



ET Planning

Planning Statement

Client:

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Barkham, RG41 1SH

S73 of application 240665 to change siting of approved dwelling and accompanying soft landscaping

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1. Introduction

- 1.1 This statement is produced to support a S73 planning application for the change in siting of approved application 240665: *"Full application for the proposed erection of 1 no. four bedroom detached dwelling with associated landscaping following demolition of the existing dwelling and garage"*. The Decision Notice and Officer Report of 240665 has been provided in **Appendix 1**.
- 1.2 The application seeks to vary conditions nos.2 and 8 of the approved application to revise the siting of the dwelling circa 5.5m further north than the approved position. Significant landscaping and ecological information have been provided to confirm the acceptability of this revision.
- 1.3 This planning statement will cover the background to the application and provide the necessary information to enable its determination by officers at the Council. It will consider the proposal in light of relevant planning policies and other material considerations. The conclusion reached is that key material considerations and the wider objectives of National and Local planning policy support the grant of permission.
- 1.4 In addition to this planning statement, the application is accompanied by the appropriate planning application forms and ownership certificate, duly signed and completed, and the following documents:

Existing Elevations and Floorplans (as per previous application 240665)

- 1:1250 Site Location Plan (640 PL 00 Rev. A)
- 1:500 Existing Site Block Plan (640 PL 01 Rev. A)
- 1:200 Existing Site Plan (640 PL 02)

- 1:100 Existing Ground Floor Plan (640 PL 03)
- 1:100 Existing Loft Plan (640 PL 04)
- 1:100 Existing South and West Elevations (640 PL 05)
- 1:100 Existing North and East Elevations (640 PL 06)

Plans Proposed as Part of Variation of Conditions S73 Application

- Proposed Site Block Plan (640 PL 07 Rev. D)
- Proposed Site Plan (640 PL 08 Rev. B)
- Proposed Ground Floor Plan (640 PL 09 Rev. B)
- Proposed First Floor Plan (640 PL 10 Rev. B)
- Proposed South and West Elevations (640 PL 11 Rev. C)
- Proposed North and East Elevations (640 PL 12 Rev. B)
- Proposed Site Elevations (640 PL 13 Rev. B)
- Proposed Landscaping Plan (640 PL 16)
- Design and Access Statement prepared by Artel31
- BNG Assessment provided by Ellendale Environmental (with Calculation tool)

1.5 The relevant application fee of will be submitted by the applicant separately.

2. Site Location and Description

- 2.1 The site currently comprises an existing semi-detached dwelling and outbuilding/garage which this application seeks to replace. One half of the semi-detached pair would be demolished with the remaining part being the Lawful Annex Dwelling which was granted a certificate of lawful use as an independent dwellinghouse (LPA Ref. 061138).
- 2.2 The area is characterised by extensive gardens, mature trees and woodland and there is a scattering of residential properties on the east of Bearwood Road, with the western side of the road comprising the grounds of Bearwood College and golf course, heavily screened from the road.
- 2.3 The site is not located within the Green Belt nor the AONB (Area of Outstanding Natural Beauty), however the site does have two area Tree Preservation Orders covering the northern part of the site (87/1978 and 20/1973).
- 2.4 The application site is within the 'Barkham Bearwood Valued Landscape' and the L1 'Bearwood and Gravel Hills' Landscape Character Assessment Area.

3. Planning History

- 3.1 **Application Ref. 061138** '*Application for a certificate of existing lawful use for the use of an existing annexe as a separate dwelling*' **Approved 25/07/2006.**
- 3.2 **Application Ref. 240665** '*Full application for the proposed erection of 1 no. four bedroom detached dwelling with associated landscaping*

*following demolition of the existing dwelling and garage'. **Approved 28/06/2024.***

4. Development Proposals

- 4.1 The proposal comprises a S73 application to vary condition no.2 of approved application 240665. Specifically, the proposal seeks to replace plan number "640-PL-07 C" with "640 PL 07 Rev. D". A landscaping plan has also been submitted to allow variation of condition no.8 (aligning with variation of condition no.2).
- 4.2 640 PL 07 Rev. D comprises a revised site plan providing a new siting circa 5.5m north of the approved position. This is the preferred position of the applicant as it reflects a siting more reflective of the original design and its relationship with the pond (this is still not as far north as the original submission - prior to any of the submitted amendments). This one of the locations of the dwelling prior to amendments being requested by the LPA in the previous submission.
- 4.3 Landscaping and Biodiversity Net Gain Plans have been provided and are also seeking to be secured in this Variation application. Condition 8 of the approved permission required further landscaping details to be provided. This condition should therefore be substituted to state development is to be provided in accordance with the submitted landscaping plan (640 PL 16).
- 4.4 The proposal is accompanied by BNG assessment of the proposed landscape and habitat creation which seeks to provide a benefit above that of the original permission. The applicant is prepared to enter into a BNG management plan which was not required by the original application to provide further enhancement as part of the proposal.

