
PROOF OF EVIDENCE: PLANNING MATTERS

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

**LAND NORTH OF READING ROAD,
ARBORFIELD**

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

Prepared by: Woolf Bond Planning Ltd

On behalf of:

Dandara Southern Ltd and Elstree Land Ltd

PINS Ref: APP/X0360/W/25/3371069

LPA Ref: 243099

WBP Ref: 9015

February 2026



Woolf Bond Planning
Chartered Town Planning Consultants

CONTENTS

Appended Documents

Qualifications and Experience

1.0	Introduction and Overview	3
2.0	Description of the Appeal Site and Surrounding Area	9
3.0	Appeal Scheme Description	17
4.0	Decision Making Framework - The Development Plan and Other Material Considerations	25
5.0	Assessment of the Main Issues for Determination in this Appeal	53
6.0	Third Party Representations	88
7.0	Planning Obligations and Conditions	90
8.0	Planning Balance and Conclusions	91

APPENDED DOCUMENTS

Annex 1 – Housing Land Supply Review

Annex 2 – Local Plan Update Review

Annex 3 – Affordable Housing Review

Annex 4 – Freedom of Information Act Responses re: SANG Capacity and AH Need

Annex 5 – SANG Letter

Annex 6 – Ecology Statement Mark Rose, CSA

Annex 7 – Economic Benefits Statement

QUALIFICATIONS AND EXPERIENCE

Brigid Taylor will say:

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

I am a Director at Woolf Bond Planning Ltd, a firm of Chartered Town Planning Consultants established in the 1970s. I have been engaged in the planning and development industry for over 23 years; initially practising as a planning solicitor for a period of some nine years (2003 – 2012) before moving into planning and environmental consultancy. Since that time, I have advised and acted for a range of clients including residential house building companies, private landowners and care home developers. Examples of the range of projects I have advised on include a number of large scale edge-of-settlement greenfield development proposals across the south of England (for clients such as Taylor Wimpey, Fairfax and Croudace Homes), C2 care home proposals across the south east of England, a proposal for the comprehensive redevelopment of a brownfield former power station site in Hampshire (to create a new mixed use community of circa 1500 homes), and a number of proposals for tall buildings/mixed use development in London (including a mixed use proposal for up to 5,000 dwellings in Newham, proposals for redevelopment at Greenwich Peninsula, and proposals for redevelopment of a derelict 16ha site on the Thames in Lewisham) and Hertfordshire (Watford).

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

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

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

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

1.0 Introduction and Overview

General

- 1.1. This Proof of Evidence been prepared in support of an appeal (“the Appeal”) by Dandara Southern Ltd and Elstree Land Ltd (“the Appellant”) against the decision of Wokingham Borough Council (“the Council”) to refuse their outline application (“the Application”) for the proposed erection of up to 111 no. dwellings with associated works, parking, landscaping, publicly accessible open space and access from Reading Road (LPA Ref: 243099) (“the Application Scheme”, now “the Appeal Scheme”) on land north of Reading Road, Arborfield (“the Application Site”, now the “Appeal Site”). All matters other than access are reserved.
- 1.2. The Appellant issued a notice of an intention to submit an appeal to PINS and the Council on 10 July 2025 and the Appeal was submitted on 14 August 2025. At the point of submission, the Appellant sought that the Appeal be determined via the Inquiry procedure; the Statement of Case submitted on that date was prepared on that basis. The Planning Inspectorate subsequently advised that the Appeal would be determined via hearing. As a result, and following confirmation from the Inspectorate, the Appellant submitted additional information in the form of Proofs of Evidence in support of its Statement of Case, within the 6-month appeal submission timeframe (November 2025). These Proofs addressed highways, arboriculture, landscape, housing land supply and affordable housing need, and planning matters.
- 1.3. Upon appointment of the Inspector to determine this Appeal, it was confirmed that the Appeal would be heard via public inquiry rather than hearing. In accordance with the Start Letter (CD22.01) and Case Management Conference notes, the Appellant now submits Updated Proofs of Evidence in support of its case. These Updated Proofs have been prepared following receipt of the LPA’s Statement of Case. As such, my earlier November 2025 Proof of Evidence on Planning Matters (CD13.01) is substituted with this Updated Proof. Housing Land Supply and Affordable Housing Needs matters,

formerly addressed in the proof of evidence of Mr Graham Ritchie (CD13.05) are now the subject to Annexes to this Proof and a Statement of a Common Ground on these matters (CD05.03) has been agreed with the Council. The parties are in broad agreement on the scale of the shortfall (2.3 -2.5 years) and that the difference between them would not require detailed evidence.

- 1.4. This Proof of Evidence should be read alongside the Proofs of Evidence of Mr Matthew Stevens (on highways and accessibility matters), Mrs Clare Brockhurst (on landscape and visual impact matters), Mr Terry Seymour (on flood risk and drainage) and Mr Peter Ruskins (on arboriculture).
- 1.5. The initial Statement of Case (CD04.02) was accompanied by a draft Statement of Common Ground ("SoCG") (CD05.01). Following issue of the LPA's Statement of Case an Overarching SOCG has now been agreed between the Appellant and LPA and submitted to the inspectorate on 23.01.26 (CD05.02). That overarching SOCG replaces and supersedes the earlier draft at CD05.01. Additional topic based SOCGs have been prepared addressing landscape (CD05.04), highways (CD05.05), arboriculture (CD05.06), flood risk and drainage (CD05.07) and ecology (CD05.08) matters. Draft conditions (CD05.09) will be provided.

The Council's Decision to Refuse Planning Permission

- 1.6. The Application was refused on 20 May 2025, under delegated powers (Decision notice: CD03; Officer's Delegated Report: CD03.02). Whilst there were 10 reasons for refusal in total, only reasons 1-6 represent substantive issues for the purposes of this appeal. The remaining reasons 7-10 are matters which can adequately be dealt with via the submission of an acceptable s106 planning obligation. The reasons for refusal cited in the decision notice were as follows:
 - i. Reason for Refusal 1 - The principle of development: "The location of this unplanned development on a greenfield site in the countryside is unacceptable in principle due to the countryside location outside of settlement boundaries; its appreciable detachment from any recognised settlement limits

and the resulting quantum of development that would be substantially out of scale with the immediate locality. The development conflicts with the spatial objectives of the development plan and policies CP1, CP2, CP3, CP6, CP9 and CP11 of the Core Strategy, CC01, CC02 and TB21 of the MDD Local Plan, Policies IR1, IR2 and AD1 of the Arborfield and Barkham Neighbourhood Plan, the Borough Design Guide SPD and sections 2, 4, 8, 9, 12 and 15 of the NPPF.”

- ii. *Reason for Refusal 2 – Quantum and Scale of Development:* “The proposed location and quantum of development would result in a development with a scale, character and density that is out of keeping with character and appearance of the area and countryside, resulting in a harmful detrimental impact on the locality, contrary to policies CP1, CP3, CP9 and CP11 of the Core Strategy, CC02, CC03 and TB21 of the MDD Local Plan, IR2, AD1 and AD3 of the Arborfield and Barkham Neighbourhood Plan, the Borough Design Guide SPD and sections 2, 4, 8, 9, 12 and 15 of the NPPF”
- iii. *Reason for Refusal 3 - Impact on the landscape and countryside:* “The proposed development will have a detrimental impact on the landscape and character & appearance of the area by reason of the loss of fields, paddocks and green infrastructure in the countryside and the erection of a large housing development that is out of keeping with the locality, contrary to policies CP1, CP3, CP9 and CP11 of the Core Strategy CC02, CC03 and TB21 of the MDD Local Plan, IR2, AD1 and AD3 of the Arborfield and Barkham Neighbourhood Plan, the Borough Design Guide SPD, the Wokingham District Landscape Character Assessment and sections 12 and 15 of the NPPF.
- iv. *Reason for Refusal 4 - Unsustainable Location:* “The application site is within an unsustainable location that would not encourage a modal shift towards sustainable modes of transport, by reason of the countryside location outside of settlement limits, distances to facilities and services and poor quality of the local walking environment, contrary to policies CP1, CP2, CP3, CP6 and CP11 of the Core Strategy, Policies CC01 and CC02 of the MDD Local Plan, the Borough Design Guide SPD and section 8 & 9 of the NPPF.

-
- v. *Reason for Refusal 5 - Best and Most Versatile Agricultural Land:* “Part of the site is grade 3a Agricultural Land and therefore the development results in the loss of Best and Most Versatile agricultural land, contrary to Core Strategy policy CP1 and section 15 of the NPPF.”
- vi. *Reason for Refusal 6 - Impact on Main River Watercourse:* “Part of a main river runs along the southern boundary and insufficient information has been submitted to demonstrate that the proposed development will not adversely impact on flood risk or the watercourse, contrary to policy CC10 of the MDD Local Plan, CP1 and CP3 of the Core Strategy, AD4 of the Arborfield and Barkham Neighbourhood Plan and section 14 of the NPPF.”
- vii. *Reason for Refusal 7 – Avoidance and Mitigation of Impacts on the Thames Basin Heaths SPA:* “In the absence of a planning obligation to secure suitable avoidance and mitigation measures and access management monitoring arrangements, in terms that are satisfactory to the Local Planning Authority (LPA), the LPA is unable to satisfy itself that the proposals include adequate mitigation measures to prevent the proposed development from having an adverse effect on the integrity of the Thames Basin Heaths SPA, in line with the requirements of Regulation 63 of the Conservation of Habitats and Species Regulations 2017 as amended and Article 6(3) of Directive 92/43/EEC. The proposal would be contrary to Policy NRM6 of the South East Plan, Policies CP8 and CP4 of the Core Strategy.”
- viii. *Reason for Refusal 8 – Section 106 Planning Obligation:* “In the absence of a completed legal agreement, the proposal fails to secure opportunities for training, apprenticeships, and other vocational initiatives to develop local employability skills contrary to MDD Policy TB12.
- ix. *Reason for Refusal 9 – Section 106 Planning Obligation:* “In the absence of a completed Legal Agreement, the scheme fails to make adequate provision for affordable housing, contrary to policy CP5 of the Core Strategy and Section 5 of the NPPF.
- x. *Reason for Refusal 10 – Section 106 Planning Obligation:* “In the absence of a completed Legal Agreement, the proposed development fails to make adequate contributions to sport and recreational facilities, contrary to MDD

Local Plan policy TB08, Core Strategy policy CP4 and sections 4 and 8 of the NPPF.”

1.7. Additionally, the Council in its Statement of Case (CD04.03) raised additional issues as follows:

- i. Additional Issue 1: Prejudice to the delivery of Loddon Valley Garden Village
- ii. Additional Issue 2: Access and Visibility Splays
- iii. Additional Issue 3: Irreplaceable Habitats
- iv. Additional Issue 4: Protected Species and BNG

1.8. Following the Case Management Conference held on 16 January 2026 the Inspector identified, in her note dated 19 January 2026 (CD22.04), the main issues for this appeal, as follows. This list has been used to structure my evidence:

- i. Whether the proposed development is in a suitable location having regard to local and national policies in relation to the location of housing.
- ii. The effect of the proposed development on the character and appearance of the surrounding area.
- iii. Whether the quantum and scale of development is acceptable.
- iv. Whether the proposal would be sustainable development, having regard to its location and the opportunities for sustainable travel.
- v. The effect of the proposed development on the nearby watercourse with particular regard to flooding and water quality. In relation to this matter the parties should base their evidence on the Environment Agency’s most recent advice and flood maps.
- vi. Whether any potential adverse effects on the integrity of the Thames Basin Heaths SPA would be adequately mitigated.

- vii. Whether the proposal would prejudice the delivery of Loddon Valley Garden Village for reasons of highway capacity.
 - viii. The overall planning balance.
- 1.9. Additional matters to be covered in this planning evidence include the issue of Best and Most Versatile Agricultural Land, and the matters covered by the s106 planning obligation.

2. The Appeal Site and Surrounding Area

The Appeal Site

- 2.1. Extending to approximately 6.44ha, the Appeal Site is shown edged red on the Site Location Plan (Reference 052403-DAN-LOC01) (CD01.05).
- 2.2. The Appeal Site comprises privately owned fields, a paddock, and a caravan storage area. The Site boundaries are demarked by hedgerows and mature trees to the east, west and south with residential development abutting the northern and part of the southern boundaries.
- 2.3. There is an existing private pedestrian and vehicular access point to the Appeal Site from Reading Road; this is proposed to be repositioned slightly further east to ensure safe and suitable access for the proposed development.
- 2.4. A watercourse traverses the western part of the Appeal Site and thereafter is shown on the Environment Agency Flood Map for Planning as running along the southern Site boundary, parallel to Reading Road. This watercourse is classified a Main River by the Environment Agency. As such, an 8m maintenance strip has been allowed for in the illustrative masterplan proposals.
- 2.5. The Multi Agency Geographic Information for the Countryside Map ('MAGIC') and the Proposals Map indicates that the Site is not covered by any statutory designations for landscape character or quality.
- 2.6. The Site is within the Zone of Influence around Thames Basin Heaths Special Protection Area ("SPA") and accordingly there is a requirement to mitigate the risk of additional recreational pressure on that SPA via contribution to Suitable Alternative Natural Greenspace ("SANG").
- 2.7. The Site is not within any Conservation Areas and there are no Listed Buildings on the Site itself (the nearest being two Grade II listed buildings located to the northwest and northeast of the site on Church Lane, Arborfield). In accordance with sections 66(1) and 72(1) of the Planning (Listed Buildings and

Conservation Areas) Act 1990 (“the LBCA Act”), the masterplan approach has paid special regard to the desirability of preserving the wider setting of those listed buildings potentially affected by the proposals, as well as any features of special architectural or historic interest which they may possess. It is an agreed matter (as per the Overarching Statement of Common Ground) that the proposal would not result in harmful impacts on heritage assets or their setting.

Locational Context

- 2.8. The surrounding area is semi-rural in character with bands of residential development set back from the highway within leafy frontages.
- 2.9. Views into the Appeal Site from public viewpoints are generally limited to glimpsed views from Reading Road and Church Lane, due to the well-vegetated Site boundaries and surrounding built form. Additionally, there are some localised viewpoints into the Site from adjoining properties along Church Lane, to the north of the Site, although existing vegetation affords a degree of screening.
- 2.10. To the north and west of the Appeal Site is the historic core settlement of Arborfield, characterised by a string of residential development along Church Lane.
- 2.11. The Arborfield and Barkham Neighbourhood Plan (CD06.03 at paragraph 4.6(b)) (which forms part of the Development Plan against which the acceptability of the Appeal Scheme is to be assessed) expressly identifies this historic core of Arborfield as a separate settlement in its own right (that is, separate to Arborfield Cross, which is the nearest settlement with a defined settlement boundary, or Arborfield Garrison further south). The Arborfield Village Design Statement (CD06.04 at page 3 – reference to ‘original Arborfield village’) also takes a similar approach:

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

1. Arborfield Cross with the A327 running through its centre is a conservation area. It is the centre of the village, the Coombes school, public houses, local

shops, the local park, and the Royal British Legion all being located there.

2. Original Arborfield Village which incorporates Greensward Lane, Julkes Lane, Carters Hill and Church Lane, together with the Ruin of St Bartholomew church that dates back to 1200. The new church built in 1863 is also located in Church Lane.

3. Arborfield Garrison where the most recent development has taken place is located to the south of the min village, east of the A327 and contains a variety of private and Ministry of Defence houses.”

2.12. As such, the Appeal Site is adjacent to and on the edge of the historic original settlement of Arborfield, which although it does not have a designated ‘Development Limit’ in the out-of-date Local Plan, is identified in the statutory Development Plan (for the purposes of s38(6) Planning and Compulsory Purchase Act 2004)) – the Arborfield and Barnham Neighbourhood Plan, as having the identity of a separate settlement in its own right. It is also identified as such in the Village Design Statement.

2.13. To the immediate south of the Appeal Site, on the opposite side of Reading Road, is existing residential development along Waldren Avenue and the Cross Lanes Farm complex. Land to the immediate east of the Appeal Site is of open character associated with the Lockey Farm complex.

Accessibility

2.14. The Appeal Site is well related to existing surrounding urban environments. The nearby defined settlements of Arborfield Cross and Arborfield Green (including the Arborfield Garrison strategic development location) are walkable/cyclable from the Site, with local amenities including primary school, public house, convenience store and recreation ground available at the settlement of Arborfield Cross. There is an existing pedestrian from the Site to Arborfield Cross. The Highways Statement of Common Ground (CD05.05) identifies the distance from the Site to various services and facilities.

2.15. The larger settlements of Wokingham and Reading are easily accessible by regular bus service. Bus route Leopard 3 (running between Reading and Wokingham) provides a regular service (Monday – Saturday 2-4 buses/hour

from 06:05 to 23:36 and Sundays 2 buses/hour running from 08:39 to 21:44). There is an existing bus stop from which to utilise this service, adjacent to the Appeal Site's southern boundary.

- 2.16. Accordingly, the Appeal Site affords a sustainable location in which to meet identified housing needs. Further detail is set out in the evidence of Mr Matthew Stevens addressing highways and accessibility matters.

