
Planning Statement

**Incorporating Affordable Housing Statement and
Statement of Community Involvement**

Land at Old Forest Road, Winnersh

Planning Statement

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- Appendix 1: Map showing distribution of community consultation leaflets
Appendix 2: Community consultation leaflet

1. Introduction

1.1. This Planning Statement has been prepared by Savills on behalf of Elstree Land, hereafter referred to as 'the Applicant', in support of a full planning application for residential development on land at Old Forest Road, Winnersh.

1.2. The description of the Proposed Development for which planning permission is sought is as follows:

"Erection of 53no. dwellings with associated landscaping, parking, drainage, open space and other associated works"

1.3. This application is submitted following pre-application discussions with Wokingham Borough Council ('WBC' or 'the Council'), ref: 243115. Further details of the Council's response are provided in Section 2 of this Planning Statement.

Overview of Development

1.4. The land at Old Forest Road, subject of this planning application, forms part of a site identified for residential development in the Local Plan Update; whilst this currently has very limited weight (as it not yet been Examined and found 'sound'), WBC are currently unable to demonstrate a 5 year supply of land for housing as required by national policy, and so this application has been brought forward to help address the deficiency. The proposals fall to be considered under the NPPF's 'tilted balance', whereby permission should be granted unless any harms associated with the development would significantly and demonstrably outweigh the benefits.

1.5. As set out in this Planning Statement, there are limited harms arising from the development (comprising only a minor degree of harm to a non-designated heritage asset, and a failure of the site to pass the sequential test – seeking to locate development in the lowest areas of flood risk). In contrast, the benefits of the scheme are many and weigh heavily in favour of granting permission; these include:

- 1) Erection of 53 homes, including 32 private market dwellings and 21 affordable dwellings, to help boost the supply of homes in Wokingham Borough, meet local needs and contribute towards the current shortfall in the 5 year housing land supply;
- 2) Provision of housing in a mix of sizes, types and tenures to meet local needs and provide choice in the local housing market;
- 3) Making effective use of land in a sustainable location, which is close to local services and facilities and has been identified as suitable for development in the emerging Local Plan Update (LPU);
- 4) Delivery of on-site play facilities to meet the needs of future residents;
- 5) Retention of existing mature trees on site, including all those protected by Tree Protection Order (TPO) TPO-0507-1989 and enhancement via long-term management, together with proposed new green infrastructure;

- 6) Provision of energy efficient new homes including a range of measures to reduce energy demand, improve energy efficiency and reduce carbon in line with building regulations in order to address the climate emergency and allow future residents to benefit from lower energy costs;
- 7) Securing of at least 10% biodiversity net gain in line with the requirements of the Environment Act;
- 8) Creation of jobs and investment during the construction phase, together with generation of investment in the locality and increase in spending in local shops; and
- 9) Increased Council Tax receipts and CIL contributions towards local infrastructure such as highways, education, and health.

The Planning Application Submission

- 1.6. This Planning Statement should be read in conjunction with various plans, drawings and documents submitted in support of the application which include:

- Completed Planning Application Form, including Ownership Certificates
- Covering Letter
- Site Location Plan
- Existing and Proposed Site Plans, Elevations, Floorplans, Roof plans and Street Scenes
- Design and Access Statement
- Biodiversity Net Gain Assessment and Metric
- Construction Environmental Management Plan
- Arboricultural Implications Assessment (including Tree Survey)
- Ecological Assessment
- Transport Statement
- Travel Plan
- Sustainability Statement
- Flood Risk Assessment and Drainage Statement
- Sequential Test
- Noise Impact Assessment
- Energy and Sustainability Assessment
- Built Heritage Statement
- Outdoor Lighting Report
- Lighting Strategy
- Geoenvironmental Report

Planning Statement Structure

- 1.7. This Planning Statement provides an overview of the site, planning application history, development proposals, planning policy provisions and other relevant planning considerations.

1.8. The Planning Statement is set out as follows:

- **Section 2** describes the site and its surroundings;
- **Section 3** summarises the scheme proposals;
- **Section 4** outlines the pre-application engagement which has taken place, including with WBC Planning Officers and the local community;
- **Section 5** considers the prevailing Development Plan context within which the planning application should be considered and identifies all other material considerations;
- **Section 6** assesses the principle of development against the Development Plan, having regard to other relevant material considerations;
- **Section 7** assesses other planning considerations relating to the proposed development based on the Development Plan and other relevant material considerations; and
- **Section 8** summarises the overall planning balance for the scheme proposals.

2. The Site and its Surroundings

- 2.1. The site extends to 1.6ha and lies adjacent to the built up area of Wokingham, to the south east, and beyond the site to the north is the North West Distributor Road (NWDR) associated with the North Wokingham Strategic Development Location, now known as Toutley Road.
- 2.2. The site comprises greenfield land screened on its southern, western and eastern boundaries by mature vegetation. There are no existing buildings or areas of hard landscaping on site. There are approximately 28 trees located within the site and around its perimeters which are protected by Tree Protection Order (TPO) (ref. TPO-0507-1989) as illustrated within the accompanying Arboricultural Survey.
- 2.3. Access to the site is taken off Old Forest Road through an existing route. Residential development is prevalent along either side of the access road, with a mixture of large detached properties directly south of the site along Old Forest Road and housing estates at Wayside to the east of the site and along Toutley Close beyond the southern boundary.
- 2.4. Old Forest Road Meadows SANG is located to the north of the site, beyond Toutley Road, and to the west.
- 2.5. The site is approximately 3.5km from Wokingham town centre, which provides a wide range of facilities including a Waitrose and Aldi supermarket, a number of smaller convenience stores, a variety of restaurants, public houses, cafes and places of worship. More locally, approximately 250m southeast of the site is a Co-Op supermarket and The Dog and Duck pub. Emmbrook Junior and Infant School are located 800m from the site as well as Emmbrook Sixth Form School which is approximately 1.2km away. Lowether Road playground and Emmbrook Sports & Social club are located off Old Forest Road, 280m from the site.
- 2.6. Wokingham train station, located c.2.5km from the site provides regular Great Western Railway and South Western Railway services to Reading, Gatwick Airport and London Waterloo. The station is also services a number of local bus routes.

Policy Designations

- 2.7. Under the adopted Development Plan (consisting of the Core Strategy 2010 and the Managing Development Deliver, or MDD, DPD 2014) the site is designated as open countryside where new development is generally restricted.
- 2.8. The site is located in a Great Crested Newt Impact Risk Red Zone, which identifies a highly suitable habitat for Great Crested Newts.

- 2.9. The site is identified within the Landscape Character Assessment 2019 and is located within the Landscape Character area of Wokingham-Winnersh Settled and Farmed Clay Land.
- 2.10. The site is not located within a Conservation Area and there are no listed buildings on or within the vicinity of the site, however the site is adjacent to Toutley Hall on Old Forest Road which is recognised as a Building of Traditional Local Character. The site is also within an Site of Special Scientific Interest (SSSI) Impact Risk Zone.
- 2.11. Under the adopted Development Plan (consisting of the Core Strategy 2010 and the Managing Development Deliver, or MDD, DPD 2014) the site is designated as open countryside where new development is generally restricted. However the site forms part of a wider area which is a draft allocation set out within Policy SS14.20 of the Local Plan Update: Proposed Submission Plan (LPUS). Policy SS14.20 allocates Land West of Old Forest Road for residential development and provides an approximate capacity of 50 dwellings for the 3.5ha site.

Planning History

- 2.12. There is no relevant planning history for residential development on the site.

3. Pre-Application and Community Engagement

Introduction

- 3.1. The NPPF encourages early pre-application engagement in order to “*improve the efficiency and effectiveness of the planning application system for all parties*” and to deliver “*improved outcomes for the community*” (paragraph 39). Similarly, WBC’s Statement of Community Involvement (SCI, adopted in March 2024) supports the involvement of communities at all stages of the planning process to ensure that proposals benefit from a greater focus on local needs and priorities from detailed local knowledge.
- 3.2. Accordingly, Elstree Land have undertaken pre-application engagement with both WBC and the local community to inform the proposed development, as summarised below.

Pre-Application Engagement with WBC

- 3.3. A request for pre-application advice specifically in respect of proposals for the application site was submitted in December 2024 and an initial meeting held with Officers in January 2025. The focus of the discussion at that stage was the layout and quantum of development. Subsequent meetings were held in February and March which were also informed by responses from technical consultees.
- 3.4. The pre-application submission included a covering letter and Site Layout Plan demonstrating how the site could accommodate 68 dwellings; and was accompanied by a suite of draft technical reports.

Initial Meeting

- 3.5. An initial meeting was held with WBC’s Planning Officers on 17 January 2025. Feedback focussed on the principle of development in the context of the Council’s acknowledged housing land supply shortage, as well as on key elements of the design/layout and the proposed housing mix (both private and affordable). Officers gave additional feedback after the meeting in relation to:
- Preference for more sporadic layout, variation in house typologies and gaps between dwellings
 - Preference to shift dwellings directly adjacent to the landscape buffer (towards Toutley Road)
 - Desire to avoid parking in front of houses (preference for parking to the side or in rear parking courts – with appropriate surveillance, landscaping etc)
 - Consideration of views of the apartment building on the eastern end from Toutley Road
 - Greater variation in house typologies was recommended
 - The location of the internal road, where it traverses the tree belt, was regarded as most suitable.

