

DELEGATED OFFICER REPORT



**WOKINGHAM
BOROUGH COUNCIL**

Application Number:	242421
Site Address:	Land North of School Road, Arborfield Cross
Expiry Date:	24 December 2024
Site Visit Date:	9 September 2024
Proposal: Outline application for the proposed redevelopment of the site and erection of up to 95 no. dwellings with associated access, infrastructure, open space, landscaping and associated works. (All matters reserved except for means of access).	

PLANNING CONSTRAINTS/STATUS

Ancient Woodland (110m south-west from Hazeltons Copse and 560m south-west from the Coombes)
Bat Roost Habitat Suitability
Contaminated Land Consultation Zone (north-east section of the site)
Countryside
Flood Zone 1
Great Crested Newt Consultation Zone (Amber and Green)
Green Routes and Riverside Paths (School Road is a Green Route)
Greenway Route (Route B – proposed, not yet consented)
Landscape Character Assessment Area (Arborfield Cross and Barkham Settled and Farmed Clay)
Listed Building (Grade II Listed Building Langleypond Farmhouse is located 30m to the east, a cluster of Grade II Listed Buildings at Newland Farm located 170m to the west)
Conservation Area (Arborfield Cross Conservation Area is located 160m to the west)
Local Plan Update Submitted Sites (forms part of 5AR007 and 5AR009)
Local Wildlife Site (110m south-west from Hazeltons Copse and 560m south-west from the Coombes)
Nuclear Consultation Zone (AWE Burghfield – 12km zone)
Ordinary Watercourse (tertiary rivers run along western and eastern boundaries of the application site)
PRoW Within WB Consultation Zone (ARBO9 and ARBO10 byways open to all traffic)
SSSI Impact Risk Zones (1.7km from Longmoor Bog and 4km from Bramshill)
Thames Basin Heaths SPA Mitigation Zones (5km zone)
Tree Preservation Order (TPO-1926-2023 includes trees T5 and T6 within an area of farmstead to the south-east corner of the site)
Valued Landscape (Bearwood and Barkham Valued Landscape)

PLANNING POLICY

National Policy	National Planning Policy Framework 2024 (NPPF) National Planning Policy Guidance (NPPG)
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Core Strategy (CS)	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
MDD Local Plan (MDD)	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
Other	Borough Design Guide Supplementary Planning Document CIL Guidance Affordable Housing Supplementary Planning Document Sustainable Design and Construction Supplementary Planning Document Arborfield Garrison SDL SPD Arborfield and Newland Village Design Statement Green Infrastructure Framework Arborfield and Barkham Neighbourhood Plan Climate Change Interim Policy Position Statement

PLANNING HISTORY		
Application No.	Description	Decision & Date
180567	Application for a Screening Opinion for an Environmental Impact Assessment for the development of 120 dwellings, which would be up to 2.5 storeys in height, with access from School lane, a new car park to serve the Coombes CE Primary School and all necessary infrastructure	EIA not required 15/03/2018
180596	Outline Planning Application for the proposed erection of up to 120 dwellings and all associated	Refused 22/06/2018

	parking, landscaping, internal road network and public open space. Access to be considered.	
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CONSULTATION RESPONSES

Internal

WBC Built Heritage Officer – objection
 WBC CIL – no objection
 WBC Cleaner and Greener – no comments received
 WBC Community Safety – no comments received
 WBC Drainage – no objection subject to conditions
 WBC Ecology – objection
 WBC Ecology Newts – no objection
 WBC Economic Prosperity & Place (Affordable Housing) – no objection subject to planning obligations
 WBC Economic Prosperity & Place (Employment Skills) – no objection subject to planning obligations
 WBC Education (School Place Planning) – no objection subject to planning obligations
 WBC Environmental Health – no objection subject to conditions
 WBC Green Infrastructure – objection
 WBC Growth & Delivery (Planning Policy) – objection
 WBC Health and Wellbeing – no comments received
 WBC Highways – objection
 WBC Landscape and Trees – objection
 WBC Property Services – no comments received
 WBC Public Rights Of Way – no objection subject to planning obligations
 WBC Sports Development (Places and Neighbourhoods) – no comments received
 WBC Sustainability – objection

External

Active Travel England – standing advice received
 Berks, Bucks & Oxon Wildlife Trust – no comments received
 Berkshire Archaeology – no objection subject to conditions
 Binfield Badger Group – no comments received
 Crime Prevention Design Advisor – no objections
 Historic England – standing advice received
 Natural England – no objection subject to planning obligations
 NHS Wokingham CCG – no objection subject to planning obligations
 Royal Berkshire Fire & Rescue – no objection
 Southern Gas Networks – no objection
 SSE Power Distribution – no objection
 Thames Water Utilities Ltd – no objection subject to conditions
 The Environment Agency – no comments received

REPRESENTATIONS

Arborfield & Newland Parish Council	Objection on the following grounds: Out of keeping with the locality and character of the area
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		• Failure to provide additional infrastructure or benefit the community • Increase in traffic volumes and pressure on services • Contrary to the Arborfield and Barkham Neighbourhood Plan, which is within the suggested review period; as such, it should hold weight • Other applications on this and nearby sites have been refused • Coalescence of settlements • Pre-empting Local Plan Update • Failure to preserve identity and rural nature of settlement • Loss of greenfields • Outside of settlement boundary • Failure to protect and enhance natural environment and green spaces • Encroachment on the ancient woodland • Unsustainable location would lead to over-reliance on car use • Out of keeping with the historic character of the area • Contradicts the rationale for closing off School Road • Inadequate improvements to public transport • Loss of Best and Most Versatile Agricultural Land • Quantum is disproportionate to the size of the Arborfield Cross Village (30% increase) • Lack of improvements to the infrastructure network • Impact of the additional traffic on safety of school traffic
Barkham Council	Parish	Objection on the following grounds: • Previous reasons for refusal (application 180596) are still valid • Harm to the countryside • Outside the settlement area • Encroachment on the green wedge between Barkham Hill and Arborfield Cross, leading to urbanisation of countryside • Unsustainable site and resulting over-reliance on private car travel • Poor access to facilities • Pre-empting Local Plan Update • Failure to provide a satisfactory relationship within the existing settlement pattern • Other applications on this and nearby sites have been refused • Impact on the Arborfield Cross Conservation Area • Impact on the Coombes Woodlands (Local Wildlife Site, area of geological interest and ancient woodlands)

Councillor Joseph Barley (Ward Member)	Listing request received in the event of approval for the following reasons: • Does not address previous reasons for refusal • Other applications on this and nearby sites have been refused • Outside of settlement boundaries, within countryside • Harm to countryside due to urban creep • Out of keeping with rural character of Arborfield Cross • Encroachment on the strategic gap between Arborfield Cross, Barkham and Langley Common • Previous application report stated that this site could never accommodate development • Not allocated in Local Plan Update • Contrary to Arborfield and Barkham Neighbourhood Plan • No evidence to suggest that School Road should be re-opened – the proposal would result in unacceptable increase in traffic • Impact on highways safety • Failure to promote active travel and public transport • Unsuitable location to promote alternative forms of transport due to distance and suitability of highway network for walking and cycling • Loss of agricultural land • Impact on the Coombes Woodlands (Local Wildlife Site, area of geological interest and ancient woodlands) • Impact on the setting of a Grade II listed building (Langleypond Farmhouse) • Contrary to Local Plan Update policies
Councillor Adrian Betteridge (Ward Member)	Listing request received in the event of approval for the following reasons: • Disproportionate increase in the number of dwellings when compared with the number of dwellings within Arborfield Cross • Outside of the settlement boundary • Reduction of settlement gap between Arborfield Cross and neighbouring settlements • Contrary to the Local Plan Update • Lack of qualitative assessment of suitability of cycling routes and lack of proposals to improve it • Lack of proposals to improve frequency of bus service • Over-reliance on private car travel • Distance to bus stops • Increase in traffic volumes • Previous reasons for refusal remain valid
Neighbours	21 letters of objection received (excluding 6 duplicates) raising the following issues:

	• Highway safety concerns due to the increase in traffic volumes • Reduction of benefits derived from School Road closure • Outside of settlement boundary • There will be sufficient homes delivered at Loddon Valley Garden Village if Local Plan Update is approved • Contrary to Local Plan Update allocations • The site is a greenfield and the proposal should not refer to “redevelopment” as it has only been used for agriculture • Enough housing being delivered as part of the Strategic Development Location of Arborfield • It will transform a rural area into an urban sprawl • Loss of green space • Additional pressure on local services • Lack of medical facility or dentist • Oversubscribed schools • Incompatible with the development pattern • Visual and landscape impact on the Coombes • Impact on the public rights of way due to increase in population • Insufficient transport infrastructure • Not in keeping with the rural character of the area and the character of the village • Previous planning history on this and neighbouring sites demonstrates the location is unsuitable • Noise, dirt and dust pollution impact on residents and wildlife • Impact on Arborfield Cross Conservation Area • Thames Water treatment works cannot cope regularly and discharges sewage into the stream • Impact on the environmental quality and recreational character of the area • Impact of construction traffic during school peak times • Request for additional parking for school, 20mph speed limit and improved lighting and signage • Request for appropriate boundary fencing to safeguard pupils at school • Impact on pedestrian and cyclist safety • Impact on biodiversity • Erosion of green buffer between villages • Garden sizes not in keeping with character of the village • Facilities at Arborfield Green Village are not yet constructed
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APPRAISAL

Site Description:

1. The application site is set to the north-east of the village of Arborfield Cross and to the north-west of the village of Langley Common, within the open countryside, and is surrounded to the large extent by arable farmland to the north-east, north and south-east. To the south-west the site abuts the Coombes Church of England Primary School which forms the boundary of the Limited Development Location of Arborfield Cross. The application site proposes to take access off School Road to the north through a newly constructed access. To the east and west of the application site are located two Public Rights of Way (Byways Open to All Traffic): Cole Lane and Wood Lane. Both Lanes form part of a network of footways providing connectivity to the Coombes woodland. There are two ordinary watercourses running parallel to both Cole Lane and Wood Lane which connect to the main river to the north of the application site; both are connected by a ditch running along the northern boundary of the site. To the east the application site adjoins agricultural structures associated with farmland use. Beyond these, further to the east, is located Grade II Listed Building Langleypond Farmhouse. To the east of Wood Lane lies a cluster of buildings in commercial use. The application site is currently in use as arable field and is surrounded by belts of trees and hedgerows, which also dissect the site into eastern and western parcels. The site comprises undulated ground with levels dropping from the south-west corner to the north-east

Principle of Development:

2. The starting point for decision making is the development plan. Section 70(2) of the TCPA 1990 & 38(6) of the PCPA 2004 states that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. The plan-led approach established in law is reinforced through the NPPF including paragraph 48:

“Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.”

3. Paragraph 17 and 20 of the NPPF state the development plan must include strategic policies to address each local planning authority's priorities and an overall strategy for the pattern, scale and quality of development.
4. The Development Plan includes the Core Strategy (adopted in January 2010), the Managing Development Delivery Local Plan (adopted in February 2014) (MDD Local Plan) and the Arborfield and Barkham Neighbourhood Plan (2020). The Core Strategy and MDD Local Plan sets out the vision for

the borough and the policies to achieve those objectives. The core spatial strategy established by the Core Strategy was informed by engagement with the community.

5. The NPPF has an underlying presumption in favour of sustainable development which is carried through to the Development Plan. Policy CC01 of the MDD Local Plan states that planning applications that accord with the policies in the Development Plan for Wokingham Borough will be approved without delay, unless material considerations indicate otherwise.

Core Strategy and MDD Local Plan

6. A priority of the Development Plan is to steer new housing to the most sustainable locations within settlement boundaries and limit development within the countryside. This is, among other things, in order to promote sustainability, maintain the quality of the environment, protect the separate identity of settlements and provide certainty regarding how the borough will be developed. It is also well-explained in the Borough Design Guide at pages 6 -7.
7. The spatial vision explains that in order to deliver the necessary development within the Borough, the Council has identified a number of high-quality Strategic Development Locations (SDLs) where the majority of the minimum 13,230 new houses to be delivered in the Core Strategy local plan period will be located. This approach seeks to locate schemes where they can provide easy access to existing facilities and services or where infrastructure improvements can be delivered. In addition, the spatial vision seeks to concentrate development in those towns and villages that either have a significant range of infrastructure including facilities and services now - or will have them as a result of the development proposed through the CS. Development is stated to be less likely in locations where these facilities and services will not be available.
8. Policy CP9 of the Core Strategy *Scale and Location of Development Proposals* and CC02 of the MDD Local Plan *Development Limits* state that proposals will be permitted within development limits where the scale of the application reflects the facilities and services within the settlement. The settlements are split into three categories depending on the sustainability of those locations; Major, Modest and Limited development locations. Policy broadly steers Major developments to sustainable major settlements with the best services, facilities and infrastructure. The definition of development limits recognises the consistent approach in planning to identify appropriate and sustainable areas for development.
9. The site is adjacent to the settlement edge of Arborfield Cross (formed by the Coombes Primary School) and lies wholly within countryside. Arborfield

Cross is defined in Policy CP9 as a Limited Development Location. Para 2.87 of the Core Strategy states:

*“These settlements have a limited range of facilities, and do not have access to good quality public transport services [...] due to the limited range of facilities, it is not considered that significant development is appropriate **in these locations**, although smaller proposals which help support the communities and provide for an identifiable local need may be acceptable.”*

10. Policy CP17 *Housing Delivery* then states that development **within such locations** should not generally exceed 25 dwellings, within an allowance of 100 dwellings over all sites within all limited development locations taken together during the plan period.
11. The proposed development of up to 95 dwellings, even if located within the settlement boundary of limited development location of Arborfield Cross, would be appreciably in excess of the scale of development identified as being suitable within the village. Notwithstanding, as the site sits away from the village, outside the limited development location, Policy CP9 would not provide support for the proposal.
12. Given that the site lies within the countryside, an assessment against policy CP11 of the Core Strategy *Proposals Outside Development Limits* is required. This refers to development within the countryside and states *“in order to protect the separate identity of settlements and maintain the quality of the environment, proposals outside of development limits will not normally be permitted”*, other than the exceptions listed below:
 - a. *It contributes to diverse and sustainable rural enterprises within the borough, or in the case of other countryside based enterprises and activities, it contributes and/or promotes recreation in, and enjoyment of, the countryside; and*
 - b. *It does not lead to excessive encroachment or expansion of development away from the original buildings; and*
 - c. *It is contained within suitably located buildings which are appropriate for conversion, or in the case of replacement buildings would bring about environmental improvement.*
13. The proposed development would not fall within any of the exceptions set out in Policy CP11. As none of the exceptions given in Core Strategy Policy CP11 apply to this proposal, they would not form a basis to support this scheme.
14. Therefore, the location of this development is not in accordance with the Development Plan, taken as a whole. This is because by seeking to develop this countryside location, outside defined development limits, it would conflict with the spatial vision for the Borough, set out at Section 3 of the Core

Strategy, and would conflict with a number of adopted policies such as CS Policies CP9, CP11 and CP17, as well as MDD Local Plan Policy CC02.

Settlement Separation

15. The application site is an undeveloped open space between the defined settlements of Arborfield Cross, Barkham and Arborfield Garrison. As set out in the previous section, CP11 of the Core Strategy states that *“in order to protect the separate identity of settlements and maintain the quality of the environment, proposals outside of development limits will not normally be permitted”*. The development of this part of open countryside would diminish the physical separation between the settlements and incrementally erode and urbanise the gap between them, contrary to the spatial objectives of CS Policy CP11 and development plan as a whole. The importance of the separation between Arborfield Cross, Arborfield Garrison and Barkham is specifically emphasised by Core Strategy policy CP18 *Arborfield Garrison SDL* which states that the development of Arborfield Garrison should include measures to maintain separation of Arborfield Garrison from Arborfield Cross and Barkham Hill. Figure 2.2 of the Arborfield Garrison SDL SPD (Figure 1 below) identifies the areas where the separation of settlements is required to be maintained:



Figure 1: Arborfield Garrison SDL SPD constraints plan

16. Neighbourhood Plan Policy IRS1 states in order to protect the separation of settlements, development proposals outside of development limits should not lead to the physical, visual or perceived coalescence of existing settlements.
17. The development would encroach into open land to the north of School Road, between the settlements of Arborfield Garrison and Arborfield Cross and between the settlements of Arborfield Cross and Barkham. To this extent the proposal would erode some of the open land between these settlements, contrary to the aims of CS Policy CP11. The proposal would also encroach into open land between Arborfield Cross and Barkham Hill. Whilst adjoining the settlement boundary of Arborfield Cross, this boundary is formed by the

Coombes Primary School and its playing fields rather than residential development. The application site is within the appreciable rural setting of open, undeveloped fields surrounding Arborfield Cross. Whilst adjoining the settlement boundary, the proposal would be a self-enclosed housing development, detached from the village of Arborfield Cross by virtue of its location beyond the non-residential boundary formed by the school and its playing fields, the lack of physical connection to the existing settlement and the requirement for a “dog leg” access arrangement that does not allow it to stitch sensitively to the existing development.

