



# ET Planning

## Planning Statement

### Brunningshams Farm

Heath Ride, Finchampstead, Wokingham, RG30 3QJ

*Erection of 7no. dwellings following demolition of existing buildings, with associated access, parking and landscaping*

Matthew Miller **BSc(Hons) MSc MRTPI**

---

[www.etplanning.co.uk](http://www.etplanning.co.uk)

CIL | Enforcement | Land Promotion | Planning | Sequential Tests | Viability

# Contents

<b>1. INTRODUCTION</b>	<b>1</b>
<b>2. SITE LOCATION AND DESCRIPTION</b>	<b>2</b>
<b>3. PLANNING HISTORY</b>	<b>4</b>
<b>4. DEVELOPMENT PROPOSALS</b>	<b>6</b>
<b>5. POLICY ASSESSMENT</b>	<b>10</b>
<b>6. CONCLUSION</b>	<b>39</b>

## List of Appendices

- Appendix 1: Appeal decision APP/H1705/W/25/3365525
- Appendix 2: Appeal decision APP/X0360/W/21/3288075
- Appendix 3: Appeal decision APP/X0360/X/24/3342812
- Appendix 4: Appeal decision APP/X0360/W/24/3350170
- Appendix 5: Appeal decision APP/X0360/W/25/3359928

## **1. Introduction**

- 1.1 This statement is produced to support a planning application for the erection of 7 dwellings with associated access from Heath Ride, with landscaping, internal access driveways and parking, alongside a soft landscaped (species rich grassland) area to the rear, along with retention of original woodland. This would follow the demolition of the existing buildings on site, and the closure of the existing western access point.
- 1.2 This planning statement will cover the background to the application and provide the necessary information to enable its determination by officers at the Council. It will consider the proposal in light of relevant planning policies and other material considerations. The conclusion reached is that key material considerations and the wider objectives of National and Local planning policy support the grant of permission.
- 1.3 In addition to this planning statement, the application is accompanied by the appropriate planning application forms and ownership certificate, duly signed and completed, technical reports, and plans.

## **2. Site Location and Description**

- 2.1 The site known as Brunninghams Farm comprises a rectangular parcel of land including the main property to the front (north) and an area of undeveloped land to the rear. The property contains a primary barn-style building with ancillary elements, including outbuildings and significant hardstanding underneath overgrown planting. The land is primarily laid to grass and an open central area, with various trees and planting throughout.
- 2.2 As per Section 3 below, the use of the land has been subject to various submissions. It is however understood that, notwithstanding the outcomes of those applications, the site continued to be used for light industrial use with an office, specifically as a car workshop. Under-investment by the previous owner has resulted in the built form on the site becoming somewhat dilapidated.
- 2.3 The site takes access from Heath Ride to the north, and is located in a predominately residential area, bounded by residential dwellings to the north, west and east. Further to the south beyond the woodland area are interspersed residential dwellings accessed from the B3348, with these communities known colloquially as The Ridges and Wick Hill.
- 2.4 The residential properties within Heath Ride, and the wider area, are characterised in the majority as large, detached dwellings, with variation in individual plot/garden sizes. Whilst there is a building line fronting the highway, there are also various instances of backland development contributing to the overall pattern of development.

- 2.5 Further analysis of the site's (and its surroundings) relation to the surrounding built form and modern extent of settlement are explored in Section 5 of the Statement.

### 3. Planning History

- 3.1 Application reference CLE/2006/0957 for 'Application for a certificate of lawful existing use for light industrial use and office space'. Refused & Appeal Dismissed, 04.09.2007
- 3.2 Application reference CLE/2006/7245 for 'Application for a certificate of lawful existing use for light industrial use and office space'. Refused, 25.05.2006.
- 3.3 Application reference CLE/2005/6567 for 'Application for certificate of existing lawful use for light industrial use with office space'. Withdrawn, 10.02.2006.
- 3.4 Application reference F/2005/4397 for 'Proposed erection of a porch and formation of hardstanding for storage racks. Retrospective'. Withdrawn, 10.02.2006.
- 3.5 Application reference 39066 for the 'Part conversion of Barn to Aquatic Centre'. Approved, 28.04.1992 (NB: details of this application are not listed on the Council's Planning Register).
- 3.6 Further commentary on the above is provided at paragraph 2.2 above. For the reasons presented in the Principle of Development sub-section of Section 5 of the Statement below, the previous use of the site in the context of whether it is previously developed land ('PDL') is not considered a salient factor in the overall consideration of the application.
- 3.7 A pre-application was submitted to the Council by the applicant, Council reference 243172 in 2024, to which a response was provided on 14 January 2025. The pre-application related to the proposed erection of 8no. detached dwellings with associated, parking and landscaping – the same quantum of development

proposed within this application, albeit of course with various alterations and additional information.

- 3.8 Matter raised by the Council within the pre-application are responded to within Section 5 of the Statement below.

## 4. Development Proposals

- 4.1 The National Design Guide (2019) identifies that “well-designed homes and buildings are functional, accessible and sustainable. They provide internal environments and associated external spaces that support the health and well-being of their users and all who experience them. They meet the needs of a diverse range of users, taking into account factors such as the ageing population and cultural differences. They are adequate in size, fit for purpose and are adaptable to the changing needs of their occupants over time” (para 120-121).
- 4.2 Regarding the requirements of NPPG Paragraph: 029 Reference ID: 14-029-20140306 in respect of Design and Access Statements, the proposal is described as follows:
- 4.3 **Use and Amount:** Residential development is sought in the volume of 7no. detached dwellings, each with dedicated private gardens, driveways and parking. This would follow the demolition of buildings on site.
- 4.4 To the rear of the proposed dwellings, a soft landscaped area is proposed for ecological use, including the formation of a pond.
- 4.5 **Layout and Scale:** The proposed dwellings would be laid out in approximate rectangular plots of broadly similar size, making use of organically curved boundary layouts to the access road in particular.
- 4.6 The development would comprise of three house types:
- 1no. Type 1, which would be 4 bedrooms
  - 4no. Type 2, which would be 5 bedrooms
  - 2no. Type 3, which would also be 5 bedrooms



