

**Town and County Planning Act 1990
Section 78 (As Amended)**

**OVERARCHING STATEMENT OF
COMMON GROUND**

Prepared by:

**Woolf Bond Planning LLP
for Dandara Southern Ltd & Elstree Land Ltd**

and

Wokingham Borough Council



**WOKINGHAM
BOROUGH COUNCIL**



Woolf Bond Planning
Chartered Town Planning Consultants

Land North of Reading Road, Arborfield

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

LPA Ref: 243099

WBP Ref: 9015

January 2026

CONTENTS

1.	INTRODUCTION	3
2.	DESCRIPTION OF THE APPEAL SITE AND SURROUNDING AREA	4
	Context	4
	The Appeal Site	4
3.	RELEVANT PLANNING HISTORY	6
4.	DESCRIPTION OF THE APPEAL SCHEME	7
	Scheme Description	7
	Plans and Particulars	7
5.	PLANNING POLICY	12
	The Development Plan	12
6.	MATTERS NOT IN DISPUTE	17
	Site Location and Description	17
	Relevant Planning History	17
	Relevant Planning Policy	17
	Housing Land Supply	17
	Principle of Development	18
	Local Plan Update (“LPU”) & Loddon Valley Garden Village (“LVGV”)	18
	Best and Most Versatile Agricultural Land	20
	Heritage	20
	Affordable Housing	21
	Open Space	21
	Employment Skills	23
	Thames Basin Heaths Special Protection Area (“SPA”)	23
	Planning Balance	24
7.	MATTERS IN DISPUTE	26
8.	CONDITIONS	29
9.	AGREEMENT: SCHEDULE OF COMMON GROUND	30

1. INTRODUCTION

- 1.1 This Overarching Statement of Common Ground (“SoCG”) relates to a Town and Country Planning Act 1990 Section 78 Planning Appeal lodged by Woolf Bond Planning LLP on behalf of Dandara Southern Ltd and Elstree Land Ltd against Wokingham Borough Council’s decision to refuse an outline planning application for up to 111 dwellings, with associated works, parking, landscaping, publicly accessible open space, with access from Reading Road (LPA Ref: 243099).
- 1.2 The Statement records the matters upon which the parties have agreed and the matters upon which the parties disagree, with the intention of leading to the preparation of more focused proofs of evidence.
- 1.3 Additional Topic based Statements of Common Ground will also be prepared. These are likely to include (i) housing need and land supply and affordable housing need, (ii) flood risk and drainage (including impact on watercourse), (iii) landscape; (iv) arboriculture (including irreplaceable habitats), (v) ecology (including Biodiversity Net Gain), (vi) Thames Basin Heaths Special Protection Area and (vii) highways and transport.

2. DESCRIPTION OF THE APPEAL SITE AND SURROUNDING AREA

Context

- 2.1 The defined settlements of Arborfield Cross (Limited Development Location) and Arborfield Garrison (Modest Development Location) are located approximately 1km and 2km respectively from the Appeal Site (“the Site”). The Site is detached from the defined settlement boundary of either of those settlements and from any other settlement boundary. Boundaries of defined settlements are set out in the Core Strategy (“CS”) Policy CP9 and Managing Development Delivery Local Plan (“MDD LP”) Policy CC02. Arborfield is not a defined settlement in the CS or MDD LP.

The Appeal Site

- 2.2 The Site comprises approximately 6.44 hectares of privately owned fields, a paddock, single storey stables and dilapidated buildings, and a caravan storage area. There are no records showing that the use of part of Ridgefield Farm for storage of caravans benefits from a planning permission. The Site boundaries are demarcated by hedgerows and mature trees to the north-west, west, north- and south, paddocks serving stables to the north-east, with long gardens of large, detached residential dwellings abutting the Site to the south. The western part of the northern boundary abuts landholdings associated with large properties fronting Church Lane to the north. There are open agricultural fields associated with Lockey Farm to the east of the site.
- 2.3 The Topographical Survey shows a field gate to the Site located along Church Lane, to the east of the Merrie Bells. It also shows four access points from Reading Road. Details of the proposed emergency vehicular and pedestrian access points are shown in Appendix MS10 of the Highways Proof of Evidence by the Appellant. The main

vehicular/pedestrian access is shown in the drawing Proposed Site Access 147.0017.0001 Rev P07.