18. The proposal (at up to 29.05 dph) would have poor relationship with the low-density historic, nucleated village of Arborfield Cross (at approx.17.5 dph) and the low-density ribbon development of Langley Common (to the east) that aligns with the road frontage (the impact on the character of the area and countryside is discussed further below in this report). The development would result in a pocket of suburban development in the countryside and would lead to physical and visual expansion of built form of Arborfield Cross and to joining of it with the linear development of Langley Common, thereby resulting in continuous line of built form and appreciable urban sprawl beyond the settlement limits. This, in turn, would lead to the physical and visual coalescence of existing settlements of Arborfield Cross with Langley Common, Barkham and Barkham Hill, contrary to Policy IRS1 of the ABNP which identifies each one of these as distinct settlements.
19. In summary, the principle of development is unacceptable due to the proposal's location outside of settlement limits, within countryside. The proposal would result in an urbanising encroachment into the countryside, which would erode both the separate identity of settlements and lead to visual and physical expansion of built form away from settlement limits. The impacts arising as a result are also further considered in the Character of the Area section below.

Emerging Local Plan Update

20. The Local Plan Update (LPU), the plan which will supersede the Core Strategy and MDD Local Plan, was published in October 2024 (Regulation 19 Proposed Submission Plan). The LPU sets out the development strategy and proposed site allocations to meet housing needs to 2040. The deadline for submitting representations on the published Proposed Submission Plan ended on 13 November 2024. The Proposed Submission Plan is intended to be submitted for examination in public in early 2025.
21. The site has been promoted for residential development (reference 5AR007). The site was assessed as part of the Housing and Economic Land Availability (HELAA) together with two other sites (5AR004 and 5AR021). In summary the HELAA stated that the context of the sites was unsuitable, being inappropriate in terms of established settlement form, landscape character

and accessibility. The extent of this group is highlighted in purple below with the application site outlined in red.

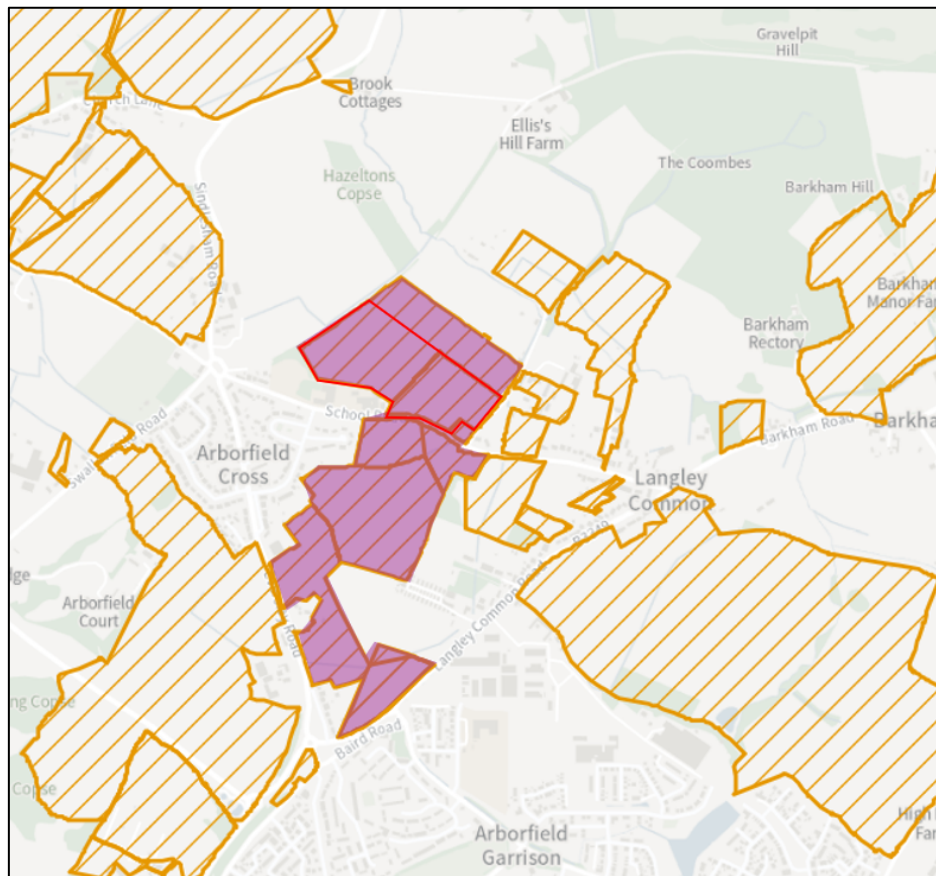


Figure 2: Group of sites assessed under HELAA

22. As mentioned above, in combination with other sites, the application site was considered unsuitable for residential development. However, it is recognised that the HELAA exercise was carried out at high level and is not comparable to assessment of a planning application. Moreover, the LPU is yet to be submitted for examination by Secretary of State and as such, it is considered to have limited weight in determination of planning applications (both in terms of site allocation and draft policies).

National Planning Policy Framework

23. The NPPF is a material consideration in the decision-making process. The NPPF outlines the Government's planning policy on a national level and highlights sustainable development as the centre of the decision-making process incorporating economic, social and environmental objectives. These three objectives seek to balance growth and local community needs against the protection of the natural, built and historic environment. It does not however change the status of the development plan as the starting point in the decision-making.

Housing Land Supply

24. The NPPF (Dec 2024) at paragraph 78 requires LPAs to identify a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than 5 years old. The latest published Five-Year Housing Land Supply Statement (at 31st March 2023) shows the Council is currently only able to demonstrate 3.2 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.
25. Paragraph 11 of the NPPF states that plans and decisions should apply a presumption in favour of sustainable development. For decision-taking this means that where policies which are most important for determining the application are out-of-date, permission should be granted unless:
- the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; 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
26. Firstly, in considering i), it must be recognised that the proposed site is located within a 5km zone of Thames Basin Heath Special Protection Area any protected areas or assets of particular importance (as outlined above and within footnote 7 and paragraph 195 of the NPPF). The implications for the proposal of this are discussed at paragraphs 170 to **Error! Reference source not found.** of this report. In considering ii), officers must assess as part of any forthcoming application whether there are any adverse impacts generated by the development that 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. This is referred to as the 'tilted balance,' as harm and benefits are not weighed equally, but tilted according to paragraph 11(d)(ii).
27. In acknowledging the requirements of paragraph 11(d)(ii) and the titled balance being engaged, it is necessary to consider whether there are any circumstances which affect the weight that can be given to the supply of additional housing.

28. An important underlying reason in the context of Wokingham Borough is the historic oversupply of housing against both the requirement set in the Core Strategy local plan and the scale of local housing need as calculated by the previous standard method which remains a key contributing factor to the current lack of the required deliverable housing land supply and this must be considered in the planning balance section at the end of the report.
29. Having established the tilted balance is engaged, Paragraph 11d(ii) requires the proposal to be considered against the policies of the NPPF taken as a whole.

Agricultural Land Classification:

30. CS Policy CP1 states that planning permission will be granted for development proposals that avoid areas of best and most versatile agricultural land (“BMVL”). Paragraph 187 of the NPPF states that planning decisions should contribute to and enhance the natural and local environment by

“...recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land”.

31. Natural England Agricultural Land Classification (ALC) indicates that the site (8.25 ha in size) to be Grade 3 and 4 agricultural land quality (Figure 3 below).

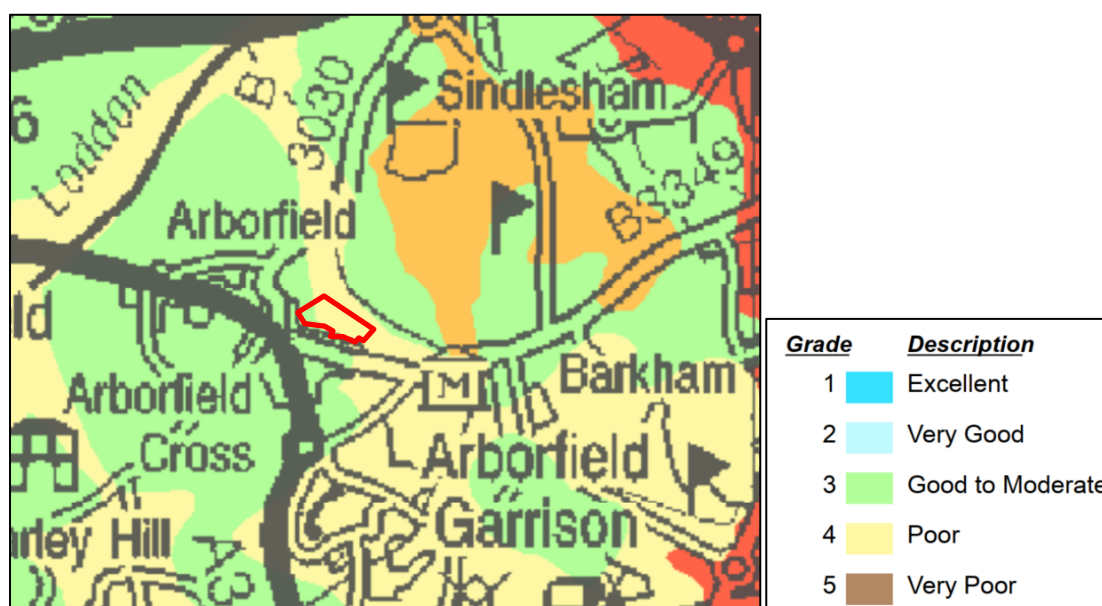


Figure 3: Extract from Agricultural Land Classification map London and the South East (ALC007)

32. The site is currently in agricultural use. Paragraph (y) in the Table of Schedule 4 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended) (“DMPO”) requires planning authorities to consult Natural England on applications that would (i) result in

the loss of more than 20 ha of BMVAL (ii) result in the loss of less than 20 hectares of BMVAL which is currently in agricultural use provided that the development is likely to lead to a further loss of agricultural land amounting cumulatively to 20 ha or more. BMVAL is graded as land falling within categories 1, 2 or 3a of the Agricultural Land. Natural England have been consulted on this application but provided no comments on the loss of BMVAL. Supplementary comments were not sought as it is not considered that the development would meet the requirements of either (y)(i) or (y)(ii) of Schedule 4 outlined above due to the site size falling below the threshold of 20 ha in (i) and the proposal not being considered likely to lead to a further loss of agricultural land that would meet the 20 ha threshold in (ii).

33. Paragraph 6 of National England's guidance Guide to Assessing Development Proposals on Agricultural Land ("GADPAL") highlights that Local Planning Authorities should use ALC survey data to assess the loss of land or quality of land from a proposed development. Where no suitable data exists, the GADPAL advises that a new field survey to support planning application may be required.
34. The aerial photographs indicate that the site has been in agricultural use for at least 20 years, however, no ALC survey was submitted with the application to demonstrate the quality of agricultural land on site. It is recognised that CS Policy CP1 requires that planning permission should only be granted for proposals which avoid the loss of BMVAL whereas paragraph 187 of the NPPF only requires that planning decisions recognise the wider benefits from natural capital, including the economic and other benefits of the BMVAL. As the ALC map and current agricultural use indicate, the site may include BMVAL and the proposal would take out agricultural production within this area. As no survey has been submitted to support the application and to demonstrate grade of agricultural land that would be lost, the proposal conflicts with CS Policy CP1 and paragraph 187 of the NPPF and this weighs against the scheme and will be considered in the overall planning balance under its economic role.

Parameters:

35. The application is for outline planning permission with all matters (i.e. appearance, landscaping, layout and scale) reserved apart from means of access. As such, the location of buildings, internal roads or proposed planting are all matters for later consideration. The purpose an outline application is to demonstrate that the proposed quantum of development can be adequately accommodated within the constraints of the site. The application is accompanied by a Parameter Plan (which is not in an indicative form), which seeks to establish clearly identified maxima for the future Reserved Matters Application, such as access route, quantum of built area and open space, location of drainage features, play areas and maximum heights of

buildings. The application is also accompanied by an Indicative Masterplan (2522477.4 Rev C) showing one potential layout for the site in order to satisfy the basic test as to whether the proposed quantum of development (i.e. 95 units) can be accommodated within the site.

36. Paragraph 010 of the Planning Practice Guidance (PPG) "Design: Process and Tools" sets out how design should be considered for an outline application:

"Applications for outline planning permission seek to establish whether the scale and nature of a proposed development would be acceptable before fully detailed proposals are put forward. However, design is often considered at this stage in order to assist community engagement, inform an environmental impact assessment or design and access statement (where required) and provide a framework for the preparation and submission of reserved matters proposals."

[...]

"Design quality cannot be achieved through an outline planning application alone. Outline planning applications allow fewer details about the proposal to be submitted than a full planning application, but can include design principles where these are fundamental to decision making."

37. Paragraph 129 of the NPPF states that:

"planning decisions should support development that makes efficient use of land, taking into account:

(...)

d) the desirability of maintaining an area's prevailing character and setting (...); and

e) the importance of securing well-designed, attractive and healthy places."

Density

38. The location of the application site is along the boundary of Arborfield Cross settlement. MDD LP Policy CC02 states that for proposals at the edge of settlement (but located within the defined settlement) will only be allowed where they can demonstrate that the development respects the transition between the built-up area and the open countryside by taking into account the character of the adjacent countryside and landscape.
39. Whilst Policy CC02 does not apply to development proposed outside settlement boundary, it nevertheless highlights an important design principle that requires regard to be had to proposals achieving appropriate transition between built up areas and countryside. This is echoed in Policy IRS2 of the

ABNP which requires that proposals “*recognise, respect and preserve the identity and rural setting of settlements with regard to (a) scale and form of development and (b) density of development*”. Policy AD3 of the ABNP further states that proposals should “*Consider the density of any new development which must be in character with the surrounding area, respect the rural nature of the area and be designed to give an impression of spaciousness*”.

40. The Parameter Plan identifies that the built-up area would comprise 3.27 hectares and that green infrastructure would comprise 4.93 hectares. The proposed quantum of development (95 units) distributed on 3.27 hectares of land would achieve a density of approximately 29 dwellings per hectare (dph). The density of Arborfield Cross limited development location (including land occupied by school, pub and local shop) is approximately 17.5 dph. The development in Langley Common, to the north of School Road, has density of approximately 4 dph. In the context of the existing development and its density, the proposed quantum and density of development is considered wholly inappropriate as it would introduce a suburban development within a rural area and fail to provide appropriate transition between low-density development of Arborfield Cross and very low-density development to the north of School Road, and between the countryside beyond. It is also noted that the proposal would result in the increase in the number of households within Arborfield Cross by approximately 34%. Whilst the assessment whether the proposal would result in a disproportionate or inappropriate addition to the village cannot be determined mathematically, the overall assessment of the scheme contained in this report concludes that, due to the proposed quantum, the proposal would be unacceptable on these grounds.
41. Whilst there is an in-principle conflict with policy CC02 because of its outside of settlement location, the development would fail to meet the aims of this policy even if located within the settlement boundaries due to the appreciable and uncharacteristic step-up in density from the bordering development. Policy CC02 states ‘*planning permission for proposals at the edge of settlements will only be granted where they can demonstrate that the development, including boundary treatments, is within development limits and respects the transition between the built up area and the open countryside by taking account of the character of the adjacent countryside and landscape.*’ The higher density would fail to respect the transition between the built-up area of Arborfield Cross and the countryside.
42. This is reinforced within the NPPF, which under Paragraph 11d(ii) elevates the need for the decision maker to have ‘**particular regard**’ to securing well-designed places (Officer emphasis). Achieving well designed places requires development to have an appropriate relationship and transition from and to adjoining land uses and this will be explored in more detail in later sections.

