
Planning (and Affordable Housing) Statement

**LAND NORTH OF READING ROAD,
ARBORFIELD**

OUTLINE PLANNING APPLICATION

FOR

**UP TO 111 DWELLINGS, WITH ASSOCIATED
WORKS, PARKING, LANDSCAPING AND
PUBLICLY ACCESSIBLE OPEN SPACE, WITH
ACCESS FROM READING ROAD**

Prepared by:

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On behalf of:

Dandara Southern Ltd & Elstree Land Ltd

 **dandara**



ELSTREE LAND

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Contents

1. INTRODUCTION.....2

2. DESCRIPTION OF THE SITE AND SURROUNDING AREA 10

3. DESCRIPTION OF THE PROPOSED SCHEME 13

4. SUMMARY OF SUPPORTING MATERIAL..... 20

5. PLANNING POLICY FRAMEWORK AND MATERIAL CONSIDERATIONS..... 29

6. ASSESSING THE ACCEPTABILITY OF THE APPLICATION SCHEME..... 74

7. SUMMARY AND CONCLUSION 85

1. INTRODUCTION

General

- 1.1. This Statement has been prepared by Woolf Bond Planning LLP in support of an **outline planning application** by Dandara Southern Ltd and Elstree Land Ltd on land North of Reading Road, Arborfield, **for up to 111 dwellings**, associated landscaping and open space with access from Reading Road.
- 1.2. The application is submitted in outline with only the principle of the proposed land uses and the means of access to be determined.
- 1.3. Appearance, landscaping, layout and scale are reserved matters, to be further developed at detailed design stage should outline permission be granted in the terms sought.
- 1.4. The purpose of this Planning Statement is to provide an overview of the proposed scheme, summarise the findings of the various supporting technical documents (section 4 refers) and set out the justification for the development having regard to the relevant planning policy and material considerations.
- 1.5. The Application Site is shown edged red on the accompanying Site Location Plan No. 052403-DAN-LOC01 and extends to approximately 6.44ha.
- 1.6. Details of the proposed development are shown on Illustrative Masterplan No. 052403-DAN-MP01.
- 1.7. This Planning Statement carries out an assessment of the Application Scheme against Section 38(6) of the Planning and Compulsory Purchase Act 2004 (PCPA 2004), which sets out a requirement for planning applications to be determined in accordance with the development plan unless other material considerations indicate otherwise.
- 1.8. The Application Site is located outside, but is in close proximity to, the defined settlement boundary of Arborfield Cross.
- 1.9. The Site is not located in a Conservation Area and no listed buildings are located within the application site.

- 1.10. For the reasons set out in this Statement, the Scheme satisfies the economic, social and environmental roles of the NPPF and represents a sustainable form of development.

Planning Policy Context

- 1.11. For the purposes of s38(6) PCPA 2004, the existing Development Plan for Wokingham, in so far as it relates to the determination of this Application, comprises as follows:

- Wokingham Core Strategy (adopted January 2010);
- Managing Development Delivery Local Plan (adopted February 2014) and
- Arborfield & Barkham Neighbourhood Plan (Made April 2020).

- 1.12. The Wokingham Core Strategy (“CS”) was adopted in January 2010 and set out the overarching strategy in seeking to meet development needs in the period 2010 to 2026. At the present time, therefore, Wokingham is in the final 2 years of delivery of the strategy which was developed and adopted over 14 years ago.

- 1.13. Policy CP17 of the Core Strategy requires a minimum of 13,230 net additional dwellings to be provided during the plan period (2006 to 2026), equivalent to 662dpa. This compares to the 748dpa derived from the application of the current Standard Method (“SM”) (identified in section 5) and the 1,308dpa derived from the proposed SM in the consultation draft NPPF.

- 1.14. The development plan (comprising the above three documents) is out of date in terms of the spatial application of its housing policies. This is not to say all policies therein must be discounted as paragraph 225 of the NPPF makes clear that policies adopted prior to the publication of the NPPF may be given weight based upon their consistency with those within the NPPF (the greater the consistency, the greater the weight to be attributed).

- 1.15. The Managing Development Delivery Local Plan (MDDLDP) does not update the CS but rather sets out the measures to be implemented to achieve the objectives of the CS. Additionally, whilst only 4 years old, the Arborfield &

Barkham Neighbourhood Plan is based upon the CS and does not cater for a housing need greater than that planned for in the CS.

- 1.16. The development plan is not based upon a NPPF compliant assessment of housing need and cannot be said to be up to date in respect of its housing requirement or in relation to policies that seek to restrict development within the defined settlement boundaries.
- 1.17. Its content pre-dates the publication of the NPPF and the NPPG together with the Hunston and Solihull High Court Judgments; which require LPAs to undertake an assessment of the objectively assessed housing need. Accordingly, and even at the point of adoption, the CS did not meet the objectively assessed need for housing during the plan period, which represents a clear conflict with paragraph 60 of the NPPF to significantly boost the supply of homes.
- 1.18. The current boundaries (defining the settlements and the countryside beyond) cannot be maintained in their current position if the current identified housing need is to be met. This is a material consideration of significant weight in the consideration of this application.
- 1.19. As a result, the settlement boundaries defined in the development plan are manifestly out of date. This also engages the tilted balance at paragraph 11(d) of the NPPF.
- 1.20. Taken together, the “out of date” housing requirement, and settlement boundaries which do not meet the local housing need, substantially reduce the weight to be given to any breach of the adopted settlement policy boundaries. Furthermore, the housing requirement and resulting strategy to meeting the housing need is based upon a pre-NPPF methodology. Whilst paragraph 225 of the NPPF states that policies that pre-date the publication of the NPPF should not necessarily be considered out of date if they are consistent with those within the NPPF – the method of calculating housing need is not.
- 1.21. Additionally, the most important policies for determination of the application are out of date, as the Council is not able to demonstrate the necessary supply of

deliverable housing land¹ (footnote 8 NPPF).

- 1.22. In the circumstances, the policies for the supply of housing are out of date for two reasons (any one of which triggers the tilted balance at paragraph 11(d) of the NPPF):
- (i) the spatial application of settlement boundaries (which have been breached in order to meet current housing need);
 - (ii) the lack of a four year supply of deliverable housing land;
- 1.23. Therefore, the test to be applied by the decision maker is, firstly, whether any footnote 7 considerations provide a clear reason for refusing development (which they do not); and secondly, whether the adverse impacts of granting planning permission would **significantly and demonstrably** outweigh the benefits. In the case of the Application Scheme, they do not.
- 1.24. In carrying out the paragraph 11 planning balance for this Scheme, housing need and supply are important material considerations, given the emphasis in the Framework. It is national policy to significantly boost the supply of housing, which is unsurprising in the context of an acknowledged broken housing market and housing crisis faced by the Country.
- 1.25. Given the overwhelming need for affordable housing in Wokingham generally, this proposal strikes an appropriate balance between meeting identified housing needs whilst also respecting the location of the site, in a sustainable location.
- 1.26. The Illustrative Masterplan has been informed by a thorough technical appraisal of the character of the site and surrounding area. The development will provide for much-needed housing in a sustainable location, in accordance with the policy context provided by the Development Plan and the NPPF.
- 1.27. There are a range of material considerations which justify the grant of planning permission. These include the approach set out at paragraph 11(d) of the Framework, the Council's delayed progress in preparing a new Local Plan

¹ [Wokingham Borough Council Five Year Housing land Supply position Statement at 31 March 2023 \(January 2024\)](#)

covering the period to 2038, the lack of the necessary four year supply of deliverable housing land, the acute need for affordable housing as well as the economic, social and environmental benefits associated with the Scheme.

- 1.28. In accordance with paragraph 11 and 188 of the Framework, the presumption in favour of sustainable development does not apply where the application of policies in the Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed (including, but not limited to, habitat sites, and areas at risk of flooding).
- 1.29. Heritage considerations apply to the assessment of the Application Scheme. However, and for the reasons stated, this consideration does not provide a clear reason for refusing the development proposed, since the proposal is compliant with NPPF policy on this (and all other) issues.
- 1.30. To determine whether the Scheme is in fact sustainable, one must carry out the planning balance under s.38(6) and assess all material considerations in the context of the objectives set out at paragraph 8 of the NPPF (economic, social and environmental, which are interdependent).
- 1.31. The Design & Access Statement produced by DHA Architecture confirms that the Site is not identified for any landscape value. It also provides a detailed understanding of the local landscape and considers how the development proposals will affect the various receptors.

The Application

- 1.32. In so far as the planning application is submitted in outline, only the principle of developing the site for up to 111 dwellings including 40% affordable housing and the means of access are to be determined as part of the application. All other matters of detail, including appearance, landscaping, layout and scale are reserved for subsequent determination.
- 1.33. The Application site is shown edged red on the accompanying Site Location Plan No. 052403-DAN-LOC01 and extends to approximately 6.4ha.

- 1.34. Details of how the site could be developed for the proposed uses are shown on Illustrative Masterplan Plan No. 052403-DA-MP01. It is anticipated that a planning condition will require the subsequent reserved matters application to be in general conformity with the Illustrative Masterplan.
- 1.35. The access arrangements are shown on Plan No. 147.0017.0001 Rev P06 (Appendix B to the Transport Assessment ("TA") prepared by Paul Basham Associates).
- 1.36. As detailed in the Flood Risk Assessment (FRA") that accompanies the application, the site is classified as falling within Flood Zone 1, placing it within the category of land at the lowest risk of flooding from fluvial sources.
- 1.37. The Council is not able to demonstrate a four year supply of deliverable housing land², such that the delivery of market and affordable housing attracts very substantial weight in all planning balances. Additionally, development of the Site for various types of housing (including market and affordable, flats and houses with 1 – 4 bedrooms) will bring about economic and social benefits.
- 1.38. As set out in the TA accompanying the application, the site is well connected to Reading and Wokingham, and Arborfield Garrison which is the flagship sustainable new community planned and designed by the Council in the Core Strategy, with access to walking and cycling routes as well as to public transport. Including a frequent bus service to Reading (with bus stops on the site frontage). There are a range of facilities in the surrounding area that can support the development via a local short journey; and the addition of new residents would improve the viability of these local services. The proposal meets the relevant regional and local transport policy requirements and therefore can be considered acceptable in these terms.
- 1.39. As to schematics, the scale parameters, paragraphs 3 and 4 in Article 4 of the Town and County Planning (Development Management Procedure) (England) Order 2010 were deleted by Amendment Order No.3 dated 31 January 2013 such that outline planning applications, where layout is a reserved matter, are no longer required to state the approximate locations of buildings; and where

² The consultation draft NPPF requires a five year supply of deliverable housing land.

scale is a reserved matter they are no longer required to state the upper and lower height, width and length parameters.

- 1.40. Information shown on the supporting plans and particulars includes sufficient detail to evaluate and assess the general planning and layout principles that are submitted in support of the proposal.
- 1.41. As set out in this Planning Statement, the benefits of the scheme include the provision of both market and affordable housing, in a sustainable location, within walking distance from local services and facilities, to help meet an identified housing need within the Borough.
- 1.42. The Scheme also secures additional local expenditure through an increased local population, council tax revenues, and new homes bonus as well as additional construction jobs.
- 1.43. Although the application is in outline, with only (i) the principle of developing the site for up to 111 dwellings; and (ii) the means of access to be determined at this stage, the Illustrative Masterplan and Landscape Strategy provide for onsite landscaping and biodiversity enhancements, which mitigate the impact of the proposed development in landscape and visual terms.
- 1.44. As set out in this Statement, the scheme accords with relevant planning policy considerations, including the presumption in favour of sustainable development set out in the NPPF.

Benefits of the Proposed Scheme

- 1.45. In assessing the merits of the Application, the **benefits** of the scheme include the following:
 - Provision of much needed affordable (up to 44 affordable homes) and market housing (up to 111 dwellings total, including the affordable homes), helping to meet identified housing needs in the context of a shortfall in land supply and a duty to boost significantly the supply of housing (see paragraph 60 of the NPPF).
 - Delivery of a significant proportion of affordable housing (40%), in line with the development plan policy requirement.

- Opening up private land to provide new public open space, greenspaces and equipped play area.
- Increased local expenditure to sustain and support local services and facilities.
- Local job opportunities and increased economic activity in the short, medium and long term.
- The Scheme supports and complies with the economic, social and environmental objectives of the NPPF.

Content

1.46. The remainder of this Planning Statement is set out as follows:

Section 2:	Description of the Site and Surrounding Area
Section 3:	Description of the Proposed Scheme
Section 4:	Summary of Supporting Material
Section 5:	Planning Policy Framework and Material Considerations
Section 6:	Assessing the Acceptability of the Application Scheme
Section 7:	Summary

2. DESCRIPTION OF THE SITE AND SURROUNDING AREA

Context

- 2.1. The Application Site is shown edged red on the accompanying Site Location Plan No. 052403-DAN-LOC01 and extends to approximately 6.4ha.
- 2.2. The Site comprises privately owned fields, a paddock and a caravan storage area. The Site boundaries are demarked by hedgerows and mature trees to the east, west and south with residential development abutting the northern and part of the southern boundaries.
- 2.3. To the north and west of the site is a string of residential development along Church Lane, the immediate vicinity east of the site is characterised by open fields associated with the Lockey Farm complex whilst land to the immediate south of the site, on the opposite side of Reading Road, is characterised predominantly by residential development along Walden Avenue and the Cross Lands Farm complex.
- 2.4. Built form denotes the slightly wider site context with development along Greenward lane, Reading Road, Church lane, Swallowfield Road and Sindlesham Road which encapsulates the site. Additionally, the settlements of Arborfield Cross and Arborfield Green (including the Arborfield Garrison development and the services and facilities provided thereon). As such, the site is well related to the existing surrounding urban environments.
- 2.5. The Site is located within walking distance of the local services, being situated approximately 1km west of the centre of Arborfield Cross and therefore benefits from easy access to a variety of local amenities. These amenities include a primary school, a public house, a convenience store and a recreational ground.
- 2.6. As explained in the accompanying TA, there is also a good bus service in close proximity to the site; bus route Leopard 3 runs between Reading and Wokingham, with the nearest stops located along the site's southern boundary on Reading Road. The frequency is around 2-4 buses/hour Monday-Saturday, (running from 06:05 to 23:36) and twice hourly on Sundays (running from 08:39 to 21:44).

- 2.7. The Application Site's proximity to existing local centres, facilities and other such services demonstrates the sustainability merits of the site for housing when set against the Council's on-going housing need.

The Site

- 2.8. The Site comprises a network of fields, a paddock and land currently in use for caravan storage on the northern side of Reading Road, Arborfield.
- 2.9. The Site is bound on two sides by existing residential development; to the north on Church Lane, and to the south by properties fronting onto Reading Road. The eastern boundary is defined by open fields associated with a neighbouring farm complex. The western boundary is demarcated by a strong vegetated belt with further residential development along Church Lane just beyond.
- 2.10. The surrounding area is semi-rural in character with bands of residential development set back from the highway within leafy frontages.
- 2.11. There is an existing private pedestrian and vehicular access point to the site from Reading Road; this is proposed to be utilised as the access point for the proposed development.
- 2.12. The Multi Agency Geographic Information for the Countryside Map ('MAGIC') and the Proposals Map indicates that the site is not covered by any statutory designations for landscape character or quality. The site is also not located within the Green Belt.
- 2.13. The Site is not within any Conservation Areas and there are no Listed Buildings on the site itself. Two Grade II listed buildings are located to the northwest and northeast of the site. Details of these heritage assets are contained within the supporting Heritage Statement.
- 2.14. As to the assessment of landscape considerations, the site is generally visually well-contained from public views. The well-vegetated Site boundaries and surrounding built form, limit views of the Site to the immediate surroundings. Views are possible from adjoining properties to the north and south.

- 2.15. Views of the proposed development will be limited due to the surrounding established boundary vegetation and built form, which will help to visually contain the proposed new homes. Properties on Church Lane to the North of the Site would back onto some of the proposed dwellings in a manner compliant with the guidance published in the Council's Borough Wide Design Guide.
- 2.16. Views from Reading Road and Church Lane will be largely restricted by the retained and enhanced foliage around the site's periphery and supported by existing neighbouring properties, although occasional glimpsed views of the new houses may be possible through gaps between existing properties and trees. The new access road junction into the Site will also be visible in near distance views along Reading Road.
- 2.17. In so far as the Site is visually well contained from the wider area by the existing planting; further contained by existing residential development on two sides, the impacts on openness would be limited.
- 2.18. Overall, and for the reasons stated, there are no environmental or statutory designations that would otherwise serve to limit the development potential of the Site.

3. DESCRIPTION OF THE PROPOSED SCHEME

General

- 3.1. The outline application scheme has been developed and informed following a thorough review of the opportunities and constraints afforded by the Site.
- 3.2. Only the principle of developing the site for up to 111 dwellings (C3 use), including 40% affordable housing (up to 44 dwellings), together with the means of access are to be determined as part of this outline application.
- 3.3. Appearance, landscaping, layout and scale are reserved for subsequent determination.
- 3.4. The application description is as follows:

“Outline application for up to 111 dwellings, with associated works, parking, landscaping and publicly accessible open space, with access from Reading Road”

- 3.5. The proposals are set out on the following plans:

The Scheme

- i. Site Location Plan No. 052403-DAN-LOC01
- ii. The access arrangements are shown on Plan No. 147.0017.0001 Rev P06 (Appendix B to the Transport Assessment (“TA”) prepared by Paul Basham Associates).

Supporting Plans

- iii. Illustrative Masterplan No. 052403-DAN-MP01
 - iv. Indicative Land Use Plan No. 052403-DAN-ILUP
- 3.6. The Plans at (i) and (ii) comprise the application plans for the purpose of determining the application.
 - 3.7. Plans (iii) and (iv) can be subject to a condition requiring the reserved matters scheme to be in general conformity with these plans.

Masterplan Approach

- 3.8. Preparation of the Illustrative Masterplan has been informed by the technical studies summarised in Section 4, and consideration of relevant planning policy considerations summarised in section 5. Figure 1 refers.



Figure 1: Proposed Illustrative Masterplan

- 3.9. The Illustrative Masterplan approach has been informed by the location of the site access, as well as the site's topography and drainage requirements. Furthermore, the proposed developed area will be situated away from key existing landscape features to retain the character of the area.
- 3.10. The Masterplan vision is to create a high-quality and considered development, that responds appropriately to the constraints and opportunities within the Site and provides a range of dwelling sizes to meet different occupiers' needs. These will be set within a hierarchy of streets, with plenty of green space and natural surveillance. The houses will be designed to respect and reflect the character of the area, so that the development has a bespoke design which is in keeping with the established local character.

3.11. The Masterplan approach, including in relation to design, is underpinned by a thorough contextual appraisal of the site and its surroundings. Full details are set out in the accompanying Design and Access Statement.

3.12. The vision is to be achieved through the following design principles included in the Masterplan design:

- Delivering a scheme which embodies the characteristics of the area.
- Making optimum use of the land for the delivery of new homes, with development form and density appropriate to the location.
- Delivering a development with a range of house sizes, types and tenures in response to local need.
- Conserving and enhancing the landscape, ecology and natural resources around the site with green corridors and linkages.
- Respecting the amenity and setting of neighbouring residential development.
- Maximising the linkages between the site and surrounding area and provide opportunities for walking and cycling.
- Developing an inclusive, safe and secure residential environment.
- Providing adequate on-site arrangements for vehicular access, servicing and parking, including the emergency services and statutory authorities.

3.13. The Design & Access Statement also sets out the following key landscape principles upon which the Masterplan is based:

- Retention of the existing landscape framework of hedgerow and tree lined field boundaries, ensuring the proposals are well integrated into the existing landscape.
- Setting development back from Reading Road to retain and respect the character of the area.
- Proposed building heights to be between two and two-and-a-half storeys, reflecting the surrounding context.
- Creation of recreation opportunities within the Site proposals, including a generous areas of public open space (including equipped play area)

- Provision of street trees throughout the new development, to break up the housing and assist in filtering views.

3.14. The principal elements of the scheme are summarised as follows:

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

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

Access and Layout

3.16. Illustrative Masterplan No. 052403-DAN-MP01 shows one way in which the proposed residential development could be laid out on the Site. The location of the vehicular access point onto Reading Road is the only suitable access point for the Site. The determination of this access point has been informed by a speed survey to inform required visibility splays, topographical and arboricultural surveys.

3.17. The principle of a simple bell mouth junction design, developed in line with DMRB standards and with the appropriate forward visibility, is proposed as the means of vehicular access, and main pedestrian access, to the site. This

junction can accommodate the predicted development traffic that would be generated by the development. Additional pedestrian links to the existing bus stops on Reading Road are also proposed to ensure safe access for existing and future residents.