- 2.4 As shown on the Environment Agency Flood Map, a watercourse traverses the western part of the Site running north-south and thereafter is shown running along the southern Site boundary, parallel to Reading Road, towards ARBO19 (Byway Open to All Traffic) to the east. This watercourse is classified as a Main River by the Environment Agency on its Flood Map for Planning.
- 2.5 The Multi Agency Geographic Information for the Countryside Map ('MAGIC') and the Proposals Map indicates that the Site is not covered by any statutory designations for landscape character or quality.

3. RELEVANT PLANNING HISTORY

3.1 The relevant planning history is summarised below:

PLANNING HISTORY		
Application No.	Description	Decision & Date
TP/2001/3728	Proposed temporary permission for use of land as a construction yard.	Refused: 15 June 2001
F/2002/7111	Proposed formation of angling pond with bunds.	Approved: 09 April 2003
VAR/2005/4389	Proposed variation to condition 12 of consent F/2002/7111 to allow a reduction to the visibility splays.	Approved: 24 May 2005
F/2006/6880	Full planning approval for proposed erection of posts and gate as entrance to field and associated dropped kerb	Approved: 24 March 2006
F/2006/7933	Proposed infilling of angling pond and re-grading of the land.	Approved: 19 October 2006
C/2012/0280	Application for submission of details to comply with conditions 3 and 5 of planning consent F/2006/7933. 3. Restoration Scheme. 5. Planning and maintenance scheme.	Approved: 15 May 2012

4. DESCRIPTION OF THE APPEAL SCHEME

Scheme Description

4.1 The Appeal Scheme description is as follows:

“Outline application for the proposed erection of up to 111 no. dwellings with associated works, parking, landscaping, publicly accessible open space and access from Reading Road. (All matters reserved except for means of access.)”

4.2 Only the principle of developing the Site for up to 111 dwellings, and the means of access are to be determined as part of this Appeal. The means of access comprise: main vehicular and pedestrian access, emergency vehicle access and pedestrian/cycle access points onto Reading Road and Church Lane.

4.3 Appearance, landscaping, layout and scale are reserved for subsequent determination.

Plans and Particulars

4.4 The planning application submitted to the LPA included the following documents:

- Application Form Dated 03/12/2024
- CIL Form 1 Dated 03/12/2024
- Covering Letter Dated 02/12/2024 (Woolf Bond Planning)
- Planning Statement (Woolf Bond Planning)
- Location Plan No. 052403-DAN-LOC1
- Indicative Land Use Plan No. 052403-DAN-ILUP
- Illustrative Masterplan No. 052403-DAN-MP01

- Design & Access Statement (DHA Architecture)
- Topographical Survey No. 052403-DAN-TOPO01
- Archaeological Desk-Based Assessment (RPS) 794-PLN-HER-01080 Rev 2
- Biodiversity Net Gain Assessment (Sam Watson Ecology) SWE-P24-0078 Rev R2
- Ecological Impact Assessment & Shadow Habitats Regulation Assessment (Sam Watson Ecology) SWE-P24-0078 Rev R1
- BNG Metric V1
- Sustainability Statement (JSP) Rev a
- Flood Risk Assessment & Drainage Strategy (RCP) DANS-E254-274 Rev 2
- Desk Study & Ground Investigation Report (Wilson Bailey) J2429 Issue 1
- Transport Assessment (PBA) 147.0017-TA Rev 3
- Arboricultural Impact Assessment and Tree Condition Survey (Ruskins) 1024-100809 November 2024
- Utilities Assessment Report (Connect It) MU4578 Rev 1.0
- Landscape and Visual Appraisal GLS_050_171_1000 Rev -

4.5 The following documents were submitted during the application process:

16/12/2024

- Hydraulic Modelling Report (Ardent) 2406660-ACE-XX-XX-RP-C-0321 Rev -

18/02/2025

- Framework Travel Plan (PBA) 147.0019-FTP-1 Rev -

- Framework Construction Management Plan (PBA) 147.0017-FCMP-1 Rev -
- Highways Response Note (PBA) 147.0017-HRN-1 Rev -

