

DELEGATED OFFICER REPORT



**WOKINGHAM
BOROUGH COUNCIL**

Application Number:	251458
Site Address:	Jardine Meadows, Croft Road, Shinfield, RG7 1YP
Expiry Date:	18 September 2025
Site Visit Date:	15 July 2025
Proposal: Full application for the proposed erection of 2no. detached 4-bedroom dwellings, access and associated landscaping.	

PLANNING CONSTRAINTS/STATUS

Affordable Housing Thresholds
 Modest Development Location – Spencers Wood
 Great Crested Newt Consultation Zone – Red Risk Zone
 Nuclear Consultation Zone – DEPZ
 Strategic Development Location – South of M4
 Tree Preservation Orders – TPO-1605-2017 & TPO-1968-2024
 Landscape Character Assessment Area
 Thames Basin Heaths SPA Mitigation Zones – 5km Linear Mitigation Zone

PLANNING POLICY

National Policy	National Planning Policy Framework (NPPF) National Planning Policy Guidance (NPPG)
Core Strategy (CS)	CP1 – Sustainable Development 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 CP17 – Housing Delivery
MDD Local Plan (MDD)	CC01 – Presumption in Favour of Sustainable Development CC02 – Development Limits CC03 – Green Infrastructure, Trees and Landscaping CC04 – Sustainable Design and Construction CC05 – Renewable Energy and Decentralised Energy Networks CC06 – Noise CC07 – Parking CC09 – Development and Flood Risk CC10 – Sustainable Drainage TB04 – Development in vicinity of Atomic Weapons Establishment (AWE), Burghfield TB05 – Housing Mix TB07 – Internal Space Standards TB08 – Open Space, Sport and Recreational Facilities Standards

	TB21 – Landscape Character TB23 – Biodiversity and Development
Wokingham Borough Local Plan Update (LPU)	SS1 – Sustainable development principles SS2 – Spatial strategy and settlement hierarchy SS3 – Development within or adjacent to major and modest settlements SS7 – Development in the vicinity of Atomic Weapons Establishments SS10 – Meeting our housing needs SS15 – Securing infrastructure SS16 – Safeguarded routes SS17 – Transport improvements CE1 – Design principles for efficient buildings CE3 – Environmental standards for residential development CE5 – Embodies carbon CE7 – Low carbon and renewable energy generation 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 H1 – Housing mix, density and standards H2 – Presumption against residential losses H3 – Affordable housing FD1 – Development and flood risk (from all sources) FD2 – Sustainable drainage 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 HC3 – Local Green Space HC4 – Open spaces, sports, recreation and play facilities HC5 – Environmental protection HC6 – Air pollution and air quality HC7 – Light pollution HC8 – Noise pollution HC9 – Contaminated land and water HC10 – Odor, fumes and dust
Other	Borough Design Guide Supplementary Planning Document CIL Guidance + 123 List Affordable Housing Supplementary Planning Document Sustainable Design and Construction Supplementary Planning Document Shinfield Neighbourhood Plan

PLANNING HISTORY

Application No.	Description	Decision & Date
181834	Full application for the proposed erection of 3no 4-bedroom dwellings with integral garages, new	Approved 12

	hard and soft landscaping, boundary treatments and other works.	November 2018
192124	Application for submission of details to comply with the following conditions of planning consent 181834 dated 12/11/2018. Conditions 3. External Materials. 5.Parking and Turning Space Details. 6.Cycle Parking Details. 7.Construction Method Statement. 8.Ground and Building Levels. 9.Detailed Lighting Scheme. 10. Biodiversity Enhancements. 11. Landscaping.	Approved 14 October 2019
233039	Full application for the proposed erection of 2 x 4 bed detached dwellings, access, and associated landscaping.	Refused 28 February 2024

CONSULTATION RESPONSES

Internal

WBC Drainage – No objection subject to condition(s)
WBC Highways – No objection subject to condition(s)
WBC Landscape and Trees - Objections
WBC Emergency Planning - Objections
WBC CIL – Development is CIL liable
WBC Ecology Newts – Request further information
WBC Ecology – Objections
WBC Waste Services – No comments received

External

Office for Nuclear Regulation – Objections
Thames Water Utilities Ltd – No comments received
West Berks Emergency Planning Officer – Objections
AWE Burghfield – Objections

REPRESENTATIONS

Parish/Town Council	Shinfield Parish Council objects to this planning application for the following reasons: 1. Impact on Protected Trees and Local Environment The proposed development site is entirely surrounded by trees and woodland protected under various Tree Preservation Orders (TPOs). The removal or damage of any trees would have a significant negative impact on the local environment and biodiversity. This area, particularly at the corner of Croft Road and Hyde End Lane, is a valued green space used extensively by walkers, cyclists, and horse riders. The loss of this verdant, open space would diminish the community's enjoyment and the character of the area.
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	2. Surface Water Flooding Risk The central area of the site, where the buildings are proposed, is identified as being at risk of surface water flooding. The applicant has not demonstrated how the development would mitigate this risk or prevent increased flooding on the site and surrounding areas, including adjacent roads. This is a critical concern that must be addressed with a detailed and robust drainage strategy. 3. Proximity to AWE Burghfield - DEPZ Concerns The site lies within the Detailed Emergency Planning Zone (DEPZ) of AWE Burghfield. While the applicant references the approval of the Hollies Nursing Home, it is important to note that the Inspector's Report for that case explicitly stated that the Off-Site Emergency Plan (OSEP) is not infinitely scalable. Incremental, unplanned development within the DEPZ could undermine the effective management of land use planning and pose a risk to public safety. Furthermore, the Hollies site was an allocated site, whereas this application is speculative and concerns previously undeveloped land. 4. Unsuitable Access Road. The current access road from the site to Croft Road is little more than a dirt track. The proposed development would significantly increase traffic, and the applicant has not provided adequate plans to upgrade the road surface. Without proper surfacing, there is a risk of mud and debris being transferred onto the main carriageway, creating hazards for other road users.
Ward Member(s)	No comments received
Neighbours	10 letters of objection listing the following concerns: 1. Applications previously refused for same development. 2. Loss of trees not mitigated adequately. 3. Impact on Great Crested Newts 4. Located within the DEPZ. 5. No bat survey completed. 6. Impact onto Biodiversity. 7. Harm to landscape via removal of further trees. 8. Loss of privacy (overlooking and loss of light) 9. Impact on shared driveway, not suitable to accommodate additional properties. 10. Impact on flood risk and drainage capacities 11. Wider highway safety impact on Croft Road 12. Impact on Thames Basin Heath SPA 13. No Affordable Housing provision

APPRAISAL

Site Description:

The site currently has limited tree coverage on the perimeter of the site. Until mid-2023, the site was covered in woodland, which was not TPO protected, but this was removed at some point in 2023, approximately around June/July. Part of this woodland; the northwest corner and west side to approximately the centre of the site; fell within the site boundary for application 181834, which granted permission for 3 new dwellings. A condition on this permission required that the trees on site be retained or replanted if removed within 5 years of substantial completion of the development. As such, the site should still have coverage of trees and woodland across the whole site and not just limited to the perimeter.