Follow-Up Meeting

- 3.6. A follow-up meeting was held on 13 February to discuss consultation responses with WBC Highways, Trees and Landscape and the Local Lead Flood Authority (LLFA).
- 3.7. The following feedback was received:
- WBC Highways advised that a safety audit would be required as well as tracking and sight lines particularly in terms of the central tree area
 - The avoidance of overhanging parking spaces was encouraged through a review of the location of spaces and opportunity for landscaping
 - The Officer confirmed the grain was revised positively in response previous comments and the reduction of unit numbers
 - The road layout was much improved and the re-location of car parking on site was welcomed
 - The orientation and siting of the eastern apartment block was improved as well as the typology in terms of the mix and variation of units
 - Raised concerns over the potential appearance of properties fronting Toutley Road
 - Units should meet back to back/garden depths to ensure there is no perception of overdevelopment
 - Agreed that larger apartments on either end of the site could be acceptable if a more sensitive design approach was taken
 - The Landscape Officer confirmed the site is in a low-quality landscape area
 - Advised to soften landscape edges including the northern landscape buffer
 - The Drainage Officer recommended consideration of the risk of surface water flooding at the central part of the site and confirmed Sequential Testing would be required.
- 3.8. Over the course of pre-application discussions with WBC, the number of dwellings reduced from 68 to 57. A final meeting was held on 11 March and written feedback was issued 11 April, assessing the 57 unit scheme.
- 3.9. Since this time, the number of units has been further reduced as one of the apartment blocks has been replaced with a row of terraced houses.

Community Engagement

- 3.10. Wokingham Borough Council's Statement of Community Involvement (SCI) was adopted in March 2024.
- 3.11. Local planning authorities (LPA) are required to produce an SCI under Part 2 (section 18) of the Planning and Compulsory Purchase Act 2004 (as amended). The Act defines a LPA's SCI as a statement of their policy for involving interested parties in matters relating to development in their area.

- 3.12. The SCI seeks to ensure effective community involvement at all stages in the land use planning process. It explains how those interested can be involved in the preparation of local plans, neighbourhood development plans, supplementary plans, and the consideration of planning applications. It also sets out what is expected from those proposing developments.
- 3.13. The Council expects Landowners and developers to engage early so that the views of residents and other stakeholders can be taken into account when assessing the detail of the proposal itself. The purpose of the engagement should be made clear and highlight that this is prior to any planning application being submitted to the Council.
- 3.14. It was considered that the most suitable way to reach all elements of the local community was to distribute an information leaflet via a letterbox drop, which took place in May 2025. The leaflet included information an overview of the proposed development and its community benefits. It also included instructions on how to respond by email, with views on the scheme proposals at that time.
- 3.15. The leaflet was distributed to 279 residents in the local vicinity of the Site. A distribution area map and certification of completion are included at Appendix 1.
- 3.16. A copy of the information leaflet is included at Appendix 2.

Key Findings

- 3.17. The consultation allowed for open ended feedback. The benefits of this approach enable stakeholders to return feedback on the proposed development without defined question parameters, thus capturing all commentary in full.
- 3.18. By the end of the consultation (15th May 2025), a total of 24 responses were received from local residents and the Emmbrook Residents Association.
- 3.19. The key comments were made as follows:
- Concerns about the sites relationship with the Northern Distribution Road (Toutley Road) running adjacent
 - Concerns regarding traffic increase and transport implications of the development
 - Queries regarding why access is proposed from Old Forest Road / not proposed from Toutley Road
 - Concerns for loss of habitat and wildlife on the site
 - Queries relating to access to surrounding open green spaces
 - Concerns about visual impact of new homes in this location and the precedent set for future potential development
 - Support for the intention to incorporate the provision of 40% affordable housing
 - Concerns regarding the proposal's compliance with the draft allocation set out in the LPU
 - Concerns over the strain the additional dwellings will have on local services

- Concerns for the lack of parking to accommodate proposed dwellings
- Loss of amenity and disturbance to local residents
- Concern over the centrally located apartment building
- Concerns over the proposed density
- Compromised green space and access to adjacent SANG.

3.20. In response to the matters raised, changes have been made to the proposed layout. This includes the removal of the centralised apartment block and replacement with 2 storey housing. This has also dropped the numbers from 55 units down to 53. The detail provided within this application will address many of the concerns raised. By far the most common concerns and queries were raised in respect of access and traffic impacts, which are addressed in the Transport Assessment which accompanies the application. It should be noted that the proposed access via Old Forest Road is the approach specified in the draft Local Plan Update allocation (Appendix E) – as discussed in greater detail in Sections 7 and 8 of this Statement.

4. The Proposed Development

- 4.1. The application is a full planning application for 53 dwellings, comprising a mix of sizes, types and tenures, together with areas of landscaping and drainage infrastructure. Vehicular access/egress will utilise the site's existing access from Old Forest Road.

- 4.2. The proposed description of development is as follows:

"Erection of 53no. dwellings with associated landscaping, parking, drainage, open space and other associated works"

- 4.3. The following section provides a summary of the key aspects of the proposed development. Further details are provided in the Design and Access Statement which accompanies the application.

Layout

- 4.4. The layout of the proposed development has been developed in response to pre-application discussions with the Local Authority.
- 4.5. Access is taken from Old Forest Road via an existing road, which also serves a limited number of existing residences. Broadly, the site is divided into an eastern and western parcel, by the central belt of trees which runs north-south. In the western parcel, a perimeter block structure is proposed with apartments at the western end providing a defined edge and an attractive woodland outlook for future residents. Along the northern edge, properties positively address Toutley Road via a landscaped buffer (which will be 'read' in conjunction with landscaped verge provided as part of the Toutley Road consent). Along the southern boundary of the western parcel, landscaped areas are proposed to protect the trees along this edge although a pedestrian connection is proposed in the form of a mown path.
- 4.6. Access to the smaller eastern parcel is gained via an existing break in the central tree belt. The internal access road then runs along the northern site boundary, again to enable the properties to front onto Toutley Road. At the north eastern end of the site, 'corner turning' houses are proposed so as to positively address Toutley Road as it curves in this location.
- 4.7. On both sides of the central tree belt, properties front onto the open space to provide active surveillance. A local area of play (LAP) is proposed within the central tree belt (to the south of the connecting road) to provide natural play opportunities for future residents.

- 4.8. The main vehicular access to the site takes the form of a simple priority junction with Old Forest Road varying in width between a maximum of 5.5m and a minimum of 4.8m as it leads into the residential development. A 2m wide footway would be provided along the north side of the access road, which would tie into the existing footway on Old Forest Road, to the east of the access. Shared surfaces will be provided within the site ranging in width between 5.5m and 4.8m.

Housing Mix

- 4.9. Full planning permission is sought for 53 no. dwellings including 21 no. affordable dwellings. Of the 53 no. dwellings, a range of 1-bedroom to 4-bedroom dwellings are proposed, including a mix of market and affordable dwellings.

- 4.10. The exact housing mix is set out below:

Size	Market	Affordable	Total Units	Total %
1 Bedroom Apartment	0	10	10	19%
2 Bedroom Apartment	6	6	12	23%
2 Bedroom House	5	0	5	9%
3 Bedroom house	9	5	14	26%
4 Bedroom House	12	0	12	23%
Total	32	21	53	100%

- 4.11. All the properties would meet the Nationally Described Space Standards (NDSS) and eleven of the properties (20% of those proposed) would be built to Building Regulations M4(2) standards.

Appearance

- 4.12. The accompanying Design and Access Statement sets out the approach to the appearance of the proposed development, including a variety of materials and design approaches. The proposals have been designed to respond to the distinctive character in Wokingham and the wider neighbourhood. The layout responds to the local character by providing a high standard of design and landscaping. The materials chosen to reflect the varied nature of the area.
- 4.13. A mixture of linear and informal building frontages proposed in response to Old Forest Road and the surrounding buildings. The built form has been arranged in an equivalent urban grain format to the wider neighbourhood. The compositions of buildings within each streetscape creates memorable, cohesive building groupings.

Scale

- 4.14. The majority of the proposed development would comprise 2 storey dwellings. The apartment blocks in the western part of the site would be 3 storeys in height and some 2.5 storey units are proposed to transition between these and the lower height houses elsewhere on the site. However, towards the centre of the site, some dwellings up to 2.5 storeys in height are proposed. Storey heights along the southern boundary, adjoining the existing built up area of Old Forest Road, are generally 2 storey in height.

Landscaping

- 4.15. The Proposed Development seeks to retain mature landscaping around the perimeter of the site and within the tree belt that crosses the site in a north/south direction. A range of new soft and hard landscaping would be provided throughout the site and existing landscaping enhanced where appropriate.
- 4.16. All the proposed dwellings would have access to some form of private amenity space, in the form of gardens for the houses and balconies and communal open space for the apartments.
- 4.17. New open spaces would be created to the north and south of the site, benefitting from a range of landscaping. The proposed LAP would serve residents of the proposed development and be focussed on securing play opportunities for children aged 6 and under. The LAP would have a focus on natural and imaginative play (such as log stepping stones, or boulders for climbing).

Access and parking

- 4.18. The proposed development would utilise the existing access point to the site, off Old Forest Road, for pedestrians, cyclists and vehicles. Potential further pedestrian / cycle connections to the land to the east and to the Old Forest Road Meadows SANG will be explored with WBC, with informal access arrangements being maintained up to the boundary edge.
- 4.19. Car Parking is provided on site at a standard of 2 spaces per 1-3 bedroom dwelling and 3 spaces per 4+ bedroom dwelling. These would be provided as a mix of allocated, unallocated and visitor spaces as set out in the table below:

Car Parking	Total
Spaces allocated to individual houses	59
Spaces allocated to apartment blocks	22
Unallocated spaces for use by residents	8
Unallocated spaces for use by visitors	11
Total	100

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- 4.20. In addition to the above, 11 garage parking spaces will be provided across the site.
- 4.21. All the proposed dwellings would have access to an Electric Vehicle Charging Point (EVCP).
- 4.22. Secure cycle parking is proposed to be provided at a ratio of 1 space per 1 and 2 bedroom dwelling, and 2 spaces per 3 and 4 bedroom dwelling. For the apartments these would be provided as shared communal cycle stores, while for the houses sheds / cycle stands would be provided in rear gardens.

