
APPELLANT'S STATEMENT OF CASE

**LAND NORTH OF READING ROAD,
ARBORFIELD**

Appeal against the decision of Wokingham Borough Council to refuse outline planning permission for up to 111no. dwellings with associated works, parking, landscaping, publicly accessible open space, with access from Reading Road (All matters reserved save for means of access).

Prepared by: Woolf Bond Planning Ltd

On behalf of:

Dandara Southern Ltd and Elstree Land Ltd

LPA Ref: 243099

WBP Ref: 9015

August 2025



Woolf Bond Planning
Chartered Town Planning Consultants

CONTENTS

1.0	Introduction and Overview	2
2.0	The Appeal Site and Surrounding Area	9
3.0	The Appeal Scheme	13
4.0	Decision Making Framework - The Development Plan and Other Material Considerations	20
5.0	The Appellant's Position on the Main Issues for Determination in this Appeal	46
	The Principle of Development	
	Quantum and Scale of Development	
	Impact on the Landscape and Countryside	
	Sustainability of the Location	
	Loss of Agricultural Land	
	Flood Risk and Impact on Main River Watercourse	
	Mitigation of Impacts on Thames Basin Heaths SPA	
6.0	Consultation Responses and Public Representations	62
7.0	Planning Obligations and Conditions	64
8.0	Planning Balance	65
9.0	The Justification for the Inquiry Procedure	72

1.0 Introduction and Overview

General

- 1.1. This Statement of Case has been prepared by Woolf Bond Planning LLP in support of an appeal ("the Appeal") by Dandara Southern Ltd and Elstree Land Ltd ("the Appellant") against the decision of Wokingham Borough Council ("the Council") to refuse their outline application ("the Application") for the proposed erection of up to 111 no. dwellings with associated works, parking, landscaping, publicly accessible open space and access from Reading Road (LPA Ref: 243099) ("the Application Scheme", now "the Appeal Scheme") on land north of Reading Road, Arborfield ("the Application Site", now the "Appeal Site"). All matters other than access are reserved.
- 1.2. The Appellant issued a notice of an intention to submit an appeal to PINS and the Council on 10 July 2025.
- 1.3. The Appellant is seeking the Inquiry procedure (see section 9 below). Accordingly, this Statement of Case ("SoC") is accompanied by a draft Statement of Common Ground ("SoCG") that the Appellant will seek to agree with the Council. As part of the SoCG process, the Appellant will also seek to agree draft conditions and a list of Core Documents with the Council.

The Council's Decision to Refuse Planning Permission

- 1.4. The Application was refused on 20 May 2025, under delegated powers. The reasons for refusal were as follows:
 - Reason for Refusal 1 - The principle of development: "The location of this unplanned development on a greenfield site in the countryside is unacceptable in principle due to the countryside location outside of settlement boundaries; it's appreciable detachment from any recognised settlement limits and the resulting quantum of development that would be substantially out of scale with the immediate locality. The development conflicts with the spatial objectives of

the development plan and policies CP1, CP2, CP3, CP6, CP9 and CP11 of the Core Strategy, CC01, CC02 and TB21 of the MDD Local Plan, Policies IR1, IR2 and AD1 of the Arborfield and Barkham Neighbourhood Plan, the Borough Design Guide SPD and sections 2, 4, 8, 9, 12 and 15 of the NPPF.”

- *Reason for Refusal 2 – Quantum and Scale of Development:* “The proposed location and quantum of development would result in a development with a scale, character and density that is out of keeping with character and appearance of the area and countryside, resulting in a harmful detrimental impact on the locality, contrary to policies CP1, CP3, CP9 and CP11 of the Core Strategy, CC02, CC03 and TB21 of the MDD Local Plan, IR2, AD1 and AD3 of the Arborfield and Barkham Neighbourhood Plan, the Borough Design Guide SPD and sections 2, 4, 8, 9, 12 and 15 of the NPPF”
- *Reason for Refusal 3 - Impact on the landscape and countryside:* “The proposed development will have a detrimental impact on the landscape and character & appearance of the area by reason of the loss of fields, paddocks and green infrastructure in the countryside and the erection of a large housing development that is out of keeping with the locality, contrary to policies CP1, CP3, CP9 and CP11 of the Core Strategy CC02, CC03 and TB21 of the MDD Local Plan, IR2, AD1 and AD3 of the Arborfield and Barkham Neighbourhood Plan, the Borough Design Guide SPD, the Wokingham District Landscape Character Assessment and sections 12 and 15 of the NPPF.
- *Reason for Refusal 4 - Unsustainable Location:* “The application site is within an unsustainable location that would not encourage a modal shift towards sustainable modes of transport, by reason of the countryside location outside of settlement limits, distances to facilities and services and poor quality of the local walking environment, contrary to policies CP1, CP2, CP3, CP6 and CP11 of the Core Strategy, Policies CC01 and CC02 of the MDD Local Plan, the Borough Design Guide SPD and section 8 & 9 of the NPPF.
- *Reason for Refusal 5 - Best and Most Versatile Agricultural Land:* “Part of the site is grade 3a Agricultural Land and therefore the development results in the

loss of Best and Most Versatile agricultural land, contrary to Core Strategy policy CP1 and section 15 of the NPPF.”

- Reason for Refusal 6 - Impact on Main River Watercourse: “Part of a main river runs along the southern boundary and insufficient information has been submitted to demonstrate that the proposed development will not adversely impact on flood risk or the watercourse, contrary to policy CC10 of the MDD Local Plan, CP1 and CP3 of the Core Strategy, AD4 of the Arborfield and Barkham Neighbourhood Plan and section 14 of the NPPF.”
- Reason for Refusal 7 – Avoidance and Mitigation of Impacts on the Thames Basin Heaths SPA: “In the absence of a planning obligation to secure suitable avoidance and mitigation measures and access management monitoring arrangements, in terms that are satisfactory to the Local Planning Authority (LPA), the LPA is unable to satisfy itself that the proposals include adequate mitigation measures to prevent the proposed development from having an adverse effect on the integrity of the Thames Basin Heaths SPA, in line with the requirements of Regulation 63 of the Conservation of Habitats and Species Regulations 2017 as amended and Article 6(3) of Directive 92/43/EEC. The proposal would be contrary to Policy NRM6 of the South East Plan, Policies CP8 and CP4 of the Core Strategy.”
- Reason for Refusal 8 – Section 106 Planning Obligation: “In the absence of a completed legal agreement, the proposal fails to secure opportunities for training, apprenticeships, and other vocational initiatives to develop local employability skills contrary to MDD Policy TB12.
- Reason for Refusal 9 – Section 106 Planning Obligation: “In the absence of a completed Legal Agreement, the scheme fails to make adequate provision for affordable housing, contrary to policy CP5 of the Core Strategy and Section 5 of the NPPF.
- Reason for Refusal 10 – Section 106 Planning Obligation: “In the absence of a completed Legal Agreement, the proposed development fails to make adequate contributions to sport and recreational facilities, contrary to MDD Local Plan policy TB08, Core Strategy policy CP4 and sections 4 and 8 of the NPPF.”

Overview of the Appellant's Case

Spatial Matters: The Principle of Development

- 1.5. The Appellant's case is as follows. Although there is a degree of conflict with the settlement boundaries established under policies CP9 and CP11 of the Core Strategy ("CS"), CC02 of the Managing Development Delivery Local Plan ("MDD") and AD1 of the Arborfield and Barkham Neighbourhood Plan ("NHP"), the weight to be attached to this conflict is limited. This is because (i) the development plan is out of date in terms of the spatial application of its housing policies, and these policies are frustrating the delivery of identified housing needs (as recognised recently but the Inspector in Appeal Reference APP/X0360/W/24/3354667 - Land adjacent to Blagrove Lane, Wokingham RG41 4AX, decided 29 May 2025, paragraph 20) whilst, in addition, (ii) the Council is not able to demonstrate a five year supply of deliverable housing land.
- 1.6. Either scenario (i) or (ii) above triggers the presumption in favour of sustainable development at paragraph 11(d) of the NPPF. In so far as there are no strong reasons for refusal at paragraph 11(d)(i) of the NPPF, the Appeal falls to be positively assessed under paragraph 11(d)(ii).
- 1.7. The adverse impacts of granting planning permission relating to (a) development beyond a defined settlement boundary (in an out of date development plan), (b) localised landscape impact; and (c) loss of agricultural land, would not significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF 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
- 1.8. Whilst detached from any defined settlement limits in the out-of-date spatial strategy, the Site is in fact adjacent to development on three sides (to the north, west and south, as set out in the Council's landscape architect's response). It

is adjacent to Arborfield, which is the historic core of the village (as set out in the NHP). As such, whilst detached from a defined *settlement boundary*, it is not detached from a *settlement*.

- 1.9. The current settlement boundaries defined in the Development Plan cannot be maintained in their current position if the current identified market and affordable housing needs are to be met. The Local Plan Update, as submitted for examination, clearly evidences this fact. It proposes significant new allocations in the countryside in order to address identified housing needs. These factors are material considerations of significant weight in the consideration of this Appeal.
- 1.10. As the most important policies (relating to housing delivery, and the spatial application of housing policies) are out of date (due to failure to meet identified housing needs, and therefore inconsistency with the NPPF, and also due to the inability to demonstrate a five year supply of deliverable housing land), the presumption under paragraph 11(d) of the NPPF is engaged. There are no footnote 7 matters which provide any strong reason for refusal.
- 1.11. As explained above, applying paragraph 11(d)(ii) of the NPPF, the adverse impacts of granting planning permission would not significantly and demonstrably outweigh the benefits when assessed against the policies in the NPPF taken as a whole.
- 1.12. The Appeal Scheme conflicts with the settlement policy boundaries identified under Policies CS CP9, CP11, CC02 of the MDD and AD1 of the NHP, which attracts **limited** weight. It will result in the loss of a very small area of good quality agricultural land, which also attracts **limited** weight, as well as causing landscape impacts, which also attracts **moderate** weight in the planning balance.
- 1.13. Set against this, there are substantial economic and social benefits and moderate environmental benefits which clearly outweigh the potential harm.
- 1.14. The Appeal Scheme will deliver up to 111 dwellings which makes a significant contribution to the housing shortfall. This includes up to 44 affordable dwellings

in an area of high demand for the same. These factors are afforded **substantial** weight.

Quantum and Scale of Development

- 1.15. The proposed quantum of this outline scheme can be comfortably accommodated on the Site at a density which makes efficient use of the Site whilst minimising impacts on character of the prevailing area. It is noted that the prevailing density along Church Road is lower than the proposal but development at such low density would fail to accord with national policy and guidance.

Landscape Impact

- 1.16. Whilst a change in landscape character is unavoidable, the changes will relate to the landscape and townscape context associated with the Site., Furthermore, the Site is not identified as being a valued landscape in the Council's evidence base, following scrutiny of the borough. Given the vast extent of land which is proposed for such designation in the emerging Local Plan it is clear that development of the Site will avoid other more valued and sensitive parts of the borough's countryside. Given the extent of the housing shortfall this is material. Visual impacts will be limited and localised. The landscape and visual harms are afforded **moderate** weight.

Locational Sustainability

- 1.17. The Site benefits from a premium bus service with regular services to Reading and Wokingham throughout the week including Sundays. The Site is a walkable/cyclable distance to the local primary school at Arborfield Cross (approximately 1km by road, with footpath for the full extent) and the nearest secondary, Bohunt at Arborfield Green, is 3.5km by road. This is well within the distance which education authorities consider suitable for independent travel via cycling/ walking (based on eligibility criteria for free school transport). The Site is a sustainable location for new development. This point was accepted by the Highway Authority.

Agricultural Land

- 1.18. Only a 0.7ha parcel of land within the Site qualifies as 'Best and Most Versatile' (BMV) Agricultural Land (at Grade 3a). Very limited weight should be afforded to its loss, consistent with the approach taken by the Council on other schemes nearby. The Site is not in agricultural use, and 0.7ha could not be productively used for agriculture in an efficient manner. Furthermore, this higher quality part of the Site will remain undeveloped as public open space.

Flood Risk and Drainage

- 1.19. The issues raised in the decision notice/ officer report are matters covered by the Environmental Permitting regime. Creation of the access over the 'Main River' drainage ditch along the southern site boundary will require a permit, to ensure no unacceptable impact on water quality.

Planning Obligations

- 1.20. As set out in section 7 below, the Appellants will negotiate with the Council an appropriate planning obligation mechanism under the provisions of Section 106 of the Town and Country Planning Act 1990 to resolve Reasons for Refusal 7 to 10.

Summary

- 1.21. Although the Appeal Scheme conflicts with the out-of-date settlement policy boundaries, and is in conflict with the development plan when taken as a whole, the weighty material considerations (including the tilted balance under NPPF) support the grant of planning permission for the development of much needed homes (including affordable), in a sustainable location within walking/cycling distance of both a primary and secondary school, and on a premium bus route, offering regular bus services to Reading and Wokingham.