More recently, a further Tree Protection Order was placed across a large portion of the application site, protecting almost the entirety of the remaining trees on site (TPO-1968-2024).

The site sits to the east of the previously developed Jardine Meadows and sits on the corner of Croft Road and Hyde End Lane. The site has a semi-rural feel, despite being surrounded by new housing developments to the north, west and south of the site. The site was once within the designated countryside, but due to the recent developments, the site now sits within settlement in the Modest Development Location of Spencers Wood. However, the site sits on the boundary between settlement and countryside, with Hyde End Lane, which runs parallel to the site, being in the countryside.

The site is located within the AWE Detailed Emergency Planning Zone (DEPZ), within 5km of the Thames Basin Heath Special Protection Area (TBH SPA) and the site area is 0.155 hectares.

Proposal Description:

This application seeks approval for the proposed erection of 2no. detached 4-bedroom dwellinghouses plus associated access and landscaping.

This application follows a refusal for an almost identical development in February 2024 (application 233039). This application was refused by the LPA on the following grounds:

1. By virtue of the proposal requiring the removal of existing trees, most of which has already occurred and insufficient replanting and landscaping, the proposal would result in significant harm to the character of the surrounding landscape and would thereby fails to retain or enhance existing green infrastructure. As such, the proposal would be contrary to Policy CP3 of the Core Strategy, Policies CC03 and TB21 of the Managing Development Delivery Local Plan 2014 and the NPPF.
2. In the absence of sufficient ecological information, the proposal fails to demonstrate how it has taken into account the possibility of Great Crested Newts, a protected species, being on the site and how the impact on them could be mitigation. This is contrary to Section 15 of the NPPF, Paragraphs 98 and 99 of Circular 06/2005, Policies CP3 and CP7 of the Core Strategy and Policy TB23 of the Managing Development Delivery Local Plan 2014.

3. By virtue of the clearance of trees and vegetation on site, the proposal fails to demonstrate how it would not result in significant harm to biodiversity and no reasonable justification for the woodland loss nor adequate mitigation and compensation measures have been provided. As such, the proposal would be contrary to Policies CP3 and CP7 of the Core Strategy, Policy TB23 of the Managing Development Delivery Local Plan 2014 and the NPPF.
4. The proposal fails to demonstrate how the location of the proposed development can be safely accommodated having regard to the needs of Blue Light services and the Off-Site Emergency Plan (OSEP) for the Atomic Weapons Establishment Site at Burghfield. This is contrary to Policy TB04 of the Managing Development Delivery Local Plan 2014, policy CP3 of the Core Strategy and the NPPF.
5. In the absence of a planning obligation to secure suitable avoidance and mitigation measures and access management monitoring arrangements, in terms that are satisfactory to the Local Planning Authority (LPA), the LPA is unable to satisfy itself that the proposals include adequate mitigation measures to prevent the proposed development from having an adverse effect on the integrity of the Thames Basin Heaths SPA, in line with the requirements of Regulation 63 of the Conservation of Habitats and Species Regulations 2017 as amended and Article 6(3) of Directive 92/43/EEC. The proposal would be contrary to Policy NRM6 of the South-East Plan and Policies CP8 and CP4 of the Core Strategy.
6. In the absence of a planning obligation, the proposal does not demonstrate how it could facilitate the required level of affordable housing. This is contrary to Policy CP5 of the Core Strategy and Section 5 of the NPPF.

The only notable differences between the 233039 scheme and the current proposals are a minor re-siting of the plots to the south, plus tree planting is no longer proposed in the front garden of Plot 1.

Principle of Development:

Planning law requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise. In this case the development plans for the area are the Wokingham Borough Core Strategy 2010 and the Managing Development Delivery Local Plan 2014. At a national level, the National Planning Policy Framework (NPPF) constitutes guidance which the Local Planning Authority (LPA) must have regard to. The NPPF does not change the statutory status of the development plan as the starting point for decision making but is a material consideration in any subsequent determination.

Core Strategy 2010:

The site is located within settlement limits and as such the principle of development should be acceptable according to Policy CP9 providing that it complies with the principles stated in the Core Strategy. Policy CP3 of the Core Strategy states that development must be appropriate in terms of its scale of activity, mass, layout, built form, height, materials and character to the area in which it is located and must be of

high-quality design without detriment to the amenities of adjoining land uses and occupiers.

Managing Development Delivery Local Plan 2014 (MDDLDP):

Policy CC01 of the MDD Local Plan states that planning applications that accord with the policies in the Development Plan for Wokingham Borough will be approved without delay, unless material considerations indicate otherwise.

Local Plan Update (LPU):

The Council are also progressing with their Local Plan Update (LPU) which has progressed beyond the Proposed Submission Plan (Regulation 19) stage, with representations received on the plan's legal compliance and soundness between 30 September and 13 November 2024.

The Proposed Submission Plan (Regulation 19) consultation has now closed, and the Council have now analysed the representations received. The Regulation 22 plan was submitted to the Secretary of State for independent examination in February 2025, and two Planning Inspectors have been appointed to examine (EiP) the plan. The examination of the local plan is ongoing, and the council responded to initial questions and requests from the Inspectors in May 2025.

As seen in High Court judgements, even when an emerging plan is at an advanced stage, it may still attract limited weight if further consultation and modifications are required, and the Inspector has yet to issue a final report. Wokingham's LPU has several stages yet to be completed, including the examination hearings and main modifications stages, which restricts the weight that can currently be afforded to non-substantive.

The Council however acknowledge that there are unresolved objections on substantive grounds pursuant on the majority of relevant policies listed above, meaning weight attracted to these policies is limited.

National Planning Policy Framework (2024):

The latest published assessment of housing land supply concluded a deliverable supply of 2.5 years as of the 31st March 2025.