- 4.7 Integral garages would be included with each dwelling type.
- 4.8 The development layout would follow a central access driveway, with dwellings on both side of this access. The access route would then terminate at the edge of the dedicated soft landscaped area to the rear.
- 4.9 **Appearance:** As above, the proposed dwellings would be detached and two storeys, containing projecting single storey elements.
- 4.10 The architectural style of the dwellings would follow an angular philosophy, highlighting a modernist design. Significant levels of glazing along with balconies are proposed in order to enable significant levels of natural light penetration.
- 4.11 The proposed materials would include facing brick alongside ash cladding and black natural slate tiles for the roof, including also anthracite coloured zinc flashings, fascias and gutters. Windows are to be aluminium double-glazed.
- 4.12 Each of the dwelling types would contain a green roof element.
- 4.13 **Landscaping:** Each dwelling would contain a generously-sized soft landscaped private garden, which would wrap around each dwelling to provide a continuous garden area, as compared to separate front and rear gardens, for example.
- 4.14 The soft landscaped area to the rear would contain areas of planting and trees (including retention of existing woodland area) as well as open grassed/lightly planted sections (i.e. species rich grassland), to provide a mix of habitats.
- 4.15 Existing planting would be retained where possible, including on the site frontage. Whilst some planting would be lost on the

frontage to provide the proposed access, additional planting would simultaneously be provided by the closure of the existing access.

- 4.16 **Access & Parking:** A new access point is proposed from Heath Ride, albeit this new point has been informally used in the past as evidenced by the boundary treatments. The current primary access would be closed and replaced with planting.
- 4.17 Each proposed dwelling would include a private driveway providing open air parking, in addition to integral garages.
- 4.18 The terminus of the driveway would provide maintenance access to the rear landscaped area, as well as a turning area for larger vehicles.



*Figure 1: The Proposed Development (source: Drawing 25050/PL/01)*

## 5. Policy Assessment

- 5.1 **National Guidance:** The National Planning Policy Framework (NPPF) is a relevant material consideration to the application.
- 5.2 The purpose of the planning system is to contribute to the achievement of sustainable development. So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development. Paragraph 39 of the NPPF states that “Local planning authorities should approach decision on proposed development in a positive and creative way” and “at every level should seek to approve applications for sustainable development where possible”. Paragraph 124 of the NPPF comments that planning should “promote an effective use of land” in “meeting the need for homes and other uses, whilst safeguarding and improving the environment and ensuring safe and healthy living conditions”.
- 5.3 Paragraph 61 confirms the Government’s objective to boost the supply of housing, and paragraph 8 identifies the three objectives of sustainable development, as economic, environmental and social.
- 5.4 Paragraph 131 identifies that “Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities”, whilst paragraph 139 states that significant weight should be given to “outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.”

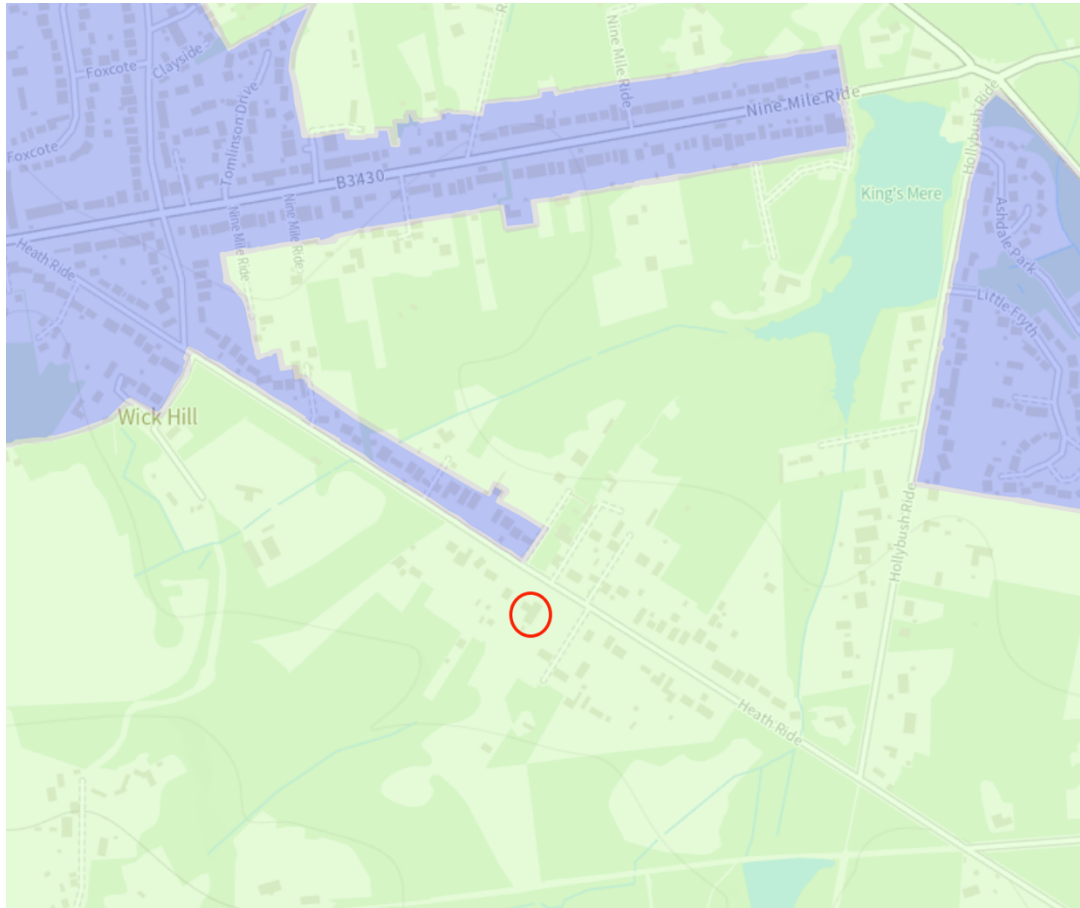
- 5.5 The National Design Guide builds on the above, and clarifies that “well-designed neighbourhoods need to include an integrated mix of tenures and housing types that reflect local housing need and market demand. They are designed to be inclusive and to meet the changing needs of people of different ages and abilities. New development reinforces existing places by enhancing local transport, facilities and community services, and maximising their potential use” (para 109).
- 5.6 **Principle of Development – Development Plan:** Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the Development Plan, unless material considerations indicate otherwise.
- 5.7 Wokingham Borough Council’s Development Plan includes the following:
- Wokingham Borough Local Development Framework Adopted Core Strategy (‘CS’) (adopted 29/01/2010);
  - Wokingham Borough Development Plan Adopted Managing Development Delivery Local Plan (‘MDD’) (adopted 21/02/2014), and
  - Policies Map
- 5.8 In addition, the Council is currently preparing its new Local Plan Update 2023 – 2040 (‘LPU’). This Draft Plan has passed Regulation 19 stage and is under formal examination, with Inspector public hearing sessions expected in November 2025.
- 5.9 As a consequence, some weight can be applied to the policies of the LPU, however the weight applied to individual policies will vary depending on their specific topic and contents, as set out in the case law of *Tewkesbury BC vs SSCLG [2013] EWHC 286 (Admin)*.