Context: Other Development Sites in the Locality

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

- Land to the north of School Road Arborfield Cross - LPA Ref 250735 – Wokingham's planning committee followed their officer's recommendation and resolved to approve a scheme of up to 70 dwellings (subject to s106); (9 July 2025). (CD10.01.01, 02 and 03)
- Land off Langley Common Road, Arborfield, Wokingham - LPA Ref 232490 – Wokingham's planning committee followed their officer's recommendation and resolved to approve a scheme of up to 50 dwellings in the countryside between Arborfield Cross and Arborfield Green (subject to s106). (CD10.02.01 and 02)
- Land west of Trowes Lane and north of Charlton Lane, Swallowfield RG7 1RT (Appeal Ref: APP/X0360/W/24/3340006) (LPA Ref 230422) – Appeal determined July 2024, allowing a scheme of up to 81 dwellings. (CD10.03)
- Land adjacent to Blagrove Lane, Wokingham RG41 4AX (Appeal Ref: APP/X0360/W/24/3354667) (LPA Ref 222306) – Appeal determined May 2025, allowing a scheme of up to 350 dwellings and C2 care home. (CD10.05.01, 02 and 03)

-
- Land between Lodge Road and Tape Lane, Hurst RG10 0EG Appeal Ref: APP/X0360/W/25/3364304 LPA Ref: 242067 (dismissed appeal for up to 99 homes; the inspector found that failure of the Sequential Test in that case amounted to a footnote 7 ‘strong reason for refusal’ which disengaged the tilted balance) (CD10.06)
 - Land east of Hayes Drive and North of Church Lane, Three Mile Cross, Reading, Berkshire Appeal Ref: APP/X0360/W/24/3354607; LPA Ref: 233038 (dismissed appeal for up to 148 dwellings on land affected by AWE constraints) (22 September 2025) (CD10.07)
 - Land at Heathlands Road, Wokingham RG0 3AR Appeal Ref: APP/X0360/W/25/3359928; LPA Ref: 240831 (appeal dismissed 24 September 2025) (CD10.08) – the Inspector found that the adverse impacts of a 49 dwelling scheme would significantly and demonstrably outweigh the benefits in circumstances where the evidence suggested there would be deterioration of irreplaceable habitat. In that case, an oak had already been felled; its stool remained and was considered to retain veteran status. That scheme involved the need to excavate into the RPA to achieve the footway at the site access.
 - Land to the south of Gazelle Close, Winnersh. LPA Ref 230099; Appeal Ref APP/X0360/W/24/3339712 (SoS; 27 October 2025)

Loddon Valley Garden Village Strategic Development Location

- 2.18. Two live applications, as yet undetermined, propose to deliver part of a large strategic scale development in close proximity to this Appeal Site. The first is LPA Application Reference 252498, relating to a site known as ‘Hall Farm Church Lane Arborfield Reading RG2 9HX’ (CD12.01 – CD12.13).
- 2.19. The second is LPA Application Reference 252769 relating to a site known as ‘Land north of Mole Road and Church Lane, Newlands Farm RG2 9JD’ (CD12.14 – CD12.19).
- 2.20. Together, these sites form part of a proposed site allocation referred to in the

Emerging Local Plan (presently undergoing examination) as 'Loddon Valley Garden Village Strategic Development Location' ('LVGV SDL'). (Policy SS13 – at page 80 of CD07.01 and shown on Policy Maps C1 and D2 – which are CD07.08 and CD07.11 respectively). As set out in Policy SS13, LVGV is proposed for allocation for around 3,930 homes, 100,000m² commercial/R&D floorspace, 2no primary schools and 1no secondary school, together with district centre and 2no local centres.

- 2.21. Whilst these two live applications propose the delivery of the majority of the proposed site allocation, one key part of that allocation ('Hatch Farm') is not yet the subject of any live planning application.
- 2.22. Appendix MS13 to the Proof of Evidence of Matthew Stevens contains a plan showing the various services and facilities proposed at LVGV SDL via the allocation of the site in the LPU and via the two applications now submitted for determination. These are also shown on the Illustrative Masterplans (CD12.09 and CD12.16) and Land Use Parameter plans (CD12.03 and CD12.18) for the live applications.
- 2.23. Application 252498 is a Hybrid Application (CD12.07 is the combined parameter plan). The Outline part of the Application reserves all matters other than access (which will include a new pedestrian, cycle and vehicular access to Lower Earley Way via a new 4th arm to the Meldreth Way roundabout; a new pedestrian, cycle and vehicular bridge over the M4; a new pedestrian, cycle and vehicular bridge over the River Loddon; a new vehicular access to the A327 Reading Road, via a new arm to the Observer Way roundabout; a new pedestrian, cycle and vehicular access to Thames Valley Science Park; Phase 1 of internal roads including pedestrian / cycle routes, associated infrastructure, drainage and landscaping). (See CD12.03 for the Land Use Parameter Plan and CD12.09 for the Illustrative Masterplan).
- 2.24. All other matters are reserved, in that application, for later determination at reserved matters stage. The outline part of the Application proposes the following scale and quantum of development (as identified on CD12.09):
- i. up to 2,800 residential units (to include up to 100 custom and self-build plots);

-
- ii. 2 primary schools (up to 3 forms of entry) to include early years provision;
 - iii. 1 secondary school (up to 12 forms of entry);
 - iv. 1 District Centre, to incorporate up to 11,000m² of Class E (Commercial, Business and Service, to include a food store of around 2,500m²), and Class F (Local Community and Learning);
 - v. 1 Local Centre, to incorporate up to 2,400m² of Class E; a Sports Hub to include sports pitches and pavilion space; up to 4,250m² of further Class E, Class F, and sui generis development to include commercial, health care and public house;
 - vi. associated green infrastructure, landscaping, public open space, play areas, and ecological enhancement measures;
 - vii. 20 gypsy and traveller pitches;
 - viii. drainage and flood alleviation measures to include Sustainable Urban Drainage Systems (SUDS) and engineering measures within Loddon Valley for the River Loddon;
 - ix. associated highway / transport / supporting infrastructure including spine road, pedestrian and cycle connections; associated utilities, infrastructure, and engineering works, including the undergrounding of overhead lines and an electricity substation;
 - x. up to 0.5ha of land adjoining St Bartholomew's Church for use as cemetery.

2.25. The detailed part of the above application relates to the delivery of proposed 40.4 hectares of Suitable Natural Greenspace (SANG) (CD12.02), 18.35 hectares of SANG link, and provision of Biodiversity Net Gain measures, the demolition and clearance of buildings and structures at the Centre for Dairy Research (CEDAR) and at Hall Farm, the demolition of 3 existing dwellings, and the retention of specified buildings at Hall Farm as specified by the applications drawings.

2.26. Application 252769 is an Outline planning application (CD12.14 – CD12.19) with all matters reserved other than principal access from Mole Road, for up to 430 dwellings, associated infrastructure to include a connection through to the proposed Spine Road, ref. 252498, new pedestrian cycle link connecting Byway ARB03 Carters Hill Lane and Byway ARB08 Elliss Hill, associated

landscaping to include formal and informal public open space, biodiversity enhancements and associated utilities, infrastructure, and engineering works.

- 2.27. Should either of the above applications be approved, the contextual analysis of this Appeal Site would change. Given the scale of the LVGV SDL proposals and the Council's estimates on delivery rates/ the housing trajectory (CD07.33), it is unlikely to materially impact the housing supply position in the short term.

3. The Appeal Scheme

Introduction

- 3.1. The Application was developed and informed following a thorough review of the opportunities and constraints afforded by the Application Site.
- 3.2. The Appeal Scheme proposes up to 111 dwellings (C3 Use), including up to 44 affordable homes (40%) along with associated landscaping and open space with access from Reading Road.
- 3.3. Only the principle of developing the site for up to 111 dwellings and associated works. (as described above), together with the means of access are to be determined as part of this appeal. Appearance, landscaping, layout, and scale are reserved for subsequent determination.
- 3.4. The proposals for approval via this appeal are set out on the following plans:
 - Site Location Plan No. 052403-DAN-LOC01 (CD01.05)
 - Emergency Access Plan No. 147.0017.0009 Rev P01 (CD1.28)
 - Refuse Vehicle and Fire Appliance Tracking – Proposed Site Access Drawing No. 147.0017.0006 Rev P02 (CD1.29)
 - Proposed Site Access General Arrangement Plan No. 147.0017.0001 Rev P07 (CD1.30)
- 3.5. In addition to those application plans, additional supporting plans have been provided submitted for illustrative purposes only/ background information to aid in the assessment of the scheme. This list includes version as updated during the application/ appeal process in response to ongoing discussions regarding trees:
 - Access Details and Tree Removal Plan (Milestone Dwg Ref: 25103-006 Rev C) (as requested by the Inspector at the CMC and subsequently submitted to the Inspector in hard copy 29.01.2026 and electronically to the LPA on that same date)
 - Topographical Survey No. 052403-DAN-TOPO1 (CD01.08)

- Illustrative Masterplan No. 052403-DAN-MP04 (CD23.01) (as submitted 04.02.2026) (in response to the ongoing discussions with the LPA regarding tree impacts and the assessment thereof)
- Indicative Land Use Plan No. 052403-DAN-MP04-ILUP (CD23.02) (as submitted 04.02.2026) (in response to the ongoing discussions with the LPA regarding tree impacts and the assessment thereof)
- Tree Removal Plan 052403-DAN-MP04-TRP (CD23.03) (as submitted 04.02.2026) (in response to the ongoing discussions with the LPA regarding tree impacts and the assessment thereof)
- Illustrative Parking Plan and Accommodation Schedule (Drawing Ref 052403-DAN-IPP (contained within Highways Response Note CD01.22 submitted during the course of the application).
- Illustrative landscape Masterplan (Drawing Ref GLS_050_171_1201) (CD01.19)

Masterplan Approach

- 3.6. The Illustrative Masterplan has been informed by a number of technical studies (as summarised in Section 4 of the Planning Statement, CD01.03) alongside consideration of relevant planning policy requirements. The Masterplan approach, including in relation to design, is underpinned by a thorough contextual appraisal of the site and its surroundings.
- 3.7. In particular, and as detailed in the chapter of the Design and Access Statement (“DAS”) (section titled ‘The Context of the Development’) (CD01.04.01 and 02) a thorough contextual analysis was carried out in terms of the receiving landscape, the wider setting (including proximity to Reading and Wokingham, and to the Loddon Valley SDL), the townscape context (detailing the form and character of existing development on Greensward Lane, Church Lane, and Walden Ave), identification of green corridors so as to incorporate connectivity into the scheme proposals and also analysis of local services and facilities. Full details are set out in submitted with the DAS (CD01.04.01-02)
- 3.8. The Masterplan vision is to create a high-quality and considered development, that responds appropriately to the constraints and opportunities of the Appeal

Site and its surrounding context and provides a range of dwelling sizes to meet different occupiers' needs. These will be set within a hierarchy of streets, with green open space and natural surveillance. The houses will be designed to respect and reflect the character of the area, so that the development has a bespoke design which is in keeping with the established local character.

3.9. The vision is to be achieved through the following design principles included in the DAS (CD01.04):

- i. Complementing the proposed LVGV allocation and providing a clearly defined settlement boundary (page 1 of DAS)
- ii. Promoting pedestrian, cycle and public transport modes of transport (page 2 of DAS)
- iii. Accessible landscaped public open space for the benefit of all (page 2 of DAS);
- iv. Sustainable drainage which also offers landscape and ecology benefits (page 2 of DAS);
- v. Creation of a 'distinctly Arborfield' built environment (page 8 and 26 of DAS);
- vi. Creating blue and green infrastructure (page 12 of DAS);
- vii. Residential development concentrated in the core of the Appeal Site, set between new areas of green space (page 17 of DAS);
- viii. Facilitating walking and cycle choice with new connections to local shops and facilities (page 20 of DAS);
- ix. Well defined streets and spaces (page 27 of DAS)
- x. Mult-functional landscape features delivering green infrastructure connectivity (page 32 of DAS)

3.10. As set out in the Illustrative Landscape Masterplan (CD01.19) a number of landscape principles were established:

- i. Retention of the existing landscape structure, particularly around the site boundary. Internal vegetation retained where feasible.
- ii. Veteran trees to form a focal point within open space areas.
- iii. Supplemental planting around the site boundary to create a strong features; to contain 50% evergreen species.
- iv. Buffer planting to the northern boundary.
- v. Footpath connections to the wider landscape.
- vi. Dwellings offset from Reading Road and Church Lane to minimise built form immediately adjacent to the site boundary to minimise visibility of built form.
- vii. Public open space on the eastern part of the site to create a softer transition to the countryside.

3.11. The principal elements of the Appeal Scheme are summarised as follows (as shown for indicative purposes on the Illustrative Masterplan) (C23.01):

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

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

Layout and Access

- 3.13. Illustrative Masterplan No. 052403-DAN-MP04 (CD23.01) shows one way in which the proposed residential development could be laid out on the Site. It was updated and submitted to the Inspectorate and LPA on 04.02.2026 in response to ongoing discussions in connection with the Arboriculture Statement of Common Ground. In summary the masterplan was amended to make clear that 111 dwellings could be accommodated on the Site without built form or residential curtilages impinging into the RPAs of veteran trees.
- 3.14. The location of the proposed vehicular access point onto Reading Road is the only suitable access point for the Site. The determination of this access point has been informed by a speed survey to inform required visibility splays and arboricultural assessment of affected trees.
- 3.15. The principle of a simple bell mouth junction design, developed in line with DMRB standards and with the appropriate forward visibility, is proposed as the means of vehicular access, and main pedestrian access, to the site. This junction can accommodate the predicted development traffic that would be generated by the development. An additional pedestrian link to Church Lane is proposed to ensure safe access for existing and future residents.
- 3.16. The carriageway width of 6m (CD01.26) (updated from 5.5m during the course of the application – the original proposal is appended to the Transport Assessment at CD01.10) will accommodate vehicular access into the Site with footpath connections proposed to link into the wider footpath network along the western and southern site boundaries.
- 3.17. A package of footway improvements/lighting installation will enhance the pedestrian connections from the Site to Arborfield Cross, as detailed in the Proof of Evidence of Mr Matthew Stevens addressing highways and accessibility matters.

Land Uses

- 3.18. The technical assessments that have been undertaken in relation to the Site are intended to support a scale of development for up to 111 dwellings, together with a means of access from Reading Road.
- 3.19. Analysis of the Site's topography (CD01.08), flood risk and drainage (CD01.11), arboricultural (CD01.14) and ecological (CD01.13) requirements informed the proposed siting of two large areas of open space at the eastern and western ends of the Site. The siting of the dwellings (for future consideration) will be influenced by the location of existing development (outside of the Site boundaries), position of existing trees and their associated Root Protection Areas (RPAs), as well as general good design principles.
- 3.20. The Illustrative Masterplan (CD23.01) accommodates a range of dwelling types and sizes, laid out in distinctive groupings to create visual interest and a sense of place, with detached dwellings addressing the site entrance and providing natural surveillance over the areas of public open space, with higher density runs of terraced dwellings contained within the centre of the development. The layout as drafted would create movement and variety within the future development. Consideration has been given to accommodating the requisite parking provision and garden amenity areas, as well as landscaped boundaries, public space, and children's play area.

Table 1: Proposed Land Uses (as per Indicative Land Use Plan 052403-DAN—MP04-ILUP – CD23.01)

Land use	Ha	Approx Dwellings	No.
Residential (C3 use) and associated infrastructure (roads/SuDS/Attenuation)	Approx 3.888ha	Up to dwellings	111
Open Space and Green Infrastructure <i>Includes local open space, amenity areas, semi-natural greenspace and landscape buffers, ecology enhancements</i>	Approx. 2.554ha	N/A	
Total	6.4ha	Up to 111	

Housing Mix and Affordable Housing

- 3.21. The Scheme proposes 40% affordable housing (which equates to 44 dwellings based on a 111-dwelling scheme).
- 3.22. The remaining (up to) 67 market dwellings will comprise a range of 1 – 4-bedroom houses, with the precise mix to be agreed at the reserved matters stage.
- 3.23. The development will allow for a mix of housing sizes, types, and tenures, to meet the local needs identified in the most recent evidence base. This could include a mixture of family housing and smaller starter homes.
- 3.24. The affordable housing provision meets the current policy requirement of 40% on greenfield sites of 5+ dwellings as set out in Core Strategy Policy CP5 and seeks to address the acute affordable housing need within the Borough.

Density

- 3.25. With a site area of 6.4ha the gross density is 17.3dph. The net density of the developable area, however, is 28.5dph set within an additional 2.5ha of landscaped green/open space. This density will ensure the new dwellings integrate with, and complement the local area in terms of scale, massing and layout, whilst sympathetically responding to the Site's edge of settlement location (and the lower densities along Church Lane, Arborfield) whilst making efficient use of this sustainably located land parcel.

Landscaping Strategy

- 3.26. Although landscaping is a reserved matter, section 6 of the Landscape and Visual Appraisal which accompanied the application set out a number of landscaping principles, accommodated within the Illustrative Landscape Masterplan. These principles include:
 - i. Retention of the existing landscape framework/structure, particularly around the site boundary. Internal vegetation retained where feasible;

-
- ii. Supplemental vegetation planted around the site boundary to create a strong feature; to be native and 50% evergreen;
 - iii. Additional landscape buffer to the north boundary which is presently unvegetated;
 - iv. Space for tree planting within residential parcels;
 - v. New sustainable footpath connections;
 - vi. Dwellings offset from Reading Road and Church Lane to minimise visibility of built form and retain wooded character;
 - vii. Maximum 2.5 storey building height to tie into surrounding built form;
 - viii. Public open space delivered to east of site to create a softer transition to the countryside.
 - ix. Incorporation of SuDs features.
- 3.27. It is envisaged that the public spaces will be managed and maintained through the establishment of a Management Company, whilst the residential landscaping will be the responsibility of each plot owner. Veteran trees will lie beyond private dwelling/curtilage boundaries and will be managed by the management company.