5. Planning Policy Context

- 5.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 directs Local Planning Authorities to determine planning applications in accordance with the policies of the Development Plan unless material considerations indicate otherwise. Section 38(3) of the Act provides that the Development Plan includes the “*development plan documents (taken as a whole) which have been adopted or approved in relation to that area*”.
- 5.2. The adopted statutory Development Plan for Wokingham Borough Council comprises:
- Wokingham Borough Council Core Strategy (2010)
 - Managing Development Delivery (MDD) (2014)
- 5.3. Other key material considerations relevant to this planning application include national policy expressed through the National Planning Policy Framework (NPPF) (2024) and the Planning Practice Guidance, the Council’s emerging Local Plan Update and additional guidance provided by the Council’s Supplementary Planning Documents (SPDs) and position statements.

The Adopted Development Plan

Wokingham Borough Council Core Strategy (2010)

- 5.4. The Wokingham Borough Core Strategy was adopted in January 2010. The key Core Strategy policies relevant to this application are set out in Table 1 below.

Table 1

Policy	Title	Relevant Details
CP1	Sustainable Development	Development within the borough should enhance the overall sustainability of the area through minimising the impact on the environment.
CP2	Inclusive Communities	Planning permission will be granted for proposals that address the requirements of all sections of the population including an ageing population, children, young people and families, people with special needs and identified minority groups.
CP3	General Principles for Development	Planning permission will be granted for proposals that: a) Are of an appropriate scale of activity, mass, layout, built form, height, materials and character to the area together with a high quality of design without detriment to the amenities of adjoining land users including open spaces or occupiers and their quality of life; b) Provide a functional, accessible, safe, secure and adaptable scheme; c) Have no detrimental impact upon important ecological, heritage, landscape (including river valleys) or geological features or water courses.

		d) Maintain or enhance the ability of the site to support fauna and flora including protected species; e) Use the full potential of the site and contribute to the support for suitable complementary facilities and uses; f) Contribute to a sense of place in the buildings and spaces themselves and in the way they integrate with their surroundings (especially existing dwellings) including the use of appropriate landscaping; g) Provide for a framework of open space in secure community use achieving at least 4.65 ha/1,000 population provision together with recreational/sporting facilities in addition to private amenity space; h) Contribute towards the provision of an appropriate sustainable network of community facilities; i) Do not lead to a net loss of dwellings and other residential accommodation or land; and j) Do not lead to a loss of community or recreational facilities/land or infrastructure unless suitable alternative provision is available. This should be demonstrated through the submission of a Design and Access Statement and informative plans.
CP4	Infrastructure Requirements	The Council expect all new development to provide appropriate arrangements for the improvement or provision of infrastructure, services, community and other facilities.
CP5	Housing Mix, Density and Affordability	This policy makes clear that planning permission will be granted for residential development providing a mix and balance of densities, dwelling types, tenures and sizes. The Council require all residential proposals of at least 5 dwellings (net) or covering a net site area of at least 0.16 ha to provide up to 50% of the net additional units proposed as affordable dwellings, where viable. The Council will negotiate the tenure, size and type of affordable units on a site by site basis having regard to housing needs, site specifics and other factors. Subject to viability, the minimum percentages of affordable housing sought on "Any" land outside development locations is 40%.
CP6	Managing Travel Demand	The Council will seek to ensure that all proposals achieve sustainable development and that they are assessed for their impacts in generating travel demand. Assessments will be required to take account of the cumulative impact of proposals in the area. To facilitate achieving sustainable development, proposals likely to generate significant demands for travel movements should be located in areas with best access to existing good services.
CP7	Biodiversity	Development: A) Which may harm county designated sites (Local Wildlife Sites in Berkshire), whether directly or indirectly, or B) Which may harm habitats or, species of principle importance in England for nature conservation, veteran trees or features of the landscape that are of major importance for wild flora and fauna (including wildlife and river corridors), whether directly or indirectly, or

		C) That compromises the implementation of the national, regional, county and local biodiversity action plans will be only permitted if it has been clearly demonstrated that the need for the proposal outweighs the need to safeguard the nature conservation importance, that no alternative site that would result in less or no harm is available which will meet the need, and: i) Mitigation measures can be put in place to prevent damaging impacts; or ii) Appropriate compensation measures to offset the scale and kind of losses are provided.
CP9	Scale and Location of Development Proposals	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.
CP11	Proposals Outside Development Limits	In order to protect the separate identity of settlements and maintain the quality of the environment, proposals outside of development limits will not normally be permitted except where: 1) It contributes to diverse and sustainable rural enterprises within the borough, or in the case of other countryside based enterprises and activities, it contributes and/or promotes recreation in, and enjoyment of, the countryside; and 2) It does not lead to excessive encroachment or expansion of development away from the original buildings; and 3) It is contained within suitably located buildings which are appropriate for conversion, or in the case of replacement buildings would bring about environmental improvement; or 4) In the case of residential extensions, does not result in inappropriate increases in the scale, form or footprint of the original building; 5) In the case of replacement dwellings the proposal must: i) Bring about environmental improvements; or ii) Not result in inappropriate increases in the scale, form or footprint of the original building. 6) Essential community facilities cannot be accommodated within development limits or through the re-use/replacement of an existing building; 7) Affordable housing on rural exception sites in line with CP9.
CP17	Housing Delivery	The Council set out that provision will be made for development of at least 13,230 dwellings and associated development and infrastructure in the Borough in the period 2006-2026. From the period April 2021 to March 2026, an average of 623 dwellings per annum.

Wokingham Borough Council Managing Development Delivery (2014)

5.5. The Wokingham Borough Council Managing Development Delivery Plan Document (MDD) was adopted in 2014. The key policies from the MDD relevant to this application are set out in Table 2 below.

Table 2

Policy	Title	Relevant Details
CC01	Presumption in Favour of Sustainable Development	Outlines 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. It goes onto state that where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision, then the Council will grant permission unless material considerations indicate otherwise taking into account whether any adverse impacts of planning permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole or specific policies in the National Planning Policy Framework indicate that development should be restricted.
CC02	Development Limits	Planning permission for proposals at the edge of settlements will only be granted where they can demonstrate that the development, including boundary treatments, 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.
CC03	Green Infrastructure, Trees and Landscaping	Development proposals should demonstrate how they have considered and achieved the following criteria within scheme proposals: a) Provide new or protect and enhance the Borough's Green Infrastructure networks, including the need to mitigate potential impacts of new development b) Promote accessibility, linkages and permeability between and within existing green corridors including public rights of way such as footpaths, cycleways and bridleways c) Promote the integration of the scheme with any adjoining public open space or countryside d) Protect and retain existing trees, hedges and other landscape features e) Incorporate high quality, ideally, native planting and landscaping as an integral part of the scheme.
CC04	Sustainable Design and Construction	The Council will only grant planning permission for proposals that seek to deliver high quality sustainably design and constructed developments by: In respect of all new homes: a) Seeking to achieve the requirements of the full Code for Sustainable Homes Level 4; b) Meet internal potable water consumption targets of 105 litres or less per person per day (as part of the requirement to meet full Code for Sustainable Homes Level 4).

CC05	Renewable Energy and Decentralised Energy Networks	Planning permission will only be granted for proposals that deliver a minimum 10% reduction in carbon emissions through renewable energy or low carbon technology where the development is for (relevant to the proposals): a) Schemes of more than 10 dwellings (gross)
CC06	Noise	Proposals must demonstrate how they have addressed noise impacts to protect noise sensitive receptors (both existing and proposed) from noise impacts in line with Appendix 1 of the MDD.
CC07	Parking	Planning permission will only be granted where the proposal demonstrates the following: a) How the proposed parking provision meets the standards set out in Appendix 2 of the MDD b) That the new scheme retains an appropriate overall level of off-street parking.
CC09	Development and Flood Risk	Development proposals in Flood Zones 2 or 3 must take into account the vulnerability of proposed development. Development must be guided to areas of lowest flood risk by applying the sequential approach taking into account flooding from all sources and shall ensure flood risk is not worsened for the application site and elsewhere, and ideally that betterment of existing conditions is achieved. The sequential test will not be required if at least one of the following applies: a) Replacement of an existing single residential property. However, the replacement property should, where possible, be located on the part of the site at lowest risk b) Conversions and change of use unless it involves a change to a more vulnerable class c) Minor development, as defined in footnote 10 of the Technical Guidance Note to the NPPF.
CC10	Sustainable Drainage	All development proposals must ensure surface water arising from the proposed development including taking into account climate change is managed in a sustainable manner. This must be demonstrated through a) A Flood Risk Assessment, or b) Through a Surface Water Drainage Strategy.
TB05	Housing Mix	Proposals for residential development shall provide for an appropriate housing mix which reflects a balance between the underlying character of the area and both the current and projected needs of households. Any scheme that requires the provision of affordable housing should provide an appropriate mix of accommodation on a site by site basis, which reflects the Council's Housing Strategy and the Affordable Housing SPD. The policy goes on to state that a proportion of all dwellings must be built to Lifetime Homes Standards which will be determined on a site-by-site basis however normally within the range of 10-20%.