The National Planning Policy Framework (NPPF) states under paragraph 11 that where a local planning authority is unable to demonstrate a five-year supply of deliverable housing sites, the most important policies relating to the application may be viewed as being out of date. It continues to advise that unless there are specific policies in the NPPF protecting the land subject to the application, that permission should be granted unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the NPPF. This presumption in favour of sustainable development outlined in paragraph 11 of the NPPF is commonly referred to as the 'tilted balance' as harm and benefits are not weighed equally but tilted according to paragraph 11(d)ii).

Paragraph 11d(ii) requires the proposals to be considered against the policies of the NPPF taken as a whole and the three pillars of sustainable development. These will inform the planning balance exercise carried out at the end of this report.

Character of the Area:**Policy Context:**

Paragraph 124 of the NPPF states that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.

With regards to well-designed places, paragraph 135 of the NPPF states planning policies and decisions should ensure that developments:

- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);

Similarly, paragraph 130 states that development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes. This is supported by paragraph 129 of the NPPF too, which states:

“Area-based character assessments, design guides and codes and masterplans can be used to help ensure that land is used efficiently while also creating beautiful and sustainable places.”

The National Design Guide section B1, paragraph 67 also states that the built form of well-designed places should relate well to:

- the site, its context and the opportunities they present;
- the proposed identity and character for the development in the wider place;

Paragraph 68 follows on from this stating that houses and streets should establish an appropriate relationship with the pattern, sizes and proportions of existing houses in the local area.

Policy CP1(1) only supports development that maintains or enhances the high quality of the environment, with policy CP3 supporting development of an appropriate mass, layout, built form, height and character to the area CP3(a), and which makes a positive contribution to the sense of place contributes to the buildings and spaces.

Assessment:

Very little alterations have been made to the development proposals since the refusal of application 233039. Similarly, the site's appearance has not drastically changed since its determination.

The dwellings would be slightly staggered, with Plot 1 being slightly forward of 5 Jardine Meadows and Plot 2 being slightly forward of Plot 1. This stagger is seen in the existing building line, so the proposed dwellings would follow the building line that has been set by the existing dwellings along Jardine Meadows and would maintain the rhythm of built form that is seen in the area.

The proposed dwellings would be of a similar design to the other dwellings on Jardine Meadows. The existing dwellings are standard 'boxy' new build dwellings, with some gable features to the front elevations. The proposed dwellings would be of similar shape and would have pitched gables to the front elevation, with 'Jerkinhead' style roof for, which is seen in the other dwellings. The site context is mostly surrounded by new build developments, which means that the proposed dwellings would be viewed in the context of these developments. This means that the new dwellings would not appear out of place among these new build dwellings.

However, the site was previously covered by mature woodland, and this has since been cleared (please see Figure 1 below for a comparison). The site now just has limited coverage of trees around the perimeter of the site to the north, east and south of the site. The woodland and trees on site previously provided an important green buffer between the countryside and settlement and added to the semi-rural feel of the area. However, the removal of these trees has eroded this buffer and has created a more open and featureless space. The trees on site created screening for the existing dwellings and created that buffer. Whilst it is acknowledged that there would still be some trees on the eastern boundary, the trees on the south would be removed to provide the access for the proposed dwellings. This would therefore erode the buffer and the semi-rural nature of the site. As a result, this loss of trees and the proposed removal of more would result in significant harm to the character of the area.

Figure 1: Comparison of site from Aerial Images from 2022 and Site Visits on 11 January 2024 & 15 July 2025

Aerial Image from 27th February 2022 (Google Earth, 2024):



Application Site

Site Visit Photo taken 11th January 2024:



Site Visit Photo taken 15th July 2025:



Overall, the proposed design and plot layouts of the proposed dwellings would not result in harm to the character. However, the site location and the removal of a landscaping buffer provided by the trees that have been felled would result in harm to the character of the area and would present a conflict with policy CP3 of the Core Strategy and policy CC03 of the MDD Local Plan.

Amenity Space:

External:

The enlarged garden space resulting from the proposed change of use would provide sufficient outdoor garden space for the occupants of the dwelling. No objections are raised in this regard.

Internal:

Policy TB07 of the MDD and R17 of the SPD require adequate internal space to ensure the layout and size achieves good internal amenity.

The overall GIA, bedroom sizes and the cumulative living, kitchen and dining spaces all meet the minimum standards outlined in TB07 which is acceptable.

Neighbouring Amenity:

Policy CP3 of the Core Strategy aims to protect neighbouring amenity.

Overlooking:

R15 of the BDG requires the retention of reasonable levels of visual privacy to habitable rooms, with rear-to-rear separation of 22 metres and rear-to-flank separation of 12 metres, both at first floor level. R23 of the BDG notes that the side walls must not contain windows, especially at first floor level.

Both proposed dwellings would be at least 35 metres from the rear elevations of 72 and 74 Cobham Drive to the north of the site. Therefore, there would not be any significant overlooking to these dwellings to the rear. The proposed first floor rear windows of Plot 1 would look towards the garden of 5 Jardine Meadows, but this would mostly be towards the rear of the garden and not the frequently used patio area as the angle would be too oblique for overlooking to this part of the garden to occur.

Plot 1 would have a first-floor side window on the west side elevation. This window would serve a bedroom, which considered a habitable room would generate some degree of overlooking. There is first floor window on the side elevation of 5 Jardine Meadows which faces towards the southeast and would face the flank of Plot 1 and serves a bedroom. These windows would be approximately 3 metres apart. Whilst these windows would be near each other, it is not likely that there would be any direct overlooking as the angle between these two windows is oblique. Also, the window on 5 Jardine Meadows is behind the chimney breast, which would block the view from the window on the proposed dwelling of Plot 1. Therefore, it would be unlikely to result in any significant overlooking.

There has been concern raised by the neighbours at 5 Jardine Meadows that the ground floor side windows of Plot 1 would result in overlooking to the ground floor windows, which serve a lounge, on the east elevation of no. 5. The proposed dwellings would have a 1.8-metre-high boundary fence between each plot and the existing dwellings. This means that any ground floor windows would mostly be obscured by this fence. Therefore, there would not be any significant overlooking from these windows towards 5 Jardine Meadows.

Overbearing:

The BDG states that the ridge lines of new development should not be higher than other dwellings in the area. The proposed height of both proposed dwellings would be approximately 9 metres. The existing dwellings of Jardine Meadows are approximately 9 metres. Also, Plot 1 would be set approximately 1.5 metres from the boundary of 5 Jardine Meadows and both plots would be at least 30 metres from the dwellings to the rear. Therefore, the proposed dwellings would not be overbearing to the existing, neighbouring dwellings.

