

Planning Statement

(Including Affordable Housing Statement
and Community Engagement Statement)

Land North of Sun Lane, Riseley

Prepared For
**The Wellington Estate and
3West Group**

5643
March 2026



WELLINGTON



3West Group



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1 INTRODUCTION

- 1.1 This Planning Statement has been prepared on behalf of the **Wellington Estate** and **3West Group** and is produced in support of an Outline Planning Application ('the Application') submitted to Wokingham Borough Council (WBC) and in parallel to Hart District Council which are the Local Planning Authorities ('LPA') for this cross boundary application.
- 1.2 The administrative boundary of Wokingham Borough and Hart District intersect at the junction of Sun Lane and Basingstoke Road which is illustrated by the black line in Figure 1 below. Only 0.03ha of the red line falls within Hart District with all of the development parcel falling within Wokingham Borough. This is shown in the accompanying Constraints Plan drawing prepared by Ashby Design (reference 713/25/OUT/PL1002) and also illustrated in Figures 1 and below.



Figure 1: Area of the site falling within the administrative boundary of Hart District denoted by green highlight

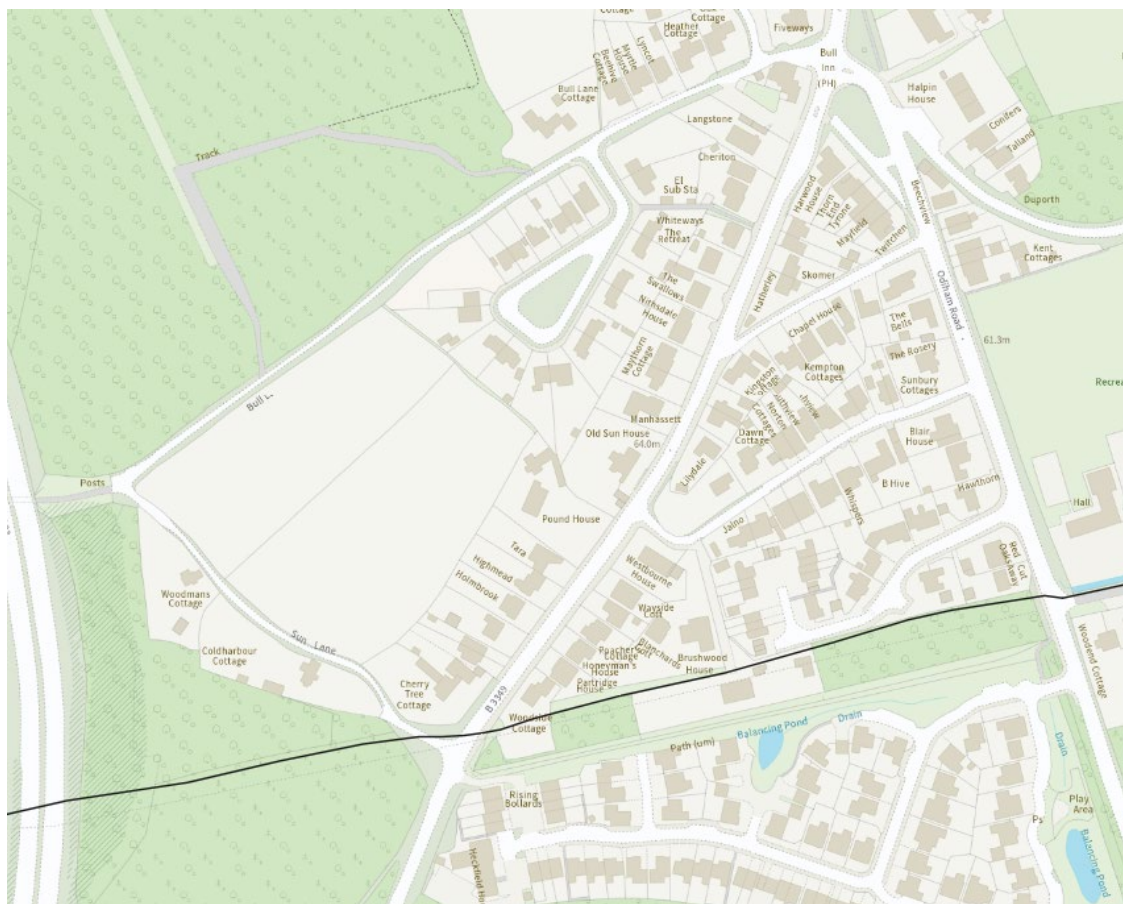


Figure 2: Administrative Boundary - Wokingham Borough and Hart District (black solid line)

- 1.3 Nonetheless, it is necessary to submit two duplicate applications – one to each respective Local Planning Authority. In accordance with the Fee Regulations, the application fee is provided to the authority with the largest area, which in this case is Wokingham Borough Council.
- 1.4 This Planning Statement has been prepared to take account of the proposed development, as a whole, and the impacts relevant to each LPA are addressed accordingly.

DEVELOPMENT DESCRIPTION

- 1.5 The Application is submitted in Outline with all matters reserved, except for detailed access. The development description is:



“Outline application with all matters reserved except for access for the construction of up to 44 dwellings, including affordable housing together with access, landscaping and associated infrastructure (cross boundary application)”.

SITE AND CONTEXT

- 1.6 The site is located between Sun Lane to the south, Bull Lane to the west, a row of dwellings fronting onto Basingstoke Road to the east, and dwellings within the cul de sac of Yeosfield to the north.
- 1.7 The site is situated outside of the defined settlement boundary of Riseley but is contiguous with the boundary along the northern and eastern boundaries. For planning policy purposes, for both Wokingham Borough and Hart District, the site is located within the countryside.

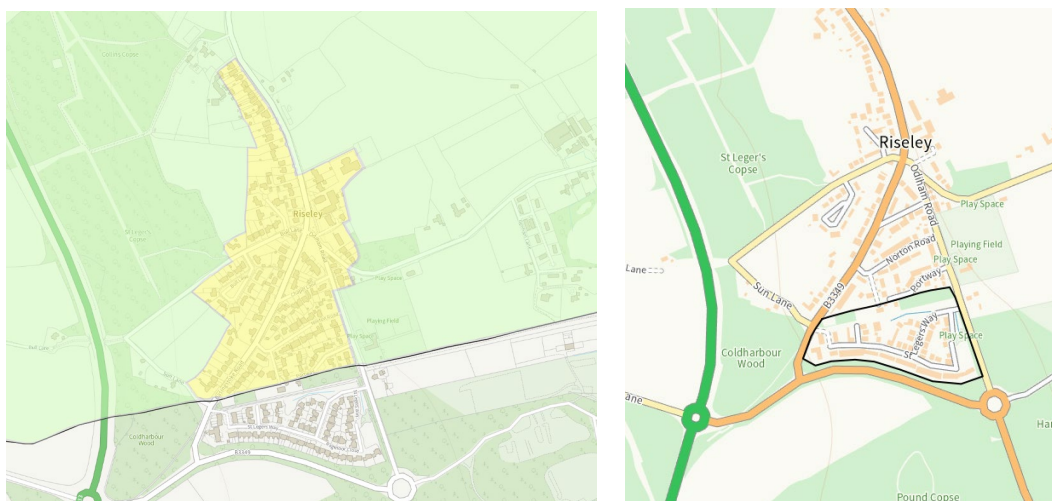


Figure 3 Settlement Boundary (left in yellow Wokingham, right black line Hart)

- 1.8 The application site measures 1.98 hectares and is enclosed by hedgerows, trees and informal field boundaries. The land has historically been used for pastoral grassland and comprises two parcels divided roughly centrally by a mixed tree and hedgerow belt running on a broadly north-south axis.
- 1.9 Locally, there are two statutory listed buildings; Pound House is located on the north eastern boundary whilst Coldharbour Cottage is located on the southern side of Sun Lane; both are listed Grade II. In terms of below ground archaeology, the route of the Devils Highway Roman Road runs across Basingstoke Road, at the intersection with Sun



Lane. However, the exact alignment of this feature varies between Wokingham Borough and Hart District.

- 1.10 The site is located within the Stanford End Wooded Sand and Gravel Hills Landscape Character Area and the Riseley Farmed Clay Lowland Landscape Character Area.
- 1.11 There are no protected trees on the site, although it is noted that two protected oak trees are located on Basingstoke Road to the north of the junction with Sun Lane and which were confirmed by order reference: 1737/2020 on 20 November 2020.
- 1.12 The site is located within the 12km zone of influence for AWE Burghfield.