TB07	Internal Space Standards	Proposals for new residential units, including change of use or conversions, should ensure that the internal layout and size are suitable to serve the amenity requirements of future occupiers. The policy goes on to provide minimum size standards for new housing. However, these pre-date the introduction of the Nationally Described Space Standards (NDSS) which provides standards for new dwellings to ensure adequate residential amenity.	
TB08	Open Space, Sport and Recreational Facilities Standards	Proposals for residential development will need to demonstrate how they meet the standards set out below.	
		Type~	Standards (ha per 1,000 population)
		Parks and public gardens	1.1
		Natural/semi natural green space (excluding Country Parks*)	2.84
		Amenity greenspace	0.98
		Provision for children young people (Neighbourhood Equipped Areas of Play; Local Equipped Areas of Play; Local Areas of Play)	0.25
		Civic Space	0.01
		Outdoor sports facilities	1.66
		Cemeteries/Burial Grounds#	14.4 plots per 1,000 population
		Type (indoor sports)	Standards (sq m per 1,000 population)
		Sports halls (4-bad court) including indoor bowls (2 rinks) and Health & Fitness gym (20 stations)	65.43
		Swimming pool	8.26
		Activity halls	41.31
TB21	Landscape Character	1. Proposals must demonstrate how they have addressed the requirements of the Council's Landscape Character Assessment, including the landscape quality; landscape strategy; landscape sensitivity and key issues. 2. Proposals shall retain or enhance the condition, character and features that contribute to the landscape.	
TB23	Biodiversity and Development	Planning permission for development proposals will only be granted where they comply with policy CP7 – Biodiversity of the Core Strategy and also demonstrate how they: a) Provide opportunities, including through design, layout and landscaping to incorporate new biodiversity features or enhance existing	

		b) Provide appropriate buffer zones between development proposals and designated sites as well as habitats and species of principle importance for nature conservation c) Ensure that all existing and new developments are ecologically permeable through the protection of existing and the provision of new continuous wildlife corridors, which shall be integrated and linked to the wider green infrastructure network.
TB26	Buildings of Traditional Local Character and Areas of Special Character	Defines Buildings of Traditional Local Character as those which do not meet the standards for statutory listing but are nonetheless of importance to the Borough's heritage. The policy states that planning permission will only be granted for proposals to or affecting Buildings of Traditional Local Character and Areas of Special Character where they demonstrate that they retain and enhance the traditional, historical, local and special character of the building or area and its setting.

Other Material Considerations

National Planning Policy Framework (NPPF) (December 2024)

- 5.6. The (NPPF) was most recently updated in December 2024 and is a significant material consideration in the determination of planning applications. The overriding principle of the revised NPPF is to achieve sustainable development, which has three key dimensions: economic, social and environmental.
- 5.7. The following paragraphs are considered relevant to the proposed development.
- 5.8. Paragraph 7 of the NPPF states that, *'The purpose of the planning system is to contribute to the achievement of sustainable development.'* Paragraphs 8-10 state that there are three overarching objectives – economic, social and environmental – which are interdependent and should be pursued mutually 'in a positive way' in order to achieve sustainable development.
- 5.9. Paragraph 11 states that *'plans and decisions should apply a presumption in favour of sustainable development'*, which for decision-taking means:
- c) *Approving development proposals that accord with an up-to-date development plan without delay; or*
 - d) *Where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date⁸, granting permission unless:*
 - i. *The application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
 - ii. *Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination'.*

- 5.10. With regards to *where* ‘the policies which are most important for determining the application are out-of-date’ (paragraph 11d), footnote 8 states that ‘This includes, for applications involving the provision of housing, situations where the local planning authority cannot demonstrate a five year supply of deliverable housing sites (with the appropriate buffer, as set out in paragraph 78); or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years.’
- 5.11. Paragraph 34 states that policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years and then should be updated as necessary. It goes on to state that reviews should be completed no later than five years from the adoption date of a plan and should take into account changing circumstances affecting the area or any relevant changes in national policy.
- 5.12. Paragraph 61 addresses the support given to the Government’s objective of significantly boosting the supply of homes by stating that it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. The overall aim should be to meet an area’s identified housing need, including with an appropriate mix of housing types for the local community.
- 5.13. Paragraph 109 states transport issues should be considered from the earliest stages of plan-making and development proposals, using a vision-led approach to identify transport solutions that deliver well-designed, sustainable and popular places. This should involve:
- a) Making transport considerations an important part of early engagement with local communities;
 - b) Ensuring patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places;
 - c) Understanding and addressing the potential impacts of development on transport networks;
 - d) Realising opportunities from existing or proposed transport infrastructure, and changing transport technology and usage – for example in relation to the scale, location or density of development that can be accommodated;
 - e) Identifying and pursuing opportunities to promote walking, cycling and public transport use; and
 - f) Identifying, assessing and taking into account the environmental impacts of traffic and transport infrastructure – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains.
- 5.14. Paragraph 110 requires the planning system to actively manage patterns of growth in support of the above objectives set out in paragraph 109. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health.

However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.

- 5.15. Paragraph 116 states development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.
- 5.16. Paragraph 117 provides that, within this context, applications for development should:
- Give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;
 - Address the needs of people with disabilities and reduced mobility in relation to all modes of transport;
 - Create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;
 - Allow for the efficient delivery of goods, and access by service and emergency vehicles; and
 - Be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.
- 5.17. Paragraph 118 outlines all developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a vision-led transport statement or transport assessment so that the likely impacts of the proposal can be assessed and monitored.
- 5.18. Paragraph 129 states that planning policies and decisions should support development that makes efficient use of land, taking into account:
- a) *The identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;*
 - b) *Local market conditions and viability;*
 - c) *The availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;*
 - d) *The desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and*
 - e) *The importance of securing well-designed, attractive and healthy places.*

- 5.19. Paragraph 170 outlines that inappropriate development in areas at risk of flooding should be avoided by directing future development away from at highest risk. It goes onto confirm that where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.
- 5.20. Paragraph 172 makes clear that all plans should apply a sequential, risk-based approach to the location of development, taking into consideration all sources of flood risk and the current and future impacts of climate change so as to avoid where possible, flood risk to people and property.
- 5.21. The sequential test should be used in areas known to be at risk now or in the future from any form of flooding, except in situations where a site-specific flood risk assessment demonstrates that no built development within the site boundary, including access or escape routes, land raising or other potentially vulnerable elements, would be located on an area that would be at risk of flooding from any source, now and in the future (having regard to potential changes in flood risk) as outlined within paragraph 175.
- 5.22. Paragraph 180 outlines where planning applications come forward on sites allocated in the development plan through the sequential test, applicants need not apply the sequential test again. However, the exception test may need to be reapplied if relevant aspects of the proposal had not been considered when the test was applied at the plan-making stage, or if more recent information about existing or potential flood risk should be taken into account
- 5.23. Paragraph 196 states that planning policies and decisions should ensure that:
- a) a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination. This includes risks arising from natural hazards or former activities such as mining, and any proposals for mitigation including land remediation (as well as potential impacts on the natural environment arising from that remediation);
 - b) after remediation, as a minimum, land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990; and
 - c) adequate site investigation information, prepared by a competent person, is available to inform these assessments.
- 5.24. Paragraph 198 states planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:
- a) Mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life;

- b) Identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; and
- c) Limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.

- 5.25. Paragraph 200 states planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed.
- 5.26. Paragraph 207 makes clear that local planning authorities should require applicants to describe the significance of any heritage assets affected, including any contribution made by their setting. It goes on to outline that as a minimum, the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary.
- 5.27. Paragraph 216 states that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

The Wokingham Borough Design Guide

- 5.28. The Borough Design Guide SPD was adopted in June 2012 to encourage developers to bring forward well designed developments which complement and build upon the character of that immediate area.
- 5.29. The key objectives of the design guide are:
- *"To promote good design through the development process;*
 - *To create attractive, harmonious and well used places;*
 - *To ensure that all developments improve the character and quality of the area;*
 - *To encourage vibrant communities where people feel safe;*
 - *To create places that provide ease of movement and are accessible to all;*
 - *To respect and be sympathetic to the character of the area in which the development is situated;*
 - *To minimise overlooking, loss of privacy, loss of amenity or over-dominance;*
 - *To take full account of the mass and height of development in relation to adjacent development and surrounding spaces; and*
 - *To ensure that new development meets the needs of its users."*

Wokingham Borough Council Contaminated Land Strategy

- 5.30. The Contaminated Land Strategy for Wokingham was published in October 2015. The purpose of the survey is to review the Council's aims and objectives as well as the progress made in implementing its strategy so far.
- 5.31. The aim of the strategy is to set out in writing how the Council intends to implement its responsibilities under Part IIA, in accordance with statutory guidance.

The Wokingham Borough Council Local Plan Update

- 5.32. Wokingham Council are currently undertaking a Local Plan Update to cover the period up to 2040. The Proposed Submission Plan was submitted to the Secretary of State for examination by an independent Planning Inspector on 28 February 2025. Stage 1 of the examination is scheduled for the Summer of 2025, the Inspector's post-hearing letter is anticipated in Winter 2025, with the consultation on modifications planned for early 2026, and adoption is not projected until Spring/Summer 2026.
- 5.33. Through pre-application discussions with Wokingham Borough Council, Officers have indicated that they consider the Plan to have only limited weight given there are several stages of the Examination yet to be completed, including and the examination hearings and main modifications stage. They have therefore indicated that the application would not be assessed against the draft policies of the Plan and they are not considered in any further detail.
- 5.34. Notwithstanding this, it is relevant to note that the site lies within a wider area proposed to be allocated for residential development under Draft Policy SS14.20 to accommodate an approximate capacity of 50 dwellings. Criterion 2 of draft Policy SS14.20 requires that development proposals for each of the sites allocated under Policy SS14 take into consideration the site specific development guidelines set out in Appendix E. The reasoned justification to Policy SS14 (paragraph 5.116) notes that the number of dwellings listed for each draft allocation is indicative only, *"and does not represent a fixed requirement for each site. Those proposing development are encouraged to produce the most appropriate design-led solution, taking all relevant local and national policies, in arriving at a total dwelling figure for their site"*. Importantly, the reasoned justification goes on to state that *"The design-led approach should not be unnecessarily constrained by the indicative figure"*.
- 5.35. Appendix E of the LPU sets out the development guidelines specific to each site identified as a draft allocation. In terms of the draft allocation for land west of Old Forest Road (ref. SS14.20), the following development guidelines have been set out:
- *"Vehicular access preferred from Old Forest Road*
 - *Development should avoid the existing area of Old Forest Meadows SANG*
 - *Opportunities to provide pedestrian connectivity to adjacent areas of green space at Old Forest Road Meadows SANG and to the shared pedestrian / cycle path along the North Wokingham Distributor Road*

