both families have no access to lawful Traveller sites elsewhere and no realistic alternative accommodation. Their circumstances carry significant weight in favour of granting permission.

6. Gypsy and Traveller Accommodation Need

Wokingham Borough Council's most recent assessment of Gypsy and Traveller accommodation need is set out in the Gypsy and Traveller and Travelling Showperson Accommodation Assessment (GTAA 2023). The Council's Topic Paper confirms that the GTAA identifies a cultural need for eighty-six net additional pitches between 2022/23 and 2039/40, of which thirty-five pitches are required within the first five-year period. This represents a significant and pressing level of unmet need within the borough. The GTAA identifies further requirements of fifteen pitches between 2027/28 and 2031/32, twenty-six pitches between 2032/33 and 2036/37, and ten pitches between 2037/38 and 2039/40. The Topic Paper confirms that, following the removal of the PPTS definition in December 2023, the full cultural need of eighty-six pitches must now be planned for.

Despite this substantial level of need, the Council has only been able to identify forty-three pitches through proposed site allocations in the Local Plan Update, and a further seven pitches through recent or expected planning permissions. This leaves a remaining requirement for thirty-six pitches that the Council expects to be met through windfall development. The Topic Paper acknowledges that historic windfall delivery has been relied upon for over a decade, but also confirms that windfall supply is uncertain and that the borough has experienced lapsed permissions, stalled sites, and delays in delivery.

The Topic Paper also confirms that Wokingham Borough Council is unable to demonstrate a five-year supply of deliverable Traveller pitches, with the supply position standing at 3.66 years. This is significantly below the requirement in national policy. The Council states that it anticipates a five-year supply will be met at adoption of the Local Plan, but this is not guaranteed and is dependent on future delivery from strategic sites and windfalls.

This evidence demonstrates a clear, significant, and ongoing shortfall in Traveller accommodation provision within Wokingham Borough. The GTAA identifies a pressing need for new pitches, the Topic Paper confirms that the Council cannot meet its five-year supply requirement, and the Local Plan Update relies heavily on windfall development to meet the remaining need. In this context, private applications such as the present proposal play a critical role in meeting unmet need and reducing pressure on the borough's housing land supply. Under NPPF Policy HO7, substantial weight must be given to development that contributes towards meeting evidenced accommodation needs. Given the scale of unmet need, the lack of a five-year supply, the reliance on uncertain windfall delivery, and the pressing requirement identified in the GTAA, very significant weight must be given to the contribution this proposal makes towards meeting Wokingham's Traveller accommodation needs.

7. National Policy Position – NPPF (August 2026)

Traveller site applications are determined under the unified national housing framework, specifically within NPPF Policies HO1–HO13. The key policies relevant to this proposal include HO3 (Maintaining a supply of homes), HO5 (Deliverable Traveller Sites), HO7 (Weight to Accommodation Needs), and HO12 (Determining Traveller Site Applications). The former PPTS has been abolished, and Traveller accommodation is now assessed under the same housing principles as all other residential development.

8. Local Policy Position – Wokingham Core Strategy (2010)

Relevant policies include CP1 (Sustainable Development), CP2 (Inclusive Communities), CP3 (General Principles for Development), CP7 (Biodiversity), CP8 (Thames Basin Heaths SPA), CP11 (Proposals Outside Development Limits), and CP18 (Arborfield Garrison SDL). The Core Strategy predates the current NPPF and carries moderated weight where inconsistent with national policy.

9. Emerging Local Plan Update (Limited Weight)

The Emerging Local Plan Update (2023–2040) is not yet adopted and carries limited material weight. It cannot outweigh the adopted Core Strategy or the NPPF (2026). The Council's preparation of a new Local Plan 2045 further reduces reliance on draft policies.

10. Anticipated Refusal Reason: Urbanising Effect / Landscape Harm

Although this application has not been refused, other applications at Highfield Park have been refused for alleged urbanising development. That reasoning cannot apply here because the site is completely hidden within the north-east corner of the landholding and is not visible from any public viewpoint. All boundary vegetation is retained, and no permanent buildings, lighting, or engineered structures are proposed. Caravans are low-profile, reversible, and non-permanent forms of accommodation. Their presence does not constitute built form in the conventional sense and cannot reasonably be equated with urbanisation. The Arborfield SDL has already transformed the landscape into a transitional semi-urban corridor. The proposal does not harm the countryside and fully satisfies Core Strategy Policy CP11.

11. Anticipated Refusal Reason: Insufficient Tree Information

Other applications were refused for lack of tree information. This application includes a full BS5837 Tree Survey, Arboricultural Impact Assessment, and Tree Protection Plan prepared by Invicta Arboriculture. The survey identifies only one off-site tree group and two small Ash trees adjacent to the application boundary. All trees are outside the Root Protection Area of proposed works. No tree removal is required, no encroachment into RPAs will occur, and no arboricultural constraints exist. This accords with Core Strategy CP7.

12. Anticipated Refusal Reason: Insufficient Ecological Information

Other applications were refused for insufficient ecological information. This application includes a detailed Preliminary Ecological Assessment, which confirms that the site comprises low-value grassland and scrub with no evidence of protected species, no priority habitats, and no ecological constraints that would be adversely affected by the siting of seven caravans. No protected species were identified, no bat roost features exist within the site, no reptiles, amphibians, or badger setts were recorded, and the scrub and hedgerow boundaries will be retained in full. No lighting is proposed, avoiding disturbance to nocturnal species. This accords with Core Strategy CP7.