2. The Appeal Site and Surrounding Area

The Appeal Site

- 2.1. Extending to approximately 6.44ha, the Appeal Site is shown edged red on the Site Location Plan (Reference 052403-DAN-LOC01).
- 2.2. The Appeal Site comprises privately owned fields, a paddock, and a caravan storage area. The Site boundaries are demarked by hedgerows and mature trees to the east, west and south with residential development abutting the northern and part of the southern boundaries.
- 2.3. There is an existing private pedestrian and vehicular access point to the Appeal Site from Reading Road; this is proposed to be utilised as the access point for the proposed development.
- 2.4. A watercourse traverses the western part of the Appeal Site and thereafter runs along the southern Site boundary, parallel to Reading Road. This watercourse is classified a Main River by the Environment Agency. As such, an 8m maintenance strip has been allowed for in the illustrative masterplan proposals.
- 2.5. The Multi Agency Geographic Information for the Countryside Map ('MAGIC') and the Proposals Map indicates that the Site is not covered by any statutory designations for landscape character or quality.
- 2.6. The Site is within the Zone of Influence around Thames Basin Heaths Special Protection Area ("SPA") and accordingly there is a requirement to mitigate the risk of additional recreational pressure on that SPA via contribution to Suitable Alternative Natural Greenspace ("SANG").
- 2.7. The Site is not within any Conservation Areas and there are no Listed Buildings on the Site itself (the nearest being two Grade II listed buildings located to the northwest and northeast of the site on Church Lane, Arborfield). In accordance with sections 66(1) and 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 ("the LBCA Act"), the masterplan approach has

paid special regard to the desirability of preserving the wider setting of those listed buildings potentially affected by the proposals, as well as any features of special architectural or historic interest which they may possess.

Locational Context

- 2.8. The surrounding area is semi-rural in character with bands of residential development set back from the highway within leafy frontages.
- 2.9. Views into the Appeal Site from public viewpoints are generally limited to glimpsed views from Reading Road and Church Lane, due to the well-vegetated Site boundaries and surrounding built form. Additionally, there are some localised viewpoints into the Site from adjoining properties along Church Lane, to the north of the Site, although existing vegetation affords a degree of screening.
- 2.10. To the north and west of the Appeal Site is the historic settlement of Arborfield, characterised by a string of residential development along Church Lane. The Arborfield and Barkham Neighbourhood Plan (which forms part of the Development Plan against which the acceptability of the Appeal Scheme is to be assessed) expressly identifies this historic core of Arborfield as a separate settlement to Arborfield Cross. As such, the Appeal Site is adjacent to and on the edge of the historic core settlement of Arborfield, which is identified in the Development Plan as a settlement in its own right (albeit one which is not identified - in the out of date spatial strategy - as being suitable for additional development).
- 2.11. To the immediate south of the Appeal Site, on the opposite side of Reading Road, is existing residential development along Waldren Avenue and the Cross Lands Farm complex. Land to the immediate east of the Appeal Site is of open character associated with the Lockey Farm complex.

Accessibility

- 2.12. The Appeal Site is well related to existing surrounding urban environments. The settlements of Arborfield Cross and Arborfield Green (including the Arborfield

Garrison strategic development location) are walkable/cyclable from the Site, with local amenities including primary school, public house, convenience store and recreation ground available approximately 1km to the west of the Site at the settlement of Arborfield Cross.

2.13. The larger settlements of Wokingham and Reading are easily accessible by regular bus service. Bus route Leopard 3 (running between Reading and Wokingham) provides a regular service (Monday – Saturday 2-4 buses/hour from 06:05 to 23:36 and Sundays 2 buses/hour running from 08:39 to 21:44). There is an existing bus stop from which to utilise this service, adjacent to the Appeal Site's southern boundary.

2.14. Accordingly, the Appeal Site affords a sustainable location in which to meet identified housing needs.

2.15. For ease of reference, we highlight at this juncture other sites in the immediate locality of Arborfield, and within Wokingham Borough Council's administrative area, where recent planning decisions set out material considerations in the determination of this appeal:

- Land to the north of School Road Arborfield Cross - LPA Ref 250735 – Wokingham's planning committee followed their officer's recommendation to approve a scheme of up to 70 dwellings (subject to s106); (9 July 2025).
- Land off Langley Common Road, Arborfield, Wokingham - LPA Ref 232490 – Wokingham's planning committee followed their officer's recommendation to approve a scheme of up to 50 dwellings in the countryside between Arborfield Cross and Arborfield Green (subject to s106). The officer is the same officer who prepared the officer's report for the Appeal Scheme.
- Land adjacent to Blagrove Lane, Wokingham RG41 4AX (Appeal Ref: APP/X0360/W/24/3354667) (LPA Ref 222306) – Appeal determined May 2025, allowing a scheme of up to 350 dwellings and C2 care home.

- Land west of Trowes Lane and north of Charlton Lane, Swallowfield RG7

1RT (Appeal Ref: Appeal Ref: APP/X0360/W/24/3340006) (LPA Ref 230422) – Appeal determined July 2024, allowing a scheme of up to 81 dwellings.

- 2.16. Overall, and for the reasons stated, there are no environmental or statutory designations that would otherwise serve to limit the development potential of the Site.

3. The Appeal Scheme

Introduction

- 3.1. The Application was developed and informed following a thorough review of the opportunities and constraints afforded by the Application Site.
- 3.2. The Appeal Scheme proposes up to 111 dwellings (C3 Use), including up to 44 affordable homes (40%) along with associated landscaping and open space with access from Reading Road.
- 3.3. Only the principle of developing the site for up to 111 dwellings and associated works. (as described above), together with the means of access are to be determined as part of this appeal. Appearance, landscaping, layout, and scale are reserved for subsequent determination.
- 3.4. The proposals are set out on the following plans:

The Scheme

- Site Location Plan No. 052403-DAN-LOC01
- Proposed Site Access General Arrangement Plan No. 147.0017.0001 Rev P07
- Refuse Vehicle and Fire Appliance Tracking – Proposed Site Access Drawing No. 147.0017.0006 Rev P02
- Emergency Access Plan No. 147.0017.0009 Rev P01

Supporting Plans

- Illustrative Masterplan No. 052403-DAN-MP01
 - Indicative Land Use Plan No. 052403-DAN-ILUP
 - Topographical Survey No. 052403-DAN-TOPO1
 - Illustrative Parking Plan and Accommodation Schedule (Drawing Ref 052403-DAN-IPP)
- 3.5. The Plans listed under 'The Scheme', above, comprise the plans which are submitted for approval via this Appeal. The other 'Supporting Plans' are submitted for illustrative purposes only/ background information but can be subject to a condition requiring the reserved matters scheme to be in general conformity with these plans.

Masterplan Approach

- 3.6. Preparation of the Illustrative Masterplan was informed by a number of technical studies (as summarised in Section 4 of the Planning Statement) alongside consideration of relevant planning policy requirements. The Masterplan approach, including in relation to design, is underpinned by a thorough contextual appraisal of the site and its surroundings. Full details are set out in the Design and Access Statement. Submitted with the Application.
- 3.7. The Masterplan vision is to create a high-quality and considered development, that responds appropriately to the constraints and opportunities of the Appeal Site and its surrounding context and provides a range of dwelling sizes to meet different occupiers' needs. These will be set within a hierarchy of streets, with green open space and natural surveillance. The houses will be designed to respect and reflect the character of the area, so that the development has a bespoke design which is in keeping with the established local character.
- 3.8. The vision is to be achieved through the following design principles included in the Masterplan design:
- Delivering a scheme which embodies the characteristics of the area.
 - Making optimum use of the land for the delivery of new homes, with development form and density appropriate to the location.
 - Delivering a development with a range of house sizes, types, and tenures in response to local need.
 - Conserving and enhancing the landscape, ecology, and natural resources around the site with green corridors and linkages.
 - Respecting the amenity and setting of neighbouring residential development.
 - Maximising the linkages between the site and surrounding area and provide opportunities for walking and cycling.
 - Developing an inclusive, safe, and secure residential environment.
 - Providing adequate on-site arrangements for vehicular access, servicing, and parking, including the emergency services and statutory authorities.

3.9. The Design & Access Statement also sets out the following key landscape principles upon which the Masterplan is based:

- Retention of the existing landscape framework of hedgerow and tree lined field boundaries, ensuring the proposals are well integrated into the existing landscape.
- Setting development back from Reading Road to retain and respect the character of the area.
- Proposed building heights to be between two and two-and-a-half storeys, reflecting the surrounding context.
- Creation of recreation opportunities within the Site proposals, including a generous areas of public open space (including equipped play area)
- Provision of street trees throughout the new development, to break up the housing and assist in filtering views.

3.10. The principal elements of the Appeal Scheme are summarised as follows:

- The scheme provides for up to 111 dwellings, to include an appropriate mix of house types, within a landscaped setting.
- The scheme will include a mix of housing tenures, with 40% affordable housing.
- Varied building heights, predominantly 2 storeys, but adjacent forms of development indicate that up to 2.5 storeys is in-keeping with the vernacular of the surrounding area.
- Vehicular and pedestrian access from Reading Road.
- On-site provision of public open space.
- Landscaping, including enhancement at the eastern and western ends of the Appeal Site to retain the character of the area.
- SUDS/drainage features.
- Associated biodiversity enhancements.
- Energy efficiency measures and electric vehicle charging points can be secured by condition.

3.11. The component parts of the scheme as summarised are below.

Access and Layout

- 3.12. Illustrative Masterplan No. 052403-DAN-MP01 shows one way in which the proposed residential development could be laid out on the Site. The location of the vehicular access point onto Reading Road is the only suitable access point for the Site. The determination of this access point has been informed by a speed survey to inform required visibility splays, topographical and arboricultural surveys.
- 3.13. The principle of a simple bell mouth junction design, developed in line with DMRB standards and with the appropriate forward visibility, is proposed as the means of vehicular access, and main pedestrian access, to the site. This junction can accommodate the predicted development traffic that would be generated by the development. Additional pedestrian links to the existing bus stops on Reading Road are also proposed to ensure safe access for existing and future residents.
- 3.14. The carriageway width of 6m (increased from 5.5m during the determination period) will accommodate vehicular access into the Site with footpath connections proposed to link into the wider footpath network along the western and southern site boundaries.

Land Uses

- 3.15. The technical assessments that have been undertaken in relation to the Site are intended to support a scale of development for up to 111 dwellings, together with a means of access from Reading Road.
- 3.16. Analysis of the Site's topography, flood risk, drainage, arboricultural and ecological requirements has informed the proposed siting of two large areas of open space at the eastern and western ends of the Site. The siting of the dwellings (for future consideration) will be influenced by the location of existing development (outside of the Site boundaries), position of existing trees and their associated Root Protection Areas (RPAs), as well as general good design principles.

- 3.17. The Illustrative Masterplan accommodates a range of dwelling types and sizes, laid out in distinctive groupings to create visual interest and a sense of place, with detached dwellings addressing the site entrance and providing natural surveillance over the areas of public open space, with higher density runs of terraced dwellings contained within the centre of the development. The layout as drafted would create movement and variety within the future development. Consideration has been given to accommodating the requisite parking provision and garden amenity areas, as well as landscaped boundaries, public space, and children's play area.

Table 1: Proposed Land Uses

Land use	Ha	Approx No. Dwellings
Residential (C3 use)	Approx 2.8ha	Up to 111 dwellings
Associated infrastructure (roads/SuDS/Attenuation)	Approx. 1.4ha	N/A
Open Space <i>Includes local open space, amenity areas, semi-natural greenspace and landscape buffers, ecology enhancements</i>	Approx. 2.2ha	N/A
Total	6.4ha	Up to 111

Housing Mix and Affordable Housing

- 3.18. The Scheme proposes 40% affordable housing (which equates to 44 dwellings based on a 111-dwelling scheme).
- 3.19. The remaining (up to) 67 market dwellings will comprise a range of 1 – 4-bedroom houses, with the precise mix to be agreed at the reserved matters stage.
- 3.20. The development will allow for a mix of housing sizes, types, and tenures, to meet the local needs identified in the most recent evidence base. This could include a mixture of family housing and smaller starter homes.

3.21. The affordable housing provision meets the current policy requirement of 40% on greenfield sites of 5+ dwellings as set out in Core Strategy Policy CP5 and seeks to address the acute affordable housing need within the Borough. In accordance with the approach set out in Managing Development Delivery Local Plan Policy TB05 and the Council's Affordable Housing Supplementary Planning Document, the affordable housing component of the scheme (44 dwellings; 40%) is expected to comprise the following mix, which can be agreed and secured through the s106 agreement:

- 8 x 1-bed dwellings
- 21 x 2-bed dwellings
- 9 x 3-bed dwellings
- 6 x 4-bed dwellings

Density

3.22. With a gross site area of 6.44ha, the gross density is 17.3dph. This density will ensure the new dwellings integrate with, and complement the local area in terms of scale, massing and layout, whilst sympathetically responding to the Appeal Site's edge of settlement location (and the lower densities along Church Lane, Arborfield) whilst making efficient use of this sustainably located land parcel.

Landscaping Strategy

3.23. Although landscaping is a reserved matter, the Illustrative Masterplan submitted with the Application provides an overview of the landscape principles to be applied at reserved matters stage. These include:

- Retention of the existing landscape framework,
- Residential landscaping,
- Incorporation of SuDs features, and
- Public open space and recreational routes.

-
- 3.24. It is envisaged that the public spaces will be managed and maintained through the establishment of a Management Company, whilst the residential landscaping will be the responsibility of each plot owner.