5. Policy Assessment

- 5.1 **Variation of Condition:** Section 73 of the Town and Country Planning Act 1990 (as amended) allows for the application for planning permission of development of land without complying with conditions subject to which a previous planning permission was granted.
- 5.2 Section 73(2) of the act states: "On such an application the local planning authority shall consider **only the question of the conditions** subject to which permission should be granted..." (emphasis added).
- 5.3 As such the principle of development or any other material considerations in relation to the original application are only to be considered in so far as their relevance to the condition(s) subject to this application.
- 5.4 It is reiterated Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the Development Plan, unless material considerations indicate otherwise. Where a proposal accords with the Development Plan permission should be granted.
- 5.5 In this instance the application seeks to vary conditions no.2 and 8 to allow for a change in the siting of the dwelling. The design of the dwelling remains the same and retains the same facilities and amenities as the approved application, therefore the following considerations are already acceptable:
- Principle of Development;
 - Character of the area;
 - Heritage;

- Neighbouring Amenity;
- Amenity;
- Highway Access and Parking Provision;
- Flooding and Drainage;
- Ecology.

5.6 It is acknowledged during the course of the previous application that the scheme was amended to its approved siting to address concerns raised regarding Landscape Impact and Trees. As such, this statement only seeks to address these considerations as the other considerations remain unchanged by the variation.

5.7 **Impact to Landscape Character / Tree Protection Order:** the previous application had required the dwelling to be sited to its original position to address landscape officer comments. These comments have been provided in Appendix 2.

5.8 Notably, these comments state that the site is within the ***Barkham and Bearwood Valued Landscape***. Whilst at the time of the original application this was undesignated, WBC have recently published their Regulation 19 Submission Plan ('LPU'). Whilst this can only be afforded **limited weight**, it provides relevant policies in **NE5: Landscape and Design** and **NE6: Valued Landscapes**.

5.9 It should be noted a 'Valued Landscape' as designated by a Local Plan is a local designation and as per paragraph 181 of the NPPF is to be distinguished as a "locally designated site". It does not attract any great protection from the Framework.

5.10 Draft policy NE5 advocates for a landscape-led approach and seeks for proposals to demonstrate an understanding of valued characteristics, features and quality of local landscape character

areas. It states a number of attributes that development proposes should have regard to and that Development Proposals affecting Valued Landscapes will only be supported where they are protected.

- 5.11 Notably, sub-paragraph 14.59 of the DLP states that it pertains to development proposals impacts affecting their **landscape and visual impact**. Sub-paragraph 14.60 continues development proposals within or otherwise affecting valued landscapes must carefully consider and **take account of the important landscape attributes and characteristics**. As such, it is emphasised it is the visual impact that largely comprises the assessment of impacts to Valued Landscapes.
- 5.12 The above is in accordance with Guidelines for Landscape and Visual Impact Assessment (GLVIA) and emphasises the fact that the assessment of landscape impact is in relation to viewpoints and identified characteristics. The previous comments in Appendix 2 provide no comment on these characteristics only stating there is unsubstantiated harm from increased built form and extension of built form into the countryside (there is no identification of the valued landscape attributes and characteristics nor the sites relationship with them making repeat reference to 'open countryside' and other harms regarding priority habitats and increased pollution).

Policy NE6: Valued landscapes

1. The following areas, as defined on the Policies Map, are designated as valued landscapes in recognition of their distinctive character to the borough's landscape.
 - Alexander Pope;
 - Bearwood and Barkham;
 - Billingbear;
 - Bowsey Hill;
 - Farley Hill;
 - Forest and Rides;
 - Haines Hill;
 - Remenham Chalk;
 - Ridge and Rivers;
 - Riseley Woods;
 - River Blackwater;
 - River Loddon;
 - River Thames.

