

DELEGATED OFFICER REPORT



WOKINGHAM
BOROUGH COUNCIL

Application Number:	260439
Site Address:	Land to rear of 297 to 303, Nine Mile Ride,, Finchampstead, Wokingham, RG40 3NR
Expiry Date:	18 May 2026
Site Visit Date:	17/03/2026
Proposal: Full application for the change of use of land to provide one gypsy/traveller pitch, including the stationing of a mobile home and touring caravan, erection of a day room, formation of a new vehicular access and associated parking, landscaping and ancillary works	

PLANNING POLICY	
National Policy	National Planning Policy Framework (NPPF) National Planning Policy Guidance (NPPG)
Core Strategy (CS)	CP1 – Sustainable Development CP3 – General Principles for Development 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
MDD Local Plan (MDD)	CC01 – Presumption in Favour of Sustainable Development CC02 – Development Limits CC03 – Green Infrastructure, Trees and Landscaping CC04 – Sustainable Design and Construction CC06 – Noise CC07 – Parking CC09 – Development and Flood Risk CC10 – Sustainable Drainage TB07 – Internal Space Standards TB10 – Traveller Sites TB21 – Landscape Character TB23 – Biodiversity and Development TB24 – Designated Heritage Assets
Joint Minerals and Waste Plan (JMWP)	DM1 - Sustainable Development DM2 - Climate Change – Mitigation and Adaptation

Wokingham Borough Local Plan Update (LPU)	SS1 – Sustainable development principles SS2 – Spatial strategy and settlement hierarchy SS3 – Development within or adjacent to major and modest settlements SS5 – Development in the countryside SS10 – Meeting our housing needs C1 – Active and sustainable transport and accessibility C2 – Mitigation of transport impacts and highway safety and design C3 – Active travel C5 – Parking and electric vehicle charging H1 – Housing mix, density and standards H2 – Presumption against residential losses H9 – Gypsies and Travellers and Travelling Showpeople provision H10 – Traveller sites FD1 – Development and flood risk (from all sources) FD2 – Sustainable drainage NE1 – Biodiversity and geodiversity NE2 – Biodiversity net gain NE3 – Thames Basin Heaths Special Protection Area NE4 – Trees, woodland, hedges and hedgerows NE5 – Landscape and design NE6 – Valued landscapes DH1 – Place making and quality design DH2 – Safeguarding amenity HC7 – Light pollution HC8 – Noise pollution
Other	Borough Design Guide Supplementary Planning Document CIL Guidance + 123 List

PLANNING HISTORY		
Application No.	Description	Decision & Date
061483	Proposed change of use of land to equestrian and erection of stables, hardstanding, new access, fencing and gates.	Refused, 09/10/2006
ENFORCEMENT HISTORY		
RFS/2025/090780	Land clearing of trees and shrubs without planning permission.	Closed on 16/12/2025.
OLD/2011/00214	Enforcement Notice for material change in use of land to use as a caravan site (namely, as land on which caravans are stationed for the purposes of human habitation and land which is used in conjunction with land on which caravans are so stationed.	Issued: 17.03.1976

CONSULTATION RESPONSES

Internal

WBC Drainage – No objections, subject to conditions.
WBC Highways – Objects to proposed development/further information.
WBC Landscape and Trees – Objects to proposed development.
WBC PROW – Advised that damage had be casued by caravans using Range Road.
WBC Ecology – Objects to proposed development.

External

Thames Water Utilities Ltd – No Comment

REPRESENTATIONS

Parish/Town Council

Finchampstead Parish Council – Objects on the following grounds:

- The site is unallocated countryside outside the settlement boundary, contrary to the plan-led approach; alternative traveller provision is identified elsewhere in the borough.
- The location is unsustainable and car-dependent, with poor access to services and public transport.
- Tree clearance and the proposed caravans, hardstanding and associated works would urbanise the rural setting, encroach into the countryside and harm woodland, wildlife and biodiversity, without substantiated Biodiversity Net Gain.
- Drainage, sewerage and utility arrangements are not adequately demonstrated, and additional hardstanding could worsen local drainage conditions.

Ward Member(s)

Councillor Charles Margetts - Objects on the following grounds:

- The site is unallocated countryside outside the settlement boundary and is considered an unsustainable, car-dependent location.
- Range Road is a narrow, unmade single-track lane unsuitable for caravans and large vehicles, raising highway-safety concerns.
- Tree loss, hardstanding, lighting and vehicle activity would harm the wooded rural character, erode the green gap, affect wildlife and encourage further development along the lane.
- Drainage, sewerage and utility provision are not adequately demonstrated; more suitable locations are considered available elsewhere in the borough.

	Councillor Charles Margetts has requested referral to Planning Committee if officers were minded to approve the application.
Neighbours	A three-week consultation period was undertaken for the application from 27 March 2026 to 19 April 2026. Objections were received from 77 respondents. The comments received during this period are summarised below: 1. Principle of Development and Planning Policy • <u>Countryside location</u>: The site lies outside the defined settlement boundary, within designated countryside, and is not allocated for development in the adopted or emerging Local Plan or the Finchampstead Neighbourhood Development Plan. The proposal is therefore considered contrary to the plan-led approach and policies that seek to restrict development in the open countryside. • <u>Traveller-site policy and alternative provision</u>: Objectors consider the site to be poorly located for traveller accommodation because it is remote from services and dependent on private vehicles. They also refer to more suitable or sustainable provision elsewhere in the borough, including proposed provision at High Barn Farm, Barkham. • <u>Precedent and intensification</u>: Approval is said to risk encouraging further pitches or incremental development along Range Road. The extent of hardstanding and uncertainty over future occupancy also raise concern about additional caravans, vehicles and a more intensive use of the site. 2. Highway Safety, Access and Transport • <u>Suitability of Range Road</u>: Range Road is described as a narrow, unmade, single-track byway with a poor surface, no footway, street lighting or formal passing places. Objectors consider it unsuitable for the additional day-to-day traffic and for the movement of caravans, mobile homes, construction vehicles, refuse vehicles and sewage tankers. • <u>Junction safety</u>: Restricted visibility, gradients and limited manoeuvring space at the junctions with Nine