4. Decision Making Framework - The Development Plan and Other Material Considerations

General

- 4.1. Whilst the detailed policy position will be set out in evidence, this section summarises relevant planning policy and other material considerations, against which the acceptability of the Appeal Scheme falls to be determined. As such, this section of the Statement of Case sets out the overarching decision making framework, before going on in Section 5 to set out the Appellant's assessment of the main issues for determination in this Appeal.
- 4.2. Section 38(6) of the Planning and Compulsory Purchase Act 2004 sets out the legal requirement that planning applications be determined in accordance with the Development Plan unless material considerations indicate otherwise. This represents the S.38(6) 'balance'.

The Development Plan

Overview

- 4.3. The Development Plan comprises:
- Saved Policy NRM6 of the South East Plan,
 - the Core Strategy ("CS") - adopted in 2010, prior to the first introduction of the NPPF in 2012. The CS sets out the spatial strategy for the period up to 2026.
 - the Managing Development Delivery Local Plan ("MDD") -adopted 2014. The MDD sets out detailed policies for delivery of the CS's 2010 spatial strategy.
 - -the Arborfield and Barkham Neighbourhood Plan (made April 2020) which is based upon the 2010 CS and does not cater for a housing need greater than that planned for in the CS.
- 4.4. The Development Plan policies applicable to the determination of the Appeal

are listed below, with those which are 'most important' (for the purposes of paragraph 11(d), to which we return later) highlighted in bold.

Saved Policies of the South East Plan

- NRM6 – Thames Basin Heaths Special Protection Area

Core Strategy

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

Managing Development Delivery DPD

- CC01 – Presumption in Favour of Sustainable Development
- **CC02 – Development Limits**
- CC03 – Green Infrastructure, Trees, and Landscaping
- CC04 – Sustainable Design and Construction
- CC05 – Renewable Energy and Decentralised Energy Networks
- CC06 – Noise
- CC07 – Parking
- CC09 – Development and Flood Risk
- CC10 – Sustainable Drainage
- TB05 – Housing Mix
- TB07 – Internal Space Standards
- TB08 – Open Space, Sport, and Recreational Facilities Standards

-
- TB12 – Employment Skills Plan
 - TB21 – Landscape Character
 - TB23 – Biodiversity and Development
 - TB24 – Designated Heritage Assets
 - TB25 – Archaeology

Arborfield and Barkham Neighbourhood Plan

- IRS1 – Preservation of Separation of Settlements.
- IRS2 – Recognise, Respect and Preserve Identity and Rural Setting of Settlements.
- **AD1 – New Development within Development Limits.**
- AD3 – High Quality Development with Generous Open Space, Properly Landscaped
- AD4 – Address Local Flood Risk Management

Development Plan Status

- 4.5. The CS made provision for at least 13,230 dwellings in the period 2006 to 2026 as set out in Policy CP17. Notably, this level of delivery was based on the historic South East Plan targets and a backlog arising from the older Structure Plan which persisted at the point of adoption (as per para 4.77 CS). The development limits and settlement boundaries in the Development Plan flow from that spatial strategy and the assessment of housing need at that time.
- 4.6. In summary, the Appellant's position is that the Development Plan is out of date in relation to housing requirements and provision set out in CS Policy CP17.
- 4.7. The CS, MDD and ABNHP do not seek to identify or meet the full objectively assessed needs for market housing using a NPPF compliant assessment (derived via the standard method). Nor do they identify or meet objectively assessed needs for affordable housing. The content of the spatial strategy pre-dates the publication of the NPPF. Accordingly, that collection of policies is in conflict with the NPPF requirement (paragraph 61) to significantly boost the supply of housing.

- 4.8. On that basis, Policy CP17 is out of date, and so too are the associated settlement boundaries and 'Development Limits' set out the Development Plan documents which deliver on the CS vision.
- 4.9. There is an inability to meet identified needs within existing settlement limits. As such, only **limited** weight can be given to the conflict between the Appeal Scheme and the settlement boundaries defined by Policies CP9, CP11, CC02 and AD1. In all other respects, the Application Scheme is considered to be compliant with the development management policies within the suite of Development Plan documents, other than the minor loss of good quality agricultural land (0.7ha) which attracts **very limited** weight, and the change in landscape character which attracts **moderate** weight..
- 4.10. Furthermore, The Council accepts they are unable to demonstrate an adequate supply of deliverable housing land, and that there remains an acute need for affordable housing. Their latest position statement (30 January 2025) concluded that there is a deliverable **housing land supply of only 1.7 years**.
- 4.11. The five-year requirement including 5% buffer was 7,014 dwellings against which the Council could demonstrate a supply of 2,321 dwellings. This equates to a **shortfall of 4,693 homes**.
- 4.12. Those calculations pre-date the latest median workplace affordability ratios (updated 24th March) and dwelling stock data (updated 22nd May). Accordingly, the housing land supply calculations shall be updated in evidence and agreed in the Housing Land Supply Statement of Common Ground. The Neighbourhood Plan was made more than five years ago so does not alter the tilted balance in terms of the operation of paragraph 14 NPPF.
- 4.13. On that basis, the weight to be attached to the conflict with Policies CP9 and CP11 of the CS, CC02 of the MDD and AD1 of the NHP, (which relate to the Site's location beyond defined settlement limits at Arborfield Cross) is reduced due to the operation of paragraph 11(d) NPPF.

-
- 4.14. As identified in the evidence base for the Local Plan Update, the Council cannot meet its identified development needs by adhering to and applying the settlement boundaries as defined in the current Core Strategy and Site Managing Development Delivery DPD.
- 4.15. This is demonstrably the case given the review of settlement boundaries undertaken through the emerging Local Plan Update process, and the proposal to allocate significant areas of additional land beyond current settlement boundary for housing. It is clear that the current boundaries (defining the settlements) cannot be maintained in their current position if the identified housing need is to be met. This is a material consideration that weighs against the conflict between the Application Site and the out-of-date settlement boundaries defined under Policies CP9, CP11 CC02 and AD1 of the Development Plan.
- 4.16. The emerging Local Plan Update was submitted to the Secretary of State for examination in February 2025 and is not expected to be adopted until 2026 at the earliest. Presently that plan relies upon early delivery of homes in 2027 despite the need for significant infrastructure delivery, which may be unrealistic given the need for submission and determination of planning applications for any proposed allocations.
- 4.17. In April 2025 the Examination Inspector wrote to the Council noting “particular concerns about the delivery of housing”, and sought further information on the timescales for progressing the Loddon Valley Garden Village SDL allocation, given the need for critical/ essential infrastructure to the cost of some £10 million and the indicative costs in the viability study of highway works (£140million), community facilities (£5.3 million), sub-station capacity upgrades (£16.8 million), sports facilities (£15.2 million), and open space (£10.6 million). It is clear that questions remain about the costs of, and expected delivery rates for, the proposed allocations and that these will be subject to rigorous review as part of the Examination in Public process. This could affect timescales for adoption of the emerging Local Plan and also call into question the soundness of the proposed strategy and in particular, the housing trajectory.
- 4.18. In the meantime, for the purposes of this Appeal, the lack of an up-to-date plan

means the presumption in favour of sustainable development (paragraph 11(d) NPPF) is engaged. The policies which are most important for determining the application are out-of-date due to their inconsistency with the NPPF's objective of significantly boosting the supply of housing.

- 4.19. As a result, planning permission should be granted unless there is a "strong reason for refusal" on footnote 7 grounds (which does not arise here, as discussed further below), or "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".
- 4.20. As outlined throughout this Statement of Case, the Appellant's position is that the Scheme delivers a number of significant benefits that clearly outweigh the conflict with the spatial strategy and the other identified harms, including harm to the landscape character and loss of a very small area of good quality agricultural land. The proposal accords with relevant development management policies.
- 4.21. This assessment accords with the conclusions at Appeal Decision APP/X0360/W/24/3340006 (Land west of Trowes Lane and north of Charlton Lane, Swallowfield RG7 1RT) in which 81 dwellings were allowed on appeal in July 2024. As per the inspector at paragraph 53 of the decision:

"I have found that the appeal proposal would conflict with the spatial strategy of the development plan as the site lies outside the settlement limits of Swallowfield and does not constitute development appropriate in a countryside location. Given the lack of housing land supply, application of that strategy needs to be applied in a flexible way to ensure that sufficient land for housing continues to come forward. However, even if the settlement limits around Swallowfield are applied flexibly to allow development on the edge of it, the scale of the proposed development is such as to conflict with the strategy for development in settlements of the size of Swallowfield. I give that conflict moderate weight."

- 4.22. Since that time, the housing supply position has significantly worsened (now at 1.7 years). As such, the conflict with these policies is now rightly afforded only **limited** weight in the planning balance.

Other Material Considerations

- 4.23. Other material considerations relevant to the determination of this Appeal are as follows:

- NPPF and associated PPG.
- Identified Housing Needs and 5 Year Housing Land Supply Position.
- Affordable Housing Needs.
- Wokingham Borough Council Local Plan Update.
- Recent LPA and appeal decisions relating to development proposals in Wokingham Borough Council's administrative area:
 - Application Ref 232490 – Land off Langley Common Road, Arborfield (scheme of up to 50 dwellings) (recommended for approval, and committee resolution to grant, November 2024).
 - Application Ref 250735 – Land to the north of School Road, Arborfield (scheme of up to 70 dwellings) (recommended for approval, and committee resolution to grant – July 2025).
 - Application Ref 250733 (Land at Ducks Nest Eversley Road Arborfield)
 - Appeal Ref APP/X0360/W/24/3340006 -Land west of Trowes Lane and north of Charlton Lane, Swallowfield RG7 1RT (appeal allowed for up to 81 dwellings)
 - Appeal Ref APP/X0360/W/24/3354667 Land adjacent to Blagrove Lane, Wokingham RG41 4AX (appeal allowed for up to 350 dwellings plus C2 care home)
- Other appeal decisions relating to mitigation of impacts on SPAs:
 - APP/A1910/W/23/3333545 - Rectory Farm, Kings Langley, Hertfordshire, Dacorum, WD4 8HG (decided May 2024)
- Borough Design Guide SPD and other SPD documents.

- 4.24. Set out below is further detail on a number of these material considerations.

National Planning Policy Framework

4.25. The National Planning Policy Framework (NPPF) was most recently updated in December 2024. It is a material consideration of particular standing in the determination of planning applications.

4.26. The content of the NPPF as it relates to the proposed development of the application site is addressed in the order set below:

- The presumption in favour of sustainable development
- Decision making taking
- Delivering a sufficient supply of homes
- Promoting sustainable transport
- Achieving well-designed places
- Meeting the challenge of climate change, flooding, and coastal change
- Conserving and enhancing the natural environment.

4.27. Paragraph 8 of the NPPF identifies that there are three dimensions to sustainable development, comprising (i) economic, (ii) social; and (iii) environmental.

Economic Role

4.28. The economic role requires the planning system to, inter alia, ensure that sufficient land of the right type is available in the right places and at the right time to support growth. This is achieved with the Appeal Scheme on the basis that it is located within a sustainable location, within walking and cycle distance of local services and facilities. The scheme also provides for housing development of the type and mix required to meet identified needs.

4.29. The scheme further addresses the economic role in terms of increased LPA Revenues, Construction impacts (increased GVA, jobs etc.) and increased expenditure in local area.

Social Role

- 4.30. The social role requires the planning system to provide the supply of housing required, creating a high-quality built environment, accessible to local services and reflecting the community's needs. All of these requirements can be achieved with the Appeal Scheme.

Environmental Role

- 4.31. The environmental role requires the planning system to protect and enhance the natural, built, and historic environment. This can be achieved with the proposal in a location that will not result in any significant adverse effects upon the character of the surrounding area, including in landscape terms and lead to enhancements to both the natural and historic environment.

Decision Taking

- 4.32. Section 4 of the NPPF sets out the approach to decision-taking. Paragraph 39 makes it clear that decision-makers at every level should seek to approve applications for sustainable development where possible.
- 4.33. The Appeal Site is located in a sustainable location and will improve the economic and social conditions of the area. It will also help to provide recreational open space and new biodiversity habitats.
- 4.34. Paragraph 49 refers to the weight to be given to relevant policies in emerging plans according to the stage of preparation and the extent to which there are unresolved objections. In the context of Wokingham Borough, the emerging Local Plan has been submitted for examination, but the examination hearings have not yet begun; as such, it is afforded limited weight.

Delivering a Sufficient Supply of Homes

- 4.35. Paragraph 61 sets out the Government's objective of significantly boosting the supply of homes.

-
- 4.36. Paragraph 62 sets out the approach to determining the minimum number of homes needed, which should be informed by a local housing need assessment conducted using the standard method in national planning guidance as a starting point, with alternative approaches only being justified in exceptional circumstances. It also adds that any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.
- 4.37. Paragraph 72 sets out the need to provide a five-year supply of deliverable sites for housing. It also requires sites or broad locations for growth for years 6-10 and beyond.
- 4.38. The Appeal Scheme proposes for up to 111 dwellings which would make a material contribution towards the substantial shortfall in supply. In the circumstances of this case, it represents a material consideration of substantial weight in support of the Appeal Scheme.
- 4.39. The Appellant's will work with the Council in seeking to agree Housing Land Supply Statement of Common Ground, based upon the most up to date information.

Promoting Sustainable Transport

- 4.40. Section 9 sets out the approach to providing for sustainable growth.
- 4.41. Paragraph 110 states the following:

"The planning system should actively manage patterns of growth in support of these objectives. 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."