Design Principles

43. Paragraph 137 of the NPPF requires that *“applications provide sufficient information to demonstrate how their proposals will meet the design expectations set out in local and national policy.”* It is recognised that the layout, scale, appearance and landscaping are all reserved matters not for determination at the outline stage. The submitted Illustrative Masterplan seeks to demonstrate how the proposed 95 dwellings could be accommodated on site within the proposed parameters. As such, the indicative layout has been examined to assess whether the proposed quantum of development is feasible.
44. Whilst an assessment of density in the preceding paragraphs can be a useful indicator as to how a site performs in meeting identified housing needs, it is generally not considered a good indicator in isolation as to the likely form, quality or appropriateness of any scheme. Therefore, while the Local Plan does not set specific density targets/requirements, and an efficient use of land is encouraged in national policy, this needs to be balanced against ensuring that such an approach is sympathetic to the context, the quality of life for the inhabitants, and the effect the density has on the overall design concept as advocated by the Local Plan.
45. The Illustrative Masterplan indicates that the proposed development would not be able to achieve minimum garden depths and separation distances set out in the Borough Design Guide SPD. This would result in either poor amenity standards for future occupiers and overlooking or expansion of built form into areas identified as open space on Parameter Plan. Whilst no housing mix and parking calculator have been provided to identify parking requirements, the Illustrative Layout does not incorporate any unallocated/visitor parking, which means that the proposal would be unacceptable in highway terms or, again, there would need to be further expansion of built form and hard surfacing into areas shown as open space. The Illustrative Layout relies on large proportion of dwellings to be accessed off cul-de-sac roads. The length of these cul-de-sac roads would not meet the criteria for access by fire engine and as such, would not be acceptable. This, again, would mean that there would need to be further expansion of built form and hard surfacing into areas identified as open space.
46. Moreover, as discussed at paragraphs 76 and 158 of this report, the currently proposed foul water drainage strategy assumes wastewater would flow by gravity. It is difficult to see how this can be the case for areas of land at levels some 10m lower than ground levels at the point of connection to public sewer along School Road.
47. Due to contributing density of the proposed development and based on the Parameter Plan drawing indicating a maximum scale of buildings of 10.5 meters, it is likely that some of the buildings shown on the Illustrative

Masterplan would be flats. This would not be an appropriate built form for an edge of settlement location on undulating fields in the countryside. As set out above, the development that currently defines the settlement edge is low density detached housing set within large plots with large gardens; including flats blocks would exacerbate the urbanising impact of the development on the settlement edge.

48. Overall, the access road and general parameters of the development would result in negative 'design' impacts. This includes the density of the development, cramped layout and inevitable shortfall of amenity space as a result of the parameters set out. The Borough Design Guide SPD and the National Design Guide refer to creating a 'sense of place', and the proposal would fail to achieve it based on the proposed quantum of development and Parameter Plans. Whilst the layout is indicative, the parameters of where the residential development will be located is proposed to be established in the parameter plan. The indicative layout shows multiple breaches of the minimum separation distances and garden depth in the Borough Design Guide and there are no obvious indications that these could be designed out at the Reserved Matters stage within the confines of the parameter plan.

Character of the Area:

49. The CS Policy CP3 *General Principles for Development* states that development must be appropriate in terms of its scale of activity, mass, layout, built form, height, materials and character to the area in which it is located and must be of high-quality design without detriment to the amenities of adjoining land uses and occupiers. This requirement is amplified by MDD LP Policy CC03 which requires that proposals protect or enhance the Borough's Green Infrastructure networks and promote accessibility, linkages and permeability between and within existing green corridors, as well as the integration with adjoining countryside. Additionally, it seeks to resist proposals that would result in the loss of areas of green infrastructure. The supporting text to the policy at paragraph 2.12 clarifies that green infrastructure networks include countryside, natural green areas in rural settings, green routes and public rights of way. MDD LP Policy TB21 requires development proposals to demonstrate how they have addressed the requirements of the Council's Landscape Character Assessment (LCA), including the landscape quality, landscape strategy, landscape sensitivity and key issues. It goes on to state that proposals must retain or enhance the condition, character and features that contribute to the landscape.
50. Paragraph 129(d) of the NPPF states that planning decisions should take into account the desirability of maintaining an area's prevailing character and setting. Paragraph 135 of the NPPF states that planning decisions should ensure that "*developments:*

a) will function well and add to the overall quality of the area;

(...)

- c) *are sympathetic to local character and history, including the surrounding build environment and landscape setting (...);*
- d) *establish or maintain a strong sense of place (...);*
- e) *optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space);”*

- 51. These character and design objectives outlined in the framework and deemed consistent with both the development plan, the adopted ABNP or emerging LPU.
- 52. The proposal's layout, scale, appearance and landscaping are all reserved matters and would therefore be assessed at the reserved matters stage. That being said, the submitted Illustrative Masterplan provides an illustration of the potential layout and how the site might accommodate the amount of development proposed.

Arborfield Cross Village

- 53. Whilst the proposed development has scale as a reserved matter, the maximum heights for the buildings are proposed as fixed development parameters. The maximum height proposed is 10.5m which translates into a three-storey building. Indeed, the Illustrative Masterplan appears to include a three-storey apartment block at the gateway into the development. It needs to be assumed that the outline planning consent, if granted, would permit the maximum height parameter to be exercised. Therefore, one of the key considerations is whether the resulting built form can provide appropriate transition between the Arborfield Cross village and countryside.
- 54. Arborfield Cross village has a form of a nucleated settlement that is very well contained with strongly vegetated boundaries. The northern boundary of the settlement is formed by a cluster of dwellings infilling the gap between playing fields and Arborfield Cross roundabout, and the Coombes Primary School with associated playing fields. The school and playing fields sit to the north of School Road along the stretch of the road measuring in excess of 300m. Beyond the school there are no residential dwellings along the School Road before the road enters the parish of Barkham at the junction with Wood Lane, approximately 250m beyond the edge of the school site. The proposal seeks to introduce new development beyond the edge of the village established by the school site.
- 55. It should be noted that school buildings (as well as residential development within the village) are up to two storeys in height; the school itself is set in wooded context and visually contained by vegetation when viewed both from School Road and PRowS. Residential development of Arborfield Cross

village along School Road (both to the north and south of School Road) is only clearly visible where buildings front School Road, in close proximity to Arborfield Cross roundabout, along the stretch of approximately 150m of School Road when measured from the roundabout. There are no dwellings fronting the remaining length of School Road (circa 550m) before the boundary with Barkham parish. Dwellings located to the south of School Road (Emblen Crescent and Anderson Crescent) have very limited visibility as they all have generous gardens (generally in excess of 20m) backing onto School Road, with views to the south limited through strong belt of vegetation on the southern side of School Road. The location and type of buildings along School Road contribute to the sense of leaving the village and to the transition between the village and the surrounding countryside.

56. Due to its location, the proposal site has no direct relationship with the village and would significantly extend the envelope of the village beyond the school site and surrounding vegetated edge to the east and north, which define the edge of settlement. The proposed high density of 29 dph is tantamount to a suburban development at would be at stark contrast with the village density of 17.5 dph. The proposed quantum and maximum scale parameter mean that the proposal would fail to achieve appropriate transition between the rural village of Arborfield Cross and the countryside. The location of the proposed development area (with dwellings of up to 10.5m in height) would introduce buildings that, due to existing topography, would be on the skyline and in stark contrast to the existing views from School Road of a tranquil countryside (see also Figure 4 below).
57. The sense of arrival in/departure from the village is created by the location of the existing build form, with visibility of dwellings associated with the village reducing from the roundabout towards east of School Road. The sense of arrival/departure is also created by the verdant character of School Road, which would be eroded by the proposal (the impact on School Road is discussed further in this report). Whilst School Road is lined with trees and other vegetation, the application site is visually prominent due to rising topography. The removal of vegetation along School Road to create vehicular access into the site, the development associated with construction of new access, as well as the introduction of the built form in a visually prominent location and unrelated to the village, would undermine the sense of arrival in/departure from the village.
58. The proposal would have adverse effect on the form of the village and surrounding landscape (as discussed below). It would appear as detached from the village's main built-up core and fail to read as an organic extension to the settlement, thereby eroding its character.

School Road

59. School Road is a designated Green Route. The MDD LP defines Green Routes as *“roads into settlements that are lined with trees and other vegetation, which make a significant contribution to the character and environment of the area and contribute to the Borough’s network of wildlife corridor”*.
60. School Road has a strongly verdant and quiet character, with trees and mature hedgerows enclosing it on both sides, creating a green tunnel effect. The verdant character of School Road is an essential component to the setting of the village. The submitted Arboricultural Implications Report identifies that three ash trees (72, 74 and 75) and parts of a group of trees (G23) would need to be removed to facilitate the construction of the proposed access road. Whilst this would indicate a relatively low-level of vegetation removal, the construction of new vehicular access into the site would require the removal of at least 60m of the existing vegetation and the embankment on which it is growing. The extent of the vegetation removal is shown in Figures 4 and 5 below.



Figure 4: Approximate extent of vegetation removal along School Road, looking to the east (Google Maps)



Figure 5: Approximate extent of vegetation removal along School Road, looking west (Google Maps)

61. These works and the required vegetation removal would not only significantly degrade the green character of School Road, but they would also open up views into the site to a high-density development unconnected to the village. This will have significantly adverse effects both on the Green Route of School Road, and the rural character of Arborfield Cross village to which the Green Route contributes, due to the formalising and urbanising effect resulting from the proposed access and associated highway infrastructure. Whilst there is scope to include new planting within the areas identified in the Parameter Plans as Green Infrastructure, the resulting impacts cannot be mitigated by new planting. As such, it is not considered that the assessment of the proposal in terms of the impact on School Road contained in the Landscape and Visual Impact Assessment (CSA-6541-01 Rev G) (“LVIA”) is accurate.

Countryside

62. The application site is located outside development limits, within the countryside. The Council’s Landscape Character Assessment (“LCA”) identifies the area within which the site is located as J2: Arborfield Cross and Barkham Settled and Farmed Clay. The LCA outlines the character of the landscape as strong, in good condition, due to the absence of roads and settlement, in combination with having a distinctive mix of interconnected woodland and pastoral and arable fields bounded by hedgerows. One of the key characteristics associated with this LCA area is the “*smaller scale rural patchwork of deciduous woodland and sheep pasture associated with the hills and incised coombe valleys in the south*”. The importance of this area in landscape terms was recognised in the recently produced (September 2024)

Wokingham Borough Council's "Valued Landscapes Assessment" (September 2024) ("VLA").

63. The Landscape Strategy for J2 is guided by the overall objective for enhancement:

"Certain elements of the landscape including the historic field systems, habitats, moats, rural lanes and wooded valleys should be retained/respected. Landscape enhancement should include better integration of the garrison in its landscape setting, and more general improvements to woodland, farmland and habitat management."

64. Paragraph 187 of the NPPF requires that decisions "contribute to and enhance natural and local environment by:

- a) *Protecting and enhancing valued landscapes (...);*
- b) *Recognising the intrinsic character and beauty of the countryside (...);"*

65. Whilst there is no statutory definition of the term "valued landscape", the Technical Guidance Note 21 produced by the Landscape Institute defines it as *"an area identified as having sufficient landscape qualities to elevate it above other more everyday landscapes"*.

66. The VLA incorporates the application site into the Barkham and Bearwood Valued Landscape, as shown in Figure 6 below:

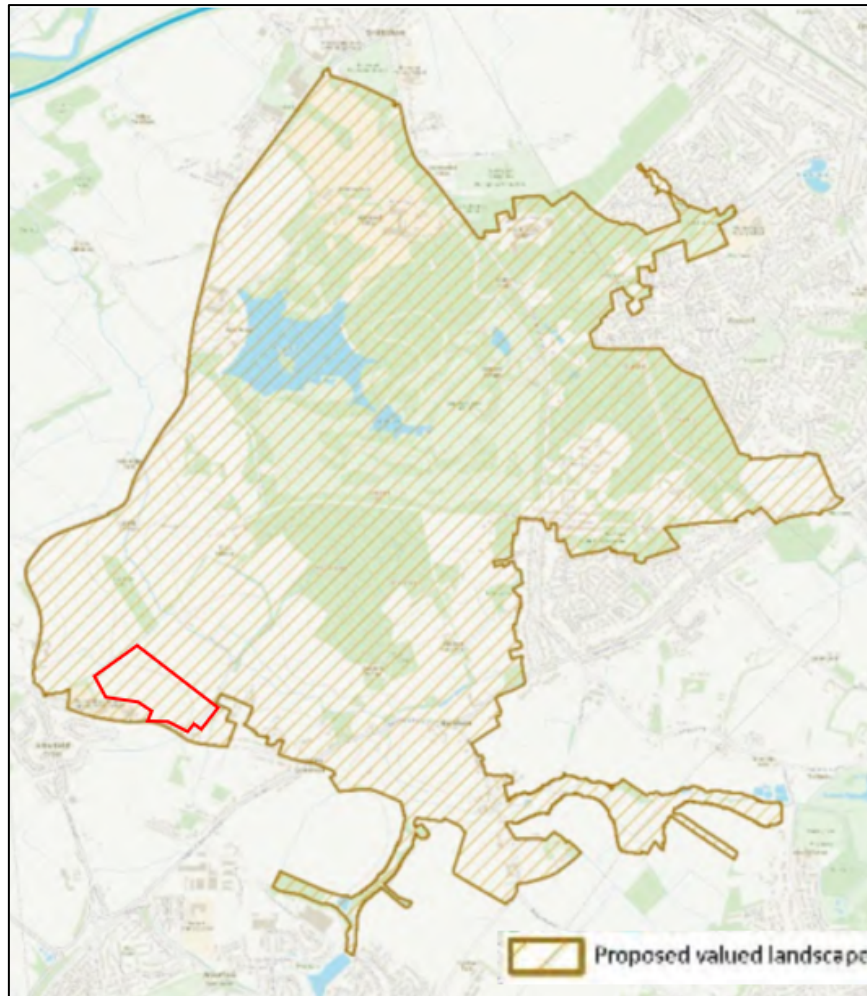


Figure 6: Extract from “Valued Landscape Assessment”: Barkham and Bearwood Valued Landscape

67. The above extract was re-produced from Wokingham Borough Council’s VLA prepared as part of the Local Plan Update, which was produced to aid the drafting of the emerging local plan policies. As recognised by the Secretary of State in *Braintree* appeal (ref APP/Z1510/W/18/3197293), Valued Landscapes need not be specifically identified or referred to in the current Local Plan:

‘If planning policies can only protect and enhance undesignated valued landscapes if they have an identified quality in the development plan, this would prevent any new undesignated valued landscapes from being protected by planning policies. Valued Landscapes have only existed as a planning consideration since the first version of the NPPF in 2012. The majority of local planning authorities do not have an adopted post-2012 development plan, which might be expected to identify valued landscapes and their quality. Restricting valued landscapes to either statutorily designated landscapes or those

identified in development plans would in practice very substantially reduce protection.”

68. The basis for including the area in the Barkham and Bearwood Valued Landscape was the range of landscape attributes the area contributes to the surrounding landscape. The attributes that perform this function are broadly outlined below and demonstrate that the site significantly contributes to and is an integral part of the Barkham and Bearwood Valued Landscape:

- The medieval trackway from Swallowfield to Wokingham shown on the Norden map of Windsore Forest (1607).
- The current BOAT, and other PROWs.
- The valley of the Barkham Brook creating an undulating topography / rolling topography and fieldscape.
- Wholly rural site – no sense of any urban area nearby / absence of built development.
- Strong scenic value to the landscape.
- Sense of relative tranquillity with very limited traffic noise especially as School Road is now a no-through road.
- Peaceful walking along BOAT's.
- Perception of the land as quintessential English Countryside.
- Significant views into and across the surrounding countryside and of the wooded hills at Bearwood and the Coombes from PROW and BOATs.
- Significant areas of ancient woodland (including Hazeltons Copse close to site - mapped since at least (Norden 1607, Map of the Forest of Windsor).
- Number of veteran trees on BOAT's adjacent to the site or close to site.
- Significant areas of lowland mixed deciduous woodland (a habitat of principal importance), tree and hedgerow cover.
- Grade II Listed Langleypound Farmhouse (part of which is late 16th Century, so Elizabeth I).

69. Furthermore, it has been identified that the following valued landscape attributes also relate to the site (due to their close relationship with Landscape Character Area L1: Bearwood Wooded Sand and Gravel Hills):

- Elevated wooded hills forming a backdrop to the wider landscape and western settlement edge of Wokingham. The wooded hills provide physical and visual separation between settlements, including

Wokingham and Reading, and the future development at Arborfield Garrison (Arborfield SDL) to the south of the area.

- Varied topography which forms an intricate range of landscape spaces and backdrops emphasised by the largely enclosed and wooded nature of the core of the area, with views out over farmland to the wider countryside.
 - Large expanses of mature mixed woodland which are designated as BAP priority habitats and LWS and provide important ecological habitats and a sense of place. Stands of Scots pine and beech woodlands on the hilltops provide characteristic landmark features.
 - The distinctive mosaic of interconnecting mixed woodland interspersed with small scale pastoral fields in the south of the area which provide scenic qualities and visual diversity.
 - Medieval landscape features which survive on the boundary of later historic estates, such as wide tracts of former common land which provide a cultural record of the past and strong time depth
 - Recreational value particularly in The Coombes through the presence of byways, footpaths and bridleways which allow enjoyment of the landscape.
 - A golf course and cricket club offer formal recreational opportunities.
 - Peaceful secluded character with naturalistic qualities and experience of dark skies, largely unsettled and with limited access, which provides a rural retreat in close proximity to urban areas.
 - Contrast of enclosed views within woodland and long views across the Loddon Valley towards Reading, and south towards Barkham and beyond
70. Therefore, the WBC's Landscape Officer considers the site to form part of the Barkham and Bearwood Valued Landscape ("BBVL"), which represents landscape of high value with a high sensitivity to residential development. The BBVL is experienced in views along the School Road and surrounding PRowS (Cole Lane and Wood Lane). Views from Cole Lane (BOAT ARBO9), whilst filtered by vegetation when in leaf, presently are of the rural countryside devoid of any development related to the village (apart from a very short section of the lane of approximately 100m from Arborfield Cross roundabout). The proposed change from agricultural fields to residential housing estate would fundamentally change the character of the area and the perception of quickly leaving the village and entering the countryside (with agricultural landscape to both sides of the Cole Lane), when viewed from the west.