	Mile Ride and Sandhurst Road are said to increase the risk of collisions. Vehicles meeting on the lane may be required to reverse considerable distances or towards the main roads. • <u>Vulnerable users</u>: Walkers, runners, cyclists, horse riders and children share the lane with vehicles and have limited space in which to take refuge. Increased traffic and the loss or damage of verge space are therefore considered harmful to public safety and recreational use. • <u>Emergency and service access</u>: The restricted width, poor condition and lack of passing and turning space may impede access by fire appliances, ambulances and other service vehicles, particularly if another large vehicle is already using the lane. • <u>Previous refusal</u>: Objectors refer to an earlier refusal based on the substandard nature of Range Road and its junction with Nine Mile Ride. They consider those concerns to remain applicable and note that local traffic levels have increased since that decision. 3. Accessibility and Sustainability • <u>Car-dependent location</u>: The site is remote from shops, schools, healthcare, public transport and other everyday facilities. With no safe pedestrian route or convenient cycle infrastructure, future occupants would be reliant on private vehicles, generating additional journeys on an unsuitable access road. 4. Landscape, Rural Character and Green Gap • <u>Urbanising effect</u>: The mobile home, touring caravan, day room, hardstanding, parking, lighting, boundary treatments and associated domestic activity would introduce a more urban form of development into a wooded rural setting. • <u>Green gap and visual impact</u>: The proposal, together with previous tree clearance, is considered harmful to the undeveloped appearance, tranquillity and visual quality of the countryside. It would also erode the green gap between Nine Mile Ride and Sandhurst Road and contribute to incremental urban creep. 5. Trees, Ecology and Biodiversity
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	• <u>Tree clearance and protection:</u> Respondents raise concern about substantial tree and vegetation clearance before determination of the application, possible harm to protected trees and roots, and whether the proposed no-dig construction method is compatible with access, hardstanding, drainage and utility works. • <u>Habitat loss and protected species:</u> Further clearance, hardstanding, fencing, lighting and residential activity could fragment woodland habitat and affect bats, badgers, deer, foxes, hedgehogs, owls, reptiles, amphibians, nesting birds and other wildlife using the site and adjoining land. • <u>Ecological baseline and Biodiversity Net Gain:</u> The ecological and arboricultural assessments are disputed because they were undertaken after clearance. Objectors argue that the pre-clearance condition should inform the baseline and that the application does not clearly demonstrate how the mandatory Biodiversity Net Gain requirement would be calculated, delivered and secured. • <u>Designated and priority habitats:</u> Potential effects are raised in relation to priority deciduous woodland, nearby ecological receptors and the Thames Basin Heaths Special Protection Area mitigation zone. Objectors request robust assessment and mitigation of both direct and cumulative effects. 6. Drainage, Flood Risk and Utilities • <u>Surface-water drainage:</u> The proposed hardstanding may reduce natural infiltration and increase runoff onto Range Road and Sandhurst Road, where flooding is already reported. The adequacy and location of soakaways and other drainage measures are considered unclear. • <u>Foul drainage and pollution:</u> The absence of a clearly demonstrated foul drainage arrangement raises concern about pollution of groundwater, Silverstock Bog and other sensitive habitats, as well as the frequency and practicality of sewage tanker access.
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	• <u>Utility provision:</u> No clear arrangements are shown for mains water, electricity, sewerage or waste collection. Objectors question how services could be installed and maintained without excavation or damage within protected root areas. 7. Residential and Recreational Amenity • <u>Noise, disturbance and outlook:</u> Additional vehicle movements, residential activity, servicing, lighting and the loss of existing screening could cause noise, visual intrusion and general disturbance to nearby residents. • <u>Light pollution:</u> Domestic, security and vehicle lighting would diminish the dark rural character of the lane and may adversely affect neighbouring properties and nocturnal wildlife. • <u>Recreational value:</u> Range Road is used for walking, running, cycling, horse riding and access to adjoining paths. Increased traffic and reduced verge refuge are said to make these activities less safe and diminish enjoyment of the route. 8. Cumulative Effects and Safety • <u>Relationship with application 260577:</u> Objectors request that the proposal be assessed alongside the adjacent application because the combined traffic, lighting, landscape, drainage, ecological and amenity effects may be materially greater than those of either scheme in isolation. • <u>Safety of future occupants:</u> Concerns include constrained emergency access, the proximity of caravans to mature or potentially unstable trees, woodland fire risk and the presence of stored or discarded materials. 9. Procedural and Enforcement Matters • <u>Unauthorised works and enforcement:</u> Respondents refer to tree clearance, verge works, the siting or occupation of caravans and other activity allegedly undertaken before permission, together with an existing enforcement position. They argue that prior site degradation should not reduce the weight given
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	to landscape or ecological harm. • <u>Insufficient information:</u> Further detail is requested on the number of occupants, vehicle parking and turning, access works, foul and surface-water drainage, utilities, lighting, landscaping, ecological mitigation and the delivery and long-term management of Biodiversity Net Gain. • <u>Neighbour notification:</u> Some residents state that consultation or formal notification was inadequate and request confirmation that all affected properties and interested parties have been given an opportunity to comment.
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APPRAISAL

Site Description and Proposed Development:

The application site comprises an area of open glade within an area of woodland located to the east of Range Road. Range Road is a narrow gravel byway and is characterised by its woodland setting. The site lies outside defined development limits and is within designated countryside.

Planning permission is sought for the change of use of land to provide one gypsy/traveller pitch, including the stationing of a mobile home and touring caravan, erection of a day room, formation of a new vehicular access and associated parking, landscaping and ancillary works.

Principle of Development

The National Planning Policy Framework (NPPF) contains a presumption in favour of sustainable development, which is reflected in the Development Plan. Policy CC01 of the Managing Development Delivery Local Plan states that planning applications which accord with the Development Plan should be approved without delay unless material considerations indicate otherwise.

The 2026 NPPF revoked the separate Planning Policy for Traveller Sites (PPTS) and incorporated traveller site policy directly into the Framework. Traveller accommodation is therefore assessed through the same national decision-making framework as other forms of housing development.

The key national policies are Policy S5 (Development Outside Settlements) and Policy HO12 (Gypsy, Traveller and Travelling Showpeople Accommodation). Policy S5(1)(g) provides support for development outside settlements where it would address an evidenced unmet need for gypsy, traveller or travelling showpeople accommodation, provided the proposal complies with Policy HO12. Such development should be approved unless its benefits are substantially outweighed by adverse impacts when assessed against the National Decision-Making Policies.

Footnote 26 to the NPPF confirms that an evidenced unmet need exists where a local planning authority cannot demonstrate a five-year supply of deliverable traveller sites as required by Policy HO3(b).

Need and Supply

The Council's evidence base is contained within the Gypsy and Traveller Accommodation Assessment (GTAA) 2023. The GTAA identifies a cultural need for 86 additional pitches between 2022/23 and 2039/40, including a requirement for 35 pitches within the first five years.

Following the 2026 changes to national policy, which assess need against the wider cultural definition rather than solely households meeting the previous planning definition, the Council is presently unable to demonstrate a five-year supply of deliverable traveller sites. As at 31 March 2026, the Council could demonstrate only 3.94 years of deliverable supply against the identified cultural need.

Accordingly, the Council has an evidenced unmet need for traveller accommodation for the purposes of Footnote 26 and Policy S5. To comply with S5(g), the proposal must meet the criteria in policy HO12.

Policy HO12 Assessment

Policy HO12 also requires consideration of the suitability of the particular location, including access to frequently used services such as education, welfare and healthcare facilities.

The location does not provide adequate accessibility to the services and facilities likely to be regularly required by future occupiers. As considered further within the Locational Sustainability section of this report, relevant services and facilities are outside recognised accessible distances. There is no cycle infrastructure, and the local buses do not meet the requirements of a good service. Accessibility is further constrained by the nature of Range Road as an unmade single track byway with no street lighting.

In addition, for the reasons set out within the Highways section, it has not been demonstrated that the existing access arrangements, including the junctions with Nine Mile Ride and Sandhurst Road, would provide safe and suitable access for all users.

The conclusion that the site represents an unsuitable location does not therefore arise simply from its position outside the settlement boundary. Rather, it reflects the particular physical and functional relationship of the application site with Finchampstead, its inadequate accessibility to frequently used services and facilities, and the identified constraints associated with the access arrangements.

Accordingly, notwithstanding the acknowledged unmet need for additional traveller pitches, the proposal would not satisfy the relevant requirements of Policy HO12 and consequently does not benefit from the support provided by Policy S5(1)(g).

Policy HO12(3), which relates specifically to the relocation of authorised traveller sites, is not applicable to this proposal.

Development Plan Assessment

The site lies outside defined development limits and is therefore subject to Policy CP11 of the Core Strategy. Policy CP11 seeks to protect the countryside and restrict development outside settlements unless it falls within one of the specified exceptions. The proposed traveller site does not satisfy any of those exceptions and is therefore in conflict with Policy CP11.

Policy TB10 of the Managing Development Delivery Local Plan specifically addresses traveller sites. The proposal conflicts with criterion (a) as the site is not located within, or immediately adjacent to, an existing settlement. Whilst the site access is approximately 44 metres from the defined settlement boundary of Finchampstead, physical proximity alone does not mean that the application site can reasonably be regarded as immediately adjacent to the settlement. The site itself is separated from the built-up area by intervening undeveloped woodland and is physically and visually experienced as part of the surrounding countryside. The proposal therefore conflicts with criterion (a).

The proposal is considered to comply with criteria (b) and (d). The development would not undermine the separate identity of settlements and is not constrained by flood risk, drainage, land stability or hazardous land issues.

As set out in other sections of this report, the site would not have adequate access to a range of local services and would not meet criterion (c) of TB10.

In relation to criterion (e), the development would introduce a residential pitch and associated built form, hardstanding, vehicles and domestic activity into an existing wooded and rural environment. Notwithstanding the degree of existing vegetation and screening, the proposal would have an urbanising effect and would cause harm to the character and appearance of the woodland area countryside. This matter is considered in greater detail within the Character and Appearance section of this report.

Criteria (f) and (g) are not relevant to the proposal. Compliance with criterion (h) could be secured through a planning obligation to provide appropriate Thames Basin Heaths SPA mitigation but this has not been secured.

The proposal would therefore conflict with policy CP11 and TB10 of the Core Strategy and MDD Local Plan.

Local Plan Update

Policy H10 of the emerging Local Plan Update (LPU) supports proposals for Gypsy and Traveller pitches where all of its criteria are satisfied.

In relation to criterion (a), the policy requires a site to be "well related" to a defined settlement. As stated above, the site would not be well located given its location

within a woodland area that is markedly different from the settled area of Nine Mile Ride. The proposal would also be poorly located with regard to facilities and services.