- 4.42. The Appeal Site is located in a sustainable location adjacent to a smaller settlement but with walkable access to the services and facilities of Arborfield

Cross, and with regular bus service to larger settlements (Reading and Wokingham). The feedback from the Highway Authority demonstrates the acceptability of the Appeal Scheme in sustainability terms. Accordingly, the Scheme is consistent with section 9 and paragraph 110 of the NPPF.

Achieving Well-Designed Places

- 4.43. Section 12 sets out the approach to achieving well-designed places.
- 4.44. Paragraph 131 states that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. It is added that good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.
- 4.45. Paragraph 136 adds that trees make an important contribution to the character and quality of urban environments, with planning policies and decisions to ensure opportunities are taken to incorporate trees within developments. The outline scheme incorporates a number of trees.
- 4.46. The Design and Access Statement and Landscape Appraisal submitted with the Application detail the overall design response. Further detail can be secured at the reserved matters stage.

Meeting the Challenge of Climate Change, Flooding and Coastal Change

- 4.47. Section 14 sets out the approach to supporting the move towards a low carbon future as well as the approach to the management of development and flood risk.
- 4.48. These requirements were addressed in the Energy and Sustainability Statement and the Flood Risk Assessment and Drainage Strategy submitted with the Application.

Natural Environment

- 4.49. Section 15 sets out the approach to conserving and enhancing the natural environment.
- 4.50. Paragraph 187 states that planning policies and decision should contribute to and enhance the natural and local environment including by inter alia, protecting and enhancing valued landscapes in a manner commensurate with their statutory status of identified quality in the development plan.
- 4.51. Paragraph 193 sets out the approach to avoiding significant harm to biodiversity when determining planning applications.
- 4.52. The Appeal Site is not a valued landscape, and the Scheme delivers a net gain in biodiversity.

Historic Environment

- 4.53. Section 16 sets out the approach to conserving and enhancing the historic environment. The Council's Built Heritage team confirmed in their response that there are no built heritage assets within the Site and in terms of those beyond the Site itself, they are of sufficient distance (coupled with the intervening trees and buildings) that there would be no detrimental impact to the setting of these.

Identified Local Housing Need and 5 Year Housing Land Supply Position

- 4.54. As set out in the officer's Report, the Council accepts that they cannot demonstrate the necessary five-year supply of housing land; and in their estimation, can demonstrate just 1.7 years' supply.
- 4.55. In the Housing Land Supply Statement of Common Ground for the Blagrove Lane Appeal, dated 05.02.25, the Council set out that the standard method requirement for Wokingham, following introduction of revisions to the NPPF in December 2024, is 1,336 dwellings per annum, equating to 6,680 dwellings over the five year period. As per the requirements of NPPF, paragraph 78a, a

5% buffer is added, which increases the requirement to 7,014 dwellings. The supply over the period 1 April 2024 to 31 March 2029 was 2,321 dwellings, giving 1.7 years' supply.

- 4.56. The Government has since published revised information on the median workplace affordability ratios (24 March 2025) and dwelling stock (22 May 2025) which impact the calculation, This will be addressed in evidence. The Appellant also reserves the right to review their five-year housing land supply case on account of the publication of any more recent information or additional analysis of the sources of supply, should that materialise prior to the inquiry.
- 4.57. The Joint Arborfield and Barkham Neighbourhood Plan was made of 22nd April 2020. Since the fifth anniversary of its adoption occurred on 22nd April 2025, this means paragraph 14 of the NPPF does not apply, (and it is further noted that that plan contains no site allocations).
- 4.58. As confirmed in case law (see *Hallam Land Management Ltd v Secretary of State* [2018] EWCA Civ 1808), the extent of the shortfall is relevant to the weight that can be given to out-of-date policies, as well as to the benefits of housing delivery. In addition, Paragraph 232 of the NPPF requires that the weight to be given to policies according to their degree of consistency with the Framework – with more weight given to policies which are consistent with the NPPF's objectives and goals. Accordingly, the extent of the shortfall is substantially material to assessing the merits of housing delivery from the Appeal Scheme.
- 4.59. The Appellant will liaise with the Council with a view to preparing a separate statement of common ground on housing land supply. This will include matters in relation to the five-year requirement and the deliverability or otherwise of the identified components of supply, hopefully narrowing the issues between the parties on this issue and saving time and resources at the inquiry.
- 4.60. The Council's inability to demonstrate five-year supply of housing land supply engages the presumption in favour of sustainable development pursuant to NPPF paragraph 11d.

-
- 4.61. Given the Appeal Site is predominantly greenfield land, the ability to deliver quickly and thus contribute towards the 5-year housing land supply shortfall is considered to represent a substantial benefit of the proposal.
- 4.62. The delivery of market housing from the Appeal Scheme, in a sustainable location is a material consideration of **substantial weight** in favour of the grant of planning permission.

Affordable Housing Needs

- 4.63. The Appeal Scheme proposes the on-site provision of up to 44 affordable dwellings, which amounts 40% of the total number of dwellings to be provided., which is compliant with Development Plan policy CP5.
- 4.64. The Affordable Housing SOCG agreed between the Council and another applicant in the Blagrove Lane appeal (dated 27 February 2025) makes clear that a number of matters related to affordable housing need were not agreed between the parties. The appellant therefore sets out below their position on the extent of affordable housing need in Wokingham, and Arborfield specifically. This detail is provided up front in this Statement of Case to allow for early discussions with the Council in order to agree the terms of an Affordable Housing SoCG.
- 4.65. The provision of affordable housing is a key part of the planning system. A community's need for affordable housing was first enshrined as a material consideration in PPG3 in 1992 and has continued to play an important role in subsequent national planning policy, including the National Planning Policy Framework (2012, 2018, 2019, 2021, 2023 and 2024 versions).
- 4.66. The NPPF is a material planning consideration. It is important in setting out the role of affordable housing in the planning and decision-making process.
- 4.67. The NPPF sets a strong emphasis on the delivery of sustainable development, including affordable homes, at paragraphs 20 and 63.

-
- 4.68. Paragraph 61 clearly sets out the Government's aim to "boost significantly the supply of homes" while throughout the NPPF the importance of affordable housing is highlighted (paragraphs 11dii, 63, 64, 65, 66, 67, 71, 76, 82, 154f, 156 and 157).
- 4.69. The need for affordable housing and importance is emphasised in many Government publications, including:
- Building the Homes We Need ministerial statement by the Deputy Prime Minister on 30th July 2024.
 - Written Ministerial Statement made by the Minister of State for Housing and Planning on 12 December 2024 (Publication of new NPPF).
 - Statements by the Chancellor associated with the publication of the National Infrastructure Strategy (19th June 2025)
- 4.70. The Berkshire and South Bucks SHMA (February 2016), prepared jointly by the Council and the other Authorities in Berkshire, provides an assessment of the Borough's affordable housing needs. This indicated an annual net need (2013-36) for 441 affordable dwellings (Table 81) and can be compared with the overall assessed need for 856 homes annually (Table 139). Seeking 441 affordable homes annually therefore represented 51.6% of the total housing need for the Authority over the period 2013 to 2036. This contrasts with a requirement for a minimum of between 20% and 40% (and up to 50%) in Core Strategy Policy CP5. Since the Appeal Site lies outside of a defined development limit and is not within the boundaries of a Strategic Development Location, 40% affordable is required.
- 4.71. Since the publication of the SHMA, the Authority has undertaken a further appraisal of affordable housing need. This is in the Local Housing Need Assessment 2019 (January 2020). A further updated assessment was issued in November 2023. These provide revised appraisals of affordable housing need alongside the calculation of the overall Local Housing Need figure derived from the then current version of the PPG (ID ref 2a-004-20190220).
- 4.72. The January 2020 Report indicates that over the then envisaged emerging Local Plan period for 2018-36, an annual average of 407 affordable homes

would be required (paragraph 7.68), which was 51% of then minimum Local Housing Need figure of 798dpa¹.

4.73. The subsequent November 2023 Report indicates that over a Plan period from 2021 through to 2040, there was an overall affordable housing need for 6,689 dwellings (figure 39), which equates to 352 dwellings annually. Although the November 2023 report is the most recent assessment of affordable need, this includes allowance for first homes as part of the overall supply of affordable housing. Whilst this formed part of the portfolio of affordable tenures within the versions of the NPPF issued in 2023, it does not appear in the December 2024 version. As the appeal will be determined against the current Government guidance (consistent with NPPF paragraph 231), no further consideration will be made of the November 2023 analysis.

4.74. As indicated in the table below², the Council has delivered 2,663 affordable homes in the period April 2013 to March 2024. This is equivalent to an annual average rate of 242.1 affordable dwellings since 2013. This compares to the original annual requirement of 441 affordable homes and the subsequent 407 affordable homes as detailed in the 2020 Appraisal of Affordable Housing Need. It is therefore clear the development plan and the Council is significantly behind in terms of delivering the required amount of affordable housing.

Net delivery of affordable homes in Wokingham Borough 2013-2024			
Year	Net housing completions	SHMA (Feb 2016)	LHN Rpt (Jan 2020)

¹ See paragraph 14 of Executive Summary (page 9).

²Sourced from Table 1011C at of the Government's "live tables on affordable housing supply".

	All ³	Affordable ⁴	%	Affordable need	Difference	Affordable need	Difference
2013/14	488	108	22	441	-333		
2014/15	454	95	21	441	-346		
2015/16	675	123	18	441	-318		
2016/17	967	212	22	441	-229		
2017/18	1,528	482	32	441	41		
2018/19	1,284	365	28	441	-76	407	-42
2019/20	1,555	465	30	441	24	407	58
2020/21	1,206	187	16	441	-254	407	-220
2021/22	1,440	189	13	441	-252	407	-218
2022/23	865	121	14	441	-320	407	-286
2023/24	841	316	38	441	-125	407	-91
Total	11,303	2,663	24	4,851	-2,188	2,442	- 799

4.75. Alternatively, since April 2018 (the start of the period appraised in the Local Housing Need Assessment (Jan 2020)), there have been 1,643 affordable homes completed, which is nearly 800 dwellings less than that required to address its appraisal of affordable housing need (407dpa).

4.76. The delivery of affordable housing whilst reaching a peak of 38% in 2023/24, nevertheless has averaged only 24% from 2013 through to 2024. The delivery has consistently been significantly below the 52% envisaged in the SHMA, the 51% of the Local Housing Need figure appraised in the January 2020 report or up to 50% through the Core Strategy policy.

4.77. As the Table indicates, the delivery of 2,663 affordable dwellings since April 2013 should be viewed in the context that this represents an under provision of 2,188 dwellings as assessed by the SHMA to achieve the annual requirement of 441 affordable units. Whilst the extent of shortfall against Local Housing

³ Source: appendix 14 of the Council's Housing Land Supply Statement for 2024-2029.

⁴ Source: Table 1011C of the Government Live Tables on Affordable Housing Starts and Completions by local authority.

Need figure from 2018 is less with a deficit of 799 dwellings, this is nearly double its assessed annual need of 407 affordable dwellings.

- 4.78. Alongside the acknowledged shortfall in housing supply, the Council does not have any evidence which demonstrates that the worsening position, with respect to affordable housing delivery, will also be addressed.
- 4.79. It is therefore evident that there is an ongoing shortfall in affordable housing delivery and that this is likely to worsen in the short term. With the expected delays in the preparation of the new Local Plan, it is not considered that the Borough's substantial need for affordable housing is likely to be resolved in the short to medium term.
- 4.80. Alongside the very poor performance in addressing affordable housing need, it is also necessary to consider changes in the Council's Housing Register over the period since the base date of the SHMA. This further reinforces the significant unmet need for affordable homes in the Borough as indicated in the Table below.

Comparison of Housing Register Changes in Wokingham Borough⁵
--

⁵ Data obtained from the Government – local authority housing data.

	1/4/13	1/4/14	1/4/15	1/4/16	1/4/17	1/4/18	1/4/19	1/4/20	1/4/21	1/4/22	1/4/23	1/4/24 ⁶
Number on housing register	2,274	2,417	1,622	1,527	1,702	1,613	1,498	1,510	2,086	2,592	2,420	1,342
Those in a reasonable preference category	1,000	1,000	900	405	425	334	77	103	255	634	221	224
Homeless	20	20	27	65	44	20	33	45	46	43	49	80

4.81. The above table indicates the changes since 2013. This confirms that there is a significant need which continues to grow and has not been addressed by the level of affordable housing provision in the Borough. The preceding table also confirms that insufficient new affordable homes have been completed in the Borough to off-set the increased demand for such properties which has resulted in the size of the register remaining broadly constant. Therefore, to make an effective contribution towards addressing the requirements of households as indicated on the Borough's housing register, it is essential that further affordable homes are delivered, as envisaged on the appeal Site. Whilst the above table indicates that the number on the register was lower in 2024 compared to the earlier years, this will have been influenced by a tightening of the criteria for inclusion on the register to include both a residency and local connection test (whereas previously it was just a residency test).

Affordable Housing Need in Arborfield

4.82. The appellant's agent has submitted a number of Freedom of Information Act requests to the Council regarding the level of request for affordable housing in Arborfield. These are shown below.

Date of Fol response	Affordable Housing preferences for Arborfield
9 th October 2019	615

⁶ Housing Register waiting list criteria tightened. It now includes criteria of a local connection, alongside a residency test.