Loss of Light:

R18 of the Borough Design Guide SPD aims to protect sunlight and daylight to existing properties, with no material impact on levels of daylight in the habitable rooms of adjoining properties.

Habitable windows of adjoining properties must not be obstructed by a 25-degree angle and two storey extensions must not obstruct a 45-degree line back towards a habitable window of the adjoining property.

There are ground floor side windows on 5 Jardine Meadows, which may be impacted by the proposed dwellings. One of these windows serves a kitchen, which is not a habitable room, so loss of light would be limited. The other side window serves a living room, which is a habitable room. Plot 1 would fail the 25° rule in regard to this

window. However, this window is not the primary window for the living room, and 5 Jardine Meadows has a large window on the south elevation which would receive more daylight than this side window. Also, limited weight is afforded to side windows of habitable rooms as they would be obscured by any fencing which would block out any light. Plot 1 would not extend beyond the rear of 5 Jardine Meadows and would only marginally extend beyond the front elevation but would comply with the 45° rule.

The proposed dwellings would be far enough away from 72 and 74 Cobham Drive to the rear to not result in any significant overshadowing.

Overall, the proposed dwellings would not result in significant overshadowing to the neighbouring dwellings.

Highway Access and Parking Provision:

Parking (Vehicular and Cycle):

Based on the Borough's parking standards each dwelling would require 3 parking spaces.

Each dwelling would have an integral garage which is welcome. The internal dimensions are just short of the standards of 6m x 3m but are still considered acceptable to park certain cars.

Whilst no parking plan has been submitted, highways have assessed the landscaping plan and there is ample space on site to park the required number of cars.

Each plot would have a shed for cycle parking which is welcome, and each have direct access to it.

Access (Highway Safety):

The access to the proposed 2 dwellings would be from a private access road to which no objections are raised. It is unlikely that the traffic associated with 2no. additional dwellings would have a detrimental impact on vehicle movements and highway safety.

However, due to the site's location close to Croft Road which is a public highway, WBC Highways require a construction method statement. WBC Highways is content to secure this through a planning condition.

Landscape and Trees:

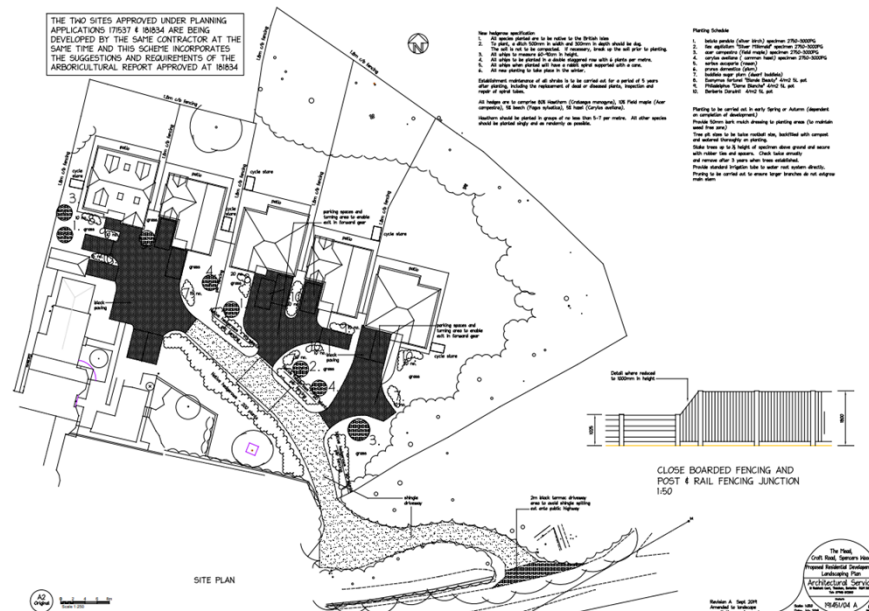
Policy CC03 of the MDD Local Plan aims to protect green infrastructure networks, promote linkages between public open space and the countryside, retain existing trees and establish appropriate landscaping and Policy TB21 requires consideration of the landscape character.

Site Context and History:

Following the permission for the adjacent houses in Jardine Meadows (181834), there has been significant removal of trees on site. The trees which would have been in the place of Plot 1, formed part of the site for application 181834. Condition 12 of this permission stated that all trees removed on site should be replaced within 5 years of substantial completion of the approved development. From aerial images, the

From a site visit made on 14th January 2024, the site has mostly been cleared of trees and vegetation except for trees on the north, east and southern boundaries of the site, so no replanting or replacement of these trees has occurred. As plot 1 would be within the site for 181834, any replanting to the level required would not be able to be facilitated as the dwelling would be in the way of this planting. Therefore, the proposal would result in a permanent breach of Condition 12 of the previous permission. It is acknowledged that this would be an enforcement issue, but if replanting is required from an enforcement investigation, then this would still need to be retained and replaced within 5 years and would still generate a conflict with this development.

Figure 2: Landscape Plan (ref. 191451/04 A) to discharge Condition 11 of 181834, approved under application 192124.



The WBC Landscape and Trees Officer has again raised objections to these proposals, summarised in the following paragraphs.

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End Lane where the two roads meet. This landscape buffer has also been retained on the adjacent new development north of the site and along Hyde End Road.

A TPO was served on the remaining trees within the site due to the unauthorised removal of trees that were previously shown as being retained in relation to the previous applications for dwellings in Jardine Meadows.

The current application requires the further removal of 11 trees, and two tree groups as identified in the Arboricultural Implications Report by SJA Trees and dated April 2025 in order to construct the two additional houses and to provide access and utility connections. This will further deplete the woodland copse to a thin line of trees to the east of the site. This incremental tree removal over time of trees within the 'woodland' of whatever category has had a detrimental effect on the character of this area, and further tree removals will have a significant detrimental impact on this important landscape feature that provides the semi-rural character to this part of Croft Road.

The removal of trees to create more usable rear gardens for the two new dwellings, will then allow increased visibility between the new housing development to the north and the proposed new dwellings, where currently there is some vegetative buffer between the two sites. I also note from the photos that due to earlier vegetation removal there is already a view out from the site into Hyde End Lane when looking east so therefore following more proposed tree removal and some proposed removal of understorey planting, there will be direct views into the site of the new dwellings as there will be insufficient trees left in the woodland belt to provide that screening function.