The proposal comprises a single pitch and would not, either individually or cumulatively, dominate the nearby settlement. Criterion (b) is therefore satisfied. The site is potentially capable of being served by utilities and infrastructure, including mains services available within the surrounding area, and would provide an acceptable standard of living for future occupiers without causing unacceptable impacts on neighbouring properties. Accordingly, the proposal is considered to comply with criteria (e) and (f).

However, there is conflict with criteria (c) and (d). As discussed in the Highways section of this report, the site is served by a single-track access road and the development would result in highway safety concerns. In addition, the proposal would introduce built form and associated domestic activity into a rural landscape, resulting in harm to the character and appearance of the countryside. Whilst existing vegetation provides some screening, the scheme would not fully mitigate its landscape effects.

Overall, the proposal does not comply with Policy H10 due to the identified highway and landscape impacts.

The Wokingham Borough Local Plan Update 2023-2040 is at an advanced stage of preparation, having been submitted for examination and with hearing sessions concluded. In their post-hearing letter dated 4 August 2026, the Inspectors indicated that the Plan is likely to be capable of being found sound and legally compliant, subject to main modifications. Nevertheless, the Plan has not yet been adopted and does not form part of the statutory Development Plan. It remains a material consideration to which weight may be afforded according to its stage of preparation, the extent of unresolved objections and its consistency with national policy.

Given the advanced stage of examination and the Inspectors' preliminary conclusions, moderate weight is afforded to emerging Policy H10. The policy is directly relevant to the determination of this application and reflects the direction of national policy in seeking to provide appropriate Gypsy and Traveller accommodation whilst ensuring development is suitably located and does not result in unacceptable environmental or infrastructure impacts. Although the proposal is considered to comply with several elements of Policy H10, the identified conflicts relating to highway safety and landscape character weigh against the development in the overall planning balance.

Summary on principle of development

The Council is presently unable to demonstrate a five-year supply of deliverable Gypsy and Traveller pitches, with 3.94 years of supply identified against cultural need. There is therefore an evidenced unmet need for traveller accommodation for the purposes of Footnote 26 of the NPPF. The provision of an additional pitch would contribute towards meeting this shortfall and this weighs in favour of the proposal.

In this case, however, the particular location and characteristics of the application site mean that the proposal does not satisfy the relevant requirements of Policy HO12.

The site would not provide adequate accessibility to frequently used services and facilities and, for the reasons set out elsewhere within this report, it has not been demonstrated that safe and suitable access can be achieved. The proposal therefore does not benefit from the support provided by Policy S5(1)(g).

The proposal also conflicts with Policies CP11 and TB10 of the adopted Development Plan by virtue of its countryside location, its physical and functional relationship with the existing settlement, inadequate accessibility to services and facilities, and the identified harm to the character and appearance of the countryside. There is additionally conflict with emerging Policy H10, to which moderate weight is currently afforded.

The identified unmet need for traveller accommodation and the contribution of one additional pitch towards that need are material benefits of the proposal. However, unmet need does not remove the requirement to demonstrate that a particular site represents an appropriate location or that unacceptable site-specific impacts would not arise. The weight attributable to the identified need must therefore be balanced against the Development Plan conflict and the identified locational, highway and landscape harms. These matters are considered collectively in the overall planning balance below, including against the applicable decision-making test within the NPPF.

Character of the Area / Landscape Character:

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

Policy TB21 of the Managing Development Delivery Local Plan states that proposals must demonstrate how they have addressed the requirements of the Council's Landscape Character Assessment, including the landscape quality; landscape strategy; landscape sensitivity and key issues. Proposals should retain or enhance the condition, character and features that contribute to the landscape.

Policy CC03 of the Managing Development Delivery Local Plan states that development proposals should demonstrate how they have considered and achieved the following criteria within scheme proposals:

- Provide new or protect and enhance the Borough's Green Infrastructure networks, including the need to mitigate potential impacts of new development
- Promote the integration of the scheme with any adjoining public open space or countryside
- Protect and retain existing trees, hedges and other landscape features
- Promote accessibility, linkages and permeability between and within existing green corridors including public rights of way such as footpaths, cycleways and bridleways

The Borough Design Guide Supplementary Planning Document provides further guidance for developers with general guidance that development should respond

positively to its site and local context (G1) and respond positively to the local character of the area (G2).

The application site comprises a predominantly wooded area featuring a central glade of open scrub grassland. Barring the site entrance and portions of the southern boundary where tree coverage is sparser, the open clearing is enveloped on all sides by woodland.

The open area of the application has been cleared in the past but aerial imagery and site visits show the land as forming an integral part of the woodland like an open glade with typical woodland understorey vegetation. Whilst the site appeared more stark and open after recent clearances, vegetation and woodland planting has quickly grown back. The site is not separate to the woodland but an integrated part to it - as can be seen from the photograph below:



Figure 1 - Site Photo 02.10.2026



Figure 2 - Google street view imagery taken in 2019 showing the front entrance of the application site.



Figure 3 - Google street view imagery taken in 2023 showing the front entrance of the application site.

Site context

The site falls within LCA M1 'Finchampstead Forested and Settled Sands' a High quality landscape of high sensitivity with the lowest capacity for change.

The site contains a number of the Valuable Landscape Attributes for the M1 LCA;

- *Large expanse of woodland containing mature trees which provide a sense of place*
- *Distinctive pattern of interconnected woodland and forestry, interspersed with wet woodland*
- *Distinctive long straight historic roads following the route of rides through former Royal Forest of Windsor*
- *Localised areas of tranquillity and remoteness*
- *Continuous network of woodland and forestry which helps to provide physical and visual separation between settlements*
- *Settlement pattern of low density post war properties in large plots along straight rides and notably the occasional wooded gaps between areas of settlement*

The Landscape Strategy to LCA M1 is to conserve and enhance existing character of 'Finchampstead Forested and Settled Sands'. The key aspects to be conserved and actively managed are the characteristic forestry and woodland; rarer open landscapes of heath, mire, lakes and pasture, important wildlife habitats, historic landscape features associated with the Royal Forest and recreational use. In terms of development the aim is to conserve and enhance the rural setting and gaps between settlements and maintain the low-density domestic character of development.

The application site sits within an attractive woodland network north of Nine Mile Ride that maintains physical and visual separation between nearby settlements. The immediate setting along Range Road features four dwellings and a commercial

business. In the broader locality, housing is characterised by sporadic residential development set within the woodland canopy, with access points extending off Sandhurst Road and Nine Mile Ride.

Assessment

The proposed development would result in a permanent and detrimental change to the established undeveloped character of the site and its relationship with the surrounding woodland landscape. The site currently forms an open glade within the wider woodland, and the absence of built development contributes positively to its rural and undeveloped character. Whilst there are a limited number of residential properties along Range Road, these do not define the wider character of the area. On entering Range Road from Nine Mile Ride, there is a clear transition from the more settled character of Nine Mile Ride to a distinctly more rural, wooded and undeveloped environment. The application site forms part of this wider woodland setting rather than the established pattern of residential development.

Whilst the central area of the site does not itself contain protected trees, it forms part of the wider woodland landscape and provides an established open component within an otherwise heavily wooded environment. The site lies within Woodland TPO Ref. 1083-2005, with established woodland enclosing much of the site and extending beyond its boundaries. The application site is an integrated part of the overall woodland.

The sensitivity of the site is reinforced by its location within LCA M1 'Finchampstead Forested and Settled Sands', which is identified as a high-quality landscape of high sensitivity with the lowest capacity for change. The LCA identifies the interconnected woodland network, localised areas of tranquillity and the open gaps which provide physical and visual separation between settlements as valued landscape attributes. Its landscape strategy seeks to conserve and enhance these characteristics, including the rural setting and low-density domestic character of the area.

Against this context, the proposal fails to maintain or enhance, the established character of the site and its relationship with the surrounding woodland landscape. The proposed development would introduce a distinctly domestic form of development into the existing open glade. The mobile home, touring caravan and day room, together with the associated hardstanding and domestic paraphernalia, would change the character of the site from an undeveloped area of grassland to a domesticated residential space. This would introduce an urbanising influence and erode the rural and tranquil qualities of the existing clearing.

The existing dwellings along Range Road have been taken into account. These generally comprise of a sparsely located properties with the undeveloped woodland setting being the dominant characteristic. Their presence does not define the character of the wider area or diminish the distinctly rural and wooded character experienced along Range Road when leaving Nine Mile Ride. The application site forms part of this undeveloped woodland setting rather than the established pattern of residential development within the settlement to the south. The introduction of built development and associated residential activity within the existing open glade would therefore represent a harmful encroachment into the countryside, extending domestic

development beyond the established pattern of development and eroding the rural woodland character of the area.