4 th February 2025	669 ⁷
-------------------------------	------------------

- 4.83. The table above indicates that there are 669 requests for an affordable home in Arborfield. This compares to the 1,204 households on the borough wide register at the same date of 4th February 2025. This is therefore 55% of those on the register.
- 4.84. This indicates that there is significant unmet and growing demand for affordable housing in Arborfield & Newland parish.
- 4.85. This significant unmet demand can be compared with that which could be expected in the Parish. The results of the 2021 Census⁸ indicates that within the Borough, there were 177,502 people in 69,164 households. For Arborfield & Newland Parish, the 2021 Census indicates that there were 3,013 people and 1,124 households. Therefore, Arborfield & Newland Parish contains just 1.7% of the Borough's households as at the 2021 Census.
- 4.86. The results of the housing register as indicated in the Fol responses therefore emphasises that there is very significantly **greater demand** for affordable homes in Arborfield & Newland Parish compared to the Borough as a whole. Had Arborfield & Newland parishes' need for affordable housing replicated its share of households (1.7%) then of the 1,204 households on the register as of 4th February 2025, 20 could have been expected to relate to the parish. Instead, the demand on the current waiting list (at 669) is substantially greater than this. It is acknowledged that the 669 figure includes preferences made elsewhere too, but the undeniable fact is the there is nevertheless a strong preference/demand/need for affordable homes in this part of the Borough, especially given the demand from 669 households is over 33 times what could be expected on a pro-rata basis (the 20 dwellings referenced above).

⁷ This response also indicates the size of property sought (one bedroom – 295, two bedrooms – 145, three bedrooms – 176, four bedrooms – 45 and five bedrooms – 8).

⁸ Population and household estimates, England and Wales: Census 2021 - Office for National Statistics (ons.gov.uk)

- 4.87. Other parts of this Statement of Case reference the accessibility of the Site to the wider parts of the Borough, particularly given its location on the high quality frequent bus service. The quality of the service already available accords with the Council's definition of good public transport⁹ which provides scope for occupants of affordable homes to access the extensive job opportunities along the route, especially in Reading and Wokingham town centres, the Science Park and at Arborfield Green.
- 4.88. The provision of 44 affordable homes on the Appeal site¹⁰ in the right location for affordable needs is a **benefit of substantial weight**, especially as it is over 10.8%¹¹ of the Borough's annual affordable need.

Future affordable housing supply

- 4.89. The future delivery of affordable housing in Wokingham Borough is highly uncertain. In addition to the current shortfall, there is also the question of whether future needs will be met. The risks of not meeting these needs are heightened by the fact that any future housing supply delivered through permitted development conversions is exempt from affordable housing, and on brownfield sites, the affordable housing potential is tempered by vacant building credit and or viability considerations. This has the potential to make the situation even more severe, not just for Wokingham Borough's vulnerable position on affordable housing land supply, but for the significant number of households on the Council's Housing Register on 4th February 2025 (1,204 households as detailed above).
- 4.90. If 24% of the five-year supply is affordable (as per the average shown above), then there is a woeful under supply of affordable homes baked into the Council's past supply compared to what is required. This reinforces the need for larger schemes that have the ability to make material contributions towards affordable housing delivery in contrast to delivery over the past 11 years.

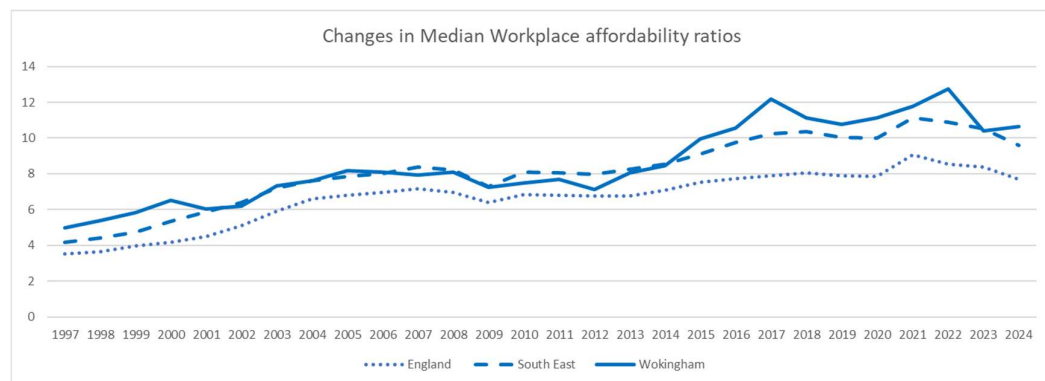
⁹ Core Strategy Paragraph 4.37

¹⁰ Equates to 39.6%

¹¹ 44 of 407

4.91. Paragraph 63 of the NPPF requires that the needs of groups with specific housing requirements are addressed, which includes those requiring affordable housing. Whilst the Council's five-year land supply assessment on 31st March 2024 indicated that affordable homes are expected on a number of the sites listed, there is no information of the total number of such units still to be completed or their expected delivery rate. Therefore, there is no guarantee that existing permissions will provide sufficient homes to address continuing annual need for 407 affordable dwellings (assessed in the Local Housing Need Report (January 2020)) together with the 1,204 households on the Housing Register.

4.92. The failure to meet the identified needs of affordable housing is a dire situation indicating that the Council is not fulfilling the objectives in paragraph 61 of the NPPF. The continued under-delivery of affordable housing has contributed to the worsening of the affordability ratios in the Borough as indicated in the chart below.



Affordability Ratios

4.93. The chart also shows that affordability ratios in Wokingham Borough have more than doubled between 1997 and 2024, and whilst they were below those of the South East region from 2001 to 2014, they are now back above them. This doubling in the affordability ratio has occurred because of a failure to deliver sufficient homes to meet market and affordable need in the Borough. This is illustrated by the extent that the affordability ratio of the Borough has remained above those for England and the Region. Consequently, it is essential that further increases in house building occurs to improve affordability, especially given the continual under-delivery in supply.

- 4.94. A step change in the delivery of affordable housing is therefore required if the Council is to get anywhere near the accepted identified need in the SHMA or the Local Housing Need Assessment and begin to address the dysfunctions of the local housing market. Such a step change would be consistent with the thrust of paragraph 61 of the NPPF, to boost significantly the supply of homes.
- 4.95. Consequently, there can be no doubt that there is an acute need for affordable housing in Wokingham Borough. The evidence set out above emphasises that the provision of affordable housing should be afforded **substantial weight** in the overall planning balance. This proposal includes a level of affordable housing provision at 40%, consistent with that required by policy. This is a significant benefit of the appeal scheme given the ongoing unresolved affordable housing needs as indicated by the Council's housing register. The most recent information on this shows 1,204 households on the register, which is 1.7% of the Borough's households as confirmed in the 2021 Census.
- 4.96. The delivery of 44 affordable homes in a sustainable location where there is significant demand is a material consideration of **substantial weight** in favour of the grant of planning permission.

Wokingham Borough Council Local Plan Update

- 4.97. The Council has submitted a Local Plan Update for examination. As noted at the very start of the Submission Plan (paragraph 1.8), Wokingham is a highly constrained borough:

"The challenge of meeting development needs is greater in Wokingham Borough than many other areas. This is due to the comparatively limited availability of previously developed land that can be reused to meet future needs and the presence of constraints such as the Green Belt, flooding and the emergency planning zone around AWE Burghfield, all of which act to limit the supply of potentially suitable land and choices."

- 4.98. Furthermore, the population grew by 15% between 2011 and 2021 (Source: Submission Plan para 2.4) which is said to be the third highest rate of population increase in the South-East and the one of the highest in England. It is clear that the context has changed significantly from the situated existing when the Core Strategy was adopted in 2010. Paragraph 2.34 therefore, unsurprisingly, identifies that provision of a sufficient supply of land for new homes is a key challenge (and opportunity) of the Local Plan Update.
- 4.99. The proposed new spatial strategy involves the allocation of greenfield land for development, including new SDLs at Loddon Valley Garden Village, South Wokingham and Arborfield Green. The first of these is adjacent to the historic core of Arborfield (to the north of Church Lane) and therefore in close proximity to the Appeal Site. At paragraph 4.49 of the Submission Plan it is noted that that SDL site has capacity for around 3,930 homes, of which 2,700 would be built in the period up to 2040. If adopted, this will cause significant change to the character of the immediate locality including the historic core of Arborfield. Policy SS10 (Meeting our housing needs) makes provision for 12,763 dwellings in the period April 2023 – 31 March 2040, at a rate of 751 dwellings per annum. The plan is being examined under the transitional provisions of the December 2024 NPPF, and hence the proposed rate of delivery is below the current standard method requirement. As such there is likely to be a need for an immediate review immediately upon adoption (NPPF paragraph 236).
- 4.100. As identified above, the Inspector has raised queries about the assumptions underpinning the housing trajectory and around the infrastructure delivery costs of the proposed allocations and the extent to which these have been taken into account in assumptions around delivery timescales.
- 4.101. In the recent Blagrove Lane appeal decision¹² (dated 29 May 2025) the inspector commented (at paragraphs 18 and 19) on the likely timeframes for adoption of the Local Plan Update:

¹² Appeal reference APP/X0360/W/24/3354667 - Land adjacent to Blagrove Lane, Wokingham RG41 4AX

"The Council anticipates the hearing sessions will be complete by the end of 2025 and the emerging plan to be adopted around May 2026, and at this point, the borough's housing land supply position will be above the minimum five years.

However, the EiP is at an early stage, and hearing sessions are yet to take place, and there is no indication of the Examining Inspectors view on the emerging plan."...

"It is a matter for the Examining Inspectors to determine whether the emerging plan is sound or not. Nevertheless, it is not certain that the Council's expectations on timescales will occur, and at best the emerging plan will not be adopted until this time next year. Thus, the current housing land supply position will not change overnight, and it may be that the emerging plan will look to allocate more housing sites in the countryside, and that may well be necessary.

20. For the time being, I consider CS Policies CP9, CP11, CP17 and MDD Policy CC02 frustrate the delivery of housing at the level that is required. They are therefore inconsistent with the Framework's objective to meet an area's identified need. However, that does not mean that those out-of-date policies (not only deemed out of date) carry no or little weight. In my opinion, given the purposes of the policies, they carry moderate weight, and moderate material harm would arise from the proposal's conflict with the spatial strategy."

4.102. The appellant agrees that these policies frustrate delivery of housing at the level that is required, and they are therefore inconsistent with the NPPF. In this case the Appellant considers that **limited weight** should be afforded to the conflict with these policies, as opposed to moderate. This is because the Appeal Site is adjacent to the historic core of Arborfield and benefits from a regular bus service to Wokingham and Reading. As such, the countryside location is not fully reflective of the Site's sustainable access credentials.

4.103. In evidence the Appellant will refer to evidence base documents prepared by the Council in connection with the Local Plan Update, including (but not limited to), the following:

- Housing and Economic Land Availability Reports.
- Affordable Housing Topic Paper.
- LCWIP.
- Landscape Character Assessment.
- Valued Landscapes Assessment.

- Settlement Hierarchy Assessment.

5. The Appellant's Position on the Main Issues for Determination in this Appeal

Main Issues for Determination

- 5.1. The main issues for determination in this appeal are considered to be:
- The principle of development outside defined settlement limits;
 - The quantum and scale of development;
 - Impact on landscape and character;
 - Sustainability of the location;
 - Loss of agricultural land;
 - Flood risk assessment and impact on the main river watercourse;
 - Mitigation of impacts on the Thames Basin Heaths SPA; and
 - Securing planning obligations via a suitable s106 agreement.

The Principle of Development

- 5.2. The Council's position (as set out in reason for refusal 1) is that the principle of development is unacceptable, because the site is greenfield in nature, and is located in the countryside outside the settlement boundary, (and *detached from* recognised settlement limits). These factors, coupled with the proposed scale, renders (in the Council's view) the scheme unacceptable in principle due to conflict with a number of Development Plan policies and other guidance, as follows:

- CS CP1 (Sustainable Development).
- CS CP2 (Inclusive Communities).
- CS CP3 (General Principles for Development).
- CS CP6 (Managing Travel Demand).
- CS CP9 (Scale and Location of Development Proposals).
- CS CP11 (Proposals Outside Development Limits).
- MDD CC01 (Presumption in Favour of Sustainable Development)
- MDD CC02 (Development Limits).
- TB21 (Landscape Character).
- A&BNHP IR1 (assumed to be IRS1 - Preservation of Separation of Settlements).
- A&B NHP IR2 (assumed to be IRS2 – Recognise, Respect and Preserve Identity and Rural Setting of Settlements).
- A&B NHP AD1 (New Development within Development Limits)
- Borough Design Guide SPD
- NPPF sections 2, 4, 8, 9, 12 and 15.