The Arboricultural Report includes in Appendix 4 indicative proposed tree replacement planting. The majority of this is proposed to the east of plot 2 outside the red line of the development site but within land owned by the applicant and will consist of whip planting of approximately 100 plants of approximately 1m high and six larger specimen trees. Six additional specimen trees of between 2.5m and 3.5m tall are proposed within the red line. No information is given as to who or how this will be maintained in the long term. Although this will help in part in the long term to thicken up what remains of the narrow tree belt this doesn't address the fact that this development will formalise and urbanise undeveloped land by the construction two proposed dwellings in an area that originally contained trees, nor will it mitigate for the loss of open land and the construction of two large detached dwellings closer to Croft Road / Hyde End Lane.

In considering the proposed development and its impact on important landscape features that contribute to the semi-rural character of the adjacent lanes and countryside beyond the settlement boundary, WBC Landscape and Trees object to the application. The proposals will be contrary to Core Strategy policy CP3 and Local Plan policies CC03 and TB21 as the proposed development cannot retain and protect existing landscape features that contribute to the character of the surrounding landscape plus there is insufficient space to accommodate a high-quality landscape scheme within the site boundary.

Ecology:

General:

WBC Ecology have reviewed the Ecological Appraisal Update and BNG Report (Calyx Environmental, Ref CDL25001, May 2025), Planning Statement and Arboricultural Implications Report. They have also reviewed the Statutory Metric CDL25001 V2 and the plans and drawings submitted in support of the application in addition to reviewing the site planning history and previous ecological and arboricultural assessments, photos, and mapping.

Habitats:

WBC Ecology consider that the applicant's Ecologist has failed to take account of the assessments and photos in the Preliminary Ecological Appraisal (The Ecology Group, Ref 2728) Arboricultural Assessment & Method Statement, Tree Protection Plan, Planning Design and Access Statement and Site Plan submitted in support of application 181834 and discharge of conditions 192124. The baseline assessment undertaken by Calyx Environmental has not adequately taken account of the comments made by WBC Ecology on application 233039 and as such, they are not satisfied that the baseline is accurate and has been assessed in line with the User Guide and regulations.

The EcIA update Sections 6 and 7 acknowledge that the site had recently been cleared in 2023 and is now closely mown grassland. I agree that the east of the site is not Ancient Semi Natural Woodland and can be classified as w1g Other Broadleaved Woodland. However, WBC Ecology do not agree that the woodland should be considered as single parcel and suggest that the habitat on west of the path is assessed separately. Only the Arboricultural implications report by SJA Trees Arboricultural Implications Report has been used by the Ecologist to assess the baseline condition and Arboricultural Assessment & Method Statement (Barrell Ref 18093-AA-CA, 18 June 2018) and Tree Protection Plan (Barrell Ref 18093-BT2) have not been used to evaluate the baseline.

According to the AIA & AMS 18093-AA-CA no trees were to be removed as a result of the 181834 permission. Low arboricultural quality trees T13 and groups G21 (Ash) and G25 (Cypress) were assessed as needing removal for management reasons. The Ecology Partnership advised that *"trees which are felled should be replanted with native species in a ratio of 3:1"*. They recommended that Cherry laurel and Portuguese laurel should be removed and replanted with native species.

The tree survey compensation planting and habitat management proposed should have been in the current baseline assessment. The tree protection scheme (Barrell Plan Ref 18093-BT2 and construction method statement secured have been breached, and materials were stored in the Construction Exclusion Zone of the TPO woodland. This evidence of degradation of grassland and habitat since January 2020 has not been assessed. Planting of the native hedgerow, Field maple and the grassland creation in Plot approved under 181834 Conditions 10, 11 and 12 and other compensation planting have not been implemented as approved, degradation caused by AMS and Construction Management Plan breaches, and failure to compensation and implement landscape management proposals should have been taken into account by Calyx Environmental.

Based on the information provided in the Ecological Appraisal Update and the Ecologist's failure to consider previous surveys, WBC Ecology disagree with

Ecological Appraisal Update paragraph 7.5 that the condition of the onsite habitat should be classified as poor. The Ecologist states *"Under BNG rules for assessing the prior condition of lost or degraded habitats, the pre-development biodiversity value must be taken to be the highest biodiversity value of the habitat which is reasonably supported by any available evidence relating to it"*.

In line with the Metric User Guide a precautionary approach should have been taken Calyx Environmental and in the absence of contrary evidence a higher condition score must be assigned to the woodland and grassland. While the Berkshire Local Nature Recovery Strategy for Berkshire will not be adopted until October 2025, WBC Ecology disagree that there is no guidance on strategic significance. WBC SPD, design guide, local and national Biodiversity Action Plans, as well as the Tree Preservation Order TPO-1968-2024 should have been taken into account, and the woodland assessed as either 'ecologically desirable' or 'Formally identified in local strategy'. The woodland habitat should therefore be assessed of High strategic significance in the BNG metric.

Lowland mixed deciduous woodland which is a habitat of principal importance and is contrary to local plan policies CP3, CP7 and TB23. The location of this woodland block is particularly important as it forms part of the remaining wildlife corridors for the wider Strategic Development Location. As such, it would also be contrary to local plan policies CP3 and TB23. The proposal does not set out a reasonable justification for the woodland loss, nor does it propose adequate mitigation and compensation and enhancement.

For the above reasons, WBC Ecology do not agree with the condition assessment and baseline habitat value assessed and recommend that the current metric is not agreed to. They consider that loss of biodiversity habitat has been under recorded and the hierarchy has not been applied, therefore approval of the application would not be in accordance with the NPPF and local plan policy.

Protected and Notable Species:

WBC Ecology disagree with matters relating to the pre-clearance risk assessment, avoidance or mitigation measures in respect of protected species should be outside of the scope of the current ecological appraisal.

The Ecological Appraisal Update paragraph 6.8 states *"the main proposed development area is currently unsuitable for reptiles due lack of suitable cover within the area of mown grassland"*. The Ecologist states *"Based on assessment of likely habitat prior to clearance, which appears to be recent secondary woodland similar to the remaining belt, it is likely that much of the site would have been too shaded. Although presence of widespread species (e.g. slow-worm) around margins cannot be ruled out"*.

The cumulative impact on wildlife including birds, amphibians and particularly reptiles and bats have not been assessed or mitigation proposed. The Preliminary Ecological Appraisal recommended that the compost heap is hand-searched by an ecologist and advised *"It is also important that the site's grassland is maintained to a height of below 5cm to prevent suitable reptile habitat becoming established prior to development"*. According to the photos provided in 2023 and 2025 by Calyx

Environmental, it appears that the retained grassland has been deliberately degraded to reduced and prevent maintenance of reptile and amphibian populations.