This is particularly relevant given the pressures identified within the M1 LCA, including 'continued pressure for expansion, infill and densification' and pressure for development to the rear of properties along Nine Mile Ride. Whilst the proposal is not conventional backland development, it would nevertheless contribute to the same incremental process of introducing residential occupation into the woodland landscape to the rear of established residential properties, eroding the connected woodland landscape.

The removal of trees along the site frontage has reduced the existing screening at the entrance, while the proposed driveway and hardstanding would introduce further domestic features into an otherwise undeveloped part of the site. These elements, together with the caravans, day room and associated paraphernalia, would be perceptible from Range Road and would alter the character experienced from the public realm.

The assessment of landscape impact is not limited to the extent of visibility from public viewpoints. Even where views are restricted, the introduction of residential accommodation and associated domestic activity would result in a fundamental change to the character and function of the open glade itself. The retention of surrounding woodland would therefore limit the extent of visual intrusion but would not prevent the underlying change in landscape character.

Overall, the proposal would result in the incremental domestication of the woodland landscape, erode an established open component of the site and conflict with the objective of conserving the rural setting, woodland character and spaces between development identified within the M1 Landscape Character Area.

The proposed development would have a negative and detrimental impact on the landscape character and appearance of the area. The introduction of development within open glade which is an integrated part of a woodland landscape in the countryside would result in a permanent and detrimental change to the established landscape character, eroding the character of the site and its relationship with the surrounding countryside and woodland. The proposal would therefore fail to conserve and enhance the character of the M1 'Finchampstead Forested and Settled Sands' Landscape Character Area and would be contrary to Policies CP1, CP3 and CP11 of the Core Strategy, Policies CC03 and TB21 of the MDD Local Plan, the Wokingham District Landscape Character Assessment, N2 of the NPPF and Principle R24 of the Borough Design Guide.

Highway Access and Parking:

Policy context

Core Strategy Policy CP6 seeks to ensure that development provides appropriate parking, enhances road safety and does not cause highway problems. Policy C2 of the emerging Local Plan Update similarly requires development to provide safe and suitable access for all users.

Policy TR4 of the NPPF requires transport considerations to be integral to the design of development. Among other matters, streets and routes should be safe and inclusive, minimise conflict between pedestrians, cyclists and vehicles, and allow appropriate access by service and emergency vehicles. Policy TR6(4) states that development proposals should be refused where they would have an unacceptable impact on highway safety, taking account of any proposed mitigation. This test applies both during construction and following completion.

Existing access arrangements

The site would be accessed from Range Road, a byway open to all traffic. Range Road can be accessed via two entry points, from Sandhurst Road to the north and Nine Mile Ride to the south. At this location, Sandhurst Road is subject to a 50mph speed limit, while Nine Mile Ride is subject to a 30mph speed limit. Accordingly, in accordance with Manual for Streets guidance, visibility splays of 2.4m x 43m and 2.4m x 160m are required respectively.

Junction at Nine Mile Ride and Range Road

As demonstrated in figures 5 and 6 below, the easterly visibility splay is affected by a raised bank, vegetation, signage and a tree stump. These features are approximately 1.1 metres above the level of the Range Road carriageway and therefore exceed the 0.6-metre maximum obstruction height normally applied within a visibility envelope. The westerly sightline is partly restricted by a hedgerow adjoining the footway, while overhanging vegetation also affects visibility to the east, although this does appear to be within land within the highway verge.

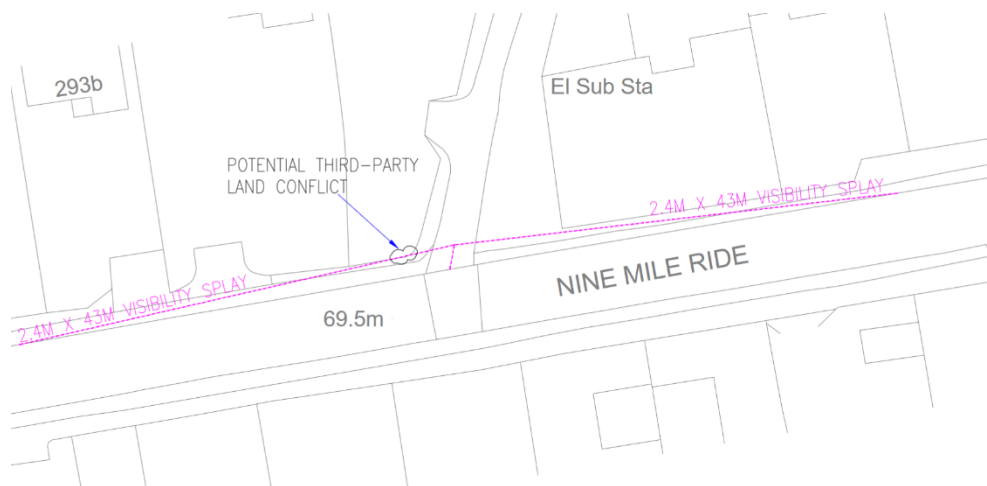


Figure 5 – Range Road And Nine Mile Ride (B3430) Junction Visibility Splay Lines



Figure 6: Adopted highway verge (highlighted in green) at Range Road/Nine Mile Ride

Manual for Streets advises that carriageway widths should respond to their context, including the composition and volume of traffic and the level of pedestrian activity. A width of approximately 4.8 metres is generally capable of accommodating two-way vehicle movement.

Table A1 of the Council's *Living Streets: Highways Design Guide* identifies a minimum carriageway width of 4.1 metres for an internal access road serving fewer than ten dwellings, increasing to 4.5 metres where between 10 and 25 dwellings are served. While these standards principally concern new streets, they provide a relevant benchmark when assessing the practical limitations of the existing access.

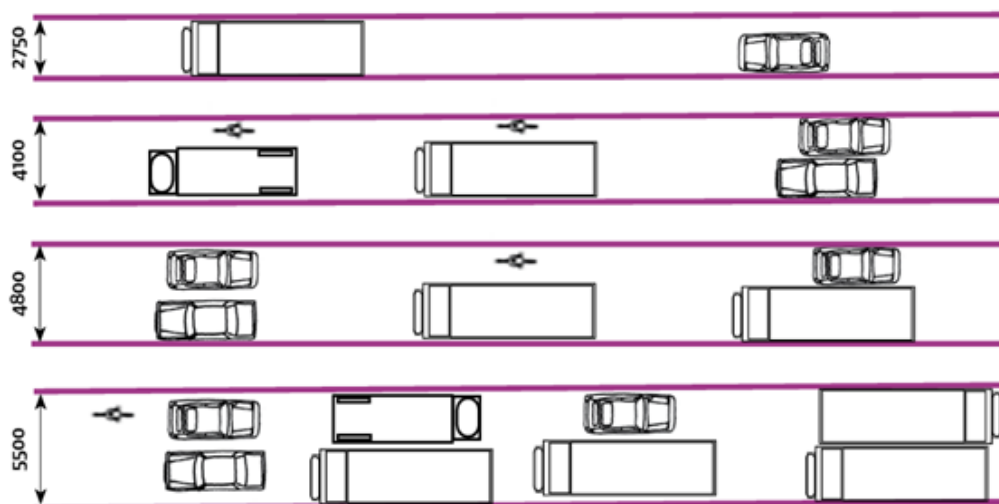


Figure 7: Extract from Council's Living Streets: Highways Design Guide which illustrates what various carriageway widths can accommodate.

Range Road does not achieve a width of 4.1 metres and operates predominantly as a narrow, single-track route. The initial section adjoining Nine Mile Ride is wider, however, the metalled width varies and the junction is not marked with centre or edge

lines. Vehicles are likely to approach and leave the junction in a relatively central position.

The area of Range Road adjacent to Nine Mile Ride provides limited space for two vehicles to pass and little margin for correction or manoeuvring. If vehicles meet close to the junction, one may need to stop or reverse towards the verge or junction mouth. This would be more difficult during hours of darkness because Range Road is unlit and vehicle headlights principally illuminate the area immediately ahead, rather than the verges and areas alongside or behind a reversing vehicle.

It is important to note that the Council's *Living Streets: Highways Design Guide* identifies a minimum carriageway width of 4.1 metres for an internal access road serving fewer than ten dwellings. However, as demonstrated in Figure 7 above, this width is based on accommodating two-way movement between two saloon-sized vehicles. The proposal includes a touring caravan, which is wider than a typical saloon vehicle. Accordingly, given the nature and dimensions of the vehicles associated with the proposal, a carriageway width of 4.8 metres, as shown in Figure 7, is considered more applicable to safely accommodate, at a minimum, two-way movement between a touring caravan and a saloon-sized vehicle.