PLANNING HISTORY

- 1.13 Both council online planning registers have been reviewed, and no planning applications are attributed to the application site.
- 1.14 In terms of development in the immediate context, Outline planning permission was granted in November 2017 under **16/02989/OUT** for residential development at St Legers Way (within Hart District) comprising 83 dwellings. The subsequent Reserved Matters approval **18/00242/REM** was granted in November 2018. At that time, Hart District Council approved this development as a departure from the Local Plan as it represented development outside of any settlement boundary. No objection was raised by Wokingham Borough Council. The approval of this application in effect extended the settlement boundary of Riseley, as demonstrated in Figure 2 above.
- 1.15 To the northeast of the village, an Outline application for up to 28 dwellings was refused by Wokingham Borough Council in March 2018 under reference **L171084**. That application, although considered under the same Development Plan, was determined within a different national planning framework and where Wokingham Borough Council could demonstrate a 5-year housing land supply.
- 1.16 More widely, an application at Land West of Trowes Lane and North of Charlton Lane, Swallowfield (application ref **230422**) for the erection of 81 dwellings (including 40% affordable homes), open space, SuDS, landscaping, biodiversity enhancements, new



vehicular access off Trowes Lane, pedestrian and cycle links, and associated infrastructure was refused by the council but allowed at appeal on 19 July 2024¹. The Inspector in that case noted in the decision notice:

53. “I have found that the appeal proposal would conflict with the spatial strategy of the development plan as the site lies outside the settlement limits of Swallowfield and does not constitute development appropriate in a countryside location. Given the lack of housing land supply, application of that strategy needs to be applied in a flexible way to ensure that sufficient land for housing continues to come forward”.

“55. Set against these conflicts are a number of benefits that would flow from the appeal scheme. The most important would be the provision of 81 new dwellings in a range of sizes. That would be of particular importance given the demand for housing in the area and the lack of available land on which to build new dwellings. Forty per cent 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.

“57. My approach to balancing these competing factors must however rest on the presumption in favour of sustainable development contained in paragraph 11d) of the Framework, sometimes referred to as the ‘tilted balance’. As the Council is unable to demonstrate an adequate housing land supply, national planning policy contained in that paragraph requires planning permission to be granted unless any adverse impact of doing so would significantly and demonstrably outweigh the benefits. I consider that the application of that national policy should be tempered to a limited extent because of recent past over-supply of housing and having regard to the size of the shortfall at 0.8 years. Nevertheless, the presumption remains and carries significant weight. The

¹ APP/X0360/W/24/3340006



need to apply a presumption in favour of sustainable development is reinforced by Policy CC01 of the Local Plan”.

2 THE PROPOSAL

OUTLINE APPLICATION

- 2.1 The application is submitted in Outline with all matters reserved save for access which is submitted in detail. The application seeks approval for up to 44 dwellings with 40% affordable housing provided for on site. The detailed access and highway works are located largely within the administrative boundary of Hart District and as such this detailed element is subject to their approval whilst the outline matters and the balance of the highway works are for determination by Wokingham Borough Council with future reserved matters pertaining to layout, scale, appearance and landscaping to be determined by Wokingham at a later date.
- 2.2 The application is supported by an illustrative masterplan and parameters indicating how the development of this scale can be delivered on site.



Figure 4 - Illustrative Site Layout Plan



- 2.3 The proposed dwellings will have a maximum of two storeys and can meet Nationally Described Space Standards (NDSS). As already mentioned, 40% affordable housing will be provided for on site. The number, size and tenure of those houses will be determined through a later reserved matters application but can be secured by S106 legal agreement in the first instance.
- 2.4 It is envisaged that the new dwellings will comprise traditional architectural design taking cues from the surrounding and wider built form and character. Again, the detail of this will be subject to later reserved matters however, the accompanying Design and Access Statement should be referred to for design and context analysis.
- 2.5 A new vehicular access into the site is to be taken from Sun Lane with improvements proposed at the junction with Basingstoke Road (within Hart District). These proposed junction amendments and realignment of Sun Lane are proposed to provide access into the site and are wholly within the adopted highway and follow the existing road alignment as closely as possible. Additionally, pedestrian access to Bull Lane is also proposed.
- 2.6 The indicative masterplan illustrates that there is sufficient on-site space to incorporate drainage solutions and which can then be discharged off site via a managed process. The detail of the drainage solution is predicated on the final design and layout, which will come forward as a Reserved Matter. Nonetheless, the accompanying report demonstrates that surface and foul drainage can be appropriately managed. The strategy for foul water, is for the proposed adoptable foul pumping station to receive foul flows from the development. Pumped flows will discharge to the adopted foul sewer network within Basingstoke Road. In terms of the strategy for surface water, this is to be attenuated on-site then pumped to the western edge of the site, where a new adoptable gravity system will convey flows off-site to the east, towards the ordinary watercourse adjacent the Devil's Highway which outfalls to Long River. The details can be controlled by condition and subsequent separate legal agreement with the water authority.



COMMUNITY ENGAGEMENT

- 2.7 The application site extends to 1.98 and proposes up to 44no. new dwellings which is, for the purposes of planning, a 'major' development and therefore, there is an expectation within the Wokingham Statement of Community Involvement that there will be some engagement with the local community, to obtain views from residents. This is also encouraged within the Hart District Statement of Community Involvement. It should be noted that there is no mandatory obligation to do so, and no framework for how such engagement should be undertaken.
- 2.8 The applicant acknowledges that the proposed development will have an impact on the local community, in particular given the perceived uncertainty of an outline application. On the 12 March, the Applicant posted first class a letter to 37no. of homes by way of direct letter. The letter notified the local community of the Applicant's intention to submit an Outline application and provided a summary of the proposed development. Additionally, a separate letter was posted to the owner/occupiers of Coldharbour Cottage and Woodmans Cottage, as these two dwellings will be more directly and indirectly impacted by the proposed access works. The latter of these homes is located on Basingstoke Road at the junction of Sun Lane, whilst the former is located to the south of Sun Lane. The letter to both of these properties included a plan of the proposed access configuration. The letters included a dedicated email where questions and/or comments on the proposed development could be directed. At the time of writing, no comments have been received. The letter is appended to this statement at **Appendix A**.



3 POLICY CONTEXT

- 3.1 Section 70 of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004 require that planning applications should be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 3.2 As this application is cross boundary, it is necessary to identify the relevant Development Plan for each respective LPA. In this case, for Wokingham Borough Council the Development Plan consists of the Wokingham Core Strategy adopted in January 2010 and the Managing Development Delivery Local Plan adopted in February 2014 together with saved Policy NRM6 (Natural Resource Management 6) of the South East Plan. No Neighbourhood Development Plan has been 'made' for the parish of Swallowfield.
- 3.3 For Hart District Council the Development Plan consists of the Hart Local Plan (Strategy and Sites) adopted in April 2020 and the saved policies of the Hart Local Plan (Replacement) adopted in May 2020.
- 3.4 The National Planning Policy Framework (NPPF) (February 2025) and its accompanying practice guidance together with Written Ministerial Statements and non-statutory supplementary planning documents are also key material considerations.
- 3.5 Both Councils are in the process of updating their Development Plan but are at different stages in the process. Wokingham Borough Council is at a far more advanced stage with the first phase of the Examination in Public on their new Local Plan having commenced in November 2025. The dates for the second phase were published on 2 February 2026 confirming that the stage 2 will be held over 4 weeks running between 17 March – 12 June, with a fifth week held in reserve in July 2026, should additional sessions be required. Whilst the emerging policies do start to carry weight, at this stage where this emerging plan has not yet been found sound, only limited weight can be attributed.



- 3.6 Turning to Hart District Council, they are at a much earlier stage in the plan making process having conducted a Call for Sites consultation with the submission of a new Local Plan for examination not anticipated until Spring 2028.

WOKINGHAM STRATEGIC PLANNING POLICY – CORE STRATEGY 2010

- 3.7 Whilst the application of policies within the Development Plan are explored in more detail relevant to the assessment of the proposal in Section 5 of this statement, for the purpose of identification, the following policies are relevant.