Under the current Development Plan the site is shown to lie within the countryside (as identified on the Policies Map), as illustrated in Figures 2 and 3 below (defined settlement being in blue). However an assessment concluding that the Council's current settlement boundaries are out-of-date follows within paragraph 5.20 onwards.



*Figure 2: extent of the defined settlement (Source: Online Planning Policies and Constraints Map)*





*Figure 3: wider view extent of the defined settlement, with application site highlighted in red (Source: Online Planning Policies and Constraints Map)*

- 5.10 **Principle of Development – Housing Supply:** Wokingham Council’s most recently published housing land supply (publication date 31 July 2025) was set out in a statement calculating the figure as of 31 March 2025, to be 2.5 years’ supply. This deficit is tantamount to a shortage of 3,495 dwellings over this period (including required 5% buffer).
- 5.11 It is also necessary to note that, prior to the publication of the Council’s latest housing land supply figure, the Council’s Housing Supply was calculated at only 1.7 years (a deficit tantamount to 4,359 dwellings including buffer). This limited increase highlights

that the housing supply shortfall is a long-term issue when following the overall trends involved.

5.12 Paragraph 11.d) of the NPPF sets out that where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, then permission shall be granted unless either:

*i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear 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.*

5.13 This is colloquially known as the 'tilted balance'. As the tilted balance has been engaged, the judgement of the Court of Appeal in *Gladman Developments Ltd v Secretary of State for Housing, Communities and Local Government* [2021] EWCA Civ 104 (03 February 2021) is highly relevant. The judgement sets out that in the exercise of planning judgement, the Council is under a duty to carry out a complete assessment, in which adverse impacts and benefits are to be fully weighted and considered, taking account of the Framework as a whole in addition to the relevant policies of the Development Plan.

5.14 Additional Planning case law, such as *Hallam Land Management Ltd v Secretary of State for Communities and Local Government* [2018] EWCA Civ 1808 (para. 47) ('Hallam') (CD5.16), has established that the extent of the housing shortfall has direct relevance to the degree of weight to be given within the tilted balance to the lack of housing supply in favour of granting permission. In this case, the shortfall is over half the supply



needed when including the required buffer (see paragraph 5.10), and therefore constitutes a serious and extensive shortfall.

- 5.15 Footnote 8 of the NPPF clarifies that the definition of out-of-date policies include those for applications involving the provision of housing where the Council cannot demonstrate a five year housing supply.
- 5.16 As a consequence of the Council failing to demonstrate a 5 years' supply of housing, the tilted balance is triggered within the assessment of this application.
- 5.17 Whilst the Council in its pre-application response accepts that the tilted balance is triggered within this development, it is noted that the Council considered the provision of 8no. dwellings to only a 'modest' contribution (with the application submission now involving 7no. dwellings).
- 5.18 However, further to paragraph 5.14 above, such a position rather underplays the seriousness of the shortfall, and is perhaps symptomatic of why the Council finds itself in such a position. By contrast, in a significant housing shortage even the supply of a single dwelling has importance, and this is highlighted by paragraph 12 in appeal decision APP/H1705/W/25/3365525 (Appendix 1). For appropriate context, this appeal involved the provision of a single dwelling in a Borough with a 4.2 year housing supply, therefore in a less serious position than Wokingham. Significant weight was nonetheless applied and it is considered that this is the proportionate and appropriate approach, drawing from the central government's mandate.
- 5.19 On 16 December 2025 a draft version of a new NPPF was issued for consultation. Whilst this carries only limited weight due to its consultation status, it is noteworthy in the context of the above

paragraphs that NPPF draft Policy H07 states substantial weight should be given to the benefits of providing accommodation to meeting evidenced need (i.e. Housing Supply shortfall). There is no quantum provided within this draft test, so even the provision of a single dwelling should be given substantial weight.

- 5.20 **Principle of Development – Countryside and Extent of Settlement Boundary:** With the housing supply position established, attention therefore returns to the Development Plan policies relevant to the proposal, including the weight to be applied to them.
- 5.21 MDD Policy CC01 aligns with the NPPF’s presumption in favour of sustainable development, noting the contents of paragraph 5.13 above in this matter.
- 5.22 CS Policy CP1 requires proposals to contribute positively to the character of the settlement and to meet identified housing needs. In doing so it does recognise the Council’s housing demands, however the policy itself is not explicitly a spatial development policy.
- 5.23 CS Policy CP3 sets out the general principles for development, requiring development to be within or adjacent to settlements, and to protect the separate identity of settlements. Whilst more of a design-led policy than a spatial one, weight would still be applied to the preference for housing to adhere to the above tests, however this would be opposed to such tests being able to be more strictly enforced.
- 5.24 MDD Policy CC02 seeks to impose development limits in the form of preventing new dwellings outside defined settlement boundaries, unless expressly supported by other policies. Given the imposition of these limits has resulted in a housing shortage,

this policy is considered out of date, and given the deficit in supply being half the requirement, it can be considered that significantly reduced weight be given to Policy CC02 as a consequence. This has implications in terms of the currently defined settlement boundaries of the Borough.