In addition to the narrow width and unmarked junction with Nine Mile Ride, insufficient evidence has been provided to demonstrate that the existing junction geometry would allow two vehicles to pass safely at the junction while maintaining appropriate swept paths without encroaching into the opposing traffic lane. In the absence of vehicle-tracking evidence, the Council cannot be satisfied that the junction can safely accommodate the additional vehicle movements associated with the proposed development, including those of vehicles reasonably likely to access the site.

This weighs against the proposal under Core Strategy Policy CP6, emerging Policy C2 and NPPF Policies TR4 and TR6.

The Council has further concerns regarding the suitability of the route from Nine Mile Ride along Range Road to the proposed site access. Beyond the junction with Nine Mile Ride, Range Road narrows to a gravel single-track carriageway. There are no formal passing places between the junction and the proposed site access, approximately 115 metres to the north. The route is also unlit and has no dedicated pedestrian footway. Its boundaries are formed principally by raised banks and mature vegetation, leaving limited opportunities for pedestrians or cyclists to move clear of an approaching vehicle.

Policy TR4 is directly relevant in this respect because it requires development to minimise conflict between pedestrians, cyclists and vehicles and to provide safe and inclusive routes for all users.

The relatively straight alignment provides drivers with some forward visibility of approaching vehicles and other users, although the section adjacent to Nine Mile Ride does kink and forward visibility is not fully immediate until passing Range Road House or adopting a central position when approaching from the south. The constrained width and enclosed character of the route are likely to suppress vehicle speeds. These factors reduce, but do not remove, the potential for conflict. Where two

vehicles meet between the junction and the site access, one vehicle would be required to wait at a suitable point or reverse until sufficient width became available. However, no assessment has been provided to demonstrate that sufficient reversing distance or suitable locations for vehicles to safely pass or wait are available along this section of Range Road.

Junction at Sandhurst Road and Range Road

No information has been submitted regarding the northern access to Range Road from Sandhurst Road. However, it is the Officer's observation that this access is more constrained, being narrower than the southern access and measuring less than the 4.1 metre. Furthermore, the northern access is approximately 425 metres from the proposed site entrance. The concerns identified above regarding limited forward visibility, opportunities for vehicles to pass and the potential need for vehicles to reverse are therefore further compounded along this section of the route.

Traffic generation and highway safety

The proposal is for a single traveller pitch comprising one mobile home, one touring caravan and a day room. It would add to the five existing residential properties stated to be served by Range Road. The applicant's TRICS assessment forecasts no additional vehicle movements during the morning or evening peak periods and six two-way movements over a 12-hour day, equating to fewer than one movement per hour on average. The Highways Officer considers that the level of trip generation associated with the proposal would be insignificant during the peak periods on the wider highway network.

The limited level of traffic indicates that the proposal would be unlikely to have a severe adverse effect on the capacity or operation of the wider transport network. The available STATS19 information is also stated to identify no recorded personal-injury collisions along Range Road or at its immediate junctions during the seven-year period assessed.

However, low traffic generation and the absence of recorded collisions do not demonstrate that the access arrangement is inherently safe. Nor do they overcome the unresolved concerns regarding achievable visibility, the position vehicles would occupy at the junction, the absence of passing places, and the manoeuvring requirements of vehicles towing caravans.

Insufficient technical evidence has been submitted to demonstrate that the additional movements, including foreseeable towing movements, could be safely accommodated by the constrained junction and single-track access route. The limited number of movements reduces the frequency of potential conflicts, but it does not adequately address the nature or consequences of those conflicts when they occur.

Parking and servicing

Policy CC07 and Appendix 2 of the MDD Local Plan set out the Council's parking standards, which provide a starting point for assessing individual proposals. The Borough Design Guide SPD advises that parking spaces should generally measure at

least 5 metres by 2.5 metres and should be safe, convenient and positioned so as to minimise impacts on highway safety.

The proposal includes on-site parking and space to turn and leave in a forward gear.

Manual for Streets advises that residents should not normally be required to carry refuse more than 30 metres and that collection operatives should not normally be required to move bins more than 25 metres to the collection vehicle. Given that the site is approximately 115 metres from Nine Mile Ride, collection from the main road would not provide an acceptable arrangement.

The Rights of Way Team has also identified previous damage to the byway associated with caravan access. This is relevant to the suitability and durability of Range Road for the proposed use, although any reliance on this matter would need to be supported by clear evidence of the nature, extent and cause of that damage.

Conclusion

The proposed development would rely on access via Range Road, a narrow single-track byway that connects to the public highway network at Nine Mile Ride and, to the north, Sandhurst Road. The route is constrained by its width, lacks formal passing places, is unlit, contains no pedestrian footway and provides limited opportunities for pedestrians and cyclists to move clear of vehicles. In addition, concerns remain regarding visibility and geometry at the junction with Nine Mile Ride, the limited space available for vehicles to pass or manoeuvre close to the junction, and the absence of evidence demonstrating that vehicles associated with the proposed traveller pitch, including vehicles towing touring caravans, can safely enter and leave the site without conflict with other road users. There is no information regarding the northern access via Sandhurst Road and this appears even narrower than the southern junction.

Whilst the applicant's evidence indicates that the proposal would generate a relatively small number of vehicle movements and would be unlikely to result in a severe impact on the operation of the wider highway network, this does not in itself demonstrate that the access arrangements are safe. Whilst the council has sought further information, there are a number of significant issues with the access arrangement. No swept-path analysis or other technical evidence has been submitted to demonstrate that vehicles can safely negotiate the junction with Nine Mile Ride, pass opposing traffic, or accommodate the foreseeable movements associated with the proposed use. Consequently, the Council cannot be satisfied that safe and suitable access can be achieved for all users.

Locational Sustainability:

Policy CP9 of the Core Strategy states 'the scale of development proposals in the borough must reflect the existing or proposed levels of facilities and services at or in the location, together with their accessibility.'

Policy CP6 of the Core Strategy states:

'Planning permission will be granted for schemes that:

a) Provide for sustainable forms of transport to allow choice;

b) Are located where there are or will be at the time of development choices in the mode of transport available and which minimise the distance people need to travel;'

The supporting text to Policy CP6 states:

'Paragraph 2.16 recognises that the borough has one of the highest car ownership rates of any English local authority. To reduce the likelihood that these vehicles will be used and to encourage modal shift, it is important to ensure all proposals achieve sustainable development'

'To help achieve sustainable development, proposals likely to generate significant demands for travel movements should be located in areas with best access to existing good services. This means that people can have the widest range of choice in selecting transport modes and help reduce the use of the private car. The availability of good existing public transport services has been considered in drafting the strategy for the Borough.'

The Borough Design Guide SPD states 'if places are to be sustainable then the aim should be to create: Walkable neighbourhoods, with a range of facilities within 10 minutes walking distance of residential areas, which encourage people to travel on foot or by bicycle.' Walkable neighbourhoods are defined in Manual for Streets (MfS) as those typically characterised by having a range of facilities within 10 minutes walking distance from residential areas. Manual for Streets clarifies that 10 minutes walking distance is roughly 800 metres. The Urban Design Compendium further advises:

'People should be able to walk in 2-3 minutes (250 metres) to the post box or telephone box: the newsagent's should be within 5 minutes (400 metres). There should be local shops, the bus stop, the health centre and perhaps a primary school within a walking distance of (say) 10 minutes (800 metres).'

The National Design Guide states that a walkable means 'local facilities are within walking distance, generally considered to be no more than a 10 minute walk (800m radius)'.

The Chartered Institution of Highways and Transportation (CIHT) document 'providing for journeys on foot' states approximately 80% of walk journeys are less than one mile. The average length of a walk journey is one kilometre (0.6 miles). The location of local facilities would fall outside of this norm.

The document further advises that 400 metres is a desirable walking distance outside of city centres; 800 metres is stated as acceptable and 1,200 metres is the preferred maximum. The document further states that these suggested walking distances are for pedestrians without a mobility impairment. The definition of a pedestrian MfS includes people of all ages, sizes and abilities. Therefore, the maximum distance in the CIHT document does not take into account disabled, elderly or small children and

is referred to as an upper limit: the maximum threshold would not result in an inclusively located development where people of all ages, sizes and abilities would be encouraged to walk to local services.

Along with distances, the movement framework should be safe, convenient and inclusive. This is set out in CS policy CP2, Manual for Streets and the National Design Guide.