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- *Appropriate landscaping to contribute towards the character of North Wokingham Distributor Road as a green route*
- *That surface water corridors within the site are left free of development.*
- *Demonstrate that safe access and egress is achievable during surface water flood events for both residents and emergency vehicles.*
- *Undertake a heritage impact assessment”.*

6. Assessment of Principle of Development

Principle of Development

- 6.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 provides that all decisions must be determined in accordance with the Development Plan, when taken as a whole, unless other material considerations indicate otherwise. Section 5 of this Statement sets out the Development Plan and relevant material considerations which should be considered in the determination of the proposed development.
- 6.2. In this case, the Development Plan consists of the Core Strategy and the Management Development Delivery Plan Document (MDD), which should be read alongside the NPPF as a material consideration. The MDD Local Plan Policy CC01 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.
- 6.3. Of key importance is the NPPF and in particular the presumption in favour of sustainable development and the provisions of Paragraph 11 which explain how and when the presumption should operate in respect of decision-taking.
- 6.4. Paragraph 11 c) and d) are set out below:

*'For **decision-taking** this means:*

- a) *Approving development proposals that accord with an up-to-date development plan without delay; or*
- b) *Where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date⁸, granting permission unless:*
 - i. *The application of policies in this Framework that protect areas or assets of particular importance⁷ provides a strong reason for refusing the development proposed; or*
 - ii. *Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination⁹.*

Footnote 7- The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 194) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75); and areas at risk of flooding or coastal change

Footnote 8- This includes, for applications involving the provision of housing, situations where: the local planning authority cannot demonstrate a five year supply of deliverable housing sites (with the appropriate buffer as set out in paragraph 78); or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years. See also paragraph 232'

6.5. There are therefore three separate tests to decision-taking and the presumption as established by Paragraph 11d. This Statement first establishes:

1. Whether the presumption is engaged (test 1); and if so
2. Whether the impact of the proposed development on protected areas or assets provide a clear reason for refusal (test 2); and
3. finally, whether the adverse impacts would significantly and demonstrably outweigh the benefits (test 3).

6.6. Each of these 'tests' is considered in turn below.

First component of the Test: Whether the presumption in favour of sustainable development is engaged

6.7. The first component part of the test within Paragraph 11d considers whether the tilted balance is engaged. This involves consideration of whether there are any relevant development plan policies or which policies are most important and whether they are out of date.

6.8. As above, Paragraph 11d of the NPPF clarifies that '*...policies which are the most important for determining the application are out-of-date...*' includes (as per Footnote 8), '*for applications involving the provision of housing, situations where: the local planning authority cannot demonstrate a five year supply of deliverable housing sites (with the appropriate buffer as set out in paragraph 78); or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years*'.

Review of Local Plans

6.9. Paragraph 34 of the NPPF is clear that '*policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Reviews should be completed no later than five years from the adoption date of a plan, and should take into account changing circumstances affecting the area, or any relevant changes in national policy. Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future*'.

6.10. The Wokingham Council Core Strategy was adopted in 2010 whilst the Delivery DPD in was adopted in 2014. Both documents are therefore older than 5 years and again must be considered out of date in the terms of paragraph 11d.

Lack of 5 year housing land supply

- 6.11. Whilst the Housing Delivery Test measurement for Wokingham has not been below 75% (and is therefore not considered further), Wokingham Council has been unable to demonstrate a 5 year supply of deliverable housing sites with the appropriate buffer.
- 6.12. As noted above, the Council's most recent published full assessment of the housing land supply position is the 'WBC Five Year Housing Land Supply Statement at 31st March 2024' which indicates a shortfall in the housing land supply equating to a supply of only 1.7 years (based on the NPPF's latest calculation of local housing need). This position has subsequently been confirmed through more recent appeal decisions, including at Land North of the A4, Twyford¹ and at Blagrove Lane, Wokingham².
- 6.13. Given the unquestioned inability of Wokingham Council to demonstrate a five year supply of deliverable housing sites, the policies that are most important for determining the application within the Core Strategy are clearly out-of-date in the terms of paragraph 11d.

The most important policies

- 6.14. Policies CP9, CP11 and CP17 of the Core Strategy and CC02 of the MDD are considered to be 'the most important' policies for the determination of this application, given they address both the location of development and the quantum of development in those locations.
- 6.15. Policy CP9 states that development proposals will be acceptable within the development limits of existing settlements at a scale that reflects the level of services and facilities in that location. CP11 states that development proposals will not normally be permitted in the countryside except where one or more of the specified exceptions apply. As none of the above specific exceptions are relevant, the proposals are contrary to Policy CP11 and the council's spatial strategy of CP9.
- 6.16. However, the Core Strategy was adopted in 2012, based on the requirements of the South East Plan and prior to the publication of the first NPPF in 2012. The NPPF introduced an objective to "significantly boost the supply of housing" as per paragraph 61 which is therefore not reflected in the overall housing targets of Policy CP17. A such Policy CP17 is consistent with the NPPF in this regard. The December 2024 NPPF's assessment of the local housing need is significantly greater than planned for by the Core Strategy and, by extension, Policies CP9, CP11 and CC02 are also inconsistent with the NPPF as they limit where development should be located based on delivering the housing requirement set out in CP17. As such, these policies serve to frustrate the delivery of housing at the level that is required at the present time which reduces the weight that can be attributed to them.
- 6.17. The site is located outside of settlement limits and within the Borough's designated countryside. However it adjoins the settlement boundary of Wokingham, the highest order settlement in the Borough, and to this

¹ Appeal ref. APP/X0360/W/24/3350170

² Appeal ref. APP/X0360/W/24/3354667

extent development in this location would not conflict with the objective of Policy CP9 which is to locate development in the most sustainable areas which have the best access to local services and facilities.

- 6.18. Overall therefore, there is a degree of conflict with Policies CP11, CP17 and CC02 but the weight to be attributed to this is limited given these policies are not 'up to date' in the terms of NPPF paragraph 11d. With this in mind, there is no conflict with the objectives of Policy CP9, in as much as this seeks to direct new development to the most sustainable locations within the Borough.
- 6.19. It is therefore clear that the first test is passed and the presumption in favour of sustainable development is engaged.

Second component of the Test: Whether the impact of the proposed development on protected areas or assets provide a clear reason for refusal

- 6.20. The second component part of the test within Paragraph 11 is whether 'The application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed⁷'.

- 6.21. Footnote 7 lists those policies from the NPPF which are relevant to this consideration and is set out below:

'The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 194) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75); and areas at risk of flooding or coastal change. 8 This includes, for applications involving the provision of housing, situations where: the local planning authority'.

- 6.22. Paragraph 194 states that 'The following should be given the same protection as habitats sites:

- a) Potential Special Protection Areas and possible Special Areas of Conservation;
- b) Listed or proposed Ramsar sites; and
- c) Sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites'

- 6.23. The application Site is not subject to any of the designations identified in footnote 7 and clarified within paragraph 194.

- 6.24. As such there is no reason, based on the protected areas or assets described in the NPPF, why the presumption in favour should be disengaged. The second component of the test within Paragraph 11d has therefore been met.

Third component of the Test: Whether the adverse impacts would significantly and demonstrably outweigh the benefits

- 6.25. This test is considered in Section 7, which considers any benefits and adverse impacts of the scheme; and Section 8 considers how these weigh in the balance when determining the planning application.

7. Assessment of Other Planning Considerations

- 7.1. This section of the Planning Statement provides an assessment of the Proposed Development against the adopted Development Plan, National Planning Policy Framework (NPPF), and any relevant material considerations.
- 7.2. This section of the Planning Statement seeks to address key planning issues arising from the proposal. Such issues have been identified through review of the planning policy framework that applies to the site, and through the Pre-Application advice received.
- 7.3. This Planning Assessment focusses on the following matters:
- Suitability of the Site;
 - Design, Scale, Layout and Appearance;
 - Housing Mix and Affordable Housing;
 - Heritage;
 - Landscaping and Arboriculture;
 - Ecology and Biodiversity Net Gain;
 - Highways, Access and Parking;
 - Energy and Sustainability;
 - Flood Risk and Drainage (including application of the sequential test);
 - Noise; and
 - Ground Conditions.
- 7.4. Each of these matters is considered in turn, below. This Statement then considers the scheme's compliance with the draft allocation in Policy SS14.20 of the Local Plan Update.

Suitability of the Site

- 7.5. The NPPF emphasises that the overall purpose of the planning system is to '*contribute to the achievement of sustainable development*' (paragraph 7). Section 5 of the NPPF further emphasises the importance of a mix and variety of deliverable sites to support housing supply. These principles are supported by Policy CP1 of the Core Strategy, which outlines how development proposals will be assessed in terms of their sustainability. Policy CP9 seeks to direct new development to within the development limits of the most sustainable locations in the Borough, which includes Wokingham as a 'major development location' (the highest tier).
- 7.6. The site forms part of a wider area which is a draft allocation set out within Policy SS14.20 of the Local Plan Update: Proposed Submission Plan (LPU), assessed by the Council as Site 5WI009. Policy SS14.20 allocates Land West of Old Forest Road for residential development and provides an approximate capacity of 50 dwellings for the 3.5ha site.

- 7.7. With respect to the wider 5W1009 group allocation, the HEELA states the following:

“The sites are located in the countryside adjacent to the settlement of Wokingham. They are substantially situated between the defined settlement area and the newly constructed North Wokingham Distributor Road. The development forms a logical extension to the context of the existing settlement. Development would not lead to the physical or perceived coalescence of settlements”.