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

General

- 4.1. This section of my Updated Proof of Evidence identifies relevant Development Plan policies, noting that section 38(6) Planning and Compulsory Purchase Act 2004 creates a statutory requirement that applications be determined in accordance with the Development Plan unless other material considerations indicate otherwise. In doing so I have focused upon the particular policies identified in the reasons for refusal and the main issues arising in this appeal. In accordance with *R v Rochdale Metropolitan Borough Council ex parte Milne* [2000] EWHC 650 (CD9.01) the relevant question is whether the proposal accords with the Development Plan as a whole rather than whether it accords with each and every policy contained therein. This has more recently been confirmed in *Corbett v Cornwall County Council* [2020] EWCA Civ 508 (CD09.02)
- 4.2. After considering compliance with the Development Plan this section of my proof then goes on to identify and outline other relevant material considerations.

THE DEVELOPMENT PLAN

Overview

- 4.3. The relevant parts of the adopted Development Plan comprise:
- Saved Policy NRM6 of the South-East Plan.
 - The Core Strategy ("CS") (CD06.01) - adopted in 2010, prior to the first introduction of the NPPF in 2012. The CS sets out the spatial strategy for development management in the period up to 2026.
 - The Managing Development Delivery Local Plan ("MDD") (CD06.02) - adopted 2014. The MDD sets out detailed policies for delivery of the CS's 2010 spatial strategy.

- The Arborfield and Barkham Neighbourhood Plan (made April 2020) (CD06.03) which is based upon the 2010 CS and does not assess or seek to deliver housing other than in accordance with the CS 2010.

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

Saved Policies of the South-East Plan

- NRM6 – Thames Basin Heaths Special Protection Area

Core Strategy

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

Managing Development Delivery DPD

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

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

Arborfield and Barkham Neighbourhood Plan

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

Development Plan Compliance

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

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

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

OTHER MATERIAL CONSIDERATIONS

Overview

- 4.8. In accordance with s38(6) PCPA, other material considerations may justify a positive decision despite a conflict with the Development Plan. The most important material considerations in this case are the NPPF (in particular its objective to significantly boost housing), the Housing Land Supply Position statement (CD06.12) (with the Council accepting that it cannot demonstrate the necessary five years' supply of deliverable housing sites and the acceptance, by the Council -via its Proposed Submission Local Plan- that it is unable to meet identified housing needs without breaching established settlement boundaries); furthermore the Council proposes to deliver a significant portion of the necessary growth in a location in close proximity to this Appeal Site, further boosting the sustainability credentials of this Site. In summary, the material considerations relevant to the determination of this Appeal are as follows.

- a. NPPF and associated PPG;
- b. Identified Housing Needs and 5 Year Housing Land Supply Position;

- c. Affordable Housing Needs;
- d. Absence of adopted policy to meet identified housing needs;
- e. Acceptance, by the Council, of the need to breach settlement boundaries in order to meet identified housing requirements (as set out in the proposed Submission Local Plan Update);
- f. The Council's proposal to deliver significant growth in close proximity to the Appeal Site, further improving its sustainability credentials;
- g. Wokingham Borough Council Local Plan Update and Evidence Base Studies.
- h. Recent LPA and appeal decisions relating to development proposals in Wokingham Borough Council's administrative area:

i. Application No. 250735 Land to the North of School Road, Arborfield Cross.
(CD10.01.01)

ii. Application No. 232490 Land off Langley Common Road, Arborfield,
Wokingham. (CD10.02.01)

iii. Appeal Decision APP/X0360/W/24/3340006 - Land west of Trowes Lane
and north of Charlton Lane, Swallowfield RG7 1RT (allowed, 19 July 2024)
(CD10.03)

iv. Appeal Decision APP/X0360/W/24/3354667 (Land adjacent to Blagrove
Lane, Wokingham RG41 4AX) (allowed, 29 May 2025) (CD10.05.01)

v. Appeal Decision APP/X0360/W/25/3364304 (Land between Lodge Road
and Tape Lane, Hurst RG10 0EG) (dismissed, 9 October 2025) (CD10.6)

vi. Appeal Decision APP/X0360/W/24/3354607 (Land East of Hayes Dr and
North of Church Lane, Three Mile Cross, Reading Berkshire) (dismissed,
22 September 2025) (CD10.7)

vii. Appeal Decision APP/X0360/V/24/3339712 (Land to the south of Gazelle
Close, Winnersh. LPA Ref 230099; SoS decision 27 October 2025)

-
- i. Recent live applications for LVGV SDL (strategic scale development) in close proximity to appeal Site: LPA Application References 252498 and 252769 (CD12)
 - j. Appeal decision relating to mitigation of impacts on SPAs: APP/A1910/W/23/3333545 - Rectory Farm, Kings Langley, Hertfordshire, Dacorum, WD4 8HG (decided May 2024) (CD11.01)
 - k. Borough Design Guide SPD (CD06.05) and other SPD documents including the Arborfield Village Design Statement (CD06.04) and the others listed at CD06.

Absence of Adopted Policy for Development to Meet Identified Housing Requirements

- 4.9. The CS (2010) (CD06.01) made provision for at least 13,230 dwellings in the period 2006 to 2026 as set out in Policy CP17. Notably, this level of delivery was based on the historic South-East Plan targets and a backlog arising from the older Structure Plan which persisted at the point of adoption (as per para 4.77 CS). The development limits and settlement boundaries in the Development Plan flow from that spatial strategy and the assessment of housing need at that time.
- 4.10. Accordingly, the Development Plan is out of date in relation to housing requirements, in terms of the level provision planned for in CS Policy CP17. The CS, MDD and ABNHP do not seek to identify or meet in full the objectively assessed needs for market housing using a NPPF compliant assessment (derived via the standard method). Nor do they identify or meet objectively assessed needs for affordable housing.
- 4.11. The content of the spatial strategy pre-dates the first publication of the NPPF in 2012. Accordingly, that collection of policies is in conflict with the NPPF requirement (paragraph 61) to significantly boost the supply of housing.

- 4.12. In *Suffolk Coastal DC v Hopkins Developments Ltd* [2017] UKSC 37 (CD09.03) Lord Carnwath's judgment confirms at paragraph 63¹ that the weight to be attached to restrictive policies, such as countryside and landscape policies, can be reduced where they are derived from settlement policy boundaries that in turn reflect out of date housing requirements.
- 4.13. On that basis, Policy CP17 is out of date, and so too are the associated settlement boundaries and 'Development Limits' set out the Development Plan documents which deliver on that dated CS vision (CP9, CP11 of the CS, CC02 of the MDD and AD1 of the NHP).
- 4.14. There is an inability to meet identified needs within existing settlement limits. As such, only **limited** weight can be given to the conflict between the Appeal Scheme and the settlement boundaries defined by Policies CP9, CP11, CC02 and AD1. In all other respects, the Application Scheme is considered to be compliant with the development management policies within the suite of Development Plan documents, other than the minor loss of good quality agricultural land (0.7ha) which attracts **very limited** weight, and the change in landscape character which attracts **moderate** weight..
- 4.15. Furthermore, whilst the Council accept they are unable to demonstrate an adequate supply of deliverable housing land, and that there remains an acute need for affordable housing, the Appellants position is that the extent of the shortfall is greater than that accepted by WBC. Their latest position statement (August 2025) concluded that there is a deliverable housing land supply of only 2.5 years during the period April 2025 to March 2030. The Appellant's position is that it is a maximum of 2.3 years. A Statement of Common Ground on Housing Land Supply has been agreed between the Appellant and LPA and

1.1. ¹ "He was clearly entitled to conclude that the weight to be given to the restrictive policies was reduced to the extent that they derived from "settlement boundaries that in turn reflect out-of-date housing requirements" (para 94). He recognised that policy NE.4 had a more specific purpose in maintaining the gap between settlements, but he considered that the proposal would not cause significant harm in this context (para 95). His final conclusion (para 101) reflected the language of paragraph 14 (the tilted balance). There is no reason to question the validity of the permission."

confirms that the supply is 2.3 to 2.5 years. The difference between the parties is not considered material to the outcome of this Appeal.

- 4.16. The Neighbourhood Plan was made more than five years ago so does not alter the tilted balance in terms of the operation of paragraph 14 NPPF.
- 4.17. On that basis, the weight to be attached to the conflict with Policies CP9 and CP11 of the CS, CC02 of the MDD and AD1 of the NHP, (which relate to the Site's location beyond defined settlement limits at Arborfield Cross) is reduced due to the operation of paragraph 11(d) NPPF.

Five-Year Housing Land Supply Position

- 4.18. The Council accepts that it cannot demonstrate the necessary five-year supply of housing land; the Council has prepared an updated land supply assessment (CD06.12) for the period April 2025 to March 2030, showing only 2.5 years' supply of deliverable housing sites (compared to the 1.7 years available between April 2024 and March 2029 – CD07.34). The Appellant's position is that the extent of shortfall is in fact greater, at a maximum of 2.3 years. The difference relates to the deliverability of three sites in particular. A Statement of Common Ground on Housing Land Supply has been agreed between the LPA and Appellant which confirms that the supply is at most 2.5 years. Annex 1 to this Proof sets out the detail underpinning the Appellant's position that the supply is in fact 2.3 years'.

Table 1: Housing Land Supply Position - Comparison		
Step	LPA	Appellant
A - Annual requirement (1/4/25 – 31/3/30)	1,317	1,317
B - Base year Requirement: (1/4/25 – 31/3/30) (A x 5)	6,585	6,585
C - Add 5% buffer pursuant to HDT (B x 5%)	329	329
D – Final five year requirement (1/4/25-31/3/30) (B + C)	6,914	6,914
E - Annual requirement (1/4/25 – 31/3/30) (F/5)	1,382.8	1,382.8
F – Deliverable supply (1/4/25 – 31/3/30)	3,453	3,181

G - No. Years Supply (F/E)	2.50	2.30
H - Extent of Surplus / Shortfall compared to 5 year requirement (F – D)	-3,461	-3,733

- 4.19. The Joint Arborfield and Barkham Neighbourhood Plan was made of 22nd April 2020. As the fifth anniversary of its adoption occurred on 22nd April 2025, paragraph 14 of the NPPF does not apply, (and it is further noted that that plan contains no site allocations).
- 4.20. As confirmed in case law (see *Hallam Land Management Ltd v Secretary of State* [2018] EWCA Civ 1808), (CD09.04) the extent of the shortfall is relevant to the weight that can be given to out-of-date policies, as well as to the benefits of housing delivery. In addition, Paragraph 232 of the NPPF requires that the weight to be given to policies according to their degree of consistency with the Framework – with more weight given to policies which are consistent with the NPPF's objectives and goals. Accordingly, the extent of the shortfall is substantially material to assessing the merits of housing delivery from the Appeal Scheme.
- 4.21. The Council's inability to demonstrate a five-year supply of housing land supply engages the presumption in favour of sustainable development pursuant to NPPF paragraph 11d.
- 4.22. Given the Appeal Site is predominantly greenfield land, the ability to deliver quickly and thus contribute towards the 5-year housing land supply shortfall is considered to represent a substantial benefit of the proposal.
- 4.23. The delivery of market housing from the Appeal Scheme, in a sustainable location is a material consideration of **substantial weight** in favour of the grant of planning permission.

Acceptance of the need to breach current settlement boundaries in order to meet identified housing needs

- 4.24. As is inherent in the Council's decision to allocate greenfield land in the Local Plan Update, the Council cannot meet its identified development needs by

adhering to and applying the settlement boundaries as defined in the current Core Strategy and Site Managing Development Delivery DPD.

“The challenge of meeting development needs is greater in Wokingham Borough than many other areas. This is due to the comparatively limited availability of previous developed land that can be reused to meet future needs and the presence of constraints such as the Green Belt, flooding and the emergency planning zone around AWE Burghfield, all of which act to limit the supply of potentially suitable land and choices.” ... (CD 07.01 Submission Local Plan at paragraph 1.8)

*“However, it is recognised that given the nature of the borough and the level of future need, **it is necessary to allocate greenfield land for development.** Such allocations are focused on the delivery of a new garden village on land between Shinfield, Sindlesham and Arborfield known as Loddon Valley Garden Village; around the edge of the South Wokingham Strategic Development Location; and the Arborfield Green Strategic Development Location. Loddon Valley Garden Village has capacity for around 3,930 new homes of which 2,700 would be built within the plan period. A number of other site allocations have also been included, varying in scale, to provide a mix of sites in terms of scale and location. These sites were considered the most suitable to accommodate development through the site assessment process and will ensure a supply of deliverable sites over the plan period to meet needs. Some of these allocations are on the edge of minor settlements. The scale of development proposed is considered proportional to the overall housing requirement and will help to maintain the vitality of those communities and meet local housing needs” (CD07.01 Submission Local Plan at paragraphs 4.31 – 4.32. **(my emphasis added)**)*

- 4.25. This is demonstrably the case given the review of settlement limits undertaken through the emerging Local Plan Update process, and the proposal (in the Submission Plan presently undergoing Examination) to allocate significant areas of additional land beyond current settlement boundaries for new housing. It is clear that the current boundaries (defining the settlements) cannot be maintained in their current position if the identified housing need is to be met. The quote above expressly recognises this fact. This is a material consideration

that weighs against the conflict arising from the Site's location outside of these out-of-date settlement boundaries defined under Policies CP9, CP11 CC02 and AD1 of the Development Plan.

4.26. Furthermore, recent decisions to approve proposals beyond the settlement boundaries reinforce this point, as follows:

- i. APP/X0360/W/24/3354667 - Land adjacent to Blagrove Lane, Wokingham RG41 4AX (CD10.05.01 at paragraphs 127-129):

"The proposal would also not result in isolated homes in the countryside, as it would abut and extend the settlement of Wokingham. Its location, whilst not perfect, would provide future occupants with a choice of transport modes, and measures can be secured to encourage people to prioritise the use of sustainable transport modes... The area's character would not be maintained, but the proposal seeks to strike a balance between retaining that character and making an efficient use of land. This, together with the likely design of the scheme, leads me to consider that it does not conflict with Framework paragraph 139.... Therefore, the adverse impact of granting permission would not significantly and demonstrably outweigh the collective benefits when assessed against the policies in the Framework taken as a whole."

- ii. Land to the north of School Road, Arborfield Cross (LPA Ref: 250735)(70 dwellings including 40% affordable) (CD10.01.01 at paragraph 227, written by Joanna Carter):

*"In this instance, while the environmental harm is clear, when assessed against the policies in the NPPF taken as a whole, it is not considered that this harm is to such an extent, that it would **significantly and demonstrably** outweigh the substantial benefits of the scheme. The delivery of market and affordable housing is a key objective for the Council, and this proposal makes a meaningful contribution towards it. Therefore, the application is recommended for approval"*

Wokingham Borough Council Local Plan Update

- 4.27. The Council has submitted a Local Plan Update for examination (CD07.01). As noted at the very start of the Submission Plan (paragraph 1.8), Wokingham is a highly constrained borough:

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

- 4.28. Furthermore, the population grew by 15% between 2011 and 2021 (CS07.01 at paragraph 2.4) which is said to be the third highest rate of population increase in the South-East and the one of the highest in England. It is clear that the context has changed significantly from the situation existing when the Core Strategy was adopted in 2010. Paragraph 2.34 therefore, unsurprisingly, identifies that provision of a sufficient supply of land for new homes is a key challenge (and opportunity) of the Local Plan Update.
- 4.29. The proposed new spatial strategy involves the allocation of greenfield land for development, including new SDLs at Loddon Valley Garden Village, South Wokingham and Arborfield Green. The first of these is adjacent to the historic core of Arborfield (to the north of Church Lane) and therefore in close proximity to the Appeal Site.
- 4.30. At paragraph 4.49 of the Submission Plan (07.01) it is noted that that SDL site has capacity for around 3,930 homes, of which 2,700 would be built in the period up to 2040. If adopted, this will cause significant change to the character of the immediate locality including the historic core of Arborfield.
- 4.31. Policy SS10 (Meeting our housing needs) makes provision for 12,763 dwellings in the period April 2023 – 31 March 2040, at a rate of 751 dwellings per annum. The plan is being examined under the transitional provisions of the December 2024 NPPF, and hence the proposed rate of delivery is below the

current standard method requirement. As such there is likely to be a need for a review immediately upon adoption (pursuant to NPPF paragraph 236).

- 4.32. As identified above, the Inspector raised queries (CD07.13) about the assumptions underpinning the housing trajectory and around the infrastructure delivery costs of the proposed allocations and the extent to which these have been taken into account in assumptions around delivery timescales. The Council responded in its statement (CD07.14) setting out key milestones to be achieved in order to achieve the assumed rates of delivery.
- 4.33. For the LPU to be found sound, Loddon Valley SDL is required to start delivering housing completions by 2027/2028. This is not realistically achievable. This could impact the soundness of the plan, and the ability to deliver a 5 year housing trajectory at the point of adoption. As explained later the Council will in fact need a 6 year supply at that point due to the addition of a 20% buffer.
- 4.34. In April 2025 the Examining Inspector wrote to the Council (CD07.13) noting “particular concerns about the delivery of housing”, and sought further information on the timescales for progressing this Loddon Valley Garden Village SDL allocation, given the need for critical/ essential infrastructure to the cost of some £10 million and the indicative costs in the viability study of highway works (£140million), community facilities (£5.3 million), sub-station capacity upgrades (£16.8 million), sports facilities (£15.2 million), and open space (£10.6 million).
- 4.35. The Statement of Common Ground agreed between the LPA and the various landowners (CD07.49) sets out anticipated timings and milestones to achieve the projected completions by 2027.