19/03/2025

- Emergency Access Plan No. 147.0017.0009 Rev P01
- Refuse Vehicle & Fir[e] Appliance Tracking Plan No. No. 147.0017.0006 Rev P02
- Proposed Site Access General Arrangement Plan No. 147.0017.0001 Rev P07

25/04/2025

- Addendum Bat Survey Report (Sam Watson Ecology) SWE25-0078-BLT1
- Agricultural Land Classification Report (Kernon) KCC3897 April 2025

28/04/2025

- Revised BNG Metric

4.6 Following the submission of the appeal, the following documents have been provided:

19/11/2025

- Appellant's Landscape Proof of Evidence (Clare Brockhurst) containing the following appendices:
 - LP1: Updated Zone of Theoretical Visibility
 - LP2: Baseline Photography

- LP3: Accurate Visual Representations
- Appellant's Planning Proof of Evidence (Brigid Taylor) containing the following appendices:
 - BT1: Statement of Sam Watson, Ecologist, dated 20.10.25
 - BT2: Extract of Environment Agency Flood Risk Map for Planning 19.11.25
- Appellant's Highways Proof of Evidence (Matthew Stevens), containing the following appendices:
 - MS1: Walk/Cycle Catchment Plan
 - MS2: Current Leopard 3 Bus Timetable
 - MS3: Bus Catchment Plan – Education Destinations
 - MS4: Network Map – South Western Railway
 - MS5: Network Map – Great Western Railway
 - MS6: Network Map – Cross Country
 - MS7: Network Map – Elizabeth Line
 - MS8: Bus Catchment Plan – Employment Destinations
 - MS9: Bus Catchment Plan – Healthcare Destinations
 - MS10: Drawing No. 25103/001/Rev C – Enhanced Active Travel Linkages to Local Facilities + Services on Reading Road
- Appellant's Housing Land Supply and Affordable Housing Need Proof of Evidence (Graham Ritchie/ Brigid Taylor)
- Appellant's Arboriculture Proof of Evidence (Peter Wilkins) containing the following appendices:

- Tree Condition Survey
- Tree Survey Plan
- Access Tree Removals Plan
- Peter Wilkins Profile

16/01/2026

- Flood Risk Assessment and SUDS Statement Ref
IEP_001_022_056 Rev 1 (IEP)

5. PLANNING POLICY

The Development Plan

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 sets out a requirement that planning applications must be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 5.2 The relevant parts of the adopted Development Plan comprise the following:
- Retained Policy NRM6 of the South East Plan,
 - Core Strategy (adopted January 2010),
 - Managing Development Delivery DPD (adopted February 2014); and
 - Arborfield and Barkham Neighbourhood Plan (made April 2020) (“ABNP”).
- 5.3 The settlement boundaries as set out within the Policies Map for Wokingham Borough were identified having regard to the spatial strategy and to accommodate at least the housing requirement set out in CS Policy CP17.
- 5.4 While the housing requirement in CS Policy CP17 has been overtaken by events, the settlement boundaries remain part of the adopted development plan until replaced by the Local Plan Update. Their weight is a matter for the decision-maker, having regard to paragraph 11 of the NPPF.
- 5.5 Applicable Development Plan policies comprise as follows:

Saved Policies of the South East Plan

- NRM6 – Thames Basin Heaths Special Protection Area

Core Strategy

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

Managing Development Delivery DPD

- CC01 – Presumption in Favour of Sustainable Development
- CC02 – Development Limits
- CC03 – Green Infrastructure, Trees, and Landscaping
- CC04 – Sustainable Design and Construction
- CC05 – Renewable Energy and Decentralised Energy Networks
- CC06 – Noise
- CC07 – Parking
- CC09 – Development and Flood Risk
- CC10 – Sustainable Drainage

- TB05 – Housing Mix
- TB07 – Internal Space Standards
- TB08 – Open Space, Sport, and Recreational Facilities Standards
- TB12 – Employment Skills Plan
- TB21 – Landscape Character
- TB23 – Biodiversity and Development
- TB24 – Designated Heritage Assets
- TB25 – Archaeology