2. Development proposals located within or affecting a valued landscape should have particular regard to the following attributes:
 - a) Landscape quality (condition);
 - b) Scenic quality;
 - c) Rarity;
 - d) Representativeness;
 - e) Conservation interests;
 - f) Recreation value;
 - g) Perceptual aspects; and
 - h) Associations.

3. Development proposals affecting Valued Landscapes will only be supported where they protect, and where appropriate, integrate with and/or enhance the special features, characteristics and qualities of the landscape, unless the benefits of the development in that location clearly outweigh the harm.

Figure.1 Draft Policy NE6 from WBC Regulation 19 Plan

- 5.13 Notably, paragraph 2.3.1 of the Landscape Institute's *Assessing Landscape Value Outside National Designations Technical Guidance Note* (02/21) states: "...the value of a landscape should be assessed as one of two components of landscape sensitivity. Landscape value is the 'inherent' component, which is independent of the development proposal, while the other component, susceptibility, is development specific".
- 5.14 It should be noted whilst NE6 is yet to be adopted the terms used in NE6.2 reference terms that have been superseded since the introduction of *Technical Guidance Note* (02/21) (TGN) these differences have been provided in table.1 below and can be found on pages 6 and 7 of the TGN (NE6.2 appears to reference previous guidance terminology).
- 5.15 Table 1. only seeks to provide clarity on terms used between NE6 and those used in the Landscape Institutes Technical Guidance Note (02/21) and how these criteria have been used to aid the assessment of this application as they may be used interchangeably (these are explicitly referenced in the TGN).
- 5.16 The Council's updated Valued Landscapes Assessment (September 2024) contains a detailed assessment of the Attributes of the Valued Landscape (Appendix 3). The following section seeks to summarise this assessment and identify how they apply to the application and neighbouring site independent of the proposal (the 'landscape value').

DLP NE6.2 Terms	TGN terms
Landscape quality (condition)	Landscape condition
Rarity	Distinctiveness
Representativeness	
Conservation Interests	Natural Heritage
	Cultural Heritage
-	Function

Table 1. Comparison of Terms used in assessment of Impact to Valued Landscapes as per NE6.2 and TGN (02/21)

- 5.17 **Landscape Value:** The Landscape Condition of the Valued Landscape (and its neighbouring sites) is considered to be strong and have a strong sense of place. The wider landscape is considered to be in good condition with the landscape strategy emphasising woodland and features associated with historic landscape.
- 5.18 In relation to Scenic Quality the site is not within any important views and vistas within the Arborfield and Barkham Neighbourhood Plan. The good condition of the landscape relates to the privacy and secrecy from the relative absence of intrusive infrastructure and dense woodland. This quality is emphasised by the 'Rhododendron Drive' **despite being at odds to enhance the woodland habitat of the Landscape.**
- 5.19 In relation to distinctiveness (rarity and representativeness) the 2024 assessment confirms that the "bulk" of the valued landscape pertains to the Registered Park and Gardens (to the west of the site), other rare features pertain to Ancient Woodland and elements of historic villages. There are no rare features of the valued landscape within the application site nor within the wider site. The assessment does however, notably highlight the "wooded context" and 'private' secluded area character – with woodland itself being considered a key feature of the landscape.
- 5.20 The narrative includes conservation interests, and notes deciduous woodlands being of value (being a priority habitat). Bearwood Park is a characteristic of cultural interest and is sited to the west of the application site. The application site being a private residence, unaffiliated with Bearwood Park, means the contribution the site makes to the landscape has no public recreational value.
- 5.21 The perceptual aspects of the valued landscape are related to its tranquillity and darks skies. However, it should be noted the

application site is at the eastern most point of the designation adjacent to the settlement boundary of Wokingham and is itself occupied by three dwellings and their respective families. For the same reasons the associations of figures associated within the landscape are not apparent to the site nor any adjoining parcels.

- 5.22 As emphasised in the sub-paragraphs of NE6 the exercise to identify valued landscapes will not identify localised areas, and therefore, in determining the Landscape Value the contribution of the site and adjoining sites and features need to be considered.
- 5.23 The Design and Access Statement prepared by Artel 31 contains a Landscape Appraisal of the site that demonstrates whilst the plot features trees and woodland, also features a number of man-made features (put in place prior to the TPOs) including an asphalt/hardcore vehicle path to allow for access to electricity services, a tarmac path and the evident asphalt driveway. Furthermore, the woodland within and adjacent to the plot is overrun with rhododendron.
- 5.24 In conjunction with the lawful residential use of the site, the value of the site cannot be high in relation to the valued landscape, as whilst woodland is present it features rhododendron and is amongst the residential setting of the dwellings on 178 Bearwood Road (and other historic hard structures).