Landowner / No. of Homes	Submit Applications	Planning Permission Granted	First Reserved Matters Granted	Pre-commencement conditions Approved	Start	First Completion
HFLl (Hybrid) Around 550 homes	By Dec 2025 Q3 2025/26	By July 2026 Q2 2026/27	-	By Dec 2026 Q3 2026/27	By Jan 2027 Q4 2026/27	By Nov 2027 Q3 2027/28
Gleeson (Outline) Around 431 homes	By Dec 2025 Q3 2025/26	By Dec 2026 Q3 2026/27	By June 2027 Q1 2027/28	By Dec 2027 Q3 2027/28	By Jan 2028 Q4 2027/28	By Sept 2028 Q2 2028/29
UoR (Outline) Around 2,799 homes	By Dec 2025 Q3 2025/26	By Dec 2026 Q3 2026/27	By June 2027 Q1 2027/28	By Dec 2027 Q3 2027/28	By Jan 2028 Q4 2027/28	By Sept 2028 Q2 2028/29
Seal, Brazil, Foxcroft (Outline) Around 150 homes	By Dec 2028 Q3 2028/29	By Dec 2029 Q3 2029/30	By June 2030 Q1 2030/31	By Dec 2030 Q3 2030/31	By Jan 2031 Q4 2030/31	By Sept 2031 Q2 2031/32

- 4.36. The applications submitted to date do not include the site (Hatch Farm – HFLl) which is anticipated to bring forward those first housing completions. To achieve completions by November 2027 it was anticipated that a hybrid application would need to be determined by July 2026. No application has been submitted as at 4 February 2026 so this timeframe is unrealistic.
- 4.37. Two live applications relating to the UoR and Gleeson parcels of the site were submitted in Q3 2025 and are pending determination (CD12). Whilst the SANG provision is subject to a detailed application (CD12.02), the proposed housing is included within the outline part of each application, CD12.07) such that any grant of permission for that element will need to be followed with reserved matter applications (and discharge of pre-commencement conditions) prior to commencement.
- 4.38. It is clear that the delivery assumptions remain to be tested as part of the Examination in Public process and following review of the application proposals by statutory consultees and the public. No statutory consultee responses are available on the application files so it remains to be seen whether the applications are acceptable as submitted. It also remains to be seen whether all proposed allocations are deliverable in the time envisaged,

whether the housing trajectory is achievable and ultimately, whether the Local Plan Update will be found to be a sound strategy to meet identified needs.

- 4.39. In the recent Blagrove Lane appeal decision (CD10.05.01 (dated 29 May 2025) the inspector commented (at paragraphs 18 and 19) on the likely timeframes for adoption of the Local Plan Update:

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

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

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

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

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

- 4.41. Annex 2 to this Proof provides analysis of the progress made in bringing

forward the Local Plan Update (“LPU”). In summary, I do not consider that the LPU could be said to be at an ‘advanced stage’. Stage 1 hearings have been conducted, and Stage 2 hearings are scheduled to be held between 17 March and 26 June 2026 (CD07.51). The Inspector recently set out the Matters, Issues and Questions for the Stage 2 hearings (CD07.52). There are significant issues still to be examined and I do not consider it likely that the LPU will be adopted before December 2026. It is clear that no new plan will be adopted before this appeal is determined. I cannot prejudge at this stage whether the Examining Inspector will consider the spatial strategy and proposed policies to be sound or whether Main Modifications can achieve a sound plan. As the LPU delivers less than 80% of current identified housing needs, the Council will need to commence and immediate review immediately upon adoption.

4.42. The list of MIQs for the Stage 2 hearings (CD07.52) makes clear there are a number of key issues still to be examined in detail, including:

- i. Are the spatial strategy and overall distribution of development justified by the evidence base and is this consistent with national planning policy?
- ii. Is the settlement hierarchy appropriate and consistent with the evidence base? Are all of the settlements listed in the correct level within the hierarchy?
- iii. Is the Council’s Settlement Boundaries Review [OD2] robust and based on a consistent methodology?
- iv. Is it justified and consistent with national planning policy to require ‘exceptional circumstances’ to be demonstrated to permit development outside of settlement boundaries?
- v. Is the proposed policy approach towards the development in the vicinity of AWE justified and consistent with the evidence base?
- vi. Do Policy SS13 and the development guidelines at Appendix C of the Plan provide a suitable framework for the delivery of the SDL? Is the policy wording clear, and are the proposed requirements justified and likely to be effective?
- vii. Are the proposed settlement boundaries for the LVGV SDL justified?
- viii. Is the sequential and exception testing that has been undertaken for

the Plan robust and consistent with national planning policy?

- ix. Have the site allocations been appraised and selected, in comparison with possible alternatives, using a robust and objective process?
- x. Will there be at least a 5 year supply of deliverable housing land on adoption of the Plan?
- xi. Has the cumulative impact of all development anticipated during the plan period on infrastructure, such as water supply and wastewater and facilities for education and health, been taken into account in the Plan? Is this demonstrated in the evidence base, and what mitigation will be put in place to ensure that any adverse impacts are satisfactorily addressed?
- xii. Is the policy consistent with national planning policy, particularly in respect of the application of the exception test and the circumstances in which site-specific flood risk assessments are required?
- xiii. Is the policy approach, that the character and distinctiveness of landscapes is protected and enhanced, justified in all circumstances?

- 4.43. I note that in a recent appeal determined by the Secretary of State, (Land to the south of Gazelle Close, Winnersh: LPA Ref 230099; Appeal Ref: APP/X0360/V/24/3339712) (CD10.14), limited weight was afforded to Wokingham's emerging Local Plan, which was at that time about to commence Stage 1 hearings (with Stage 1 hearing being held in November 2025, just after this decision was issued in October 2025). At paragraph 11 of the Secretary of State's decision the view was preferred that the plan carried limited weight:

"The Secretary of State notes that the emerging Local Plan Update is not expected to be formally adopted until the summer of 2026 (IR50). Having regard to the early stage of preparation, he agrees with the Inspector at IR50 that the policies in the emerging Local Plan Update carry limited weight."

- 4.44. The Inspector's corresponding finding (at IR50) was set out in June 2025 (when making their recommendation to the Secretary of State) read as follows:

"Emerging Development Plan Policy

50. The Council has commenced work on the preparation of a new Local Plan

(the 'Local Plan Update' (LPU)) for the period 2023 to 2040. The Proposed Submission Plan was subject to a Regulation 19 consultation process between 30 September and 13 November 2024. The draft Plan was submitted to the SoS for examination on 28 February 2025, with the associated hearing sessions expected to take place from May to October 2025. At this stage, the LPU is not expected to be formally adopted until the summer of 2026. In paragraph 2.2 of the SoCG between the applicant and the Council as LPA these parties agree that the policies contained within the LPU carry limited weight at this stage. I share that view."

- 4.45. It is accepted that Stage 1 hearings have now been completed and so matters have marginally moved on since the above Inspector's comments and indeed the Secretary of State's decision. However, I do not yet consider that the emerging Local Plan could be said to be at an 'advanced stage' and would still only afford limited weight to these emerging policies. The Stage 1 hearings involved legal compliance matters, and a high-level review of soundness in terms of delivery assumptions for two SDL sites. Only at Stage 2 will the soundness of the plan be examined in full, such that there would be clarity on the extent to which Main Modifications are required prior to adoption. As such, I do not consider the plan to be at 'advanced stage' as yet and there is no certainty that the plan will be adopted by the end of this year. As set out in Annex 2, Stage 2 examination hearings are scheduled for March to June 2026. Based upon the timescales of the examinations of other Strategic Local Plans, the earliest realistic adoption for the Local Plan Update is December 2026 and a date up to February 2027 may in fact be more realistic.
- 4.46. In forming that view I have regard to an appeal decision which considered the weight to be afforded to what was then the emerging Tunbridge Wells Local Plan (now subsequently adopted). That appeal site is 'Land Adjacent to Turnden, Hartley Road, Cranbrook; LPA Ref 20/00815/FULL; Appeal Ref: APP/M2270/V/21/3273015 (CD11.08). In that case, the emerging Local Plan had completed Stage 3 hearings, and further consultation on specific matters had been carried out.
- 4.47. In that decision the Secretary of State commented as follows:

“23. The Secretary of State has considered the representations and the views of parties in relation to the weight of the eLP and its site allocation policy and draft allocation. She has taken into account that the Inspector did not make any comments on site allocation Policy STR/CRS1 (the Strategy for Cranbrook and Sissinghurst parish), or draft allocation AL/CRS3 (Land at Turnden) or suggest that any modifications were required in respect of these site allocation policies, and that the further consultation which was carried out by TWBC in January-April 2024 therefore did not propose any modifications to these site allocation policies. She does not agree with CPRE’s suggestion that the Inspector’s lack of comment on draft allocation AL/CRS3 has no significance. While the eLP may of course still be subject to change, she considers that, on the basis of the evidence currently before her, Policy STR/CRS 1 and draft allocation AL/CRS3, which are of most relevance to this application, are unlikely to change. Furthermore, she considers that Policy STR/CRS 1 and draft allocation AL/CRS3 are consistent with the relevant policies in the Framework. In the particular circumstances of this case, she therefore considers that policy STR/CRS 1 and draft allocation AL/CRS3 of the eLP are most relevant given they propose to allocate housing at the application site and carry significant weight. As they are emerging policy and do not form part of the adopted development plan, they do not carry full weight. She considers the other emerging policies of the eLP carry moderate weight in this case.”

- 4.48. The Tunbridge Wells LP was significantly further through the examination process than is the case presently in Wokingham. The examining Inspector at Tunbridge Wells had given clear indications on those parts of the plan which were appropriate and those that needed changing. This position has not been reached for Wokingham’s plan and therefore I consider it carries limited weight at most.

National Planning Policy Framework

- 4.49. The National Planning Policy Framework (NPPF) (CD08.01) was most recently updated in February 2025. It is a material consideration of particular standing in the determination of planning applications.

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

- The presumption in favour of sustainable development
- Decision making taking
- Delivering a sufficient supply of homes
- Promoting sustainable transport
- Achieving well-designed places
- Meeting the challenge of climate change, flooding, and coastal change
- Conserving and enhancing the natural environment.

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

Economic Role

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

4.53. The scheme further addresses the economic role in terms of construction expenditure and jobs and increased expenditure in local area.

Social Role

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

Environmental Role

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

Decision Taking

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

Delivering a Sufficient Supply of Homes

- 4.59. Paragraph 61 sets out the Government's objective of significantly boosting the supply of homes while throughout the NPPF the importance of affordable housing is highlighted (paragraphs 11dii, 63, 64, 65, 66, 67, 71, 76, 82, 154f, 156 and 157).
- 4.60. Paragraph 62 sets out the approach to determining the minimum number of homes needed, which should be informed by a local housing need assessment conducted using the standard method in national planning guidance as a starting point, with alternative approaches only being justified in exceptional circumstances. It also adds that any needs that cannot be met

within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.

- 4.61. Paragraph 72 sets out the need to provide a five-year supply of deliverable sites for housing. It also requires sites or broad locations for growth for years 6-10 and beyond.
- 4.62. The Appeal Scheme proposes for up to 111 dwellings which would make a material contribution towards the substantial shortfall in supply. In the circumstances of this case, it represents a material consideration of substantial weight in support of the Appeal Scheme.
- 4.63. The Appellant's will work with the Council in seeking to agree Housing Land Supply Statement of Common Ground, based upon the most up to date information.

Promoting Sustainable Transport

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

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

- 4.66. The Appeal Site is located in a sustainable location adjacent to a smaller settlement but with walkable access to the services and facilities of Arborfield Cross, and with regular bus service to larger settlements (Reading and Wokingham). The feedback from the Highway Authority demonstrates the acceptability of the Appeal Scheme in sustainability terms. Accordingly, the Scheme is consistent with section 9 and paragraph 110 of the NPPF and the vision-led approach in paragraph 115.

Achieving Well-Designed Places

- 4.67. Section 12 sets out the approach to achieving well-designed places.
- 4.68. Paragraph 131 states that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. It is added that good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.
- 4.69. Paragraph 136 adds that trees make an important contribution to the character and quality of urban environments, with planning policies and decisions to ensure opportunities are taken to incorporate trees within developments. The outline scheme incorporates a number of trees.
- 4.70. The Design and Access Statement and Landscape Appraisal submitted with the Application detail the overall design response. Further detail can be secured at the reserved matters stage.

Meeting the Challenge of Climate Change, Flooding and Coastal Change

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

Natural Environment

- 4.73. Section 15 sets out the approach to conserving and enhancing the natural environment.

-
- 4.74. Paragraph 187 states that planning policies and decision should contribute to and enhance the natural and local environment including by inter alia, protecting and enhancing valued landscapes in a manner commensurate with their statutory status of identified quality in the development plan.
- 4.75. Paragraph 193 sets out the approach to avoiding significant harm to biodiversity when determining planning applications. Sub-paragraph (c) states that development resulting in the loss or deterioration of irreplaceable habitats (such as veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists. Footnote 70 provides that such reasons may include circumstances “where the public benefit would clearly outweigh the loss or deterioration of habitat.”
- 4.76. The Appeal Site is not a valued landscape, there would be no deterioration of irreplaceable habitat, and the Scheme delivers a net gain in biodiversity and additional tree planting.

Historic Environment

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

NPPF Tilted Balance

- 4.78. In the meantime, for the purposes of decision-taking, and this Appeal in particular, the lack of an up-to-date plan means the presumption in favour of sustainable development (paragraph 11(d) NPPF) is engaged. The policies which are most important for determining the application are out-of-date due to their inconsistency with the NPPF's objective of significantly boosting the supply of housing. Even if that application were determined in the short term, allowing development to come forward on the Hall Farm/Loddon Valley SDL site as proposed, this would fundamentally change the context of this appeal

Site and introduce new homes, primary and secondary schools, play spaces and local shops and employment I very close proximity / walking distance to the appeal Site (as shown on the plan at CD12.03 and CD12.09)

- 4.79. As the tilted balance of paragraph 11d is engaged, planning permission should be granted unless there is a “strong reason for refusal” on footnote 7 grounds (which does not arise here)), or “any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination”.
- 4.80. As outlined throughout this Proof of Evidence the Scheme delivers a number of significant benefits that clearly outweigh the conflict with the spatial strategy and the other identified harms, including harm to the landscape character and loss of a very small area of good quality agricultural land. The proposal accords with relevant development management policies.
- 4.81. The Minister of State for Housing and Planning recently determined an appeal relating to land east of Hayes rive and North of Church Lane, Three Mile Cross (CD10.07). The effect of that decision (which dismissed an appeal for up to 148 homes on land in proximity to the AWE facility) re-emphasises the constrained nature of the borough, and that land will not come forward for residential development in affected areas. At paragraph 39 of his decision, the Minister took the view that the contribution to housing land supply and affordable housing, in that case, **each** carried **very substantial** weight. The Inspector’s decision, at 15.74, notes that recent changes to housing targets caused “a 78% overnight increase in housing need.” She acknowledged the practical difficulty in addressing this, but was clear that “it [the difficulty] does not diminish the actual need.” She also noted that there had been a surplus of housing completions and a strong record over performance over the Core Strategy period since 2006, but was clear that “Nevertheless, the requirement is essentially forward facing and the bottom line is that the housing land supply position is very weak.” (para 15.75 of inspector’s decision). Gong on to consider the prospect of the emerging plan addressing that need:

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

4.82. In the recent appeal decision APP/X0360W/25/3364304 (Land between Lodge Road and Tape Lane, Hurst) (decided 9 October 2025) (CD10.06), the Inspector considered the housing land supply shortfall (at 2.5 years’ supply) to be a “significant shortfall” and in that case, he gave the proposals’ conflict with the spatial strategy only moderate weight.

4.83. In the 2024 Appeal Decision APP/X0360/W/24/3340006 (Land west of Trowes Lane and north of Charlton Lane, Swallowfield RG7 1RT), (CD10.03) 81 dwellings were allowed. As per the inspector at paragraph 53 of the decision:

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

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

Affordable Housing Needs

- 4.85. The Appeal Scheme proposes the on-site provision of up to 44 affordable dwellings, which amounts 40% of the total number of dwellings to be provided, which is compliant with Development Plan Policy CP5.
- 4.86. Annex 3 to this Proof provides more detail on affordable housing needs in Wokingham, and Arborfield specifically as well as relevant guidance and policy on supply of affordable housing. In summary, the need for affordable housing is acute and worsening.
- 4.87. As per the detail set out in that Annex, there is a significant need for affordable housing which continues to grow and which has not been addressed by the level of affordable housing provision in the Borough. Insufficient new affordable homes have been completed in the Borough to off-set the increased demand for such properties which has resulted in the size of the housing register remaining broadly constant. The housing register shows there is as very significantly **greater demand** for affordable homes in Arborfield & Newland Parish compared to the Borough as a whole. Annex 4 contains an FOI Response illustrating the demand in Arborfield.
- 4.88. The need for affordable housing and importance is emphasised in many Government publications, including:
- Building the Homes We Need ministerial statement by the Deputy Prime Minister on 30th July 2024 (CD08.02)
 - Written Ministerial Statement made by the Minister of State for Housing and Planning on 12 December 2024 (Publication of new NPPF). (CD08.03)
- 4.89. The provision of 44 affordable homes on the Appeal site² in the right location for affordable needs is a **benefit of substantial weight**, especially as it is over

² Equates to 39.6%

10.8%³ of the Borough's annual affordable need. The Appeal Site benefits from good accessibility with frequent bus service which provides scope for the occupants of the affordable housing which will come forward on this Site to access job opportunities in Reading, Wokingham, the Science Park and at Arborfield Green.