71. Officers note that the proposal is for an outline application with all matters reserved except for means of access. Aside from the new access into the site off School Road, the proposal includes a secondary access which would serve as emergency access and provide a pedestrian/cycle link onto Cole Lane. In order to accommodate emergency vehicles (such as fire engine), the access would need to be at least 3.7m in width. The submitted AIA indicates that the emergency access would be only 3.5m in width. Therefore, there is an inconsistency in information submitted as to the width of access proposed.
72. Cole Lane is a narrow, single lane track, approximately 2.5m wide, therefore it is understood that this lane would not be suitable for use by emergency vehicles without widening it. Moreover, the minimum width of emergency access would require clearing of at least 3.7m of vegetation. This does not take into account any further clearance to achieve swept paths for fire engine to manoeuvre in and out of the site via emergency access. The woodland along Cole Lane is made up of a range of scrubby vegetation as well as larger trees, therefore, clearing a route though even if this avoids major trees, would impact on the integrity of the woodland block and would allow direct views into the site. The approximate location and extent of vegetation to be removed is shown in Figure 7 below:



Figure 7: Emergency and pedestrian/cycle access onto Cole Lane

73. As such, this would impact on the character of ARBO09 to the detriment of its users. It would further erode the rural character of the lane by introducing views into residential site, where none currently exist. The removal of vegetation would lead to erosion of valued landscape attributes identified above. Together, this aspect of proposal would result in significant adverse effects on visual receptors and on the character of the area. It is unclear whether the proposal would be required to upgrade the surface on Cole Lane to make it suitable for emergency vehicles and to function as pedestrian/cycle link. However, given that the red line boundary does not incorporate Cole

Lane, the potential impact of widening the PRoW and upgrading the surface have not been considered.

74. Turning to views from east, issues in relation to views from School Road have already been discussed in the preceding paragraphs. Aside from this, the WBC Landscape Officer raised concerns in relation to views from the south-east corner of the site. Due to land levels rising to the west, the proposal will be visible to the pedestrians throughout the year and in particular in winter months. The proposal would extend the visual envelope of the village that is currently generally only experienced from within the settlement, due to strongly vegetated boundary and the land form. The extension of the visual envelope of the village into the countryside and away from its nucleated form would result in significant adverse effects on visual receptors and substantially change the perception of where the village starts.
75. There is ARBO10 BOAT running along the eastern boundary of the site and to the north, beyond fields abutting the site to the north. ARBO10 is a PRoW which commences at the junction of Wood Lane with School Road and runs north-east before veering to the west to join with ARBO9, north of the Barkham Brook Valley. From then on, ARBO9 provides a link across the countryside, the Coombes woodland, into the outskirts of Wokingham Town. The boundary of the site along ARBO10 is sparsely vegetated with clear views of the application site in close proximity. Whilst the Parameter Plan indicates that built area would be located some distance from the boundary with ARBO10, due to the sparse vegetation and ground levels of the site dropping in the north-east direction, the proposed development would be clearly visible from this PRoW.
76. It is relevant to refer here to the feasibility of the proposed foul water strategy which assumes that wastewater will flow by gravity. The north-west and north-east areas of the proposed residential development are shown on ground levels some 10m lower than the proposed point of connection. This indicates that the proposed foul water strategy is not feasible without either significant changes to ground levels or reliance on pumping station to enable the wastewater to flow to the point of connection. Whilst this is something that can be addressed at a Reserved Matters stage and via a suitably worded condition, it has not been adequately demonstrated that the proposed quantum of development cannot be satisfactorily incorporated within parameters plans.
77. Views from the north, including the point where ARBO10 joins ARBO9, are of countryside, with no views of Arborfield Cross village due to landform and strongly vegetated boundary of the village, which contribute to the wooded skyline of the BBVL. The proposed development would alter these views and have detrimental impact on the BBVL. The impact of the proposal on views from ARBO9 has been assessed by the WBC Landscape Officer who

concluded that these would have moderate/slight adverse effects, although recognised that the impacts need to be considered in the context of the site forming part of BBVL.

78. Additionally, the proposal would cause further impact on the character of the area at night as a result of introducing street and residential lights that would need to be incorporated by the scheme. Presently, there are no lights visible across this site and, due to rising levels, these would be visible from a range of viewpoints, detrimentally impacting the character of the area and quality of the BBVL and this change is considered to be high in magnitude.
79. The proposal would lead to the loss of agricultural fields which make a significant contribution to the BBVL. As outlined above, the proposal would cause significant harm to the Valued Landscape and the character and appearance of the area. The proposed change from agricultural fields to residential development would fundamentally change the rural character of the site, leading to degradation of quality of BBVL. As the site forms part of the unspoilt countryside with very limited urban influences, the sensitivity of the site and surrounding landscape is high. It is considered that the submitted LVIA underestimates the significance of the effect of the scheme on the landscape character of both the site and its surroundings.

Neighbouring Amenity:

80. The application is for an outline planning permission with matters relating to layout and scale reserved. The submitted Parameters Plan identifies an area intended to accommodate future dwellings. The nearest residential building (Langleypond Farmhouse) is located over 100m from the area indicated for residential development in the Parameters Plan. As such, no concerns arise in terms of impact on neighbouring amenity of residential uses.
81. The application site is immediately adjacent to the Coombes School and associated playing fields. Due to the distance between the developable area and school site, as well as intervening vegetation, no concerns are raised on grounds of proximity to the school site, subject to appropriate boundary treatment/landscaping details.

Public Open Space:

82. Core Strategy Policy CP3 *General Principles for Development* establishes an overall requirement for 4.65 ha/1,000 population of open space (POS) within new development. This is amplified by MDD LP Policy TB08 *Open Space*, sport and recreational facilities standards for residential development which sets out the requirements for different types of open space.
83. The requirements for the proposed quantum of development of 95 residential units is shown in Table 1 below:

Open Space typologies	Requirement (m ²)
-----------------------	-------------------------------

Parks and public gardens	2,508
amenity greenspace	2,234
play areas	570
civic space	23
outdoor sports facilities	3,785
cemeteries (in plots)	4
allotments	1,186

Table 1: Public Open Space requirements

84. The submitted Indicative Layout and supporting information do not outline how all elements of public open space would be delivered. Notwithstanding, the parameter plans show that the overall amount of open space proposed on site would be capable of delivering the policy-compliant quantum of development that is appropriate to be delivered on site. The WBC Green Infrastructure Officer has reviewed the proposal and considered that if it is not feasible to provide certain typologies on site (e.g. allotments), it would be appropriate to secure off-site contribution in lieu of on-site provision. They also commented that the proposed locations for play areas as shown in the parameter plan would not be appropriate and instead, it should be consolidated into a larger, more centralised play area, which would enhance the development's usability and communal value.

Heritage and Archaeology

Archaeology

85. Core Strategy Policy CP3 *General Principles for Development* and MDD LP Policy TB25 *Archaeology* require the archaeological impact of development to be taken into consideration.
86. The application is accompanied by a Desk Study Report (JT0584 Rev 2), which identified that there is potential for prehistoric or medieval rural activity, although the results of the geophysical survey were inconclusive. Given that the application site falls within an area of archaeological significance, it cannot be ruled out that archaeological remains may be present on site. The Berkshire Archaeology has reviewed the proposal raised no objection subject to a condition requiring a programme of archaeological works to be submitted.

Heritage

87. Under Section 66 of the Planning (Listed Building and Conservation Area) Act 1990, in determining an application which affects a listed building or its setting, the Local Planning Authority "*shall have special regard to the desirability of preserving the building or its setting or any features of special*

architectural or historic interest which it possesses". The duty in Section 66 of the Planning (Listed Building and Conservation Area) Act 1990 must also be considered as a material consideration in the planning balance.

88. Paragraph 212 of the NPPF states that "*when considering the impact of a proposed development on the significance of a designated heritage asset (which includes both listed buildings and conservations areas), great weight should be given to the asset's conservation...irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.*"
89. Paragraph 215 of the NPPF states "*Where a development proposal will lead to **less than substantial harm** to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.*"
90. Paragraph 219 of the NPPF requires that Local Planning Authorities "*should Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance*".
91. Consistent with this, Policy CP3 *General Principles for Development* of the Core Strategy and Policy TB24 *Designated Heritage Assets* of the MDD LP establish that development should not have a detrimental impact on important heritage features or their setting and should conserve and, where possible, enhance their important character and special architectural or historic interest.
92. The application site lies approximately 30m to the west of Langleypond Farmhouse, which is a Grade II Listed Building, and approximately 170m to the east of a cluster of Grade II Listed Buildings at Newland Farm. Arborfield Cross Conservation Area is located nearby to the south of the application site.
93. Langleypond Farmhouse listing states:

"Late C16, altered C18, C19 and mid 20. Timber framed, encased in vitreous brick with red dressings; tiled gabled roof, false timbering on gables with roughcast infill. H-plan, crosswings on north and south, small one storey C20 extension at rear. 2 storeys. One large late C16 flank chimney on right, one later ridge chimney, one on left hand crosswing.

Entrance front: brick string course. 2 and 3-light C20 leaded casements, some with segmental brick arches. Main part 3 bays with blocked centre window on first floor, C20 entrance door

under small hipped roof on left. One bay crosswing gable projecting on left and one bay crosswing gable on right, flush with main part. Interior: 2 moulded beams exposed in left hand crosswing on ground floor, with a fragment of an outer beam with a tudor rose carved in relief. Inglenook chimney with spice alcove in main part."

94. Land levels within the application site rise to the west of School Road, which means that the proposed residential dwellings would become visible as the backdrop to the existing structures associated with agricultural use located on the corner of School Road and Wood Lane. This would result in the impact on the wider setting of Langleypond Farmhouse that provides historic context and visual backdrop in which the heritage assets are experienced. Additionally, the loss of agricultural fields would lead to erosion of the historic and visual context provided by the open fields to the Langleypond Farmhouse and as such, it would impact the setting of the listed building.
95. The WBC Heritage Officer has reviewed the submission and commented that whilst the current proposal would likely result in a lesser harm than that identified in the previous application (reference 180596), the proposal would nevertheless result in a less than substantial harm to designated heritage assets, which includes harm to the Arborfield Cross Conservation Area. The less than substantial harm to the listed building is considered in the context of public benefits of the scheme in the Planning Balance section of this report.

Sustainability of location

96. Core Strategy Policies CP1 *Sustainable Development* and CP6 *Managing Travel Demand* require consideration of the travel impacts of development, emphasising the importance of reducing the need to travel, particularly by private car, and require development to make provision for a choice of sustainable forms of transport including improvements to existing transport infrastructure including roads, public transport and facilities for pedestrians and cyclists, including those with reduced mobility.
97. Core Strategy Policy CP6 b) directs development to locations which minimise the distance people need to travel and where there are choices of mode of transport available (or will be by the time of development). Core Strategy policy CP9 *Scale and Location of Development Proposals* identifies the application site as Countryside. The Borough Design Guide SPD states "*if places are to be sustainable then the aim should be to create: Walkable neighbourhoods, with a range of facilities within 10 minutes walking distance of residential areas, which encourage people to travel on foot or by bicycle.*" Policy GA3 of the ABNP states that "*improvements to public transport will be supported*".
98. Paragraph 109 of the NPPF states:

Transport issues should be considered (...) using a vision-led approach to identify transport solutions that deliver well-designed, sustainable and popular places. This should involve:

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

99. Paragraph 115 of the NPPF requires that “sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location” and that “safe and suitable access to the site can be achieved for all users”, Paragraph 117 of the NPPF goes on to say that applications “should give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and **second** – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use” and “address the needs of people with disabilities and reduced mobility in relation to all modes of transport”.
100. It must be noted that the revised NPPF requires decision makers to have particular regard to directing development to sustainable locations (Para 11(d)(ii)) in addition to making effective use of land, securing well-designed places and providing affordable homes.
101. The site lies outside the defined boundary of Arborfield Cross limited development location and approximately 430m north-west of the Arborfield Strategic Development Location boundary. The application is accompanied

by a Transport Assessment (2305-083-TA-01 Rev A) ("TA") and a Framework Travel Plan (2305-083-TP-01 Rev A) ("FTP").

102. Active Travel England ("ATE") have been consulted on the proposed and issued their standing advice. The application is not supported by an assessment of actual walking distances to local services; the qualitative analysis of walking and cycling routes has also not been included in the TS. However, the proposal has been assessed by officers as part of this process.

Walking

103. The National Design Guide defines "walkable" as local facilities being no more than 10 minute walk (800m radius) for most of dwellings. Paragraph 6.3.1 of the Manual for Streets explains that propensity to walk is influenced not only by distance, but also the quality of the walking experience. The Chartered Institution of Highways and Transportation (CIHT) document 'providing for journeys on foot' advises that 400 metres is a desirable walking distance outside of city centres; 800 metres is stated as acceptable, and 1,200 metres is the preferred maximum. The document clarifies that the suggested walking distances are for pedestrians without mobility impairment. These distances are also cited in the Wokingham Highway guidance Living Streets. The recommended walking distances for people with mobility impairments are up to 150m (without a rest), as outlined in paragraph 3.4 of the Inclusive Mobility Guide (2021) ("IMB"), although these depend on the nature of the impairment and are lower e.g. for users of walking stick or cane (50m). The IMB recognises that these distances are affected by other factors, such as gradients and weather conditions. The IMB further recommends (paragraph 4.3) that generally gradients should not exceed 1 in 60, but it recognised that where not feasible, gradients should not exceed 1 in 12 as an absolute maximum (due to the physical effort required to get up a steep gradient for wheelchair users and the risk of wheelchair toppling over).
104. The TA states that facilities within Arborfield Cross (consulting room for Swallowfield Medical Practice, primary school, pub, convenience store and village hall) are all within walking distance. The walking isochrones diagram provided in Figure 2.4 of the TA identifies that the proposal would be located within 800m walking distance to these facilities. It is unclear, however, whether these distances were measured from the site boundary or from the centre of application site. Notwithstanding, Figure 8 below shows the approximate walking distance from the centre of the site as being in excess of the recommended 800m.

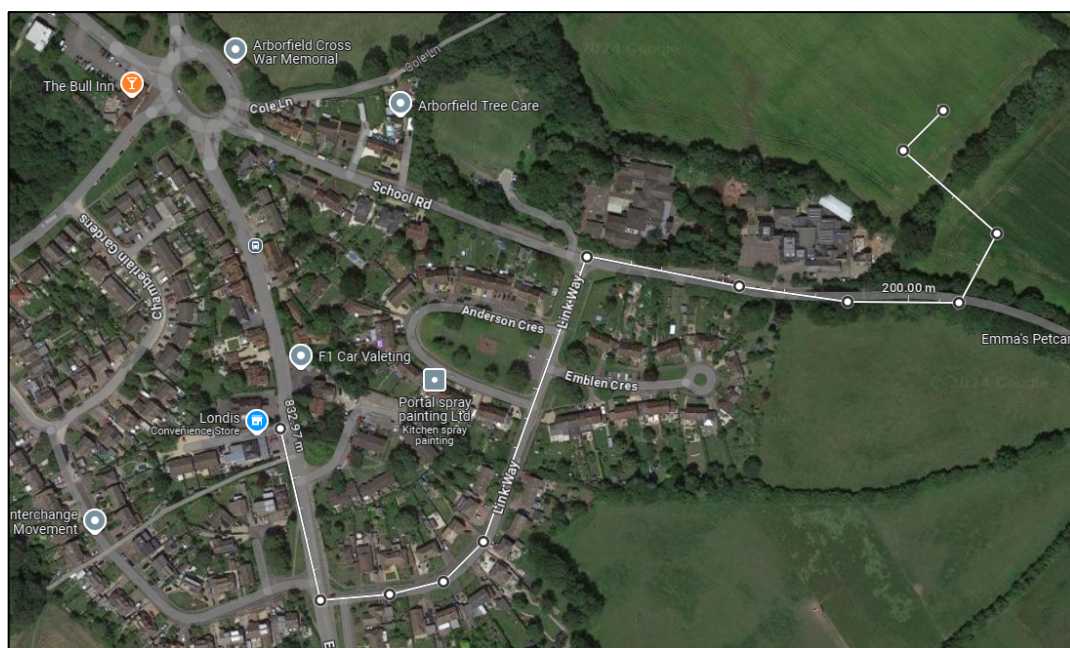


Figure 8: Walking distance to convenience store

105. Further services are and will be available in Arborfield Green, including new District Centre to be delivered as part of the Strategic Development Location. The submitted TA indicates that Arborfield Green would be accessible via walking, however, the walking distance to the District Centre would clearly be in excess of the recommended walking distances, via unlit and narrow routes (via Eversley Road or Langley Common Road).
106. Paragraph 82 of the National Design Guide requires that pedestrian and cycling routes are direct, safe, convenient and accessible. Section 1.5 of the Local Transport Note 1/20: Cycle Infrastructure Design (“LTN 1/20”) sets out principles which represent the essential requirements to achieve more people travelling by cycle or on foot, and requires that routes are coherent, direct, safe, comfortable and attractive.
107. School Road comprises a narrow footway (1.4m in width), limited street lighting and low level of surveillance. Whilst the site survey submitted with the Flood Risk Assessment indicates that the footpath gradient would not exceed 1 in 10, although there are currently with no seats for people with reduced mobility nor there are any level “landings” for wheelchair users. The IMG outlines, however, that gradients steeper than 1 in 20 can only be managed by some wheelchair users and only over stretches up to 10m. The levels along School Road are approximately 1 in 16 along a sampled stretch of a road which measured in excess of 130m. As such, the existing pedestrian access route via School Road is considered to have limited attractiveness for future occupiers to use it to access facilities as well as bus stops located nearby. It is also considered unsuitable for people with reduced mobility. It is noted, however, that the application proposes to widen the existing footway along School Road to a minimum of 2m as an improvement

to the existing pedestrian movement network, although this would not make it suitable for people with reduced mobility.