- Policy CP1 – Sustainable Development
- Policy CP3 – General Principles for Development
- Policy CP4 – Infrastructure Requirement
- Policy CP5 – Housing Mix, Density and Affordability
- Policy CP6 – Managing Travel Demands
- Policy CP7 -Biodiversity
- Policy CP8 – Thames Basin Heaths Special Protection Area
- Policy CP9 – Scale and Location of Development Proposals
- Policy CP11 – Development outside Development Limits (including countryside)
- Policy CP17 – Housing Delivery

WOKINGHAM STRATEGIC PLANNING POLICY – MANAGING DEVELOPMENT DELIVERY LOCAL PLAN 2014

- 3.8 As per paragraph 3.6 the following policies are identified as relevant and are explored later in this Statement.

- Policy CC01 – Presumption in Favour of Sustainable Development
- Policy CC02 – Development Limits
- Policy CC03 – Green Infrastructure, Trees and Landscaping
- Policy CC04 – Sustainable Design and Construction
- Policy CC07 – Parking
- Policy CC09 – Development and Flood Risk (from all sources)
- Policy CC10 – Sustainable Drainage
- Policy TB05 – Housing Mix



- Policy TB07 – Internal Space Standards
- Policy TB08 – Open Space, sport and recreational facilities standards for residential development
- Policy TB21 – Landscape Character
- Policy TB23 – Biodiversity and Development
- Policy TB24 – Designated Heritage Assets
- Policy TB25 – Archaeology

HART STRATEGIC PLANNING POLICY - LOCAL PLAN (STRATEGY AND SITES) 2020 AND SAVED HART LOCAL PLAN (REPLACEMENT) 2020.

3.9 Only 0.03ha of the red line is located within the administrative district of Hart, covering the reconfiguration of the junction of Sun Lane and Basingstoke Road.

- Policy SD1 – Sustainable Development
- Policy INF1 – Infrastructure
- Policy INF3 – Transport
- Policy GEN1 General Policy for Development

NATIONAL PLANNING POLICY FRAMEWORK FEBRUARY 2025

3.10 The National Planning Policy Framework sets out the Government's planning policies for England and how these should be applied. The Framework should be read as a whole (including its footnotes and annexes).

WOKINGHAM NON STATUTORY MATERIAL CONSIDERATIONS

3.11 In addition to the statutory development plan, the council has published a number of non-statutory guidance documents which are material to the assessment of the application. Similar to the development plan policies, the age and conformity with national policy must be considered in applying weight to this guidance.

- Riseley Village Design Statement
- Sustainable Design and Construction SPD (and companion guidance)
- Affordable Housing SPD
- Parking Standards
- Thames Basin Heath SPA guidance



WOKINGHAM EMERGING LOCAL PLAN

- 3.12 The Council has prepared a new Local Plan which, if found sound, will replace the existing Development Plan.
- 3.13 The Local Plan Update (LPU) was submitted to the Secretary of State for examination on 28 February 2025. The Examination in Public (EiP) is to be heard in two sessions. Session 1 has concluded (November 2025). The Council responded to the Inspectors' subsequent post-hearing questions and submitted a number of documents at the end of December 2025. The Inspectors have concluded that the examination can proceed to Stage 2. The hearing sessions for stage 2 have been published and, as noted earlier, are to be held over a 4 week period running between 17 March and 12 June. Additional reserve sessions have been scheduled, if required, and which will be held between 7 July and 10 July 2026.
- 3.14 The LDU is already 7 months behind schedule and therefore assuming there are no further delays, it is anticipated that the earliest the LPU will be adopted is the end of 2026.
- 3.15 In accordance with paragraph 49 of the NPPF, weight may be given to relevant policies in emerging plans according to the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given) (para 49(a)).
- 3.16 In this regard, as the examination has not yet concluded Stage 2, it is our view that only limited weight can be afforded to the emerging policies at this time.

HOUSING

Five Year Housing Land Supply Position

- 3.17 WBC published its latest five-year housing land supply statement in August 2025, showing the position as of 31 March 2025. In applying the Government's December 2024 standard methodology, the Local Housing Need (LHN) is 1,316 dwellings per annum from 1 April 2025. Due to historic delivery, the requisite 5% buffer has been added, with the Council concluding that they can only demonstrate a housing land supply of **2.5 years**. This means there is a significant shortfall of 3,456 dwellings over the



next five years in Wokingham. There remains a demonstrable housing need, and in particular the requirement for sites of a size which can deliver affordable housing, and in the short term. This importance of short-term delivery is further emphasised within the Council's evidence to the LPU and the council's emerging strategy is seeking to apply a stepped trajectory. They do not anticipate meeting the housing need within the first three monitoring years which demonstrates that sites, such as Land North of Sun Lane, can play a key part in the delivery of new homes of different tenure, to count toward meeting an identified need.



4 AFFORDABLE HOUSING STATEMENT

- 4.1 For the avoidance of doubt, this section addresses solely Wokingham Borough Council's affordable housing need, as the position of Hart on this matter is not relevant in this instance.
- 4.2 Policy CP5 of the Core Strategy requires the delivery of 40% affordable housing where the site is located 'outside of development location' (as defined by policy CP9 of the Local Plan). CP5 is positively phrased, such that planning permission will be granted where development provides *"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"*.
- 4.3 In addition to Policy CP5, the Council has produced an Affordable Housing SPD. This is now of some age, having been adopted in 2013 and pre-dates the most recent NPPF 2025 which includes government definition of affordable housing.
- 4.4 This application is in outline and therefore, the final detail of the housing size and mix will be a matter determined through future Reserved Matters. Nonetheless, the illustrative masterplan has been prepared and is based on the following indicative housing mix:
- 8no. One-bedroom maisonettes
 - 17no. Two-bedroom houses
 - 15no. Three-bedroom houses
 - 4no. Four-bedroom houses
- 4.5 The application is presented on the basis of delivering a policy compliant 40% affordable housing on site. Taking the upper number of units proposed i.e. 44 dwellings, this would equate to the delivery of 17.6 new affordable homes. The Council's Local Plan and SPD on Affordable Housing do not specify how the Council seeks to deliver affordable housing where there is a percentage of a whole number. As this reflects the outline nature of the application, the final number of affordable homes will be determined, as noted earlier, at RM stage.



- 4.6 In terms of the affordable housing mix, the *“Berkshire (including South Bucks) Strategic Housing Market Assessment”* (SHMA) February 2016 indicates the following approximate affordable housing mix based on dwelling size: 1-bedroom (30/35%), 2-bedroom (30/35%), 3-bedroom (25.30%) and 4-bedroom (5/10%). The SHMA is now of some age and council evidence for the emerging local plan is less specific on affordable size requirements. In any event, the size of affordable dwellings will be determined through the future Reserved Matters stage, and which can reflect the requirements, at that time, noting that in terms of the overall mix, there is a broad provision of house sizes.
- 4.7 The Council’s preferred tenure split for affordable housing is based upon a 70:30 split between social rent and shared ownership, and again, it is proposed that this can be delivered as part of this proposed development and secured through a Section 106 legal agreement.



5 PLANNING ASSESSMENT

PRINCIPLE OF DEVELOPMENT

- 5.1 In terms of the spatial strategy under the provisions of the Core Strategy, policies CP1 and CP3 set out the Council's strategy to the delivery of development and which broadly aligns with government policy within the NPPF such that the intent is to direct development to sustainable locations; and deliver attractive and well-designed new homes which contribute to the local community. The focus of new development should be within strategic development locations and settlements that either have or are planned to have a significant range of facilities and services. The scale of development should reflect the existing or proposed levels of facilities and services available, with a hierarchy of settlements ranging from major through to modest and limited development locations. Outside of defined settlements, policy seeks to allow certain types of development which is appropriate, primarily relating to agriculture, open recreation, burial grounds and the rural economy.
- 5.2 Policy CP9 seeks to set out the scale and location of development proposals with its development limits defined by Policy CC02 of the Wokingham Borough Managing Development Delivery Document and shown on the Policies Map. Riseley falls within a category described as a 'Limited Development Location'. In such locations (and elsewhere) the scale of development proposed is expected to reflect the existing or proposed levels of facilities and services at or in the location, together with their accessibility. The objectives of the policy clearly follow the intentions of the NPPF in seeking to guide development to locations where travel is reduced and a choice of sustainable travel mode is likely to be available. We are content that this policy CP9 is consistent with the NPPF and should be regarded as being up to date.
- 5.3 It is a policy that, nevertheless, accepts that some development is acceptable in the Parish and that even Limited Development Locations offer the potential for development consistent with the scale of the village. The approach in the NPPF underlies the spatial strategy found in the Development Plan. Core Strategy Policy CP9 requires the scale of new development to reflect the proposed or existing level of



services at or in a location. To this end, Riseley is identified as one of nine Limited Development Locations. This is illustrative of the services it offers, and places it in the third tier of settlements in the Borough, beneath Major and Modest Development Locations, where services are more extensive.