- 4.90. Based on the evidence provided, there can be no doubt that there is an acute and worsening need for affordable housing in Wokingham Borough. The evidence set out above emphasises that the provision of affordable housing should be afforded **substantial weight** in the overall planning balance. This proposal includes a level of affordable housing provision at 40%, consistent with that required by policy. This is a significant benefit of the appeal scheme given the ongoing unresolved affordable housing needs as indicated by the Council's housing register. The most recent information on this shows 1,204 households on the register, which is 1.7% of the Borough's households as confirmed in the 2021 Census.
- 4.91. The delivery of 44 affordable homes in a sustainable location where there is significant demand is a material consideration of **substantial weight** in favour of the grant of planning permission.

³ 44 of 407

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

Decision Making Context

- 5.1. Wokingham is a borough with only 2.3 years' housing land supply⁴ and significant levels of unmet need for both market and affordable housing. There is a shortfall of 3,733 dwellings in the 2025-2030 five-year period with a deliverable supply of only 3181 dwellings against a requirement for 6914. Freedom of Information Act request responses show that there are 669 requests for an affordable home in Arborfield. There is significant unmet and growing demand for affordable housing in Arborfield & Newland parish, and there is very significantly greater demand for affordable homes in Arborfield & Newland Parish compared to the Borough as a whole.
- 5.2. This appeal proposes the delivery of up to 111 dwellings in a sustainable location, in Arborfield, which benefits from access to a range of services and facilities within walking/cycling distance and also via the good quality existing bus service which serves the Site. The Site represents an ideal opportunity for reducing the significant scale of the housing (including affordable housing) shortfall.
- 5.3. Although there is a degree of conflict with the Development Plan, the weight to be attached to this conflict is limited. In particular, the proposal conflicts with the settlement boundaries established under policies CP9 and CP11 of the Core Strategy ("CS"), CC02 of the Managing Development Delivery Local Plan ("MDD") and AD1 of the Arborfield and Barkham Neighbourhood Plan ("NHP"). The weight afforded to this conflict is limited because (i) the development plan is out of date in terms of the spatial application of its housing policies ; and additionally, (ii) the Council is unable to demonstrate a five-year supply of deliverable housing land.
- 5.4. Either of scenarios (i) or (ii) above triggers the presumption in favour of sustainable development at paragraph 11(d) of the NPPF. In so far as there

⁴ Noting the Council claim there is no more than 2.5 years' supply.

are no strong reasons for refusal at paragraph 11(d)(i) of the NPPF, the Appeal falls to be positively assessed under paragraph 11(d)(ii).

- 5.5. The adverse impacts of granting planning permission relating to (a) development beyond a defined settlement boundary (delineated in an out-of-date development plan), (b) localised landscape impact; and (c) loss of agricultural land, would not significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination
- 5.6. The Council accept they are unable to demonstrate a five-year supply of deliverable housing sites, contrary to the requirement set out in paragraph 78 NPPF. By the Council's calculation they have only 2.5 years' supply. By the Appellant's calculations, this is in fact only 2.3 years' supply, based on some of the sources of supply being undeliverable pursuant to the relevant NPPF definitions. In either case, there is clearly a critical need for more housing in Wokingham. The shortfall, in the immediate 2025 – 2030 period, is 3,733 homes (or 3,461 according to the Council's calculation). The current spatial strategy (Core Strategy) dates to 2010 and planned for delivery of 13,230 dwellings in the period 2006 to 2026 (as per Policy CP17). Accordingly, it predates the first introduction of the NPPF in 2012, and the subsequent revocation of the South-East Plan. Notably, this level of delivery was based on the historic South-East Plan targets and a backlog which had arisen from the older Structure Plan which persisted at the point of adoption (as per para 4.77 CS). It is patently clear that the Core Strategy is out of date, fails to grapple with housing needs as they currently exist, and fails to deliver an NPPF compliant strategy for meeting those needs.
- 5.7. The development limits and settlement boundaries in the Development Plan flow from that dated spatial strategy and the assessment of housing need as it existed at that point in the past. The Development Plan neither identifies nor addresses objectively assessment housing needs for market or affordable housing. It fails to deliver on the NPPF's objective to significantly boost the supply of housing. The Council accepts that in order to meet objectively

assessed housing needs, it will be necessary to breach those historic settlement limits. Its Submission Local Plan Update proposes delivery of new housing development beyond those settlements on greenfield sites. One such location proposed for accommodating growth is the expansive area of land to the north of Arborfield, in close proximity to the Site.

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

Main Issues for Determination

- 5.10. The main issues for determination in this appeal, as set out in the Inspector's Post CMC Note (19 January 2026) (CD22.04) are:
- i. Whether the proposed development is in a suitable location having regard to local and national policies in relation to the location of housing.
 - ii. The effect of the proposed development on the character and appearance of the surrounding area.
 - iii. Whether the quantum and scale of development is acceptable.
 - iv. Whether the proposal would be sustainable development, having regard to its location and the opportunities for sustainable travel.
 - v. The effect of the proposed development on the nearby watercourse with particular regard to flooding and water quality. In relation to this matter the parties should base their evidence on the Environment Agency's most

recent advice and flood maps.

vi. Whether any potential adverse effects on the integrity of the Thames Basin Heaths SPA would be adequately mitigated.

vii. Whether the proposal would prejudice the delivery of Loddon Valley Garden Village for reasons of highway capacity.

viii. The overall planning balance.

1.9. Additional matters to be covered in this planning evidence include the issue of Best and Most Versatile Agricultural Land, biodiversity net gain and ecology, and the matters covered by the s106 planning obligation.

Issue1: Whether the proposed development is in a suitable location having regard to local and national policies in relation to the location of housing. (*Decision Notice Reason for Refusal 1*)

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

- CS CP1 (Sustainable Development).
- CS CP2 (Inclusive Communities).
- CS CP3 (General Principles for Development).
- CS CP6 (Managing Travel Demand).
- CS CP9 (Scale and Location of Development Proposals).
- CS CP11 (Proposals Outside Development Limits).
- MDD CC01 (Presumption in Favour of Sustainable Development)
- MDD CC02 (Development Limits).
- TB21 (Landscape Character).
- A&BNHP IR1 (assumed to be IRS1 - Preservation of Separation of Settlements).
- A&B NHP IR2 (assumed to be IRS2 – Recognise, Respect and Preserve Identity and Rural Setting of Settlements).
- A&B NHP AD1 (New Development within Development Limits)
- Borough Design Guide SPD
- NPPF sections 2, 4, 8, 9, 12 and 15.

5.12. It is accepted by the Council that the Development Plan's settlement boundary policies are out-of-date.

5.13. In the Land north of School Road application (LPA Ref 250735) Joanna Carter, in her officer report (CD10.01.01), said:

"34. As a result of the Council's 5YHLS position, those policies relating specifically to housing delivery in the Core Strategy and MDD LP are currently considered to be out of date. This does not mean they have no weight, but an assessment of consistency will take place throughout this application." *"35. The ABNP was "made" more than five years ago, therefore, its policies relevant to the delivery of housing are considered "out of date". This does not mean they attract no weight, however, the weight attributed to the conflict with these policies will normally be lower than it would otherwise be."*

5.14. The officer's report for this Appeal Scheme (CD03.02 at page 12) made a similar comment:

"The latest published Five-Year Housing Land Supply Statement (at 31st March 2023) shows the Council is currently able to demonstrate 1.7 years' worth of deliverable sites. Subsequently, those policies relating specifically to housing delivery in the borough's Core Strategy and MDD LP (and any made Neighbourhood Plans) are currently considered to be out of date. This does not mean they have no weight, but an assessment of consistency will take place throughout this application."

5.15. Policy CP17 of the CS (delivery of housing) is manifestly out of date, being based on historic South-East Plan housing targets coupled with backlogs accrued under the Berkshire Structure Plan. The settlement boundaries in the Development Plan (CP9 and CP11) are aligned to the CP17 level of housing provision and as such they are also manifestly out of date. Furthermore, there is only 2.3 years' housing land supply (or, in the Council's view, 25. Years) which, as per footnote 8 NPPF, renders the most important policies out of date for the purposes of paragraph 11(d) NPPF. The tilted balance is clearly

engaged; a point agreed between the parties (as recorded in the officer's report pages 13 and 29 of 36)

- 5.16. When recently allowing the appeal at Blagrove Lane (APP/X0360/W/24/3354667) (May 2025) (CD10.05.01) the Inspector noted that Policy CP17 of the Core Strategy sought to deliver on the requirements of the abolished South East Plan (paragraph 9) and that this was prior to first publication of the NPPF in 2012 (paragraph 14). Notably, the NPPF:

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

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

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

17. I note the borough’s housing requirement rose due to last December’s Framework publication, but even prior to that appeal decisions show a progressively declining supply of deliverable sites (ranging from 4.84 years to 3.2 years pre-December 2024 Framework) against either a four or five year minimum as dictated by the Framework at the time of each decision. I put this

down to the development plan coming towards the end of its plan period and delivering on what was a lower housing requirement, albeit one that was not a ceiling. Furthermore, planning permissions have been granted for housing schemes outside of the borough's settlement limits. Hence, the current supply position is not solely down to the national policy change, which has only seen the supply position decline further.

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

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

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

- 5.17. it is agreed, therefore, as per the reasoning above, that policies CP9, CP11, CP17 and MDD Policy CC02 are out of date as they fail to meet objectively identified housing needs. They frustrate delivery of identified housing needs.
- 5.18. The defined settlement limits are a spatial planning policy tool. Whilst the Site is detached from the defined settlement limit of Arborfield Cross, it is, in fact, adjacent to/attached to a defined settlement when experienced on the ground;

this is the settlement of Arborfield as defined in the statutory development Plan (CD06.03 at paragraph 4.6(b)) and supporting Village Design Statement (CD06.04). This settlement is the historic core of Arborfield; the 'original settlement'. The Development Plan (the NHP) against which this Appeal is to be assessed) clearly identifies Arborfield (and the collection of houses around Church Lane) as a settlement in its own right. The NHPs view on the identity of settlements should take priority over the out-of-date settlement limits or indeed the evidence being prepared for the Local Plan Update (noting the Settlement Hierarchy 2024 does not identify Arborfield's historic core as a defined settlement in its own right). The Development Plan carries more weight than the emerging, as yet untested, Local Plan Update.

5.19. We note that the Council has been content to approve other proposals *adjacent* to the settlement boundaries of Arborfield Cross and Arborfield Green (CD10.01 and CD10.02) but not this Site – and that is because the Appeal Site is *detached* from a settlement. That is to say, the Council supported speculative applications which abut *defined settlement boundary limits*, but not a scheme which is divorced from these out of date settlement limits (even where it abuts an existing settlement). This shows excessive continued emphasis, and indeed reliance, by the LPA, on the historic spatial strategy which has already been found to be manifestly out of date.

5.20. This Site is adjacent to existing built form, including residential dwellings on Church Lane and Reading Road. The Council's landscape architect's response recognised there is development on three sides of the site (when discussing the fact the area has a settled character, albeit at lower density) (CD2.22):

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

5.21. The Appeal Site is clearly not a remote countryside location which is divorced

from built form. It is situated in an area which the Council's own landscape officer says has a settled character.

- 5.22. The settlement boundaries are frustrating the delivery of much needed housing (to use the wording of the inspector in the Blagrove Lane appeal – CD10.05.01).
- 5.23. It is clear that the Council continues to rely upon its out-of-date settlement limits when deciding how to address the housing shortfall via decision taking. Those speculative applications which are adjacent to settlement limits appear to have been received more favourably than those which are divorced from the same. As such it appears that the Council's position is that it will not support speculative applications which are divorced from a settlement limit. This is borne out in comments in the officer's report, as follows.
- 5.24. As recorded at page 29 of the officer's report (CD03.02) the LPA's planning department have an 'in principle' objection to development in this location, outside a settlement boundary. The officer's report states (third paragraph on page 29) that the site is in "the wrong location" and "This is an underlying fundamental disbenefit of the scheme that cannot be overcome." (my emphasis added)
- 5.25. This reference to an inability to overcome the 'poor' location makes clear that the LPA have placed a significant amount of weight on the location beyond the settlement boundary (and divorced from the settlement limit), suggesting that no alternative form of development could have been acceptable on this Site. This is in direct contrast to the inspector's comments in the Blagrove Lane appeal (CD10.05.01 at paragraph 19), that the settlement boundaries are 'frustrating delivery of housing at the level that is required' and that a conflict should be afforded only moderate weight in the planning balance.
- 5.26. In this case, there is little analysis in the officer's report of the actual settlement morphology on the ground and an absence of assessment of the impact of the proposal on settlement morphology. Questions of how the proposal would relate to the existing settlement pattern at Arborfield, and whether it would it abut existing residential development are neither identified, nor addressed. At

the top of page 9 (C03.02) the officer opines that “there is no cohesive settlement in the locality of the site” and rather that the housing on Church Lane is simply ‘low density housing’ (but not a settlement). This contradicts the Neighbourhood Plan (which forms part of the Development Plan) analysis set out above and indeed that in the Village Design Statement.

- 5.27. As the Local Plan Update proposes significant growth at the Loddon Valley Garden Village Strategic Development Location (SDL) (see Settlement Hierarchy 2024 CD07.22 at page 8) it is possible that this settlement (Arborfield) will see significant growth on its northern side, bringing forward new schools, commercial space and housing in close proximity to the Appeal Site. The Council’s planning policy officer, in their consultation response on this application (CD02.20) noted that this SDL if adopted would be in proximity to the Site. However, their view was that this Appeal Site would not form a logical visual or spatial extension to that SDL because of the scale and layout of the properties along Church lane, Arborfield (that is, the existing Church Lane dwellings are large detached dwellings in large plots, fronting Church Lane, whereas the Appeal Scheme would be at higher density and would address Reading Road rather than Church Lane). Whilst these matters of design and character/ appearance are relevant to the reasons for refusal, it is helpful to note at this point that the essence of that consultation response is a recognition that the Appeal Site is adjacent to existing built form along Church Lane, rather than being a remote countryside location.
- 5.28. It is clear that the Council accepts a need for new development in the countryside to meet identified housing needs. The Council proposes that a large volume of this need could be met adjacent to the historic core of Arborfield (in the Loddon Valley SDL, adjacent to Church Lane, to its north). Whilst as yet untested at examination, this is a material consideration of limited weight. This Appeal Scheme proposes that identified housing needs could be addressed on the other side of that same settlement.
- 5.29. It is further noted that applications to bring forward that SDL site have now been submitted (see CD12 for parameter and illustrative plans showing the proposed location of the new schools, district and local centres, play space and pedestrian and vehicular links through that site).

- 5.30. In conclusion the site's location beyond a defined settlement boundary is in conflict with the Development Plan (Policies CP9, CP11, CC02 and AD4) but this conflict is afforded **limited negative weight**.

Issue 2 The effect of the proposed development on the character and appearance of the surrounding area. (*Decision Notice Reason for Refusal 3*)

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

- CS CP1 (Sustainable Development).
- CS CP3 (General Principles for Development).
- CS CP9 (Scale and Location of Development Proposals).
- CS CP11 (Proposals Outside Development Limits).
- MDD CC02 (Development Limits).
- MDD CC03 (Green Infrastructure, Trees, and Landscaping).
- MDD TB21 (Landscape Character).
- NHP IR2 (assumed to be "IRS2" - Recognise, Respect and Preserve Identity and Rural Setting of Settlements)
- NHP AD1 (New Development within Development Limits)
- NHP AD3 (High Quality Development with Generous Open Space, Properly Landscaped)
- Design Guide SPD,
- the Wokingham District Landscape Character Assessment
- NPPF sections 12 and 15.

- 5.32. The Appellant's position is set out in Proof of Evidence of Mrs Clare Brockhurst. Development of the Appeal Site will avoid change occurring in respect of any protected, valued and important landscapes at both a national, borough and local scale. The Site is not an NPPF valued landscape, nor is it in an area

considered to be of value in the Council's emerging Valued Landscapes evidence base.