108. The alternative pedestrian route (via Cole Lane) is a Public Right of Way which, whilst less steep than School Road, it is unlit and comprises trodden earth, unlevel surface and stone. The WBC Public Rights of Way Officer commented that a section of Cole Lane could be improved, however, this has not been included by the applicant as part of the proposal.

Cycling

109. The submitted TA states that the majority of local cycling will occur on-street. There are no dedicated cycle routes that would segregated cycling routes to Arborfield Garrison where a wider range of services is and will be available. Figure 2.6 of the TA shows a Cycle Catchment diagram and demonstrates that a range of services would be located within 5km cycling distance, including Arborfield Green, Wokingham Station and Wokingham Town Centre.
110. However, the TA does not provide a qualitative assessment of the existing cycle routes. Officers note there are no cycle routes connecting the site with the cycle route network, except for a cycle route along Cole Lane which links Arborfield Cross with Wokingham via Coombes Lane and Sandy Lane (the two latter ones are both shared use on-street cycling routes). Cole Lane is an undulating and unlit track route and as such, it would be limited to a proportion of users in terms of its attractiveness, comfortability or safety. Neither School Road, Eversley Road nor Reading Road offer segregated cycle routes. School Road is relatively quiet no-through road. School Road joins with Langley Common Road which, similar to both Reading Road and Eversley Road, is a 40mph road. At such speeds, the LTN 1/20 outlines that the roads provide suitable cycling infrastructure for only few people and would exclude most potential users and have safety concerns. Moreover, Eversley Road offers a less-direct route due to give-way single lane narrowings of the road which would require cyclists to stop and start. It is not considered that the existing road infrastructure would encourage cycling among future residents other than a small portion of the more confident and experienced cyclists.
111. The submitted TA outlines that a new pedestrian/cycle link onto Cole Lane would be delivered “to increase the permeability of the site by active modes of travel”. Currently, Cole Lane is an unlit, narrow track road approximately 2.5m in width. It comprises unlevel surface with trodden earth and stones. Whilst the proposed point of access into the site off Cole Lane is acceptable in principle from Highways’ perspective, no details have been submitted to demonstrate how Cole Lane would be upgraded to make it suitable for use by users of all abilities as a pedestrian/cycle link into Arborfield Cross village nor how the new proposed access would work. Moreover, as discussed in

paragraphs 129 to 130 below, insufficient information has been provided to demonstrate that this access is viable for use by emergency vehicles.

Public transport

112. The Local Transport Note LTN 1/24 “Bus User Priority” (“LTN 1/24”) recommends that bus stops should be spaced approximately 400m apart in urban areas creating a walking time of about 5 minutes between stops; it also recognises that spacing may be much greater in rural areas. More frequent stops should be avoided as this leads to increased journey times and can result in poor quality of journey for passengers. The Buses in Urban Developments guide produced by CIHT recommends that where planning new bus routes, bus stops serve catchments of dwellings within 300m walking distance. However, it also recognises that there should be a degree of flexibility with regard to walking distances where it would otherwise lead to a low-frequency or indirect bus service.
113. The supporting text to CS Policy CPS identifies the frequency of “good” bus service:
 - a) *At least a thirty minute service frequency during peak times (7:00 to 9:00 and 16:00 to 19:00 Monday to Saturday); and*
 - b) *At least an hourly service frequency during off-peak hours (9:00 to 16:00 and 19:00 to 22:00 Monday to Saturday and between 7:00 and 22:00 on Sundays).*
114. The nearest bus stop is located at the Swan stop on Eversley Road, which is served by Leopard 3 service. The submitted TA states that the peak frequency of this service is 3 buses per hour. Whilst this is correct in relation to routes to Arborfield and Reading, only one of those buses continues to Wokingham.
115. There is no bus stop located (or proposed) within 400m walking distance when measured from the centre of the site – Figure 8 above shows that the approximate walking distance would be in excess of 800m for the north-bound service and in excess of 600m for the south-bound service (via Cole Lane). Whilst the frequency of bus service to Wokingham is one per hour and no service is provided on Sundays, the service to both Arborfield and Reading meets the above requirement. As such, the overall bus service is considered good from the Swan bus stop.
116. Wokingham railway station is accessible via the Leopard 3 bus service, however, as outlined above, the access to Wokingham railway is not supported by “good” bus service. Notwithstanding, Leopard 3 bus service provides good service to St Mary’s Butts stop, which is within 10 walking minutes from Reading railway station.

117. Turning to walking routes to and facilities at the Swan bus stops, the walking routes have been assessed in paragraphs 103 to **Error! Reference source not found.** of this report, where it was concluded that they do not amount to safe, direct, convenient and accessible routes for people of all abilities (in relation to two routes via School Road and Cole Lane).
118. In terms of bus stop facilities, the south-bound bus stop on Eversley Road, unlike the north-bound bus stop, offers no seating or shelter, although there is real-time passenger information system provided at both bus stops. The submitted TA indicates that there would be improvements to bus stops: an additional bus stop north-bound in close proximity to Arborfield Cross Roundabout and that a contribution is proposed for the improvements to the south-bound stop (cantilevered bus shelter). Whilst neither of these improvements would deliver a safe, convenient and accessible routes to bus stops, it is recognised that providing a shelter at the south-bound bus stop could provide a more attractive waiting place to which people would more readily travel for a longer distance. The WBC Public Transport officer has reviewed the proposed location of a new bus stop and considers it unacceptable due to impacts the additional bus stop would have on journey times. Instead, it was recommended that a financial contribution could be secured to improve both bus stops (to improve the waiting area to make it a more attractive space and to provide a new sheltered bus stop). It is noted that Leopard 3 service is being delivered as part of the Arborfield SDL Bus Strategy. As such, a contribution would be required towards enhancement of the bus service to increase frequency of bus service to Wokingham. Notwithstanding, as the application is not acceptable in principle, no further engagement was carried out with the applicant in relation to potential improvements to bus stops and to walking infrastructure improvements.

Conclusion on Sustainable Location & Accessibility

119. In summary, the application represents a sub-optimal location in terms of sustainability of location, with reference to availability of services within acceptable walking distances and failure to identify insufficient opportunities to enhance otherwise inadequate walking and cycling routes to services. Together these reasons fail to demonstrate a vision-led approach to identify transport solutions that would deliver well, designed, sustainable and popular places, as required by the NPPF. Therefore, the proposal would be contrary to Core Strategy Policies CP6 and CP9, section 9 of the NPPF and National Design Guide.

Traffic Impact on Highway Network:

120. Core Strategy policy CP6 *Managing Travel Demand* establishes that development should not cause highway or traffic related environmental problems: any adverse effects upon the local transport network arising from development should be mitigated, road safety should be enhanced and

development should not lead to highway problems or traffic related environmental problems. Policy GA1 of the ABNP seeks to minimise additional traffic on unsuitable roads.

Trip Rates

121. The submitted TA outlines that TRICS database was used as a methodology to demonstrate the level of vehicular trips anticipated to be generated by the proposal; these would be 40 trips during the AM peak hour and 40 trips in the PM peak hour. However, no justification of parameters selected for this calculation has been provided. Notwithstanding, the WBC Highways Officer has carried out the assessment using the Borough's approved trip rates and compared these with results produced in the TA: there would be 55 AM peak hour and 49 PM peak hour trips (i.e. 15 and 9 trips more respectively than shown in the TA). As such, the increase in trip rates on School Road is not considered to be unacceptable. It was concluded that the proposed increase in trip rates would not result in capacity issues at the Arborfield Cross Roundabout, on Reading Road or Eversley Road.

Travel Plan and Car Club

122. Paragraph 118 of the NPPF requires that developments that will generate significant amounts of movement should be required to provide a travel plan. The Wokingham Borough Council runs the My Journey initiative which is a borough-wide travel plan that helps to minimise the impact of new development on the surrounding transport network
123. The application is accompanied the FTP which outlines options for providing a residential travel plan for future residents of the development to promote alternative forms of travel. The Council operates a borough-wide active and sustainable travel behaviour change campaign "My Journey", which is open to applicants to utilise in lieu of submitting a Travel Plan for an individual site. The applicant confirmed in the submitted FTP that it is assumed the Travel Plan would be produced for development post occupation. Whilst the submission of Travel Plan could be secured by condition in the event of an approval, its monitoring would be required to be secured as a planning obligation. As an alternative, a planning obligation could be entered into to pay contribution towards My Journey plan in lieu of submitting a Travel Plan.
124. The FTP stated that the applicant would "consider the inclusion of car clubs as part of future Reserved Matters applications" which would offer an alternative to car ownership. As worded, there is currently no commitment to providing car club at outline application stage. Given that inclusion of car club would need to be secured through legal obligations, it would not be appropriate to secure this at Reserved Matters stage.

Construction Management Plan

125. The application is not accompanied by a framework construction plan to outline inform a future construction management. Notwithstanding, the submission of detailed construction management plan could be secured by condition.

Access:

126. It is proposed that the application site would be accessed through a new proposed access off School Road. Matters relating to means of access are not reserved and need to be considered as part of this application.
127. In order to deliver a new access, School Road would need to be realigned to continue into the site with a priority junction on the minor arm on School Road. The submitted TA outlines the location and design of the new access, which would be at least 5m wide and incorporate 2m pavement on both sides.
128. The TA includes visibility splays a 20mph speed limit which have been reviewed by the WBC Highways Officer and are acceptable, subject to detailed design of the access. The TA also includes swept pats for a refuse vehicle to demonstrate how it could safely pass other vehicles. However, the submitted swept paths used incorrect dimensions for a large refuse vehicle and no swept paths have been provided for a fire appliance. No swept paths have been provided for vehicles accessing and egressing the southern part of School Road. Moreover, swept paths would still need to be provided for the illustrative masterplan layout, which have not been included. As such, the submitted information fails to demonstrate the proposed access arrangement would not result in unacceptable highway impacts.
129. The proposal is also for a second access into the site which would serve as emergency access and provide a pedestrian/cycle link onto Cole Lane. In order to accommodate emergency vehicles (such as fire engine), the access would need to be at least 3.7m in width. The submitted AIA indicates that the emergency access would be only 3.5m in width. Therefore, there is an inconsistency in information submitted as to the width of access proposed.
130. Cole Lane is a narrow, single lane track, approximately 2.5m wide, therefore it would not be suitable for use for emergency vehicles. No swept paths or visibility splays have been provided to demonstrate that this access would be feasible and could function as an emergency access. As such, it has not been demonstrated that the proposed means of access for emergency vehicles is viable. It is also noted that no

Parking and Internal Roads:

Parking

131. Core Strategy Policy CP6 *Managing Travel Demand* and MDD LP Policy CC07 *Parking* require appropriate vehicle parking, in line with the council's standards (MDD LP Appendix 2). For residential developments, demand for unallocated car parking is calculated, depending on the location, size and

tenure of property and the amount of unallocated parking (with garages counting as half a space).

132. The submitted TA states that no parking details are provided at this stage as this is something that could be conditioned at the Reserved Matters stage. Although the application is in outline and details of parking provision would not be fixed until the reserved matters stage it is necessary to establish an approach to parking provision in order to demonstrate that an appropriate amount of car parking can be provided and integrated into the development without harm to the character and amenities of the area. This is also discussed in paragraphs 35 to 48 of this report.
133. The Illustrative Masterplan shows that parking would be generally provided to the side of dwellings and within garages. Several buildings show parking space along the frontages or within courtyards. No visitor parking appears to be included within the Illustrative Masterplan and no illustrative housing mix is provided to understand the requirements for land take for unallocated parking. As such, it has not been demonstrated that the proposal could accommodate the anticipated provision of parking within the site.
134. The TA indicates that cycle parking would be in line with Borough standards, which is a matter that could be assessed as part of Reserved Matters application.
135. The TA outlines that electric vehicle charging could be conditioned. The electric vehicle charging is a matter dealt with under Building Control Regulations Approved Document S.

Internal Roads

136. The TA does not clarify whether the internal roads would be offered for adoption. In any event, a planning obligation would be required to ensure that roads are built to adoptable standards. If the roads are not proposed for adoption, planning obligation would also be required to ensure that a management company is set up to secure the future maintenance of internal roads.
137. The TA does not include visibility splays or swept paths for a fire tender and refuse vehicle on internal roads. Therefore, it has not been demonstrated that the illustrative internal road layout would not result in unacceptable impact on highway safety within the site.

Public Right of Way:

138. MDDL policy CC03 *Green Infrastructure, Trees and Landscaping* also seeks to promote accessibility for pedestrian and cyclists, with a specific focus on permeability between and within green corridors including public rights of way such as footpaths, cycleways and bridleways. Policy GA2 of the ABNP states that “*proposals should not inhibit the delivery of the wider network of Greenways and other PRowS*”. It goes on to state that proposals

should where possible support the achievement of a network of all-weather routes, better connectivity and provision of better access to the countryside.

139. The application site lies in close proximity to Cole Land (ARBO9) and Wood Lane (ARBO10) which both are Byways Open to All Traffic ("BOAT"). Cole Lane, which provides a PRoW link into Wokingham from Arborfield Cross has been identified as forming part of the route to be upgraded to a Greenway (Greenway Route B) in the Council's Rights of Way Improvement Plan. This has not yet been consented and as such, currently there are no plans to upgrade BOAT ARBO9 to a Greenway Route.
140. The application proposes to use ARBO9 to provide emergency and pedestrian/vehicular access into the site. The WBC Public Rights of Way officer has reviewed the proposal and raised no objection in terms of capacity of either ARBO09 or ARBO10 being able to accommodate the proposed increase in population, subject to a planning obligation requiring ARBO9 to be resurfaced.
141. As the application is not recommended for approval, further engagement was not deemed necessary, although comments provided by the WBC PRoW officer have been shared with them. As discussed in paragraphs 71 to 73 of this report, further information would be required to establish the impact of any proposed upgrades or alterations to ARBO9, which lies outside the boundary of the application site.

Affordable Housing:

142. Core Strategy policy CP5 *Housing mix, density and affordability* requires residential development to provide a mix of tenures, including a proportion of affordable housing. The proportion depends on the size of the development, location and whether the land was previously developed: for developments outside development locations the requirement is for 40% of proposed dwellings to be delivered as affordable homes.
143. Paragraph 66 of the NPPF, specifically referred to in the footnote to Paragraph 11(2)(ii) requires that in respect of proposals for major residential development, the mix of affordable housing required meets identified local needs, across Social Rent, other affordable housing for rent and affordable home ownership tenures.
144. As such, the proposal is required to provide 40% of affordable homes. The application is accompanied by the Planning Statement (August 2024 2522477.1 Rev -) which confirms that the proposal would delivery 40% of homes as Affordable Housing.
145. The WBC Affordable Housing Officer has reviewed the proposal and raised no objection, subject to an appropriate housing mix and tenure being secured in a Section 106 legal agreement. On the basis of the proposed quantum of development, the Affordable Housing mix should incorporate 8 x 1 bed

maisonettes, 6 x 2 bed maisonettes, 11 x 2 bed houses, 8 x 3 bed houses and 5 x 4 bed houses. It is recognised, however, that the housing mix and location would be established under the Reserved Matters application. All affordable dwellings would need to be built to M4(2) standard with 4-bed houses built to M4(3) standard. The tenure mix would need to include 70% units as social rent, 25% units as first homes and 5% as shared ownership.