- 5.4 This position is supported by Core Strategy Policy CP17, which concerns housing delivery. It states that over the plan period there should be 100 houses delivered within the Limited Development Locations, with sites generally not exceeding 25 units (it is not disputed that the proposal is over this threshold). As clarified by previous Inspectors, the thrust of this policy is to ensure new housing is in some way proportionate to the services a settlement offers, thereby stimulating the survival of those services but not overwhelming them. This is clearly an illustration of the service provision and the status of Riseley in this regard. However, this policy (CP17) reflects a housing delivery position which is out of date, and which has not responded to the housing requirement since the adoption of the Core Strategy in 2010 and pre-dates the NPPF. Equally, this policy cannot be relied upon where the Council presently can only demonstrate a **2.5 year** housing land supply, thereby illustrating that the Development Plan is not even close to demonstrably meeting the housing needs of the borough.
- 5.5 Policy CP11 in turn deals with development outside identified settlement limits. The objective is clearly stated to be the protection of the separate identity of settlements and maintenance of the quality of the environment. Development which does not fall within a specified range of criteria will 'not normally be permitted'. The use of the word 'normally' implies some discretion and flexibility applies where material considerations might lead to a different conclusion (i.e. the 'flat balance'), it does not suggest that there is a requirement for this balancing exercise only to be carried out of the type envisaged by the NPPF (i.e. 'the tilted balance').

**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.

5.6 This policy is the Council's stated approach to development proposals outside of the settlement limits and, given that the proposal does not pass any of the tests of points 1) to 7) in the policy, we have to conclude that there is some conflict with policy CP11 of the Core Strategy.

5.7 This is not, however, fatal to the assessment of this proposal. For example, the recent approval of 23 houses outside of the settlement boundary of Hurst², another Limited Development Location, which the Council refused because it was contrary to CP11 but was subsequently allowed at appeal. Similarly, and which has been identified above at paragraph 1.15, a far larger scale development of 81 new dwellings was allowed at appeal at Land west of Trowes Lane and north of Charlton Lane, Swallowfield³, again a Limited Development Location settlement.

² APP/X0360/W/24/3342812 - Land between School Road and Orchard Road

³ APP/X0360/W/24/3340006 - Land west of Trowes Lane and north of Charlton Lan



5.8 In the Hurst decision, the Inspector concluded that there wasn't a conflict with the **aims** of the policy and therefore, despite being outside of the settlement boundary and not satisfying any of the criteria of points 1) to 7), it didn't conflict with the aims of the policy:

"9. However, that policy says that 'in order to protect the separate identity of settlements and maintain the quality of the environment' development outside Development Limits will not normally be permitted. Whilst there appears to be an assumption that a proposal outside of the Development Limits would contravene one or both of those aims, if the specific issues around a case meant it did not, then the policy would not be contravened and there would be no need to comply with any of the certain circumstances given".

"86. Turning to whether the most important policies are out of date, as I read it 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 any such development would not conflict with its purpose. Although that brings some flexibility, it is nonetheless more proscriptive than the Framework in regard to proposals outside of settlements, and so the weight I attach to the development plan conflict is reduced somewhat. MDD Policy TB21 though seems less flexible, especially in relation to its second point, and to my mind goes beyond the more nuanced position in the Framework concerning development in the countryside. However, Core Strategy Policies CP1, CP2, CP3 and CP6 are a local reflection of the thrust for sustainability found in the Framework".

5.9 As such, we are of the view that there are two important tests:

- **Does the proposal undermine the need to protect the separate identity of settlements?**
- **Does the proposal maintain the quality of the environment?**

5.10 In terms of the first question, the proposed development, as demonstrated within this Statement and accompanying detailed Design and Access Statement, is contiguous with the settlement boundary of Riseley on two boundaries, effectively the existing village wraps around the development site. The application site will extend the southwestern



part of the village but only inasmuch that it takes it closer to the naturally defensible boundaries to the west and south. The proposal will be viewed in the context of the village and will have the feel of being part of Riseley. It therefore does not fail the first test.

- 5.11 Turning to the second test, the ‘quality of the environment’ - this is not the same test as considering the visual impact/landscape impact. If anything, it is more a consideration of the character of the area which we have concluded elsewhere in this Statement and the detailed character analysis set out in the Design and Access Statement as being in keeping with residential development in a residential area and incorporates green biodiverse corridors. The proposal will maintain the quality of the environment. On this basis, the proposed development, despite being outside the settlement boundary of Riseley, is not contrary to the aims of policy CP11.
- 5.12 Nevertheless, we have to accept that the Council have found through the identification of Riseley as a third tier settlement as having only basic facilities and services in the village (village hall with tea room and public house) and the nature of the bus service, means that any development in or near the village would result in some reliance on private motorised transport, as residents must travel further afield to access what is not provided locally. This has been concluded by the Council elsewhere in the borough as being contrary to Core Strategy Policies CP1 and CP6, which together seek to direct development to sustainable locations where there is transport choice. However, material to this case is the development at St Legers Way which was concluded by Hart to be sustainably located. Also material is the government’s directive to remove fossil fuel vehicles from the market, therefore there will be an increase in electric vehicles and the reliance of the private vehicle can no longer be assumed to be an unsustainable mode of transport, as per Annexe 2 of the NPPF.
- 5.13 Importantly, and material to the assessment of this application, the location of development outside a settlement boundary has not been consistently fatal to the outcomes of appeals. Indeed, that has been confirmed in the explanation of the appeal



decision at Hurst already mentioned⁴. In that case, the Inspector was clear at paragraphs 90-92 that development outside settlement boundaries in the face of a housing land supply shortage does not demonstrably outweigh the benefits:

“90. 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. ”

“91. Accordingly, I acknowledge the scheme would give rise to some harm and development plan conflict, but I conclude that its adverse impacts, even if taken together, do not significantly and demonstrably outweigh the benefits that would arise. Therefore, planning permission should be granted.”

“92. In making this judgement, I accept that the Lodge Road decision reached a different view. However, that was for an appreciably larger development, that had a different relationship to the settlement’s services and its built form. As such the relative weights attributed to the scheme’s benefits and adverse impacts would not have been the same” The decision maker will again note the reference in paragraph 92 above to the scale of development. Not the “significant” development referred to in paragraph 110 of the NPPF”.

5.14 From this section we can conclude that there is some policy conflict in terms of the sustainability of the location and that the proposal fails the tests of policy CP11 (1) to (7) albeit the proposed development doesn’t conflict with the aims of the policy. However, it remains necessary to address the planning balance and this is discussed later.

⁴ APP/X0360/W/24/3342812 Land between School Road and Orchard Road, Hurst



LANDSCAPE

- 5.15 The site falls within two landscape character areas, the I2: Riseley Farmed Clay Lowland landscape character area and L3: Stanford End Wooded Sand and Gravel Hills as described in the Wokingham Borough Landscape Character Assessment 2019. The former landscape area is characterised by arable farming in large open fields bounded by hedgerows. Rural lanes are often narrow and lined with verges containing ditches and mature trees. There are occasional small blocks of woodland. Whilst the latter landscape is noted as a *“topographically distinct area of higher ground characterised by sparse settlement linked by sunken rural lanes. The area is predominately used for arable farming with a strong network of low hedgerows, interspersed by heathy woodland blocks. An isolated and rural character bisected and disturbed by the busy A33”*.
- 5.16 The countryside around Riseley is not a ‘valued’ landscape in the sense used in paragraph 187 of the NPPF. It does retain a rural character and is recognised in the landscape character assessment as having some valuable landscape attributes.
- 5.17 The site currently forms a pastoral field on the southwestern edge of Riseley, surrounded by trees and woodland to the south and west and residential development to the north and east.
- 5.18 Development of the site with housing would inevitably change its contribution to the landscape by introducing built development on what is currently pastoral land, therefore there will be some harm. The introduction of a new access into the site and widening of the junction of Sun Lane with Basingstoke Road would also erode some of the rural character. However, mitigation is proposed, including new native shrub and hedgerow together with tree and wildflower planting. The development would have the effect of extending the built form of the village further southwest into the countryside however, importantly, due to the enclosed nature of Sun Lane and Bull Lane, the visual impact of the change will be limited with the effect on the landscape largely confined to the site itself. The impact on the character and appearance of the countryside outside the immediate southern environs of the village would therefore be negligible.