Arborfield and Barkham Neighbourhood Plan

- IRS1 – Preservation of Separation of Settlements.
- IRS2 – Recognise, Respect and Preserve Identity and Rural Setting of Settlements.
- IRS3 – Protection and Enhancement of the Natural Environment and Green Spaces
- IRS4 – Protection and Enhancement of the Historic Character of the Area
- TC2 – Properly Planned and Designed New Facilities
- TC3 – Conditional Support for Businesses in the Countryside and Agriculture
- AD1 – New Development within Development Limits
- AD3 – High Quality Development with Generous Open Space, Properly Landscaped
- AD4 – Address Local Flood Risk Management
- GA1 – Minimise Additional Traffic on Unsuitable Roads
- GA2 – Implement Local Network of Green Routes for Non-Motorised Users
- GA3 – Public Transport Improvements with Long-Term Viability

5.6 The Council's Local Plan Update was submitted to the Planning Inspectorate for Examination on 28th February 2025. Stage 1 Hearing sessions took place in November 2025. On 17th December the Inspectors issued a letter confirming that the plan can proceed to Stage 2 Hearing sessions.

5.7 In the context of the above, the following draft Local Plan Update Policies are of relevance to the appeal:

- SS1 Sustainable development principles
- SS2 Spatial strategy and settlement hierarchy
- SS4 Development within and adjacent to minor settlements
- SS5 Development in the countryside
- SS10 Meeting our housing needs
- SS13 Loddon Valley Garden Village
- SS15 Securing Infrastructure
- CE1 Design principles for efficient buildings
- CE3 Environmental standards for residential development
- CE4 Supporting a circular economy
- CE5 Embodied carbon
- C1 Active and sustainable transport and accessibility
- C2 Mitigation of transport impacts and highway safety and design
- C3 Active travel
- C4 Green and blue infrastructure and public rights of way
- C5 Parking and electric vehicle charging
- C8 Utilities
- ER4 Employment and skills plans

- H1 Housing mix, density and standards
- H3 Affordable housing
- FD1 Development and flood risk (from all sources)
- FD2 Sustainable drainage
- FD3 River corridors and watercourses
- NE1 Biodiversity and geodiversity
- NE2 Biodiversity net gain
- NE3: Thames Basin Heaths Special Protection Area
- NE4 Trees, woodland, hedges and hedgerows
- NE5 Landscape and design
- DH1 Place making and quality design
- DH2 Safeguarding amenity
- DH5 The historic environment
- DH6 Archaeology
- HC1 Promoting healthy communities
- HC2: Community infrastructure
- HC4 Open space, sports, recreation and play facilities
- HC5 Environmental Protection
- HC7 Light Pollution
- HC8 Noise Pollution
- HC9 Contaminated land and water
- HC10 Odour, Fumes and Dust

6. MATTERS NOT IN DISPUTE

- 6.1 Matters not in dispute outlined below cover a broad range of issues, some of which are intended to be covered in the topic-specific SoCGs. Should the extent of matters in not in dispute change as a result of the production of topic-specific SoCGs, this SoCG will be updated. The following matters are not in dispute:

Site Location and Description

- 6.2 The summary of the Site's location and physical description provided in Section 2.

Relevant Planning History

- 6.3 The relevant planning history provided in Section 3.

Relevant Planning Policy

- 6.4 The policies of adopted Development Plan listed in paragraph 5.5 of this SoCG are relevant to the appeal.
- 6.5 The policies of Emerging Development Plan listed in paragraph 5.7 of this SoCG are relevant to the appeal.

Housing Land Supply

- 6.6 A separate Housing Land Supply Statement of Common Ground has been agreed between the parties. This matter is not duplicated in this statement, other than that the Council accepts that it cannot currently demonstrate five year housing land supply.

Principle of Development

- 6.7 The application is located outside of development limits, within the countryside and contrary to the spatial objectives of the development plan.
- 6.8 The proposal conflicts with CS Policy CP9, CP11 and MDD LP Policy CC02.
- 6.9 CS Policy CP11 in its application to development in the countryside states that development will not normally be permitted unless one of the exceptions stated is met. The appeal scheme does not meet any of these exceptions. The purposes of CS Policy CP11 are 1) to protect the separate identity of settlements and 2) to maintain the quality of environment. The supporting text to CS Policy CP11 highlights further at paragraph 4.57 that restricting development outside of development limits 3) helps ensure development is well located for facilities and services. It is agreed that the appeal scheme within the red line boundary (i.e. excluding the proposed highway works on Reading Road) would not conflict with purpose 1) above.