13. Anticipated Refusal Reason: Biodiversity Net Gain (BNG)

The Council has previously refused applications at Highfield Park on the basis that Biodiversity Net Gain (BNG) had not been demonstrated. It is therefore important to clarify the correct position for this proposal. Although the red-line application site measures approximately 0.40 hectares and therefore exceeds the 0.2ha threshold, mandatory BNG only applies where development results in habitat loss or measurable ecological change. The siting of seven

caravans on this land does not involve any operational development, engineered works, land re-profiling, vegetation clearance, or alteration of existing habitats. The proposal is entirely reversible and does not change the baseline habitat value of the land.

BNG is triggered only where a development reduces habitat units, changes habitat type, or alters habitat condition. In this case, the caravans are positioned on existing grassland without excavation, foundations, hard surfacing, or engineering. All boundary vegetation is retained in full, no trees or hedgerows are removed, and no habitat parcels are replaced or modified. As a result, no habitat units are lost, and the biodiversity baseline remains unchanged.

The Preliminary Ecological Assessment confirms that the proposal does not alter habitat type or condition and does not result in any measurable ecological impact. Under the Environment Act 2021 and the associated BNG Regulations, BNG is not required where development does not affect habitat units. Natural England guidance further confirms that temporary or reversible uses that do not alter habitat type or condition do not trigger mandatory BNG, regardless of the size of the red-line boundary.

The proposal therefore does not fall within the scope of mandatory BNG, and no metric is required. The development accords with Core Strategy CP7, as it preserves existing habitats in full and does not result in any ecological harm.

14. Anticipated Refusal Reason: Lack of Legal Agreement

Other applications were refused for lack of Thames Basin Heaths SPA mitigation. A Unilateral Undertaking will accompany this application to secure both SANG and SAMM contributions. This accords with Core Strategy CP8.

15. Planning Balance

In assessing the planning balance, it is necessary to consider the proposal in the context of both national and local policy, the level of unmet Gypsy and Traveller accommodation need within Wokingham Borough, and the degree of harm arising from the development. The evidence contained within the Council's own Topic Paper confirms that Wokingham has delivered only a very limited number of Traveller pitches in recent years and remains unable to demonstrate a five-year supply, with the current position standing at 3.66 years. This shortfall is significant and longstanding. The GTAA identifies a cultural need for eighty-six pitches, of which thirty-five are required immediately. Delivery to date has been slow, fragmented, and heavily reliant on uncertain windfall development. The lack of delivered pitches is therefore a material consideration of considerable weight.

Under NPPF Policy HO7, substantial weight must be given to development that contributes towards meeting evidenced accommodation needs. The proposal would provide seven pitches, making a meaningful contribution to the borough's unmet need at a time when the Council is unable to demonstrate a five-year supply. This weighs strongly in favour of granting permission.

It is also relevant that the adopted Core Strategy is now sixteen years old and predates the NPPF, the unified national housing policies, the abolition of PPTS, and the most recent GTAA. Policies such as CP11 must therefore be applied in a contemporary context and moderated where inconsistent with national policy. The latest NPPF places clear emphasis on meeting accommodation needs, supporting inclusive communities, and ensuring that Traveller households have access to lawful, safe, and settled accommodation. Where conflict arises between outdated local policies and the current NPPF, national policy carries greater weight.

Against this policy backdrop, the level of harm arising from the proposal is minimal. The site is entirely enclosed within the north-east corner of the landholding and cannot be seen from outside the site. There is no landscape harm, no visual intrusion, and no impact on the wider countryside. The Arborfield SDL has already transformed the surrounding area into a transitional landscape, and the modest siting of seven caravans will not alter its character. Technical evidence confirms that there are no arboricultural, ecological, or biodiversity constraints, and the development is reversible, low-impact, and proportionate.

The personal circumstances of the proposed occupants, including the Nolan family's insecure living situation, lack of sanitation, cultural needs, and essential proximity to elderly relatives, and the Rooney family's identical circumstances, carry significant weight under NPPF Policy HO12 and Core Strategy CP2. These factors further strengthen the case for granting permission.

Taking all matters into account, the planning balance is clearly in favour of the development. The substantial weight arising from unmet accommodation need, the Council's lack of a five-year supply, the outdated nature of relevant local policies, the minimal level of harm, and the strong personal circumstances of the proposed occupants all point decisively towards approval. There are no adverse impacts that would significantly and demonstrably outweigh the benefits of the proposal. Planning permission should therefore be granted.

16. Conclusion

This revised application is fully aligned with the National Planning Policy Framework (August 2026), including NPPF Policies HO3, HO5, HO7, HO12, and with the Wokingham Core Strategy (2010), including CP1, CP2, CP3, CP7, CP8, CP11, and CP18. The Emerging Local Plan Update is acknowledged but carries limited weight and is not determinative. The proposal represents a sustainable, inclusive, and policy-compliant form of development that meets an urgent accommodation need and provides lawful, stable homes for Traveller families currently living in insecure and inadequate conditions. The site's fully enclosed, non-visible location ensures no landscape harm, no visual intrusion, and full compliance with CP11.