- 3.18. The carriageway width of 5.5m will accommodate vehicular access into the Site with footpath connections proposed to link into the wider footpath network along the western and southern site boundaries. (as detailed on Plans at Appendices B in the TA).

Land Uses

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

Dwelling Mix

- 3.22. The Scheme proposes 40% affordable housing (which equates to 44 dwellings based on a 111 dwelling scheme).
- 3.23. The remaining (up to) 67 market dwellings will comprise a range of 1 – 4 bedroom houses, mix to be agreed at the reserved matters stage.
- 3.24. The development will allow for a mix of housing sizes, types and tenures, to meet the local needs identified in the most recent evidence base. This could include a mixture of family housing and smaller starter homes.

Affordable Housing Mix

- 3.25. The affordable housing provision meets the current policy requirement of 40% on greenfield sites of 5 or more dwellings as set out in Core Strategy Policy CP5 and seeks to address the acute affordable housing need within the Borough. Although the market mix is not proposed to be fixed through the application, it is intended that the S106 will secure the affordable housing mix.
- 3.26. In accordance with the approach set out in Managing Development Delivery Local Plan Policy TB05 and the Council's Affordable Housing Supplementary Planning Document, the affordable housing component of the scheme (44 dwellings; 40%) is expected to comprise of:
- 8 x 1-bed dwellings
 - 21 x 2-bed dwellings
 - 9 x 3-bed dwellings
 - 6 x 4-bed dwellings
- 3.27. The application process will determine the exact mix of the affordable housing component of the Scheme, to be secured through a legal agreement.

Landscaping

- 3.28. Although landscaping is a reserved matter, the accompanying Illustrative Masterplan provides an overview of the landscape principles to be applied at the reserved matters stage. These include;

1. Retention of the existing landscape framework,
2. Residential landscaping,
3. Incorporation of SuDs features, and
4. Public open space and recreational routes.

3.29. It is envisaged that the public spaces will be managed and maintained through the establishment of a Management Company, whilst the residential landscaping will be the responsibility of each plot owner.

Density

3.30. With a gross site area of 6.44ha, the gross density is 17.3dph.

4. SUMMARY OF SUPPORTING MATERIAL

General

4.1. As set out above, a range of technical studies and reports have been undertaken and prepared in support of the Application and comprise as follows:

- Arboricultural Impact Assessment (Ruskins Tree Consultancy), including:
 - Arboricultural Impact Assessment
 - Tree Condition Survey
 - Tree Survey Plan Drawing No. TSP 1
 - Tree Removals Plan Drawing No. TRP 1
- Design and Access Statement (DHA Architecture)
- Ecological Impact Assessment (Sam Watson Ecology), including:
 - Biodiversity Net Gain
- Landscape and Visual Appraisal –(GL Studios)
- Archaeological Desk Based Assessment (RPS)
- Energy and Sustainability Statement (JSP Sustainability)
- Flood Risk Assessment and Surface Water Drainage Strategy (RCP)
- Transport Assessment and Travel Plan (Paul Basham Associates), Including:
 - Proposed Site Access Plan No. 147.0017.0001 Rev P06 (Appendix B to the TA)
 - Traffic Survey
 - Swept Path Analysis
 - Stage 1 Road Safety Audit
 - TRICS Report
 - Distribution Diagram
 - Site Access Modelling Results
- Ground Phase 1 Desk Study (Wilson Bailey)
- Utilities Statement (Connect It)

4.2. The content of the technical reports submitted in support of the application is summarised below.

Arboricultural Impact Assessment

- 4.3. A total of 92 trees/groups of trees/hedgerows were surveyed. The results confirm that, whilst there are a small number around the site's periphery, no ancient or veteran trees are affected as part of this proposal. Moreover, the report confirms that no ancient woodland forms part of the site or is affected.
- 4.4. A single Tree Preservation Order, LPA Ref: 0272/1984, protects four individual and two groups of trees on the Site. These are located on the site's southern boundary in an area proposed to be public open space, and so do not have a direct effect on the potential future layout of the development, however their Root Protection Areas (RPA's) will need to be considered as a development constraint.
- 4.5. Four high-quality tree features at the Site, three oaks (T50, T56 & T72) and a lime (T39) along the western boundary, but only the lime is protected by a TPO. 33 of the remaining trees are considered to be of moderate quality with a further 52 being assessed of poor quality. 3 trees were found to be Category U meaning they cannot realistically be retained as living. Trees T13, and G12 are located near the access in the north but are not protected by a TPO and are of moderate quality. Care has been taken to ensure the proposed access is sited outside the RPA of these trees.
- 4.6. The AIA also prescribes protection measures to be followed during construction on the Site and details of the RPA's of the trees to be retained. The AIA concludes that, subject to the implementation of the advice contained within this report, the outline proposal is acceptable from an arboricultural perspective.
- 4.7. Further arboricultural input into the detailed design of construction management, drainage/utilities and hard and soft landscaping at the Reserved Matters stage will also ensure that potential impacts on trees are avoided or reduced to an acceptable level. The retained trees can be adequately protected during construction activities to sustain their health and longevity. A detailed Arboricultural Method Statement and finalised Tree Protection Plan will be produced to support the Reserved Matters application(s). Where the feasibility of a scheme has been agreed upon by the Local Planning Authority, this detail can be agreed and submitted at the Reserved Matters stage.

Design and Access Statement

- 4.8. The Design and Access Statement (“DAS”) provides a description and visual overview of the Site context, architectural character of the area, summary of supporting technical documents, and rationale behind the evolution of the Illustrative Masterplan in response to the identified constraints and opportunities afforded by the Site.
- 4.9. The DAS confirms that neither the Site nor the immediate landscape is covered by any statutory or non-statutory designations for landscape character or quality.
- 4.10. There are no public rights of way crossing the Site, but a number of green routes, bridleways and PROWs pass nearby. A number of trees on site are covered by Tree Preservation Orders, details in the AIA.
- 4.11. The landscape principles proposed in DAS are summarised in section 3 above, which principles have informed the overall masterplan approach.
- 4.12. There is currently no public access to the Site, and views of the Site are generally limited to the surrounding properties, as the Site is well contained.
- 4.13. Overall, and in line with the landscape principles that have informed the scheme design, the Site is capable of being developed without resulting in material effects on the visual amenity of the area or the wider landscape character beyond that of the Site.
- 4.14. Given the contained nature of the Site, the DAS assesses that it is capable of accommodating development in line with that shown on the Illustrative Masterplan, without resulting in material harm to the surrounding countryside’s landscape and visual character.

Ecological Impact Assessment

- 4.15. The Ecological Impact Assessment (“EIA”) reports on the findings of the desktop study and targeted species surveys which have been undertaken at the Site.
- 4.16. The report confirms that the site does not support great crested newts, and no badger activity was recorded on site.
- 4.17. Low numbers of grass snake were recorded on site. The report concludes that a precautionary approach to site clearance is suitable to avoid any adverse effects upon this species.
- 4.18. The buildings on site were assessed as having negligible potential to support roosting bats. Additionally, whilst the surveys also identified bat activity across the site, the site itself is of low suitability for foraging. The report highlights that the proposed SuDS basins provide an opportunity to enhance the local environment for commuting and foraging bats.
- 4.19. No particularly rare or notable species of bird were recorded on site. As such, subject to site clearance outside bird nesting season, the report concludes that the proposed development is unlikely to result in adverse effect upon nesting and breeding birds.
- 4.20. Opportunities for ecological enhancement may be secured by planning condition. New habitat creation is proposed to include boundary planting, the incorporation of insect, bird and bat boxes, and the creation of hedgehog highways.
- 4.21. Based on successful implementation of the proposed avoidance, mitigation and enhancement, the development is not anticipated to result in any significant residual negative effects on important ecological features. Furthermore, it has been demonstrated that the scheme can secure a net gain in biodiversity through the implementation of off-site offsetting measures. The scheme is considered to accord with all relevant nature conservation legislation, as well as with the provisions of Policy CP7 of the Wokingham Borough Core Strategy

and the NPPF.

- 4.22. The supporting Biodiversity Net Gain Assessment concludes that, subject to on-site habitat creation combined with off-site mitigation, the proposed development can achieve a biodiversity net gain of 10%.

Landscape & Visual Appraisal

- 4.23. The landscape and visual appraisal confirms that the site is not located with a valued landscape with regard to paragraph 180 of the NPPF and is of low landscape value.

- 4.24. A number of mitigation measures are proposed within this report, including:

- Retention and enhancement of boundary vegetation
- Retention and enhancement of views of St Bartholomew's Church Spire
- Public Open Space located on the eastern site boundary
- Enhanced tree planting within residential parcels

- 4.25. The report also concludes that the local landscape is capable of accommodating a medium change related to the proposed development without consequentially adverse effects upon its quality, condition or defining characteristics.

Archaeological Desk-Based Assessment

- 4.26. The Archaeological Desk-Based Assessment concludes that the site does not play host to any designated archaeological assets. Moreover, it identifies that the site does not form the setting of any such assets either.

- 4.27. The report concludes that, should any further field work be required, this can be secured by way of a suitably worded condition upon the grant of planning permission.

Energy and Sustainability Statement

- 4.28. The Energy and Sustainability Statement follows the energy hierarchy; Be Lean, Be Clean and Be Green in order to achieve a reduction in carbon emissions as per the Part L Building Regulations (2021).
- 4.29. The energy strategy is firstly based upon incorporating passive design measures as follows:
- A well-insulated building fabric shell.
 - Building orientation to maximise passive solar gain
 - Space heating from low carbon monobloc air source heat pumps
 - Intelligent building design including thermally broken lintels to limit heat loss
 - Energy efficient light fittings
 - Water efficiency measures such as water efficient taps, toilets and showers
- 4.30. A number of renewable energy technologies were considered, and low carbon monobloc air source heat pumps are a suitable choice for space and water heating for each of the proposed dwellings.
- 4.31. The Scheme's emission forecast is set to better the standards set by Part L of the Building Regulations by 68.69% and all homes will be zero carbon ready at the point of first occupation.

Flood Risk Assessment and SuDS Strategy Report

- 4.32. The Flood Risk Assessment ("FRA") prepared by RCP Consulting Engineers details the drainage and flood risk matters including the baseline conditions, the overall flood risk posed and the scope for mitigation.
- 4.33. The Site is classified as falling within Flood Zone 1, placing the site in the lowest flood risk category.
- 4.34. The FRA concludes that the principle of the proposed development is entirely acceptable with regard to flood risk grounds, and the scheme can make a positive contribution towards sustainable surface water management.

Transport Assessment

- 4.35. As demonstrated throughout the Transport Assessment (“TA”) prepared by Paul Basham Associates, the proposed development is submitted in accordance with national and local development policy regarding economic growth, sustainable development and travel.
- 4.36. The TA confirms that the site is well located to take advantage of the existing pedestrian network and public transport facilities in Arborfield, which will be enhanced through the extension of the public footpaths into the site itself. Furthermore, the TA confirms that the site is located within an accessible location, with a range of day-to-day services including educational, retail and convenience leisure facilities. These are all within both an easy walking and cycle distance from the site as shown in Table 2 of the TA.
- 4.37. Section 4 of the TA assesses the impact of the scheme in highway terms and confirms the acceptability of the proposals in relation to existing capacity in the network.
- 4.38. Regarding vehicular movements, the TA demonstrates that the estimated quantum of future additional vehicular movements arising from the proposed development would not significantly change the operation of the local highway network, including factoring in nearby recently permitted schemes, and certainly nothing that could be considered ‘severe’ as set out in paragraph 115 of the NPPF.
- 4.39. The proposed site access arrangement has been informed by a stage 1 road safety audit which indicates that a 5.5m wide access with 2.4m x 102.5m and 2.4m x 101.7m visibility splays would be the most appropriate given the Site’s location and surrounding uses.
- 4.40. Overall, the TA concludes that the site affords a sustainable location in helping to meet identified housing needs, within walking and cycling distance from a range of local services and facilities; and there are no transport and highway reasons that would warrant a refusal of the development for up to 111 dwellings.

Statement of Community Involvement

- 4.41. An online public consultation event was carried out in February 2023, with leaflets being sent to 116 addresses directing them to a website with details of the draft development proposals.
- 4.42. A total of 32 unique comments were received, which mainly raised concerns regarding impacts to the local highway network, ecological impacts, and increased stresses on wider infrastructure. These have been addressed by the consultant team in the final submission version of the application.
- 4.43. A further public engagement exercise was undertaken over 3 weeks in September and October 2024 (inviting responses until 16 October 2024). A flyer was delivered to 412 local addresses. A total of 16 responses were received, mainly raising concerns around flooding, highways and principal of more housing in the locality. The comments were considered and have been addressed in the suite of application documents.

Phase 1 Preliminary Risk Assessment

- 4.44. A preliminary risk assessment had been produced by Wilson Bailey to determine the extent of any land contamination and/or geotechnical constraints of the site.
- 4.45. The report is formed by data collated via a desk based study and a site visit. Combined, these studies assessed the following:
- The site's development history
 - A study of historical ordinance
 - Local geology, hydrogeology and surface water setting
 - An assessment of the visual condition of the Site
- 4.46. The results of this analysis were used to inform the development of an initial conceptual site model, preliminary considerations of geotechnical constraints/hazards and recommendations of any further actions required.

4.47. The report concludes that the Site's potential for significant and contaminative impact is low with only the following measures recommended:

- a standard geo-environmental watching brief
- topsoil materials management
- Intrusive ground investigations to inform detailed road and pavement design at reserved matters stage

4.48. Each of the measures above can be secured by condition.

Utilities Statement

4.49. An audit of the existing utility infrastructure in the vicinity of the application site has been undertaken. This report assesses potential points of connection and capacity within the established utility networks to accommodate the proposed development.

4.50. The report identifies that the following utilities are available to be connected to within the vicinity of the site (subject to agreement with the relevant providers)

- Electricity (Supplied by SSE)
- Gas (Supplied by Southern Gas Networks)
- Telecommunications (Virgin Media)
- Water (Thames Water)
- Wastewater (Thames Water)

5. PLANNING POLICY FRAMEWORK AND MATERIAL CONSIDERATIONS

General Overview

- 5.1. This section summarises the planning policy position against which the acceptability of the scheme is determined.
- 5.2. Section 38(6) of the Planning and Compulsory Purchase Act 2004 sets out a statutory requirement that planning applications be determined in accordance with the Development Plan unless other material considerations indicate otherwise. This represents the s.38(6) 'balance'.
- 5.3. The development plan, for the purposes of this application, comprises:
- Wokingham Core Strategy (adopted January 2010), and the
 - Managing Development Delivery Local Plan (adopted February 2014).
 - Arborfield & Barkham Neighbourhood Plan (made April 2020)
- 5.4. Collectively, the Development Plan is out of date with respect to delivery of a strategy for meeting identified housing needs and consequently with respect to policies for the spatial application of its housing policies. Additionally, the Council is not able to demonstrate a four-year supply of deliverable housing land¹ rendering the 'most important policies' for determination of the application 'out of date' pursuant to footnote 8 of the NPPF.
- 5.5. In the circumstances, the policies for the supply of housing are out of date for two reasons (any one of which triggers the tilted balance at paragraph 11(d) of the NPPF):
- (i) the spatial application of settlement boundaries (which have been breached in order to meet current housing need);
 - (ii) the lack of a four-year supply³ of deliverable housing land; and
- 5.6. As such the starting point is that this planning application should be approved

³ The consultation draft NPPF requires a five year supply of deliverable housing land.

unless footnote 7 considerations provide a clear reason for refusing development (which they do not); or any adverse impacts of granting planning permission would “significantly and demonstrably” outweigh the benefits. There is no clear reason for refusal on the basis of any footnote 7 matters, and it is clear that the adverse impacts do not significantly and demonstrably outweigh the benefits.

5.7. The material considerations indicate that the proposal should be supported. They include as follows:

- The Council’s acceptance that they cannot demonstrate a four-year supply of deliverable housing land;
- The significant need for housing (market and affordable);

5.8. Additionally, the NPPF is a material consideration of particular standing in the determination of planning applications.

5.9. Section 39 of the 2004 Act identifies the requirement for decision-makers to exercise their functions with the objective of contributing to the achievement of sustainable development.

5.10. These requirements must be considered in light of the NPPF, including the three roles of sustainability set out at paragraph 8 (economic, social and environmental). However, and as set out at paragraph 9 of the NPPF, the three roles are not a checklist, and their values are considered below in light of that context.

Assessment against Development Plan policy

5.11. A summary of relevant policy is set out below, together with an assessment of the scheme’s compliance (or otherwise) with the same.

[Wokingham Core Strategy \(2010\)](#)

5.12. The Wokingham Core Strategy was adopted in July 2010 and sets out the overarching strategy in seeking to meet development needs in the period 2010 to 2026.

5.13. Policy CP17 of the Core Strategy requires a minimum of 13,230 net additional dwellings to be provided during the plan period (2006 to 2026), equivalent to 662dpa. This compares to the 748dpa derived from the application of the current Standard Method ("SM") (identified in section 5) and the 1,308dpa derived from the proposed SM in the consultation draft NPPF.

5.14. In so far as the Council is unable to demonstrate a four, let alone a five year supply of deliverable housing land, the presumption in favour of sustainable development at paragraph 11(d) of the NPPF is engaged.

5.15. The Application Site comprises greenfield land outside defined settlement boundaries. As such, the site falls to be determined as countryside development.