- 5.25 Reviewing Figures 2 and 3 above, it is noted that the majority of the built form along Heath Ride (along with Hollybush Ride to the east) is labelled as countryside within the Development Plan. This despite in actuality its suburban character and presence of numerous dwellings, with a distinct community feel and presence. While the area does have a verdant character, it cannot be said to be rural in the context of the density of dwellings and other built form. This therefore provides an explicit example of how Wokingham Council's settlement boundaries are considered to be out-of-date, with the current position being somewhat arbitrary and without logic or pattern, especially the rather abrupt ending of settlement along Heath Ride, which does not draw from any actual visual or physical cues.
- 5.26 Turning to the specific countryside policies, CS Policy CP11 seeks to restrict development unless it falls within a specified category. This is a very restrictive policy that seeks to elevate the protection of countryside by making development inappropriate by default unless for a limited list of exceptions, without any consideration to the site-specific impacts on the intrinsic character and landscape, which in turn defines the impact to the countryside.
- 5.27 This is explained by Policy CP11 being prepared pre-NPPF (first published in 2010), and therefore it required alignment with National Policy PPS7 at the time.

- 5.28 PPS7 sought to protect the countryside 'for its own sake'. The NPPF does not seek any such test or level of protection, and the Case Law of *Borough of Telford and Wrekin v Secretary of State for Communities and Local Government and ANOR [2016] EWHC 3073* confirmed that such a test is tantamount to a blanket protection of countryside which the NPPF does not seek, therefore resulting in such a test being wholly out-of-date its contradiction to current National Policy.
- 5.29 The current NPPF position on general development in the countryside is summarised in its paragraph 187.b), which sets out how planning policies and decisions should contribute to, and enhance, the natural and local environment by recognising the intrinsic character and beauty of the countryside.
- 5.30 NPPF paragraph 187.b) certainly does not remove all protection for the countryside, but it does impose a substantially different test to PPS7 (and by extension, CP11), which is one of assessing the site-specific characteristics of the individual development site and proposal, and whether the proposal would as a result impact upon the intrinsic character and beauty.
- 5.31 The Council accept in their pre-application response that Policy CP11 is out-of-date, and a potential matter that remains is the weight to be applied to it as a result. The below appeal decisions provide a consistent and clear answer to this question.
- 5.32 Appeal decision APP/X0360/W/21/3288075 (Appendix 2) provided one of the earliest answers to this debate, finding that the key test of CP11 in view of it being out-of-date for the above reasons, is the overarching stated objectives of whether the proposal would preserve the separate identity of settlements and

maintain the quality of the environment, as opposed to the application of the list of exceptions.

- 5.33 Appeal decision APP/X0360/X/24/3342812 (Appendix 3), permitted 23 dwellings et al. in a countryside location. The appeal decision at paragraph 8 onwards concluded that despite none of the circumstances of Policy CP11 applying to the appeal proposal, the overarching aim of the Policy was nonetheless fulfilled by the proposal.
- 5.34 Appendix 3 also went on to note that consideration and assessment of individual sites are required to be undertaken beyond a rigid adherence to what can sometimes be arbitrarily-drawn boundaries for what defines a settlement (see Appendix 2 paragraphs 12 & 13). This aligns with the matters set out in paragraph 5.25 above about the Council's settlement boundaries not being an appropriate measure in themselves to define whether residential development would be acceptable.
- 5.35 Appeal decision APP/X0360/W/24/3350170 (Appendix 4), whilst relating to 240 dwellings and being outline, is of relevance in terms of overarching approach to the suitability for locating new residential development. It is noted that a key matter of consideration and of common ground was not so much the overall principle of development being in countryside, but of the more nuanced considerations of whether the site was in a sustainable location and whether it preserved the separation between settlements. This aligns with the matters and approach presented throughout this submission.
- 5.36 Paragraphs 61 and 62 of Appendix 4 also reinforce the fact that, whilst previous oversupply of housing is a material consideration, it is reasonable and appropriate to give this consideration lesser

weight compared to the immediate housing needs established in the formal Housing Supply position.

- 5.37 To avoid any unintended bias, appeal decision APP/X0360/W/25/3359928 (Appendix 5) provides an example of a dismissed appeal relating to housing in the countryside of Wokingham Borough – 49 dwellings. However the reasons for the dismissal related to the site being considered unsustainably located and within a valued landscape, as opposed to it being an unacceptable form of development in the countryside as a principle of development matter. This dismissed appeal therefore maintains consistency with the overall approach that has been described above. This development site, by contrast, is not considered to lie within a valued landscape, and is considered to be appropriately sustainable.
- 5.38 Returning to CS Policy CP11, the proposed development would not fit neatly into one of the list of stated exceptions (irrespective of whether it is considered PDL or not), however as per the above approach this has minimal relevance in terms of the weight and correct approach. The proposal would however preserve the separate identity of settlements and maintain the quality of the environment, for the reasons stated in the 'Character and Appearance of the Area' sub-section below. In doing so, the proposal would accord with the relevant sections of CP11 to be given weight, as well as the NPPF (see paragraph 5.32).
- 5.39 Attention is also given to the emerging policies of the LPU, noting paragraph 5.9 above. In broad terms, the LPU seeks to continue to define development limits around existing settlements, acknowledging that modest extensions to existing settlements can contribute to housing delivery where they relate well to the urban edge, and can be delivered sustainably. Whether this

approach would ensure the Borough's housing supply could be met is a matter that remains open to examination, however nonetheless the proposal would align with the approach of a modest extension to the existing settlement.