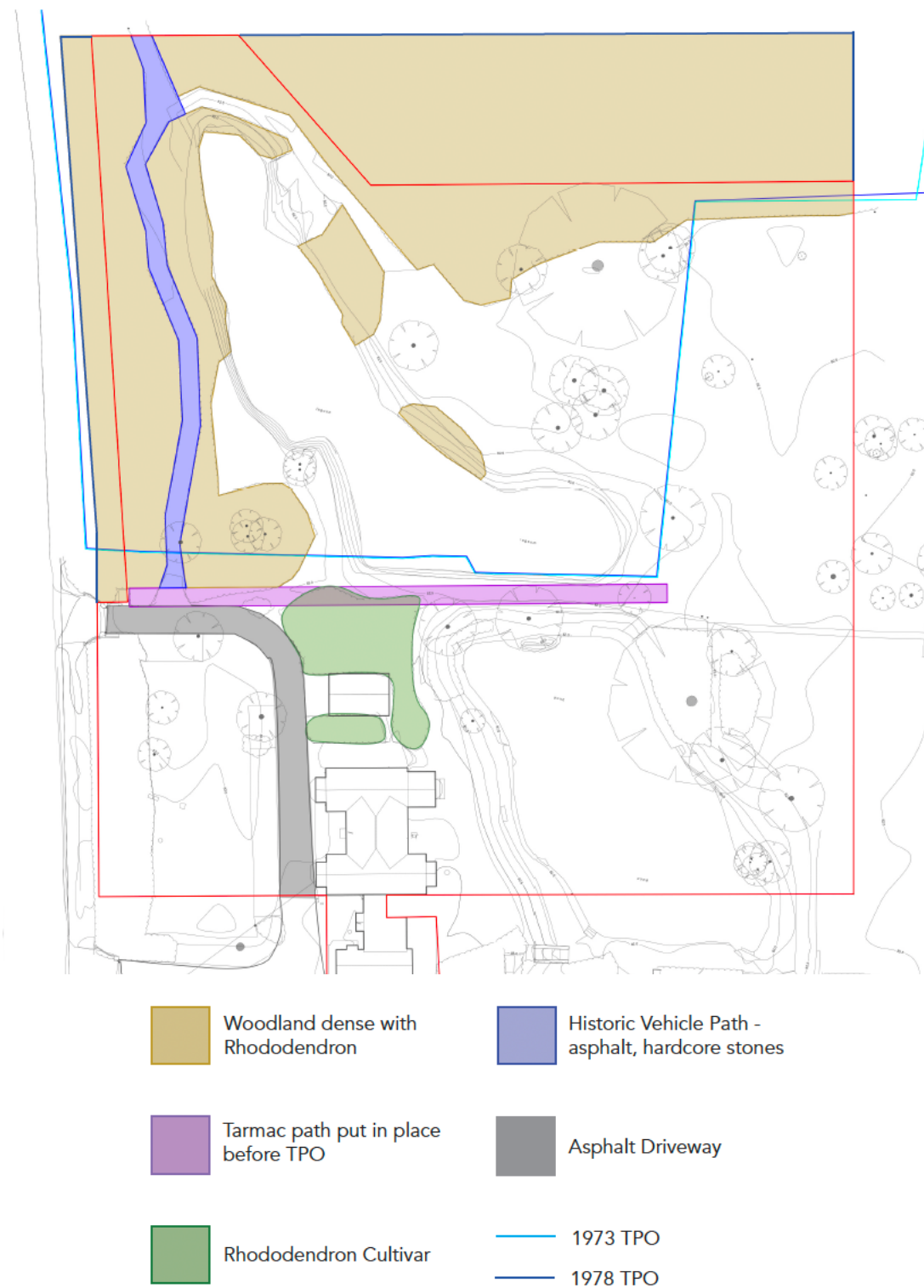


Figure 2. Extract of Design and Access Statement Prepared by Artel31 detailing Existing Garden Layout on site