5.16. A summary of the relevant policy considerations follows below.

Core Strategy Policy	Policy Summary and Assessment
CP1 – Sustainable Development	Planning permission will be granted for development proposals that: 1. Maintain or enhance the high quality of the environment 2. Minimize the emissions of pollutants into the wider environment 3. Limit any adverse effects on water quality (including ground water) 4. Ensure the provision of adequate drainage 5. Minimise the consumption and use of resources and provide for recycling; 6. Incorporate facilities for recycling of water and waste to help reduce per capita water consumption; 7. Avoid areas of best and most versatile agricultural land; 8. Avoid areas where pollution (including noise) may impact upon the amenity of future occupiers; 9. Avoid increasing (and where possible reduce) risks of or from all forms of flooding (including from groundwater); 10. Provide attractive, functional, accessible, safe, secure and adaptable schemes; 11. Demonstrate how they support opportunities for reducing the need to travel, particularly by private car in line with CP6; and 12. Contribute towards the goal of reaching zero-carbon developments⁴¹ as soon as possible by:

	- Including appropriate on-site renewable energy features; and - Minimising energy and water consumption by measures including the use of appropriate layout and orientation, building form, design and construction, and design to take account of microclimate so as to minimise carbon dioxide emissions through giving careful consideration to how all aspects of development form. The settlements within Elmbridge fall within the following broad categories: - As evidenced by the range of supporting technical studies, the Site can deliver the energy efficiency, sustainable transport, and water usage objectives of this policy. The Council is unable to demonstrate a 4 year housing land supply evidencing that the requirement to avoid the use of greenfield sites is not meeting housing demand. By virtue of the tilted balance at paragraph 11(d) of the NPPF and the evidence in the supporting technical reports, the proposed development would accord with Policy CP1.
CP2 – Inclusive Communities	To ensure that new development contributes to the provision of sustainable and inclusive communities (including the provision of community facilities) to meet long term needs, planning permission will be granted for proposals that address the requirements of: a) An ageing population, particularly in terms of housing, health and wellbeing; b) Children, young people and families, including the co-ordination of services to meet their needs; c) People with special needs, including those with a physical, sensory or learning disability or problems accessing services; and d) The specific identified needs of minority groups in the borough, including Gypsies, Travellers and Travelling Showpeople and black and minority ethnic groups. Proposals for gypsies, travellers and travelling showpeople (including allocations in other Development Plan Documents) will demonstrate that: i) The site is located either within or close to the development limits of a settlement in policy CP9 in order to maximise the possibilities for social inclusion and sustainable patterns of living; and ii) The proposed site is not disproportionate to the scale of the existing settlement whether singly or cumulatively with any existing sites in the area. The Site is located in close proximity to the settlements of Arborfield Cross and Shinfield which host a wide range of amenities and services. The proposed development will provide a range of dwelling types and tenures (including 44 affordable) that would cater for a wide range of community demographics. The proposal therefore complies with the requirements of Policy CP2
CP3 – General Principles for Development	Planning permission will be granted for proposals that: a) Are of an appropriate scale of activity, mass, layout, built form, height, materials and character to the area together

	with a high quality of design without detriment to the amenities of adjoining land users including open spaces or occupiers and their quality of life; b) Provide a functional, accessible, safe, secure and adaptable scheme; c) Have no detrimental impact upon important ecological, heritage, landscape (including river valleys) or geological features or water courses. d) Maintain or enhance the ability of the site to support fauna and flora including protected species; e) Use the full potential of the site and contribute to the support for suitable complementary facilities and uses; f) Contribute to a sense of place in the buildings and spaces themselves and in the way they integrate with their surroundings (especially existing dwellings) including the use of appropriate landscaping; g) Provide for a framework of open space in secure community use achieving at least 4.65 ha/1,000 population provision together with recreational/sporting facilities in addition to private amenity space; h) Contribute towards the provision of an appropriate sustainable network of community facilities; i) Do not lead to a net loss of dwellings and other residential accommodation or land; and j) Do not lead to a loss of community or recreational facilities/land or infrastructure unless suitable alternative provision is available. Development proposals will be required to demonstrate how they have responded to the above criteria through the submission of Design and Access Statements, clear and informative plans, elevations and streetscenes and where required Masterplans, Development Briefs, Concept Statements and Design Codes. The range of technical studies and the indicative masterplan show that the requirements of Policy CP3 can be met by the proposed development.
CP4 – Infrastructure requirements	Planning permission will not be granted unless appropriate arrangements for the improvement or provision of infrastructure, services, community and other facilities required for the development taking account of the cumulative impact of schemes are agreed. Arrangements for provision or improvement to the required standard will be secured by planning obligations or condition if appropriate. All relevant off-site infrastructure improvements and contributions will be secured via legal agreement.
CP5 – Housing Mix, Density & Affordability	Planning permission will be granted for residential development providing a mix and balance of densities, dwelling types, tenures and sizes. Affordable housing must reflect the sizes and types that meet the proven needs of people who are not able to compete in the general housing market. All residential proposals of at least 5 dwellings (net) or covering a net site area of at least 0.16 ha will provide up

	to 50% of the net additional units proposed as affordable dwellings, where viable. The Council will negotiate the tenure, size and type of affordable units on a site by site basis having regard to housing needs, site specifics and other factors. Subject to viability, the minimum percentages of affordable housing sought on site by land type and location are: <i>Any – Outside development location – 5 dwellings (net) or 0.16ha (net) and larger – 40%</i> The scheme is an outline application, and the final dwelling mix will be fixed at the reserved matters stage. However, the indicative masterplan shows how a varied mix of dwelling sizes and types can be accommodated on-site. In addition, the proposal will provide 44 affordable housing units and an apportioned financial contribution equal to 0.4 affordable units to meet the requirement of Policy CP5.
CP6 – Managing Travel Demand	Planning permission will be granted for schemes that: a) Provide for sustainable forms of transport to allow choice; b) Are located where there are or will be at the time of development choices in the mode of transport available and which minimise the distance people need to travel; c) Improve the existing infrastructure network, including road, rail and public transport, enhance facilities for pedestrians and cyclists, including provision for those with reduced mobility, and other users; d) Provide appropriate vehicular parking, having regard to car ownership; e) Mitigate any adverse effects upon the local and strategic transport network that arise from the development proposed; f) Enhance road safety; and g) Do not cause highway problems or lead to traffic related environmental problems. As set out in the supporting technical reports, and as shown on the illustrative masterplan, the proposed development is capable of meeting the requirements of Policy CP6.
CP7 – Biodiversity	Sites designated as of importance for nature conservation at an international or national level will be conserved and enhanced and inappropriate development will be resisted. The degree of protection given will be appropriate to the status of the site in terms of its international or national importance. Development: A) Which may harm county designated sites (Local Wildlife Sites in Berkshire), whether directly or indirectly, or B) Which may harm habitats or, species of principle importance in England for nature conservation, veteran trees or features of the landscape that are of major importance for wild flora and fauna (including wildlife and river corridors), whether directly or indirectly, or

	C) That compromises the implementation of the national, regional, county and local biodiversity action plans will be only permitted if it has been clearly demonstrated that the need for the proposal outweighs the need to safeguard the nature conservation importance, that no alternative site that would result in less or no harm is available which will meet the need, and: i) Mitigation measures can be put in place to prevent damaging impacts; or ii) Appropriate compensation measures to offset the scale and kind of losses are provided. The site is not located with a designated site. An ecological survey of the site has been undertaken which confirms that, with appropriate mitigation measures, the proposal would not result in any adverse ecological impacts. It is also set out in the accompanying technical reports that development of the Site can achieve a minimum of 10% biodiversity net gain. Any loss that cannot be mitigated on-site will be appropriately compensated for via off-site habitat enhancement as is permitted by the Environment Act 2021. As such, the proposal accords with Policy CP7
CP9 – Scale and Location of Development Proposals	The scale of development proposals in Wokingham borough must reflect the existing or proposed levels of facilities and services at or in the location, together with their accessibility. Development proposals (in addition to the Strategic Development Locations in policies CP18-21) within development limits will be acceptable in: 1) The major development locations of Earley, Green Park, Shinfield (North of M4), Twyford, Winnersh, Wokingham and Woodley; 2) The modest development locations of Arborfield Garrison, Pinewood (Crowthorne), Finchampstead North, Ruscombe, Shinfield, Spencers Wood, Three Mile Cross and Wargrave. 3) The limited development locations of Arborfield Cross, Barkham Hill, Charvil, Finchampstead, Hurst, Riseley, Sindlesham, Sonning and Swallowfield. 4) The boundary of the Science Park proposed under policy CP16 as defined in the Managing Development Delivery DPD. Affordable housing on rural exception sites will be permitted adjoining the Development Limits of Modest or Limited Development Locations, if a need is demonstrated for residents, workers or other people with family connections within the Parish Council's area. The proposal would be in conflict with Policy CP9. However, given the Council's inability to demonstrate a 4 year housing land supply, this policy is considered out of date and very little weight can be applied to it.
CP11 – Proposals Outside Development Limits (Including Countryside)	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 except where: 1) 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 2) It does not lead to excessive encroachment or expansion of development away from the original buildings; and 3) It is contained within suitably located buildings which are appropriate for conversion, or in the case of replacement buildings would bring about environmental improvement; or 4) In the case of residential extensions, does not result in inappropriate increases in the scale, form or footprint of the original building; 5) In the case of replacement dwellings the proposal must: i) Bring about environmental improvements; or ii) Not result in inappropriate increases in the scale, form or footprint of the original building. 6) Essential community facilities cannot be accommodated within development limits or through the re-use/replacement of an existing building; 7) Affordable housing on rural exception sites in line with CP9. The proposal would be in conflict with Policy CP11. However, the consistency of this policy with the NPPF was discussed in the recent Orchard Road, Hurst appeal decision⁴ in which the inspector, at paragraph 86 of their decision stated: <i>“I consider Core Strategy Policy CP11 does not appear to offer a basis to resist development in the countryside that would neither fail to protect the separate identity of settlements nor maintain the quality of the environment, as such development would not conflict with its purpose. Although that brings some flexibility, <u>it is nonetheless more prescriptive than the Framework in regard to proposals outside of settlements, and so the weight I attach to the development plan conflict is reduced somewhat</u>” (our emphasis)</i> In addition to the policy’s inconsistency with the Framework, the weight that can be attached to it is further reduced given the Council’s inability to demonstrate a 4-year housing land supply, this policy is considered out of date and very little weight can be applied to it.
CP17 – Housing Delivery	Provision will be made for the development of at least 13,230 dwellings and associated development and infrastructure in the Borough in the period 2006- 2026 for which substantial investment in infrastructure will be required. These will be provided in the following phases: April 2006 to March 2011 – an average of 600 dwellings per annum April 2011 to March 2016 – an average of 700 dwellings per annum April 2016 to March 2021 – an average of 723 dwellings per annum

⁴ PINS Ref: APP/X0360/W/24/3342812

	April 2021 to March 2026 – an average of 623 dwellings per annum The Council through subsequent DPD will phase and manage the release of allocated sites to ensure the overall targets for the Plan period are met. This will include the identification of reserve housing sites in subsequent DPD, which will be allocated for development post 2026. Allocated sites may be brought forward from a later phasing period where this would not undermine the delivery of sustainable development, including the availability of infrastructure. The early release of sites will be considered by the authority's Executive to ensure the achievement of the overall requirement and the maintenance of a rolling five year supply of housing land. In summary, based at 1 April 2008, the Council expects the at least 13,230 dwelling requirement to be met from the following sources: Completions (1/4/06-31/3/08) 1,506 Existing commitments (planning permissions, resolutions to grant, unimplemented allocations in WDLP) (excludes sites within an SDL) 2,373 Sites to be identified in Major Development Locations 550 Sites to be identified in Modest Development Locations where they should generally not exceed 100 dwellings. 350 Sites to be identified in Limited Development Locations where they should generally not exceed 25 dwellings. 100 Arborfield Garrison SDL (CP19) 3,400 South of the M4 SDL (CP20) 2,500 North Wokingham SDL (CP21) 1,500 South Wokingham SDL (CP22) 2,500 Flexibility -1,292 TOTAL: 13,487 As acknowledged by the Council when determining recent application ref: 232490, the Council cannot demonstrate a 4 year housing land supply. As such, Policy CP17 carries limited weight.
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5.17. In the circumstances, the presumption in favour of sustainable development is applied on account of the development plan being 'out of date' having regard to the lack of consistency between the policies contained therein and the approach to development set out in the NPPF (paragraphs 11, 75 and 225 refer).

5.18. The lack of a four-year supply of deliverable housing land also engages the presumption in favour of sustainable development at paragraph 11(d) of the NPPF.

5.19. In locational terms, Arborfield Cross is identified at paragraph 2.87 of the CS

as a smaller settlement with “a limited range of facilities...although smaller proposals which help support the communities and provide for an identifiable local need may be acceptable”.

- 5.20. The limitation of the services within smaller settlements and their implications upon the level of growth they can facilitate were discussed in the Orchard Road, Hurst appeal² with the Inspector saying at paragraph 48 of their decision:

“the development plan did not deem the village unsuitable for new housing but rather identified it in Core Strategy Policies CP9 and CP17 as one where some limited development could take place, notwithstanding the failings in the services available”

- 5.21. Development proposals above the scale of that envisioned by the Core Strategy in such locations should not be opposed but more be seen as an opportunity to enhance the level of service provision in such areas.
- 5.22. In terms of residential development, the Berkshire (including South Bucks) SHMA⁵ sets out the need for small and affordable family units, as well as private sheltered accommodation.
- 5.23. These objectives can only realistically be met through the provision of additional housing beyond settlement boundaries. Growth is currently constrained, with current settlement boundaries unable to facilitate enough land to meet housing requirements.
- 5.24. However, and in so far as the settlement boundaries are being reviewed through the emerging Local Plan process, it is clear that the current boundaries (defining the settlements) cannot be maintained in their current position if the local housing need identified through the application of the Standard Method is to be met. This is a material consideration that weighs against any conflict between the proposal and the out of date settlement boundaries defined under Policy CP9 of the Core Strategy.

⁵ [Berkshire \(including South Bucks\) Strategic Housing Market Assessment \(2016\)](#)

Wokingham Borough Development Plan: Managing Development Delivery
Local Plan (February 2014)

- 5.25. While the Core Strategy sets out the broad planning framework for the area, the Managing Development Delivery Local Plan sets out detailed proposals and policies in order to implement that overall strategy, and the development objectives for the Borough.

Development Management Plan Policy	Policy Summary and Assessment
CC01 – Presumption in favour of sustainable development	The Policy reflects the presumption as set out in the original version of the NPPF, now paragraph 11. This Statement sets out how the tilted balance can be applied to the determination of this application.
CC02 – Development limits	1. Development limits for each settlement are defined on the Policies Map. 2. 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. 3. Development proposals within the areas allocated as SDL in the adopted Core Strategy (policies CP18-21) will be permitted that are within the identified development limits unless an acceptable alternative has been agreed through the granting of planning permission accompanied by a deliverable SDL-wide: a. Comprehensive masterplan; and b. Infrastructure Delivery Plan which: i. Ensures that the applicant funds and delivers an appropriate share of the SDL infrastructure; and ii. Does not prejudice the comprehensive delivery and implementation of the wider SDL The Council cannot demonstrate a 4-year housing land supply. As such, and as is the case for Policy CC01, little weight can be applied to policies restricting development outside defined settlement limits.
CC03 – Green Infrastructure, trees and Landscaping	This Policy requires developments to protect and enhance existing green infrastructure as well as promoting permeability and access to existing open spaces This application is for outline consent only, but the supporting illustrative masterplan and tree reports show how the objective of Policy CC03 can be achieved on the Site.
CC04 – Sustainable Design and Construction	This policy requires, in combination with the published Sustainable Design and Construction SPD, for development to contribute to environmental sustainability and the mitigation of climate change.

	The supporting energy statement explains how development of the Site will achieve the Council's energy efficiency and sustainability targets.
CC05 – Renewable Energy and Decentralised Energy Networks	This policy requires new development to utilise renewable and low-carbon technologies to achieve a 10% reduction in carbon emissions. The supporting energy statement explains how low-carbon and renewable technologies will be implemented on site to achieve the required reduction of carbon emissions.
CC10 – Sustainable Drainage	This Policy requires that all development proposals must ensure surface water arising from the proposed development including taking into account climate change is managed in a sustainable manner. The supporting flood risk assessment outlines how development of the Site will manage surface water and incorporate sustainable drainage systems. The illustrative masterplan gives an indication of how these features may be incorporated on Site.

- 5.26. Many of the remaining development management policies will be of relevance at the detailed Reserved Matters stage and will be further detailed at that point..

Summary

- 5.27. Given the inability of the existing settlement boundaries to meet the housing need derived from the Standard Method, the conflict with the settlement policy boundaries attracts only limited weight.

Arborfield & Barkham Neighbourhood Plan 2019-2036 (Made April 2020)

- 5.28. The Arborfield & Barkham Neighbourhood Plan ("the NP") sets out the more localised development policies and principles for the area surrounding the Application Site.
- 5.29. Paragraph 14 of the NPPF says that in situations where the presumption at paragraph 11 d) is engaged (which it is here), the adverse impacts of allowing development that conflicts with the Neighbourhood Plan is likely to outweigh the benefits providing the following apply:
- a) the neighbourhood plan became part of the development plan five years or

less before the date on which the decision is made; and

- b) the neighbourhood plan contains policies and allocations to meet its identified housing requirement (see paragraphs 67-68).

5.30. The inclusion of the word 'and' in paragraph 14 means that both criteria must be met in order for this policy to take effect.

5.31. The NP is less than 5 years old (criteria a) but does not contain policies and allocations to meet its housing requirement. As such, the presence of the NP does not disengage the presumption in favour of sustainable development at paragraph 11(d) of the NPPF.

5.32. Akin to those of the Core Strategy and MDD, due to the inability to demonstrate the requisite housing land supply position, the policies within the NP are out of date and limited weight can be attributed to them.

5.33. Nevertheless, the table below details how the proposal accords with the requirements of the NP when taken as a whole.

Neighbourhood Plan Policy	Policy Summary and Assessment
IRS1: Preservation of Separation of Settlements	This policy reiterates that development outside defined settlement boundaries are required to comply with Policy CP11 of the Core Strategy and: - Preserve the character and appearance of the countryside; and - Not lead to the physical, visual or perceived coalescence of existing settlements The retention of the eastern and western flanks of the site as open green space serve to ensure that the development proposals avoid physical, visual and perceived sense of coalescence with neighbouring settlements. As discussed, and upheld by the Planning inspectorate, Policy CP11 of the Core Strategy is out of date and by virtue of the Council not being able to demonstrate a 4-year housing land supply. Additionally, the Planning Inspectorate considered Policy CP11 to be inconsistent with the NPPF by taking a more restrictive approach to countryside development (see pages 35 & 36 above). The supporting LVIA reaffirms that the locality has the landscape capacity to facilitate the proposed development. Moreover, the proposed development would be visually well contained by robust tree-lined boundary planting, which is to be supplemented and reinforced as

	part of these proposals, which will ensure the development preserves the character of Arborfield.
IRS2: Recognise, Respect and Preserve Identity and Rural Settings of Settlements	Taken as a whole, this policy requires the design of new development to respect and enhance the locality in which it is set. Whilst the final design of the development is to be secured at reserved matters stage, the accompanying DAS details how a considered contextual character analysis has been utilised to inform the nature of development proposed. The density of development has been informed by its context and will be set back from the site boundaries behind strong vegetated buffers. Additionally, large swathes of open space are retained and enhanced throughout the site to ensure the overall character of Arborfield is retained. Overall, it is considered that the site can accommodate the quantum of development envisioned in a manner that respects and enhances the identity of Arborfield.
IRS3: Protection and Enhancement of the Natural Environment and Green Spaces	This policy requires new development proposals to secure a net-gain in biodiversity. Additionally, this policy sets out requirements for development proposals on public open spaces and locally valued natural assets. The application site is not located on a public open space or a locally valued natural asset (see maps L & K on the NP respectively). As such, these elements of the policy are not applicable in this instance. Regarding biodiversity net-gain, by virtue of the requirements of the Environment Act 2021, the proposal will secure a 10% biodiversity net gain. As such, this policy is complied with.
IRS4: Protection and Enhancement of the Historic Character of the Area	As a whole, this policy requires development proposals to protect or enhance the setting of nearby statutory and locally valued heritage assets. The supporting maps included at Appendix 1 of this statement shows that the proposed development is not within the setting of any statutory or locally listed heritage assets. As such, the proposed development complies with Policy IRS4.
AD2: Prioritising Housing for Local Needs	This policy requires new housing development proposals to demonstrate how they contribute a balanced mix of dwelling types and sizes to meet local needs informed by the latest evidence base available. The policy also sets out the preference under which affordable housing is allocated.

	Whilst the final dwelling mix is to be secured at reserved matters stage, these proposals have been informed by the latest housing needs evidence base published by the Council⁶ in support of its Emerging Local Plan. A nominations agreement would be included within any forthcoming S106 agreement that can be utilised, in agreement with the Council, to secure the allocation of affordable housing in the manner championed by this policy.
AD3: High Quality Development With Generous Open Space, Properly Landscaped	This policy requires new development proposals to be of a high-quality design that reflect local distinctiveness, respect the rural nature of the area and recognise the possible impacts of climate change by incorporating suitable sustainability measures. As discussed above, the proposal complies with policy IRS2 which also requires development proposals to reflect and enhance local distinctiveness. As such, facets a) and b) of this policy do not warrant further discussion here. With regards to the sustainability element of this policy, the resulting development will be required to comply with Part L of the Building Regulations which will ensure all new dwellings are energy and water efficient. Moreover, EV charging points will also be incorporated into the final scheme design (to be settled at reserved matters stage and secured via condition). It can therefore be considered that part c) of this policy is also complied with.
AD4: Address Local Flood Risk Management	This policy, taken as a whole, requires development proposals to identify and comprehensively mitigate flood risks. This application is supported by a flood risk assessment which includes a detailed analysis of the site's flood risks from all sources. The findings of this report have been utilised to develop a comprehensive SuDS strategy for the site which includes measures such as attenuation basins, swales, permeable surfaces and on-plot measures – all designed in accordance with Wokingham Borough Council's SuDS strategy. Criteria c) of this policy requires confirmation from water companies during the planning process that capacity exists within their sewerage network to facilitate the development proposal. S106 of the Water Industry Act 1991 sets in legislation a right to connect to existing sewerage networks. As such, it should be taken as read that this element of this policy is complied with by virtue of this legislation. Should any network upgrades be required to accommodate the development, these can be secured via a pre-occupation condition (such was the approach by Wokingham Borough Council in the recent King Street Lane decision LPA Ref: 231094).