- 7.8. Furthermore, the assessment states *“Overall, the context of the sites is considered appropriate, providing an opportunity for development which broadly conforms to the existing settlement form and landscape character.”*

- 7.9. The Sustainability Statement submitted with the application demonstrates that site is situated in a sustainable location; and the proposed development represents an extension to the existing settlement of Wokingham which Policy CP9 identifies as an appropriate focus for growth (albeit while limiting growth to within the exiting development limits as necessary to deliver the housing requirement of Policy CP17 – see Section 6). The site itself is relatively unconstrained and is not subject to any statutory designations, as explained in the accompanying reports. On this basis, in line with the provisions of the NPPF and the overall provisions of the Core Strategy, the site is highly suitable to help address growth needs particularly in light of the housing land supply shortfall, a factor which should be afforded significant weight i) in the context of the current housing land supply shortfall; and ii) given that particular regard should be had to the sustainable nature of the site in assessing the scheme under paragraph 11d.

Design, Scale, Layout and Appearance

- 7.10. The accompanying Design and Access Statement sets out the approach and design rationale towards delivering a high quality development on the site, based on a detailed assessment of the characteristics of the site and surrounding area and relevant planning policy requirements.
- 7.11. The DAS explains that the proposed layout of the development responds to the constraints and opportunities' for the site and has been delivered with a strong vision which will reinforce the character of Wokingham and the wider area. The design approach set out within the DAS shows a commitment to quality design in both built form and landscape.
- 7.12. The proposed layout seeks to provide 53 dwellings. The dwellings have been designed to encourage active surveillance and overlook the public open space provided across the site. The rear privacy of existing neighbouring properties on Old Forest Road is respected by providing a landscaped buffer along the southern boundary.

- 7.13. An analysis of the existing built form of Wokingham has helped identify patterns of development and key design components. The architectural style across Wokingham is varied whilst retaining some level of consistency in terms of building scale. Materials include red and brown bricks, white render and occasional use of timber or tile cladding, giving the street scene a sense of visual variety and a classic suburban aesthetic in areas.
- 7.14. The height and massing of the proposed development varies across the site. The majority of dwellings are proposed to be 2-storey in nature. The apartment blocks in the western part of the site would be 3 storeys in height and some 2.5 storey units are proposed to transition between these and the lower height houses elsewhere on the site.
- 7.15. The road layout has been designed to encourage low vehicle speeds, with buildings and open spaces taking visual precedence over road infrastructure. This approach enhances walkability, promotes natural surveillance, and discourages anti-social behaviour.
- 7.16. Policy TB08 of the MDD sets standards for open space provision in association with new development. For the scale of development proposals, on-site provision would most appropriately be limited to play facilities and amenity open space (provision for natural/semi-natural greenspace is not considered appropriate given the site's location adjoining the Old Forest Road Meadows SANG).
- 7.17. The scheme proposals include a LAP by way of 'door step' play provision for children aged 6 years and under. This is 100m² in area and is proposed as a natural-style of play area to include items such as small timber play structures, sensory planting, and soft-ground surfacing to ensure safety while encouraging sensory and motor development. The use of timber, boulders and natural planting creates an environment that feels close to nature. The layout of the residential development allows for clear visibility and supervision from the surrounding areas.
- 7.18. Elsewhere around the site, amenity greenspace is proposed as informal green routes and landscaped spaces within the site. The total area of amenity greenspace is 0.41ha and this will help integrate the development into its landscape setting – providing links between the existing landscape structure that defines the site boundaries and the local setting. These green spaces also provide a high degree of amenity value to the future residents and biodiversity benefits.
- 7.19. Resultingly, the proposals accord with Policy CP3 of the Core Strategy that sets out the general principles for good design of new development, a matter to which moderate weight should be afforded. The proposals also comply with the key considerations set out in the Borough Design Guide. Furthermore, the development exceeds the open space requirements as set out in MDD Policy TB08 that seeks to ensure proposals for residential development to provide opportunities to protect and enhance new and existing public open space.

Housing Mix and Affordable Housing

- 7.20. The proposed residential development comprises 53 dwellings which can provide much needed homes for local people and help contribute towards the current housing shortfall. Of the 53 homes, 60% (31) will be for private sale and 40% (21no) will be affordable to meet local needs.
- 7.21. Core Strategy policy CP5 requires any development 'Outside Development Locations' to provide a minimum of 40% of the total number of dwellings as affordable housing on all developments of 5 or more dwellings; the proposed development therefore complies with this policy.
- 7.22. The precise tenure split of the affordable housing will be discussed further with the Council throughout the course of determining the planning application, having regard to the target tenure mix specified within Policy CP5 and current market conditions.
- 7.23. Policy CP5 also requires a mix of housing types and sizes to be provided in new developments, with greater detail contained within Policy TB05 of the MDD. The scheme proposes a mix of detached, semi-detached and terraced houses, as well as apartments; ranging in size from 1 to 4 bedrooms, and thus would strike a balance between reflecting the existing character of the surrounding area, and meeting the projected needs of future households.
- 7.24. Policy TB05 of the MDD requires that 10-20% of new dwellings are delivered as 'Lifetime Homes', and Policy TB07 provides internal space standards to be applied to new developments. The Lifetime Homes standards have been replaced by Building Regulation standard M4(2), and since the adoption of the MDD the NDSS standards have been introduced at the national level. As such, the scheme proposals include provision for 20% of the dwellings to be designed to M4(2) standards, and for all the dwellings to meet the NDSS, thus complying with the objectives of these policies. The proposals also provide flexible dwelling layouts to aid potential home working opportunities, in line with the objectives of these policies.
- 7.25. In this way the scheme proposals accord with Policies CP5, TB05 and TB07 in seeking to deliver a mixed and balanced community, a matter which attracts significant weight in favour of the development.

Heritage

- 7.26. A Built Heritage Statement has been prepared by RPS which provides a proportionate overview of the history of the site and its surroundings, an appraisal of the Site's significance and contribution to the significance of relevant built heritage assets, and an assessment of the potential impacts of the proposed development on that significance (in accordance with the requirements of paragraph 207 of the NPPF).

- 7.27. Toutley Hall, located immediately adjacent to the site's southern boundary, is identified by Wokingham Borough Council within its Local Validation List as a non-designated heritage asset. The proposals are assessed to have minimal potential to negatively impact the non-designated heritage asset of Toutley Hall (including Toutley Hall East).
- 7.28. The level of impact to the building rests upon the alteration of the Site's access road, immediately adjacent to Toutley Hall East's entrance and its eastern boundary wall. Necessary upgrades to the access road for the proposed development are expected to visually alter the character of the immediate setting surrounding the non-designated heritage asset. Consequently, this alteration would lead to a minor degree of harm to its significance.
- 7.29. On this basis, the proposals would result in a minor degree of conflict with policy TB26 of the MDD, which seeks to preserve the setting and special character of Buildings of Traditional Local Character. Paragraph 216 of the NPPF requires the decision-taker to use a balanced judgement when weighing such applications (having regard to the scale of the harm and the significance of the asset) – in this context, the minor degree of harm to the locally (not nationally) significant heritage asset is considered to attract limited weight.

Landscaping and Arboriculture

- 7.30. Policy CC03 of the Core Strategy requires development proposals to protect existing green infrastructure networks, including the protection and retention of existing trees, hedges and other landscape features; promote integration with adjoining public open space or countryside; and incorporate high quality landscaping as part of a development scheme.
- 7.31. In addition, Appendix E of the LPU sets out the development guidelines specific to each site identified as a draft allocation. In terms of the draft allocation for land west of Old Forest Road (ref. SS14.20), one of the specified criteria set out is appropriate landscaping to contribute towards the character of North Wokingham Distributor Road as a green route.
- 7.32. The site includes a total of approximately 28 existing trees which are protected by a Tree Preservation Order. Two Category B trees, T19 Oak and T22 Robina are proposed to be removed to facilitate the development as their trunks will be too close to the edges of the proposed access from Old Forest Road. Although Category B trees, it is noted that one of them (Tree T22) is not protected under TPO-0507-1989. The Arboricultural Impact Assessment confirms that the felled trees can be replaced within new tree planting planned for the proposed site development.
- 7.33. The layout has sought to retain all remaining protected trees within the site, including on the site perimeters. In some instances (as outlined within the submitted Arboricultural Impact Assessment), 'no-dig' construction techniques would be employed to avoid harm to Root Protection Areas (RPAs).
- 7.34. The proposals include a green infrastructure strip along the northern and western boundaries which serve to protect the existing area of the Old Forest Meadows SANG and provide landscaping to contribute towards the character of Toutley Road as a green route. This is proposed as a combination of proposed tree and native hedge planting as illustrated on the Landscape Strategy Plan which accompanies the

application. The landscape proposals should be viewed in the context of the landscaping already secured as part of the NWDR consent, which can already be seen and in time will mature.

- 7.35. In addition, informal green spaces are proposed within the development, as well as a landscaped play area. Potential future links to the Old Forest Road Meadows SANG via land owned by WBC Highways will be discussed throughout the consideration of the application. A Landscape Management Plan has been prepared to support the application, which sets out the Applicant's intent for long term management of the proposed landscaping.
- 7.36. Whilst the loss of the two Category B trees is contrary to the objectives of Policy CC03, the retention of the remainder of the existing green infrastructure and proposals for new, high quality planting on-site means that the proposals are considered, overall, to comply with the objectives of the policy (as well as with the development guidelines outlined within Appendix E of the LPA). The slight degree of conflict resulting from the loss of the Category B trees results in an overall benefit of the scheme, but of limited weight.