Local Plan Update (“LPU”) & Loddon Valley Garden Village (“LVGV”)

- 6.10 The LPU Part 1 Hearings have been completed, with Part 2 Hearings to be scheduled to be held in 2026.
- 6.11 The Site is not allocated for development in the LPU and would remain in the countryside.
- 6.12 The Appeal Scheme would conflict with the LPU spatial strategy.

6.13 Two planning applications that make up the majority of the proposed LVGV allocation have now been received and validated and are pending determination. These include:

- 252498 - Hall Farm Church Lane Arborfield Reading RG2 9HX - Hybrid planning application (part in full, part in outline) comprising outline application for: up to 2,800 residential units to include up to 100 custom and self-build plots; 2 primary schools (up to 3 forms of entry) to include early years provision and 1 secondary school (up to 12 forms of entry); one District Centre, to incorporate up to 11,000m² of Class E (Commercial, Business and Service, to include a food store of around 2,500m²), and Class F (Local Community and Learning); one Local Centre, to incorporate up to 2,400m² of Class E; a Sports Hub to include sports pitches and pavilion space; up to 4,250m² of further Class E, Class F, and sui generis development to include commercial, health care and public house; associated green infrastructure, landscaping, public open space, play areas, and ecological enhancement measures; 20 gypsy and traveller pitches; drainage and flood alleviation measures to include Sustainable Urban Drainage Systems (SUDS) and engineering measures within Loddon Valley for the River Loddon; associated highway / transport / supporting infrastructure including spine road, pedestrian and cycle connections; associated utilities, infrastructure, and engineering works, including the undergrounding of overhead lines and an electricity substation; up to 0.5ha of land adjoining St Bartholomew's Church for use as cemetery. All matters reserved other than access, incorporating: access to highways, incorporating: a new pedestrian, cycle and vehicular access to Lower Earley Way via a new 4th arm to the Meldreth Way roundabout; a new pedestrian, cycle and vehicular bridge over the M4; a new pedestrian, cycle and vehicular bridge over the River Loddon; a new vehicular access to the A327

Reading Road, via a new arm to the Observer Way roundabout; a new pedestrian, cycle and vehicular access to Thames Valley Science Park; Phase 1 of internal roads including pedestrian / cycle routes, associated infrastructure, drainage and landscaping. Application includes full permission for the delivery of proposed 40.4 hectares of Suitable Natural Greenspace (SANG), 18.35 hectares of SANG link, and provision of Biodiversity Net Gain measures, the demolition and clearance of buildings and structures at the Centre for Dairy Research (CEDAR) and at Hall Farm, the demolition of 3 existing dwellings, and the retention of specified buildings at Hall Farm as specified by the applications drawings.

- 252769 - Land North of Mole Road and Church Lane Newlands Farm RG2 9JD - Outline planning application with all matters reserved other than principal access from Mole Road, for up to 430 dwellings, associated infrastructure to include a connection through to the proposed Spine Road, ref. 252498, new pedestrian cycle link connecting Byway ARB03 Carters' Hill Lane and Byway ARB08 Ellis's Hill, associated landscaping to include formal and informal public open space, biodiversity enhancements and associated utilities, infrastructure, and engineering works.

Best and Most Versatile Agricultural Land

- 6.14 The appeal scheme would result in a loss of 0.7 Grade 3a Best and Most Versatile Agricultural Land.

Heritage

- 6.15 The Site is not within any Conservation Areas and there are no Listed Buildings on the Site itself. There are two Grade II Listed Buildings in the

vicinity of the site: The Old Rectory and St Bartholomew's Church located approximately 100m and 285m from the site respectively. There are also non-designated heritage assets in proximity to the site. The proposal would not result in harmful impacts on these heritage assets or their setting.