- 5.3. The Council's Policy Officer's response noted that the emerging Local Plan Update proposes allocation of a large strategic development location to the north-west of the Site (Loddon Valley Garden Village, discussed above) but that this emerging plan only carried limited weight presently.
- 5.4. The Appellant will present evidence to address this reason for refusal as follows.
- 5.5. It is widely accepted that the Development Plan's settlement boundaries are out-of-date as they fail to address objectively identified housing needs as required by the NPPF. Policy CP17 of the CS (delivery of housing) is manifestly out of date, being based on historic South East Plan housing targets coupled with backlogs accrued under the Berkshire Structure Plan. The settlement boundaries in the Development Plan (CP9 and CP11) are aligned to the CP17 level of housing provision and as such they are also manifestly out of date. Furthermore, there is only 1.7 years' housing land supply which, as per footnote 8 NPPF, renders the most important policies out of date for the purposes of paragraph 11(d) NPPF. The tilted balance is clearly engaged; a point agreed between the parties.
- 5.6. The Council accepts that the Development Plan settlement limits are out of date, as evidenced in the officer's report for the appeal scheme and also those of other recent schemes recommended for approval in Arborfield:
- Application Ref 232490 – Land off Langley Common Road, Arborfield
 - Application Ref 250735 – Land to the north of School Road, Arborfield.
- 5.7. When recently allowing the appeal at Blagrove Lane (APP/X0360/W/24/3354667) (May 2025) the Inspector noted that Policy CP17 of the Core Strategy sought to deliver on the requirements of the abolished South East Plan (paragraph 9) and that this was prior to first publication of the NPPF in 2012 (paragraph 14). Notably, the NPPF:

"introduced a shift in approach to boost significantly the supply of housing.

Hence, the CS's approach to the delivery of housing did not follow the Framework's method, and it has not been reviewed since it was adopted. Thus, the CS's assessment of development needs does not reflect the current and previous versions of the Framework, which have housing requirement figures of 1,336 dwellings per annum ("dpa") and 748 dpa respectively.

15. Consequently, the housing requirement has now considerably increased compared to CS Policy CP17, and it is inconsistent with the Framework's aim of significantly boosting the supply of housing and meeting an area's identified housing need. By extension MDD Policy CC02 and CS Policies CP9 and CP11 are also inconsistent with the Framework as they limit where development can go based on delivering the housing requirement in CS Policy CP17. Hence, this affects where the housing required to meet a higher level could potentially go.

16. The purposes of CS Policies CP9 and CP11 are to identify appropriate and sustainable areas for development that are well located for facilities and services, to protect the identity of settlements, and maintain the quality of the environment. These purposes are consistent with the aims of the Framework. However, despite recent Housing Delivery Test performances, the Council cannot currently demonstrate a five-year supply of deliverable housing sites. The latest agreed position is a supply of 1.7 years, which has decision-making consequences that I shall come to later, in that the most important policies for determining this application are deemed to be out of date.

17. I note the borough's housing requirement rose due to last December's Framework publication, but even prior to that appeal decisions show a progressively declining supply of deliverable sites (ranging from 4.84 years to 3.2 years pre-December 2024 Framework) against either a four or five year minimum as dictated by the Framework at the time of each decision. I put this down to the development plan coming towards the end of its plan period and delivering on what was a lower housing requirement, albeit one that was not a ceiling. Furthermore, planning permissions have been granted for housing schemes outside of the borough's settlement limits. Hence, the current supply position is not solely down to the national policy change, which has only seen the supply position decline further.

18. I note that the Council has submitted the Wokingham Borough Local Plan Update 2023-2040: Proposed Submission Plan ("emerging plan") for Examination in Public ("EiP"). The Council anticipates the hearing sessions will be complete by the end of 2025 and the emerging plan to be adopted around May 2026, and at this point, the borough's housing land supply

position will be above the minimum five years. However, the EiP is at an early stage, and hearing sessions are yet to take place, and there is no indication of the Examining Inspectors view on the emerging plan."

19. While the appeal site may not be a proposed allocation, I need to consider this appeal on its own merits. It is a matter for the Examining Inspectors to determine whether the emerging plan is sound or not. Nevertheless, it is not certain that the Council's expectations on timescales will occur, and at best the emerging plan will not be adopted until this time next year. Thus, the current housing land supply position will not change overnight, and it may be that the emerging plan will look to allocate more housing sites in the countryside, and that may well be necessary.

20. For the time being, I consider CS Policies CP9, CP11, CP17 and MDD Policy CC02 frustrate the delivery of housing at the level that is required. They are therefore inconsistent with the Framework's objective to meet an area's identified need. However, that does not mean that those out-of-date policies (not only deemed out of date) carry no or little weight. In my opinion, given the purposes of the policies, they carry moderate weight, and moderate material harm would arise from the proposal's conflict with the spatial strategy."

- 5.8. The Appellant's position is that, as per the reasoning above, CP9, CP11, CP17 and MDD Policy CC02 are out of date as they fail to meet objectively identified housing needs. They frustrate delivery of identified housing needs.
- 5.9. Whilst the Site is detached from the 'defined' settlement limit of Arborfield, it is attached to a defined settlement; the historic core of Arborfield. The NHP (which forms part of the Development Plan against which this Appeal is to be assessed) clearly identifies Arborfield (and the collection of houses around Church Lane) as a settlement in its own right. The NHP's view on the identity of settlements should take priority over the out-of-date settlement limits or indeed the evidence being prepared for the Local Plan Update (noting the Settlement Hierarchy 2024 does not identify Arborfield's historic core as a defined settlement in its own right). The Development Plan carries more weight than the emerging, as yet untested, Local Plan Update.
- 5.10. We note that the Council has been content to approve other proposals adjacent to the settlement boundaries of Arborfield Cross and Arborfield Green, but not

this Site because it is detached from a settlement. That is to say, the Council supported speculative applications which abut defined settlement boundary limits, but not a scheme which abuts an existing settlement without a settlement boundary. This shows excessive continued emphasis, by the LPA, on the historic spatial strategy which has already been found to be manifestly out of date.

- 5.11. This Site is adjacent to development, including residential dwellings, on three sides (as noted in the Council's landscape architect's response). It is not a remote countryside location which is divorced from built form. The settlement boundaries are frustrating the delivery of much needed housing (to use the wording of the inspector in the Blagrove Lane appeal).
- 5.12. As recorded at page 29 of the officer's report the LPA's planning department have an 'in principle' objection to development in this location, outside a settlement boundary. The officer's report states (third paragraph on page 29) that the site is in "the wrong location" and "This is an underlying fundamental disbenefit of the scheme that cannot be overcome."
- 5.13. This reference to an inability to overcome the 'poor' location makes clear that the LPA have placed a significant amount of weight on the location beyond the settlement boundary, suggesting that no alternative form of development could have been acceptable on this Site. This is in direct contrast to the inspector's comments in the Blagrove Lane appeal (paragraph 19), that the settlement boundaries are 'frustrating delivery of housing at the level that is required' and that a conflict should be afforded only moderate weight in the planning balance.
- 5.14. There is little analysis in the officer's report of the actual settlement morphology on the ground. At the top of page 9 the officer opines that "there is no cohesive settlement in the locality of the site" and rather that the housing on Church Lane is simply 'low density housing' (but not a settlement). This contradicts the Neighbourhood Plan (which forms part of the Development Plan) analysis set out above.
- 5.15. As the Local Plan Update proposes significant growth at the Loddon Valley Garden Village Strategic Development Location (SDL) (see Settlement

Hierarchy 2024 (page 8) it is possible that this settlement (Arborfield) will see significant growth on its northern side, bringing forward new schools, commercial space and housing in close proximity to the Appeal Site. Page 69 of the Application Planning Statement contains a map showing the Appeal Site location relative to this SDL.

- 5.16. It is clear that the Council accepts a need for new development in the countryside to meet identified housing needs. The Council proposes that a large volume of this need could be met adjacent to the historic core of Arborfield. Whilst as yet untested at examination, this is a material consideration of limited weight.
- 5.17. In conclusion the Appellant affords **limited weight** to the site's location beyond a defined settlement boundary.

Quantum and Scale of Development

- 5.18. Reason for refusal 2 suggests that the proposed quantum of development (up to 111 dwellings) would have a scale, character and density that is out of keeping with the character and appearance of the countryside, resulting in harm to the locality. The Council's position, therefore, is that the Appeal Scheme conflicts with the following Development Plan policies and other material considerations:

- CS CP1 (Sustainable Development).
- CS CP3 (General Principles for Development).
- CS CP9 (Scale and Location of Development Proposals)
- CS CP11 (Proposals Outside Development Limits).
- MDD CC02 (Development Limits).
- MDD CC03 (Green Infrastructure, Trees, and Landscaping).
- MDD TB21 (Landscape Character).
- NHP IR2 (Recognise, Respect and Preserve Identity and Rural Setting of Settlements).
- NHP AD1 (New Development within Development Limits).
- NHP AD3 (High Quality Development with Generous Open Space, Properly Landscaped)
- Borough Design Guide SPD
- NPPF sections 2, 4, 8, 9, 12 and 15

- 5.19. The Council's landscape architect's opinion on the character of the area was

as follows (see consultation response dated 26.02.2025):

“The existing settled character around the site is sparse; to the north and west along Church Lane (a narrow lane with priority traffic), consisting of large dwellings in generous plots set within a pastoral landscape. Along Reading Road is a more recent development of detached modern 2 storey, and 2 storey and single storey dwellings with smaller gardens in Walden Avenue (a cul de sac), perpendicular to Reading Road.”

- 5.20. Thus, whilst she accepted that the area to the north, west and south (Reading Road) of the Site was settled (as opposed to undeveloped, open land), she considered the scale of existing development to be lower density/heights to that proposed.
- 5.21. The Appellant will present evidence to demonstrate that the proposed quantum of development (up to 111no dwellings on this 6.44ha site) equates to 17 dwellings per hectare gross/ 28 dwellings per hectare net.
- 5.22. The Council suggests that prevailing densities on Waldren Ave are 11dph and just 4ph on Church Lane. Given the significant housing land shortfall, a net density lower than 28dph (and indeed at 4 or 11 dph) on the development plots would fail to make efficient use of this land resource.
- 5.23. The Council's own landscape architect accepts that the land to the north, west and south of the Site is settled in character with predominantly 2 storey dwellings. The Appellant's evidence will show that the proposed quantum and building heights are acceptable.
- 5.24. Notably the Council officers recommended¹³ approval for the School Lane proposal approximately 1km east of the Site (and the committee followed this recommendation) despite a density of 22dph (70 dwellings on 3.21 net developable area) which was acknowledged as being higher than the prevailing character of Arborfield Cross, at 18dph (excluding open space/ non-residential areas). Significant weight was given to the harm to the setting of the village (in

¹³ Officers report paragraphs 47 – 49

landscape and character terms) but this (along with other harms such as loss of valued landscape) did not significantly and demonstrably outweigh the benefits of delivery of 70no. homes.

- 5.25. In conclusion, the Appellant's position is that the scale and quantum of development is appropriate on this Site.

Impact on the Landscape and Countryside

- 5.26. The Council's position, as set out in reason for refusal 3, is that the Appeal Scheme would have a "detrimental impact on the landscape and character & appearance of the area by reason of the loss of fields, paddocks and green infrastructure in the countryside and the erection of a large housing development that is out of keeping with the locality." On that basis the Council cites a conflict with the following Development Plan policies and other guidance:

- CS CP1 (Sustainable Development).
- CS CP3 (General Principles for Development).
- CS CP9 (Scale and Location of Development Proposals).
- CS CP11 (Proposals Outside Development Limits).
- MDD CC02 (Development Limits).
- MDD CC03 (Green Infrastructure, Trees, and Landscaping).
- MDD TB21 (Landscape Character).
- NHP IR2 (assumed to be IRS2 - Recognise, Respect and Preserve Identity and Rural Setting of Settlements)
- NHP AD1 (New Development within Development Limits)
- NHP AD3 (High Quality Development with Generous Open Space, Properly Landscaped)
- Design Guide SPD,
- the Wokingham District Landscape Character Assessment
- NPF sections 12 and 15.

- 5.27. The Appellant's position is that the visual sensitivity of the Site is largely obscured from all directions by dense vegetation, hedgerow and built form, with only occasional glimpses of taller elements such as powerlines and rooftops.

Any views of the Site are limited to close distance views and a handful of medium distance views, mainly from the south-east. There are no long-distance views of the Site.

- 5.28. The Appellant will refer to the Council's Valued Landscape Assessment, prepared in connection with the Local Plan Update. That document proposes designation of valued landscapes across the borough but does not include the Appeal Site in this proposal. As such, the Council clearly do not consider the Appeal Site to be a valued landscape for the purposes of paragraph 187 (a) NPPF. Landscape is not, in this case, a footnote 7 matter, and the harm to the landscape attracts **moderate** weight in the planning balance.
- 5.29. As noted above, the Council resolved to approve the School Lane proposal (70no.dwellings at Arborfield Cross) despite not only a higher density (than the surrounding area) but also the site's position within the proposed 'valued landscape' area. Even when placing significant weight on those factors (see paragraph 220 officer's report), these harms did not significantly and demonstrably outweigh the various benefits including 70no. homes. It is also notable that the Council only considered that site to be 'sub-optimal' in landscape terms and still somewhat reliant on the private car (see paragraph 220).
- 5.30. In conclusion the Appellant's position is that the impact on landscape and character attracts moderate weight.

Sustainability of the Location

The Council's Position

- 5.31. Reason for refusal 4 sets out the case officer's view that the Appeal Site is situated in an unsustainable location, by reason of the countryside location outside of defined settlement limits, and also due to the distances to facilities and services and quality of the local walking environment. On that basis the Council's position is that the Appeal Scheme would fail to encourage a modal shift towards sustainable modes of transport, and would therefore conflict with the following Development Plan policies and other material considerations:

-
- CS CP1 (Sustainable Development).
 - CS CP2 (Inclusive Communities).
 - CS CP3 (General Principles for Development).
 - CS CP6 (Managing Travel Demand).
 - CS CP11 (Proposals Outside Development Limits).
 - MDD CC01 (Presumption in Favour of Sustainable Development).
 - MDD CC02 (Development Limits)
 - Borough Design Guide SPD and
 - NPPF sections 8 & 9.