- 5.19 We can conclude that the proposal would cause some harm to the landscape by reason of introduction of built form and therefore there would be some conflict with Policies CP1 and CP3 of the Core Strategy and Policies CC03 and TB21 of the Local Plan, which seek to retain or enhance the condition, character and features that contribute to the landscape, but that harm is only to the very limited extent outlined above.
- 5.20 As already set out earlier, Policy CP11 is not applicable in respect of assessment of visual landscape impact.

TRANSPORT AND ACCESS

- 5.21 The consideration here turns on two points – the physical access works proposed; and transport implications arising from the development.
- 5.22 Chapter 9 of the NPPF seeks to promote sustainable transport and opportunities to promote walking, cycling and public transport should be identified and pursued.
- 5.23 NPPF states in paragraph 83 that, *“To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.”*
- 5.24 Paragraph 110 states *“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”*.
- 5.25 Paragraph 111 states that:



“a) support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities;

b) be prepared with the active involvement of local highways authorities, other transport infrastructure providers and operators and neighbouring councils, so that strategies and investments for supporting sustainable transport and development patterns are aligned;

c) identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development; provide for attractive and well-designed walking and cycling networks with supporting facilities such as secure cycle parking (drawing on Local Cycling and Walking Infrastructure Plans);

5.26 Paragraph 116 states that *“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios”.*

5.27 In terms of access works at the junction of Sun Lane and Basingstoke Road, this falls to be considered by Hart District under their policy INF3. This policy is broad in its remit, addressing matters of transport (not relevant in this case) but this policy also states that development will be supported where it *inter alia*:

a) integrates into existing movement networks;

b) provide safe, suitable and convenient access for all potential users;

f) do not have a sever impact on the operation, safety or accessibility of the local or strategic highway networks;

g) mitigate impacts on the local or strategic highway networks, arising from the development itself or the cumulative effects of development; and h) protect and where possible enhance access to public rights of way.



- 5.28 Conversely, the transport implications arising from the development falls within the ambit of Wokingham policy CP6 which allows for development where *inter alia*, it is *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; Mitigate any adverse effects upon the local and strategic transport network that arise from the development proposed; and Do not cause highway problems or lead to traffic related environmental problems.*
- 5.29 The Council and consultees are directed to the detailed access drawings and Transport Statement prepared by Apex.

Sustainable Location and Accessibility

- 5.30 The site is contiguous on two sides with the settlement boundary of Riseley. In terms of access to facilities and services, Riseley includes a village hall with tea room and public house. The village of Swallowfield, located approximately 1.6km to the north of Riseley includes a public house, a church, a modern village hall, a recreation ground with play equipment, a small shop, and a general medical practice.
- 5.31 While there are some employment opportunities in or around the edge of the village, most villagers are likely to find employment elsewhere, unless they work from home. These needs, as well as access to higher order facilities and services such as secondary and post-16 education, larger convenience and comparison shopping, and leisure, require the local community to travel to centres some distance away, such as Reading. However, the Transport Statement concludes that the site is situated in a location which makes it possible for some journeys to be made by foot or cycle thereby encouraging some trips to be made by this mode and reduce the reliance on the private car. Further, the site has reasonable connectivity to facilities via a regular bus service.
- 5.32 In the appeal case at Swallowfield⁵, the Inspector concluded that the proposal in that case would conflict with Policies CP1, CP3 and CP6 of the Core Strategy because it would occupy a location that is not as accessible for a development of this scale as required by

⁵ APP/X0360/W/24/3340006 - Land west of Trowes Lane and north of Charlton Lane, Swallowfield



the spatial strategy, but that conflict was lessened because of the basic facilities and services that are available in the village. It is therefore concluded that it is only logical to come to a similar position in this case.

5.33 Moreover, the Transport Statement quite rightly identifies that the connectivity of the site by sustainable modes of travel and the proximity of facilities has been concluded to be acceptable for the development to the south of Riseley (Ref: 16/02989/OUT) which was determined by Hart District Council, and to which no objection was raised from Wokingham. Due to the close proximity of the sites, it would be illogical for the Councils to come to any other conclusion.

5.34 We can therefore conclude that the development accords with NPPF paragraph 83 and local plan policy CP6 of the Wokingham Core Strategy.

Trip Generation and Highway Impact

5.35 The Transport Statement has assessed the likely trip generation arising from the proposed development of up to 44no. new dwellings utilising TRICS database, an accepted industry standard, and assesses the worst-case scenario.

5.36 The assessment concludes that the proposed development is forecast to generate 25 two-way vehicular movements during the AM and PM network peak hour equating to approximately one vehicle every 2-3 minutes on average. Overall, however, the proposed development is forecast to generate 199 two-way vehicle movements, and which can be accommodated within the existing network capacity.

5.37 In terms of proposed highway works, the application proposes amendments to the existing Sun Lane junction with Basingstoke Road together with the realignment of Sun Lane to provide an access road, with adjacent footway, which connects into the site. Additionally, it is proposed to extend the existing driveway of Coldharbour Cottage (wholly within the highway boundary) on its existing alignment to tie into the improved Sun Lane. This extension to the driveway can be delivered with visibility splays of 2m x 25m,



- 5.38 Internally, the configuration of the layout is indicative only however, it nonetheless has been assessed ensuring permeability and legibility. Consideration has also been given to parking standards set out in the Wokingham Borough Council Parking Standards Study report (2011) based on the indicative housing mix presented earlier in this Statement, demonstrating that compliance can be achieved.
- 5.39 Separately, the development can accommodate secure cycle parking and provision of electric vehicle charging on curtilage.
- 5.40 Setting the development into the terms of the NPPF, the development would not lead to an unacceptable impact on highway safety or result in a residual cumulative impact on the network which is severe. There is therefore no reason to prevent development on this basis in accordance with paragraphs 110 and 116 of the NPPF. The development also accords with Wokingham policy CP6 and Hart District policy INF3.

HERITAGE

- 5.41 Scheduled Monuments, Listed Buildings and Conservation Areas are all classified as designated Heritage Assets and defined by the National Planning Policy Framework (NPPF). The NPPF defines a Heritage Asset as "*A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing)*".
- 5.42 Whilst Policy CP3 of the Core Strategy and Policies TB24, TB25 and TB29 of the Managing Development Delivery Local Plan set out the planning tests for development which impact on Heritage Assets, these policies only provide general policy requirements. The test for considering the impact on a listed building and the setting of a listed building (applicable to this application) is set out in the Town and Country Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) and therefore, though the generic policy of the Development Plan and the National Planning Policy Framework must be taken into account, the statutory tests of the aforementioned Act are of most relevance.



5.43 Listed buildings benefit from the highest level of protection under the provisions of The Act. Within the definition of listed buildings, the majority are grade II (approximately 92%) with only the top-rated buildings grade I or II*. Paragraph 1(3) of the Act explains that *“In considering whether to include a building in a list compiled or approved under this section, the Secretary of State may take into account not only the building itself but also—*

- a) any respect in which its exterior contributes to the architectural or historic interest of any group of buildings of which it forms part; and*
- b) the desirability of preserving, on the ground of its architectural or historic interest, any feature of the building consisting of a man-made object or structure fixed to the building or forming part of the land and comprised within the curtilage of the building.”*

5.44 Section 16(2) of the Act then sets out the basic legal test for the decision maker requiring that *“in considering whether to grant listed building consent for any works the local planning authority or the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses”*.

5.45 Advice for the decision maker is set out separately at Paragraphs 207 to the NPPF which requires *“an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance”*. In this regard, the LPA and stakeholders are directed to the Applicant’s Historic Environment Assessment prepared by AC Archaeology.

5.46 Once an assessment on significance and setting has been undertaken, the NPPF further requires at paragraph 212 *“When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm,*



total loss or less than substantial harm to its significance” (bold emphasis added).

The government is clear of the importance and weight to be attributed to heritage assets.