Assessment:

In assessing pedestrian accessibility and highway safety, Range Road serves as the primary route connecting the site to the wider network. Range Road is an unlit single-track rural lane lacking a dedicated pedestrian footway, with the nearest formal footway located 127 metres away along Nine Mile Ride. While vehicle speeds are naturally constrained by the narrow road width and low traffic volumes, the absence of lighting and footways represents a distinct limitation. The lack of segregated pedestrian space, formal surfacing or street lighting reduces comfort and safety, particularly during hours of darkness, inclement weather or for more vulnerable pedestrians such as individuals with reduced mobility or adults with pushchairs. The sides of the byway often contain small embankments and so moving out of the path of vehicles is difficult in many areas.

Regarding access to key everyday amenities, the site is situated beyond standard walking thresholds. Primary education at Nine Mile Ride Primary School is located approximately 1.3 kilometres away, equating to an estimated 18-minute walk and a round trip of 36 minutes. Local convenience stores, takeaway food outlets, and a pharmacy are roughly 1.2 kilometres away, requiring a 17-minute walk, while healthcare at Finchampstead Surgery lies approximately 1.5 kilometres away, representing a 21-minute walk.

Public transport options along Nine Mile Ride are similarly restricted. The bus stops opposite Nos. 306 and 312 provide a limited service of roughly seven buses per day on weekdays only, with no weekend provision and no waiting shelters at the stops. This does meet the definition of a good service as set out in policy CP6.

In terms of cycling, the local network lacks dedicated cycle infrastructure, and Nine Mile Ride is subject to a 30mph speed limit.

When measured against national and local guidelines, these distances exceed the standard 800-metre or 10-minute walking radius associated with highly walkable neighbourhoods. Public transport is infrequent, unsheltered, and absent at weekends, it does not offer a comprehensive alternative for routine trips and there is no integrated cycle infrastructure. In addition, Range Road is a narrow unlit and unmade track with no designated footpaths. As set out in the preceding section, the Junction arrangements with Nine Mile Ride and Sandhurst Road or also substandard and raise highway safety concerns.

Taking all these factors together, the site is not well located with regard to services and infrastructure and residents would be reliant on private vehicles for day-to-day needs. Contrary to policies CP1, CP2, CP3, CP6 and CP11 of the Core Strategy,

CC01 and CC02 of the MDD Local Plan, the Borough Design Guide SPD and policy TR3 and TR4 of the NPPF.

Amenity Space:

Page 48 of the Borough Design Guide states that private garden space should be usable. This generally means that gardens should:

- be roughly rectangular in shape;
- receive direct sunlight for some of the day;
- be capable of accommodating activities such as sitting, play, clothes drying and outside storage space, which will require a level area within the garden;
- and
- provide a secure external access to the rear garden for cycle storage.

While the proposed residential curtilage is not configured as a conventional rectangular rear garden, the layout and positioning of the three structures create a central open area that provides an adequate, level area to accommodate these functional requirements. The proposal therefore delivers a satisfactory standard of private amenity space for future occupants, in accordance with the Borough Design Guide and Policy CP3 of the Core Strategy.

Neighbouring Amenity:

Policy CC06 and Appendix 1 of the MDD Local Plan requires that development protect noise sensitive receptors from noise impact

There will be no detrimental impact on neighbouring occupiers in terms of loss of privacy, loss of light or an overbearing impact due to the distance from other residential properties.

Impact on Trees:

Policy CP1 of the Core Strategy development plan states that planning permission will be granted for development proposals that maintain or enhance the high quality of the environment and Policy CP3 seeks to maintain or enhance the ability of the site to support fauna and flora including protected species.

Policy CC03 of the MDD Local Plan aims to protect and retain existing trees, hedges and other landscape features.

The site is in the countryside, located set back from the north side of Nine Mile Ride (a non-designated Heritage Asset), deep within a woodland which is protected by an 'Area' TPO Ref. 1083-2005. The protected woodland is adjacent to the rear garden boundaries of a number of dwellings that face Nine Mile Ride. The woodland consists of Scots Pine, Oak, Silver Birch, Holly.

The protected woodland that surrounds the site and stretches beyond it is almost contiguous where only Range Road separates it from other woodland parcels to the east and west including; TPO 0555-1992 on the northern and eastern boundaries,

TPO2013/2026 on the west side opposite the woodland in which the site is located.

Arboriculture

The Council's Trees and Landscape Officer has reviewed the submitted Arboricultural Impact Assessment and Arboricultural Method Statement. The AIA states that the proposed development would allow for the healthy retention of all trees within and adjacent to the site and that no facilitation pruning would be required.

However, the Trees and Landscape Officer considers that the submitted information does not adequately demonstrate that the retained trees and woodland can be satisfactorily protected from the proposed development. In particular, concerns have been raised regarding the relationship between the proposed residential use and the retained woodland, including Group G11, and the potential for increased activity associated with residential occupation to adversely affect the woodland and its long-term integrity.

Further concerns relate to the proposed site entrance and the protection of the Category A Oaks T5 and T6, together with the Root Protection Areas (RPAs) of T3, T4 and T8. The submitted site layout does not clearly demonstrate how these RPAs would be protected within the proposed access, driveway and open space, or how they would be safeguarded from construction activity and subsequent pressure arising from the occupation and use of the site.

The Officer has also raised concerns regarding apparent recent tree clearance within the site and the potential effect this may have had on the integrity and landscape character of the protected woodland. In this context, the proposal has not sufficiently demonstrated that the existing landscape character and the wider contribution made by the woodland and trees would be maintained.

The proposal is also considered to have insufficient regard to the requirements of Policy TB21 of the MDD Local Plan and the M1 Landscape Character Area, which seeks to conserve and enhance the existing character, including through the management of forestry and woodland and the conservation and enhancement of the rural setting.

Whilst the submitted AIA and AMS state that the existing trees can be retained, the information submitted does not provide sufficient evidence to demonstrate that the trees and their RPAs, particularly those identified by the Trees and Landscape Officer, can be adequately protected from the proposed development and the subsequent residential use of the site. This is particularly important given the site's location within and immediately adjoining a woodland protected by a TPO.

It is therefore considered that the proposal fails to demonstrate that existing nearby trees, including trees protected by TPO Ref. 1083-2005, would not be adversely affected by the development. In the absence of sufficient arboricultural information and appropriate tree protection measures, the proposal is considered unacceptable in respect of its impact on existing trees and woodland, contrary to Policies CP1 and CP3 of the Core Strategy, Policy CC03 of the MDD Local Plan and the relevant provisions of Section 19 of the NPPF 2026.

Flooding and Drainage:

The application site is located within Flood Zone 1 and with a low probability of surface water flooding according to EA mapping.

WBC Drainage have no objections to the proposals providing a drainage strategy is secured prior to the commencement of development. This could be secured via condition in the event of any approval.

Ecology:

The Council's Ecology Officer has reviewed the application and raises an objection in relation to the submitted biodiversity information and the ability to demonstrate compliance with the statutory Biodiversity Net Gain (BNG) requirements.

The applicant identifies the site as a felled section of mixed woodland and recognises it as a priority habitat. The Natural England Priority Habitat Inventory identifies the site as Lowland Mixed Deciduous Woodland, which is a Habitat of Principal Importance. The Ecology Officer notes that, whilst recently felled woodland can be recorded within the Statutory Biodiversity Metric as 'woodland and forest: felled', this is intended as a precautionary classification where the original habitat type cannot be reliably established. In this case, the available Priority Habitat Inventory identifies the woodland type and, therefore, the baseline should reflect Lowland Mixed Deciduous Woodland. The Officer further considers that, applying a precautionary approach, the habitat should be assessed as being in 'good' condition.

The Officer considers that the submitted information does not provide a sufficiently accurate or consistent baseline from which the biodiversity value of the site can be established. In particular, no standalone Biodiversity Metric spreadsheet has been submitted to support the assessment and inconsistencies are present between the submitted ecological documents. Paragraph 8.2.2 of the Preliminary Ecological Appraisal identifies the priority woodland as being of medium distinctiveness, whereas the submitted Metric categorises the habitat as having high distinctiveness. No clear justification has been provided for the differing assessment or for any reduction in the ecological value of the woodland. The Officer also notes that the apparent clearance within the site, identified through aerial imagery, does not in itself demonstrate ecological degradation and could potentially represent woodland management, such as coppicing, which may increase structural diversity and biodiversity value.

The Officer therefore considers that the submitted information does not adequately establish the extent, type and condition of the site's existing habitats and, consequently, does not provide a sufficiently reliable baseline biodiversity value against which the effects of the development and any proposed biodiversity net gain can be assessed.