-

- 5.32. By contrast, the Highway Authority confirmed they have no objection to the proposal. As such, the LPA's decision departs from the statutory consultee's response.
- 5.33. In their initial response the Highway Authority sought further information. A response was duly provided along with amended highway access drawings, which were annotated to provide more detail on pedestrian improvements and visibility splays. The Highway Officer then submitted a final consultation response confirming no objection to the proposal. That final response confirms that a) all necessary information was provided by the applicant/ appellant, b) there is access to a good bus service from the site, and c) the various contributions offered (to the Arborfield Bus Strategy/ bus stops and pedestrian routes) would be welcome additions improving the sustainability of the Site to be factored into the planning balance.
- 5.34. There is no suggestion in the Highway Officer's response that the location was considered to be unsustainable in highway terms. Indeed the officer confirmed, during a meeting with the applicant's team that he did not consider the location to be unsustainable, given the above factors. Therefore, the planning department's view departs from the highway officer's (as statutory consultee) response.
- 5.35. Furthermore, the Council resolved to approve 70no. dwellings at School Lane, Arborfield despite finding it to be a 'sub-optimal' location in sustainability terms (see paragraph 220 officer's report) where there would continue to be a degree

of reliance on private cars. In that case, that factor was afforded only moderate weight in the planning balance.

- 5.36. The Appellant's position is that the Appeal Site benefits from regular bus service and is walkable/cyclable to the services and facilities of Arborfield Cross and Arborfield green beyond this. The aforementioned policy requirements are met.

Loss of Agricultural Land

- 5.37. The Council's position is that the Appeal Scheme would result in the loss of Best and Most Versatile ("BMV") agricultural land, due to a small part of the Appeal Site being classified as Grade 3a Agricultural Land. As such, the Council considers that the proposal conflicts with Core Strategy Policy CP1 (Sustainable Development) and section 15 of the NPPF.
- 5.38. An Agricultural Land Classification report submitted during the course of the Application concluded that only 0.7ha of the 6.4ha site (11% of the total area) is Grade 3a land, with the remainder falling within grade 3b/4/non-agricultural (3.6 of the report). As such only 11% of the Appeal Site comprises 'BMV' Agricultural Land. The higher quality land is the triangular portion of land to the west of the Site which is shown on the illustrative masterplan as retained for landscaping/ open space with no built form proposed. This small 0.7ha parcel would not be viable for economically productive agricultural use. Further we note this Site is not presently in use for agricultural (nor has it been in recent history). The loss of BMV at this very limited scale is to be weighed in the planning balance and is to be afforded **very limited** weight.
- 5.39. The Council's position on loss of BMV Land can be seen in two other schemes nearby, both of which were recommended for approval despite the loss of larger areas of BMV.
- 5.40. Application 250735 – Land at School Lane, Arborfield was recommended for approval and the Planning Committee resolved to grant the scheme (subject to s106) on 9 July 2025). That proposal, for up to 70 dwellings, involved the loss of 1.1ha of BMV Land (as compared with 0.7ha in this case). Yet the Council took the view that such loss would only cause minor harm in the overall

planning balance:

“Officer comment: the proposal would result in loss of 1.1 hectare of agricultural land of 3a classification. Whilst this would result in a loss of Best and Most Versatile Land, it is considered that only a relatively small amount of land classified as BMVL would be lost. As such, the resultant harm would be minor, but is considered within the overall planning balance.” (Application 250735 Officer's Report, page 9).

- 5.41. Similarly, the Council's Planning Committee resolved, on 13 November 2024, to approve a scheme of up to 50 dwellings at Land off Langley Common Road, Arborfield (Application Reference 232490). The officer in that case is the same officer who prepared the officer's report for the Appeal Scheme. As noted at paragraphs 36-40 of the officer's report for that scheme, the site comprised Grade 2 and 3a agricultural land and therefore involved the loss of BMV Agricultural Land. A review of the Agricultural Land Survey submitted with the application shows that 25% of that site is Grade 3a BMV (equating to 0.6ha of land).
- 5.42. Whilst noting that Policy CP1 seeks avoidance of the use of BMV, and the NPPF¹⁴ requires recognition of the economic and other benefits of BMV, the officer placed only limited weight on the loss of BMV, stating:

“Aerial photographs show that the site has not been used for arable farmland since at least 1999 and therefore has had no commercial production in at least the last 20 years. This alongside the fact that the site represents a very small proportion of the overall BMV resource within the Borough, only limited weight can be afforded to the economic implications arising from the loss of BMV in this instance. Furthermore, the NPPF (footnote 62) accepts that there are instances where the loss of BMV is necessary, and in this instance, any loss and economic implications must be balanced against the clear need within the NPPF to meet the borough's identified housing needs. These social and economic factors will be weighed in the overall balance.” (paragraph 39 officers

¹⁴ Paragraph 187 of the December 2024 version of the NPPF (although at the time of that report, the relevant reference was paragraph 180 NPPF)

report).

- 5.43. And then, when undertaking the planning balance (and finding overall that the 50 dwelling scheme's benefits would not be significantly and demonstrably outweighed by its harms) he said as follows:

"Economic

121. As with all housing development of this scale in this location, the proposal would result in economic benefits. This is broadly set to arise from the short-term economic contribution of the construction of up to 50 homes via construction industry jobs. In the longer term, future residents of the dwellings will contribute to the viability and vitality of businesses in the village and nearby towns. CIL payments and New Homes Bonus would also be an economic benefit of the proposal. In terms of economic costs, the development would result in the likely loss of a small proportion of the boroughs BMV. On the whole, the size of the development means these benefits are not insignificant and are positively balanced. The development is therefore considered to perform a positive economic role." (para 121 officer's report).

- 5.44. And:

"125. As noted, there are factors that weigh negatively in the planning balance including the overall conflict with the spatial vision of the development plan, the localised landscaping impact which would come about through the effective enlargement of the existing settlement, and the loss of a small area of BMV land. However, it must be recognised that the conflict with the spatial strategy is considered against the context of a housing land supply shortfall. Any economic harm tempered due to the limited agricultural contribution made by this land in the borough." (para 125 officer's report).

- 5.45. A similar conclusion is clearly warranted in respect of the Appeal Scheme. The proposal results in the loss of small 0.7ha parcel of Grade 3a land which has not been used for arable farming at any point in recent history. It represents a very small proportion of the overall BMV resource in the Borough and only very limited weight can be afforded to its loss. Furthermore, the Appeal Scheme delivers more dwellings than either of the two examples above. Overall, the

economic factors of this scheme (with up to 111 dwellings) are, overall, positive. At most, **very limited weight** is attributed to the loss of BMV.

Flood Risk and Impact on Main River Watercourse

5.46. Reason for refusal 6 suggests that insufficient information has been provided to demonstrate that the proposed development will not adversely impact on flood risk or the Main River Watercourse within/adjacent to the Appeal Site. On that basis the Council considers the proposal to be in conflict with the following Development Plan policies:

- CS CP1 (Sustainable Development).
- CS CP3 (General Principles for Development).
- MDD CC10 (Sustainable Drainage).
- NHP AD4; and
- Section 14 NPPF.

5.47. The FRA and Drainage report submitted with the Application identify that the Appeal Site is bisected by a drainage ditch which is classified as a 'Main River.' As such an 8m setback was maintained in the Illustrative Masterplan to allow for ongoing maintenance. There is also a watercourse running adjacent to the southern boundary which is also categorised as a Main River.

5.48. The Council's Drainage Officer made no objection to the proposal in terms of flood risk or drainage.

5.49. The Environment Agency (EA) objected to the proposal on the basis of risk to water quality (rather than flood risk). Further information was submitted following direct liaison with Thames Water to confirm that their business plan for 2025-2030 includes upgrades and extension of capacity to accommodate growth. Thames Water expressly stated that they disagreed with the EA's response to the application, and do not consider the development would contribute to unacceptable levels of water pollution (para 187 NPPF) or adversely affect water quality.

- 5.50. The officer's report, in relation to this reason for refusal, appears to raise concerns about water quality impacts arising from the need to culvert over the drainage ditch along the southern Site boundary in order to upgrade the access into the Site. (Page 24-25 of office's report). An environmental permit would be required for these works, due to the location within 8m of the Main River, and it is expected therefore that the environmental permitting regime would ensure no unacceptable impacts to water quality as a result of these works. The detailed design of the culvert will follow at reserved matters stage when the precise quantum of development and layout is developed.
- 5.51. The Appellant's position therefore is that there is no unacceptable risk to surface water quality, and no conflict with Development plan policy in this regard.

Mitigation of Impacts on Thames Basin Heaths SPA

- 5.52. The Appeal Site is within the 5km Zone of Influence around Thames Basin Heaths SPA. Regulation 63(1) of the Conservation of Habitats and Species Regulations 2017 (as amended) ("the Habitat Regulations") requires a Competent Authority ("CA") to make an Appropriate Assessment ("AA") of the implications of any plan or project potentially affecting a site with regard to the site's conservation objectives. Regulation 63(5) says that the CA may, in light of the conclusions of the AA, agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site.
- 5.53. As the Appeal Scheme is not connected with/ necessary for nature conservation, it is agreed between the parties and Natural England that the proposed population increase on the Appeal Site is likely (in the absence of mitigation) to result in significant effects on the SPA due to recreational disturbance.
- 5.54. The Appellant proposes to secure credits in Council-owned SANG which can be secured either through S106 discussions or through the imposition of a Grampian-style condition.

- 5.55. The Council has adopted a mitigation strategy, which delivered Council-led SANG sites and provides for SAMM measures (management and monitoring) to which non-strategic sites can make a financial contribution. Rooks Nest Wood in Barkham was approved as SANG in 2009 and opened in 2011. The Council's emerging Local Plan evidence base Sept 2024, indicates that as of September 2024 there is some remaining capacity in this SANG. It is also proposed by the Council that Rooks Nest SANG be extended, to accommodate additional development in the emerging Local Plan.
- 5.56. The Council has confirmed they are unwilling to make this SANG available for speculative development. The Appellant's agent sought confirmation from the case officer whether the Council will allow the appellant to utilise the Council's SANG). In their response (6 June 2025 email from Mark Croucher) the Council state "most major application are mitigated by Rooks Nest Wood. However, where this site is outside of the WBC spatial strategy then SANG mitigation would need to be via a third party SANG. The council would not be agreeable to using strategic SANG capacity for sites that are not in accordance with the Development Plan."
- 5.57. In Appeal Decision APP/A1910/W/23/3333545 (Rectory Farm, Kings Langley, Hertfordshire, Dacorum, WD4 8HG), at paragraph 32, the inspector said it would be "the epitome of unreasonableness" for that Council (Dacorum) to refuse to release SANG to the appellant if permission were granted on appeal. The Appellant takes a similar position.
- 5.58. Subject to securing the necessary mitigation, the Appeal Scheme is compliant with Policies NRM6 South East Plan, CS CP8 (Thames Basin Heaths SPA); and CS CP4 (Infrastructure Requirements).

6. Consultation Responses and Public Representations

6.1. A number of internal and external consultees raised no objection to the Appeal Scheme (where appropriate, subject to conditions/ s106 legal agreement):

- WBC Built Heritage Officer
- WBC Drainage
- WBC Highways
- WBC Affordable Housing
- Thames Valley Police
- Berkshire Archaeology
- Royal Berkshire Fire and rescue
- WBC Ecology and Nature Space (requested further information which was duly supplied).

6.2. Those consultees who did object raised issues which form the basis of the reasons for refusal and are therefore addressed in this Statement. This includes comments from WBC Planning Policy, WBC Landscape and Trees, The Environment Agency, and the NHS.

6.3. Public consultation responses are discussed from page 3 of the Officer's Delegated Report, where the local resident concerns/objections are summarised as relating to the following themes and topics:

- Consistency with, and impact on the character of the surrounding area.
- Scale and quantum of development/ density/building heights.
- Loss of open countryside.
- Sustainability of the location/ reliance on private cars.
- Flood risk and surface water drainage.
- Capacity of water treatment plant on Reading Road.
- Utilities (electricity) and water supply.
- Width of pedestrian pavement on Reading Road and lack of complete connectivity to Arborfield Cross.
- Impact on biodiversity, trees and green infrastructure.
- Traffic impacts and pollution.
- Impacts on capacity of local services (doctors, dentists, school).
- Neighbour amenity/ impact on privacy.
- Extent of other development in the area.
- Greenfield nature of the Appeal Site.

- Status of Local Plan Update and speculative nature of the Application; HELAA assessment.
 - Availability of the land (agricultural tie).
- 6.4. The issues raised by interested parties (beyond those raised in the Reasons for Refusal, which are addressed above) have been addressed by the various statutory consultee responses (e.g. County Highways, the LLFA and EA) and/or by the Officer's Delegated Report. In addition, the impact of the Appeal Scheme upon local services and facilities will be mitigated through the package of measures to be secured through the S.106 agreement and through the financial sum to be secured through CIL.
- 6.5. The Appellant will address issues raised by interested parties as necessary in evidence, but do not consider that any of them would constitute reasons for dismissing the Appeal.