Affordable Housing

- 6.16 The appeal scheme proposes to deliver 40% of dwellings on site as affordable housing units.
- 6.17 Subject to securing the affordable housing in a S106 agreement, the appeal scheme would comply with the CS Policy CP5 in terms of the proportion of affordable housing to be delivered on site.
- 6.18 All affordable housing units would be designed to meet the M4(2) standard of Building Regulations, with the exception of 5% of units which would be designed to meet the M4(3) standard of Building Regulations.
- 6.19 The parties are in the process of agreeing a Section 106 planning obligation to secure the affordable housing provision on site.

Open Space

- 6.20 The following table sets out the policy requirements for public open space typologies in respect of the maximum proposed quantum of 111 dwellings:

Open Space Typology	Standard (ha per 1,000 population)	Application Requirement (in ha)
Parks and public gardens	1.1	0.293
Amenity greenspace	0.98	0.261
Provision for children and young people (equipped)	0.25	0.067
Allotments	0.52	0.139
Natural/semi-natural greenspace	2.84	0.757
Outdoor sports facilities	1.66	0.442
Cemeteries (in plots)	14.4	3.836

- 6.21 The minimum size of a Local Equipped Area of Play is 600m² if delivered on-site.
- 6.22 The appeal scheme is seeking to deliver policy-compliant level of public open space in respect of the following typologies: amenity greenspace, provision for children and young people, natural/ semi-natural greenspace.
- 6.23 The following open space typologies are proposed to be delivered via off-site contribution: parks and public gardens, allotments, cemeteries and outdoor sports facilities.

- 6.24 The parties are working on producing a deed of planning obligations to secure the provision of Open Space and details relating to management and maintenance thereof.

Employment Skills

- 6.25 The Appeal Scheme is required to secure opportunities for training, apprenticeships and other vocational initiatives to develop local employability skills.
- 6.26 The parties are working on producing a deed of planning obligations to secure the Employment Skills Plan or Employment Skills Contribution in lieu.

Thames Basin Heaths Special Protection Area (“SPA”)

- 6.27 The Site is within the 400m-5km Zone of Influence for the SPA and, because the proposal would result in a net increase in dwellings, likely significant effects on the SPA via recreational disturbance cannot be ruled out. The project is screened in for Appropriate Assessment under the Conservation of Habitats and Species Regulations 2017 (as amended).
- 6.28 Permission can only be granted if the Appropriate Assessment is passed. The decision-maker, at the time of making the decision, needs to be certain that the proposal, including any package of secured mitigation measures, would not have adverse impacts on the SPA.
- 6.29 The Joint Strategic Partnership for the Thames Basin Heaths has developed a Delivery Framework of mitigation measures for recreational disturbance on the SPA. Natural England advises that decision makers

can be confident that proposals that secure mitigation in accordance with this Delivery Framework secure sufficient mitigation to pass Appropriate Assessment in respect of the risk of recreational disturbance.

- 6.30 The appeal scheme must demonstrate that adequate measures to avoid and mitigate any potential effects are delivered, in line with the CS Policy CP8 and retained Policy NRM6 of the South East Plan.
- 6.31 The Delivery Framework and policies mentioned set out two standards to mitigation recreational disturbance: the provision of Suitable Alternative Natural Greenspace ("SANG") and the provision of Strategic Access Management and Monitoring ("SAMM").
- 6.32 SANG capacity for the 400m-5km Zone of Influence is calculated on the basis of 8 hectares required per 1,000 population with occupancy rate assumed to be 2.4 persons per dwelling. Therefore, a development of 111 net dwellings in this zone needs to provide a minimum of 2.13 hectares of SANG to meet the Delivery Framework standard.
- 6.33 No SANG is proposed to be delivered on-site. This mitigation measure could be secured by allocation of available capacity in a strategic SANG which has a catchment that covers the Site.

Planning Balance

- 6.34 Benefits and harms are weighed by both parties in accordance with the following scales (weight increasing from the bottom up):

Benefits	Harms
Very substantial	Very substantial
Substantial	Substantial
Moderate	Moderate
Limited	Limited
Very Limited	Very Limited
Neutral	Neutral

6.35 Paragraph 11(d) of the NPPF applies to this appeal scheme. This states:

“(d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date⁸, granting permission unless:

(i) the application of policies in this Framework that protect areas or assets of particular importance⁷ provides a strong reason for refusing the development proposed; or

(ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.”