- 5.40 Furthermore, as also noted at paragraph 5.29, a draft consultation of a new NPPF has been published. While it carries limited weight at present, it nonetheless provides details of central government's intention. Relevant to countryside development is draft NPPF Policy S05, which would enable development addressing an identified need (housing supply shortfall) where it relates well to an existing settlement, and where it can be accommodated by existing infrastructure. Both these factors have been examined throughout this Planning Statement.
- 5.41 **Principle of Development – Summary:** The Council has a serious deficit in its Housing Supply and there are multiple examples of residential development being permitted in countryside locations provided that they primarily preserve the separate identity of settlements and maintain the quality of the environment, as well as being reasonably sustainably located. For reasons presented in the Statement below, these two tests are considered met.
- 5.42 In the context of the tilted balance being engaged, the Council's spatial and countryside policies have been established to be out-of-date, and this accordingly has implications on the Borough's currently drawn settlement boundaries and the relevance that can be given to them.
- 5.43 As the proposal would meet the approach described above it is considered acceptable in principle. Matters including impact on

the character of the area, the sustainability of the location, and other technical matters including transport, ecology, etc. are reviewed below.

- 5.44 **Locational Sustainability:** CS Policy CP9 seeks to focus development within defined settlements appropriate to their scale and role. It sets out settlement hierarchies to enable the application of this policy.
- 5.45 Whilst Policy CP9 relates to the supply of housing in the context of whether the policy is out-of-date, it does maintain consistency with the NPPF in terms of directing development to sustainable locations.
- 5.46 As visualised in Figures 2 and 3 above, the site lies in immediate vicinity to a modest development location. The Council's pre-application response also explicitly refers to the proposal as being 'modest'. The labelling of a modest development location is also considered to be middle of the range between 'major' and 'limited' within CP9 so in this context can be considered to encompass this quantum of development. It is accordingly unclear how the Council consider the area marked in blue within the above Figures to be sufficiently sustainable to accommodate additional residential development, but that suddenly past this arbitrary line development is not sustainable to the extent it should be refused. Clearly this is not a black and white exercise.
- 5.47 The site would be considered sustainable for a proportionate residential development in the same manner as how the Council came to conclude the adjacent land is sustainable in Policy CP9, as the difference in distance is not significant.
- 5.48 The application site's entrance is set within an approximate 15 minute walk to various amenities within Finchampstead, which



include both Co-Op and Londis convenience stores, pharmacy, dentist, primary school, day nursery and pre-school, community centre, hairdresser, restaurants & café, and takeaways. Bus stops are provided along Nine Mile Ride providing access to multiple routes (the 125, 125a and 125b services), including direct routes to both Wokingham and Crowthorne centres, and operating every weekday and Saturdays day with regular services.

- 5.49 Whilst Heath Ride does not contain dedicated pavements, the proposed increase in quantum of development is to be considered in the context of the significant number of existing residential properties and the according additional intensity and impact. In this context, it is not considered that this is a preventative factor.
- 5.50 A Transport Statement is provided with the submission, which also provided detailed commentary on the locational sustainability merits of the proposal. A key highlight of this Transport Statement is to set out the planning test in terms of NPPF paragraph 110 (reducing reliance on the private car) is certainly not to remove the reasonable use of a private car entirely. Rather, it is a test that requires a degree of flexibility and pragmatism. The above described vicinity to local services and public transport therefore evidence there is a realistic choice of how prospective residents can journey to facilities without complete reliance on the private car (see Transport Statement paragraph 3.14).
- 5.51 The Transport Statement also includes reference to appeal APP/X0360/W/24/3350050, provided as Appendix 1 of that Statement. This allowed appeal involved a site opposite to that proposed within this application. Paragraph 3.7 onwards of the Transport Statement sets out the Inspector's findings in favour of the locational sustainability of that site, including the modest speeds and quietness of the road, as well as the distance to local

facilities not being 'overly prohibitive'. The Inspector in conclusion found that journeys would be possible on both foot and by cycle. The Inspector further found that the aforementioned bus service was at minimum, adequate to serve prospective residents.

- 5.52 Whilst of course every development site is to be considered on its own merits, the fact that APP/X0360/W/24/3350050 is a very recent appeal decision and also involves a site essentially identical in overall location, requires a consistent approach to be undertaken.
- 5.53 **Dwelling Mix:** The proposal would provide executive housing, in the manner of larger detached four and five bedroom dwellings.
- 5.54 Given the Council's Housing Supply position, policies seeking a specific housing mix would be out-of-date, and likewise, with a deficit of half the required supply, it is reasonable to suggest that there is a demand for all types of housing.
- 5.55 Accordingly, and when considering the type and character of the surrounding housing, the proposed dwelling mix is considered appropriate to this location. This also draws from the overlapping character consideration in terms of the proposal offering a similar type of dwellings to those present in the surroundings – highlighting such a demand in this specific location.
- 5.56 A Density Analysis has been submitted with the application. This document demonstrates that the sizes of the proposed plots would be larger than the average plot size within the surroundings. This, combined with the reduction of a dwelling from the pre-application discussion, is considered to address density concerns raised by the Council.

- 5.57 **Character and Appearance of the Area, including the countryside setting:** In addition to Policy CP11 as already explored extensively in this Statement, CS Policy CP3 expects proposals to be appropriate in elements including scale, form and character to their surroundings, as well as to protect landscape features, and to avoid overdevelopment of the site.
- 5.58 MDD Policy TB21 seeks for development to be informed by, and to respect, the Borough's defined landscape character areas (noting that the entire Borough is subject to these character areas, as opposed to them being valued landscapes).
- 5.59 It is noted that the LPU seeks to impose extensive 'valued landscapes' to the Borough on essentially every area of developed land, including land that is residential garden. As per Appendix 5, it is somewhat premature to impose notable weight to this, and instead a site-specific assessment remains the appropriate test.
- 5.60 The site comprises a relatively flat topography, and although there are buildings present, with their most recent lawful use being agricultural, they are not necessarily considered previously developed land. However this is largely considered immaterial given that the site is bound on three sides by residential development, which extends across the duration of Heath Ride.
- 5.61 Views into the site are limited by planting, especially the densely planted frontage, which would be preserved including through replacing formal and informal access points with a single access. As per Figure 4, residential development extends rearwards in a similar fashion to the proposal on both sides of the application site, and therefore is clearly not focused solely on the highway frontage – with various other examples present beyond what is visible in this Figure.