- 5.47 Paragraphs 213 to 215 then set out the test to determine the degree of harm arising from the development proposed. This sliding scale considers substantial harm (the most harm) or alternatively, less than substantial harm.
- 5.48 The Applicant’s Historic Environment Assessment identifies at paragraph 4.1 – 4.15 the heritage assets, both built and archaeological assets, affected by the proposed development. The assessment then proceeds to identify the significance of each asset and the effect of the proposed development (beneficial or harmful) on that identified significance or the ability to appreciate it.
- 5.49 In respect of below ground archaeology, there is moderate archaeological potential due to the site’s proximity to an important Roman road and its location between a possible Romano-British roadside settlement site to the west and a known Iron Age settlement to the southeast. In this regard a precautionary approach to construction works can be secured by condition.
- 5.50 Turning to the nearest listed buildings, it is concluded that the development will likely result in a negligible negative change to the significance of the Grade II listed Pound House, and a minor negative change to the significance of the Grade II listed Coldharbour Cottage.
- 5.51 As mentioned variously throughout this statement, the application is submitted in outline and therefore the assessment of effect on the identified heritage assets is based on the illustrative masterplan. It will be necessary for a more detailed analysis to be undertaken at Reserved Matters stage however, there is sufficient detail to allow the Council to undertake their assessment. In drawing the assessment of harm into the ambit of the NPPF paragraph 215 and 216, the development falls into the *Less than Substantial Harm*. Applying within that scale a minor, moderate or major degree of harm, we conclude that the proposed development will have Less than Substantial harm



within the upper limit of minor on the historic environment. In accordance with NPPF paragraph 215 this harm should be weighed against the public benefits accrued by the proposal. This is set out within the Planning Balance section of this statement.

TREES, ECOLOGY AND BNG

Trees

- 5.52 Chapter 15 of the NPPF includes policies that seek to conserve and enhance the natural environment. Paragraph 187(b) states the wider benefits of natural capital and ecosystem services should be recognised, including the economic and other benefits of the best and most versatile agricultural land, as well as trees and woodland. NPPF paragraph 193(d) states *that development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists.*
- 5.53 At a local level, policy CCO3 advises that development should, amongst other things, protect and retain existing trees, hedges and other landscape features.
- 5.54 The accompanying tree survey has identified a total of thirty-three trees, nine groups and two hedges on site. Of these, one tree is identified as Category A (T13) with the majority identified as Category C. The important role trees play to biodiversity has informed the indicative layout, ensuring that no Category A or B trees are lost as a result of the proposed development. Similarly, the indicative layout has considered the need to protect root protection areas. In this regard, the proposed highway works will fall within the RPA of a Category B tree (T29) and therefore, the applicant proposes a ‘no dig’ construction method to mitigate against potential harm and loss.
- 5.55 Overall, the impact on trees has been demonstrated as avoided. Where there is potential for harm (as in the case of tree T29) this can be mitigated, and which can be controlled by an appropriately worded planning condition. The development accords with NPPF paragraphs 187(b) and 193(d) and with local policy CCO3.



Ecology

- 5.56 The site is comprised of predominately two pastoral fields with hedgerow field boundaries and a belt of trees effectively running centrally through the site. The site has been assessed for protected species and habitat.
- 5.57 The nearest designated site is located approximately 1.1km from the site (Stanford End Mill and River Loddon SSSI). The site is also located within the 5km buffer zone of Thames Basin Heath Special Protection Area. Core Strategy policy CP8 advises that Development which alone or in combination is likely to have a significant effect on the Thames Basin Heaths Special Protection Area will be required to demonstrate that adequate measures to avoid and mitigate any potential adverse effects are delivered. A Shadow Habitat Regulations Assessment (HRA) was completed in September 2025 given the site's proximity to the Thames Basin Heaths Special Protection Area and this has been submitted in support of this application. The Shadow HRA concludes that the proposed development, due to proximity to the Thames Basin Heaths SPA may lead to likely significant effects alone or in combination from recreational pressure. In this regard, and in accordance with the Council's guidance, it is anticipated that a contribution toward the Council's Suitable Alternative Natural Greenspace (SANG) and Strategic Access Management and Monitoring (SAMM) will be required.
- 5.58 The site is immediately bordered by a parcel of ancient woodland to the north, and a parcel of priority deciduous woodland to the south-west. In terms of impact on the ancient woodland, the proposed development is separated from this protected area by Bull Lane. Additionally, it is illustrated through the illustrative masterplan that a buffer can be delivered along this western boundary.
- 5.59 In terms of protected species, relevant surveys have been carried out or have been programmed for the next available season. There will be inevitable loss of habitat as a result of the development however, the full details are not known at this outline stage and as such mitigation and compensation measures are proposed, including the submission of a Landscape and Ecological Management Plan (LEMP), Construction and Environmental Management Plan (CEMP); bat boxes; and dormouse nest boxes which



can be controlled by condition. The future reserved matters application will include a bat sensitive lighting assessment to ensure that any lighting within the development is provided in accordance with the standards published by the Institution of Lighting Professionals. In this regard, it is concluded that the development accords with NPPF paragraph 193 and local policies CP7 and CC03.

Biodiversity Net Gain

- 5.60 The Environment Act 2021 introduced the mandatory requirement for sites to deliver a 10% net gain of biodiversity. This is supported through the NPPF at paragraphs 187(d), 192(b) and 193(d).

“minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures”. (para 187(d))

“promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity”. (para 192(b))

“development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate”. (para 193(d))

- 5.61 At a local level, Policy CP7 predates the mandatory requirement ushered in via the Environment Act but remain clear that nature protection is important.
- 5.62 The application is supported by a Biodiversity Impact Calculation report and Metric which reflect the Outline nature of this application based on the indicative masterplan. The calculation concludes that the proposed development will result in a likely net loss of -8.98 habitat units (-59.54%) and a likely loss of -0.18 hedgerow units (-4.54%). The



creation of 11.14 habitat units of other neutral grassland and 0.58 hedgerow units will be required to achieve the 10% net gain threshold and satisfy the trading rules.

- 5.63 The scheme, as shown illustratively on the masterplan, incorporates a range of on-site habitat creation and enhancement measures, including the creation of areas neutral grassland in good condition within public open space; new areas of mixed scrub planting; planting of urban trees within the development; and the retention and minor enhancement of existing native hedgerows.
- 5.64 The metric calculation will be updated during the Reserved Matters stage to reflect the final site layout and which will also demonstrate the measures which can be provided on site or off site. This information can be secured through an appropriately worded planning condition or legal obligation. There is sufficient detail within this submission to demonstrate compliance with the NPPF and policy CP7.

FOUL AND SURFACE WATER DRAINAGE

- 5.65 The site falls entirely within Flood Zone 1, which is classed as at low risk from pluvial and fluvial flooding. Due to the site area, it is nevertheless necessary for the application to be supported with a Site-Specific Flood Risk Assessment and the council and consultees are directed to this accompanying document.
- 5.66 NPPF paragraph 182 advises that *“Applications which could affect drainage on or around the site should incorporate sustainable drainage systems to control flow rates and reduce volumes of runoff, and which are proportionate to the nature and scale of the proposal. These should provide multifunctional benefits wherever possible, through facilitating improvements in water quality and biodiversity, as well as benefits for amenity. Sustainable drainage systems provided as part of proposals for major development should:*
- a) take account of advice from the Lead Local Flood Authority;*
 - b) have appropriate proposed minimum operational standards; and*
 - c) have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development”.*



- 5.67 Local Policy CC10 requires all development must ensure that surface water drainage must be managed in a sustainable manner; reproduce greenfield run-off rates; incorporate SuDS and not cause adverse impacts to the public sewerage network.
- 5.68 The Environment Agency flood mapping for planning indicates that the site is not at risk from surface water flooding however some sections of Sun Lane and Bull Lane, which are lower lying, are susceptible to flooding.
- 5.69 The site has been assessed on the basis of the indicative layout to ensure that drainage can be managed on-site prior to discharge. In this regard, attenuation features will be sized to accommodate runoff including an up to 100 year event with allowance for climate change and for urban creep to the domestic catchment.
- 5.70 As noted earlier in this statement, the detail of the drainage solution is predicated on the final design and layout, which will come forward as a Reserved Matter. In terms of foul sewerage strategy, it is intended that the proposed development will be served by a new adoptable foul sewer network with pumped flows discharging to the adopted foul sewer network within Basingstoke Road. In terms of the strategy for surface water, this is to be attenuated on-site then pumped to the western edge of site, where a new adoptable gravity system will convey flows off-site to the east, towards the ordinary watercourse adjacent the Devil's Highway which outfalls to Long River. The final details for foul and surface water drainage will be determined at Reserved Matters stage, however there is sufficient detail within this submission to demonstrate compliance with the NPPF and local policy CC10.