Ecology and Biodiversity Net Gain

- 7.37. In general, the scheme proposals aim to retain much of the established boundary vegetation on the site, including trees, which will be protected and enhanced for the benefit of wildlife. As set out in the Ecological Impact Assessment that accompanies the application, a range of mitigation and enhancement measures are proposed to minimise the impact on wildlife utilising the site; and the scheme has been sensitively designed, with areas of the site to be retained and managed sympathetically to enhance their ecological value in the long-term. In this way the scheme proposals would comply with the objectives of Policies CP7 of the Core Strategy and TB23 of the MDD.
- 7.38. Biodiversity Net Gain is now a statutory requirement under the Environment Act which requires net gains of 10% for hedgerows and habitats. The proposals overall would result in an overall loss of habitat units. Whilst some habitat losses can be mitigated on-site, an offsite solution will be used to account for the lost habitat credits resulting in a net gain of at least 10%, and this would be secured by condition.

Highways, Access and Parking

- 7.39. A Transport Statement has been produced by Stuart Michael Associates to support this application. Research undertaken in connection with the assessment has included the following:
- Review of local and national planning policy guidance;
 - Assessment of existing public transport provision, timetable information, bus routes and rail services;
 - Assessment of provisions for pedestrians and cyclists;
 - Assessment of existing traffic conditions on the local highway network by way Automatic Traffic Counts (ATC);
 - Assessment of the road safety record on the surrounding highway;
 - Analysis of the impact of development traffic, together with background growth, on the operation of the local highway network; and

- Consideration of appropriate measures to adequately mitigate the development proposals.

- 7.40. The Transport Statement confirms that a safe and suitable access can be achieved for all users with permeable footways provided within the site and connections to the existing footway network proposed along Old Forest Road. Swept path analysis has been carried out and demonstrates that emergency and refuse vehicles can safely access the site in an appropriate manner.
- 7.41. A Travel Plan has also been prepared to promote sustainable travel practices and set objectives and measures for achieving these.
- 7.42. A Stage 1 Road Safety Audit has been carried out to ensure proposed site access improvements onto Old Forest Road. The points raised in the audit have been addressed within the designer's response section of the report. Minor amendments have been made to the proposed access and vehicle swept path drawings to address these comments.
- 7.43. The site benefits from an established network of footways which provide safe and convenient pedestrian access to surrounding areas. Existing footways along Old Forest Road provide access to existing service and facilities including recreation, retail and public transport provisions within the centre of Wokingham.
- 7.44. In terms of the internal layout, the site will provide a comprehensive network of internal streets, cul-de-sacs and shared spaces, meeting the needs of users not only in terms of travel but also as places to live. These will be subject to a design speed of 20mph, whereby priority will not be given to vehicles but shared with pedestrians and cyclists.
- 7.45. On this basis, it has been demonstrated that the development would not adversely impact on the local highway network and the scheme accords with local and national policy objectives to promote sustainable travel opportunities. The proposed development therefore accords with Policy CP6 of the Core Strategy and paragraphs 109, 110 and 117 of the NPPF.
- 7.46. Car cycle parking will be provided in line with the Wokingham Council Parking Standards, contained within the Housing Allocations DPD and complies with MDD Policy CC07.

Energy and Sustainability

- 7.47. An Energy and Sustainability Statement has been prepared by Stuart Michael Associates which provides an outline summary of the range of sustainability options to be considered, having regard to the objectives of Policy CC04 and CC05 of the MDD where these seek to secure sustainably designed and constructed new homes and reduce carbon emissions associated with new development. It should be noted that the Code for Sustainable Homes referred to in Policy CC04 is now longer in use but the objectives of the Policy – to require new development to contribute towards environmental sustainability and the mitigation of climate change – remain consistent with the NPPF.

7.48. Following completion of this assessment, it is considered that there are a range of technically feasible low carbon or renewable energy systems that could be incorporated into the proposed development. The following measures have been recommended as potentially most suitable:

- Rooftop solar PV;
- Integrated air source heat pumps;
- Batteries for electricity storage, for at least a portion of the units;
- EV charging facilities at each unit;
- Tree planting
- Environmental enhancements, such as bird, bat and bee boxes, and hedgehog highways;
- Community integration through provision of footpaths and cycle routes linking the site to its surrounds;
- Resource management through community composting facilities and water butts at each unit; and/or
- Travel Plan Measures.

7.49. Overall it is expected that the requirements for 10% carbon reduction will be met on site through a range of measures, the detail of which can be secured by condition. In this way, the scheme demonstrates compliance with Policies CC04 and CC05 of the Core Strategy, to which moderate weight should be afforded.

Flood Risk and Drainage

Flood Risk

7.50. Review of the Environment Agency flood maps for planning show that the site is at low risk of flooding from reservoirs, rivers, and from coastal flooding. The majority of the site is at very low to low risk of surface water flooding; however there is an area of low, medium and high surface water flood risk in the centre of the site, and on Old Forest Road outside the site access.

7.51. Paragraph 170 of the NPPF seeks to direct new development away from areas at highest risk of flooding. It requires all plans to apply a sequential, risk-based approach to the location of development by, in the first instance, applying the sequential test (paragraph 172). Where planning applications then come forward on sites allocated in the development plan through the sequential test, the test need not be applied again (paragraph 180). Paragraph 175 clarifies that the sequential test should be used in areas known to be at risk of flooding, except in situations where a site-specific flood risk assessment demonstrates that no built development within the site boundary, including access or escape routes, land raising or other potentially vulnerable elements, would be located on an area that would be at risk of flooding from any source. The PPG classifies residential development as a 'more vulnerable' use.

7.52. Policy CC09 of the MDD reiterates that development should be guided to areas of lowest flood risk by applying the sequential approach.

- 7.53. As demonstrated by the Flood Risk Assessment (FRA) which accompanies the application, the scheme proposals steer new built development towards areas of the site at low risk of flooding, in compliance with paragraph 170 of the NPPF and Policy CC09. In addition, the FRA demonstrates that safe access and egress would be available to all properties. This compliance with the relevant local and national policies is afforded moderate weight in the planning balance (see below).

Sequential test

- 7.54. A Sequential Test has been undertaken in support of the planning application, which assesses whether there are any alternative sites which could deliver the scheme proposals, in locations that are sequentially preferable in terms of flood risk. The Test has considered the potential for alternative sites based on geographical area (the Borough), level of flood risk (low, medium and high), availability of the sites, and whether in combination any site(s) could deliver a comparable quantum of housing.
- 7.55. The initial sifting exercise finds only 7 sites that are potential suitable alternatives to the application site. These are assessed in detail but none are considered to be sequentially preferable to the application site for various site-specific reasons. The proposed development therefore passes the Sequential Test of paragraph 172 of the NPPF, a factor which attracts moderate weight.

Sustainable Drainage

- 7.56. In line with the objectives of national policy and Policy CC10 of the MDD, the proposals seek to ensure the sustainable management surface water arising from the development, including taking climate change into account. Analysis of the sites geology indicates that infiltration techniques would not be a suitable method of surface water disposal; nevertheless a SUDs basin is proposed in the north eastern corner of the site to provide attenuation in line with the hierarchy of drainage options set out in the PPG. It is also proposed that surface water will be managed to drain to the existing ditches onsite; and porous paving is proposed in certain locations throughout the site to provide attenuation source control, conveyance of surface water, and water quality benefits.
- 7.57. In terms of foul water drainage, it is proposed that a pumped connection will be provided to the existing sewer within Old Forest Road.
- 7.58. In this way, the scheme proposals would accord with the objectives of Policy CC10 and with the NPPF, to which moderate weight is attached.

Noise

- 7.59. A Noise Assessment has been prepared by Stuart Michael Associates. The assessment identified from on-site observations that road traffic noise is the dominant noise source in the area due to the site being bound by Toutley Road to the north and the M4 Motorway further to the north.
- 7.60. The impact of noise from Toutley Road and the M4 Motorway and the broader highway network on the proposed dwellings has been assessed in accordance with British Standards, NPSE, World Health

Organisation guidelines, ProPG: Planning and Noise Guidance and local planning guidance. In addition, noise measurements have been undertaken using the measurement method as detailed in the Calculation of Road Traffic Noise (CRTN).

- 7.61. The daytime noise levels for the whole of the site measured above 55 dB LAeq,16hr, while the nighttime noise levels for the whole of the site measured above 45 dB LAeq,8hr. Facade noise levels were calculated at the approximate locations of the proposed dwellings, with facades facing north west predicted to experience the highest noise levels.
- 7.62. Mitigation measures have been suggested to help reduce internal and external noise levels to below guidance levels, based on the noise levels reaching above 50 dB during the day and 45 dB during the night. This includes the use of double-glazed windows incorporating acoustically attenuated ventilation with comparable sound reduction will reduce internal noise to within guideline levels. In terms of the noise levels experienced in private gardens, plots within the development site will have an area which is predicted to experience daytime noise levels below 55 dB.
- 7.63. The worst-case impacts of construction noise at nearby sensitive residential properties was also calculated. The access road was considered to cause the greatest short term impact due to the distance between the site boundary and the existing houses. However, the assessment confirms that best practical means should be adopted to minimise construction noise insofar as possible.
- 7.64. Based on the above, the proposals are in accordance with MDD Policy CC06 and paragraphs 180 and 193 of the NPPF which seek to ensure that the noise impact of development is assessed and any impacts are mitigated and reduced to a minimum. Appendix 1 of the MDD states that when assessing the acceptability of proposed noise sensitive development, the council will determine the effect of noise from any adjacent and nearby sources will have on noise sensitive receptors taking into account daytime and nighttime noise levels.