⁶ [Wokingham Borough Council Local Housing Needs assessment 2022 \(November 2023\)](#)

	Overall, it is considered that the proposed development comprehensively and effectively manages matters of flood risk and drainage in accordance with this policy.
GA1: Minimise Additional Traffic on Unsuitable Roads	This policy, taken as a whole, requires new development proposals not to result in any adverse highway safety impacts and to enhance pedestrian routes/permeability. The development proposals have been informed by a transport assessment, which includes a road safety audit. This detailed analysis of the local highway network concludes that there is sufficient capacity in the highway network to facilitate the anticipated number of vehicular journeys generated by this development proposal. Additionally, the transport assessment confirms the suitability of the proposed access arrangements from Reading Road. The illustrative masterplan showcases how enhanced pedestrian connectivity between Church Lane and Reading Road have been incorporated within the proposals for the betterment of the area. Such enhanced pedestrian connectivity was highlighted as desirable in the resident responses to the Wokingham Borough LCIW⁷ Through the detailed analysis of the existing highway network, and incorporation of enhanced pedestrian permeability through the site, it is considered that this policy is complied with.
GA2: Implement Local Network of Green Routes for Non-Motorised users	This policy requires new development proposals to not inhibit the delivery of the wider network of Greenways and other PROWs. Development proposals are encouraged to support: - A network of all-weather routes - Safe crossings where PROWs meet primary routes - Better connectivity through the plan area - Creation of opportunities for sustainable transport - Provision of better access to the countryside and amenity destinations There are no PROWs that cross the site, but consideration has been given to how this development can improve access to those nearby – in particular greenway Routes A, F & K, and PROW Ref: ARBO1. As discussed when assessing policy GA1 above, the development proposals include footways linking Church Lane and Reading Road, enhancing pedestrian connectivity through the site, and the wider area in general. New pedestrian access points are proposed in the northwest corner and on the western boundary of the site along Church Road to facilitate safe access to the public transport options on Reading Road. This enhanced permeability results in: - Better connectivity through the plan area

⁷ [Wokingham Borough Local Cycling and Walking infrastructure Plan \(online\)](#)

	- Creation of opportunities for sustainable transport - Provision of better access to the countryside and amenity destinations In short, this development proposal delivers on all applicable aspects of this policy.
GA3: Public Transport Improvements With Long Term Viability	This policy supports improvements to public transport to enhance the long-term viability of development proposals. As is detailed within the supporting transport statement, the site is well serviced by public transport options along Reading Road that provide a regular, sustainable, link to the higher-order settlements of Wokingham and Reading (including their respective rail stations). Subject to meeting the CIL tests, there is scope to secure improvements to these facilities via S106 agreement.

Summary

5.34. The proposal accords with the objectives of the NP when taken as a whole.

Most Important Policies

5.35. Paragraph 11(d) of the NPPF refers to the most important policies for determining applications.

5.36. In this regard, the most important Policies relating to this application relate to housing requirement policies that are listed below:

Core Strategy Policies

- Policy CP1 Sustainable Development
- Policy CP3 General principles for Development
- Policy CP9 Scale and Location of Development proposals
- Policy CP11 Proposals Outside Development limits (including countryside)
- Policy CP17 Housing Delivery

Managing Development Delivery Local Plan Policies

- Policy CC01 Presumption in Favour of Sustainable Development

5.37. Based upon the analysis set out in this Planning Statement, whilst the Application Scheme conflicts with the settlement policy boundaries identified under policies CP9 and CP11, it nevertheless accords with the presumption in

favour of sustainable development at Policies CP1 and CC01

- 5.38. Moreover, and because the Council is unable to demonstrate a four year supply of deliverable housing land, this triggers the presumption in favour of sustainable development at paragraph 11(d) of the NPPF.

Material Considerations

- 5.39. There are a number of material considerations relevant to the assessment of the application, including, but not limited to the following:

- The NPPF
- The PPG
- The National Design Guide
- Wokingham Borough Council SPDs
- Appeal Decisions and Case Law
- Five Year Housing Land Supply
- Affordable Housing Need and Supply
- Emerging Local Plan and its supporting evidence base.

- 5.40. These material considerations are considered below.

National Planning Policy Framework

- 5.41. The National Planning Policy Framework (NPPF) was most recently updated in December 2023. It is a material consideration of particular standing in the determination of planning applications.

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

- The presumption in favour of sustainable development
- Decision making
- Delivering a sufficient supply of homes
- Promoting sustainable transport
- Achieving well-designed places

- Protecting Green Belt land
- Meeting the challenge of climate change, flooding and coastal change
- Conserving and enhancing the natural environment

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

Economic Role

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

5.38. The scheme further addresses the economic role in terms of increased LPA Revenues, Construction impacts (increased GVA, jobs etc.) and increased expenditure in local area.

Social Role

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

Environmental Role

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

Decision Making

5.41. Section 4 of the NPPF sets out the approach to decision making. Paragraph 38 makes it clear that decision-makers at every level should seek to approve applications for sustainable development where possible.

5.42. The Application Site is located in a sustainable location and will improve the economic and social conditions of the area. It will also help to provide public open space and enhanced biodiversity habitats, both on and off site.

5.43. Paragraph 48 refers to the weight to be given to relevant policies in emerging plans according to the stage of preparation and the extent to which there are unresolved objections. In the context of Wokingham Borough, the emerging Local Plan carries limited weight, but the evidence base, where relevant, may itself carry weight.

Delivering a Sufficient Supply of Homes

5.44. Paragraph 60 sets out the Government's objective of significantly boosting the supply of homes.

5.45. Paragraph 61 sets out the approach to determining the minimum number of homes needed, which should be informed by a local housing need assessment conducted using the Standard Method in national planning guidance – unless an alternative approach is justified. It is also added that any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.

5.46. Paragraph 69 sets out the need to provide a five year supply of deliverable sites for housing. It also requires sites for years 6-10 and beyond.

5.47. This Application for up to 111 dwellings would make a material contribution towards the current shortfall in supply.

Promoting Sustainable Transport

5.48. Section 9 sets out the approach to providing for sustainable growth.

5.49. Paragraph 108 requires transport issues to be considered from the earliest stages of development proposals in order to, *inter alia*, identify opportunities to promote walking, cycling and public transport use are identified and pursued.

5.50. Paragraph 109 states as follows.

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

- 5.51. Paragraph 114 requires applications for development to take opportunities to promote sustainable transport modes, achieve safe and suitable access and to mitigate the impacts of trip generation on the highway network.
- 5.52. Paragraph 115 makes it clear that development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety or the residual cumulative impacts on the road network would be severe.
- 5.53. In highway and accessibility terms, the Site is located in close proximity to an identified settlement in the Borough, within walking distance to local services and facilities, and within reach of larger settlements via readily accessible public transport. The supporting TS also demonstrates the acceptability of the Scheme in sustainability and highway terms, concluding in relation to the acceptability of the trip rates from the proposal upon the highway network. Accordingly, the Scheme is consistent with section 9 of the NPPF.

Achieving Well-Designed Places

- 5.54. Section 12 of the NPPF sets out the aspirations for well-designed places, requiring beautiful and sustainable buildings.
- 5.55. The desire for well-designed places requires careful consideration of what makes ‘the place’ and how schemes can be designed to embrace the building beautiful agenda.
- 5.56. One element of well-designed places includes the requirement for landscape-led masterplans and provision of tree-lined streets.

- 5.57. As set out at paragraph 139 of the NPPF, development reflecting local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides attracts significant weight.
- 5.58. The accompanying DAS explains the appropriateness of the overall design response in the content of the design approach advocated in the NPPF and the Council's design guides and policies.

Meeting the Challenge of Climate Change, Flooding and Coastal Change

- 5.59. Section 14 sets out the approach to supporting the move towards a low carbon future as well as the approach to the management of development and flood risk.
- 5.60. These requirements are addressed by virtue of the resulting development's requirement to comply with Part L of the Building Regulations and the Flood Risk Assessment and Drainage Strategy.

Natural Environment

- 5.61. Section 15 sets out the approach to conserving and enhancing the natural environment.
- 5.62. Paragraph 186 states that planning policies and decision should contribute to and enhance the natural and local environment including by *inter alia*, protecting and enhancing valued landscapes in a manner commensurate with their statutory status or identified quality in the development plan.
- 5.63. Paragraph 186 sets out the approach to avoiding significant harm to biodiversity when determining planning applications.
- 5.64. The supporting technical work confirms that the Application Site is not a valued landscape, and the Scheme results in an overall net gain in biodiversity.

Government Announcements July 2024

Written Ministerial Statement (July 2024)

- 5.65. On the 30th July 2024, the Deputy Prime Minister, made a Written Ministerial Statement (“WMS”) in which announcements were made about the government’s intentions to make changes to the planning system to significantly boost the delivery of housing:

“We are in the middle of the most acute housing crisis in living memory. Home ownership is out of reach for too many; the shortage of houses drives high rents; and too many are left without access to a safe and secure home”

“We are therefore reversing last year’s changes which loosened the requirement for local authorities to plan for and meet their housing needs, and we are going further still, by mandating that the standard method is used as the basis for determining local authorities’ housing requirements in all circumstances.”

“We are therefore updating the standard method and raising the overall level of these targets – from around 300,000 to approximately 370,000”

“It is however also clear that brownfield land can only be part of the answer, and will not be enough to meet our housing needs”

“But we cannot wait for all release to come through plan making. Where authorities are under performing – be that lacking a sufficient land supply or failing to deliver enough homes as measured by the Housing Delivery Test – we will therefore also make it clear that applications for sites not allocated in a plan must be considered”

- 5.66. Paragraph 6 of the NPPF confirms that Written ministerial Statements are a material consideration. The weight to be attached to that of the Deputy Prime Minister, as cited above, has been discussed in numerous recent appeal decisions such as the Moggie Lane appeal decision⁸ in which the Inspector, at paragraph 4, said:

⁸ PINS Ref: APP/R0660/W/24/3339806

“a direction of travel has been outlined within the Written Ministerial Statement, which is a material consideration of very significant weight” (our emphasis)

5.67. The Application should be considered in this context.

NPPF - Consultation Changes

5.68. On the same day the Deputy Prime Minister, Angela Rayner, issued her WMS the Government also published draft revisions to the NPPF⁹ alongside a consultation exercise which sets out how it intends to boost housing delivery.

5.69. Amongst the changes proposed are the reinstatement of the mandatory requirement to maintain a 5-year housing land supply regardless of the age of an authority's development plan or its progress with adopting a new development plan.

5.70. Perhaps most pertinent is the proposed revision to the Standard Method for calculating housing need (which is also intended to be the mandatory method for identifying housing need instead of its current status as an optional starting point). Based upon the calculations published by the Government¹⁰ as part of this NPPF consultation exercise, the proposed revisions to the Standard Method would see Wokingham's annual housing need increase from 748 dpa to 1,308 dpa (a 74.8% increase).

5.71. As confirmed within the Autumn Budget¹¹, at paragraph 3.22, the Government stated it will:

“continue to take action to ensure that the planning system supports public and private investment. This includes:
- **Responding to the National Planning policy Framework consultation before the end of the year to confirm pre-growth reforms to the planning system”**
(our emphasis)

⁹ [Gov.uk – proposed reforms to the National Planning policy Framework and other changes to the planning system](#)

¹⁰ [Gov.uk – proposed reforms to the National Planning Policy Framework and other changes to the planning system: Outcome of the proposed revised method](#)

¹¹ HM Treasury: Autumn Budget 2024 – Fixing the Foundations to Deliver Change (October 2024)

- 5.72. It is clear that significant changes to national planning policy are forthcoming imminently. Until such time as the NPPF is adopted, the consultation draft carries only limited weight.
- 5.73. This is important given the Council are currently consulting on a Regulation 19 Draft Local Plan with the Local Development Scheme¹² outlining its anticipated submission for examination in public by December 2024 – January 2025. However, the policies and housing target (795 dpa) therein carry only limited weight until the plan is adopted.
- 5.74. Should the Draft NPPF, and associated revised standard method, be adopted in their current formats, the Council will be required to demonstrate a full 5-year housing land supply against a revised standard method housing requirement of 1,308 dpa until such a time as the Draft Local Plan is adopted. The need for a 5% buffer will also be reinstated and previous over-supply will not be considered.
- 5.75. The table below compares and contrasts the current and emerging land supply positions under the current and draft versions of the NPPF:

NPPF Version	Land Supply Requirement (Years)	Housing Requirement (dpa¹³)	Current Supply (dwellings)	Land Supply Position (years)
Current	4	748	2,545	3.4
Draft	5	1,308 ¹⁴	2,545	1.9

- 5.76. The table above highlights the stark land supply position faced by Wokingham. The Government is clear that its objective is to significantly boost housing

¹² [Wokingham Borough Council Local Development Scheme 2024-2027 \(September 2024\)](#)

¹³ Calculated using the current version of the Standard Method

¹⁴ This excludes any buffer and is therefore a minimum

delivery and is committed to issuing a revised NPPF by the end of 2024 to enable this objective.

- 5.77. The Applicants reserve the right to update their assessment of the five-year housing land supply position during the consideration of the application and pursuant to publication of the revised NPPF (expected end of December 2024).

Wokingham Borough Council

- 5.78. There are also a number of supplementary planning documents and development management advice notes which represent material considerations in the determination of the Application.

- 5.79. Those relevant to determining the Application comprise as follows:

- Borough Design Guide (2012)
- Arborfield & Newland Village Design Statement (2015)
- Highways Design Guide (2019)
- Open Space, Sport and Recreation Facilities Strategy (2013)
- Infrastructure Delivery & Developer Contributions SPD (2011)
- Sustainable Design & Construction SPD (2010)
- Climate Change Interim Policy Position Statement (2022)
- First Homes Interim Policy Statement (2022)
- CIL Charging Schedule (2015)

- 5.80. The content of the documents and the Application's conformity with them is set out below.

Borough Design Guide (2012)

- 5.81. The main document provides a character overview of each of the main settlements within Wokingham. It provides detailed guidance on how to undertake an initial site appraisal, and in respect of the general aspects of design which development proposals should consider. Reference has been made to this document during the evolution of the design proposals for the site.

- 5.82. The Application Scheme responds to the requirements of this SPD through the careful attention the scheme design.

Arborfield and Newland Village Design Statement (2015)

- 5.83. The village design statement provides a more localised appreciation of the character areas within Arborfield and Newland Village, identifying the key characteristics of each settlement.
- 5.84. The design statement identifies the development along Church Lane, Walden Avenue and Swallowfield Road, which all define the immediate context of the application site, as comprising the settlement of Arborfield. As such, whilst matters of design are reserved for later determination, regard will be had to the key characteristics of Arborfield as identified within the design guide (or any subsequent superseding guidance).
- 5.85. The supporting DAS has had regard to the design statement and has informed the illustrative masterplan. It is considered the proposed development accords with the guidance within the design statement.

Highway Design Guide (2019)

- 5.86. The main document provides guidance on the key principles to follow when designing highway layouts for new developments. The document also sets out the philosophy for all new development, requiring the following principles to be considered:
- The local character and context of the area
 - The movement and place function of a development site
 - The hierarchy of travel modes, involving the promotion of sustainable modes of travel above private motor vehicles
 - The creation of sustainable developments and communities
 - Quality public realm in association with Green Infrastructure.
- 5.87. Whilst the internal highway layout is for determination at a later date, the supporting Transport Statement details how the key principles and philosophies of this guidance have manifested themselves in the resulting access design.

Open Space, Sport and Recreation Facilities Strategy (2013)

- 5.88. This document sets out the Council's strategy for securing on and off-site provision of open space, sports and recreation facilities. Amongst other things, this document sets the standards for which each must be provided against. Whilst the design is to be fixed at reserved matters stage, the accompanying illustrative masterplan (drawing no. 052403-DAN-MP01) shows how the requisite open space provision can be facilitated within the proposed development.

Infrastructure Delivery & Developer Contributions SPD (2011)

- 5.89. The Development Contributions SPD confirms that contributions towards the infrastructure required as part of new developments will be collected via CIL, with planning obligations still be used to collect contributions towards affordable housing and SAMM (where applicable).

CIL Charging Schedule (2015)

- 5.90. CIL will be chargeable on the net additional floorspace (gross internal area) of all new development apart from those exempt under Part 2 and Part 6 of the Community Infrastructure Levy Regulations 2010 (as amended by the Community Infrastructure Levy Regulations 2011).
- 5.91. The 2015 rate for Residential Dwellings (C3) in the charging schedule is £365 per sq.m.

Sustainable Design & Construction SPD (2010)

- 5.92. This SPD clearly sets out the Council's agenda on sustainable design and construction. the first part of the document focuses on sustainable design, whilst the latter part focuses on sustainable construction methods.
- 5.93. Part L of the Building Regulations requires a higher level of sustainable design and construction compared to this SPD. As such, it is considered that all proposed dwellings will comply (or exceed) the requirements of this SPD.

Climate Change Interim Policy Position Statement (2022)

- 5.94. This Interim Planning Policy Position Statement sets out the position of Wokingham Borough Council on the issue of climate change when assessing planning applications. The Statement is not in itself planning policy and is not part of the statutory Development Plan. It is an explanatory document, emphasising that the Climate Emergency is a key material consideration when assessing planning applications.
- 5.95. Details on how the Climate Emergency has influenced this proposal is contained within the supporting flood risk assessment and drainage strategy.

First Homes Interim Policy Statement (2022)

- 5.96. This statement serves as an Interim Policy Statement for Wokingham Borough Council on the new First Homes policy. It summarises some key details of the policy change and seeks to outline the position of and effect on Wokingham Borough Council of the change.
- 5.97. The proposal will provide a policy compliant 40% (44 units) of affordable housing. The tenure mix is yet to be agreed with Wokingham Borough Council but it is anticipated that a policy compliant mix will be secured via S106 Agreement.

Housing Land Supply

- 5.98. The current iteration of the NPPF, through the provisions of paragraphs 77 and 226, the Council is only required to demonstrate a 4-year housing land supply.
- 5.99. As set out below, the Council is **unable to demonstrate a four year supply of deliverable housing land**, with the Council purporting to be able to show a maximum supply of 3.2 years as of 31st March 2023¹⁵. This is also confirmed in the recent Trowes Lane³ and Orchard Road² appeal decisions.

¹⁵ [Wokingham Borough Council Five Year Housing Land Supply Statement at 31st March 2023 \(January 2024\)](#)

- 5.100. The Council have also recently acknowledged that this shortfall is unlikely to be resolved until the adoption of the Draft local Plan with Officers stating in paragraph 124 of their committee report for the recent Land off Langley Common Road, Arborfield, Wokingham (LPA Ref: 232490):

**“the current housing land supply shortfall will likely remain
until the new LPU is adopted”**

- 5.101. Although the Council has consulted upon a Regulation 19 Draft Submission Local Plan, there remains uncertainty that the anticipated timeline within the Local Development Scheme (LDS) for adoption of this plan will be achieved. This is because the submission of the new Local Plan, envisaged for winter 2024, has yet to occur and the subsequent timeline through to the envisaged adoption date in May 2026 is optimistic, especially when compared to that achieved on other strategic plans prepared under the 2018 and subsequent editions of the NPPF.
- 5.102. As such, there is uncertainty of the timeline of the emerging Local Plan. This means that there is no short-term mechanism to resolving the very substantial housing land supply deficit and this consequently contributes towards the presumption in favour of sustainable development of the Site.

Affordable Housing

- 5.103. The Berkshire and South Bucks SHMA (February 2016), prepared jointly by the Council and the other Authorities in Berkshire, quantifies the Borough's affordable housing needs. This indicated an annual net need (2013-36) for 441 affordable dwellings (Table 81) and can be compared with the overall assessed need for 856 homes annually (Table 139). Seeking 441 affordable homes annually therefore represented 51.6% of the total housing need for the Authority over the period 2013 to 2036. This contrasts with a requirement of a minimum of between 20% and 40% (and up to 50%) in Core Strategy Policy CP5 – as the application site is green field and exceeds the threshold for major development in the NPPF, 40% affordable is required.
- 5.104. Since the publication of the SHMA, the Authority has undertaken a further appraisal of affordable housing need. This is with the Local Housing Need

Assessment prepared by Opinion Research Services in November 2023¹⁶. This provides an appraisal of affordable housing need alongside the calculation of the overall Local Housing Need figure derived from the PPG (ID ref 2a-004-20190220). This document indicates that over the envisaged emerging Local Plan period for 2018-40, an annual average of 352 affordable homes would be required (paragraph 5.60), which is 45.5% of minimum Local Housing Need figure of 781dpa identified in the same paragraph.

5.105. Alongside the consideration of affordable housing need within the SHMA and the LHNA, it is also important to review changes in the Council's Housing Register over the period since the base date of the SHMA. This indicates a significant unmet need for affordable homes in the Borough which whilst recognised in the appraisals of the LHNA has continued to grow (as addressed in the next section).

5.106. The table below indicates the changes to the Council's housing register since 2013. To join the Council's Housing Register, applicants must accord with the criteria as detailed in the Council's "Housing Allocations Policy" (2022).