6.36 The ABNP was made more than five years ago. The ABNP does not alter the planning balance in the context of paragraph 14 of the NPPF.

7. MATTERS IN DISPUTE

- 7.1 Matters in dispute outlined below cover a broad range of issues, some of which are intended to be covered in the topic-specific SoCGs. Should the extent of matters in dispute change as a result of the production of topic-specific SoCGs, this SoCG will be updated. The following matters are currently in dispute between the parties:
- 7.2 The weight to be afforded to the Development Plan, the Emerging Local Plan and the policies which are most important for determining this appeal.
- 7.3 The weight to be afforded to benefits and harms of the Appeal Scheme.
- 7.4 Whether the Sequential Test is required to be undertaken by the Appellant. This issue is currently being reviewed following the submission of the updated Flood Risk Assessment and Drainage Strategy.
- 7.5 Whether the proposal would deliver policy-compliant affordable housing mix and tenure.
- 7.6 Whether it has been demonstrated that the Appeal Scheme would not result in adverse effects on integrity of the TBH SPA.
- 7.7 Whether Rooks Nest Wood SANG is available to mitigate the Appeal Scheme.
- 7.8 Whether it has been demonstrated that the Appeal Scheme would not result in loss or deterioration of irreplaceable habitats.

- 7.9 Whether it has been demonstrated that the Appeal Scheme would not result in adverse impacts on flood risk and/or watercourse.
- 7.10 Whether the LPU is at an advanced stage of the plan making process.
- 7.11 Whether it has been demonstrated that the Appeal Scheme would not prejudice the delivery of the LVGV.
- 7.12 Whether it has been demonstrated that the package of off-site s278 works would not result in adverse impacts on protected species.
- 7.13 The Baseline Habitat Value of the Site for the purposes of future BNG Assessment at Reserved Matters stage.
- 7.14 The position of trees within the Site and in close proximity to it, their respective value and condition.
- 7.15 The extent to which the development would have an adverse impact on the landscape and the surrounding area.
- 7.16 The Council reserves its position as to whether the appeal scheme as a whole (i.e. including the proposed highway works on Reading Road) would conflict with purpose 1) of CS Policy CP11 until such time as the Appellant has produced an updated LVIA which takes account of these works.
- 7.17 Whether the Site is within a sustainable location.

- 7.18 Whether opportunities for sustainable transport modes have been identified, pursued and exploited or maximised to make the location more sustainable.
- 7.19 Whether the tilted balance is engaged due to operation of Footnote 7 matters.
- 7.20 The policies which are most important for determining the appeal. Each party's position on those is set out in the table below:

Policy	Appellant's position	Council's position
CS Policy CP9 – Scale and Location of Development Proposals	✓	✓
CS Policy CP11 – Proposals Outside Development Limits	✓	✓
CS Policy CP17 – Housing Delivery	✓	✗
MDD LP Policy CC01 – Presumption in Favour of Sustainable Development	✓	✓
MDD LP Policy CC02 – Development Limits	✓	✓
ABNP Policy IRS1	✗	✓

8. CONDITIONS

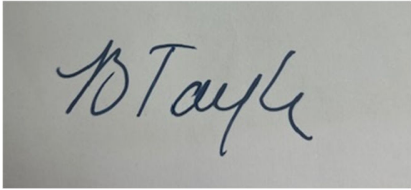
- 8.1 The schedule will be compiled and submitted to the Inspector prior to the Inquiry.

9. AGREEMENT: SCHEDULE OF COMMON GROUND

9.1 This document is accepted as the agreed Statement of Common Ground for the Appeal being considered under PINS Ref:
APP/X0360/W/25/3371069

9.2 It has been duly signed by representatives of the Appellant and Wokingham Borough Council.

Signed on behalf of the Appellant

Name:	Brigid Taylor on behalf of Dandara Southern Ltd & Elstree Land Ltd
Signature:	
Date:	23.01.2026
Position:	Associate Director, Woolf Bond Planning Ltd

Signed on behalf of Wokingham Borough Council

Name:	Joanna Carter on behalf of Wokingham Borough Council
Signature:	
Date:	23 rd January 2026
Position:	Principal Planning Officer