GROUND CONDITIONS

- 5.71 NPPF paragraph 196 notes that planning decisions should ensure that:

“a) a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination. This includes risks arising from natural hazards or former activities such as mining, and any proposals for mitigation including land remediation (as well as potential impacts on the natural environment arising from that remediation);



b) after remediation, as a minimum, land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990; and

c) adequate site investigation information, prepared by a competent person, is available to inform these assessments”

5.72 There are no specific policies at local level which address the potential for pollution however, good practice is to ensure that that development does not result in pollution which is detrimental to quality of life or poses unacceptable risks to health and the natural environment.

5.73 The application is supported by a Phase 1 Geo-Environmental and Geotechnical Risk Assessment. This identifies potential on-site and off-site sources of pollution and the potential pathway to sensitive receptors, concluding that the risk to human health and controlled waters is currently low and which can be mitigated through the design, at Reserved Matters. This can be controlled by appropriately worded planning conditions.

RESIDENTIAL AMENITY

5.74 The proposed new dwellings will meet the Nationally Described Space Standards and provide external space standards of appropriate size and which will be demonstrated through future reserved matters. Each property will benefit from parking, together with bin and bike stores, as set out within the Council’s Borough Design Guide Supplementary Planning Document. In this respect, the amenity standards for new occupants will be acceptable.

5.75 In terms of residential amenity of occupants of existing properties immediately adjacent to the site, the indicative layout illustrates that in respect of the relationship between the site and those properties to the north, within Yeosfield, there will be a very generous separation distance with proposed amenity open space delivered along this boundary. This amenity open space also captures the western boundary of Pond House (listed building) and not only does this maintain the setting of this asset, it equally provides a buffer from development. The relationship between the proposed development and



the dwellings on Basingstoke Road, it is proposed that private rear gardens will back onto the private gardens of those existing property. Whilst the proposed development will result in a change to the outlook from these properties along Basingstoke Road and Yeosfield, there is no protection through the planning system to a view. The change in outlook must therefore be weighed against the benefit of delivering much needed market and affordable housing.



6 PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT (TILTED BALANCE)

6.1 Given the identified policy conflict, we therefore present the Council with a compelling case for why planning permission should, nevertheless, be granted Outline planning permission.

6.2 When considering development outside of development limits, Core Strategy Policy CP11 sets out exceptions where proposals will be supported. Whilst the proposed development does not meet these criteria, regard should also be given to the Council's housing land supply position, which is a material planning consideration in determining planning applications.

6.3 Indeed, a key driver of the NPPF is of course to significantly boost the supply of homes, stating that:

"To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay."

6.4 Paragraph 78 of the NPPF continues that Councils must maintain a 5-year supply of housing sites:

"Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old".

6.5 At the time of writing Wokingham's housing land supply is reported to be **2.5 years** (as of March 2025) as shown in the extract from the Council's Five Year Housing Land Supply Statement 31 March 2025.



Table 4.1. Housing land supply at 31 March 2025 (LHN 1,316)

House Land Supply Category	Number of Dwellings Needed
Housing need at 1,316 homes per annum 01/04/2025 – 31/03/2030	6,580
Housing need plus 5% buffer for period 01/04/2025 – 31/03/2030	6,909
Annual rate for 5 years plus 5% buffer	1,382
Total deliverable housing supply for period 01/04/2025 – 31/03/2030	3,453 ²⁹
Total deliverable housing supply in years for period 01/04/2025 – 31/03/2030	2.5 years

6.6 This falls significantly short of the five-year supply of deliverable homes that is required under the provisions set out in the NPPF. As such the Council's policies for delivering housing development (which includes CP1 and CP6 and, importantly, CP11) are out of date and the tilted balance set out under NPPF paragraph 11(d) is engaged. This states that:

- *Where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*
 - i. *the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed (footnote 7); or*
 - ii. *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.*



- 6.7 The lack of a five-year housing land supply has not been disputed by the Council at appeal elsewhere in the borough.
- 6.8 The first test for the decision maker is whether there are any ‘footnote 7’ reasons which would provide a strong reason for refusal (para. 11d)i). The only possible issue here is that of heritage. This is fully assessed in the accompanying Heritage Statement which concluded less than substantial harm (at the lower end of minor) and therefore it is necessary to consider this harm and weigh it against public benefits accrued. There is however no strong reason for refusal.
- 6.9 One of the negative issues raised relates to the site’s location and whether this is conducive to minimising the reliance on the private car to access services and facilities. Future residents can safely access the village and its services, including bus stops, via existing and proposed footways. Nonetheless, there would be some reliance on private vehicles, although the site does have access to some transport options and local facilities.
- 6.10 NPPF at paragraph 110 states that opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in decision-making. In any event, it is evident that the site is not wholly in an unsustainable location given it is on the edge of a third tier village in the Settlement Hierarchy, and this should be considered within the planning balance. Further, the development at St Legers Way was determined to be sustainable.
- 6.11 Moreover, the whole reason for applying the tilted balance is that there is an agreed position that the development plan is not able to deliver the necessary number of houses. If the housing demand could be delivered in the built up areas and on strategic sites, then there wouldn’t be a **2.5-year deficit**. Put another way, the only way that the Council will get towards the required 5-year land supply target is to deliver new houses which are contrary to policy; namely in the countryside. The countryside is, by definition, less sustainable than built up areas – this should not prevent development being approved as a matter of principle. The sustainability of the site is merely one consideration in the planning balance; and in this case, a tilted balance which



emphasises housing delivery. Equally, it is identified within the council's emerging Local Plan that they are reliant on a stepped trajectory and as such are unlikely to meet their housing requirements within the short term.

6.12 On this basis, if the tilted balance is correctly applied, then planning permission should be granted unless the decision maker concludes that “any adverse impacts of doing so would significantly and demonstrably outweigh the benefits”. The application is supported by an array of technical documents and assessments concluding:

- Landscape – impact to the landscape character is localised and will be contained by the existing defensible boundaries. The scale and nature of the proposal and its position contiguous with the settlement boundary on two sides, and therefore adjacent to other built form will have an overall weighted landscape impact that could be considered small as they are not uncharacteristic when set within the attributes of the existing landscape.
- Ecology Report confirms that there is no harmful impact on Ecology resulting from the proposal and mitigation measures can be included into the design.
- Biodiversity Net Gain calculations demonstrate how BNG can be delivered as a combination of on and off-site
- Transport Statement considers that there is no highway safety impact
- Flood Risk Assessment concludes that there is no threat to future residents and that the proposal will not result in flooding elsewhere. Indeed, the accompanying surface water drainage strategy confirms surface water can be managed on site prior to discharge off site.
- Tree Impact Assessment confirms limited impact to trees to be retained, and such impact can be mitigated.

6.13 Policy CP5 expects a housing mix to be provided on the site. Other policies of the development plan require that proposals conform with the prevailing characteristics of the area which, in this case, is detached houses on good size plots. An indicative mix



has been considered and the masterplan illustrates that this development can deliver a cross section of house size and type. Policy CP5 also demands that a proposal of this size and location must deliver 40% affordable housing. The application is submitted based on a fully policy compliant affordable housing offer.

6.14 Finally, a material consideration is of course the impact on neighbours. Given the separation distances and orientation to neighbours based on the indicative layout, the proposal would not result in any loss of amenity to these neighbours.

