

MEMORANDUM

From:	Ben Davis Senior Planning Policy Officer		
Service	WBC Growth & Delivery (Planning Policy)	App No:	242421
Address:	School Road, Arborfield Cross.		
Proposal:	Outline application for the proposed redevelopment of the site and erection of up to 95 no. dwellings with associated access, infrastructure, open space, landscaping and associated works. (All matters reserved except for means of access).		
Type of Development:	Major Dwellings (10+)		
Site Visit Made:	Yes/No		

Summary Of Recommendations

- ☐ No comment
- ☐ No objection
- ☐ No objection subject to conditions (and reasons) **stated below**
- ☐ Request further information before determination as **stated below**
- ☐ Objection due to the reason(s) **stated below**

Comments On Proposal

Please use this section to detail any positive, satisfactory or negative aspects of the proposals relating to planning matters. Any additional information or negotiations required can also be detailed in this section.

The proposal relates to the redevelopment of the site and the erection of up to 95 dwellings with access and other infrastructure on land located to the north of School Road, Arborfield Cross.

The principle of development under the development plan

The application site comprises an area of greenfield land immediately adjoining the edge of, and outside, the development limits of Arborfield Cross, and is therefore designated countryside. Arborfield Cross is a Limited Development Location in the settlement hierarchy. To the north-east is a cluster of agricultural fields, lined with hedgerows and trees. To the west of the site is The Coombes Church of England Primary School. To the south is School Road and to the east is Wood Lane, a watercourse and a single dwelling and associated buildings.

Policy CP9 (Scale and location of development proposals) of the Core Strategy (2010) directs development to within development limits and states that *"the scale of*

development proposals in Wokingham borough must reflect the existing or proposed levels of facilities and services at or in the location, together with their accessibility."

Paragraph 4.52 of the Core Strategy states that Limited Development Locations "are those containing a basic range of services and facilities and are physically and socially cohesive. Within the development limits of these settlements, limited development would be acceptable. This includes affordable housing to meet identified local needs. The limits on the acceptable scale of development are based upon the dwelling completion information summarised in appendix 3".

The application site is located on the edge of the main built-up areas of Arborfield Cross, is distant from the Arborfield Green SDL, and is not located within development limits. The proposal is clearly contrary to Policy CP9 of the Core Strategy.

Policy CC02 (Development Limits) of the Managing Development Delivery (MDD) local plan (2014) supports development proposals on the edge of settlements, provided it can be demonstrated that the development is "*within development limits and respects the transition between the built-up area and the open countryside by taking account of the character of the adjacent countryside and landscape*". This policy reinforces that development plan policy seeks to guide development to locations within defined development limits.

Development proposals beyond development limits, in the designated countryside, should be assessed against Core Strategy Policy CP11 (Proposals outside Development Limits). Policy CP11 is therefore the most relevant policy for the assessment of this proposal and establishes that development proposals will not normally be permitted except where one or more of the specified exceptions apply. The proposal does not meet any of the specified exceptions and is therefore contrary to Policy CP11.

Turning to the overall aim of Policy CP11, this is to protect the separate identity of settlements and maintain the quality of the environment. As noted above, the application site adjoins the boundary of the development limit to the west and south and would result in the extension of the settlement. The application site is relatively distant from the main built-up area of Arborfield Cross village and would fail to achieve a satisfactory relationship to the existing settlement.

Arborfield and Barkham Neighbourhood Plan

The application site is located within the parish of Arborfield and Newland and therefore the Arborfield and Barkham Neighbourhood Plan 2019-2036 (2020) forms part of the development plan for the area.

Relevant policies from the Arborfield and Barkham Neighbourhood Plan that should be considered by the case officer include, but are not limited to, the following:

Policy IRS1: Preservation of separation of settlements:

The policy states:

In order to protect the separation of settlements, development proposals outside of development limits designated in the Managing Development Delivery Local Plan 2014 will be required to comply with Policy CP11 of the Core Strategy and:

- a) Preserve the character and appearance of the countryside; and*

b) Not lead to the physical, visual or perceived coalescence of existing settlements.

The policy relates to development within countryside areas and seeks to preserve the character and appearance of the countryside. The policy broadly mirrors Policy CP11 and introduces an emphasis on character and visual separation and perceived coalescence of existing settlements.

Policy IRS2: Recognise, respect and preserve identity and rural setting of settlements.

The policy reflects Core Strategy and MDD local plan policy in requiring the scale and density of development to respect the distinctive character and biodiversity of the area. A requirement of the policy is that development proposals respect and preserve any 'outstanding views' which are defined in paragraph 4.16 of the plan, as views that present 'an exceptional panorama of the landscape and including middle and distant features'. This is a high test that will not be applicable to most views.

It is noted that the development proposal encompasses two views (2.3 and 2.4) identified in 'Annex V Landscape and Important Views'. View 2.3 is of the fields to the south of School Road and View 2.4 is looking south from School Road towards Arborfield Green. Policy IRS2 also elevates consideration of the Village Design Statements for Arborfield and Barkham in the decision-making process, though these are already material considerations, and referenced in the supporting text to Policy CP1.

Policy AD2: Prioritising housing for local needs is also relevant. The policy requires residential development proposals to demonstrate how they will contribute to a balanced mix of housing types and tenures to meet the needs identified in the Arborfield and Barkham Housing Needs Analysis 2019 (or successor document). This broadly mirrors Policy CP5 and further suggests a need for starter homes and specialist homes for older people, which will need to be considered at the detailed design stage of a reserved matters application. Policy AD2 further specifies a preference that for-purchase affordable housing is prioritised for key workers with a local connection to the neighbourhood plan area in the first instance, and next to the wider borough.