WBC Ecology disagree that wildlife including notable and protected species previously likely to have been supported by the site which will be indirectly or directly affected by the proposals will not be impacted. While off site mitigation is recommended, contrary to Local Plan and NPPF policy, no on-site mitigation and limited enhancements for protected species are proposed. The Ecological Assessment Updates fails to propose planning obligations for adequate blue-line land compensation to secure maintenance and enhancement of wildlife populations, or to off-set for the removal of trees, damage to woodland and lack of appropriate management required by planning policy.

Planning Statement:

The very low biodiversity value described in paragraph 2.33 that results from degradation of the site since 30 January 2020 will not be adequately compensated or mitigated by the Ecologist's recommendations. WBC Ecology note that incorporation of bird nest and bat roost features within the new dwellings previously recommended by The Ecology Group was not secured in the ecological enhancements proposed in 192124. In addition, it is unlikely that the LPA could secure long-term retention of native hedges and fruit trees in private gardens. The recommendations made are not in accordance with policy, and therefore not sufficient or to mitigate negative impacts and compensate for the cumulative loss of notable species and biodiversity habitat.

The current application does not propose retention, compensation or enhancement or address the degradation of the site raised in WBC Ecology's response to application 233039. WBC Ecology agree that the previous ecological objections and failure to comply with the NPPF and local plan policy have been addressed.

Great Crested Newts:

The application site is located within a Red Risk Zone, indicating highly suitable habitat for great crested newts and a likelihood of presence. The application site is well connected to surrounding habitat by the woodland to the east and a wet ditch to the south. There is a nearby recent record of great crested newts to the southeast, indicative of a breeding population within the vicinity of the application site. There is a pond 35m north of the application site.

A similar previous application at this site (233039) was refused, in part for failing to provide sufficient information regarding impacts to great crested newts and how these will be avoided.

An appropriate suite of reasonable avoidance measures should be provided in order to sufficiently demonstrate that the proposed development will not negatively impact great crested newts and/or their habitat. This should include an assessment of the likely impacts in the absence of such measures.

An appropriate assessment of the likely impacts of the proposed development on great crested newts has not been provided. The proposed avoidance measures for great crested newts are insufficient. The complete avoidance measures are limited to:

“To mitigate the risk of great crested newts, other amphibians, or reptiles, being injured by development, it is recommended that the grassland within the proposed development area be kept shorter than 5cm. Prior to ground works, reptile exclusion fencing should be erected around the construction area and maintained until practical completion.”

“To avoid any animals becoming trapped or injured during construction, open trenches should be covered at night, or if this is not possible, scaffold planks should be placed in them to create ramps, enabling escape.”

For various reasons, use of reptile/amphibian exclusion fencing should be avoided unless necessary and appropriate. Such fencing is known to often create a sheltering habitat in the soil at the base of the fence which is attractive to amphibians. Great crested newts have been encountered sheltering in soil crevices at the base of exclusion fencing during fence removal, which risks injury to great crested newts and potentially constitutes destruction of a resting place (both criminal offences). Therefore, it is recommended that use of exclusion fencing is carried out under licence. Exclusion fencing can come into conflict with construction activities if improperly planned and managed. It can inhibit the movement of vehicles, personnel and equipment, which may lead to it being removed or tampered with. It can be easily damaged, potentially allowing great crested newts to enter the site. It therefore requires a high level of ecologist involvement to plan placement, oversee installation, inform site personnel, regularly inspect its integrity and carry out maintenance, then finally oversee removal.

Potential impacts on great crested newts during vegetation clearance have not been considered. The Arboricultural Implications Report shows understorey clearance will take place within the wooded area. Measures are necessary to avoid potential killing/injury/disturbance and damage/destruction of resting places during such works. It will also be necessary to remove all arisings to prevent creation of additional sheltering habitat within the site.

The ecological report submitted with application 233039 shows a pile of loose soil and vegetation within the site which could provide refuge for great crested newts. Tree stumps are evident which could provide shelter around the base/roots. These features have not been adequately reported on and avoidance measures should consider these and any other potential places of shelter.

Avoidance measures should include a ‘toolbox talk’ to inform site personnel of the potential presence of great crested newts, the legislation protecting them, how to identify them, avoidance measures, and what to do if one is found. It is essential that the written avoidance measures stipulate the procedure in case great crested newts are encountered during works.

As this application is being recommended for refusal on other grounds, the additional information requested above has not been acquired from the applicant. As such, the lack of such mitigation forms a reason for refusal.

Summary:

Overall, by virtue of the clearance of trees and vegetation on site, the proposal fails to

demonstrate how it would not result in significant harm to biodiversity and no reasonable justification for the woodland loss nor adequate mitigation and compensation measures have been provided. As such, the proposal would be contrary to Policies CP3 and CP7 of the Core Strategy, Policy TB23 of the Managing Development Delivery Local Plan 2014 and the NPPF.

Furthermore, in the absence of sufficient ecological information, the proposal fails to demonstrate how it has taken into account the possibility of Great Crested Newts, a protected species, being on the site and how the impact on them could be mitigated. This is contrary to Section 15 of the NPPF, Paragraphs 98 and 99 of Circular 06/2005, Policies CP3 and CP7 of the Core Strategy and Policy TB23 of the Managing Development Delivery Local Plan 2014

Thames Basin Heath Special Protection Area:

Policy CP8 of the Core Strategy states that where development is likely to have an effect on the Thames Basin Heaths Special Protection Area (TBH SPA), it is required to demonstrate that adequate measures to avoid and mitigate any potential adverse effects are delivered.

The subject application includes a net increase of 2no. dwellings on a site that is within 5km of the TBH SPA. Policy CP8 states that where there is a net increase in dwellings within 5km of the SPA, an Appropriate Assessment is required to be undertaken.

The TBH SPA is designed to mitigate the impacts of allocated development and windfall sites in accordance with the Council's Development Plan. The proposed development is contrary to the development plan as a whole and is not allocated for development, meaning alternative SPA mitigation would need to be sought.

Therefore, the Council would not facilitate SPA mitigation for this site as it would undermine the strategic objective of mitigating development set out in the development plan.