Flooding and Drainage:

Flood Risk

146. Core Strategy Policy CP1 *Sustainable Development* and MDD LP Policy CC09 *Development and Flood Risk (from all sources)* establish that new development should avoid increasing and where possible reduce flood risk.
147. The application site lies within Flood Zone 1, i.e. outside areas at risk of flooding. Footnote 63 to paragraph 181 of the NPPF requires that a site-specific flood risk assessment is provided for all development, including in Flood Zone 1, where the site is greater than 1 hectare. The application is accompanied by a Flood Risk Assessment and Drainage Statement HD083-R001 Rev 3 ("FRA").
148. By virtue of being residential development, the development falls within the definition of "More Vulnerable Development" as per Annex 3 to the PPG Flood Risk and Coastal Change classification. Table 2: Flood risk vulnerability and flood zone 'incompatibility' confirms that "More Vulnerable Development" is compatible with locations within Flood Zone 1. As such, no exception test is required.
149. The submitted FRA assessed the risk of flooding from various sources, which was deemed to be low for all potential sources of flooding listed. The WBC Flood Risk & Drainage Officer has reviewed the proposal and has raised no objection on grounds of flood risk.

Drainage

150. MDD LP Policy CC10 *Sustainable Drainage* requires surface water to be managed in a sustainable manner, maintaining greenfield run-off rates and volumes, taking into account climate change.
151. Paragraph 182 of the NPPF requires that proposals "*should incorporate sustainable drainage systems to control flow rates and reduce volumes of runoff, and which are proportionate to the nature and scale of the proposal. These should provide multifunctional benefits wherever possible, through facilitating improvements in water quality and biodiversity, as well as benefits for amenity.*"
152. The Green Infrastructure Framework produced by Natural England sets out a range of design principles to ensure high quality of design of development. Improving water management through green infrastructure, which improves

water quality and natural filtration, promotes sustainable drainage, brings amenity, biodiversity and enhanced visual landscape benefits.

153. These principles are also echoed in the CIRIA guidance, as well as WBC SuDS Strategy, which both require that water is kept above ground to help achieve high quality landscaping, creation of habitat and attractive places (including amenity, health, well-being and recreation). These aspects of the scheme are discussed elsewhere in the report (see paragraphs 35 to 48 above).
154. The application is accompanied by the Flood Risk Assessment and Drainage Statement (HD083-R001 Rev 3) (FRA). It is proposed that the surface water would be attenuated on site before being discharged into the existing watercourse at two points of discharge. The applicant confirmed that infiltration is not viable method of managing surface water discharge due to geological factors (i.e. the ground comprises London Clay which is not suitable for infiltration). The discharge into the watercourse would be limited to greenfield run off rates which have been calculated at 1.7 l/s/ha, which mirrors the pre-development QBar runoff rates per hectare.
155. These calculations were based on the Illustrative Masterplan and assumed 65% of the developable area would be impermeable. The impermeable area of the development was calculated at 2.78 hectares. The proposed discharge rates have been calculated to take into account all storm events up to and including the 1 in 100 years storm event +40% allowance for climate change.
156. The application is accompanied by a Drainage Strategy (Appendix 3 to the Flood Risk and Drainage Statement) which shows two detention basins where surface water would be attenuated. The Drainage Statement (section 7.25) outlines that the proposal would incorporate a network of trapped gullies, pipes and SuDS features (such as permeable paving, swales and basins). However, no schematic accompanies the application to demonstrate that this strategy is viable on site within the built up area fixed on the Parameter Plan. There is no schematic available to illustrate how surface water will traverse various green infrastructure features indicated in the Drainage Statement before reaching detention basins. Therefore, it has not been demonstrated that the proposed drainage strategy, which would adequately fulfil its amenity, biodiversity and landscape functions, can be adequately accommodated on site. Whilst this aspect of the proposal could be dealt with at Reserved Matters stage, officers are not convinced that the parameter plans can accommodate the proposed quantum of development with sufficient space being available to incorporate overground features such as swales. However, no objection was raised by the WBC Drainage & Flood Risk Officer in terms of risks of surface water flooding in a post-development scenario, subject to conditions,

Foul Water

157. The submitted FRA indicates that the strategy for dealing with foul water drainage would be through a connection to the existing public sewer system. Thames Water has been consulted on the proposal and raised no objection in terms of capacity of the foul water sewerage network.
158. However, the proposed foul water drainage strategy sets out that “*due to topography of the site and location of the existing foul sewer point of connection, wastewater from the site can flow entirely by gravity to the receiving public sewer*”. The submitted indicative foul route shown in Appendix 3 shows that the point of connection would be along School Road. As discussed elsewhere in the report, the land levels rise from approximately 50m AOD along the north-west part identified for development to some 60m AOD in the middle area of the site, towards the southern boundary. The point of connection with public sewer is also set at similar level of 60m AOD. The topographical levels do not indicate that gravity flow will work. Pipe invert levels have not been provided to demonstrate that the gravity flow and, therefore, the proposed foul water strategy, would work.

Ecology:

159. Core Strategy Policies CP3 *General Principles for Development* and CP7 *Biodiversity* establish that proposals should not have a detrimental impact on ecological features. Species and habitats of conservation value should be protected and the ability of a site to support fauna and flora, including protected species, should be maintained and enhanced. Where the need for development outweighs the need to safeguard nature conservation importance and there are no less harmful alternatives available harm should be mitigated or compensated for. In addition, MDD LP Policy TB23 *Biodiversity and Development* requires proposals to enhance and incorporate new biodiversity features, provide appropriate buffer zones between development and designated sites as well as habitats and species of principle importance for nature conservation and ensure ecological permeability.
160. The application is accompanied by Ecological Assessment (DFA24071 Rev V3) which outlines steps taken by the applicant to determine the presence of protected species or species of raised conservation status and which contains an assessment of potential impacts of the proposal on these.

Great Crested Newts

161. The application site lies largely within a green impacts zone for Great Crested Newts (“GCN”) with a relatively small portion of site along the eastern boundary shown to be within an amber impact zone for GCN. This means that there is generally low likelihood of GCN being present within the site. The submitted report identifies three ponds within the 500m buffer zone of

application boundary, however, the WBC Ecologist confirmed that there are two more points that were not included in the report. Out of three ponds identified, one was surveyed but was found to be dry at the time of survey. The two remaining ponds that were identified were not surveyed due to poor ecological connectivity to the site. The WBC Ecologist confirmed that no concerns are raised with regard to the two ponds that were not identified due to their relatively isolated location and poor connectivity to other ponds and the application site. Therefore, they are satisfied that GCN are likely absent from the application site.

Bats

162. The submitted Ecological Assessment outlines that several surveys were carried out, however, some were still outstanding at the time the assessment was written. This has been reviewed by the WBC Ecologist who considers that insufficient information was provided to enable the assessment of potential impacts of the proposal on bats and of suitability of any mitigation measures to mitigate these impacts. As such, it has not been demonstrated that the proposal would not have unacceptable impacts on bats, which are protected species.

Reptiles

163. The submitted Ecological Assessment outlined the details of reptile survey carried out in the period of May – August 2024 by placing 55 artificial refugia across the site. The results of the survey have been reviewed by the WBC Ecologist who reviewed it against the reptile survey provided as part of previous application (reference 180596), in which a local population of Adder was recorded within this site.
164. The recent reptile survey was carried out in the period which is unlikely to allow Adder hibernation sites to be identified (which falls to be late winter and early spring). Out of the widespread reptile species, Adders are the least likely to take up and use artificial refugia, and as such, the survey should have been better adapted to target this species. The WBC Ecologist commented that *“if Adders are still using the site, this would significantly elevate the importance of the site because of the rarity of species, which is declining at a national level”*. Given the unsuitable timing of the survey and inadequate methodology employed to assess the site for the presence of Adders, it is not considered that the impact of the proposal on reptile species of principal importance has been adequately assessed.

Ecological Enhancements and Permeability

165. The submitted Ecological Assessment does not make any species-specific enhancement recommendations or recommendations to maintain ecological permeability, as required by MDD LP Policy TB23. Notwithstanding, the WBC Ecologist would be content to secure appropriate enhancement and

permeability measures via a suitably worded condition, subject to further information being provided as outlined in preceding paragraphs.

Biodiversity Net Gain (“BNG”):

166. Section 70A of the Town and Country Planning Act 1990 (as amended) (“TCPA”) sets out that where planning permission is granted, it is subject to a pre-commencement condition to secure that the biodiversity gain objective is met. Such objective can only be met where the biodiversity value attributable to the development exceeds the pre-development biodiversity value of the onsite habitat by at least 10%. The biodiversity value of habitats or habitat enhancement is to be calculated in accordance with the biodiversity metric published by the Secretary of State. The current metric is Metric 4.0 and provisions contained in the Section 70A of the TCPA came into effect on 12 February 2024 for any applications submitted on or after that date.
167. The application is accompanied by the Biodiversity Net Gain report (dated September 2024, reference DFA24073) as Appendix 1 in the Ecological Assessment. It is also accompanied by a completed Statutory Biodiversity Metric (dated 16 September 2024) (“SBM”), completed using Metric 4.0, which identifies baseline for habitat, hedgerow and watercourse expressed in units.
168. Given that the statutory pre-commencement condition referred to above requires an uplift of 10% on the pre-development biodiversity value, it is necessary to ensure that the SBM accurately represents the baseline conditions on site. The WBC Ecologist has reviewed the accompanying information and submitted line-by-line comments as set out in Tables 2 and 3 below:

Habitat baseline			
Broad habitat	Habitat type	Area (ha)	WBC Ecologist comments
Grassland	Modified grassland	4.9	Do not agree yet. Suggest habitat type is actually 'Temporary grass and clover leys'. Not clear from description in Ecological Assessment whether also contains any 'Arable field margins'.
Cropland	Cereal cops	3.25	Do not agree yet. Not clear from description in Ecological Assessment whether also contains any 'Arable field margins' but definite difference to some margins from site visit photographs.
Individual Trees	Rural tree		Missing individual tree information for those trees in hedgerows that are proposed to be removed.

Table 2: Habitat baseline LPA comments

On-site Hedge Baseline			
Hedge number	Habitat type	Length (km)	WBC Ecologist comments
H1	Native hedgerow with trees	0.197	Do not agree. Described as species rich in the submitted Ecological Assessment. Drainage information indicates hedgerow is associated with a ditch. Need to explain downgrade in metric. Need to see the evidence that fails condition C1.
H2	Native hedgerow with trees	0.134	Do not agree. Tree survey indicative of the hedgerow being species rich. This needs to be more carefully evidenced if the lower status habitat type is to be applied. Also, drainage information indicates that the hedgerow is associated with a ditch. Need to see the evidence that fails condition C1.
H3	Native hedgerow with trees	0.27	Do not agree at this stage. Species list indicates could be species rich. The habitat type needs to be more clearly evidenced. Need to see the evidence that fails condition C1.
H4	Native hedgerow with trees	0.167	Do not agree at this stage. Should H4 be split into 2 parts to reflect the different nature of length defined by G23 (in tree survey) and length defined by G24? Potential for length defined by G23 to be species rich - will need more detailed consideration / evidence in the Ecological Assessment. Need to see the evidence that fails condition C1.
H5	Native hedgerow with trees	0.07	Do not agree. Our GIS indicates that this hedgerow is associated with a ditch. Potential for length to be species rich - will need more detailed consideration / evidence in the Ecological Assessment. Need to see the evidence that fails condition C1.

Table 3: On-Site Hedgerow Baseline

169. To summarise, a concern exists that the Biodiversity Net Gain report and the SMG do not accurately represent the value of baseline conditions onsite. As such, it is not possible currently to assess how the necessary biodiversity gain would be achieved. The submitted Planning Statement (August 2024 2522477.1 Rev -) indicates the applicant's commitment to deliver 15% of BNG onsite, however, given that concerns are raised about the BNG baseline, it is unclear whether onsite delivery could be achieved.

Thames Basin Heaths Special Protection Area (“TBH SPA”):

170. CS Policy CP8 *Thames Basin Heaths Special Protection Area* states that where development is likely to have an effect on the Thames Basin Heaths Special Protection Area (TBH SPA), it is required to demonstrate that adequate measures to avoid and mitigate any potential adverse effects are delivered. CS Policy CP7 *Biodiversity* reinforces this requirement.
171. The application site lies within 5km zone of the TBH SPA. The TBH SPA is also a Site of Special Scientific Interest (Bramshill SSSI). By virtue of being designated as the SPA, the importance of Bramshill SSSI for biodiversity is elevated to both national and international level as an area selected to protect rare, threatened or vulnerable bird species.
172. Paragraph 195 of the NPPF states that *“the presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site”* unless appropriate assessment concludes otherwise.
173. The proposal would result in a net increase of up to 95 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 (DFA24072 Rev V3) which sets out that an agreement has been reached with the University of Reading to secure the necessary capacity (1.82ha) 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.
174. The proposed measures to mitigate recreational pressure from the scheme have been reviewed by the WBC Ecologist against the latest consumption and allocation figures provided by the University of Reading to the WBC. These figures indicate that there is not 1.82ha of SANG capacity remaining at the Ridge SANG. As such, it has not been demonstrated that a viable SANG mitigation measures could be secured. Whilst the applicant may wish to seek an alternative SANG site from University of Reading, the Wokingham Borough Council, as the Competent Authority, can only be confident of strategic SANG supply if the University of Reading is willing to enter into a planning obligation to secure a new, alternative SANG site and allocate the relevant portion of it to this scheme.
175. The proposal would fail to secure appropriate mitigation of impacts associated with increase in population and resulting pressure on the TBH SPA. Paragraph 195 of the NPPF specifically refers to habitat sites and states that the presumption in favour of sustainable development does not apply in cases where the Competent Authority is not satisfied that the proposal can adequately mitigate its impacts. In this instance, it has identified that insufficient capacity exists within the SANG identified to mitigate the

impacts of the proposal. It follows in such circumstances, that paragraph 11(d)(i) would be engaged which states that application of policies in this Framework provides a strong reason for refusing the development proposed.

176. However, as decision maker and the Competent Authority, the Council has considered the proposal against paragraph 11(d)(ii) of the NPPF, as such matters are reasonably able to be resolved and secured as part of any legal agreement. This has not been secured at the time of decision, therefore, a pragmatic approach is taken to the application and the presumption in favour of sustainable development under paragraph 11(d)(ii) of the NPPF is considered to apply in this case. Therefore, the tilted balance is engaged.

Environmental Health:

Noise and Air Quality

177. Core Strategy Policy CP1 *Sustainable Development* seeks to avoid development in areas where noise may impact on the amenity of future occupants and MDD LP Policy CC06 *Noise* reinforces this, requiring proposals to demonstrate how noise impacts on sensitive receptors (both existing and proposed) have been addressed. Core Strategy Policy CP1 *Sustainable Development* establishes that development should minimise the emission of pollutants into the wider environment.
178. The site is not located in close proximity to obvious sources of major noise, although it is that the Parameter Plans identifies built form to be located approximately 30m from the boundary with the Coombes Primary School. The application has been reviewed by the WBC's Environmental Health Officer who raised no objections, subject to conditions requiring noise assessment to be carried out to identify whether any mitigation measures would be required and whether any plant proposed to be installed as part of development would need to be attenuated.
179. The quantum of the proposed development would not be of a size where additional traffic would create adverse air quality, and such issues are generally caused by traffic queuing for long periods or high volume transport routes. Moreover, the site is not located in a designated Air Quality Management Area. The WBC's Environmental Health Officer raised no object on these grounds.

Contamination

180. Core Strategy policy CP1 *Sustainable Development* requires development to minimise the emission of pollutants, limit any adverse effects on water quality (including ground water) and avoid areas where pollution may impact upon the amenity and safety/health of future occupiers.
181. The application is accompanied by a Desk Study Report (JT0584 Rev 2), which recommends that soil investigations are carried out prior to any

development commencing to determine the nature and extent of contamination that may be present on site. The WBC's Environmental Health Officer raised no object on these grounds subject to conditions to secure site investigations and an appropriate remediation scheme if required.

Employment Skills:

182. MDD LP Policy TB12 *Employment Skills Plan* indicates that proposals for major development should be accompanied by an Employment and Skills Plan (ESP) to show how the proposal accords opportunities for training, apprenticeship or other vocational initiatives to develop local employability skills required by developers, contractors or end users of the proposal.
183. The application is accompanied by the Economic Benefit Statement (August 2024 2522477.3.SM Rev -), however, no references are made within to the MDD LP requirements and employment skills targets. It is acknowledged that the proposal is for an outline planning permission, therefore, the proposed floorspace, on which the necessary employment skills targets are based, is currently unknown.
184. Notwithstanding, the proposal fails to demonstrate how it would deliver employment and training outcomes in line with MDD LP Policy TB12. In absence of a Section 106 legal agreement, the application fails to secure the necessary employment skills plan.