The principle of development – emerging/consultative policy

The Local Plan Update (LPU) will supersede the adopted Core Strategy and MDD local plans.

The Proposed Submission Plan (Regulation 19) was published in October 2024 and representations are invited until Wednesday 13 November 2024. The LPU sets out the long-term development strategy for the borough to 2040, including proposed site allocations and planning policies.

The application site has been promoted for residential development (C3 Use only) (site ref: 5AR007) and was assessed in combination with two other parcels of land (site ref: 5AR009 and 5AR021) for their suitability for residential development through the plan-making process.

The Housing and Economic Land Availability Assessment (HELAA) (2024) exercise which is supporting evidence for plan-making assessed the land at a broad level, finding the sites 'unsuitable' (see assessment reference 5AR007 group), concluding:

"The context of the sites is considered unsuitable, being inappropriate in terms of established settlement form, landscape character and accessibility"

The application site was therefore not included as a development site in the Proposed Submission Plan. For clarity the site was also not proposed in any earlier consultation versions of the LPU.

The Proposed Submission Plan currently has limited weight in determining planning applications but does set out the council's approach to the long-term development of the borough. In addition, the assessment of land in the HELAA is high level with the purpose of informing options within plan-making. It is not comparable to a planning application.

Housing land supply position and the 'tilted balance'

The latest published assessment of housing land supply concluded a deliverable supply of 3.2 years at 31st March 2023.

The National Planning Policy Framework (NPPF) states under paragraph 11 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 as a whole. This presumption in favour of sustainable development outlined in paragraph 11 of the NPPF is commonly referred to as the 'tilted balance'.

It should be noted that the application of paragraph 11 of the NPPF does not change the statutory status of the development plan as the starting point for decision-making. This is clearly set out in paragraph 12 of the NPPF and is a matter of law.

Material to decisions on planning applications involving housing is the underlying reasons for the shortfall in deliverable housing sites. The shortfall is not as a result of non-delivery of housing but due to the significant over delivery in recent years reducing the bank of land with extant planning permissions.

All evidence and assessments show that whether the housing target is defined through the requirement set out in the Core Strategy or the outcome of the standard method set out in the Planning Practice Guidance, delivery has significantly exceeded the target. If over delivery were taken into account over the whole Core Strategy plan period or since the introduction of the standard method, there would be no shortfall over the coming five years, with over delivery significantly exceeding the shortfall.

In this context, the weight to be attached to policies within decision-making should remain significant and the benefits of additional housing under paragraph 11 of the NPPF should be tempered. This is consistent with the approach that numerous Inspectors have recently taken in applying moderate weight to the provision of additional housing:

- Willow Tree House (application ref 203560, appeal ref APP/X0360/W/21/3275086)
- Land at Baird Road (application ref 202303, appeal ref APP/X0360/W/21/3276169)
- Land to the west of St Anne's Drive and south of London Road (application ref 203544, appeal ref APP/X0360/W/22/3297645)
- Land east of Lodge Road (application ref 220458, appeal ref APP/X0360/W/22/3309202)
- Land off Watmore Lane / Maidensfield (application ref 230208, appeal ref APP/X0360/W/22/3309202)

Paragraph 77 of the NPPF makes clear that past over-supply can be accounted for in calculating the housing land supply position. The Planning Practice Guidance (PPG) has not been updated to clarify how to make this calculation. It is noted that the current government has consulted on changes to the NPPF which propose removing the ability to take account of past over-delivery. Notwithstanding, current national policy supports the position that the weight to be attached to the benefits of additional housing under paragraph 11 of the NPPF should be tempered in Wokingham Borough.

Paragraph 226 of the NPPF states that local planning authorities that meet the specific criteria will only be required to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of four years' worth of housing. The criteria have been met, and therefore the lower four year housing land supply applies.

Other considerations

The site comprises two agricultural fields. The western parts of the site fall within a provisional classification of Grade 3 agricultural land according to the national post 1998 land classification data. Grade 3 contains two sub-classes: Grade 3a which is Best and Most Versatile (BMV) and 3b which is not.

Core Strategy Policy CP1 states that planning permission will be granted for development proposals that, amongst other issues, "*Avoid areas of best and most versatile agricultural land*". Further, paragraph 180 b) of the NPPF states that planning policies and decisions should recognise the economic and other benefits of BMV agricultural land.

The application should be supported by an Agricultural Land Classification Study/Report that undertakes a site-specific investigation to categorise the land in greater detail. The report should also seek to demonstrate any previous agricultural activities that have occurred on the site, and whether the land could feasibly be cultivated for agricultural production.

Summary and conclusion

In summary, and to conclude, the application site is located on greenfield land within the countryside, on the edge of the development limits of Arborfield Cross.

The proposed development is contrary to Policy CP11 by virtue of it not meeting the defined exceptions supporting development in the countryside.

The application site adjoins the boundary of the development limit to the west and south and would lead to the extension of a Limited Development Location. The application site is relatively distant from the main built-up area of the village and would fail to achieve a satisfactory relationship to the existing settlement.

However, by virtue of the council's acknowledged housing land supply position, the presumption in favour of sustainable development set out in the NPPF at paragraph 11 is now engaged in the decision-making process. Accordingly, an assessment will need to be made on whether any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF framework taken as a whole.

The context of the housing land supply shortfall should be viewed within a bigger picture of over supply, acting to reduce the weight to be attached to the benefits of additional housing in the balance. Recent planning appeals have recognised the strong housing performance and the conflict with the development plan.

Other factors will need to be carefully considered following the receipt of advice from appropriate specialists.

Conditions & Reasons (if required)

Please use this section to detail any conditions that are required to make this development acceptable in planning terms. All conditions should be accompanied by reasons.

Date:	17/10/2024	Signed:	B.Davis
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