In the absence of a planning obligation to secure suitable avoidance and mitigation measures and access management monitoring arrangements, in terms that are satisfactory to the Local Planning Authority (LPA), the LPA is unable to satisfy itself that the proposals include adequate mitigation measures to prevent the proposed development from having an adverse effect on the integrity of the Thames Basin Heaths SPA, in line with the requirements of Regulation 63 of the Conservation of Habitats and Species Regulations 2017 and Article 6(3) of Directive 92/43/EEC. The proposal would be contrary to Policy NRM6 of the South East Plan, Policies CP8 and CP4 of the Core Strategy.

Flooding and Drainage:

Policy CC10 of the MDD Local Plan requires that any surface water arising from a proposed development is managed in a sustainable manner. The WBC Drainage officer has no objection to the proposal, subject to a condition. The Drainage officer notes that the surface water will be managed via a SuDS and foul water will drain via an existing foul sewer network. The condition they have recommended relates to a drainage system and that details of the drainage system should be provided. As the

application is recommended for refusal, this condition and details of the drainage system will not be required.

Affordable Housing:

Policy CP5 of the Core Strategy states that residential proposals on greenfield land within modest development limits that include either at least 5 dwellings (net) or covering a net site area of at least 0.16 hectares will provide a 40% affordable housing contribution.

It is acknowledged that CP5 has a lower threshold to the National Planning Policy Framework, which states:

“Provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer)” (Paragraph 65).

Regardless, the application site area is only 0.155ha, which falls just under the minimum threshold within CP5, and well below the NPPF's threshold. Therefore, an affordable housing contribution is not required, nor does it form a reason for refusal.

Detailed Emergency Planning Zone – AWE Burghfield:

The application site is situated within the Detailed Emergency Planning Zone (DEPZ) surrounding Burghfield Atomic Weapons Establishment (AWE). The proposed development will increase the residential population within the DEPZ.

The DEPZ and Off-Site Emergency Plan is in place to protect individuals living, working and visiting within this boundary, as legislated by REPPiR 2019. Any increase would have a detrimental impact on the Council, and partners' ability to implement the Off-Site Emergency Plan (OSEP). As such, the proposal would be contrary to the requirements of Policy TB04 of the MDD Local Plan and section 8 of the NPPF.

There are existing pressures on the OSEP which mean any increases in the number of individuals living, working and visiting the DEPZ need to adequately be mitigated against. Pressures include those identified by the Office for Nuclear Regulation following a multi-agency exercise held in 2023:

- Arrangements for monitoring for radioactive contamination on or in members of the public as a result of an emergency' (and associated decontamination), known as contamination monitoring.
- Arrangements relating evacuation holding areas for displaced persons awaiting contamination monitoring.
- Arrangements for managing the numbers and scale of displaced people, both those outside the DEPZ and unable to return home for any period of time and those inside the DEPZ who require evacuation; and
- Arrangements for managing those who self-evacuate, especially for ensuring they undergo appropriate contamination monitoring and decontamination.

Previously where developments have been proposed of this size and within this part

of the DEPZ, the Emergency Planning consultation response has been to not object. However, following more recent planning appeals, and concerns raised by response partners about the burden placed upon the Off-Site Emergency Plan from further development, this stance has changed.

This position is consistent with that detailed in the recent appeal decision: APP/H1705/W/23/3326959, where the arguments made by West Berkshire District Council, Basingstoke and Deane Borough Council, and the Office for Nuclear Regulations were upheld by the Planning Inspector. Whilst all applications should be considered on their own merits, there are fundamentals, which are applicable to this application, such as:

“Although such an increase would be comparatively small, it is recognised that the plan is not infinitely scaleable. An increase in population would increase the need for, and demand placed upon, emergency responders, reception centres, rest centres and radiation monitoring exacerbating the difficulties of delivery emergency care in a complex multi-agency emergency.”

“...the key purpose of the REPPIR to reduce exposure during a radiation emergency through the effective deployment of the OSEP.”

“The additional demand for emergency services, at the time of an incident, would exacerbate an Emergency Plan already under tension resulting in substantial threat to its delivery affecting the safety of the public. This conflict accords with the objectives of the Framework for planning decisions to promote public safety and take into account wider security and defence requirements by, among other matters, proportionate steps to increase resilience and ensure public safety and security.”

Even more recently, the Secretary of State dismissed an appeal for up to 148 dwellings at Land East of Hayes Drive, Three Mile Cross (APP/X0360/W/24/3354607, application reference: 233038) on 22nd September 2025, primarily on grounds arising from the site’s location within the DEPZ. The main concerns raised consisted of:

1. Unacceptable Risk to Public Safety and Wellbeing
2. Pressure on the Off-Site Emergency Plan (OSEP)
3. Threat to National Security and AWE(B) Operations
4. Conflict with Local Planning Policy (MDD Policy TB04)
5. Precedent for further development and the Cumulative Impact on public safety

The Radiological Impact Assessment refers to the Kingfisher Close appeal, which should not be used as supporting evidence. Representations were only made by the Council’s Emergency Planning Manager, so the inspector did not have the objections and detailed arguments from other critical agencies from the Off-Site Planning Group before them – including West Berkshire Council, the Office for Nuclear Regulation and the Atomic Weapons Establishment, alongside the Ministry of Defence. For example, there was a lack of scrutiny and rebuttal of radiological evidence brought forward– in contrary to what has been provided by the UKHSA, at more recent appeals. Additionally, an inconsistent approach was taken; contrary to other prior appeals where similar evidence was provided by both parties in relation to the DEPZ,

and the decision was to uphold the refusal of planning permission. As well, as a different weighting being provided in respect to the importance of the impact of new residential accommodation within the DEPZ.

The Inspector also made clear in their report that:

“Given its bespoke circumstances, I do not consider that it would result in the creation of a precedent for allowing other development in the DEPZ that in any case must be assessed on its own merit” (para. 21).

Therefore, it is clear that this decision does not set a precedent for this appeal, or for any future applications within the Detailed Emergency Planning Zone.

There are further recent appeals, all with increases in population than this proposed that have been refused by Inspectors. For example:

- 25 Heath End Road Appeal (Appeal Ref: APP/H1705/W/24/3345746)
- Benham’s Farm Appeal (Appeal Ref: APP/W0340/W/24/3342596)
- Land approximately 150 metres south of Brimpton Lane and west off Blacknest Lane, Brimpton Common (Appeal Ref: APP/W0340/W/24/3346878)
- Recreation Road Appeal, (APP/W0340/W/24/3344580)
- Sunnyside Village Stores Appeal (APP/W0340/W/24/3343072)

The Inspectors’ decisions highlighted several concerns, for example public safety and the cumulative and adverse impact developments, including small, can have on the DEPZ & OSEP.