- 5.33. In Ms Brockhurst's evidence, landscape and visual impacts beyond the immediate environs of the Appeal Site would be minimal. The character and appearance beyond the limits of the Site will be unchanged. Any impacts are localised. The green route along Reading Road will be maintained; it will continue to be a road into a settlement, it will be lined with trees, with new tree and shrub planting to enhance this quality of the route and it will continue to be connected to and link with other GI assets ensuring the GI network is protected and enhanced. The proposals respond positively to the local landscape character and deliver new multifunctional Green Infrastructure.
- 5.34. The Council's Valued Landscape Assessment (CD07.23), prepared in connection with the Local Plan Update, proposes designation of valued landscapes across the borough but does not include the Appeal Site in this proposal. As such, the Council clearly do not consider the Appeal Site to be a valued landscape for the purposes of paragraph 187 (a) NPPF. Landscape is not, in this case, a footnote 7 matter, and the localised change to the landscape attracts **moderate** weight in the planning balance.
- 5.35. As noted above, the Council resolved to approve the School Lane proposal (CD10.01) (70no.dwellings at Arborfield Cross) despite not only a higher density (than the surrounding area) but also the site's position within the proposed 'valued landscape' area. Even when placing significant weight on those factors (see paragraph 220 officer's report CD10.01.01), these harms did not significantly and demonstrably outweigh the various benefits including 70no. homes. It is also notable that the Joanna Carter's view was that the site was 'sub-optimal' in locational terms and still somewhat reliant on the private car (see paragraph 220 of report at CD10.01.01).
- 5.36. As accepted elsewhere in this proof of evidence, policies CP9, CP11, CC02 and AD1 (referenced in regard to reason for refusal 3 as well as reason 1) are not met due to the location beyond the settlement boundary.
- 5.37. Policy CP1 requires that the high quality of the environment be maintained or

enhanced. As detailed in the Proof of Evidence of Mrs Clare Brockhurst, important landscape features have been identified, (including the trees, hedgerows, grassland and grain and form of the contemporary settlement edge) and key features have been retained and incorporated in to the proposals, which addresses the requirements of CP1, CP3 and also Policy TB21 (which requires that proposals retain or enhance the condition, character and features that contribute to the landscape).

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

accordance with the specified standards and these are met and exceeded. 12,660m² of public open space is delivered on the part of the Site to the east of the 'Main River' which runs broadly north-south to the west. This compares to a policy requirement for 12,412m².

- 5.42. The Appellant's position is that the impact on landscape and character, which conflicts with CC03, TB21 and IRS2 attracts **moderate negative weight**. However, opportunities do arise to introduce additional supplemental planting to enhance green infrastructure on the Site. Furthermore it is a **significant benefit** of the Scheme that it allows for delivery of housing on a Site which is not a valued landscape, thereby reducing pressure on other more valued parts of the borough.

Issue 3: Whether the quantum and scale of development is acceptable
(Reason for Refusal 2)

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

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

- 5.44. The Council's landscape officer's opinion (CD02.22) on the character of the area was as follows:

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

- 5.45. Thus, whilst she accepted that the area to the north, west and south (Reading Road) of the Site was settled (as opposed to undeveloped, open land), she considered the scale of existing development to be lower density/heights to that now proposed. The planning policy officer’s comments (CD02.20) similarly states that the Appeal Site is adjacent to large dwellings in large plots along Church Lane.
- 5.46. The proposed quantum of development (up to 111no dwellings on this 6.44ha site) equates to 17.3 dwellings per hectare gross/ 28.5 dwellings per hectare net. The landscape principles/design principles set out in the Application Documents identify that at reserved matters stage, building heights should be a maximum 2.5 storeys so as to tie in to the surrounding built form (as per section 6.2 of Landscape and Visual Appraisal submitted with the application (CD01.12) and page 31 of the Design and Access Statement, CD01.04). The Design and Access Statement set out an analysis of prevailing building heights in surrounding roads, with photos of existing built form, which underpinned this.
- 5.47. The Council suggests that prevailing densities on Waldren Ave are 11dph and just 4ph on Church Lane. Given the significant housing land shortfall, a net density significantly lower than 28dph (that is to say, a density of say 4 or 11 dph) on the development plots would fail to make efficient use of this land resource.
- 5.48. Notably Joanna Carter recommended approval of the School Lane proposal (CD10.01.01 at paragraphs 47 – 49) approximately 1km east of the Site (and the committee followed this recommendation). This was despite a density of 22dph (70 dwellings on 3.21 net developable area) which was acknowledged as being higher than the prevailing character of Arborfield Cross, at 18dph (excluding open space/ non-residential areas). Significant weight was given to

the harm to the setting of the village (in landscape and character terms) but this (along with other harms such as loss of valued landscape and a highways objection) did not significantly and demonstrably outweigh the benefits of delivery of 70no. homes.

5.49. The requirements, in CP1, for high quality environments and attractive functional schemes can be met, as shown on the Illustrative Masterplan (CS23.01). Policy CP3 requires that development be of an “appropriate scale of activity, mass, layout, built form, height, materials and character to the area together with a high quality of design without detriment to the amenities of adjoining land users including open spaces or occupiers and their quality of life.” It is considered that the scale of development (up to 111 dwellings) can comfortably be accommodated on this 6.44ha Site at a scale and massing which is not out of keeping with the surrounding area and which will not impact their amenity. At least 12,660m² of public open space will be delivered (in excess of the policy requirement) which does not include the additional triangular area to the west of the Site which would also be utilised for green infrastructure. A childrens’ play area is also proposed as shown on the illustrative plan. The requirements of Policy CC03 (Green Infrastructure, Trees and Landscaping) are met, and in accordance with Policy TB21, and as outlined in the Proof of Evidence of Mrs Clare Brockhurst, the proposals enhance the condition, character and features which make an important contribution to the landscape. There will inevitably be a change to the rural setting of Arborfield (IRS2) which is addressed below, in relation to reason for refusal 3. The requirement for ‘high quality development with generous open space, properly landscaped’ (Policy AD3 NHP) is also met.

5.50. In conclusion, the scale and quantum of development is considered appropriate on this Site. Based upon the proposed maximum quantum of development, there are opportunities to bring forward a high quality design and layout at Reserved Matters stage consistent with the NPPF’s stated ‘fundamental’ aim of creating “high quality, beautiful and sustainable buildings and places.” (NPPF paragraph 131). In accordance with NPPF paragraph 135, the proposed quantum is such that the Site can accommodate a design which will function well and add to the quality of the area, and which will be visually attractive with good architecture, layout and effective landscaping. The scale

is sympathetic to local character and the landscape setting/ environment and the arrangement of streets can establish a strong sense of place. The layout optimises the potential of the site whilst supporting the creation of a high quality development which promotes health and wellbeing. As such, I afford **significant weight** to the ability to bring forward high quality design.

Issue 4: Whether the proposal would be sustainable development, having regard to its location and the opportunities for sustainable travel(Decision Notice Reason for Refusal 4)

The Council's Position

5.51. Reason for refusal 4 sets out the case officer's view that the Appeal Site is situated in an unsustainable location, by reason of the countryside location outside of defined settlement limits, and also due to the distances to facilities and services and quality of the local walking environment. On that basis the Council's position is that the Appeal Scheme would fail to encourage a modal shift towards sustainable modes of transport, and would therefore conflict with the following Development Plan policies and other material considerations:

- CS CP1 (Sustainable Development).
- CS CP2 (Inclusive Communities).
- CS CP3 (General Principles for Development).
- CS CP6 (Managing Travel Demand).
- CS CP11 (Proposals Outside Development Limits).
- MDD CC01 (Presumption in Favour of Sustainable Development).
- MDD CCO2 (Development Limits)
- Borough Design Guide SPD and
- NPPF sections 8 & 9.

5.52. By contrast, the Highway Authority confirmed they have no objection to the proposal (CD2.17, 2.18 and 2.19). As such, the LPA's decision departed from the statutory consultee's response.

5.53. In their initial response (CD02.17) the Highway Authority sought further information. A response was duly provided (CD01.22) along with a Framework Travel Plan (CD01.20), Framework Construction Management Plan

(CD01.21), Illustrative Parking Plan (appended to CD01.22), and amended Proposed Site access Drawing (CD01.26), Emergency Access Drawing (CD01.24) and Vehicle Tracking diagram (DC01.25). The amended drawings were annotated to provide more detail on pedestrian improvements and visibility splays and the access design was amended to allow for 6m (as opposed to 5.5m) width.

- 5.54. The Highway Officer then submitted a final consultation response confirming no objection to the proposal (CD02.19). That final response confirms that a) all necessary information was provided by the applicant/ appellant, b) there is access to a good bus service from the site, and c) the various contributions offered (to the Arborfield Bus Strategy/ bus stops and pedestrian routes) would be welcome additions improving the sustainability of the Site to be factored into the planning balance.
- 5.55. There is no suggestion in the Highway Officer's response that the location was considered to be unsustainable in highway terms. Indeed, the officer confirmed, during a meeting with the applicant's team that he did not consider the location to be unsustainable, given the above factors. Therefore, the planning department's view departs from the highway officer's (as statutory consultee) response.
- 5.56. Furthermore, the Council resolved to approve 70no. dwellings at School Road, Arborfield (CD10.01.01 and 02) despite finding it to be a 'sub-optimal' location in sustainability terms (see paragraph 220 officer's report at CD10.01.01) where there would continue to be a degree of reliance on private cars. In that case, that factor was afforded only moderate weight in the planning balance.
- 5.57. As set out in evidence by Mr Matthew Stevens, the Appeal Site is in an extremely sustainable location with day-to-day facilities and amenities easily accessible by active travel modes (walking and cycling). The Appeal Site is provided with direct access to a high-frequency, seven-day-a-week, bus service which provides future residents with convenient connections to a wide range of retail, employment, education and leisure destinations, as well as major multi-modal transport hubs at Reading and Wokingham rail stations

- 5.58. A package of measures have been proposed to improve pedestrian links from the Site to Arborfield Cross, along with measures to improve bus services to larger centres. These are detailed in the Proof of Evidence of Matthew Stevens.
- 5.59. It is accepted that the proposal conflicts with Policies CP11 and CC02 (which relates to the Site's location outside of the out-of-date settlement limits, as addressed above in respect to reason for refusal 1). However, the Appeal Scheme is in a sustainable location and accords with Policies CP1, CP2, CP3, CP6, CC01 and NPPF paragraphs 7 and 8 (achieving sustainable development) on sustainable development and indeed NPPF policies regarding sustainable locations, making efficient use of land, securing well designed places and providing affordable homes (as set out in NPPF footnote 9: 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.). I afford **significant weight** to the delivery of sustainable development; the Appeal Scheme provides 40% affordable housing (consistent with paragraph 66), would not result in isolated homes in the countryside (consistent with paragraph 84), is in a sustainable location and prioritises sustainable modes of transport with a vision led approach (consistent with paragraphs 110 and 115), makes efficient use of underutilised land (paragraph 129), delivers high quality design (paragraph 135) and reflects local guidance (paragraph 139).

Issue 6: The effect of the proposed development on the nearby watercourse with particular regard to flooding and water quality.
(Decision Notice Reason for Refusal 6)

- 5.60. Reason for refusal 6 suggests that insufficient information has been provided to demonstrate that the proposed development will not adversely impact on flood risk or the Main River Watercourse within/adjacent to the Appeal Site. On that basis the Council considers the proposal to be in conflict with the following Development Plan policies:
- CS CP1 (Sustainable Development).
 - CS CP3 (General Principles for Development).

-
- MDD CC10 (Sustainable Drainage).
 - NHP AD4; and
 - Section 14 NPPF.

- 5.61. The FRA and Drainage report submitted with the Application identified that the Appeal Site was bisected by a drainage ditch which is classified as a 'Main River.' As such an 8m setback was maintained in the Illustrative Masterplan to allow for ongoing maintenance. There is also a watercourse running adjacent to the southern boundary which is also categorised as a Main River. At the time of application submission, the Site lay wholly within Flood Zone 1.
- 5.62. The LLFA officer responded to confirm they had no objection to the proposed development in terms of flood risk or the drainage strategy. (CD02.11)

Water Quality

- 5.63. The Environment Agency's response (23 January 2025) (CD02.16) did not object on flooding grounds; rather it set out their objection to the proposal because in their view it would "pose an unacceptable risk of pollution to surface water quality". Elaborating on this concern about water quality matters, the EA set out concerns that the Arborfield Sewage Treatment Works is close to capacity.
- 5.64. Further information was submitted by the Applicant following direct liaison with Thames Water (CD01.23). That information confirmed that Thames Water's business plan for 2025-2030 includes upgrades and extension of capacity to accommodate growth. Thames Water expressly stated that they disagreed with the EA's response to the application, and do not consider the development would contribute to unacceptable levels of water pollution (para 187 NPPF) or adversely affect water quality.
- 5.65. The EA have since confirmed in their 27 January 2026 submission (CD17.07.02) the issue of water quality is addressed to their satisfaction, subject to imposition of a condition which prevents occupation of any of the development until the planned upgrades at the Arborfield STW are completed to ensure that there is sufficient sewerage capacity to accommodate the

development.

- 5.66. Such a condition would be unreasonable on the basis that it requires steps beyond the control of the Appellant and furthermore on the basis of the statutory duty under s94 of the Water Industry Act 1991 to provide sewage infrastructure.

Flood Risk (Fluvial and Surface Water)

- 5.67. As set out in correspondence submitted by the Environment Agency in connection with this appeal, in December 2025, the EA's Flood Maps for Planning have been updated and there are now small areas of the Appeal Site contained within Zone 2/3 (CD17.04).
- 5.68. As requested, an updated Flood Risk Assessment and Drainage Strategy has been prepared and submitted for comment (CD17.06). The updated FRA identifies that following a change to the Flood Risk Maps there is now a small area of fluvial food risk on the western Site boundary (within the vegetation on the boundary) and along the line of the Main River. No development is proposed in those areas. The boundary vegetation is to be retained, and the Main River corridor will remain in situ with an 8m set back as required. The requirement for a Sequential Test (ST) is not triggered as no development is proposed in Flood Zones 2/3. NPPF paragraph 175 states that a ST should be used in areas at risk of any form of flooding "except in situations where a site-specific FRA demonstrates that no built development within the site boundary, including access or escape routes, land raising or other potentially vulnerable elements, would be located on an area that would be at risk of flooding from any source, now and in the future (having regard to potential changes in flood risk)."
- 5.69. While there are parts of the Site which experience elevated surface water this is capable of mitigation as set out in the Drainage Strategy (CD17.04). As per the recent changes to the Planning Practice Guidance, (para 27 Reference ID: 7-027-20220825) a proportionate approach is needed in the case of surface water:

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

- 5.70. Therefore, the need for a ST is not triggered as no built development is proposed within Zones 2/3 and a site specific flood risk assessment has clearly demonstrated that occupiers will be safe from surface water flood risk for the lifetime of the development without increasing flood risk elsewhere.
- 5.71. The Council’s Drainage Officer made no objection to the proposal in terms of flood risk or drainage. The consultation response (CD02.11) recorded this point and suggested wording for a condition to refine the drainage strategy at detailed design/ reserved matters stage.

Culverting of Main River

- 5.72. The EA had also added an informative to their January 2025 consultation response (CD02.16), advising that an Environmental Permit would be required to undertake works within 8 metres of the Main River. This informative simply stated that “The applicant would need to demonstrate that the proposed works will not adversely impact on flood risk or the watercourse” and that “The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.”
- 5.73. No suggestion was made at that time (January 2025) that the EA would object to the creation of a new (or indeed alteration of existing) culvert at the Site access.
- 5.74. The officer’s report, (CD03.02 at pages 24-25) raised concerns about water quality impacts arising from the need to culvert over the drainage ditch along the southern Site boundary in order to upgrade the access into the Site. This is a matter covered by the environmental permit mentioned by the EA in the

informative on their consultation response.

- 5.75. Section 8 of Mr Terry Seymour's evidence identifies that it will be necessary to cross the Main River to access the Site. Following further onsite investigations including trial trench investigation, it has been established that the Main River at the location of the new access is contained within an existing 300mm diameter concrete culvert (as opposed to being an open watercourse). Accordingly, no new culvert (nor clear span bridge) is required, nor proposed as part of this Appeal. The new site access will be constructed as a standard road construction over the existing culvert. A cross section of the proposed access is appended to Mr Seymour's evidence at Appendix D.
- 5.76. My position therefore is that there is no unacceptable risk to water quality, or indeed in terms of flood risk, and no conflict with Development plan policy arises in this regard. The water quality issue is acknowledged to have been overcome, with Thames Water confirming sufficient waste water treatment capacity. The Updated Flood Risk Assessment takes account of the change to the flood maps and confirms no Sequential Test is required. Surface water can effectively be managed on the site (with detailed design at Reserved Matter stage). New additional culvert or bridge is required at the site access. This reason for refusal has been satisfactorily addressed. No conflict arises in respect of Development Plan Policies CP1, CP3, CC10, AD4 nor section 14 of the NPPF.

Issue 7: Whether any potential adverse effects on the integrity of the Thames Basin Heaths SPA would be adequately mitigated (Decision Notice Reason for Refusal 7)

- 5.77. The Appeal Site is within the 5km Zone of Influence around Thames Basin Heaths SPA. Regulation 63(1) of the Conservation of Habitats and Species Regulations 2017 (as amended) ("the Habitat Regulations") requires a Competent Authority ("CA") to make an Appropriate Assessment ("AA") of the implications of any plan or project potentially affecting a site with regard to the site's conservation objectives. Regulation 63(5) says that the CA may, in light of the conclusions of the AA, agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site.