Sustainable Construction:

185. Core Strategy Policy CP1 *Sustainable Development*, amplified by MDD LP Policy CC05 *Renewable energy and decentralised energy networks*, requires development to contribute towards the goal of zero-carbon development by minimising energy consumption and incorporating on-site renewable energy features: at least a 10% reduction in carbon emissions should be achieved through renewable energy or low carbon technology in addition to levels of reduction required through the Building Regulations in force at the time of the submission of planning application.
186. The Environment Agency has identified the Thames region as an area of Water Stress and Core Strategy Policy CP1 *Sustainable Development* requires development to reduce water consumption. The MDD LP Policy CC04 *Sustainable Design and Construction* requires that all new homes meet the internal potable water consumption targets of 110 litres or less per person per day (including a 5l external water allowance).
187. The submitted information does not set out any targets to demonstrate how planning policies relating to sustainable construction would be complied with. Given that the application is not acceptable in principle, further engagement was not deemed necessary, although the relevant consultation response has been shared with the applicant prior to determination. As such, the

application is contrary to CS Policy CP1, MDD LP Policies CC04 and CC05 and WBC Sustainable Design and Construction SPD.

Infrastructure:

Water Network

188. Thames Water have been consulted on the proposal with regard to the existing water network infrastructure and advised that it would not be able to accommodate the needs of this development. It recommended a condition requiring appropriate network upgrades to be carried prior occupation to accommodate additional demand or that a phasing plan is agreed to deliver appropriate infrastructure. This is in line with the legal duties of utility providers contain within the Water Act 1991.

Education

189. Policy CP2 of the Core Strategy requires that:

“new development contributes to the provision of sustainable and inclusive communities (including the provision of community facilities) to meet long term needs (...) [through addressing requirements of]: (...)

b) children, young people and families, including co-ordination of services to meet their needs;”

190. The School Place Planning Manager has reviewed the proposal and advised that whilst the precise impact on school capacity would depend on the exact quantum and dwelling types/bedroom sizes that would be approved at Reserved Matters stage, it would be acceptable to seek mitigation through a financial contribution. It was also confirmed that the Coombes CoE Primary School is undersubscribed, therefore, it has not been demonstrated that financial contribution would be necessary to make development acceptable in planning terms as capacity exists to accommodate primary school age children at the Coombes school. A financial contribution was also requested towards secondary school provision on the basis that the Bohunt School is currently over-subscribed. However, no specific project was identified towards which the contribution could be allocated and no costing provided to establish the amount of financial contribution required. Therefore, it is not considered that the requested contribution would be fairly and reasonably related in scale to the proposal.

Healthcare

191. Policy CP2 of the Core Strategy requires that:

“new development contributes to the provision of sustainable and inclusive communities (including the provision of community

facilities) to meet long term needs (...) [through addressing requirements of]:

a) an ageing population, particularly in terms of housing, health and wellbeing;

b) children, young people and families, including co-ordination of services to meet their needs;"

192. The supporting text to the policy confirms that community facilities include development for health. This is in response to "Aspirations and Spatial Issues for the Borough" outlined in the Core Strategy (paragraph 2.68) in which it is identified that the issues to be addressed in Core Strategy are maintenance and enhancement of all infrastructure, including healthcare.
193. The NHS Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board ("ICB") is a statutory NHS body to commission primary care services and is responsible for primary care estates development. The ICB has been consulted on the proposal and identified that Finchampstead GP Surgery is over capacity. To mitigate the impacts arising from increase in population, the ICB sought a contribution towards expansion of Finchampstead GP Surgery.
194. Officers sought clarification as to the availability of other surgeries in close proximity to the application site (a branch of Swallowfield Medical Practice at Arborfield GP surgery and South Reading & Shinfield Group Medical Practice). The ICB subsequently issued a revised consultation response in which it identified that Swallowfield Medical Practice, which has a branch at Arborfield Cross, is also over capacity. Swallowfield Medical Practice operates their NHS GPs across their premises with gross internal area of approximately 700m². It advised that based on the "Premises Principles of Best Practice Part 1 – Procurement and Development" published by NHS, a practice of a patient list size of over 14,000 would require a GP practice of at least 1,000m². The ICB advised that Swallowfield Medical Practice currently has a patient list of 15,412 and would not be able to accommodate any new patients from the proposed development. As such, it has been demonstrated that capacity issues that exist at the GP practice which covers Arborfield Cross in their catchment area. The ICB confirmed that the capacity issues would be exacerbated by the proposed development. In order to mitigate this, a financial contribution would be required to be secured through a Section 106 legal agreement to commission a pre-project study, which could be funded in one of two ways, depending on the outcomes of the pre-project study: either a reconfiguration of the internal layout or an expansion to provide additional clinical space.
195. The ICB also confirmed that the funding sought would be towards capital project funding, rather than funding of healthcare services (which is provided

by the Central Government), and that it does not receive funding for capital projects to increase capacity at existing GP surgeries to meet growth in population.

196. The WBC Infrastructure Delivery Plan (September 2024) produced as part of the Local Plan Update identifies Swallowfield Medical Practice (which uses premises Arborfield Cross) to have capacity deficit and that no funding has been identified at this stage to deliver capacity upgrades.
197. Therefore, it is considered that the proposal would need to mitigate impacts of the associated increase in population on the capacity of the Swallowfield Medical Practice catchment area (which operates Arborfield Cross GP surgery).
198. The submitted Planning Statement (August 2024 2522477.1 Rev -) indicates that the applicant is willing to enter into the Section 106 agreement with regard to matters pertaining to healthcare. Given that the application is not acceptable in principle, further engagement was not deemed necessary, although the relevant consultation response has been shared with the applicant prior to determination. Based on the information submitted, the current proposal fails to demonstrate how it would contribute to the provision of healthcare facilities.

Planning Balance

199. The Council cannot demonstrate a 5-year housing supply and therefore the development must be assessed in line with Paragraph 11d(ii) and against the policies in the NPPF taken as a whole. The three overarching objectives contained within paragraph 8 of the Framework seek to balance growth and local community needs against protection of the natural, built and historic environment. The benefits and disbenefits are therefore considered against these three broad topic areas below. Whilst the policies which are most important for determining the application are out of date by virtue of the absence of a 5-year housing land supply, that does not mean the policies carry no weight. The weight attached to the development plan policies is a matter for the decision maker(s).

Economic

200. As with all housing development, the proposal would result in economic benefits. This is broadly set to arise from the short-term economic contribution of construction of up to 95 homes, longer term household expenditure by future residents and economic output of a portion of new residents who would be in employment. CIL payments, Council Tax Receipts and New Homes Bonus would also be an economic benefit of the proposal. Although none of these are unique to a scheme of this size.
201. In terms of negative economic impacts, the proposal has the potential to result in the loss of BMVAL, although due to its limited proportion relative to

the borough's overall supply, the likely economic impact from such loss is unlikely to be significant and therefore this weighs moderately against the economic contribution made by the development

- 202. The applicant failed to demonstrate commitments to the delivery of policy-compliant employment skills outcomes. However, as these would be capable of being secured by a legal agreement, no weight is attached.
- 203. The development is therefore considered to perform an overall positive economic role, however in light of the above factors is deemed to carry limited weight accordingly.

Social

- 204. The provision of 95 new homes, including affordable housing, would assist in furthering the social objective of sustainable development, although, as outlined in the report, it is unlikely that this quantum of development is satisfactorily achievable on-site within the development areas identified in the Parameter Plan. Notwithstanding, the provision of market and affordable housing is a weighty benefit in favour of the development given the housing land supply shortfall and acute identified affordable housing need. Whilst the previous over-supply of housing is no longer specifically referred to in the NPPF, it must be recognised that a contributing factor in the identified shortfall in the council's housing land supply is not as a result of under-delivery, but is in fact due to a significant over delivery in recent years, reducing the bank of land with extant planning permissions. This remains a material moderating factor against the full weight able to be given to the supply of additional housing.. It is therefore appropriate that substantial weight, rather than very substantial weight is afforded to the benefits of this scheme of 95 homes, in contributing to the council's housing land supply position.
- 205. The proposal would provide public open space on the site and connectivity with PRoW network. However, there are existing public spaces that serve existing residents in Arborfield Cross, located much more conveniently than the proposed areas of open space. Moreover, it is not considered that the provision of public open space would deliver public benefits as it is required to make development policy compliant and acceptable in planning terms. Therefore, this carries neutral weight in the planning balance. The proposed pedestrian/cycle connection to ARBO9 PRoW would generally serve only the future occupants as means of getting to local facilities via an alternative route, however, the site itself would not function as a destination to residents of Arborfield Village, and as such, the connection would not confer a benefit that could be afforded public benefit.
- 206. Whilst no legal agreement has been submitted to secure healthcare contributions, officers note the applicant's commitment to secure this. The NHS contribution sought by the ICB would increase surgery capacity,

although the contribution would only mitigate the impacts of increase in population associated with the scheme and would not address the existing capacity issues at Swallowfield Medical Practice. As such, this aspect of the proposal has limited weight in planning balance.

207. Overall, the development is therefore considered to perform an positive social role, which is afforded significant weight.

Environmental

208. There would be significant harm to the character and appearance of the countryside, Bearwood and Barkham Valued Landscape and Arborfield Cross village. This is because the proposal would result in the loss of undeveloped open agricultural fields and lead to the loss of valued landscape attributes. It would also have a harmful impact on the Arborfield Cross village as it would appear as detached from the village's core and would fail to read as an organic extension to this settlement. Due to the distance from the village and character of School Road, the proposal would fail to create a legible or integrated extension to a nucleated pattern of the village. These disbenefits are given substantial weight. The proposal would also lead to erosion of green character of School Road which is designated as Green Route and be harmful to the views from and the quality of PRow's network. Overall, this impact is given significant weight.
209. The proposal would affect the setting of the listed building, although this harm would be less than substantial. In light of public benefits of the scheme discussed here, this harm is given limited weight.
210. There would be a harmful erosion of the gap between the settlements of Barkham Hill and Arborfield. These impacts would be prominent, perceptible and lasting and magnified by the level of visibility of the land and the role these particular fields play in maintaining the gap. The erosion of gap would further lead to physical and visual coalescence of Arborfield Cross Village with Langley Common. This disbenefit is given substantial weight.
211. The conflict with the spatial strategy of the plan weighs against the application and the Inspector for the Lodge Road Appeal (appeal reference APP/X0360/W/22/3309202) gave the conflict with the spatial vision in the development plan significant weight.

“For reasons set out earlier in this decision, I consider that the appeal proposal would be in clear conflict with this spatial vision and the aforementioned policies, which I have already concluded should carry significant weight in this appeal, notwithstanding the absence of a deliverable 5-Year HLS. This weighs very heavily against the appeal proposal.”

212. In this instance, it is appropriate to afford significant weight to this conflict with the Council's spatial strategy.

213. The proposed quantum of development within the parameters submitted for approval would result in a cramped and a poorly laid out scheme in which has not been demonstrated to achieve minimum separation distances, adequate private amenity space and appropriate quantum of parking and would fail to achieve appropriate transition into countryside. The road layout and parameters for development would result in a development with the access and spine roads having poor passive surveillance. This conflict is given moderate weight.
214. The applicant has also failed to demonstrate that the proposal would be acceptable in relation to highway matters including highway safety, which attracts moderate negative weight. Moreover, the applicant failed to provide sufficient information to consider feasibility of the means of access by emergency vehicles onto Cole Lane.
215. The site is within a less-than-optimal location in terms of accessibility, whereby future residents would be reliant on private motor vehicle. The applicant failed to demonstrate how the future occupants of the new development, including those with mobility issues, would not be physically restricted from accessing existing facilities and services, by means of transport other than the car. This is given moderate weight. The proposed improvements to public transport, whilst not all acceptable, would nevertheless provide a benefit to the wider community. This benefit is given moderate weight. The proposal to consider a car club at Reserved Matters stage displays no commitment to secure this as part of outline planning permission and this would need to be achieved through a legal agreement. In any event, a provision of a car club could not be viewed as delivering improvements in terms of accessibility via non-motorised modes of travel. As there is no commitment to provide car club as part of this permission, no weight is attached to this.
216. The applicant has failed to demonstrate that the proposal would not result in unacceptable impacts on protected species, in particular given the rarity of Adders. However, given that additional surveys and adequate mitigation measures could be secured to ensure interests of protected species can be appropriately protected, no weight is given to this conflict.
217. The submitted Biodiversity Net Gain assessment is not considered to accurately present the value of baseline conditions onsite. As such, it is not possible currently to assess how the necessary biodiversity gain would be achieved. However, in the event that the required BNG cannot be achieved on site, it could be delivered off-site instead through BNG credits. Therefore, this attracts neutral weight in planning balance. The applicant's commitment to delivery 15% BNG onsite (which would need to be secured by a legal obligation) carries moderate positive weight.

218. There would be a temporary environment impact from the construction phase of the development associated with quarrying, processing and transportation of materials along with the general construction on site and emissions from travelling to and from the site. This impact is given limited weight.
219. The applicant failed to demonstrate commitments to policy-compliant sustainable construction methods and reduction in carbon-dioxide emissions from the operational phase of the development. However, as these would be capable of being secured by condition, these conflicts attract only neutral weight.
220. Due to the above identified harm and policy conflicts the development is not considered to perform a positive environmental role, and this weighs substantially against the scheme.

Community Infrastructure Levy (CIL):

221. When planning permission is granted for a development that is CIL liable, the Council will issue a liability notice as soon as practicable after the day on which the planning permission first permits development. Completing the assumption of liability notice is a statutory requirement to be completed for all CIL liable applications.

The Public Sector Equality Duty (Equality Act 2010):

222. In determining this application the Council is required to have due regard to its obligations under the Equality Act 2010. The key equalities protected characteristics include age, disability, gender, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief. The relevant sections in the report, in particular relating to the accessibility to services, outlined the concerns that persons with protected characteristics as identified by the Act may have different needs, experiences, issues and priorities in relation to this particular planning application.

Environmental Impact Assessment

223. Schedules 1, 2 and 3 to the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) respectively set out: (i) Development requiring EIA, (ii) the types of development where an EIA could be required if certain thresholds and criteria are reached, and, (iii) the selection criteria for screening schedule 2 development. The proposal falls within category (b) of Urban development projects and meets the indicative criteria and thresholds in that the size of the application site is more than 5 hectares.
224. The application site partially falls within an area that has previously been subject to EIA screening (ref 180567), which concluded that the proposal was not an EIA development. Whilst part of the application site was not included in the assessment, the overall quantum of development proposed is less than

previously proposed. Officers are of the view that the proposal would not result in impacts more significant than the previously proposed scheme and as such, it is considered that the proposal would not require an Environmental Impact Assessment.