- 5.25 **Susceptibility:** the proposed development would seek to provide a replacement dwelling within the site. It should be noted that the design of this dwelling has already been approved and the question the LPA needs to ask is if the new siting would fail to protect the characteristics of and ergo the valued landscape itself. How susceptible the site is within the valued landscape to change is relevant to this consideration. The design seeks to retain as many of the trees as possible only showing the removal of dead trees, the landscaping plan is clear that all trees are to be retained unless shown (but has accounted to retain all protected trees).
- 5.26 It is not disputed that woodland is present within the application site and this is one of the main characteristics of the valued landscape. However, the site is well contained owing to the vegetation along the site boundary, notably 'Rhododendron Drive' (or Rhododendron Avenue). It should be noted the application does not alter any of the boundary rhododendron and this element of the landscape is preserved and protected.
- 5.27 Similarly, the site has no public rights of way nor vantages which the site can be experienced from externally. Therefore, the development cannot be considered to result in any intrusion to the experience of the valued landscape from the main road – the only potential vantage point of the site.
- 5.28 Within the site itself the location of the dwelling would be sited closer to the TPO area however, it seeks to retain the trees protected by the TPO (the woodland) and only remove the rhododendron. It should be noted that the Council's Landscape Character Assessment identifies the following as a key issue within the Landscape Character Area:

*"Changes in deciduous woodland structure through loss of species diversity and **the spread of** sycamore, **rhododendron** and other*

*invasive/exotic species are **threatening the locally distinctive species composition of these woodlands**".*

- 5.29 The site features an abundance of rhododendron and therefore the site cannot be considered to be particularly susceptible in relation to within the valued landscape: already comprising a residential use, not being visible from any public viewpoints and featuring significant amounts rhododendron that overshadows the appearance and function of trees within the landscape.
- 5.30 **Summary and Scheme Benefits:** In short, the landscape value is largely attributed to other sites within the designation albeit the site cannot be entirely discounted owing to the presence of woodland. The adjoining parcels comprise other residential dwellings but also a significant amount of rhododendron obscuring the presence of the woodland. Therefore, the site area is not a high landscape value in itself (as it relates to the wider designation) – with the exception of Woodland to the east albeit this is not part of the application site nor affected by the proposal and maintains the transition between the landscape and the settlement.
- 5.31 Furthermore, the site has a low level of susceptibility owing to its screening and residential use which includes hard surfaces extending to the north of the site, similarly whilst woodland is present it is dominated by rhododendron which is antithetical to the valued landscape itself.
- 5.32 Development on the site would therefore not have any adverse harm to the valued landscape by way of protection of its characteristics and the lack of public visual receptors. Likewise, from private views of the neighbouring dwellings they would still be viewing the same dwelling in a similar siting, there would be no removal of characteristic woodland as a result of the proposal only removal of features that

detract – it is considered the wider site benefits proposed only enhance the valued landscape preserving its condition and distinctiveness.

- 5.33 The submitted landscaping plan confirms that whilst the development would be sited closer and within the TPO area only the rhododendron is to be removed. It is requested that the development is approved with pre-commencement conditions to provide tree protection measures and method statements to protect the trees that form the woodland (TPO) whilst allowing for the removal of the rhododendron. Should submitted details not be acceptable to the LPA then these can be refused, and such a condition would go to the heart of the permission (cannot be lawfully implemented without it).
- 5.34 This will only serve to not only protect but also enhance the valued landscape, particularly as the rhododendron removal would extend further north than the area the dwelling is to be sited ensuring the longevity of the trees on site. Similarly, the landscape plan would remove the tarmac path from the site further removing detrimental landscape features whilst further introducing native species where there were none before.
- 5.35 The removal of the rhododendron can be further secured by condition to ensure the landscape management practice remains in perpetuity or an appropriate amount of time (subject to reasonableness).
- 5.36 It is acknowledged the valued landscape noted priority habitats and to this extent a BNG assessment has also been provided demonstrating a **59.34%** increase in habitats as part of the landscaping proposal. The preliminary ecological information submitted with the original application remains and the landscaping plan is explicit it does not seek to remove any trees (all trees within TPO intended to be retained unless otherwise marked such as the

dead tree shown on the plan). As such, the natural interests of the valued landscape remain protected. Conditions akin to BNG management plan can also be applied to secure this gain.