- 5.78. As the Appeal Scheme is not connected with/ necessary for nature conservation, it is agreed between the parties and Natural England that the proposed population increase on the Appeal Site is likely (in the absence of mitigation) to result in significant effects on the SPA due to recreational disturbance.
- 5.79. The Council has adopted a mitigation strategy, which delivered Council-led SANG sites and provides for SAMM measures (management and monitoring) to which non-strategic sites can make a financial contribution. In order for a particular SANG to comprise suitable mitigation of impacts, the Site needs to be within the prescribed catchment of that SANG. Catchments vary depending on the size of the particular SANG. Larger SANGs can be expected to draw visitors from a larger catchment. As per the agreed Mitigation Strategy for Thames Basin Heaths SPA, the relevant catchment areas are:
- i. SANG of 2-12ha: 2km catchment
 - ii. SANG of 12-20ha: 4km catchment
 - iii. SANG of 20ha+: 5km catchment.
- 5.80. There are various SANG options for the Appeal Site, including the Council's Rooks Nest SANG and a privately owned/operated SANG known as 'The Ridge'.
- 5.81. Rooks Nest Wood SANG was approved in 2009 and opened in 2011. The Council have responded to a Freedom of Information Act Request to confirm that Rooks Nest SANG has 1.13ha of capacity remaining. (Annex 4 to this Proof). The Appeal Scheme requires 2.15ha of SANG, so if the Council's response is accurate, there is insufficient capacity to mitigate the Site's impacts in full but it could partly mitigate those impacts. The response does not provide granular detail on whether capacity is 'reserved' for particular sites, and the status of those sites, so cannot be interrogated pending further detail from the Council in evidence. Should such information be forthcoming it will be addressed in rebuttal if required. It is proposed to make a contribution to the Council towards that remaining Rooks Nest SANG capacity and also SAMM.

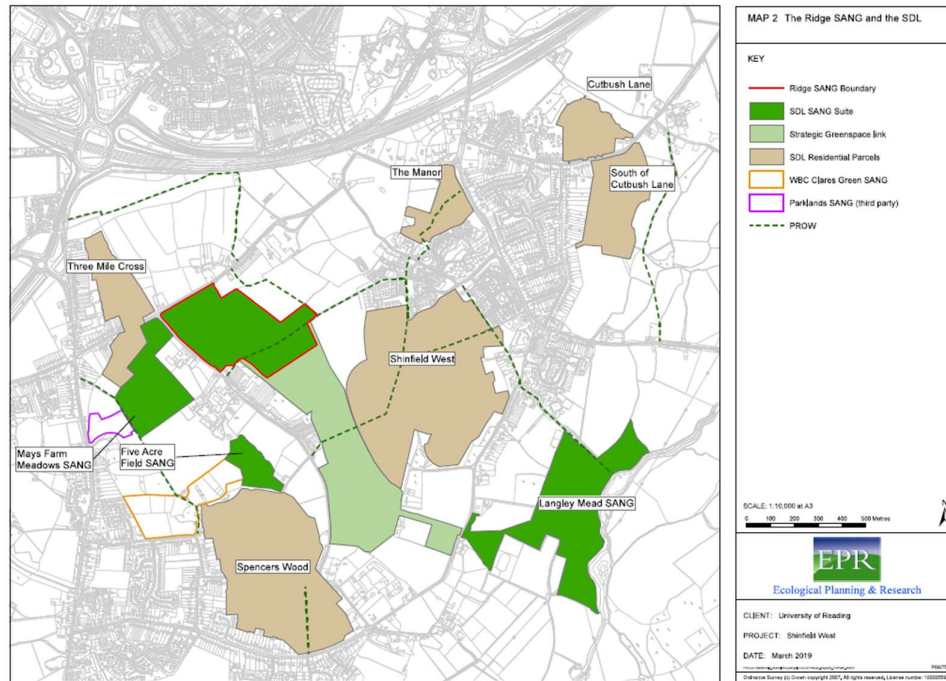
- 5.82. The Council has previously advised that they are unwilling to make this SANG available for speculative development (CD01.31). The Appellant's agent sought confirmation from the case officer whether the Council will allow the appellant to utilise the Council's SANG. In their response (6 June 2025 email from Mark Croucher) the Council state "most major application are mitigated by Rooks Nest Wood. However, where this site is outside of the WBC spatial strategy then SANG mitigation would need to be via a third party SANG. The council would not be agreeable to using strategic SANG capacity for sites that are not in accordance with the Development Plan."
- 5.83. In Appeal Decision APP/A1910/W/23/3333545 (Rectory Farm, Kings Langley, Hertfordshire, Dacorum, WD4 8HG) (CD11.01 at paragraph 32), the inspector said it would be "the epitome of unreasonableness" for that Council (Dacorum) to refuse to release SANG to the appellant if permission were granted on appeal. The Appellant takes a similar position.
- 5.84. It is also proposed by the Council that Rooks Nest SANG be extended, to accommodate additional development in the emerging Local Plan. This is detailed in the Council's SANG Topic Paper for the LPU (CD07.35 at paragraph 2.22) (quoting the HRA): *"WBC have committed to extend the 18.3ha site by 33ha of council-owned land, which will increase its overall area to 51.3ha. With the proposed extension in place, the catchment of Rooks Nest Wood SANG will increase from 4ha to 5ha."*
- 5.85. That extension would accommodate windfall development in addition to mitigating the impact of specific site allocations. It is understood that the Council has resolved to create that additional SANG but no planning permission has yet been granted. Nevertheless the Council relies upon that extended SANG as mitigation of the LPU and as such, must have reasonable certainty that the SANG is deliverable in order for the HRA of the emerging plan to be carried out satisfactorily. A number of the large SDL site allocations will provide their own SANG (including LVGV which is the subject of a pending application for SANG which is a detailed application). As such, it is reasonable to expect that this Appeal Site could utilise the remaining capacity within the existing Rooks Nest SANG for initial site completions, followed by SANG capacity in the extended Rooks Nest for the remainder.

5.86. The Council's SANG Topic Paper (CD0735) concludes that:

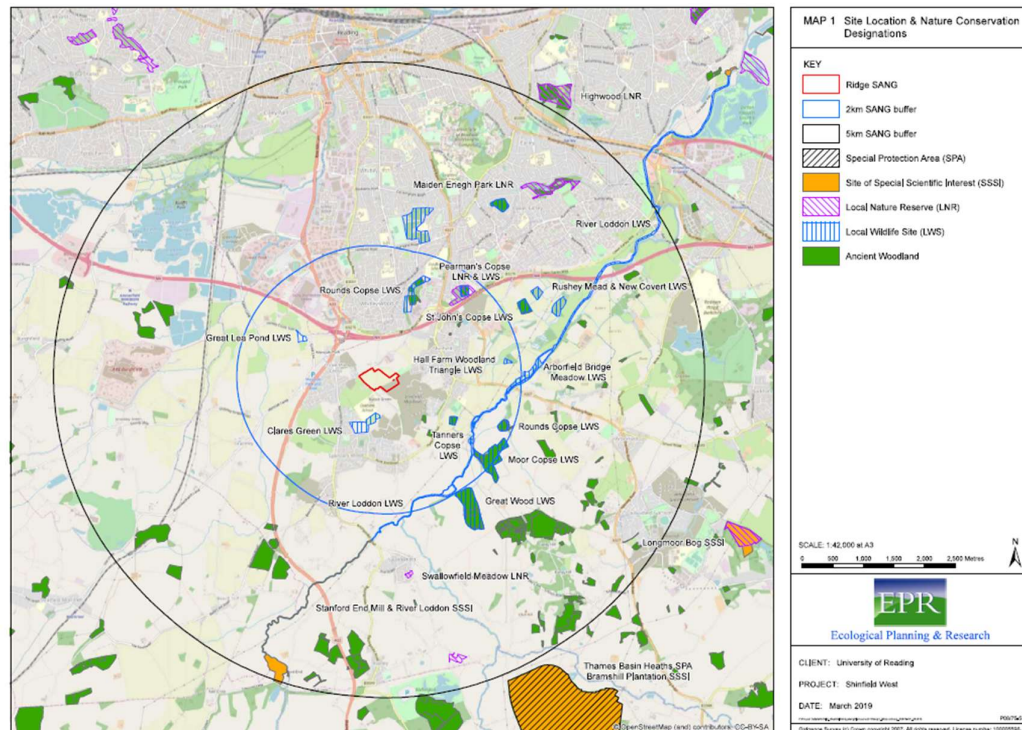
“Overall, given the available evidence base, it is considered that WBC have an adequate inventory of strategic SANG in place to mitigate the residential growth delivered by the WBLPU, potential windfall development, both in terms of residual capacity and geographic siting of the SANGs.”

5.87. In any event, additional private SANG is available at The Ridge which is a private SANG operated by the University of Reading (approved under LPA Ref: O/2013/0346 and also under LPA Ref: O/2010/1432. The Ridge Reserve extension was approved under LPA Ref: 171151). The Council's SANG Topic Paper produced for the LPU confirms “Given the scale of the SDLs, and the quantum of both new development and SANG provision, there remains some surplus SANG capacity at the SDLs.” (CD07.35 at para 2.17)

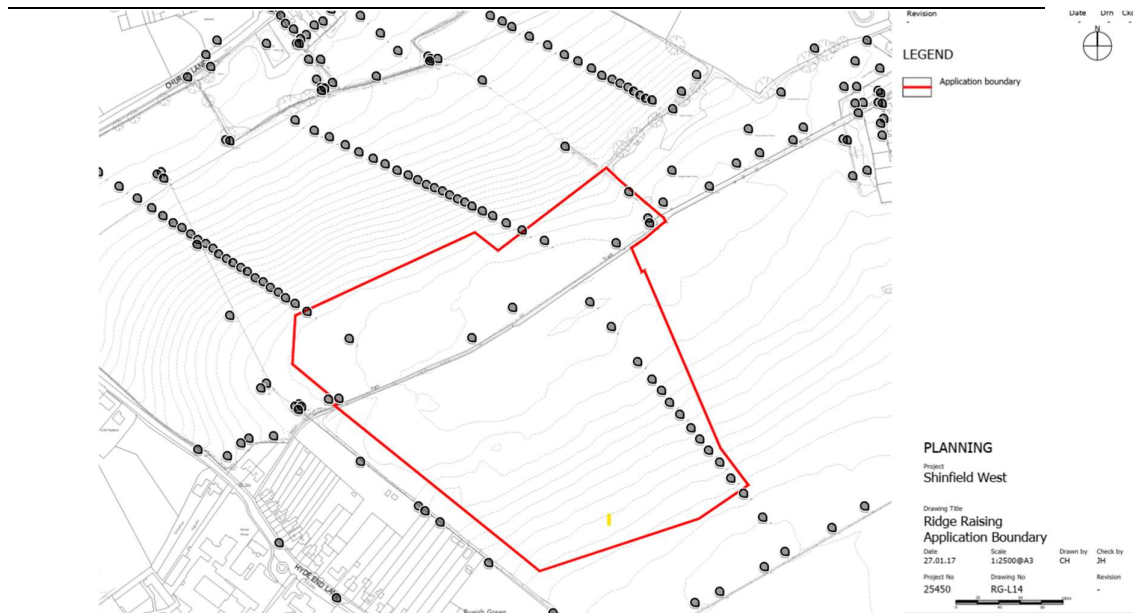
5.88. The Council's FOI Response (Annex 4 to this Proof) identifies the Ridge and separately the Ridge Reserve SANGs but in practice these operate as one single SANG. As such, their catchments should not be recorded as 400m and 2km respectively. Rather, the total SANG area at those two sites combined is 14.48ha. The 8.6ha Mays Farm is also adjacent to these Ridge SANGs. As such, the catchment of these three interconnected SANGs is 5km, much larger than the catchments indicated in the FOI responses. Accordingly, the Appeal Site does lie within the 5km catchment of this group of SANGs, and there is sufficient capacity to mitigate the Appeal Scheme. Furthermore, the operator of the SANG has confirmed their willingness to sell such SANG credits to the Appellant (Annex 5 to this Proof). The s106 agreement will secure payment of these funds.



Source: EPR 'The Ridge Suitable Alternative Natural Greenspace (SANG) Revised SANG Creation & Management Plan'



Source: EPR 'The Ridge Suitable Alternative Natural Greenspace (SANG) Revised SANG Creation & Management Plan'



Source: LPA Ref 171151 Site Location Plan (Barton Willmore)

- 5.89. Notably, the Council's planning witness was content that the site north of School Road Arborfield Cross was within the catchment of Ridge SANG (as per the officer's report for that scheme – CD10.01.01) and that site is further from Ridge SANG than this Appeal Site. The officer's report for the School Road scheme confirms her view at paragraph 184 and also records that Natural England were content with a site at School Road, Arborfield Cross utilising SANG capacity at the Ridge, as it is within a 5km catchment of the same:

"The proposal would result in a net increase of up to 70 dwellings within 5km of the TBH SPA and as such, there is likely to be a significant impact on the TBH SPA. The application is accompanied by a Habitat Regulations Assessment DFA25013 Rev V2 which sets out that an agreement has been reached with the University of Reading to secure the necessary capacity (1.34ha) at the Ridge SANG in Shinfield. Natural England has reviewed the proposals and raised no objection to the scheme, subject to SANG and SAMM requirements being secured in a S106 legal agreement."

- 5.90. The UoR has confirmed (see letter at Annex 5) that it will make its private SANG capacity at available for mitigation of effects of this Appeal Scheme.

- 5.91. Subject to securing the necessary mitigation, the Appeal Scheme is compliant with Policies NRM6 South East Plan, CS CP8 (Thames Basin Heaths SPA); and CS CP4 (Infrastructure Requirements). The s106 agreement will secure SANG via a combination of Rooks Nest payment and payment to the University of Reading.

Additional Matters: Loss of Agricultural Land (Reason for Refusal 5)

- 5.92. The Council's position is that the Appeal Scheme would result in the loss of Best and Most Versatile ("BMV") agricultural land, due to a small part of the Appeal Site being classified as Grade 3a Agricultural Land. As such, the Council considers that the proposal conflicts with Core Strategy Policy CP1 (Sustainable Development) and section 15 of the NPPF.
- 5.93. An Agricultural Land Classification report submitted during the course of the Application (CD01.29) concluded that only 0.7ha of the 6.4ha site (11% of the total area) is Grade 3a land, with the remainder falling within grade 3b/4/non-agricultural (3.6 of the report). As such only 11% of the Appeal Site comprises 'BMV' Agricultural Land. The higher quality land is the triangular portion of land to the west of the Site which is shown on the illustrative masterplan as retained for landscaping/ open space with no built form proposed. This small 0.7ha parcel would not be viable for economically productive agricultural use. Further we note this Site is not presently in active agricultural use for food production (nor has it been in recent history). The loss of BMV at this very limited scale is to be weighed in the planning balance and is to be afforded **very limited** weight.
- 5.94. The Council's position on loss of BMV Land can be seen in other recent decisions nearby, including two which were recommended for approval despite the loss of larger areas of BMV.
- 5.95. Application 250735 – Land at School Lane, Arborfield (CD10.0.01) was recommended for approval and the Planning Committee resolved to grant the scheme (subject to s106) on 9 July 2025. That proposal, for up to 70 dwellings, involved the loss of 1.1ha of BMV Land (as compared with 0.7ha in this case). Yet the Council took the view that such loss would only cause minor harm in

the overall planning balance:

“Officer comment: the proposal would result in loss of 1.1 hectare of agricultural land of 3a classification. Whilst this would result in a loss of Best and Most Versatile Land, it is considered that only a relatively small amount of land classified as BMVL would be lost. As such, the resultant harm would be minor, but is considered within the overall planning balance.” (Application 250735 Officer’s Report, page 9).

5.96. Similarly, the Council’s Planning Committee resolved, on 13 November 2024, to approve a scheme of up to 50 dwellings at Land off Langley Common Road, Arborfield (Application Reference 232490) (CD10.02.02). As noted at paragraphs 36-40 of the officer’s report for that scheme (CD10.02.01), the site comprised Grade 2 and 3a agricultural land and therefore involved the loss of BMV Agricultural Land. A review of the Agricultural Land Survey submitted with the application (CD10.02.03) shows that 25% of that site is Grade 3a BMV (equating to 0.6ha of land).

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

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

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

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

"Economic

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

- 5.99. And:

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

- 5.100. In the recent appeal decision APP/X0360/W/25/3364304 (Land between Lodge Road and Tape Lane, Hurst RG10 0EG) (decided 9 October 2025) (CD10.06) the inspector gave limited weight to the loss of approximately 5ha of BMV land, which equates to approximately half of that site. The land was not part of an active agricultural operation and "given development pressures in the borough, it is also inevitable that some agricultural land will need to be built upon, which is likely to give rise to the loss of at least some best and most

versatile agricultural land." It is understood that Mr Croucher, giving evidence for the Council at that inquiry, gave only modest weight to the loss of BMV in that case.

- 5.101. The Council proposes strategic scale development at Hall Farm/Loddon Valley to the north of the Site. The application recently submitted for that site is supported by an Agricultural Land Classification report (CD12.12), the final page of which shows that a) significant parts of that site are Grade 3a BMV land, and also that b) the Appeal Site is not an isolated pocket of good quality BMV land, rather there are extensive areas of good quality agricultural land in the immediate locality.
- 5.102. This Appeal proposal results in the loss of small 0.7ha parcel of Grade 3a land in conflict with Policy CP1 of the Development Plan. That land, however, has not been used for active agricultural food production at any point in recent history. It represents a very small proportion of the overall BMV resource in the Borough and only very limited weight can be afforded to its loss. Furthermore, the Appeal Scheme delivers more dwellings than either of the two examples above where the Council took a more positive stance. Overall, the economic factors of this scheme (with up to 111 dwellings) are, overall, positive. At most, **very limited negative weight** is attributed to the loss of BMV.