The Ecology Officer has also raised concerns regarding the application of the Biodiversity Gain Hierarchy. The hierarchy requires impacts on habitats of medium and high distinctiveness to be avoided in the first instance, followed by mitigation and, where impacts cannot be avoided or mitigated, compensation as a last resort. The application does not demonstrate that impacts to the priority woodland have been

appropriately avoided or mitigated, nor does it provide sufficient justification as to why these measures cannot be achieved.

Whilst the submitted Preliminary Ecological Appraisal proposes a limited area of habitat creation, this comprises approximately 0.0023 hectares of 'other woodland; broadleaved' habitat and is anticipated to achieve only 'poor' condition. The Ecology Officer considers that this would not provide meaningful compensation for the loss or degradation of the priority woodland habitat, either in terms of its extent or ecological function. No evidence of on-site habitat enhancement has been provided.

The application also refers to the purchase of biodiversity units to address any residual biodiversity loss. However, no details have been provided regarding the location, habitat type or quantity of any proposed off-site units. The Ecology Officer therefore considers that it is not possible to establish whether the proposed compensation would be appropriate or sufficient to address the biodiversity impacts arising from the development.

Accordingly, the submitted ecological information does not provide a sufficiently accurate or consistent assessment of the site's baseline biodiversity value, nor does it demonstrate how impacts to the priority woodland would be avoided, mitigated or adequately compensated for. In the absence of this information, the Local Planning Authority cannot be satisfied that the development would achieve the statutory minimum 10% Biodiversity Net Gain or that the Biodiversity Gain Hierarchy has been appropriately applied.

The proposal is therefore considered unacceptable on ecological grounds and contrary to Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021) and the relevant provisions of the Biodiversity Gain Hierarchy.

Priority species

The Ecology Officer has also raised concerns regarding the loss and degradation of priority woodland habitat and potential impacts on protected and priority species. In particular, the clearance of woodland prior to the undertaking of appropriate ecological survey work has raised concerns in relation to bats, including the potential loss of roosting, foraging and commuting habitat. Potential impacts on reptiles, amphibians, badgers and small mammals during construction have also been identified. Furthermore, the Ecology Officer considers that the introduction of residential lighting into the currently undeveloped and unlit site presents a potential risk of disturbance to bats and other nocturnal species.

The Case Officer is aware that a degree of tree and vegetation clearance took place prior to the submission of the application, as confirmed by the enforcement history under reference RFS/2025/090780. It is noted, however, that much of this clearance appears to have been undertaken to facilitate the site entrance. The area identified for the proposed development is an existing open glade which has historically been relatively free of mature tree cover but covered by understorey vegetation and an integrated part of the overall woodland.

Summary

Overall, insufficient information has been provided to demonstrate that the proposal would appropriately address its ecological impacts. In particular, the application has not established a sufficiently reliable biodiversity baseline; demonstrated appropriate application of the Biodiversity Gain Hierarchy; demonstrated delivery of the statutory minimum 10% BNG; adequately justified or compensated for the loss of priority Lowland Mixed Deciduous Woodland; or demonstrated that appropriate buffers to retained and adjoining priority woodland would be provided.

In addition, the loss of woodland prior to appropriate ecological survey means that potential impacts upon bat roosting habitat cannot now be fully established, while the introduction of lighting associated with the residential use presents an identified risk to the function of the surrounding woodland as bat foraging and commuting habitat. The Ecology Officer considers that this lighting impact could not be adequately controlled or mitigated.

The proposal has therefore not demonstrated that ecological impacts can be satisfactorily avoided, mitigated or compensated for, and has not demonstrated compliance with the statutory BNG framework or the requirements of Core Strategy Policy CP7 and Policy TB23.

Thames Basin Heath Special Protection Area:

The proposal is located within 5km of the Thames Basin Heath Special Protection Area and therefore meets the threshold required to mitigate its impact on this through contributing to the Council's mitigation strategy as per policy CP8 of the Core Strategy.

Policy CP8 states that where there is a net increase in dwellings within 5km of the SPA, contributions to access management measures and monitoring in line with the Delivery Framework will be required.

A Section 106 Planning Obligations Agreement can be engaged to mitigate against the impacts on the SPA. However, due to the numerous issues with the application, it was not considered to be it was considered that further discussions would be unnecessary and costly for all parties.

Furthermore, the proposed bedroom provision has not been specified within the application submission, and clarification has not been provided by the agent. As the calculation of the required financial contribution towards SPA avoidance and mitigation measures is dependent on the number of bedrooms proposed, it is not possible to accurately establish the level of mitigation required or complete the Appropriate Assessment at this stage. Consequently, the Council is unable to conclude that the proposed development would avoid an adverse effect on the integrity of the 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 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.

Community Infrastructure Levy (CIL):

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

Planning Balance and Conclusion

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications for planning permission be determined in accordance with the development plan unless material considerations indicate otherwise. The assessment of this proposal requires a careful balancing of the public benefits arising from the provision of traveller accommodation against landscape, arboricultural, ecology, highway safety, accessibility and in-principle policy conflicts.

The proposal would contribute towards an evidenced unmet need for traveller accommodation, together with a settled base. However, the benefits arising from this relate to a single pitch.

Against this benefit, the proposal conflicts with Policies CP11 and TB10 of the Development Plan and the principle of development is unacceptable. The site is outside defined development limits and within the countryside and does not satisfy the locational requirements of Policy TB10. The proposed development also fails to meet policy S5 and HO12 of the NPPF.

The proposal would result in significant harm to the character and appearance of the countryside. The introduction of a mobile home, touring caravan, day room, hardstanding and associated domestic paraphernalia would urbanise an opening within the wider woodland countryside landscape and represent encroachment beyond the established pattern of development. Given the site's location within the high-quality and highly sensitive M1 Finchampstead Forested and Settled Sands Landscape Character Area, and the objective to conserve its woodland character and rural setting, this landscape harm attracts significant weight.

The site also performs poorly in terms of sustainable transport and accessibility. Key services are beyond acceptable walking distances and public transport is limited, while Range Road is an unlit single-track route without a footway.

There are also significant unresolved highway safety concerns. Range Road is narrow and predominantly single-track, with no formal passing places, while the junction with Nine Mile Ride has constrained visibility and limited space for vehicles to pass or manoeuvre. It has not been demonstrated that vehicles associated with the

proposed use, including vehicles towing a touring caravan, could safely negotiate the route and junctions. Whilst traffic generation would be low and there is no identified pattern of personal-injury collisions, this does not demonstrate that the access is safe and suitable for the proposed use. This issue attracts significant weight against the proposal.

The proposal also gives rise to arboricultural and ecological concerns, including the potential impact on the TPO-protected woodland, the protection of retained trees and the reliability of the submitted biodiversity baseline. The development would introduce residential activity, hardstanding and associated domestic paraphernalia within an area of protected woodland, and the submitted information does not satisfactorily demonstrate that retained trees and their root protection areas would be adequately protected. The ecological information also does not satisfactorily establish the site's biodiversity baseline or demonstrate compliance with the Biodiversity Gain Hierarchy.

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, TB10 of the MDD Local Plan and N6 of the NPPF.

Overall, positive weight is afforded to the acknowledged unmet need for Gypsy and Traveller accommodation and to the contribution that one additional pitch would make towards addressing the identified shortfall. That need does not, however, remove the requirement for an individual proposal to represent an acceptable form of development in an appropriate location. In this case, the benefits of providing one additional pitch are substantially outweighed by the combined adverse impacts arising from the unsuitable location, harm to landscape character, unresolved highway safety concerns and the other identified environmental impacts.

The proposal fails to satisfy the requirements of Policies S5 and HO12 of the NPPF and conflicts with the Development Plan when read as a whole. The material considerations in favour of the development, including the acknowledged unmet need for traveller accommodation, are not sufficient to indicate that planning permission should be granted contrary to the Development Plan. The application is therefore recommended for refusal.

The Public Sector Equality Duty (Equality Act 2010):

In determining this application the Council is required to have due regard to its obligations under the Equality Act 2010. The key equalities protected characteristics include age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation. There is no indication or evidence (including from consultation on the application) that persons with protected characteristics as identified by the Act have or will have different

needs, experiences, issues and priorities in relation to this particular planning application and there would be no significant adverse impacts as a result of the development.

Human Rights:

In considering this application, the Council has had regard to its obligations under the Human Rights Act 1998, including Article 8 (the right to respect for private and family life and the home) and Article 14 (protection from discrimination). It is noted that the application site is currently unoccupied and no person resides on the land.