*Figure 4: Google Maps imagery of existing site in context of residential surroundings, including built pattern of development*

- 5.62 In terms of identifying elements of landscape value present on site, the starting point is to consider the wider character area as noted in Policy TB21. The site lies within the 'Finchampstead Forested and Settled Sands' area. Key aspects of this landscape include a gently undulating landform of sandy and acidic soils supporting extensive tree cover. In connection with this, the area has a well-wooded and allegedly semi-rural character interspersed with small settlements (which cannot be said of the application site or of Finchampstead, so is somewhat inaccurate in its breadth of coverage), with a settlement pattern typically linear or nucleated.
- 5.63 Accordingly the value of the site is considered to be the wooded backdrop, both in terms of the verdant character of Heath Ride itself, but also the wider woodland to the rear. These would both be preserved by the proposal with the submitted Site Plan highlighting sections of retained woodland in particular.

- 5.64 The character area's key sensitivities are considered to be the erosion of its wooded character through 'inappropriate' suburbanisation, loss of mature vegetation or excessive built form disrupting the settlement edges.
- 5.65 Looking at these matters in turn, considering the density of development already present in this area the site can only be said to be suburban in nature, and accordingly the proposal would not be 'suburbanising' in this wider built form context (see Figure 4). The proposal would retain significant elements of mature vegetation especially on the site frontage and boundaries where it is most visible and therefore most characteristic, whilst being supplemented by additional soft landscaping. Lastly, the 'settlement edge' as denoted in Figures 2 and 3 has already been, in the Council's wording, disrupted by the existing built form, to the point that as the existing situation the settlement boundary follows no pattern and is entirely arbitrary.
- 5.66 Within the submitted pre-application, the Council provided commentary concerning the visual impacts of the perceived density of the proposal, in the context of the surrounding area.
- 5.67 Further to paragraph 5.56 above, the proposed erection of 7 dwellings whilst leaving the rear of the site undeveloped (including the provision of distinct soft landscaped habitats) would provide an overall density of housing consistent with the surroundings, and would be a wholly proportionate level of development to the size of the site. The use of a meandering access driveway along with curved individual plot boundaries would support an organic feel to the proposal, thereby minimising its urbanising effect, as well as any visual impact of the perceived density. This would in turn avoid the appearance of a centralised cul-de-sac access or a uniform layout which would be inconsistent

with local character. This would also be complemented by the three different dwelling types which would also vary in their orientation.

- 5.68 The architectural philosophy is one of seeking a bespoke, innovative design. This has the aims of avoiding an urbanising effect whilst promoting the significant design variation along Heath Ride, and ensuring overall design interest. The use of green roofs in addition to generous garden sizes and the frontage screening all contribute to the verdant feel of the existing character.
- 5.69 The built form of the proposed rearmost dwellings would not extend southwards beyond the rear of the neighbouring dwelling of Hill Top, as well as the substantial buildings associated with Hawthorns and Brock House. Consequently, the proposal would preserve the separation between the built form of Finchampstead and The Ridges & Wick Hill to the south, thereby meeting the relevant tests of Policy CP11.
- 5.70 To conclude this sub-section, the proposal would accord with the relevant requirements of CS Policy CP11 through preserving the separation between settlements and not resulting in any environmental harm. It would meet MDD Policy TB21 and NPPF paragraph 187.b) through not resulting in any harmful impact upon the intrinsic character and beauty of the countryside, including elements that contribute to this beauty. It would accord with CS Policy CP3 through providing an appropriate scale, quantum and form of development to this location.
- 5.71 **Heritage, Trees and Landscaping:** In terms of Heritage considerations, there are no designated heritage assets (i.e. Listed Buildings or Conservation Areas) located either on, or



within the vicinity of, the application site. The surrounding buildings are predominately post-1945 dwellinghouses, with examples of modern architecture present along the entirety of Heath Ride.

- 5.72 A Tree Survey, Method Statement and Protection Plan have been submitted with this application.
- 5.73 The above documents demonstrate that trees will only be removed where required. In terms of the site frontage, trees will be removed to accommodate the proposed access, but this is mitigated with the closure and replanting of the existing access. Planting on the primary public vantage points – the boundaries of the site – would be largely retained, and enhanced.
- 5.74 The measures such as the aforementioned tree retention, as well as provision of green buffers and the design rationale of limiting building ridge heights, would all serve to ensure the wider rural setting located to the south of the development site would not be adversely impacted, including in the context of the extent of proposed built form described in 5.58 and shown in Figure 4, above.
- 5.75 As noted in paragraph 5.68, the use of features including green roofs and generous private gardens would maintain a significant level of verdant and green character to the site, and this of course would be supplemented by the undeveloped land to the rear (save for the proposed landscaped pond, which itself would be a sympathetic landscape feature despite technically being development).
- 5.76 It is agreeable that a full soft landscaping plan, including full details of the proposed gardens landscaping, etc. be secured by planning condition.

- 5.77 **Residential Amenity – Prospective Occupants:** The proposed dwellings would offer a high standard of amenity to their prospective occupants, which is a material consideration. The use of significant amongst of glazing would ensure substantial natural lighting is received to the interior, and generous garden sizes would provide favourable private amenity. The proposed dwellings would also contain private balcony areas.
- 5.78 In terms of potential impacts between the prospective occupants, the balconies and overall dwelling orientations are designed in such a way to prevent any adverse overlooking or loss of privacy impacts, and this is in combination with the proposed separation distances.
- 5.79 **Residential Amenity: Neighbouring Occupants:** As with the above, the proposal has been designed to avoid any impacts to the neighbouring properties, especially those flanking the proposed development, through careful placement and orientation, which also includes in terms of preventing any adverse loss of light or overbearing impacts.
- 5.80 **Transport and Parking:** The proposed access point would formalise an existing informal access point, through widening and the laying of hardstanding. As part of this, the existing access point on the western side of the site frontage would be closed and replanted. The proposed access point would meet the required visibility splays and swept paths for access onto Heath Ride, as demonstrated within the submitted Transport Statement.
- 5.81 The internal access route would contain a turning area towards the rear of the site, to enable large vehicles to access and egress the site in forward gear. This would be to the benefit of vehicles



including emergency and refuse vehicles. This would enable refuse vehicles to collect from each individual dwelling.