Comparison of Housing Register Changes in Wokingham Borough¹⁷

	1/4/13	1/4/14	1/4/15	1/4/16	1/4/17	1/4/18	1/4/19	1/4/20	1/4/21	1/4/22	1/4/23
Number on housing register	2,274	2,417	1,622	1,527	1,702	1,613	1,498	1,510	2,086	2592	2420
Those in a reasonable preference category	1,000	1,000	900	405	425	334	77	103	255	634	221
Homeless	20	20	27	65	44	20	33	45	46	43	49

5.107. The extent of the continued growth in the need for affordable housing is further confirmed in the Housing Facts and Figures Report – this indicates that at 30th September 2021, there were 2,450 households on the housing register, an increase of 364 households compared to the end of the financial year as

¹⁶ [Wokingham Borough Council: Local Housing Needs Assessment 2022 \(November 2023\)](#)

¹⁷ Data obtained from <https://www.gov.uk/government/collections/local-authority-housing-data>.

indicated in the table above. This is a 17% increase in the size of the Council's housing register in just 6 months. A further FoI Response indicates that at 15th August 2022, the Council's housing register stood at 2,489 households. This is a further increase on the figure at 30th September 2021 and that within the above table for 1st April 2021.

- 5.108. When this is compared to the scale of demand illustrated in the above table, it is clear that there have been around 1,500 households on the Council's housing register for the five years from April 2015 to 2020 but that this has worsened in recent years. Therefore, insufficient new affordable homes have been completed in the Borough to off-set the increased demand for such properties which has resulted in the size of the register remaining broadly constant. Therefore, to make an effective contribution towards addressing the requirements of households as indicated on the Borough's housing register, it is essential that further affordable homes are delivered, as envisaged on the appeal site.
- 5.109. As indicated in the Table below¹⁸, the Council has delivered 2,332 affordable homes in the period April 2013 to March 2023. This is equivalent to an annual average rate of 233.2 affordable dwellings since 2013.
- 5.110. Alternatively, in the period since the start of that appraised in the Local Housing Need Assessments (2023), there have been 1,980 affordable homes completed, which is 668 dwellings less than that required to address its appraisal of affordable housing need (407dpa: 2018/2022 - 358dpa 2022/2023).

¹⁸ [Wokingham Borough Council Affordable Housing Topic Paper \(Figure 4\)](#)

Net delivery of affordable homes in Wokingham Borough 2013-23

Year	Affordable Housing Completions	SHMA		LHNA	
2013/14	108	441	-333		
2014/15	95	441	-346		
2015/16	123	441	-318		
2016/17	212	441	-229		
2017/18	482	441	41		
2018/19	365	441	-76	352	13
2019/20	446	441	5	352	94
2020/21	187	441	-254	352	-165
2021/22	189	441	-252	352	-163
2022/23	129	441	-312	352	-223
Total	2,336	4410	-2,074	1980	-444

5.111. The table above paints quite a stark picture of affordable housing delivery in Wokingham across the last decade. Against the needs identified in the SHMA, the Council has managed to only deliver 53% of identified need, resulting in a shortfall of 2,074 affordable homes. Since the publication of the LHNA the picture is similar with only 1,307 affordable homes being delivered against a requirement of 1980. Whilst a slightly more positive delivery percentage of 66%, this is still a significant shortfall against identified needs.

5.112. The extremely poor delivery of affordable housing in 2021/22 has continued into 2022/23 as indicated in the above Table. This has consequently had significant impacts upon the ability to resolve the Borough's housing needs as illustrated by the changes in the housing register.

Affordable Housing Shortfall

5.113. The appraisal in the SHMA identified that 441 net affordable homes were required annually within the context of an overall need of 856 dwellings (or 52%). Alternatively, the Council's Local Housing Need assessment (November 2023) calculated that the annual need for affordable homes in Wokingham

Borough 2018-40 is for 352 units (or 45.5% of the Local Housing Need figure of 781 dwellings).

- 5.114. It is consequently clear that there is a very significant need for affordable homes in Wokingham Borough. Furthermore, as envisaged in paragraph 60 of the NPPF, it is essential that sufficient housing is delivered to ensure that the “needs of groups with specific housing requirements are addressed”. This therefore includes providing for the full annual need of at least 407 affordable units as appraised through the Local Housing Need assessment, since paragraph 63 of the NPPF is clear that affordable housing comprises one of those groups with a specific housing requirement.
- 5.115. Compared to the assessed need for affordable homes in the SHMA, between April 2013 and March 2023 under-delivery has so far reached 2,078 dwellings (Table 7). In percentage terms, this represents a 47.1% shortfall against assessed needs during this period, a serious gap in provision which affects Wokingham Borough and how its effective economic and social functioning).
- 5.116. Furthermore, when reviewed in comparison to the existing policy requirement (Core Strategy policy CP5) (minimum of 20 - 40% affordable housing (typically at least 35%)), the 52% expectation of the SHMA and 45.5% expectation in the LHNA, the Council has seriously under-delivered on affordable homes. This is confirmed by the proportions of affordable homes completed in the Borough as detailed in the Table above.
- 5.117. The ability to contribute towards addressing the very significant under-delivery of affordable housing through this scheme is an important benefit associated with the proposal that attracts significant and substantial weight.

Future affordable housing supply

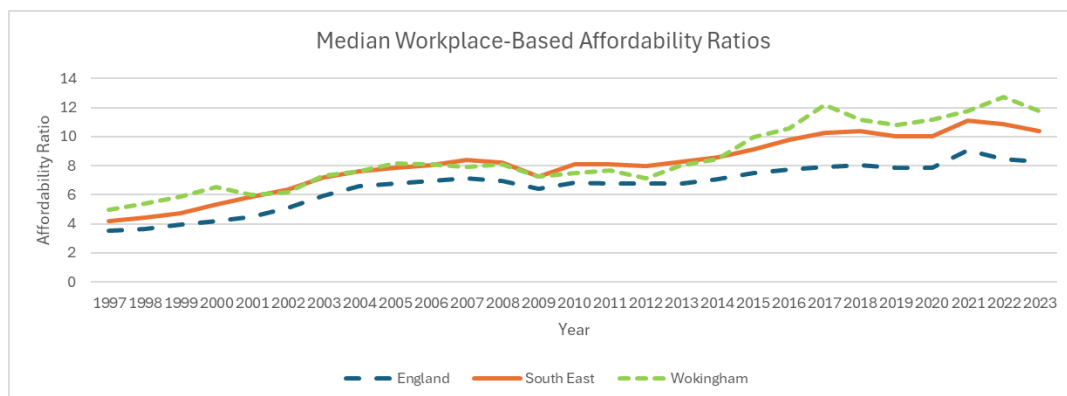
- 5.118. The future delivery of affordable housing in Wokingham Borough is highly uncertain. In addition to the shortfall, there is also the question of whether future needs will be met. The risks of not meeting these needs are heightened by the fact that any future housing supply delivered through permitted development conversions is exempt from affordable housing, and on brownfield sites, the affordable housing potential is tempered by vacant building credit. This has the

potential to make the situation even more severe, not just for Wokingham Borough's vulnerable position on affordable housing land supply, but for the significant number (1,160) of households on the Council's Housing Register as of July 2024¹⁹.

5.119. Whilst the Council's five-year land supply assessment at 31st March 2023 (published January 2024) indicates that affordable homes are expected on a number of the sites listed, there is no information of the total number of such units still to be completed or their expected delivery rate. Therefore, there is no guarantee that existing permissions will provide sufficient homes to address continuing annual need for 352 affordable dwellings (assessed in the Local Housing Need Report) together with the 1,160 households on the Housing Register.

5.120. The concerns in the Housing Facts and Figures Report (section 3) that increasing construction and labour costs has impacted and remains an issue for future delivery is a further factor indicating that insufficient affordable homes will be forthcoming.

5.121. The failure to meet the identified needs of affordable housing is a dire situation indicating that the Authority is not fulfilling the objectives in paragraph 61 of the NPPF. The continued under delivery of affordable housing, has contributed to the worsening of the affordability ratios in the Borough as indicated in the chart below.



¹⁹ Table 6 of the Wokingham Borough Council Affordable Housing Topic Paper (September 2024)

5.122. The chart also shows that affordability ratios in Wokingham Borough have more than doubled between 1997 and 2023, and whilst they were below those of the South East region from 2001 to 2014, they are now back above them. This doubling in the affordability ratio has occurred because of a failure to deliver sufficient homes to meet market and affordable need in the Borough. This is illustrated by the extent that the affordability ratio of the Borough has remained above those for England and the Region. Consequently, it is essential that further increases in house building occurs to improve affordability, especially given the continual under-delivery in supply.

5.123. A step change in the delivery of affordable housing is therefore required if the Council is to get anywhere near the accepted identified need in the SHMA or the Local Housing Need Assessment and begin to address the dysfunctions of the local housing market. Such a step change would be consistent with the thrust of paragraph 60 of the NPPF, to boost significantly the supply of homes.

Weight attributable to affordable housing in planning decisions

5.124. The importance of affordable housing as a material consideration is reflected in a number of Secretary of State (SoS) and Planning Inspector decisions. A consistent theme is the significant amount of weight which is attached to affordable housing relative to other material planning considerations in the planning balance.

5.125. It would be possible to reference and highlight numerous appeal decisions over the past few years that highlight the importance affordable housing delivery, even in the context of the Council being able to demonstrate the requisite housing land supply position (which they cannot). The appeal decision for Land North of Nine Mile Ride, Finchampstead (dated 9 April 2020²⁰) is a particularly good example of this. However, in the interest of reflecting the most up-to-date position in the Borough, decisions from 2024 are referenced below.

5.126. First, the planning Inquiry appeal decision for Land West of Trowes Lane²¹ in which the Inspector, at paragraph 55 of their decision, stated:

²⁰ LPA ref 181685 or PINS ref APP/X0360/W/19/3238048

²¹ PINS REF: APP/X0360/W/24/3340006

“a number of benefits would flow from the appeal scheme. The most important would be the provision of 81 new dwellings...Forty percent of the dwellings would also be affordable housing tenures. I was presented with evidence at the inquiry which showed there to be a real problem of affordability in the area, with a persistent unmet demand from those unable to afford housing on the open market. The scheme would help to address that need. I give both these benefits substantial weight” (Our emphasis)

5.127. The same sentiment, conclusion and weighting was shared by the Inspector at the recent Orchard Road, Hurst appeal decision²² in which the inspector stated, at paragraph 87 of their decision:

“A further aspect for support for the scheme was the delivery of affordable housing. Again in the Statement of Common Ground it was agreed that there was a persistent unmet need for this in the Borough, and substantial weight should be given to its delivery. I accept that the nature of house prices in Wokingham Borough means there will be an on-going demand for affordable housing...I have no basis to differ from the parties’ agreed position.”

5.128. What is pertinent to note from the Orchard Road decision is that the persistent unmet need was acknowledged and agreed by the Council. Moreover, the Council agree that substantial weight should be attributed to the delivery of affordable housing.

5.129. The decisions above emphasise the great weight to be attached to the provision of affordable housing in the consideration of planning applications and appeals. The appropriateness of attributing great weight to the benefits of affordable housing has also been accepted by the Courts.

5.130. Some of the key points that arise from these examples are that:

- Affordable housing is an important material consideration;
- Affordable housing can be considered in its own right;

²² PINS Ref: APP/X0360/W/24/3342812

- The importance of unmet need for affordable housing being met; and
- Even where there is a requisite housing land supply, material benefits arising from affordable housing can still justify the grant of planning permission despite harm/development plan policy conflicts.

5.131. It is evident from the housing context that Wokingham Borough Council has underdelivered against its development plan requirements and strategies. National policy, and Secretary of State and Inspector decisions, highlight the importance of the delivery of new affordable homes. Within Wokingham Borough there has been clear under delivery of affordable homes against identified levels of need resulting in a significant backlog of affordable homes. Future supply of affordable housing reinforces the position that there is an acute shortage of affordable homes against significant levels of need.

5.132. In all respects substantial weight should be attached to the benefit of providing additional new homes in Wokingham Borough through this application.

The Emerging Wokingham Borough Local Plan

5.133. As mentioned above the Council is in the process of reviewing and updating its Local Plan.

5.134. The Council has recently concluded a Regulation 19 consultation exercise and is now considering the representations made ahead of submission for examination by the Planning Inspectorate in December 2024.

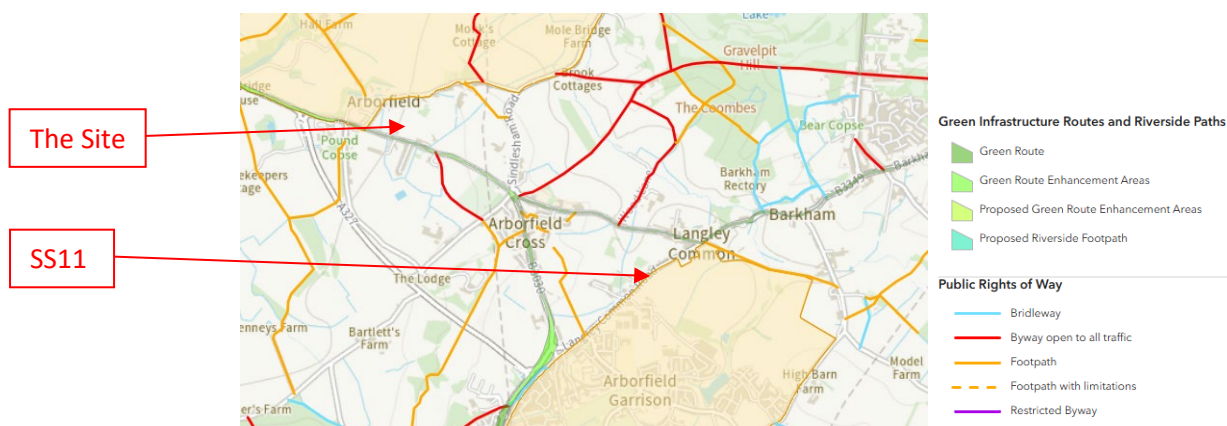
5.135. The Regulation 19 Draft Local Plan is intended to cover the period 2023-2040 and uses the Standard Method as of the 1st April 2023 to calculate the housing requirement for Wokingham. This resulted in an annual housing requirement of 795 dpa (or 12,763 across the 17-year plan period).

5.136. The Draft Local Plan acknowledges at Table 1 therein, that without further land releases, Wokingham cannot meet its identified housing needs, due to a deficit of approximately 4,439 dwellings across the plan period.

5.137. To remedy this chronic shortfall (of which the effects are being felt now) and meet future demand, the Council are proposing a number of Strategic Development Locations (SDLs); these include Arborfield Green, South Wokingham and the Loddon Valley Garden Village.

5.138. The Arborfield Green SDL and Loddon Valley Garden Village are of particular relevance to this application, given their proximity to the Site.

5.139. The Arborfield Green SDL is a long-running redevelopment of the former Arborfield Garrison site. The existing allocation in the adopted Development Plan is to be carried forward to continue as a future source of supply. Policy SS11 of the Draft Local Plan highlights the wide range of services and facilities that are to be delivered as part of this scheme (including but not limited to; a new primary school as well as new cultural, health, employment and leisure facilities). The Council's online mapping tool confirms that the Site is linked to the Arborfield Green SDL by the existing network of Green Routes:

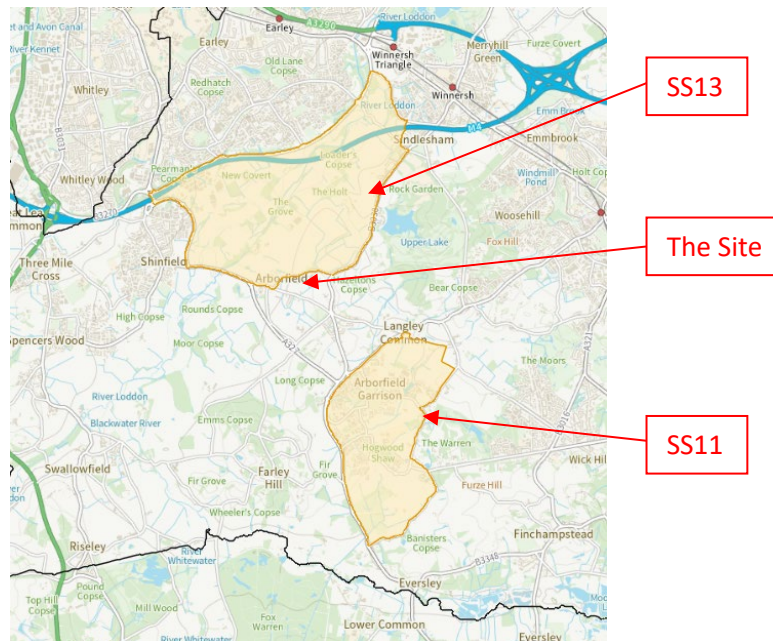


5.140. In addition, it is proposed to allocate the new Loddon Valley Garden Village, detailed in Policy SS13 of the Draft Local Plan. This will deliver:

- Approximately 3,390 dwellings (with 2,700 expected prior to 2040)
- 2 x three-form entry primary schools
- An eight-form entry secondary school
- A new district centre and two local centres providing retail, leisure, employment, cultural and health uses.
- A multi-functioning country park accessible to those outside the Garden village
- A new SANG

5.141. For context, an extract of the Council's online interactive map for the emerging local plan shows the relationship between these strategic developments and the application site. It is less than 2km by road to the Arborfield Green Site from

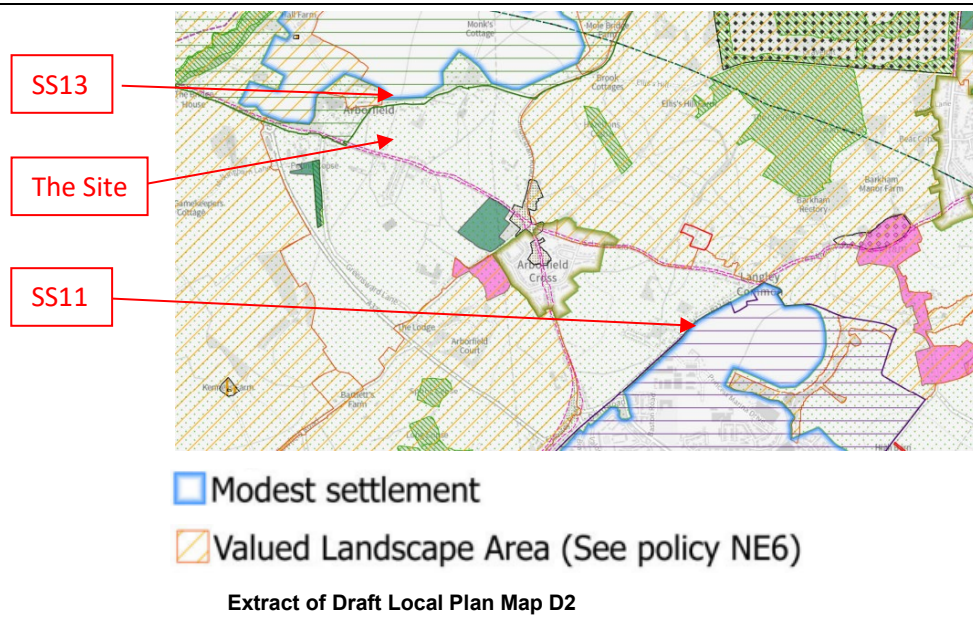
this application Site, with pedestrian pavement available for the full extent of the journey.