Additional Issue 1: Whether the proposal would prejudice the delivery of Loddon Valley Garden Village for reasons of highway capacity.

- 5.103. As set out in section 5.9 of the LPA's Statement of Case, it is proposed to deliver at least 2,700 of the 3,930 of the Local Plan Update's proposed new housing at a site known as the Loddon Valley Garden Village (LVGV) which is in close proximity to this Appeal Site. Two of the three planning applications necessary to deliver that Garden Village have been submitted (CD12), with one further application relating to 'Hatch Farm' as yet unsubmitted. The Council suggests at 5.9.6 of its Statement of Case that the third application will be submitted in the Spring of 2026. As noted above, first completions are not expected on the land which is subject to live applications until September 2028 at the soonest. It is the third application, relating to Hatch Farm, which is

expected by the Council to deliver completions within the 2027/2028 monitoring period. With no application having been submitted for Hatch Farm as of 08 February 2026, this timeframe is considered unrealistic.

5.104. In terms of the Council's 'Additional issue 1', the LPA details the Transport Assessment forming part of the evidence base for the Local Plan Update and identifies that it assesses delivery at a rate of 800 homes at Loddon Valley Garden Village by 2032. As detailed at paragraph 5.9.9 the LPA identifies that highway mitigation works are required in order to achieve the homes planned for that site. Furthermore, as noted at 5.9.10, the deliverability of the LVGV is reliant upon the delivery of these highway mitigation measures. The LPA therefore expressed concern that that 'up to 111' dwellings on this Appeal site, if allowed, could erode this '800 unit headroom' by which the need for – and cost associated with - the necessary highway mitigation is triggered.

5.105. The LVGV is a proposed allocation – still subject to detailed scrutiny in the Stage 2 Local Plan Update hearings. It is subject to a live application but the position of the Highway Authority has not been made public at this stage.

5.106. As set out in the Proof of Evidence of Matthew Stevens, the Appeal Site proposals will only have a negligible effect on the strategic traffic modelling undertaken in the context of the Local Plan Update ("LPU"); as part of the assessment of LVGV. In his professional opinion, setting a trigger point for infrastructure mitigation based on dwelling units is not a relevant unit of measurement. Rather, the trip generation arising from dwelling units and its distribution on the given highway network is, in his view, a more sensible benchmark to determine impacts. The Appeal Site trip generation, trip distribution and the interaction of development-related traffic with both the local and strategic road network have been comprehensively assessed. These matters were reviewed by the Council and found to be acceptable (CD 02.19). Any potential impact arising from the Appeal Site would represent a negligible increase in flows on the key links, typically well below 2.0% and often below 1.0%, identified within the Council's modelling. The Appeal Site would generate a negligible number of additional vehicle trips at key junctions identified from the Council's modelling. On that basis, Additional 1 is considered to have been satisfactorily addressed.

Additional Issue 2: Access and Visibility Splays

5.107. As detailed in the Proof of Mr Matthew Stevens, the agreed position on access design and visibility splays is detailed within the Highways SoCG (CD05.05). In essence, the tree in question was confirmed by Mr Wilkins, in his initial Arboriculture Impact assessment (CD01.14) as being removed and therefore the visibility splay requirements do not give rise to any additional impact in terms of loss of T14.

5.108. On this basis, I consider that Additional Issue 2 is resolved.

Additional Issue 3: Irreplaceable Habitats

5.109. This issue relates to the suitability of buffer zones around veteran trees. Notably, the masterplan and land use plans are illustrative only and are submitted in order to demonstrate that the proposed quantum of development can be accommodated on the Appeal Site, subject to detailed design at Reserved Matters stage. An updated Illustrative Master plan and Illustrative Land Use plan have been produced in the context of discussions regarding tree RPAs with the Council's officer, to make more clear that no development could occur within the RPAs of veteran trees and no private gardens would overlap with the same.

5.110. The Proof of Evidence of Mr Peter Wilkins concludes that The Appeal Scheme can be delivered without negatively impacting on the longevity and biodiversity value of existing veteran trees on the Site. Mr Wilkins confirms, in his evidence, that the Updated Indicative Land Use Plan (052403-DAN-MP04-ILUP) makes clear that up to 111 dwellings can be delivered on the Site without impact to the RPAs of veteran trees, with no private gardens or developable area encroaching into these. Mr Wilkins' evidence also identifies that the current waterlogging on the Site is sub-optimal for trees and the proposal has the potential to improve growing conditions for existing trees on the Site via management of surface water flows across the Site to reduce water logging.

5.111. Accordingly, there will be no loss or deterioration of irreplaceable habitat and

indeed there is potential for betterment and a positive impact on veteran trees. Accordingly, impacts on irreplaceable habitats does not constitute a 'strong reason for refusal' for the purposes of NPPF paragraph 11(d)(i) and footnote 7.

Additional Issue 4: Protected Species and BNG

- 5.112. The attached Statement by Mark Rose (Annex 6) addresses the issue of impacts on protected species (specifically bats) arising from the s278 package of works. He concluded that in his opinion direct impacts of the proposed footway improvements will result in no significant ecological effects, with the scheme designed to allow for retention of all existing mature trees along the highway boundary. The minor loss of roadside grassland verge will have no appreciable effect on the local habitat resource.
- 5.113. He further concludes that the proposed installation of new artificial lighting along Reading Road between the Appeal Site and Arborfield Cross is unlikely to significantly alter the local diversity, distribution or abundance of bat species. As such, he considers that this indirect impact is unlikely to constitute a significant negative effect on local bat populations.
- 5.114. A statement of common ground on BNG matters (CD05.08) confirms that the updated 2026 BNG Metric submitted by the Appellant (CD16.03.02) adequately reflects the baseline for BNG purposes. This BNG issue is therefore resolved.

6. Consultation Responses and Public Representations

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

- WBC Built Heritage Officer (CD02.23)
- WBC Drainage (CD02.11)
- WBC Highways (CD02.17-19)
- WBC Affordable Housing (CD02.15)
- Thames Valley Police (CD02.09)
- Berkshire Archaeology (CD02.02)
- Royal Berkshire Fire and Rescue (CD02.07)
- WBC Ecology and Nature Space (requested further information which was duly supplied). (CD02.24)

6.2. Those consultees who did object raised issues which form the basis of the reasons for refusal and are therefore addressed in this Statement. This includes comments from WBC Planning Policy (CD02.20), WBC Landscape and Trees (CD02.22), The Environment Agency (CD02.16), and the ICB (CD02.06).

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

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

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

7. Planning Obligations and Conditions

Planning Obligations

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

- SPA Mitigation and Avoidance (and Monitoring) relating to the Thames Basin Heaths Special Protection Area.
- Training, apprenticeships, and other vocational initiatives to develop local employability skills.
- Affordable Housing provision on the Appeal Site (40%).
- Financial contributions towards Parks and Gardens, Off Site Sport and Recreational facilities
- Off-site pedestrian improvement works to be secured via s278 agreement.
- Public Transport Contribution
- Travel Plan and Monitoring Fee
- Estate Roads created to adoptable standards
- Establishment of a Management Company
- BNG
- Healthcare Contribution.

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

Conditions

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

8. Planning Balance and Conclusions

General

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

“any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework

taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination⁶

The Reasons for Refusal and Impacts of the Proposal

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

i. Whether the proposed development is in a suitable location having regard to local and national policies in relation to the location of housing:

It is accepted that the proposal conflicts with the Development Plan's spatial strategy (Policies CP9, CP11, CC02 and AD1), but this conflict is afforded only **limited weight** as these policies are manifestly out of date. The proposal accords with national policy supporting delivery of development which addresses an acknowledged unmet housing need and boosting supply of housing in a location with suitable location (in sustainability terms) regardless of the breach of out-of-date settlement boundaries.

The Appeal Scheme accords with Policies CP1, CP2, CP3, CP6, CC01 and NPPF paragraphs 7 and 8 (achieving sustainable development) on sustainable development and indeed NPPF policies regarding sustainable locations, making efficient use of land, securing well designed places and providing

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

affordable homes (as set out in NPPF footnote 9: 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.). I afford **significant weight** to the delivery of sustainable development; and **substantial weight** to the delivery of housing to address the shortfall; the Appeal Scheme provides 40% affordable housing (consistent with paragraph 66), would not result in isolated homes in the countryside (consistent with paragraph 84), is in a sustainable location and prioritises sustainable modes of transport with a vision led approach (consistent with paragraphs 110 and 115), makes efficient use of underutilised land (paragraph 129), delivers high quality design (paragraph 135) and reflects local guidance (paragraph 139).

ii. The effect of the proposed development on the character and appearance of the surrounding area.

The Site is not a valued landscape and there are limited and localised views. This localised change in landscape character is in conflict with Policies CC03, TB21 and IRS2 (which seek to avoid loss of any green infrastructure and preserve the rural setting of settlements), which attracts **moderate negative weight**. However, the proposal delivers additional green infrastructure and preserves /enhances the Green Route along Reading Road with supplemental planting.

iii. Whether the quantum and scale of development is acceptable.

The proposed density makes efficient use of the Site. Whilst the proposed density differs from that the very low density housing the north and west, it is considered that the proposal will still relate to the surrounding built form. The Council has accepted that development of the School Lane site at Arborfield Cross could rightly come forward at higher density than the surrounding area, in order to make efficient use of the site. I conclude a similar conclusion is warranted here. The requirements of CP1, CP3, Policy CC03, Policy TB21 and AD3 NHP, as referenced in the decision notice and relation to questions of scale/massing and the quantum of development, are met. In conclusion, the scale and quantum of development is considered appropriate on this Site.

Based upon the proposed maximum quantum of development, there are opportunities to bring forward a high quality design and layout at Reserved Matters stage consistent with the NPPF's stated 'fundamental' aim of creating "high quality, beautiful and sustainable buildings and places." (NPPF paragraph 131). In accordance with NPPF paragraph 135, the proposed quantum is such that the Site can accommodate a design which will function well and add to the quality of the area, and which will be visually attractive with good architecture, layout and effective landscaping. The scale is sympathetic to local character and the landscape setting/ environment and the arrangement of streets can establish a strong sense of place. The layout optimises the potential of the site whilst supporting the creation of a high quality development which promotes health and wellbeing. As such, I afford **significant weight** to the ability to bring forward high quality design.

iv. Whether the proposal would be sustainable development, having regard to its location and the opportunities for sustainable travel.

The Site is a sustainable location for development and further measures are proposed to further boost its sustainability credentials. The evidence is that the Site is highly sustainable. I consider that the Appeal Scheme meets the requirements of Policies CP1, CP2, CP3, CP6, CC01. It accords with NPPF policies 110, 115 and 117 -118.

v. The effect of the proposed development on the nearby watercourse with particular regard to flooding and water quality. In relation to this matter the parties should base their evidence on the Environment Agency's most recent advice and flood maps.

The proposal is safe for its lifetime, and there was no objection from the Council's drainage officer subject to detailed design of the drainage strategy at Reserved Matters stage. The need for a ST is not triggered. Concerns around the capacity of local sewage treatment infrastructure have been addressed (confirming sufficient capacity) and the recommended pre-occupation

condition is unjustified. The Site access will cross an existing culvert such that no additional culvert is required in the Main River.

No conflict arises in respect of Development Plan Policies CP1, CP3, CC10, AD4 nor section 14 of the NPPF. This issue is satisfactorily addressed.

vi. Whether any potential adverse effects on the integrity of the Thames Basin Heaths SPA would be adequately mitigated.

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

vii. Whether the proposal would prejudice the delivery of Loddon Valley Garden Village for reasons of highway capacity – as set out in the evidence of Mr Matthew Stevens, the Appeal proposal will only have a negligible effect on the strategic traffic modelling undertaken in the context of the Local Plan Update (“LPU”); as part of the assessment of LVGV. As such the Appeal Scheme would not prejudice the delivery of LVGV nor would it give rise to any unacceptable impacts on highway safety or severe residual cumulative effects on the network. Accordingly I conclude that the Appeal Scheme will not prejudice the delivery of the LVGV SDL site. This issue is resolved.

viii. Loss of Agricultural Land – The proposal does involve the use of a small area of BMV, in conflict with Policy CP1 of the Development Plan and NPPF. However, due to the very small quantum of land involved, its lack of agricultural use and low proportion of wider BMV resources, this conflict is afforded **very limited** weight.

ix. Protected Species - The evidence of Mr Mark Rose concluded that direct impacts of the s278 proposed footway improvements will result in no significant ecological effects, with the scheme designed to allow for retention of all existing mature trees along the highway boundary. The minor loss of roadside

grassland verge will have no appreciable effect on the local habitat resource. The proposed installation of new artificial lighting along Reading Road between the Appeal Site and Arborfield Cross is unlikely to significantly alter the local diversity, distribution or abundance of bat species. As such, indirect impacts are unlikely to constitute a significant negative effect on local bat populations

x. Irreplaceable Habitats - The Appeal Scheme can be delivered without negatively impacting on the longevity and biodiversity value of existing veteran trees on the Site. Accordingly there will be no loss or deterioration of irreplaceable habitat and indeed there is potential for betterment and a positive impact on veteran trees. Accordingly, impacts on irreplaceable habitats does not constitute a 'strong reason for refusal' for the purposes of NPPF paragraph 11(d)(i) and footnote 7.

Scheme Benefits

- 8.7. This section considers the Appeal Scheme in the context of the three sustainability tests set out at paragraph 8 of the NPPF and paragraph 11(d).
- 8.8. The Appeal Scheme will provide a range of housing types and sizes, including **up to 111 dwellings** including 44 **affordable dwellings** (40%). to address identified housing needs in a sustainable location. This is a **substantial** positive benefit. As a greenfield site, delivery can come forward quickly to assist with the Council's housing shortfall; this is a further **substantial benefit**.
- 8.9. The provision of housing supports **economic growth** and the associated provision of infrastructure. Jobs will be created during the construction phase and future households will contribute to local expenditure. The principal economic benefits arising from the scheme are summarised in Annex 7.
- 8.10. By providing land of the right type, in the right place, and at the right time to support economic growth, the development of up to 111 dwellings on the Appeal Site fully accords with the objectives at paragraph 8 of the NPPF and assists in the aims of the NPPF in helping to build a strong and competitive economy.

- 8.11. The economic benefits (Annex 7) are to be accorded **substantial weight** in the planning balance.
- 8.12. By delivering homes in a sustainable location, and providing additional sustainability /active travel improvements the Appeal Scheme delivers homes within easy walking and cycling distance of local services and facilities and via public transportation to higher order services. Homes in sustainable locations are of benefit these occupants. This is a **significant** benefit.
- 8.13. By developing a site which is not identified as a 'Valued Landscape' the Appeal Scheme reduces pressure on other, more valued landscapes within the borough. New public open space will be delivered on the Site and new pedestrian connections. These benefits are **significant**.
- 8.14. The Appeal Scheme will secure a high quality form of development consistent with the development management policies of the NPPF and the approach to high quality design set out in the NPPF. The proposals would deliver modern, energy efficient **sustainable homes** allowing the fulfilment of this important objective whilst at the same time moving to a low carbon economy and securing an environmentally sustainable form of new residential development, with the Scheme securing an **overall 10+% biodiversity net gain** (to be refined at reserved matters stage). This is a **significant** benefit.
- 8.15. Overall, the benefits of the Appeal Scheme should be accorded **substantial** weight. The table below summarises the above findings.

Scheme benefit	Weighting
Quick delivery to contribute to the housing supply shortfall	Substantial
Delivery of up to 111 homes	Substantial
Delivery of up to 44 affordable homes	Substantial
Economic benefits	Substantial
Delivery of sustainable development	Significant

Avoiding pressure on other valued landscapes	Significant
High quality development and environmental improvements	Significant

Overall Planning Balance

- 8.16. There is no “strong reason” for refusing the Appeal Scheme under paragraph 11(d)(i) to the NPPF. No footnote 7 matters (including the issue of veteran trees/ irreplaceable habitat) give rise to any ‘strong reason for refusal’. As such, the titled balance is not disengaged.
- 8.17. It is therefore necessary to turn to the tilted balance under paragraph 11(d)(ii).
- 8.18. The identified landscape and visual harms are only of **moderate** weight and the loss of 0.7ha of BMV attracts only **very limited weight**. The conflict with the spatial strategy attracts **limited** weight. By contrast the package of benefits attract **substantial** weight.
- 8.19. Applying this test, the identified adverse impacts of granting planning permission would not significantly and demonstrably outweigh the benefits when assessed against the policies in the NPPF taken as a whole (quite the opposite). As directed by paragraph 11(d)(ii), particular regard is to be given to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes). The Appeal Scheme will deliver housing to address an acknowledged shortfall, including 40% affordable housing (consistent with NPPF paragraph 66), would not result in isolated homes in the countryside (consistent with paragraph 84), is in a sustainable location and prioritises sustainable modes of transport with a vision led approach (consistent with paragraphs 110 and 115), makes efficient use of underutilised land (paragraph 129), delivers high quality design (paragraph 135) and reflects local design guidance (paragraph 139).

8.20. As such, the adverse effects do not significantly and demonstrably outweigh the benefits when assessed against the NPPF as a whole, having particular regard to those policies. The Appeal Scheme benefits from the presumption in favour of sustainable development and the grant of permission is justified.