- 5.82 Each dwelling would contain a minimum of four dedicated parking spaces, two (at minimum) provided in the driveway and two within the integral garages. The supporting driveways would also be of sufficient size to enable standard-sized vehicles to access and egress individual plots in forward gear.
- 5.83 Details of separate cycle storage and EV charging points are agreeable to be secured by planning condition.
- 5.84 Access is provided to the rear landscaped for long-term maintenance purposes. A turning area is also provided at the terminus of the access road for larger vehicles.
- 5.85 In terms of Heath Ride itself, it is acknowledged that this is a narrow highway, and does not have pavements, with the matter regarding pedestrians already explored in paragraph 5.49 & 5.51 above. The speed of vehicles utilising Heath Ride is however accordingly low, and the provision of 7no. additional dwellings in the context of the number of existing dwellings this highway serves is not considered to result in any increased harmful impact when considering the total net increase in movements over a typical day versus existing.
- 5.86 **Drainage and SuDS:** The site is located in Flood Zone One, the lowest risk of flooding. In view of the size of the application site a Flood Risk Assessment ('FRA') is submitted with the application.
- 5.87 The FRA identifies that the site has limited pockets subject to high and medium risk of surface water flooding. The FRA accordingly goes on to provide a Drainage Statement including SuDS measures which provide mitigation against the surface water

flooding risk, as well as proportionate general measures for the proposed development.

- 5.88 For the SuDS measures, the Drainage Statement applies the Sustainable Drainage Hierarchy (paragraph 8.2.2 onwards of the document). Under the Hierarchy the storage of rainwater and use of infiltration techniques are discounted, and therefore it is proposed to discharge to the watercourse. This would be achieved through the use of permeable paving for both the access road and driveways, taking runoff from the roofs and hardstanding. The discharge has been calculated to meet greenfield levels through the method proposed.
- 5.89 In the event of blockage or extreme weather events that overwhelms the system, the natural topography of the site would move surface water away from the proposed dwellings.
- 5.90 The FRA also provides a detailed strategy for minimising pollution risk from surface water as well as a maintenance strategy for the lifetime for the development. It details that foul drainage from the proposal would be treated on site via a package treatment plant in each property before discharging to the existing network located at the front of the site, with an environmental permit sought.
- 5.91 Updated National Planning Policy Guidance ('PPG') issued on 17 September 2025 regarding Flooding Sequential Tests confirms that this site is not required to demonstrate whether the Sequential Test has been passed.
- 5.92 Accordingly, the submitted information demonstrates that the proposal would not increase the risk of flooding, either within the site or to the surroundings, and can accommodate the anticipated level of discharge of foul and surface runoff from the proposal.

- 5.93 **Ecology:** Extensive supporting Ecological information has been submitted in support of the application, highlighting a clear desire to minimise ecological harm and enhance ecological value on the application site as a whole.
- 5.94 Starting with the Preliminary Ecological Appraisal and Roost Assessment ('PEA'), this document concluded that in view of the vacancy of use of the site the site has significant existing ecological potential.
- 5.95 Accordingly in terms of Phase 2 works, surveys to assess reptiles and botany have been submitted. Badgers were also identified as a potential habitat – with badger surveys only being valid for 3 months this will be completed at the request of the Council in terms of preferred timing. Details have also been provided in terms of not requiring a newt survey to be undertaken.
- 5.96 The site has been identified as containing Japanese Knot Weed. A detailed report setting out its removal has accordingly been submitted for consideration.
- 5.97 The above documents provide a strategy for mitigation regarding any potential presence of protected species. Therefore turning to ecological enhancements, in addition to generalised enhancement measures proposed a biodiversity net gain ('BNG') study has been provided, as detailed below.
- 5.98 The BNG documentation, including metric, confirms the site's baseline. The site has a baseline habitat value of 15.91 units, and an additional baseline watercourse-based habitat value of 2.38 units.
- 5.99 Table 2 of the submitted Biodiversity Net Gain Assessment document highlights measures by which a minimum 10% gain

could be achieved, and this includes the retention of areas of existing habitats, the enhancement of wet woodland and neutral grassland, the creation of native mixed scrub and other general tree planting and native grassland, as well as the removal of existing bracken areas and aforementioned Japanese Knot Wood. Furthermore, in terms of the watercourse-based habitats, the enhancement of the ditches would serve to provide a net gain.

- 5.100 Turning to the calculation of the Biodiversity Net Gain metric as a result of the proposal, the results demonstrate a +6.72% gain, requiring 2.13 biodiversity units to achieve the minimum net gain and satisfy the woodland trading rules. The document presents that for the remainder, 0.8 hectares of off-site woodland could be enhanced, subject to assessment. Should this area be found unsuitable for enhancement, or if enhancement is not feasible, third-party biodiversity units would be secured instead. It is presented that this can be reviewed and discussed during the application process.
- 5.101 As a consequence it has been demonstrated that the proposal can meet the mandatory BNG requirements.
- 5.102 **Sustainability and Energy:** Paragraph 8 of the NPPF supports the transition of development to a low carbon future. The national Code for Sustainable Homes has now been abolished, however it is proposed that the development would conform to Part L of the Building Regulations which as of 2022 requires a 30% reduction than current standards. By way of contributing to the reduction in carbon, the proposal would also achieve current building construction standards with added sustainability measures through;

- A. The limitation of the amount of inherent material, structure and embodied energy through the employment of good building standards to create an excellent SAP rating;
- B. Use of locally sourced, recycled materials and labour where practicable;
- C. The use of green roofs;
- D. Reduced internal water consumption of 110 litres per person per day through the incorporation of water efficient sanitary fittings, including low flow toilets and water efficient taps for wash basins;
- E. Refuse, recycling and composting facilities to be provided to work with the Council's existing waste and recycling collection service;
- F. Secure cycle provision to encourage sustainable modes of transport;
- G. 'A' rated electrical appliances and energy saving light fittings;
- H. 'A' rated double glazed windows with natural cross ventilation provision;
- I. Water butts fitted to the rainwater down pipes for watering the garden;
- J. Recycling of waste construction materials where practicable;
- K. Permeable driveway/parking spaces to avoid increase in surface water runoff;