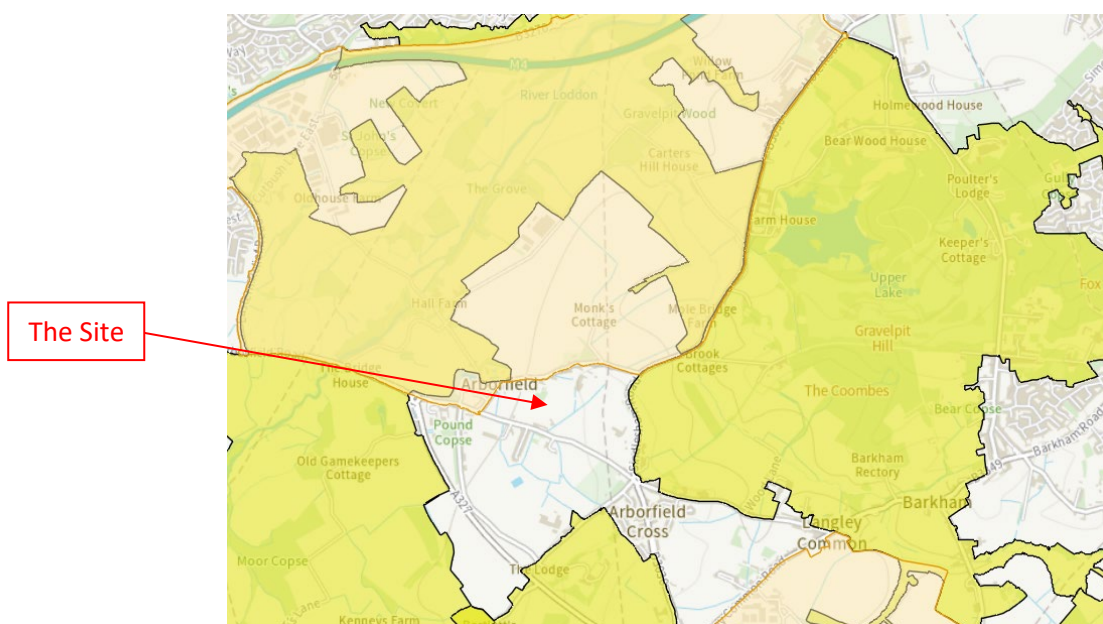
Extract of the Council's Online Emerging Local Plan Policies Map (Accessed 20/11/2024)

- 5.142. Whilst the submitted Transport Statement reaffirms the sustainability credentials of the application site at present, it is clear that the level of services and facilities in proximity to the site are envisioned to increase over the short-medium term.
- 5.143. When presenting to the Council's Planning committee on the 13th November 2024²³, Council Planning officers reiterated to members that the Arborfield Garrison allocation is a live development and, even though not fully constructed, the services and facilities which have been planned and will come forward, are material considerations.
- 5.144. The close relationship between the application site and the proposed SS11 and SS13 developments is clearly shown on supporting Map D2 of the Draft Local Plan:

²³ Application Ref: 232490 – Recommended for approval and unanimously approved by members



5.145. The extract above also highlights that these strategic allocations are intended to be modest settlements in their own right, enhancing the sustainability credentials of Arborfield. Moreover, it shows that the Loddon Valley Garden Village (SS13) is largely considered to be within a valued landscape meaning development would need to be focused eastward, towards the application site, to avoid significant impacts upon this valued landscape. This is best shown on the extract below taken from the Council’s online mapping tool. As can be seen from that image, this application Site is one of very few parcels of undeveloped land in the surrounding area which is not considered, by the Council, to form part of a “valued landscape”.





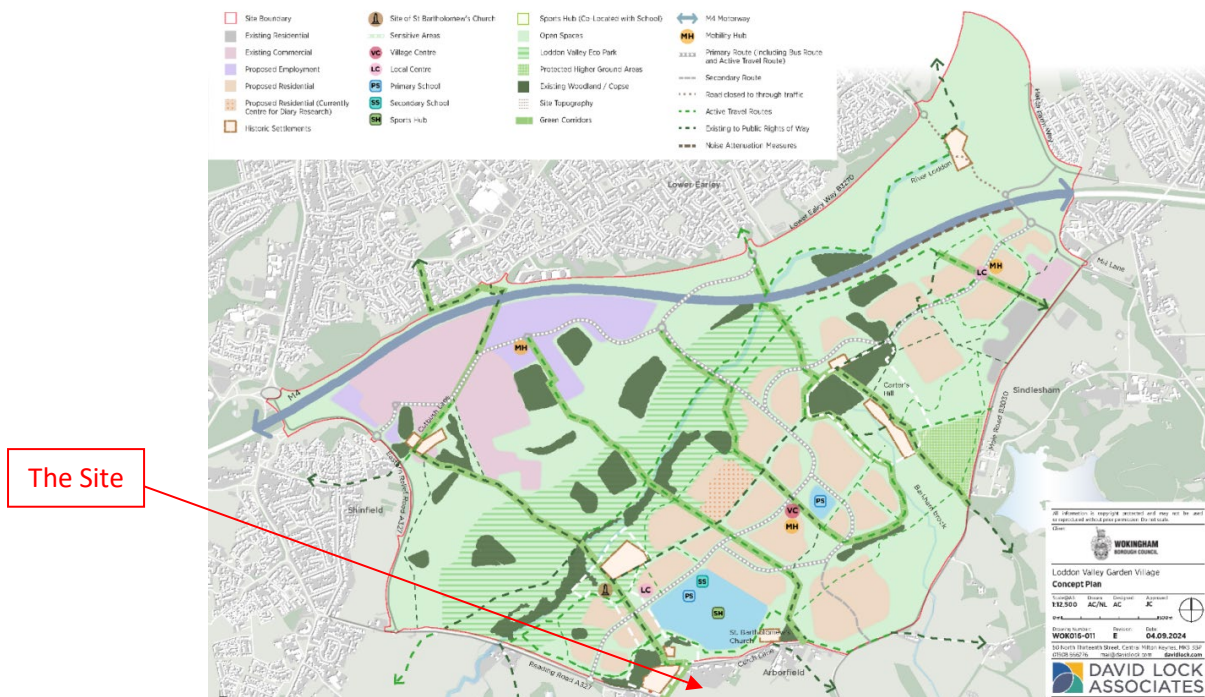
Valued Landscape



Strategic Development location

Extract of the Council's Online Mapping Tool

5.146. Such a direction of developmental travel has manifested itself in the concept masterplan for SS13 included at Figure 8 of the Draft Local Plan which focuses built form towards the locality of the application site:



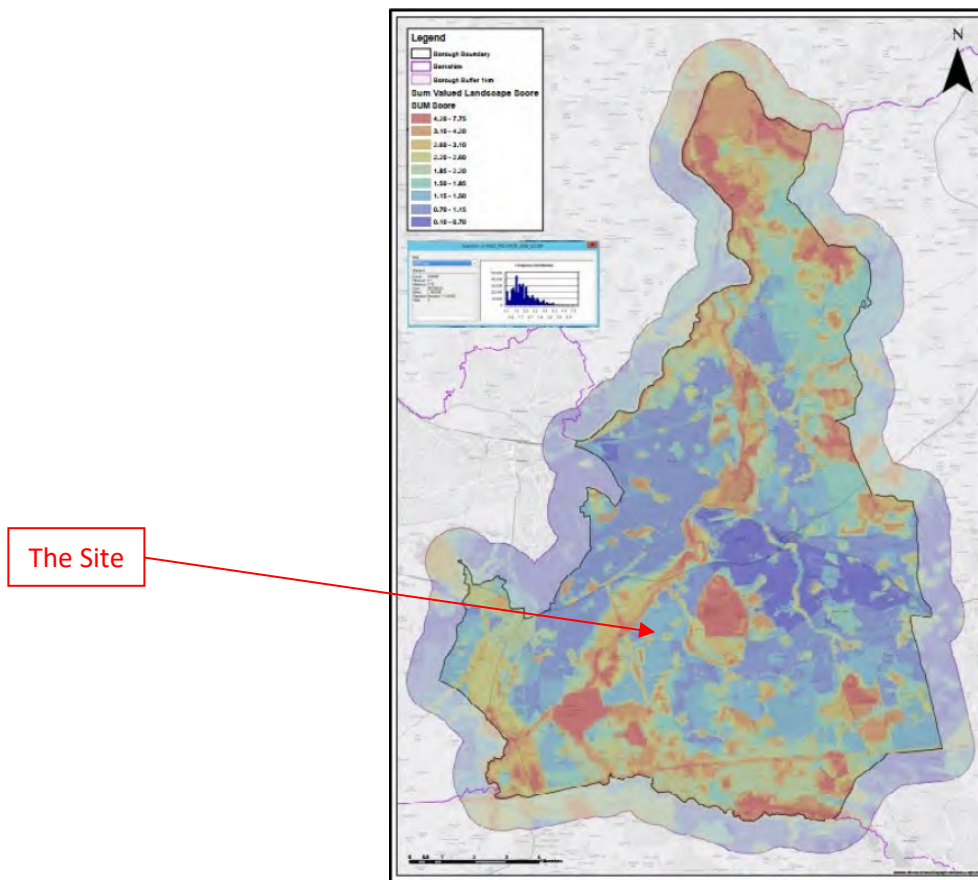
Extract of Figure 8 of the Draft Wokingham Borough Council Local Plan 2023-2040

5.147. Whilst the Draft Local Plan only carries limited weight at this juncture, the evidence base used to underpin the proposed policies and site allocations therein do carry weight in the planning balance.

5.148. The Valued Landscape Assessment²⁴ produced in support of the Draft Local Plan is a material consideration. The Council's consultant team undertook a detailed and iterative assessment of the landscape value of the Borough. To determine the boundaries of these areas of landscape value, attribute and value data were layered on top of each other to identify 'hot spots'. The 'heat map' at Appendix 2 of the Valued Landscape Assessment shows that the application site is one of the very few sustainable locations where additional

²⁴ [Wokingham Borough Council Valued Landscape Assessment \(September 2024\)](#)

housing land could be delivered on land which is free of this landscape constraint.



Extract of Appendix 2 of the valued Landscape Assessment (2024)

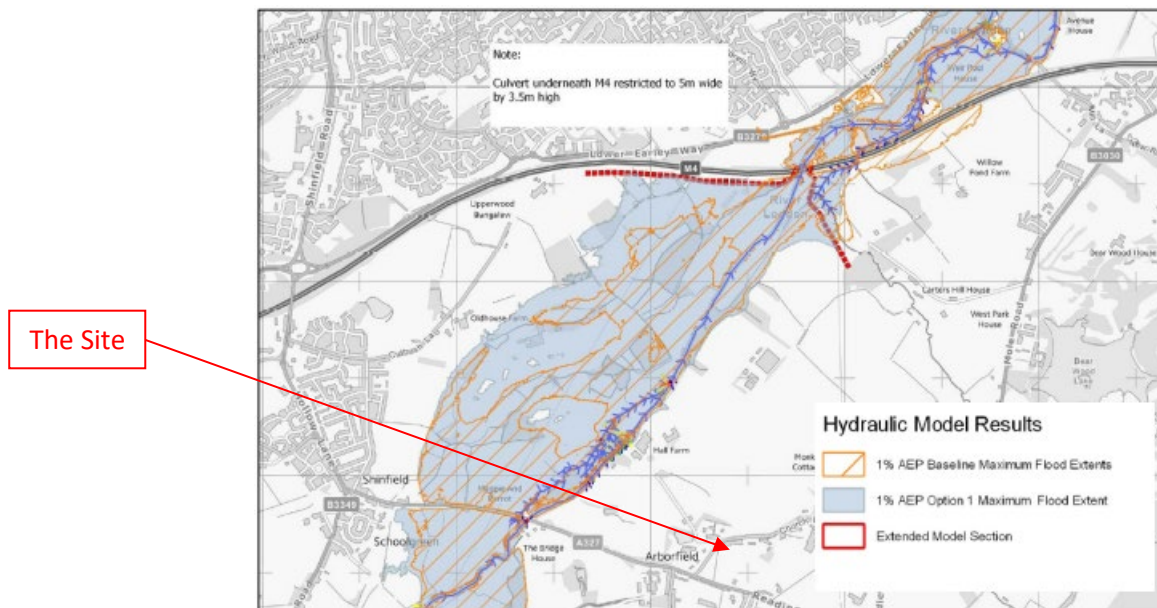
5.149. In a similar vein, the supporting Level 2 Strategic Flood Risk Assessment²⁵, when considering the proposed Garden Village development (referred to as the Hall Farm site therein) states:

“Since a large proportion of the Hall Farm site lies within the River Loddon floodplain it would be inappropriate to locate any significant built development within this area.”

5.150. Whilst the document also acknowledges proposed flood defences in the form of a box culvert in the River Loddon, a 2m high flood bund running parallel to the M4 for 1km, a 0.5km bund separating the Barkham Brook and River Loddon, development should avoid areas outside the current 1 in 100 annual

²⁵ [Wokingham Borough Council Local Plan Update: Level 2 Strategic Flood Risk Assessment \(November 2021\)](#)

probability floodplain. The area identified for exclusion is shown shaded blue on figure 10-1 of the report (extracted below):



Extract of Figure 10-1 of the Council's Level 2 Strategic Flood Risk Assessment

- 5.151. The extract above further demonstrates that, if meaningful expansion is to happen in the manner envisioned by the Draft Local Plan, development needs to shift eastwards towards, and including, the Application Site.
- 5.152. The Council's Infrastructure Delivery Plan²⁶ that supports the Draft Local Plan also highlights a number of projects within the vicinity of the application site (and Borough wide for which localised provisions could be made) for which no sources of funding have been identified. These include, but are not limited to:

Project Name	Need	Cost
LCWIP: A327 from Borough boundary to School Road, Arborfield Cross	Critical	£267,840
A327 Corridor: Improvements to the Leopard 3 bus route from Wokingham to Reading	Critical	£5.76m
Borough-wide bus stop enhancement programme	Essential	£1.44m

- 5.153. Any subsequent development contributions will be subject to CIL Regulations but it is considered that they, and any associated S106 contributions, secured

²⁶ [Wokingham Borough Council Infrastructure Delivery Plan \(September 2024\)](#)

from the development can make a meaningful contribution to the critical and essential unfunded projects identified above.

- 5.154. To conclude on matters relating to the Draft Local Plan, whilst the policies therein carry limited weight in the decision-making process, the evidence base underpinning this proposed direction of travel is a material consideration.
- 5.155. Table 1 of the Draft Local Plan acknowledges that, without further land releases, the forthcoming strategy cannot accommodate the Borough's identified housing need (12,763 dwellings) with a deficit of -4,439 dwellings.
- 5.156. The Borough is largely constrained by valued landscapes and identified flood risks reduce the potential capacity of the proposed Loddon Valley Garden Village to deliver the numbers envisioned by this draft strategic allocation. Arborfield stands to benefit from the wide range of services and facilities committed at the extant Arborfield Garrison development meaning the sustainability of the area will significantly increase over the coming years.
- 5.157. Development upon the Application Site aligns with the direction of travel outlined in this Draft Local Plan.

6. ASSESSING THE ACCEPTABILITY OF THE APPLICATION SCHEME

General

- 6.1. This section of the Planning Statement deals with the detailed aspects of the application proposal.
- 6.2. In so far as the scheme is submitted in outline form, the following section of this Statement demonstrates, when considered against the main issues, that the scheme is entirely acceptable in planning terms. The main issues, noted below are summarised in corresponding order:
1. Principle of Development
 2. Technical Considerations
 - Highways & Transport
 - Drainage
 - Housing Mix and Tenure
 - Character and Landscape
 - Heritage
 - Ecology
 - Energy and Sustainability
 3. Planning Obligations
 4. Planning Balances
 5. Overall Assessment and Final Balance
- 6.3. These matters are addressed in turn below.

(1) Principle of Development

- 6.4. The presumption in favour of sustainable development (or 'tilted balance') is engaged on account of the Council's inability to demonstrate a 4-year housing land supply. This includes in relation to the spatial application of its policies being out of date.
- 6.5. The Council's latest position is set out in their March 2023 Position Statement purports to be able to show a 3.2-year supply of deliverable housing land for the period 31st March 2023 to 31st March 2028.

- 6.6. Wokingham Borough Council is currently undertaking a review of the current Local Development Plan given that its youngest element, the Managing Development Delivery Local Plan is now 10 years old.
- 6.7. It is acknowledged that the Arborfield & Barkham Neighbourhood Plan is only 4 years old however, it does not make provision or allocations for meeting its housing needs. As such, the policies pertaining to the location and quantum of development therein must also be considered out of date.
- 6.8. The emerging Local Plan is quite rightly looking to review the housing requirement and the associated settlement boundaries. This is on account of the current Development Plan being out of date; including as the policies and proposals contained therein cannot meet current development needs (Regardless of the housing land supply position). This demonstrates that existing settlement boundaries to meet housing needs arising from the housing requirement in policy CP9 of the Core Strategy and policy CC02 of the Managing Development Delivery Local Plan are out of date (see Hopkins Homes).
- 6.9. In light of the Council's acknowledged housing land supply deficit, the Planning Inspectorate acknowledge the need to utilise greenfield land outside of defined settlement boundaries to redress the situation, with the Orchard Road Inspector stating at paragraph 90 of their decision:

“Moreover, when I consider the development plan conflict in the light of the shortfall in housing land supply, it is likely that, to redress this situation, at least some housing is to be required outside Development Limits on greenfield sites that are deemed to be countryside. It is also reasonable to assume that such sites may well be in less sustainable locations or locations where there is, relatively speaking, a greater reliance on private motorised transport than those identified through the local plan process.”

- 6.10. In the circumstances, the weight to be attributed to the conflict between the location of the Application Site close to, but beyond the settlement policy boundary for Arborfield Cross defined in Policy CP9 of the Core Strategy and policy CC02 of the Managing Development Delivery Local Plan is significantly reduced. These are the only development plan policy conflicts that are to be

occasioned by the Application Scheme. All other policy tests are satisfied.

(2) Technical Considerations

Highways & Transport

- 6.9. As set out in the TA, the Site is well located to take advantage of the existing pedestrian network and public transport facilities in Arborfield which will be enhanced through the extension of the public footpaths to the site itself. Furthermore, the TA confirms that the site is located within an accessible location, with a range of day-to-day services including educational, retail and convenience leisure facilities located within Arborfield and Arborfield Cross. These are all within both an easy walking and cycle distance from the site as shown in section 2 of the TA.
- 6.10. Section 3 of the TS explains the access proposals, with an enhanced bellmouth junction arrangement proposed (Appendix B to the TA refers), with a 5.5m wide vehicle access serving the Site from Reading Road.
- 6.11. Section 4 of the TA assesses the impact of the scheme in highway terms and confirms the acceptability of the proposals in relation to existing capacity in the network.
- 6.12. Regarding vehicular movements, the TA demonstrates that the estimated quantum of future additional vehicular movements arising from the proposed development would not significantly change the operation of the local highway network.

Drainage

- 6.13. The FRA confirms that the Site is located within Flood Zone 1.
- 6.14. The proposed SuDS strategy includes attenuation basins, swales and road gullies.
- 6.15. Pollution mitigation components will meet and exceed the required level of pollution mitigation for removing total suspended solids, metals and

hydrocarbons from the surface water runoff.

- 6.16. The FRA concludes that the principle of the proposed development is entirely acceptable with regard to flood risk grounds and the scheme can make a positive contribution towards sustainable surface water management.

Housing Mix and Tenure

- 6.17. Whilst submitted in outline form with only the principle of the development and means of access to be considered it is important nevertheless to consider the underlying need to provide for a range of house size, mix and tenure.
- 6.18. The Application Site, and the corresponding quantum of development will provide for a range of dwelling size and type that reflects the findings of the latest up to date evidence to ensure it provides for dwellings that appeal to all members of the community. The proposal will also provide for 40% affordable housing.
- 6.19. The Scheme would generate up to 44 affordable houses, a very substantial benefit in its own right.

Character and Landscape

- 6.20. The receiving landscape has been assessed in regard to its capacity to accommodate change and the supporting Design & Access Statement conforms the acceptability of developing the Site for housing having regard to the character of the surrounding area.
- 6.21. The Scheme retains boundary planting, and additional vegetation is proposed as part of the Landscaping Strategy (which matters are to be secured by condition).
- 6.22. Moreover, as the Council's evidence base for its Draft Local Plan confirms, the Application Site is one of the few locations that falls outside the proposed valued landscape designations.

Heritage

- 6.23. Two Grade II listed buildings, known as the Old Rectory and the Church of St Bartholomew respectively, are sited to the north of the Application Site. Additionally, a locally listed building known as Reading Room Cottage is within the locality.
- 6.24. As detailed further in paragraphs 6.44-6.51 of this planning statement, the proposed development would not result in any adverse effects upon these heritage assets.

Ecology

- 6.25. The Site is not subject to any local or statutory environmental designations.
- 6.26. Detailed surveys have been undertaken that have found the habitat value of the site to be of limited ecological interest, being dominated by neutral and modified grassland. Hedgerows and mature trees to the Site boundaries are of greater interest and will be largely retained and protected alongside development. Native tree and shrub planting will be undertaken to reinforce the site boundaries, along with street tree planting.
- 6.27. Surveys undertaken to inform the ecological report discounted the suitability of on-site structures to host roosting bats but did identify that the site is used by foraging & commuting bats. The development of the site, in particular the SuDS basin, offers the opportunity to enhance the foraging potential of the site for foraging bats.
- 6.28. The ecological survey also identified the presence of grass snakes and some bird activity but discounted the potential for badgers, dormice, riparian mammals, reptiles, amphibian and great crested newts. Subject to a careful approach to site clearance, no adverse effects upon grass snakes and nesting birds will occur – such measures can be secured by condition.
- 6.29. The Biodiversity Net Gain Assessment has determined that the proposed development is anticipated to result in a net loss of on-site Biodiversity Habitat.