Conclusion and Planning Balance

225. The council cannot demonstrate a 5-year housing land supply and paragraph 11(d) of the NPPF therefore states that permission should be granted unless:
- i) *The application of policies in this Framework that protect areas of assets of particular importance provides a strong reason for refusing the development proposed; or*
 - ii) *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination*
226. The presumption in favour of sustainable development under paragraph 11(d)(ii) of the NPPF is considered to apply, notwithstanding the lack of appropriate measures being secured to mitigate the impacts on the TBH SPA as outlined in paragraphs 170 to 176. Therefore, the tilted balance is engaged.
227. The proposal would provide benefits that weigh in favour of the application. These include the provision of new market and affordable homes, economic benefits associated with construction and expenditure in the local economy of the future residents, as well as receipts in the form of CIL and Council Tax payments. Other identified benefits would include improvements of public transport, contribution towards healthcare infrastructure and enhanced on-site BNG. Together, these aspects of the proposal weigh positively in the planning balance.
228. However, as noted, there are weighty material factors that weigh against the scheme, including the conflict with the spatial strategy, erosion of settlement separation, inappropriate quantum and parameters for development, sub-optimal location in terms of access to services, loss of BMVAL, impact on the setting of a listed building and conservation area, impact on the character of Arborfield Village, impact on the character of Green Route, countryside and Valued Landscape.
229. In light of the above and with due regard to all matters raised, the adverse impacts identified above are considered to significantly and demonstrably outweigh the benefits of the proposal when assessed against the policies in the Framework taken as a whole and with particular regard to had to key policies for directing development to sustainable locations, making effective

use of land, securing well-designed places and providing affordable homes. The application is therefore recommended for refusal for the following reasons:

- 1) The proposal represents inappropriate unplanned development outside of development limits within the countryside that is contrary to the spatial objectives of the development plan and to Policies CP1, CP3, CP6, CP9, CP11 and CP17 of the Core Strategy, Policies CC01, CC02, CC03 and TB21 of the MDD Local Plan, the Borough Design Guide SPD and sections 2, 4, 12 and 15 of the NPPF.
- 2) The proposed quantum of development within the parameters submitted for approval would result in a cramped and a poorly laid out scheme which has not been demonstrated to achieve minimum separation distances or adequate private amenity space. The road layout and parameters for development would result in development with streets that have poor passive surveillance and an access road that does not create a legible or integrated street network with the existing settlement pattern. The development is contrary to policies CP1, CP3 and CP11 of the Core Strategy, Policies CC01, CC02, CC03 and TB21 of the MDD Local Plan, the Borough Design Guide SPD, The National Design Guide and sections 8, 12 and 15 of the NPPF.
- 3) The proposed development will have a prominent negative and detrimental impact on the Bearwood and Barkham Valued Landscape, character of School Road (designated as a Green Route) and character & appearance of the area by reason of the loss of a sizeable section of open and attractive undulating landscape in the countryside with an urbanising large-scale development. Due to the location of the proposed access road, land form and quantum of development, the proposal would appear as detached from the village's main built-up core and fail to read as an organic extension to the settlement, thereby eroding its character, resulting in poor place-making. Therefore, the proposal would be contrary to policies CP1, CP3 and CP11 of the Core Strategy, Policies CC01, CC02, CC03 and TB21 of the MDD Local Plan, the Borough Design Guide SPD, National Design Guide, the Wokingham District Landscape Character Assessment, the Wokingham Borough Council Valued Landscape Assessment (2024) and sections 8, 9, 11, 12 and 15 of the NPPF.
- 4) The proposed development would significantly and prominently erode the open space that separates Arborfield Cross and Barkham Hill and Arborfield Cross and Arborfield, resulting in a detrimental degree of visual and perceived coalescence between these independent settlements, contrary to policies CP1, CP3 and CP11 of the Core

Strategy, Policies CC01, CC02, CC03 and TB21 of the MDD Local Plan, the Borough Design Guide SPD, the Wokingham District Landscape Character Assessment, the Wokingham Borough Council Valued Landscape Assessment (2024) and sections 12 and 15 of the NPPF.

- 5) The proposal would have a harmful impact on the setting of the Grade II listed building through the erosion of open fields which contribute to its rural setting. The proposed parameter plans would result in development which would not be reflective of both the historic roadside settlement and the existing pattern of development, thereby failing to preserve or enhance the character of the Arborfield Cross Conservation Area. The proposal would be contrary to Core Strategy policy CP3, MDD LP policy TB24 and sections 12 and 16 of the NPPF.
- 6) The agricultural land is classed as Grade 3 and the application fails to demonstrate there would be no loss of Grade 3a Best and Most Versatile Agricultural Land, or that such a loss would be outweighed by other material considerations, contrary to Core Strategy policy CP1 and section 15 of the NPPF.
- 7) By virtue of a lack of accurate and updated information a baseline survey date cannot be agreed and an assessment of how 10% biodiversity net gain will be achieved is not possible. As such, if granted planning permission, there is no guarantee that 10% biodiversity net gain would be achieved, hence would be contrary to Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021).
- 8) It has not been demonstrated that the proposal would not lead to harm to bat and reptile protected species and species of principal importance. The proposal is therefore contrary to policy CP7 of the Core Strategy, policy and TB23 of the MDD LP, Policy IRS3 of the Arborfield & Barkham Neighbourhood Plan and section 15 of the NPPF.
- 9) Insufficient information has been submitted with the planning application to enable the highways, parking and transportation implications of the proposed development to be fully assessed. This is due to the absence of an acceptable Transport Assessment. The applicant has failed to demonstrate that this major development would not have a significant adverse impact upon highway safety. This is contrary to Core Strategy policies CP1, CP3 and CP6, and sections 8 and 9 of the NPPF.
- 10) Insufficient information has been provided to demonstrate that the proposal would encourage a modal shift towards sustainable modes

of transport, by reason of the countryside location outside and unconnected to settlement limits, distances to facilities and services and poor quality of the walking/cycling environment, contrary to policies CP1, CP2, CP3, CP6 and CP11 of the Core Strategy, CC01 and CC02 of the MDD Local Plan, the Borough Design Guide SPD, National Design Guide and sections 8 and 9 of the NPPF.

- 11) Insufficient information has been provided to demonstrate that the proposed foul water drainage strategy would be viable, contrary to Core Strategy policies CP1, CP3 and policy CC10 of the MDD Local Plan.
- 12) Insufficient information has been provided to demonstrate how planning policies relating to sustainable construction and reductions in carbon dioxide emissions would be complied with, contrary to Core Strategy policy CP1, MDD LP Policies CC04 and CC05 and WBC Sustainable Design and Construction SPD.
- 13) 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 and section 15 of the NPPF
- 14) In the absence of a planning obligation, the proposal fails to secure opportunities for training, apprenticeships and other vocational initiatives to develop local employability skills contrary to MDD LP Policy TB12.
- 15) In the absence of a planning obligation, the scheme fails to make adequate provision for affordable housing, contrary to Policy CP5 of the Core Strategy and section 5 of the NPPF.
- 16) In the absence of a planning obligation the development fails to secure the management/adoption of internal estate roads or the installation of a pavement on the southern side of Barkham Ride, contrary to Core Strategy policy CP1, CP3, CP4 and CP6 and section 9 of the NPPF.
- 17) In the absence of a planning obligation to secure a travel plan or a contribution towards My Journey, a contribution towards the Arborfield Bus Strategy and a contribution towards improvements of public

transport infrastructure, the development fails to comply with policies CP1, CP3, CP4 and CP6 and sections 8 and 9 of the NPPF.

- 18) In the absence of a planning obligation to secure contribution towards healthcare, the development fails to comply with policy CP2 of the Core Strategy and section 8 of the NPPF.
- 19) In the absence of a planning obligation to secure delivery, ongoing maintenance, and monitoring of significant habitat creation and enhancement measures on-site, the proposal fails to comply with the biodiversity net gain mitigation hierarchy and is contrary to Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021), Core Strategy policy CP7, MDD LP policy TB23 and section 15 of the NPPF.
- 20) In the absence of a planning obligation to secure delivery and ongoing maintenance of Public Open Space, the proposal fails to comply with policy CP3 of the Core Strategy, policy TB08 of the MDD LP, National Design Guide and sections 8 and 12 of the NPPF.

RECOMMENDATION	
Conditions agreed:	Not required
Recommendation:	Refuse
Date:	19 December 2024
Earliest date for decision:	24 October 2024
Recommendation agreed by: (Authorised Officer)	<i>BJC</i>
Date:	20.12.24

The Conservation of Habitats and Species Regulations 2017 Screening Assessment and Appropriate Assessment

In the light of the “Sweetman Judgement” (People Over Wind and Sweetman v Coillte Teoranta, April 2018), the comments below comprise an Appropriate Assessment which includes advice on necessary avoidance and mitigation measures which is consistent with the advice provided to the Planning Inspectorate on such matters.

Summary of Response

WBC, in consultation with Natural England, has formed the view that any net increase in residential development between 400m and 5km straight-line distance from the Thames Basin Heath Special Protection Area (SPA) is likely to have a significant effect on the integrity of the SPA, either alone or in-combination with other plans or projects. An Appropriate Assessment has been carried out which includes regard to mitigation requirements.

This site is located approximately 4 km (measured from the access road to the application site) from the boundary of the SPA and therefore is likely to result in an adverse effect on the SPA, unless it is carried out together with appropriate avoidance and mitigation measures.

in line with the JSPB Delivery Framework, the applicant has proposed a he strategy for the development to consume capacity within an existing Suitable Alternative Natural Greenspace (SANG), the Ridge SANG, as an alternative recreational location to the SPA and financial contributions towards Strategic Access Management and Monitoring (SAMM) measures. Figures provided to the Council in October 2024 on behalf of the owner of the Ridge SANG indicate that there is currently insufficient unallocated capacity available within it. As such, it has not been presently established that the proposal would be able to adequately mitigate its impacts.

In this instance, the proposed development would result in a net increase of **up** to 95 dwellings within 5km of the SPA. The proposed development is required to make a contribution towards Strategic Access Management and Monitoring (SAMM) which would be calculated on a dwelling mix basis.

The applicant and SANG owner **must agree** to enter into a S106 agreement to secure the allocation of SANG capacity and the applicant **must agree** to enter into a S06 agreement to secure a SAMM financial contribution prior to occupation of each dwelling. Subject to the completion of the S106 agreement, the proposal would not lead to an adverse effect on the integrity of the SPA and would comply with SEP Saved Policy NRM6, policy CP8 of the Core Strategy, and the NPPF.

The absence of a S106 agreement securing adequate SANG and SAMM mitigation measures means that this proposal does not pass appropriate assessment and permission cannot be granted.

1. The Conservation of Habitats and Species Regulations (2017) as amended

In accordance with The Conservation of Habitats and Species Regulations (2017) as amended, Regulation 63, a competent authority (in this case Wokingham Borough Council (WBC)), before deciding to undertake, or give any consent, permission or other authorisation for, a plan or project which—

- a. is likely to have a significant effect on a European site...(either alone or in combination with other plans or projects), and
- b. is not directly connected with or necessary to the management of that site.

must make an appropriate assessment of the implications of the plan or project for that site in view of that site's conservation objectives.

A person applying for any such consent, permission or other authorisation must provide such information as WBC may reasonably require for the purposes of the assessment or to enable it to determine whether an appropriate assessment is required.

WBC must for the purposes of the assessment consult Natural England (NE) and have regard to any representations made by that body. It must also, if it considers it appropriate, take the opinion of the general public, and if it does so, it must take such steps for that purpose as it considers appropriate. In the light of the conclusions of the assessment, and subject to Regulation 64 (Considerations of overriding public interest), WBC may agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the European site.

In considering whether a plan or project will adversely affect the integrity of the site, WBC must have regard to the manner in which it is proposed to be carried out or to any conditions or restrictions subject to which it proposes that the consent, permission or other authorisation should be given.

2. Stage 1 Screening for Likely Significant Effects

WBC accepts that this proposal is a 'plan or project' which is not directly connected with or necessary to the management of a European Site. The Thames Basin Heaths Special Protection Area (SPA) is a European designated site which affects the borough, and WBC must ensure that development does not result in an adverse impact on the SPA. The potential adverse effects on the integrity of the SPA include recreational activities from inside the SPA and air pollution from inside and outside the SPA.

At this stage WBC cannot rule out 'likely significance effects' on the SPA (alone or in combination with other plans or projects) because the proposal could undermine the Conservation Objectives of these sites. This is because the proposal lies within **5 km** of the SPA and:

- represents a net increase in dwellings within 400m - 5km of the Thames Basin Heaths Special Protection Area (SPA) which will lead to an increase in local population and a potential increase in recreational activity on the SPA

As the 'likely significance effects' cannot be ruled out at this stage an Appropriate Assessment must be undertaken.

3. Stage 2 Appropriate Assessment

Based on the information proposed by the applicant, WBC must decide whether or not an adverse effect on site integrity (alone or in combination with other plans or projects) can be ruled out. Mitigation may be able to be provided so that the proposal is altered to avoid or reduce impacts.

The following policies and guidance set out WBC's approach to relevant avoidance and mitigation measures which have been agreed with Natural England. For the majority of housing developments this will comprise the provision of (or contribution towards) Suitable Alternative Natural Greenspace (SANG) and a contribution towards the Strategic Access Management and Monitoring (SAMM) Project. The financial contributions towards SANG would be either through an obligation in a s106 agreement, or through an obligation in an agreement under s111 of the Local Government Act, that requires the developer to make an appropriate financial contribution towards the provision of SANG. Developers will be required to secure an appropriate financial contribution to the SAMM project through an obligation in a s106 agreement.

For development within 5km of the SPA, SANG is required at a minimum of 8 ha per 1,000 new residents, constructed and delivered to Natural England's quality and quantity standards and a contribution towards pan SPA access management and monitoring (as advised by the Thames Basin Heaths Joint Strategic Partnership Board). For development between 5 and 7km, the proposals will need to be individually assessed but it is likely that SANG will be required on site in line with Natural England's quality and quantity standards, although the exact requirement will be agreed having regard to evidence supplied.

a. Policies and Guidance

For this proposal the following guidance and policies apply:

- South East Plan (May 2009) Policy NRM6 (Thames Basin Heaths Special Protection Area)
<http://webarchive.nationalarchives.gov.uk/20100528160926/http://www.gos.gov.uk/gos/planning/regionalPlanning/815640/>
- Wokingham Borough Core Strategy (2010) Policy CP8 (Thames Basin Heaths Special Protection Area) sets out the approach WBC will take in order to protect the TBH SPA <https://www.wokingham.gov.uk/sites/wokingham/files/2023-06/Final%20adopted%20Core%20Strategy%20inc.%20cover.pdf>
- Wokingham Borough Core Strategy (2010) Policy CP7 (Biodiversity) sets out the approach WBC will take in order to protect national and international nature conservation sites <https://www.wokingham.gov.uk/sites/wokingham/files/2023-06/Final%20adopted%20Core%20Strategy%20inc.%20cover.pdf>
- Wokingham Borough Managing Development Delivery Local Plan (2014) Policy TB23 (Biodiversity and Development)
<https://www.wokingham.gov.uk/sites/wokingham/files/2023-06/Adopted%20MDD.pdf>
- Infrastructure Delivery and Contributions SPD (2011)
<https://www.wokingham.gov.uk/sites/wokingham/files/2023-06/Adopted%20Infrastructure%20De~nd%20Contributions%20SPD.pdf>

The project as proposed would not adversely impact on the integrity of the SPA if avoidance and mitigation measures are provided as stipulated by these policies and guidance.

b. SPA Avoidance and Mitigation Measures

i) The provision of Suitable Alternative Natural Greenspace (SANG) and its ongoing maintenance in perpetuity.

In accordance with the development plan, the proposed development will be required to provide alternative land to attract new residents away from the SPA. The term given to this alternative land is Suitable Alternative Natural Greenspace (SANG).

As this development is not part of an SDL, the developer proposes to consume capacity within the existing Ridge SANG, owned and managed by the University of Reading. However, based on the information submitted so far, the Council cannot be certain that there is sufficient capacity available at the identified SANG allocated to this project. Without a mechanism to commit the University of Reading to allocate the capacity to this development, the Council cannot satisfy itself that this mitigation measure is secured.

ii. Strategic Access Management and Monitoring (SAMM) Contribution

The proposed development will also be required to make a contribution towards Strategic Access Management and Monitoring (SAMM). This project funds strategic visitor access management measures on the SPA to mitigate the effects of new development on it.

From 1st April 2024 SAMM contributions have been updated across the 11 Local Authorities affected by the Thames Basin Heaths Special Protection Area. Following engagement with Natural England, the Joint Strategic Partnership Board agreed this change is necessary to ensure sufficient income is raised to cover the costs of the SAMM project in perpetuity. Without this change the SAMM project would be at risk of being unable to deliver the objectives of the SAMM project, and therefore secure positive outcomes for the SPA

The level of contributions are calculated on a per bedroom basis. As the application is in an outline, it is not possible to calculate the precise amount of SAMM contribution required. Therefore, a planning obligation would need to include a calculation formula using the figures shown below, to allow the contribution to be calculated once the exact housing mix is known. The application for this development is for **X no X bedroom dwellings, X no X bedroom dwellings**. Depending on the dwelling mix, the level of SAMM payments are calculated as follows:

No. of bedrooms	SAMM Contribution 5km	Aggregate SAMM Contribution
1 bedroom	£563.00	
2 bedrooms	£784.00	
3 bedrooms	£1,042.00	
4 bedrooms	£1,225.00	
5+ bedrooms	£1,400.00	
Total SAMM Contribution		Unknown at this stage - would have to be determined at Reserved Matters

Prior to the permission being granted the applicant must enter into a Section 106 Agreement to secure the SAMM contribution, prior to occupation, at the above scheduled rates.

4. Conclusion

An Appropriate Assessment has been carried out for this development in accordance with the Habitats Regulations 2017. Without any appropriate avoidance and mitigation measures the Appropriate Assessment concludes that the development is likely to have a

significant effect upon the integrity of the SPA with the result that WBC would be required to refuse a planning application.

The applicant has proposed SANG and SAMM mitigation measures in line with the JSPB Delivery Framework in order to adequately mitigate an adverse effect via the recreational pathway on the integrity of the Thames Basin Heaths SPA.

WBC is not convinced that the SANG mitigation measure is viable and, in the absence of a Section 106 Agreement to secure both SANG and SAMM measures, the application must be refused using the following reason for refusal.

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.

Date:	19 December 2024	Signed:	<i>Joanna Carter</i>
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