5.103 The proposal is therefore considered to comply with sustainability objectives in this respect.

- 5.104 MDD Policy CC04 states that developments shall be of high quality through sustainable design and thorough construction standards. As part of this, it sets out that new dwellings will be expected to meet the full Code for Sustainable Homes and efficient water use.
- 5.105 The development is to utilise a 'fabric first' approach – maximising the performance of the components and materials that make up the building fabric itself for energy efficiency, before then turning to installing renewable energy systems. This involves factors such as a high efficiency of insulation and air tightness.
- 5.106 These fabric first principles will be supported by elements including EV charging points, green roofs, and the anticipated use of either air-source heat pumps or solar panels. It is agreeable that further details of the above can be subject to a planning condition.
- 5.107 **Contamination & Archaeology:** The site is not known to be contaminated or to have archaeological value, and this was also confirmed in the pre-application response.
- 5.108 **Special Protection Area:** The site lies within the 400 metres to 5 kilometres buffer zone of the Thames Basin Heaths Special Protection Area ('TBH SPA'). As the proposal involves a net increase in 7no. dwellings, SPA mitigation in the form of the provision of Suitable Alternative Natural Greenspace ('SANG') and a monetary contribution towards Strategic Access Management and Monitoring ('SAMM') are to be discussed with the Council in terms of the extent required. It is recognised that private SANG may be required in this instance.
- 5.109 **Affordable Housing:** CS Policy CP5 seeks for the provision of 35% of dwellings to be provided as affordable housing on developments involving a net increase of five or more dwellings.

5.110 Details of this provision are to be discussed within the application stage.

5.111 **Development Phasing:** Whilst not confirmed at the time of writing, there is the potential option for the development to be phased. Again, whilst the specific manner of this phasing is yet to be fully confirmed, a likely option would be to deliver the scheme in nine phases – the initial site preparation including demolition, access, non-plot landscaping works and infrastructure works, and then individual phases for each dwelling.

5.112 If pursued, this phasing process would offer various benefits, and this would include (but not be limited to):

- Effective construction traffic management, including through the limitation of the traffic intensity. This in turn would provide a limitation to site activity, thereby minimising disruption to neighbouring residents, in terms of traffic, noise and any other pollution.
- Enable early implementation of environmental protection measures, including the amenity landscaping, ecology mitigation and enhancement (i.e. biodiversity net gain), and drainage measures.
- A high level of quality assurance and quality control to the development, including ensuring each individual dwelling and its associated plot are built to a high level of quality and consistency.
- The ability to detect and address any unforeseen constraints in a timely manner.

- 5.113 **Community Infrastructure Levy:** The proposal is CIL liable through the proposed floorspace of the residential use. The relevant CIL forms have been provided.



## 6. Conclusion

- 6.1 Planning permission is sought for the erection of 7no. dwellings following the demolition of buildings on site. The application site is technically located in countryside, however this Statement has presented in detail why this should not be a barrier to development, under the particular site and Council circumstances.
- 6.2 As demonstrated within this Planning Statement, and the Design and Access Statement which also accompanies this application, the proposed development provides a sustainable development which sensitively responds to the surrounding context of the site. It would form a proportionate level of residential development within what is already an established residential area which has been previously concluded as a sustainable location.
- 6.3 The Council is unable to demonstrate a five year supply of housing – the minimum level of housing required. The deficit in supply is half of the total requirement, which highlights serious and substantial shortage. As part of the tilted balance exercise, the Council's Development Plan Policies in respect of settlement boundaries and countryside development are out of date, and this is an established position as per various determined applications/appeals of this nature within the Borough.
- 6.4 The range of studies that have been undertaken to support this planning application are all summarised in this Statement. These demonstrate that a high-quality development will be achieved at the Site, and that there are no environmental, technical or other reasons why planning permission should not be granted in this case.

- 6.5 Under the tilted balance, the adverse impacts of a development must significantly and demonstrably outweigh the benefits. The above Statement evidences that that any adverse impacts are significantly limited, in terms of highly localised impacts. However as a theoretical exercise even if they were substantial, the above weighting exercise is required to be applied in terms of the tilted balance..
- 6.6 The benefits of the proposal are both clear and substantial. The provision of 7no. dwellings is a significant factor in the context of the substantial housing shortage. It represents a significant scale for a windfall site, the type of which the Local Authority is reliant upon to meet its housing deficit. This is then supported by the various social and economic benefits brought about by housing development, as per Appendix 1, i.e. the boost to the local economy, construction, and the long-term benefits of providing people with a place to live, work and thrive. Given the site-specific context of the surrounding residential development, including its built pattern of development and overall density, as well as the sustainability of the location (as already evidenced in similar applications within this location), this is a textbook example of a windfall site.
- 6.7 It is also noted that the contents of the draft NPPF, currently subject to consultation, would weigh in favour of the proposal, signalling central government intention to the Planning system.
- 6.8 It is considered that the proposed scheme complies with relevant Development Plan Policies that remain in date (noting the appropriate, established and therefore non-controversial approach to the out-of-date policies). It is further supported by National Guidance, including the government's overall instruction for increased housebuilding.

6.9 Therefore, it is respectfully requested that planning permission is granted.

**Matthew Miller BSc (Hons) MSc MRTPI**

Associate Director | ET Planning

200 Dukes Ride Crowthorne RG45 6DS

[matthew.miller@etplanning.co.uk](mailto:matthew.miller@etplanning.co.uk) 01344 508048



| CIL  
| Enforcement  
| Land Promotion  
| Planning  
| Sequential Tests

## Contact

### Address

200 Dukes Ride RG45 6DS

### Phone

01344 508048  
01865 507265  
01483 363950  
01743 612043  
01392 691384

### Web & Mail

Email: [office@etplanning.co.uk](mailto:office@etplanning.co.uk)  
ET Planning Ltd | 10646740

Web: [www.etplanning.co.uk](http://www.etplanning.co.uk)