6.15 Having set this context, the tilted balance of paragraph 11d)ii) is applied in the concluding section below.



7 CONCLUSION

- 7.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with the Development Plan unless material considerations indicate otherwise. We have identified that there is some conflict with policies CP1, CP6 and CP11 of the Core Strategy.
- 7.2 Wokingham Council has a **2.5 year housing land supply** which means that there is a danger of serious and substantial under delivery of housing in the foreseeable future even with an emerging Local Plan. The provision of 44no. new homes with policy compliant on-site affordable housing would make a meaningful contribution to addressing this significant shortfall. The provisions of paragraph 11d) of the NPPF are specifically in place to address this shortfall and ensure that the housing crisis doesn't accelerate whilst councils do not have up to date local plans. We have demonstrated that there is no 'footnote 7' reason why planning permission should be refused and therefore the tilted balance of paragraph 11d)ii) is engaged.
- 7.3 Whilst we have identified a conflict with the tests of policy CP11 which governs development in the countryside, there is no conflict with the aims of the policy and the provision of new homes in Riseley is broadly consistent with the adopted spatial strategy.
- 7.4 There will be some visual impact, the inescapable truth of any application on a greenfield site. The harm is on the lower end of the spectrum and is limited to the immediate site environment, which can therefore only be attributed limited weight against the application.
- 7.5 In terms of the site's accessibility to services, the location of the site does make it more reliant on the private car. However, Riseley is not entirely absent of services, and where they are needed more are available without the need for long car journeys. Whilst this does weigh against the proposal, there must be an acceptance that urban and rural settlements will perform differently, as per paragraph 110 of the NPPF. It is also inevitable that any development will encroach into the countryside and because this



goes to the heart of whether the principle is acceptable. We therefore afford this conflict limited weight also.

7.6 There would be public benefits to the scheme. These would include:

- The provision of up to 44no. houses within a location that would not be unsustainable. There would be a boost to housing supply within the context of a 5YHLS of 2.5 years. This matter must carry significant weight.
- The provision of policy compliant 40% on site affordable housing which carries significant weight.
- The properties could incorporate more sustainable methods of heating and power, with reduced water consumption. There would be direct and indirect economic benefits due to the scale of this development. We afford this moderate weight.
- There would be biodiversity net gain however some may be provided off- site and therefore is afforded minor weight.
- The development would provide a contribution towards CIL. These benefits are afforded moderate weight.

7.7 When these identified benefits are balanced against the harm it is evident that the benefits far outweigh the harm. Where a positive presumption to granting planning permission is applied, it is reasonable to conclude that this is a perfect site to deliver development of the nature proposed. It is a development which is appropriate to the size of the settlement and appropriate to its site itself.

7.8 By applying the presumption in favour of sustainable development, planning permission should be granted as soon as possible.



APPENDIX A – NEIGHBOUR LETTER

Owner/ Occupier

Date

Dear Resident,

3WEST GROUP AND THE WELLINGTON ESTATE PROPOSALS FOR LAND NORTH OF SUN LANE, RISELEY

3West Group and the Wellington Estate are writing to inform you that we are submitting an Outline Planning Application for the construction of up to 44 houses with all matters reserved except for access to Wokingham Borough Council and Hart District Council. We are writing to you as the application site adjoins the boundary of your property or is very close to it.

The application site straddles two Council administrative areas. The majority of the site falls within Wokingham Borough whilst the access to the site falls within Hart District. For this reason, we are required to submit two identical applications to the respective council.

The application will be an outline planning application, which means that the layout and landscape, along with the scale, appearance and material of the proposed houses will be determined at a later stage should outline planning permission be granted. However, the proposed access road into the site will be considered as part of the outline planning application.

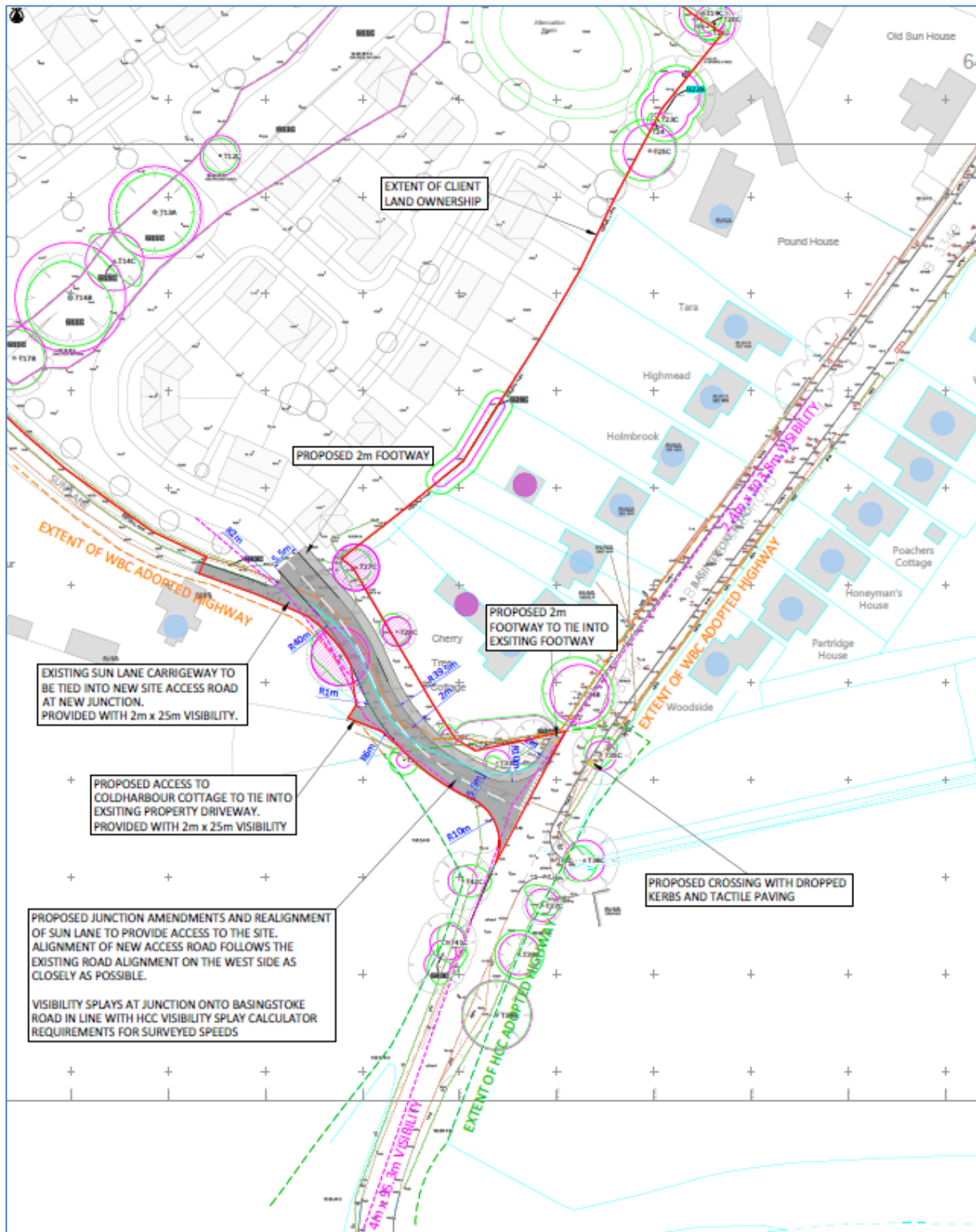
We have sought technical advice from transport, ecological, heritage, design, arboriculture, landscape, engineering, foul, surface water and flooding consultants to inform this considered proposal. Known constraints and potential opportunities have influenced an indicative masterplan which will accompany the planning application. It will demonstrate to the Councils that the site can adequately accommodate up to 44 houses, along with internal roads, car parking and public open space.

An extract of the masterplan is shown below:

BUCKINGHAMSHIRE	CORNWALL	DEVON	HAMPSHIRE	HERTFORDSHIRE	LONDON	SUSSEX
01494 326 277	01726 210 341	01392 539 720	01256 766 673	01582 345 230	020 3960 1530	01243 218 841



Junction amendments and realignment of Sun Lane are proposed to provide access into the site. These are wholly within adopted highways ownership and follow the existing road alignment as closely as possible. An extract of the proposed site access general arrangement design is shown as follows:



A number of parameter plans will also accompany the planning application which will fix the parameters provided on the site. They will inform the subsequent detailed planning application.



There will be 40% affordable homes provided on site to meet a local need and the site will also provide contributions towards the Community Infrastructure Levy (CIL).

The submission documents that form part of the application will be uploaded to the Council's website of which you will be able to comment upon. You will be informed by the Council when the planning application is advertised for consultation.

If you would like to contact us, you can write to us at: planning@3west.group.

Yours faithfully,

BELL CORNWELL LLP on behalf of 3West Group and the Wellington Estate

KAREN TIPPER
BA(Hons) MA MRTPI
Senior Associate

Owner/ Occupier

Date

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