The assessment also refers to APP/W0340/W/22/3312261 ‘the Hollies’ to evidence their case. However, they have omitted that the Inspector said the AWE and OSEP:

“...is not infinitely scalable and that incremental, unplanned development could, over time, erode the effective management of the land use planning consultation zones and be detrimental to public safety. In that sense, I agree with the Inspectors in the Shyshack Lane appeal, the Benham’s Farm appeal and the 132 Recreation Road appeal. However, such concerns do not arise in the present case due to the fact that the appeal site is the only remaining allocated site within the DEPZ. As such, the circumstances of this appeal are unlikely to be repeated elsewhere in the DEPZ.”

The Hollies was an allocated site prior to REPIR 19, and expansion of the DEPZ, this site is not. Concerns have been raised on previous applications and appeals about the supporting Radiological Assessments produced by Katmal Limited, by members of the Off-Site Planning Group.

It should be noted that objections have been received from the following on grounds of the proposed development’s location within the DEPZ, namely:

- WBC Emergency Planning Officer
- West Berkshire Emergency Planning Officer
- Office for Nuclear Regulation
- Atomic Weapons Establishment - Burghfield

Overall, the proposal fails to demonstrate how the location of the proposed development can be safely accommodated having regard to the needs of Blue Light services and the Off-Site Emergency Plan (OSEP) for the Atomic Weapons Establishment Site at Burghfield. This is contrary to Policy TB04 of the Managing Development Delivery Local Plan 2014, policy CP3 of the Core Strategy and the NPPF.

Planning Balance/Conclusion:

The statutory starting point for determination is the development plan.

Paragraph 11 of the NPPF states that where a local authority is unable to demonstrate a five-year supply of deliverable housing sites, the most important policies relating to the application may be viewed as being out of date. It continues to advise that unless there are specific policies in the NPPF protecting the land subject to the application, that permission should be granted unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the NPPF (tilted balance).

In considering the weight to be attached to the various benefits and adverse impacts of a proposed development under the NPPF and the development plan, any planning application must be considered in context.

Residential development in this location is considered acceptable in principle. Moderate weight is attached to this policy compliance.

On the contrary, the proposals would result in a development that, facilitated by the loss of substantial areas of woodland and impacts onto remaining vegetation, would erode the buffer and the semi-rural nature of the site. As a result, this loss of trees and the proposed removal of more would result in significant harm to the character of the area. The development also fails to protect or mitigate adequately against protected species, including the Thames Basin Heath Special Protection Area. Lastly, the applicant has not demonstrated that the development can be safely accommodated having regard to the needs of Blue Light services and the Off-Site Emergency Plan (OSEP) for the Atomic Weapons Establishment Site at Burghfield.

Substantial social and environmental weight is applied to the conflicts and harm raised above.

In returning to the three objectives of sustainable development, it is acknowledged that the site would perform a limited short term economic role as a result of the construction period, and via consumer spending and CIL liable payments. As the number of homes proposed is limited to two, the weight afforded to the provision is very limited; these are residual consequences of any housing development.

Socially, the development would contribute to the Borough's housing stock, but the fact only two homes are proposed limits the weight applied to its benefits in the planning balance.

Environmentally, the development could reasonably be expected to demonstrate a

degree of inherent sustainability through compliance with Council supported energy efficiency and Building Regulations standards. There would also be an ability to impose conditions securing biodiversity enhancements to the site, as well as new/additional landscaping. The weight applied to these benefits would be limited by the scale of the application site and outweighed by the aforementioned environmental harm.

In engaging the tilted balance, those adverse impacts (as set out in the foregoing) because of the proposed development are considered to significantly and demonstrably outweigh the limited benefits of this scheme when assessed against the framework as whole. This application is therefore recommended for refusal.

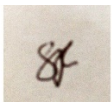
Community Infrastructure Levy (CIL):

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

The Public Sector Equality Duty (Equality Act 2010): In determining this application the Council is required to have due regard to its obligations under the Equality Act 2010. The key equalities protected characteristics include age, disability, gender, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief. There is no indication or evidence (including from consultation on the application) that persons with protected characteristics as identified by the Act have or will have different needs, experiences, issues and priorities in relation to this particular planning application and there would be no significant adverse impacts as a result of the development.

RECOMMENDATION

Conditions agreed:	Not required
Recommendation:	Refusal
Date:	2 October 2025
Earliest date for decision:	30 July 2025

Recommendation agreed by: (Authorised Officer)	
Date:	3.10.25

The Conservation of Habitats and Species Regulations 2017

Screening Assessment and Appropriate Assessment

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

Summary of Response

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

This site is located approximately **4.3 km** (measured from the access road to the application site) from the boundary of the SPA and therefore is likely to result in an adverse effect on the SPA, unless it is carried out together with appropriate avoidance and mitigation measures.

On commencement of the proposed development, a contribution (calculated on a per-bedroom basis) is to be paid to Wokingham Borough Council (WBC) towards the cost of measures to avoid and mitigate against the effect upon the Thames Basin Heaths SPA, as set out in WBC’s Infrastructure Delivery Contributions Supplementary Planning Document (SPD).

The strategy is for relevant developments to make financial contributions towards the provision of Suitable Alternative Natural Greenspaces (SANGs) in perpetuity as an alternative recreational location to the SPA and financial contributions towards Strategic Access Management and Monitoring (SAMM) measures.

The TBH SPA is designed to mitigate the impacts of allocated development and windfall sites in accordance with the Council's Development Plan. The proposed development is contrary to the development plan and not allocated for development, meaning alternative SPA mitigation would need to be sought.

Therefore, the Council would not facilitate SPA mitigation for this site as it would undermine the strategic objective of mitigating development set out in the development plan.

In the absence of a planning obligation to secure suitable avoidance and mitigation measures and access management monitoring arrangements, in terms that are satisfactory to the Local Planning Authority (LPA), the LPA is unable to satisfy itself that the proposals include adequate mitigation measures to prevent the proposed development from having an adverse effect on the integrity of the Thames Basin Heaths SPA, in line with the requirements of Regulation 63 of the Conservation of Habitats and Species Regulations 2017 and Article 6(3) of Directive 92/43/EEC. The proposal would be contrary to Policy NRM6 of the South East Plan, Policies CP8 and CP4 of the Core Strategy.

Date:	02/10/2025	Signed:	<i>Kieran Neumann</i>
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