The loss of Habitat Units on-site will be offset through the funding of strategic habitat creation and enhancement works off site. Such contributions towards these measures can be secured via legal agreement.

- 6.30. Measures have been proposed in respect of safeguarding fauna during construction, including bats and nesting birds. Ecological enhancement measures have been proposed in respect of fauna, including the provision of integrated bird and bat boxes and hedgehog gaps.
- 6.31. Development of the Site will result in residual losses of biodiversity at a site level. This residual loss will be mitigated for through on-site biodiversity enhancement measures and a biodiversity offset would be secured through an appropriate legal mechanism.
- 6.32. Based on successful implementation of the above, the development is not anticipated to result in any significant residual negative effects on important ecological features, with a net gain in biodiversity through onsite habitat creation and identified offset. This would allow for the proposed scheme to accord with relevant nature conservation legislation.
- 6.33. A Landscape and Ecology Management Plan ("LEMP") will also be secured by a planning condition(s) and prepared at the detailed design stage. The LEMP will set out measures for the establishment and long-term management of newly created and retained habitats to maximise benefits for biodiversity.
- 6.34. As such the Scheme represents an opportunity to achieve a **10% net gain in biodiversity**.

Energy and Sustainability

- 6.35. The approach to maximising energy efficiency and sustainability through the Scheme is contained in supporting Energy and Sustainability Statement.
- 6.36. The strategy adopts best practice in promoting an energy efficient and low carbon approach - with a view to minimising, not only the carbon usage now, but also in the future.

6.37. The energy hierarchy has three aims which are achieved through the approach to the scheme design as follows:

- **Be Lean** - achieved by utilising highly efficient building fabrics and the formation of a layout that maximises natural daylight, sunlight and passive ventilation - which in turn reduces the need for energy use in terms of the heating or cooling of a property.
- **Be Clean** – incorporating measures such as air sourced heat pumps in order to meet the thermal energy loads of houses.
- **Be Green** – incorporating of Low or Zero Carbon technologies through the installation of photovoltaics (PVs).

6.38. The combination of the three aims - Be Lean, Be Clean and Be Green will result in a reduction in CO₂ emission across the site well in excess of those required as part of the baseline of Part L of the Building Regulations and Policy CC05 of the managing Development Delivery Local Plan.

(3) Planning Obligations

6.39. Matters of detail, including in relation to the likely financial contributions are to be agreed as part of the reserved matters application including, subject to meeting the necessary tests at paragraph 57 of the NPPF, it is considered that the following may be provided for/sought through any CIL charge and site specific obligations:

- i. Affordable Housing (40%) (up 44 dwellings + financial contribution)
- ii. Sustainable Transport measures
- iii. Travel Plan
- iv. Management and maintenance provisions for the on-site open space
- v. Biodiversity net gain²⁷.

6.40. Any education needs and or contribution(s) to local infrastructure will be met through CIL and secured at the reserved matters stage.

²⁷ Paragraphs 174(d) and 180(d) of the NPPF refer

(4) The Planning Balance

General

- 6.41. The development plan is out of date in terms of the spatial application of its housing policies, whilst, in addition, the Council is not able to demonstrate a four year supply of deliverable housing land.
- 6.42. In the circumstances, the presumption in favour of sustainable development (the tilted balance) at paragraph 11(d) of the NPPF is engaged.
- 6.43. This requires planning applications to be approved unless footnote 7 considerations provide a clear reason for refusing development (which they do not); or any adverse impacts of granting planning permission would significantly and demonstrably outweigh the benefits. Again, they do not.

11d(i) - Do Policies in the NPPF Provide a Clear Reason to Refuse the Application

Heritage & Archaeology

- 6.44. S66 of the Planning (Listed Buildings & Conservations Area) Act 1990 requires that decision makers have special regard to the desirability of preserving and enhancing listed buildings and their settings.
- 6.45. There are two Grade II listed buildings, know as Church of St Bartholomew²⁸ and the Old Rectory²⁹ respectively, to the north of the site. Additionally, there is also one non-designated heritage asset known as Reading Room Cottage.
- 6.46. Noting that historic heritage assets should be conserved, paragraph 200 of the NPPF requires applicants to identify and describe the significance of any nearby heritage assets, including the contribution made by their setting, and the level of detail should be proportionate to the significance of the heritage asset. The Church of St Bartholomew and the Old Rectory are assets of special

²⁸ Historic England Listing Ref:1135983

²⁹ Historic England listing Ref: 1319096

architectural and historic interest significance whilst Reading Room Cottage is of low significance due to its architectural interest.

- 6.47. Paragraph 205 of the NPPF requires great weight to be attributed to the conservation of heritage assets. The NPPF defines the setting of a heritage asset as:

**“The surroundings in which a heritage asset is experienced.
Its extent is not fixed and may change as the asset and its
surroundings evolve”**

- 6.48. Historic England has issued guidance on the setting of heritage assets³⁰ provides further guidance on this matter, stating that the setting cannot be definitively and permanently mapped or defined as a set distance from the asset:

**“This is because the surroundings of a heritage asset will
change over time...Setting is not itself a heritage asset or a
heritage designation...its importance lies in what it
contributes to the significance of the heritage asset”**

- 6.49. The aforementioned heritage assets are physically segregated by intervening built form along Church Road, omitting intervisibility and removing the perception of the application site from these heritage assets. As such, no harm to the setting of any statutory or locally listed heritage assets will occur as a result of this proposal.

- 6.50. Additionally, the accompanying archaeological desk-based assessment confirms that the site offers little in the way of archaeological merit and the proposed works would not disturb an area of archaeological potential.

- 6.51. The Application Scheme respects the setting of the identified heritage assets, resulting in no harm.

³⁰ [Historic England \(Good Practice Advice Note 3\)](#)

Ecology/European Protected Sites

- 6.52. Similarly, under the approach set out at paragraph 188 of the NPPF, there are no habitats sites, AONB and/or Ancient Woodland impacts that provide a clear reason for refusing the development.

Flood Risk

- 6.53. The site is located wholly within Flood Zone 1, placing it at the lowest risk of flooding. The supporting FRA confirms the Site's suitability for the nature of development proposed and, in accordance with paragraph 175 of the NPPF, details the SuDS principles that will be applied to any final design at reserved matters stage.

Conclusion

- 6.54. To conclude, and for the reasons stated, the test at limb 11(d)(i) of the NPPF is satisfied.

11(d)(ii) Would Adverse Impacts Outweigh the Benefits

- 6.55. The second limb of paragraph 11(d) of the NPPF requires an assessment to be undertaken to identify whether any adverse impacts of granting planning permission would significantly and demonstrably outweigh the benefits.
- 6.56. As explained, the collective benefits of the Application Scheme are extensive.
- 6.57. As such, the identified adverse impacts of granting planning permission would not significantly and demonstrably outweigh the benefits when assessed against the policies in the NPPF taken as a whole (quite the opposite). As such, the Application Scheme benefits from the presumption in favour of sustainable development and planning permission should be granted.

(5) Overall Assessment and Final Balance

Development Plan Compliance

- 6.58. Whilst the Application Scheme conflicts with the settlement policy boundaries identified under Policies CP9 of the Core Strategy (and other NHP policy derived from this overall strategy/requirement), the Council cannot demonstrate a 4 year housing land supply. As such, this policy is considered out-of-date and the presumption in favour of sustainable development at paragraph 11(d) of the NPPF is engaged. Based upon the analysis set out in this Planning Statement, the proposal accords with the applicable development management policies.

Other Material Considerations: Conclusion

- 6.59. Because the Council is unable to demonstrate a four year supply of deliverable housing land, this triggers the presumption in favour of sustainable development at paragraph 11(d) of the NPPF.
- 6.60. The Scheme secures an extensive range of benefits, and the possible adverse impacts of granting planning permission would not significantly and demonstrably outweigh the benefits when assessed against the NPPF taken as a whole. As such, the scheme benefits from the presumption in favour of sustainable development.
- 6.61. For the reasons set out above, the material considerations lend further support for the grant of planning permission.

7. SUMMARY AND CONCLUSION

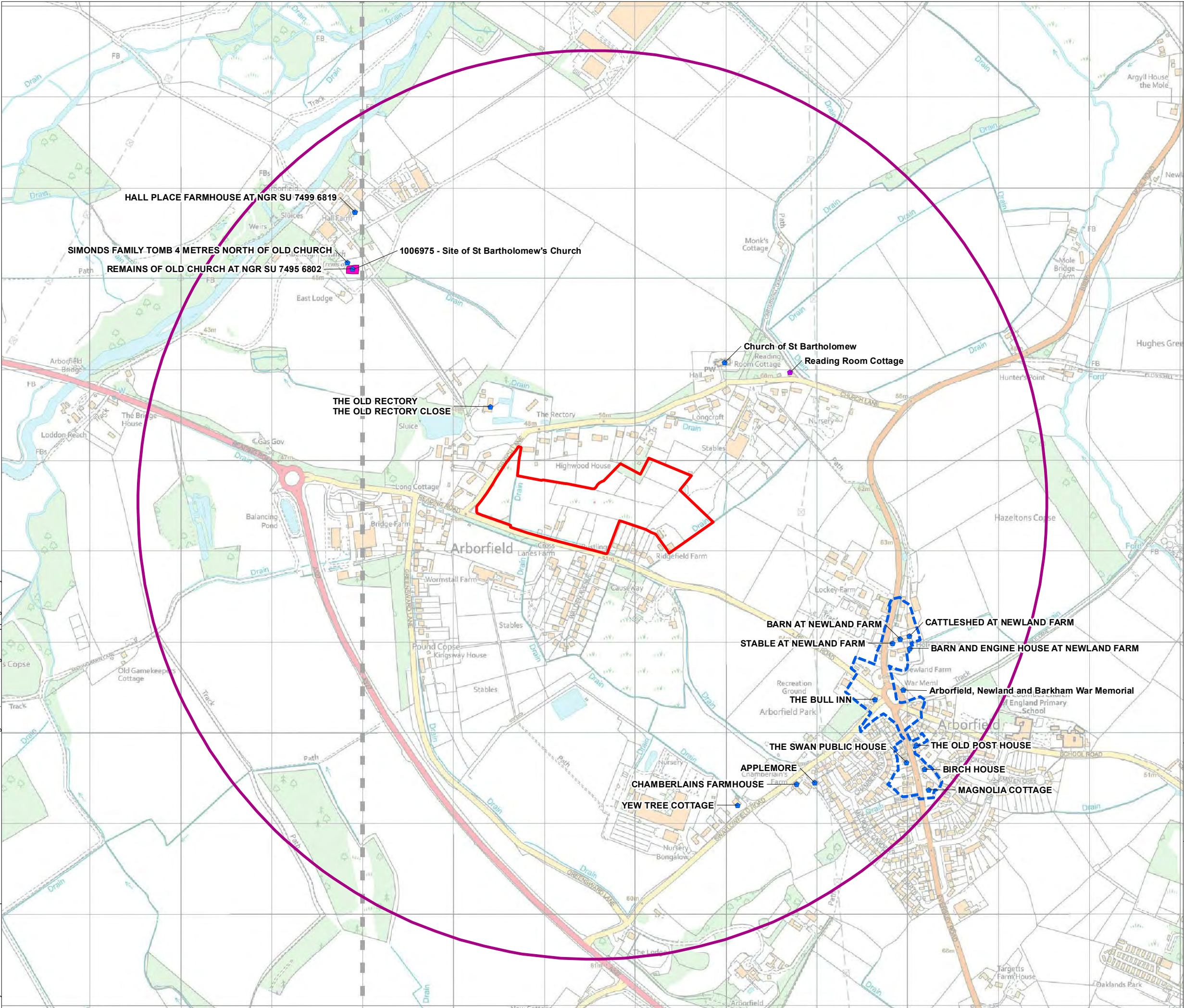
- 7.1. The Site is sustainably located, within walking distance from local services and facilities.
- 7.2. The development plan is out of date in terms of the spatial application of its housing policies, whilst, in addition, the Council is not able to demonstrate a four year supply of deliverable housing land³¹.
- 7.3. In the circumstances, the policies for the supply of housing are out of date for three reasons (any one of which triggers the tilted balance at paragraph 11(d) of the NPPF):
- a) the spatial application of settlement boundaries (which have been breached in order to meet current housing need);
 - b) the lack of a five year supply of deliverable housing land; and
- 7.4. This requires planning applications to be approved unless footnote 7 considerations provide a clear reason for refusing development (which they do not); or any adverse impacts of granting planning permission would significantly and demonstrably outweigh the benefits. As such, no such constraints are engaged here.
- 7.5. As assessed, there are no clear reasons for refusing planning permission under paragraph 11(d)(i) of the NPPF because:
- The Scheme is acceptable in flood and drainage terms; and
 - The erection of new buildings is permissible because no harm to the setting of nearby heritage assets will occur from the resulting development
- 7.6. In so far as the policies for the supply of housing are out of date, conflict with the settlement policy boundary is reduced on account of the need to breach settlement policy boundaries to meet housing needs. In the circumstances, limited weight can be applied to the loss of countryside.

³¹ [Wokingham Borough Five Year Housing Land Supply Statement at 31 March 2021](#)

- 7.7. The scheme results in many benefits, including the provision of market and affordable housing (both attract substantial weight), economic benefits (moderate weight) and environmental benefits arising from biodiversity enhancements (moderate weight).
- 7.8. As set out above, the harms resulting from the proposal do not significantly and demonstrably outweigh the benefits (quite the reverse).
- 7.9. The collective benefits of the development are extensive. As demonstrated, any possible adverse impacts of granting planning permission would not significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework taken as a whole. Accordingly, the Scheme benefits from the presumption in favour of sustainable development, and which is a further material consideration in support of the grant of planning permission.
- 7.10. It follows that the application of paragraph 11(d)(ii) NPPF provides a powerful material consideration to justify the grant of planning permission.
- 7.11. Overall, the Scheme secures a range of substantial benefits which justify the release of land beyond the settlement policy boundary. In the circumstances, settlement boundary policies do not provide a clear reason for refusing the development. In conclusion the limited adverse impacts of granting permission do not significantly and demonstrably outweigh the benefits. As such, planning permission should be granted.

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APPENDIX 1



Legend

Site Boundary

1km Search Radius

Designated Heritage Assets:

Listed Buildings (Grade II)

Conservation Area

Aborfield Cross

Scheduled Monument

Site of St Bartholomew's Church

Non-designated Heritage Assets:

Reading Room Cottage

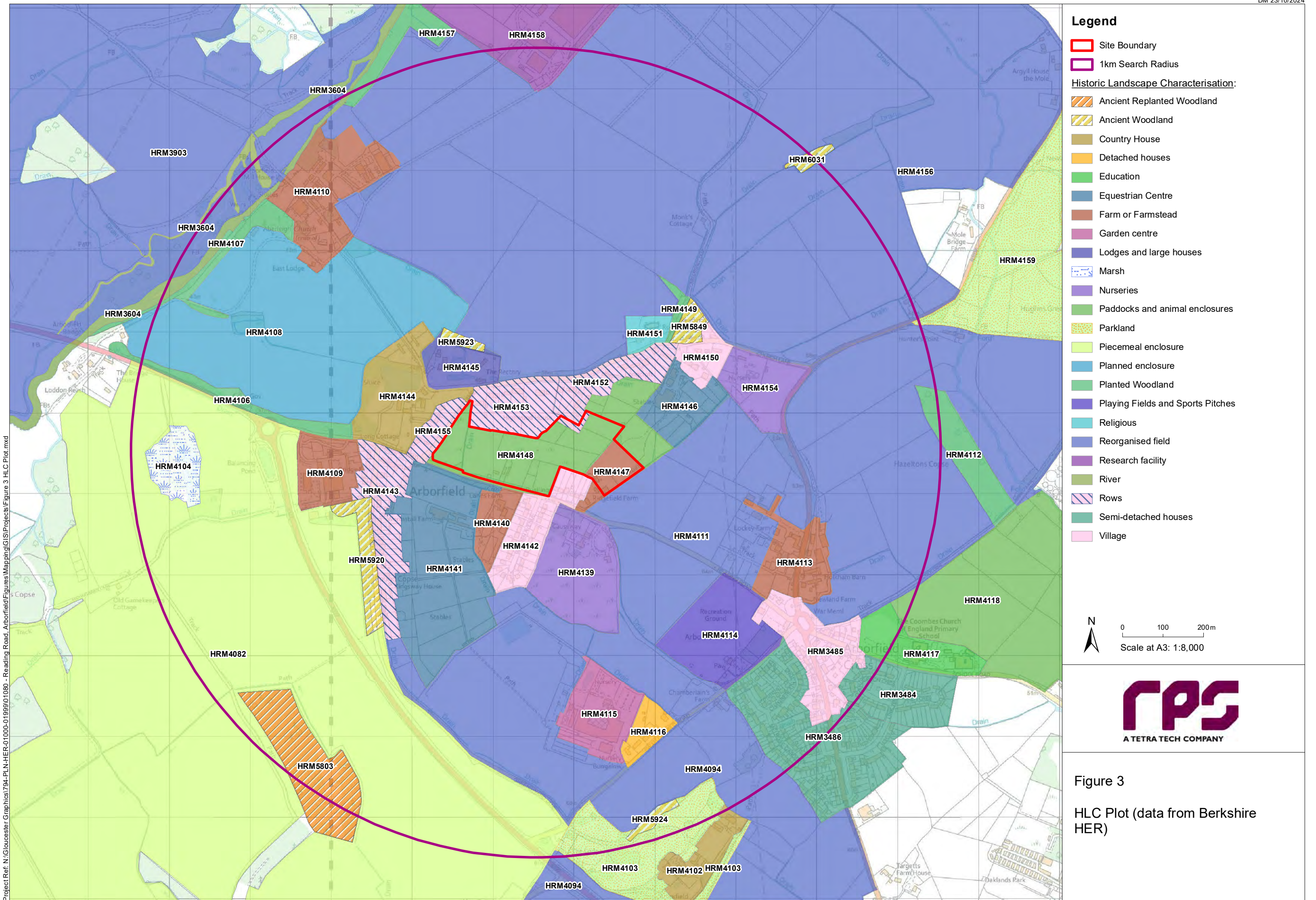


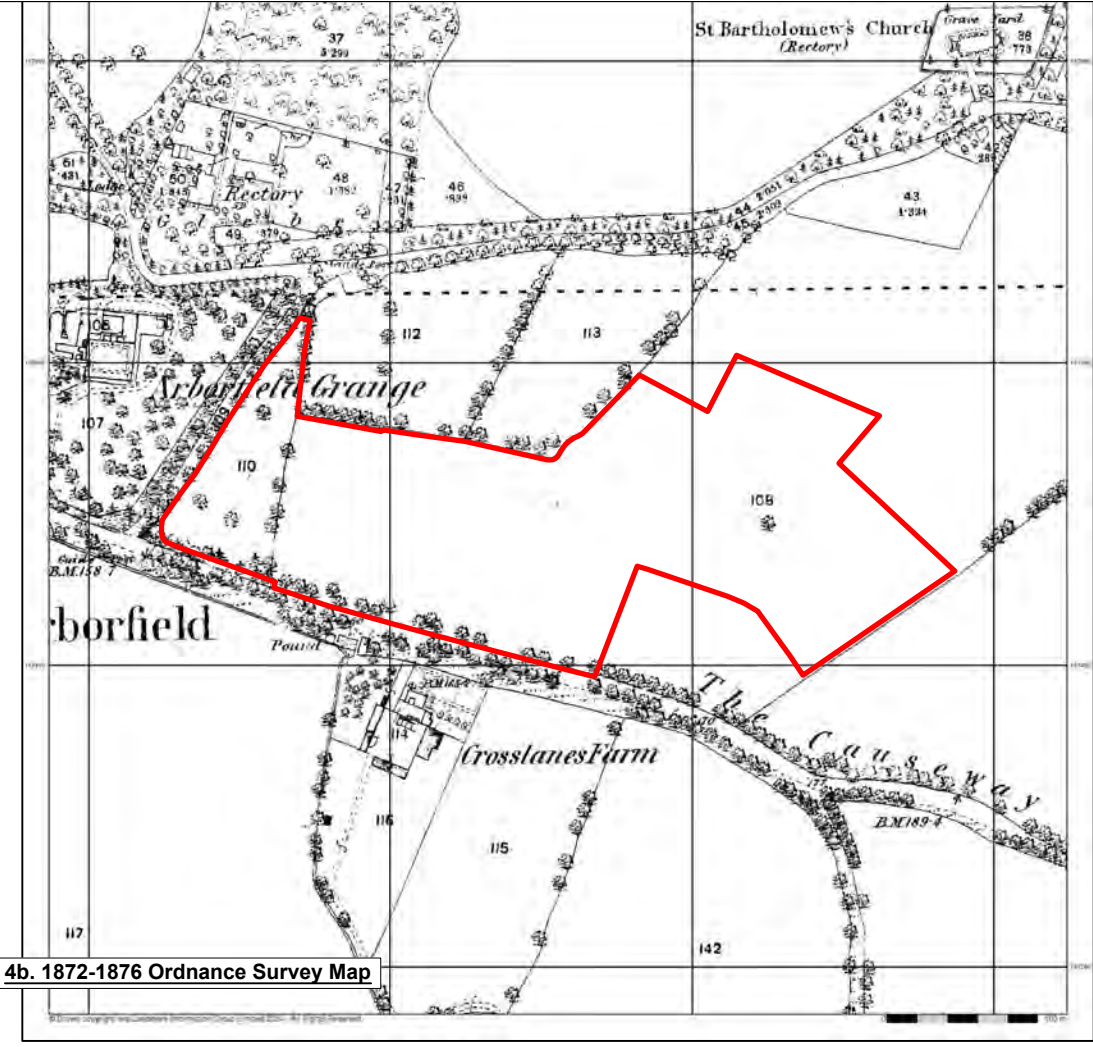
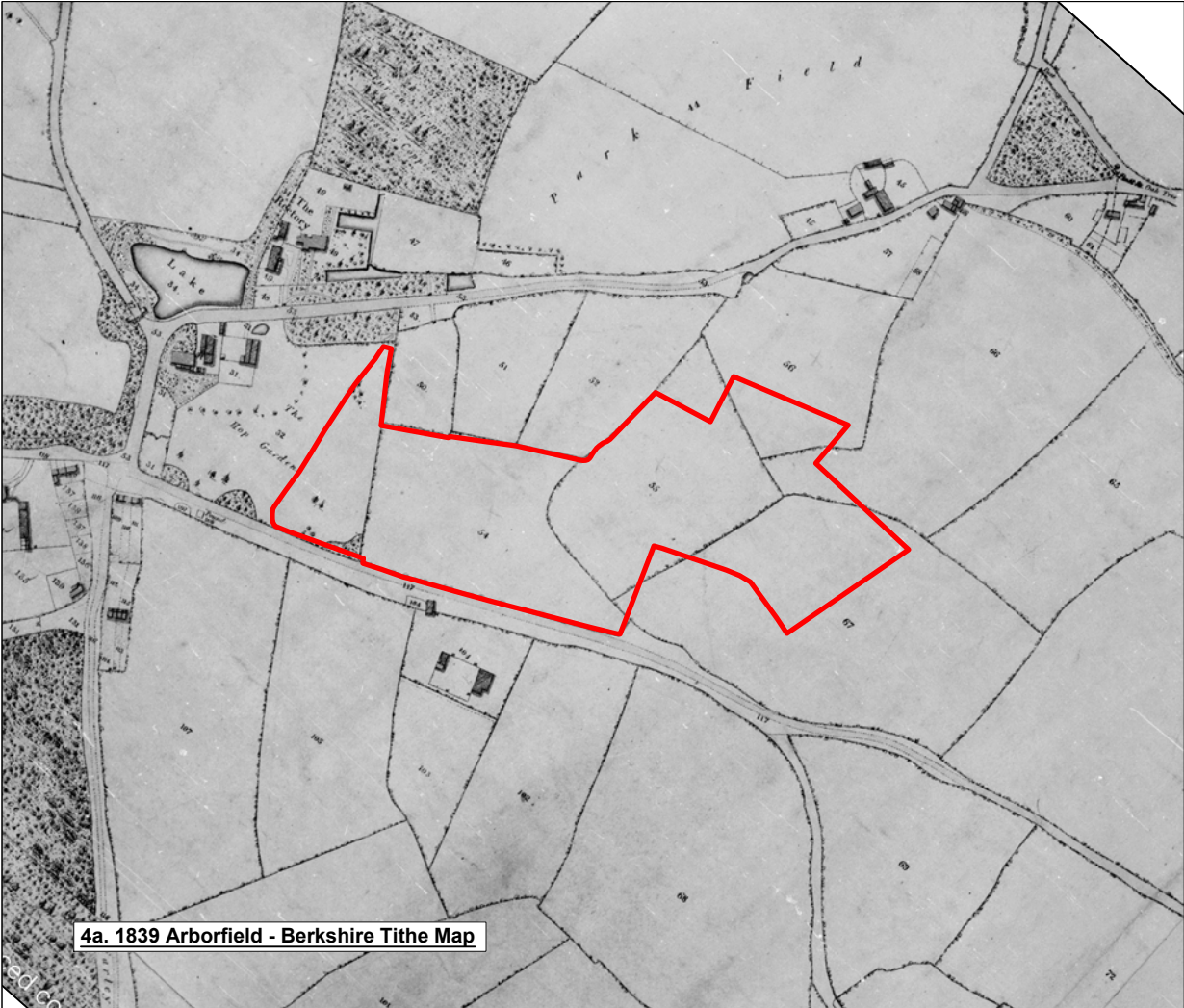
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Figure 2

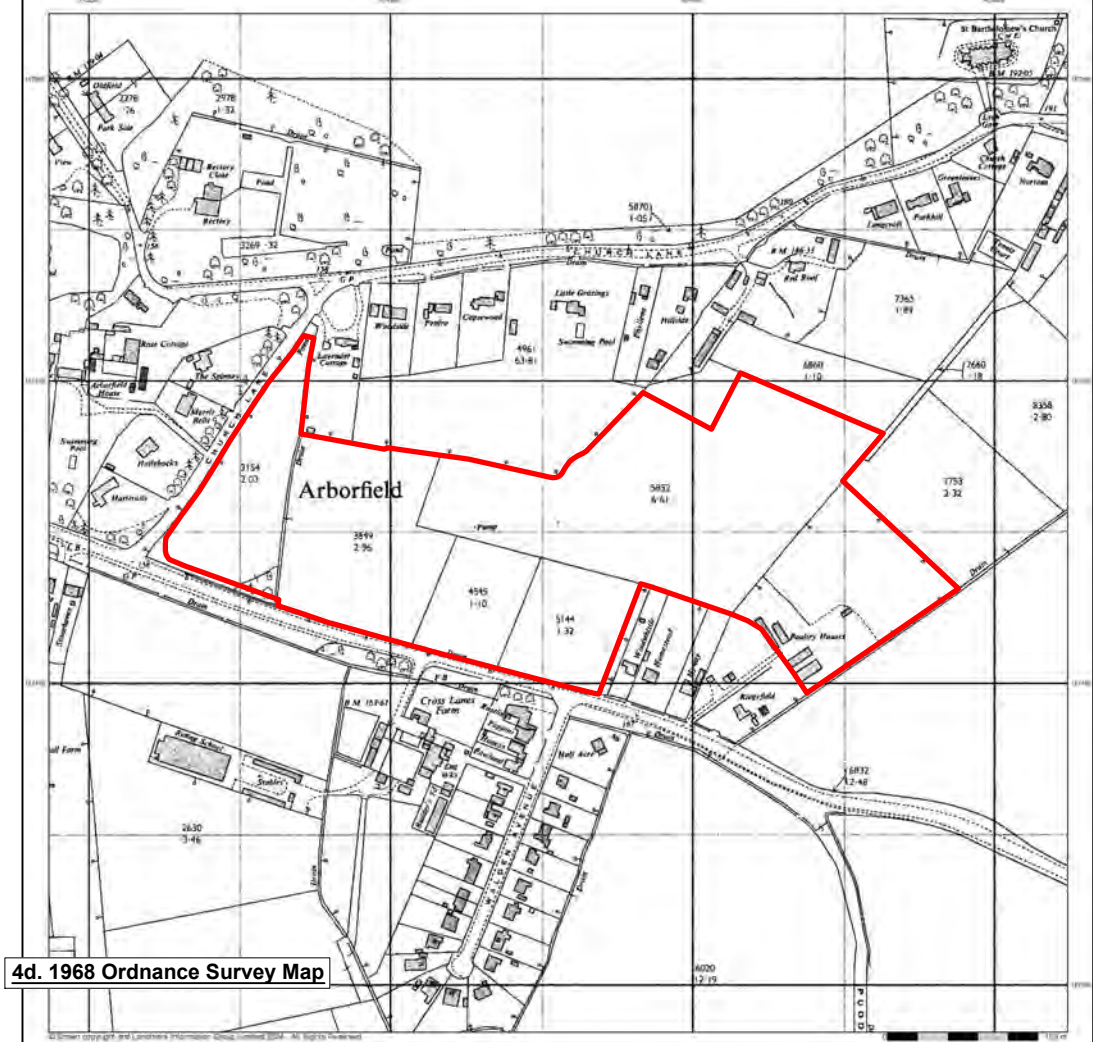
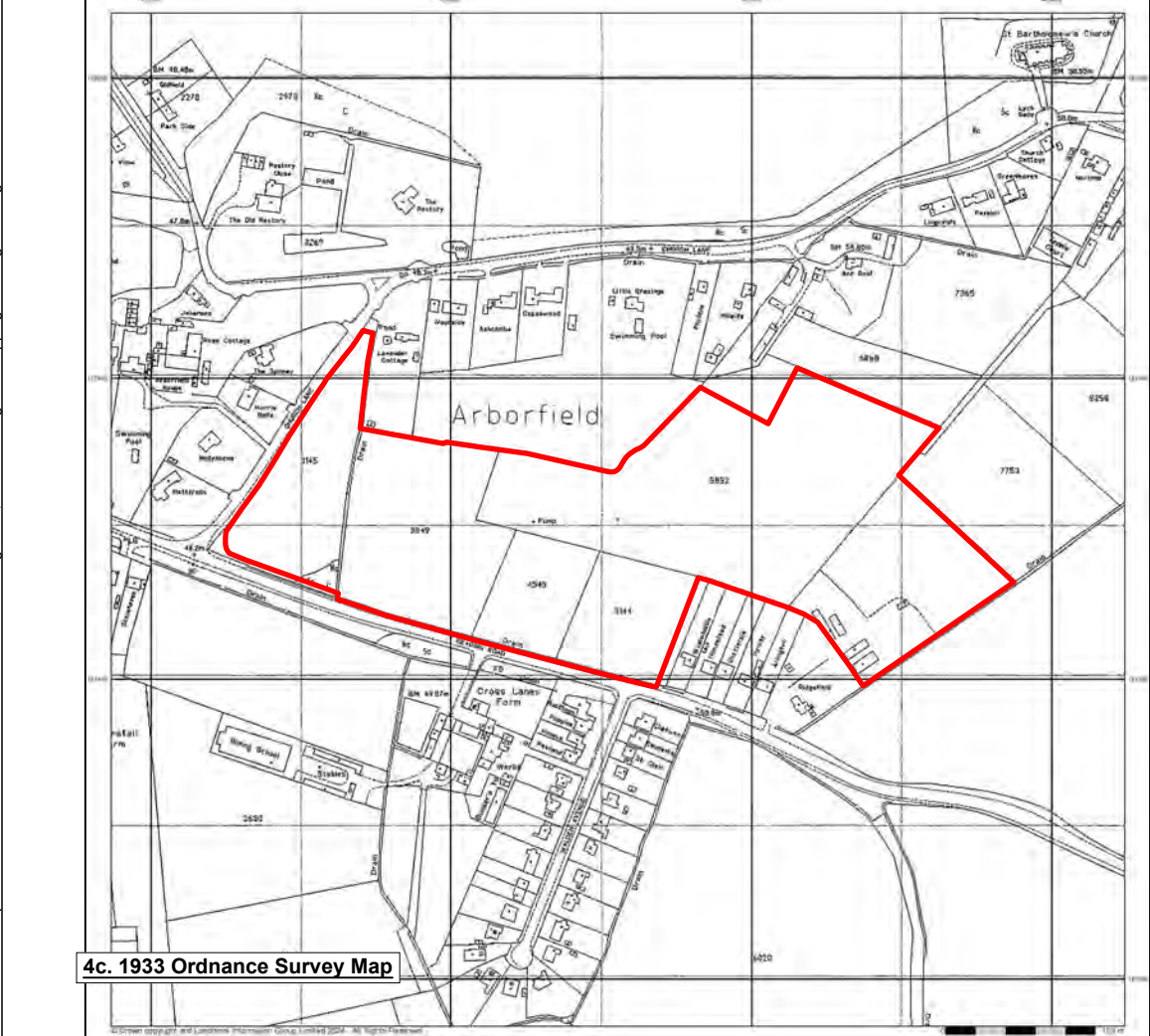
Built Heritage Assets





Legend

 Site Boundary



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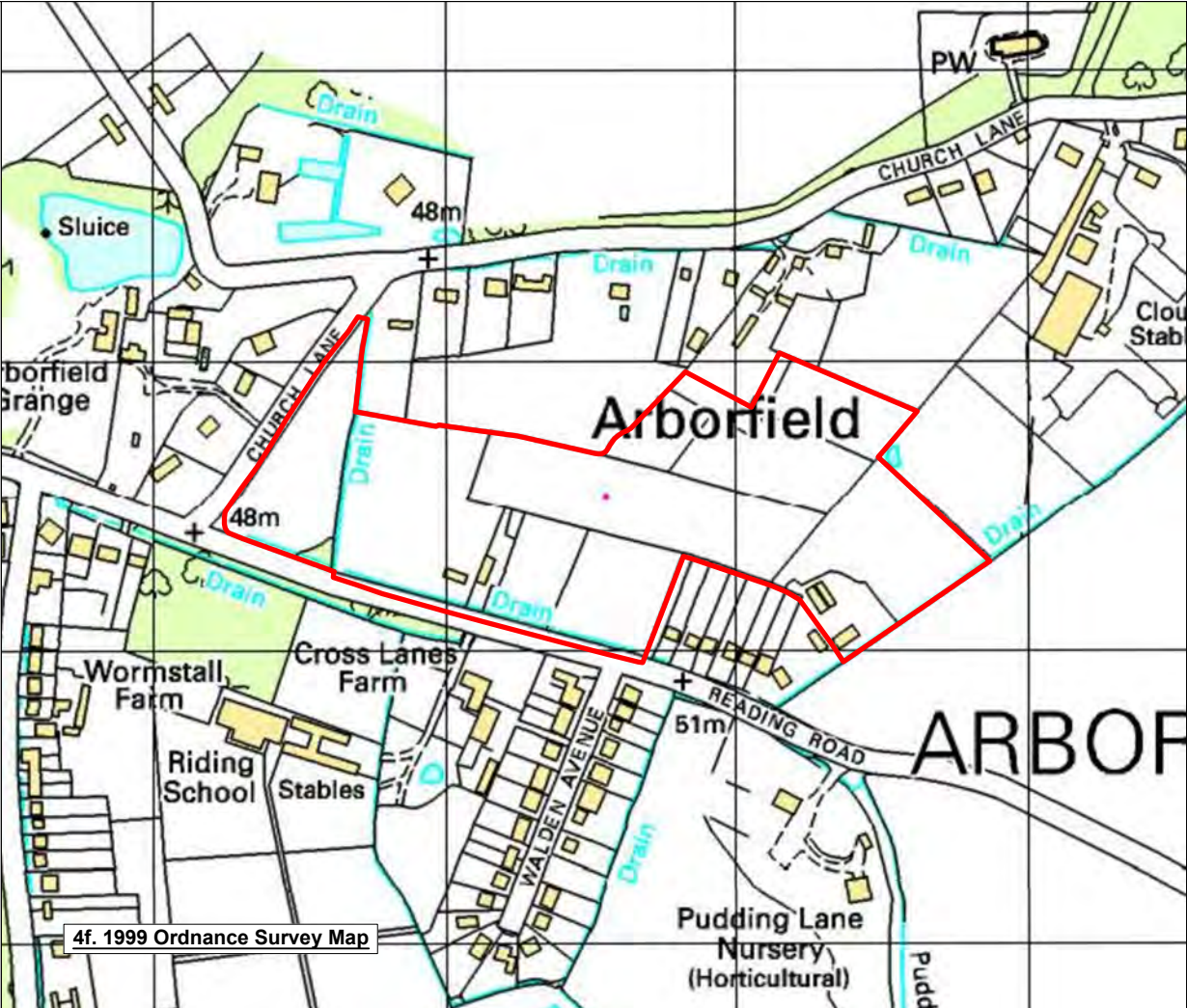
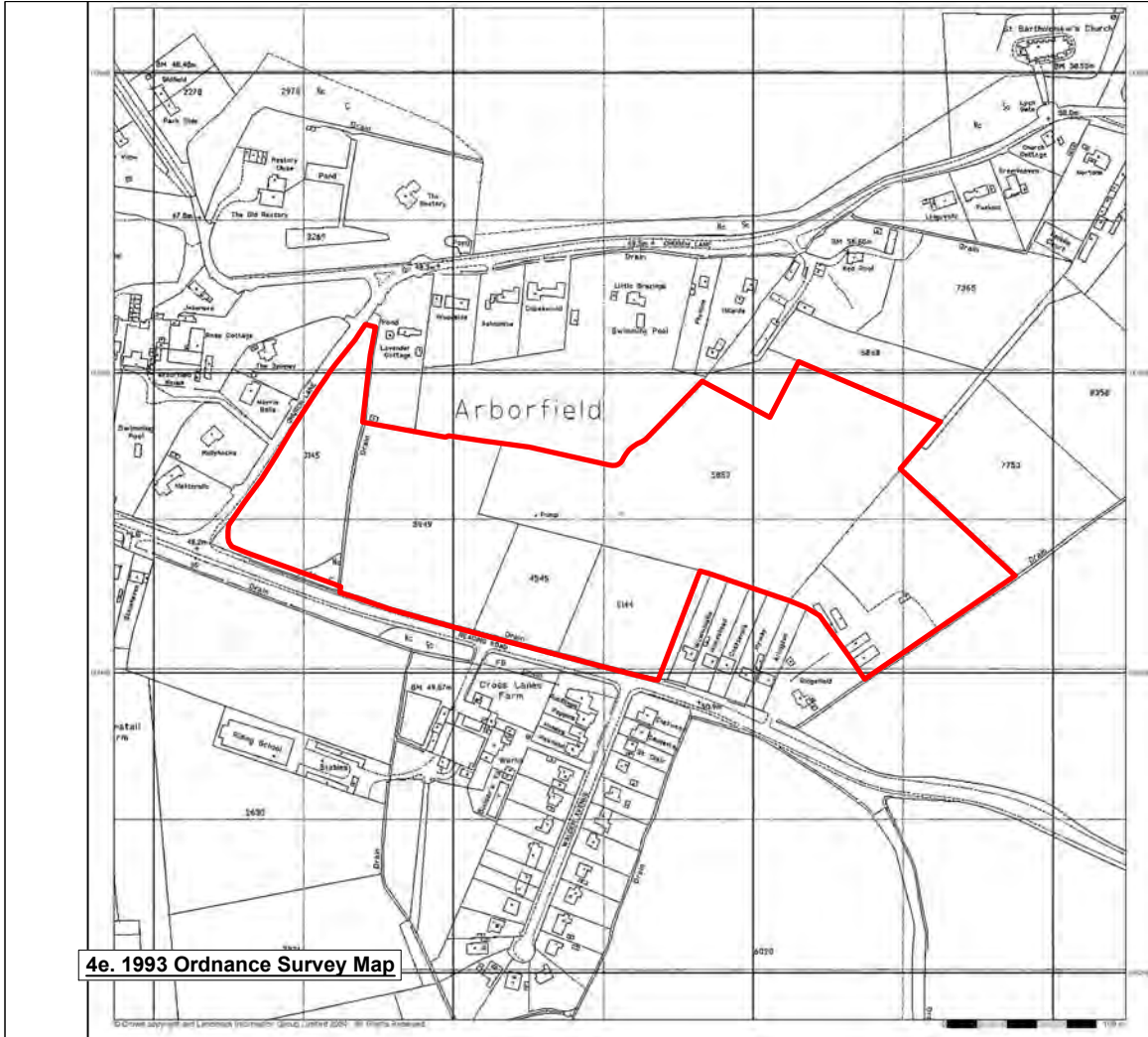
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Figure 4a - 4d

Reading Road, Arborfield



Legend

Site Boundary



0 50 100m
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Figure 4e - 4h
Reading Road, Arborfield

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