Grounds Conditions

- 7.65. A Geoenvironmental Report has been prepared to support the application which provides the results of desk based and on-site investigations.
- 7.66. No contamination has been identified and thus no remediation measures are proposed. The report confirms that if unforeseen contamination is encountered during construction works such as localised spillage outside the areas investigated, an environmental consultant will be available on a 'call out' basis to undertake an assessment of risk. If unforeseen contamination is encountered such as hydrocarbon contamination or solvent odours, the discovery strategy will be to remove the source as it is likely to be very limited in extent or encapsulate it on site as appropriate and advise the Local Planning Authority. This is expected to be secured by condition.
- 7.67. The proposals are therefore in accordance with paragraphs 196 and 198 of the NPPF and the Borough's Contaminated Land Survey that seek to ensure necessary measures are taken to mitigate any risks

arising from land instability and contamination taking into account the effects this has on the health, living conditions and the natural environment.

Compliance with Policy SS14.20

- 7.68. It is noted that WBC consider this Policy to have only limited weight, given the LPU is yet to be Examined fully by an independent Inspector. Nevertheless, for the purpose of weighing the planning balance (as required by paragraph 11d of the NPPF) when determining the application, it is useful to assess the scheme proposals against its requirements.
- 7.69. Overall, the fact of the draft allocation in the LPU confers the Council's acceptance of the sustainable location of the site, and its ability to contribute towards the overall objective of achieving sustainable development in the Borough.
- 7.70. The number of dwellings proposed in this application, 53, exceeds the indicative site capacity for the allocation as a whole (of which the application site forms only part). However, the reasoned justification to the policy (at paragraph 5.116) notes that the number of dwellings listed for each draft allocation is indicative only, *"and does not represent a fixed requirement for each site. Those proposing development are encouraged to produce the most appropriate design-led solution, taking all relevant local and national policies, in arriving at a total dwelling figure for their site"*. Importantly, the reasoned justification goes on to state that *"The design-led approach should not be unnecessarily constrained by the indicative figure"*. Through the pre-application discussions with WBC, and informed by the detailed design and technical work which supports the application, it has been established that the quantum of development proposed can appropriately be provided and thus any exceedance of the indicative capacity of the allocation as a whole should not be taken as deleterious to the proposals. Indeed, as encouraged by the NPPF (paragraph 129), the opportunity should be taken to achieve appropriate densities so as to use land efficiently.
- 7.71. Appendix E contains a set of guiding principles by which proposals for development within allocation SS14.20 should be assessed. These are considered in turn below:
- *Vehicular access preferred from Old Forest Road
The proposed access is taken from Old Forest Road and has been shown to be appropriate in highway safety terms;*
 - *Development should avoid the existing area of Old Forest Meadows SANG
All land in the application site lies outside of the designated SANG;*
 - *Opportunities to provide pedestrian connectivity to adjacent areas of green space at Old Forest Road Meadows SANG and to the shared pedestrian / cycle path along the North Wokingham Distributor Road
There is the potential for pedestrian and cycle connections across and into adjoining land parcels, including to the north (over land controlled by WBC Highways) towards the SANG and Toutley Road. This will be discussed with WBC throughout their consideration of the application and, if necessary, secured by condition or s106 agreement;*
 - *Appropriate landscaping to contribute towards the character of North Wokingham Distributor Road as a green route*

An indicative landscape strategy has been submitted with the application, and full details of hard and soft landscaping would be secured by condition. The layout shows how appropriate landscape buffers and green infrastructure can be provided through the development to assist in creating the character of a green route along Toutley Road;

- *That surface water corridors within the site are left free of development*

The submitted FRA and Drainage Strategy shows how new built development would be directed towards areas of low flood risk and surface water impacts would be mitigated e.g. through provision of a SUDS attenuation basin and use of porous paving;

- *Demonstrate that safe access and egress is achievable during surface water flood events for both residents and emergency vehicles*

The Flood Risk Assessment and Drainage Strategy which accompanies the application demonstrates how flood risk would be mitigated and that safe access and egress would be achievable for all residents in times of surface water flooding; and

- *Undertake a heritage impact assessment*

A Built Heritage Statement has been submitted in support of the application, the conclusions of which have been used to inform the assessment of the application under the titled balance (see Section 8).

7.72. It is evident from the above that the scheme proposals would comply with all the requirements of Policy SS14.20 including the guiding principles at Appendix E. This weighs in favour of the development, to a moderate degree (given the Policy is not yet part of the adopted Development Plan).

7.73. The following Section of this Planning Statement considers how the weight to be attributed to each of these matters informs the assessment required under paragraph 11d of the NPPF; namely whether any adverse impacts of granting planning permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

8. Planning Balance

8.1. Paragraph 8 of the NPPF sets out the social, economic and environmental roles of sustainable development as follows:

- a) *An economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*
- b) *A social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*
- c) *An environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.*

8.2. The following section identifies the benefits of the Proposed Development, having regard to these objectives. In considering the weight to be afforded to each consideration, the following scale of weight is applied:

Significant
Moderate
Limited

Benefits	Adverse Impacts
Provision of new market housing (32 dwellings), to help boost the supply of homes in Wokingham Borough and contribute towards the current shortfall in the 5 year housing land supply Significant weight	Limited harm to the setting of a non-designated heritage asset, contrary to Policy TB26 Limited harm
Provision of 40% affordable housing (21 dwellings), to help meet local needs Significant weight	Removal of two protected Category B trees at access on Old Forest Road contrary to Policy CC03. Limited harm

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Provision of a range of housing types and sizes, to address local needs and provide choice in the local housing market Moderate weight	
Making effective use of land in a sustainable location (adjoining the exiting development limits of Wokingham, which is in the highest tier of settlements in the Borough), which is suitable for the scale and nature of the development proposed and is accessible by a range of transport means to local services and facilities. The site has been identified as suitable for development in the emerging Local Plan Update under Policy SS14.20 Significant weight	
Delivery of on-site play facilities to meet the needs of future residents Moderate weight	
Creation of direct employment opportunities through construction, alongside the creation of indirect employment opportunities. Moderate weight	
Economically active residents contributing to spend in the local area. Moderate weight	
Increased Council Tax Receipts and CIL contributions towards local infrastructure including education, highways and health. Moderate weight	
Enhancement of green infrastructure on the site, including hedgerows; new native planting; and measures to secure the long term management. Moderate weight	
Compliance with the Sequential Test, whereby development is steered to areas away from the highest risk of flooding. Moderate weight	

Securing a minimum of 10% biodiversity net gain.	
Moderate weight	
Securing measures to reduce carbon use by at least 10% as required by Policy CC05	
Moderate weight	

8.3. In the above table, considerations relating to the provision of affordable housing, the sustainable location of the site, and making effective use of land are attributed significant weight in line with paragraph 11d) (ii) of the NPPF.

8.4. Conclusions

8.5. The NPPF states that

*“Plans and **decisions** should apply a presumption in favour of sustainable development. ... For decision-taking this means: ...*

*d) Where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date..., **granting permission** unless:*

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

ii) Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole”.

8.6. Footnote 8 states that, in considering policies which are ‘out of date’, *“This includes, for applications involving the provision of housing, situations where: the local planning authority cannot demonstrate a five year supply of deliverable housing sites (with the appropriate buffer as set out in paragraph 78)...”*.

8.7. As set out above, the Council cannot currently demonstrate a five year housing land supply and the most important development plan policies relevant to this application are ‘out of date’. As the site also does not lie in a protected area, paragraph 11d) of the NPPF states that planning permission should be granted unless ‘*any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.*’

8.8. There are clear benefits of the proposal, as set out in the table above, which must be weighed against the limited harms. Overall it has been demonstrated that there are no technical or environmental impacts that would significantly and demonstrably outweigh the considerable benefits of the proposal. Indeed, the scheme proposals would deliver social, environmental and economic benefits to the local and wider area, ensuring that the three objectives of sustainable development are achieved.

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Appendix 1

Proposal for circa 55 homes on Land off Old Forest Road, Winnersh



Elstree Land are seeking your views on the proposed development of Land off Old Forest Road, Winnersh prior to a planning application. The site forms part of Wokingham's Borough Councils emerging Local Plan as a proposed housing allocation and as such we believe that this site is very suitable to help deliver much needed market and affordable homes.

Overview of the proposals:



A residential development of around 55 new energy efficient homes ranging from 1- 4 bedroom properties.



The mature trees and important landscape features are an integral element of the schemes evolution, with a Biodiversity net gain target of in excess of 10%.



40% of the properties will be affordable housing. This includes a mix of First Homes, Social Rent and Shared Ownership, in line with the Council policy requirements.



We are undertaking highways analysis to inform if improvements will be required to the local road network to accommodate the proposed development.



Energy efficient homes including the use of air source heat pumps, electric charging points and integrated building fabric improvements.



Car and cycle parking in line with Wokingham Borough Council's standards.



Homes are traditionally styled, with the use of feature brick detailing, tile hanging and weatherboarding.



Delivery of a new and improved road, footpath, cycle and lighting from Old Forest Road into the development.



Feedback

We are inviting feedback on our designs for Land off Old Forest Road, Winnersh. Please take a moment to give us your feedback via danielbradbury@elstreeland.co.uk

Our public consultation runs until Thursday 15th May 2025, so please let us know what you think before then. Following consultation, we will use your feedback to help improve our plans as we prepare our planning application.

Community Benefits:

Housing being delivered in accordance with Wokingham's emerging local plan , meeting standards in terms of design, sustainability and style.



Local economic benefits, including the creation of jobs and additional expenditure in the local economy to the benefit of local shops and businesses.



Much needed new private and affordable housing sustainably located close to amenities and services.



Proposed contributions to employment skills plans, travel plans, local open space and play equipment on top of Wokingham's CIL requirements.



40% affordable housing including First Home, Social Rent and Shared Ownership in accordance with Wokingham's policies.



New junction and road linking Old Forest Road to the proposed development.



Over £1,500,000 in community payments to the council.

Appendix 2