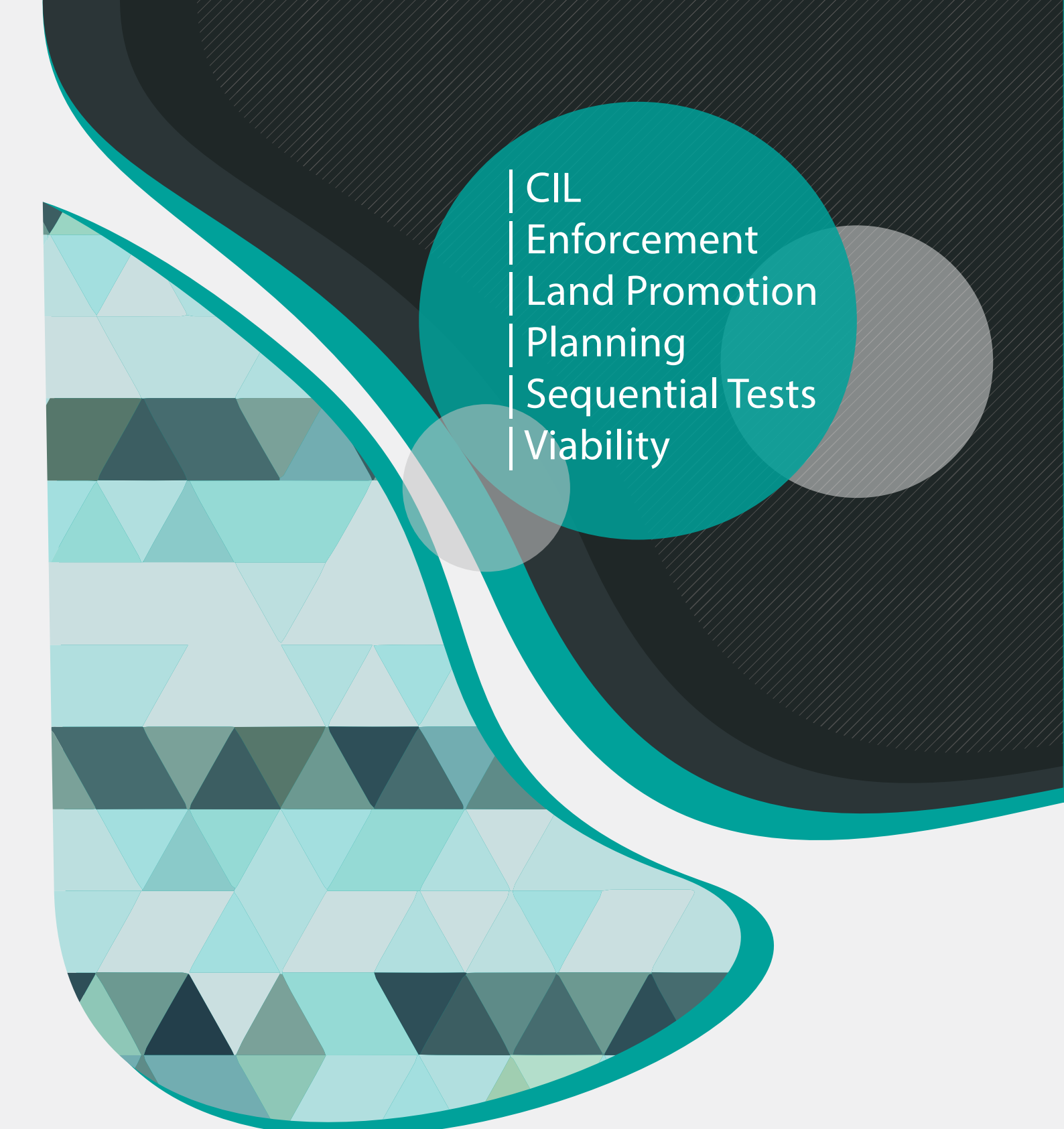
- 5.37 In short, the proposed variation would protect the existing valued landscape qualities that are present within and experienced from the site complying with relevant local plan policies and crucially draft policies that inform the landscape designation. In any case the site does not have a high landscape value in the context of the valued landscape as it exists and is not susceptible to development (already being a residential plot). The removal of rhododendron is a benefit that can be realised via the proposal as opposed to the approved permission, whilst tree conditions can be applied to protect woodland. As such, it is requested planning permission should be granted.

6. Conclusion

- 6.1 This statement has demonstrated that the proposed variation would have an acceptable landscape impact in the proposed position. This is when considered alone and without the proposed planting. The scheme goes further in actively securing the valued attributes of the valued landscape.
- 6.2 It is considered that the proposed scheme complies with relevant Development Plan Policies and is further supported by National Guidance. Therefore, it is respectfully requested that planning permission is granted to vary the requested conditions of the original application.



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