7. Planning Obligations and Conditions

Planning Obligations

7.1. The Appellant will negotiate with the Council an appropriate planning obligation mechanism under the provisions of Section 106 of the Town and Country Planning Act 1990 (as amended) to secure developer contributions to address the following:

- Strategic Access Management and Monitoring contribution relating to the Thames Basin Heaths Special Protection Area.
- Training, apprenticeships, and other vocational initiatives to develop local employability skills.
- Affordable Housing provision on the Appeal Site.
- Financial contributions towards sport and recreational facilities.

7.2. A signed and dated Section 106 agreement will address reasons for refusal 7, 8, 9 and 10.

Conditions

7.3. The Appellant will work with the Council to agree a suitable list of conditions in advance of the inquiry.

8. Planning Balance

General

- 8.1. As in all cases, the Appeal must be determined in accordance with the development plan unless material considerations indicate otherwise. However, as set out above, the development plan is out of date in terms of the spatial application of its housing policies. Additionally, the Council is not able to demonstrate a five-year supply of deliverable housing land.
- 8.2. Accordingly, although there is a degree of conflict with the settlement boundaries established under policies CP9, CP11, CC02 and AD1, this can and should rightly only be afforded **limited** weight.
- 8.3. Moreover, the “most important policies” are out-of-date for the purposes of paragraph 11(d) of the NPPF, and as there are no strong reasons for refusal in respect of footnote 7 matters, permission should be granted unless:

“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”¹⁵

The Reasons for Refusal and Impacts of the Proposal

- 8.4. The Council's decision notice states ten reasons for refusal. However, four of these (numbers 7, 8, 9 and 10) are matters that can be resolved via execution of legal agreements to secure various mitigation measures. Accordingly, these reasons can be fully addressed by the Appellant negotiating an agreement or agreements with the Council.
- 8.5. In summary the Appellant's position on the first 6 reasons for refusal is:

¹⁵ The policies referred to are those in paragraphs 66 and 84 of chapter 5; 91 of chapter 7; 110 and 115 of chapter 9; 129 of chapter 11; and 135 and 139 of chapter 12. (NPPF Footnote 9)

-
- Principle of development – it is accepted that the proposal conflicts with the spatial strategy, but this attracts only **limited weight** as Policies CP9, CP11, CC02 and AD1 are manifestly out of date.
 - Quantum of development – the proposed density makes efficient use of the Site and whilst slightly denser than surrounding built form, the Council has accepted that development of the School Lane site at Arborfield Cross could rightly come forward at higher density than the surrounding area, in order to make efficient use of the site.
 - Landscape and Countryside – the Site is not a valued landscape and there are limited and localised views. The change in landscape character is afforded **moderate weight** in the planning balance.
 - Sustainability of the Location – the Site is a sustainable location for development given the regular bus service and walkable/ cyclable access to services and facilities (including primary school) at Arborfield Cross and Arborfield Green (including secondary school).
 - Loss of Agricultural Land – due to the very small quantum of land involved, its lack of agricultural use and low proportion of wider BMV resources, this is afforded **very limited weight**.
 - Flood Risk and Impact on Main River Watercourse – the reason for refusal relates to water quality (as opposed to flood risk) considerations which are suitably controlled via design detail at reserved matters stage and operation of the Environmental Permitting regime.
 - Mitigation of Impacts on Thames Basin Heaths SPA – the applicant is prepared to agree suitable mitigation but its ability to do so to date has been frustrated by the Council's unwillingness to agree to allocate SANG capacity to speculative development. The Appellant anticipates that this matter could rightly and fairly be resolved via the s106 process.

Scheme Benefits

- 8.6. This section considers the Appeal Scheme in the context of the three sustainability tests set out at paragraph 8 of the NPPF.

Economic

- 8.7. The Appeal Scheme satisfies the economic role of sustainability including through the provision of housing to support growth and the associated provision of infrastructure, to be secured through preparation of the S106 agreement and by on-site provision of affordable housing.
- 8.8. The Appeal Scheme generates a series of local and Borough-wide economic benefits including through (i) construction of the scheme and the range of employment generated as a result; and (ii) the on-going expenditure from the households purchasing and occupying the new homes.
- 8.9. The principal economic benefits arising from the scheme are summarised below:
- (i) Increased house building in an area where there is both need and demand for new housing that in turn drives economic growth further and faster than any industry. In this regard the proposals will contribute to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is being made available in the right place and at the right time to support growth.
 - (ii) The economic benefits associated with provision of up to 111 new homes in the Borough where there is an established need for housing given the demonstrable shortfall in the four-year housing land supply position.
 - (iii) The economic benefits associated with delivery of much needed affordable homes (up to 44 dwellings) that will meet the acute need for affordable housing within the Borough.
 - (iv) Meeting general housing needs is a substantial economic benefit, consistent with the Government's objective of significantly boosting the supply of housing.
 - (v) In order for the economy to function, sufficient housing is required in the right locations and at the right time. This Site represents a location where

there would be no significant adverse effect upon the landscape nor on the amenity of neighbouring properties.

- (vi) Based upon a multiplier of 3.4 jobs per new home¹⁶, then up to 111 dwellings are estimated to create approximately 377 new jobs.
- (vii) Increased expenditure in the local area will support local FTE jobs.
- (viii) Helping to deliver a significant boost to the local economy through 'first occupation' expenditure of £839,599.89¹⁷. This is expenditure on new furniture and other household goods that residents spend as 'one-offs' when moving into a new home.
- (ix) In terms of household expenditure, data from the ONS Family Expenditure Survey 2021-22¹⁸ shows that the 'average UK household spend' is £526.10 per week (Table A33) (or £27,357.20 per year), whereas in South East England it is 16.4% higher than the UK average (Table A33). This means average weekly spend per household is £612.40 (or £31,844.80 per annum). For the Appeal proposal, the total gross expenditure is estimated to be around £3.5million per year to the economy. A proportion of this household expenditure is anticipated to be spent in local shops and services and will help sustain the existing services in Wokingham Borough including those local to the Appeal Site. The expenditure per household will include a proportion of that spent on areas including food & non-alcoholic drinks (£70.90 per week); alcoholic drinks (£12.90 per week); recreation and culture (£69.30 per week), household goods and services (£39) and miscellaneous goods and services i.e. hairdressing & beauty treatments (£47 per week).¹⁹ Given the current economic challenges facing the UK these are significant economic benefits.
- (x) Increase in Council Tax receipts annually to the Borough Council
- (xi) Contribution towards Community Infrastructure Levy.

8.10. By providing land of the right type, in the right place, and at the right time to support economic growth, the development of up to 111 dwellings on the Appeal Site fully accords with the objectives at paragraph 8 of the NPPF and

¹⁶ See page 8 of the Homes Builders Federation "Economic Footprint of UK Housebuilding " (Sept 2024) - https://www.hbf.co.uk/documents/13965/The_Economic_Footprint_of_Home_Building_in_England_and_Wales_report_-_September_2024_v.pdf

¹⁷ Research carried out by OnePoll on behalf of Barratt Homes (August 2014; <https://www.barratthomes.co.uk/the-buying-process/home-buying-advice/>) which shows an average of £5,462 per dwelling – Updated at July 2025 via Bank of England Inflation Calculator.

¹⁸ Family spending workbook 3: expenditure by region - Office for National Statistics (ons.gov.uk).

¹⁹ Figures based upon SE Regional data in Table A33

assists in the aims of the NPPF in helping to build a strong and competitive economy.

8.11. This is further emphasised in the Government's November 2011 Paper 'Laying the Foundations: A Housing Strategy for England' where paragraph 11 states *"getting house building moving again is crucial for economic growth – housing has a direct impact on economic output, averaging 3 per cent of GDP in the last decade. For every new home built up to two new jobs are created for a year"*.

8.12. The economic benefits are to be accorded **substantial weight** in the planning balance.

Social

8.13. The Appeal Scheme more than satisfies the social role, in helping to support strong, vibrant, and healthy communities, including through providing the supply of housing required to meet identified needs in open market and affordable sectors. This is a very substantial benefit. In addition:

- 1) Future residents will be in an easy walking, cycling or public transportation distance to local and higher order services and facilities in Arborfield Cross, Arborfield Green, Wokingham and Reading
- 2) The Appeal Scheme will provide a range of housing types and sizes, including up to 111 dwellings to address identified housing needs including 44 affordable dwellings (40%)
- 3) The Appeal Scheme will secure a high quality form of development consistent with the development management policies of the NPPF and the approach to high quality design set out in the NPPF; and
- 4) Publicly accessible open space will be provided on the Appeal Site.

8.14. The details of the layout and house type design are to be agreed through the determination of a subsequent reserved matters application, with the detailed scheme to reflect the particular need for housing at that time.

8.15. Overall, the social benefits of the scheme can be afforded **substantial weight** in the overall planning balance.

Environmental

- 8.16. In terms of the environmental role, the Appeal Site is not located on land designated for its landscape value.
- 8.17. The Appeal Scheme will not have any material impact on existing ecology and will in fact lead to an overall biodiversity net gain through securing off-site enhancements.
- 8.18. The proposals would deliver sustainable homes allowing the fulfilment of this important objective whilst at the same time moving to a low carbon economy and securing an environmentally sustainable form of new residential development, with the Scheme securing an overall 10+% biodiversity net gain (to be refined at reserved matters stage).
- 8.19. On the basis of the above, there are environmental benefits which would arise from the proposals, to which, on balance, moderate positive weight should be attached in the overall planning balance.

Overall position on benefits

- 8.20. Overall, the benefits of the Appeal Scheme should be accorded **substantial** weight.

Overall Planning Balance

- 8.21. There is no "strong reason" for refusing the Appeal Scheme under paragraph 11(d)(i) to the NPPF. It is therefore necessary to turn to the tilted balance under paragraph 11(d)(ii).
- 8.22. The identified landscape and visual harms are only of **moderate** weight and the loss of 0.7ha of BMV attracts only **very limited weight**. The conflict with

the spatial strategy attracts **limited** weight. By contrast the package of benefits attract **substantial** weight.

8.23. Applying this test, the identified adverse impacts of granting planning permission would not significantly and demonstrably outweigh the benefits when assessed against the policies in the NPPF taken as a whole (quite the opposite). As such, the Appeal Scheme benefits from the presumption in favour of sustainable development.

8.24. The Appellant therefore consider that the Appeal should be allowed.

9. The Justification for the Inquiry Procedure

9.1. In accordance with the provisions set out in the PINS Guidance 'Criteria for determining the procedure for planning, enforcement, advertisement, and discontinuance notice appeals' (April 2022) (as amended and updated, most recently in August 2024), an Inquiry will be the most appropriate procedure in this instance because:

- There is a need for the evidence on landscape and visual issues, transport impacts, and the application of planning policy, the housing land supply position and planning balance, to be tested through formal questioning by an advocate.
- The issues are complex; and
- The Appeal has generated substantial local interest, sufficient to warrant an inquiry.

9.2. The issues which need to be assessed in the determination of the Appeal are complex and evidence will need to be presented by professional witnesses, particularly in dealing with matters relating to:

- The application of **local and national policy**.
- The extent and materiality of the shortfall in the **five-year housing land supply position** having regard to the overall planning balance.
- The need for and benefits of **affordable housing**.
- The **landscape and visual impacts** of the Appeal Scheme.
- The acceptability of the Scheme in **transport** terms.
- The judgment to be taken in carrying out the overall **planning balance**.

9.3. The Appellant and the Council are both expected to call up to 3 witnesses to deal with the issues above. The Appellant intends, subject to review of the LPA's Statement of Case, to call oral witnesses addressing landscape, highways, planning and housing need/supply matters. It is not intended that

oral evidence be called in respect of the issues of loss of agricultural land or water quality impacts. The appellant reserves the right to review its position on this following receipt of the LPA's statement of case.

- 9.4. There is also significant local public interest – with 35 objections submitted. As such, it is envisaged that the Appeal is likely to require 5-6 days for the evidence to be considered in full.
- 9.5. Material facts and matters of opinion are in dispute on a wide range of technical issues, such that evidence will need to be tested through formal questioning by an advocate.
- 9.6. Finally, legal submissions will need to be made in relation to a range of matters, including the application of the NPPF including the tilted balance of paragraph 11(d), the section 38(6) test.

.....

Documents to be referred to in Evidence (Not Exhaustive)

- Officer's Report and Minutes –Application No.250735 Land to the North of School Road, Arborfield Cross.
- Officer's Report and Minutes: Application No. 232490 Land off Langley Common Road, Arborfield, Wokingham.
- ALC Report for Land off Langley Common Road scheme
- Appeal Decision APP/X0360/W/24/3340006 - Land west of Trowes Lane and north of Charlton Lane, Swallowfield RG7 1RT
- Appeal Decision APP/A1910/W/23/3333545 Rectory Farm, Kings Langley, Hertfordshire, Dacorum, WD4 8HG
- Appeal Decision APP/X0360/W/24/3354667 (Land adjacent to Blagrove Lane, Wokingham RG41 4AX
- Housing Land Supply Statement of Common Ground agreed in Blagrove Lane appeal
- Affordable Housing Statement of Common Ground agreed in Blagrove Lane appeal
- Emails with case officer re: SANG access
- Local Plan Update Submission Plan
- Examining Inspector's Questions to the Council April 2025
- Housing and Economic Land Availability Reports.
- Affordable Housing Topic Paper.
- Settlement Hierarchy Report 2024

- Valued Landscapes Assessment.
- Landscape Character Assessment.
- LCWIP.