As such, the refusal of planning permission would not interfere with any existing right to a home or to private and family life. The decision has been taken on planning grounds, applies equally to all, and does not give rise to unlawful discrimination. Accordingly, it is concluded that the refusal does not result in a breach of Articles 8 or 14.

RECOMMENDATION

Conditions agreed:	Not required
Recommendation:	Refusal
Date:	14 April 2026
Earliest date for decision:	19 April 2026

Recommendation agreed by: (Authorised Officer)	<i>MC</i>
Date:	12.10.2026

The Conservation of Habitats and Species Regulations 2017 Screening Assessment and Appropriate Assessment

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

Summary of Response

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

This site is located approximately **3.4 km** (measured from the access road to the application site) from the boundary of the SPA and therefore is likely to result in an adverse effect on the SPA, unless it is carried out together with appropriate avoidance and mitigation measures.

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

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

In this instance, the proposed bedroom provision has not been specified within the application submission, and clarification has not been provided by the agent. As the assessment relies on the number of bedrooms to establish the likely level of recreational pressure arising from the development, it is not possible to accurately undertake the assessment at this stage.

In this instance, the proposed bedroom provision has not been specified within the application submission, and clarification has not been provided by the agent. As the calculation of the required financial contribution towards SPA avoidance and mitigation measures is dependent on the number of bedrooms proposed, it is not possible to accurately establish the level of mitigation required or complete the Appropriate Assessment at this stage. Consequently, the Council is unable to conclude that the proposed development would avoid an adverse effect on the integrity of the SPA.

1. The Conservation of Habitats and Species Regulations (2017) as amended

In accordance with The Conservation of Habitats and Species Regulations (2017) as amended, Regulation 63, a competent authority (in this case Wokingham Borough Council (WBC)), before deciding to undertake, or give any consent, permission or other authorisation for, a plan or project which—

- a. is likely to have a significant effect on a European site...(either alone or in combination with other plans or projects), and
- b. is not directly connected with or necessary to the management of that site.

must make an appropriate assessment of the implications of the plan or project for that site in view of that site's conservation objectives.

A person applying for any such consent, permission or other authorisation must provide such information as WBC may reasonably require for the purposes of the assessment or to enable it to determine whether an appropriate assessment is required.

WBC must for the purposes of the assessment consult Natural England (NE) and have regard to any representations made by that body. It must also, if it considers it appropriate, take the opinion of the general public, and if it does so, it must take such steps for that purpose as it considers appropriate. In the light of the conclusions of the assessment, and

subject to Regulation 64 (Considerations of overriding public interest), WBC may agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the European site.

In considering whether a plan or project will adversely affect the integrity of the site, WBC must have regard to the manner in which it is proposed to be carried out or to any conditions or restrictions subject to which it proposes that the consent, permission or other authorisation should be given.

2. Stage 1 Screening for Likely Significant Effects

WBC accepts that this proposal is a 'plan or project' which is not directly connected with or necessary to the management of a European Site. The Thames Basin Heaths Special Protection Area (SPA) is a European designated site which affects the borough, and WBC must ensure that development does not result in an adverse impact on the SPA. The potential adverse effects on the integrity of the SPA include recreational activities from inside the SPA and air pollution from inside and outside the SPA.

At this stage WBC cannot rule out 'likely significance effects' on the SPA (alone or in combination with other plans or projects) because the proposal could undermine the Conservation Objectives of these sites. This is because the proposal lies within **3.4 km** of the SPA and:

- represents a net increase in dwellings within 400m - 5km of the Thames Basin Heaths Special Protection Area (SPA) which will lead to an increase in local population and a potential increase in recreational activity on the SPA

As the 'likely significance effects' cannot be ruled out at this stage an Appropriate Assessment must be undertaken.

3. Stage 2 Appropriate Assessment

Based on the information proposed by the applicant, WBC must decide whether or not an adverse effect on site integrity (alone or in combination with other plans or projects) can be ruled out. Mitigation may be able to be provided so that the proposal is altered to avoid or reduce impacts.

The following policies and guidance set out WBC's approach to relevant avoidance and mitigation measures which have been agreed with Natural England. For the majority of housing developments this will comprise the provision of (or contribution towards) Suitable Alternative Natural Greenspace (SANG) and a contribution towards the Strategic Access Management and Monitoring (SAMM) Project. Developers will be required to secure an appropriate financial contribution for the provision of SANG and to the SAMM project through an obligation in a s106 agreement.

For SDL development (and occasionally some other larger non SDL developments) within 5km of the SPA, SANG is required at a minimum of 8 ha per 1,000 new residents, constructed and delivered to Natural England's quality and quantity standards and a contribution towards pan SPA access management and monitoring (as advised by the Thames Basin Heaths Joint Strategic Partnership Board). For SDL development (and occasionally some other larger non SDL developments) between 5 and 7km, the proposals will need to be individually assessed but it is likely that SANG will be required on site in line with Natural England's quality and quantity standards, although the exact requirement will be agreed having regard to evidence supplied.

a. Policies and Guidance

For this proposal the following guidance and policies apply:

- South East Plan (May 2009) Policy NRM6 (Thames Basin Heaths Special Protection Area)
<http://webarchive.nationalarchives.gov.uk/20100528160926/http://www.gos.gov.uk/gos/e/planning/regionalPlanning/815640/>
- Wokingham Borough Core Strategy (2010) Policy CP8 (Thames Basin Heaths Special Protection Area) sets out the approach WBC will take in order to protect the TBH SPA
<https://www.wokingham.gov.uk/sites/wokingham/files/2023-06/Final%20adopted%20Core%20Strategy%20inc.%20cover.pdf>
- Wokingham Borough Core Strategy (2010) Policy CP7 (Biodiversity) sets out the approach WBC will take in order to protect national and international nature conservation sites
<https://www.wokingham.gov.uk/sites/wokingham/files/2023-06/Final%20adopted%20Core%20Strategy%20inc.%20cover.pdf>
- Wokingham Borough Managing Development Delivery Local Plan (2014) Policy TB23 (Biodiversity and Development)
<https://www.wokingham.gov.uk/sites/wokingham/files/2023-06/Adopted%20MDD.pdf>
- Infrastructure Delivery and Contributions SPD (2011)
<https://www.wokingham.gov.uk/sites/wokingham/files/2023-06/Adopted%20Infrastructure%20De~nd%20Contributions%20SPD.pdf>

The project as proposed would not adversely impact on the integrity of the SPA if avoidance and mitigation measures are provided as stipulated by these policies and guidance.

b. SPA Avoidance and Mitigation Measures

i) The provision of Suitable Alternative Natural Greenspace (SANG) and its ongoing maintenance in perpetuity.

In accordance with the development plan, the proposed development will be required to provide alternative land to attract new residents away from the SPA. The term given to this alternative land is Suitable Alternative Natural Greenspace (SANG).

As this development is not part of an SDL, the developer may make a payment contribution towards strategic SANGs in line with schedule below (most likely this will be at Rooks Nest Wood SANG although it is subject to SANGs capacity in the right location within Wokingham borough). An occupation restriction will be included in the Section 106 Agreement in order to ensure that the contribution has been made prior to occupation of the dwellings. This gives the certainty required to satisfy the Habitats Regulations in accordance with South East Plan Policy NRM6 (iii) and Core Strategy Policy CP8

The development will result in a net increase of **1 no dwellings**, broken down as follows: **1 no [Unable to determine]** Depending on the dwelling mix, the level of SANG payments are set out as follows:

No. of bedrooms [Not specified]	SANG Contribution 5km OR 5-7km	Aggregate SANG Contribution
1 bedroom	£1,567.98 or	X x correct amount OR £0

	£423.35	
2 bedrooms	£2,049.59 or £553.39	X x correct amount OR £0
3 bedrooms	£2,690.93 or £726.55	Etc
4 bedrooms	£3,546.86 or £957.65	Etc
5 bedrooms	£4,240.62 or £1,144.97	etc
Total SANG Contribution		[Unable to determine]

[DELETE AS APPROPRIATE]

ii. Strategic Access Management and Monitoring (SAMM) Contribution

The proposed development will also be required to make a contribution towards Strategic Access Management and Monitoring (SAMM). This project funds strategic visitor access management measures on the SPA to mitigate the effects of new development on it.

From 1st April 2023 SAMM contributions have been updated across the 11 Local Authorities affected by the Thames Basin Heaths Special Protection Area. Following engagement with Natural England, the Joint Strategic Partnership Board agreed this change is necessary to ensure sufficient income is raised to cover the costs of the SAMM project in perpetuity. Without this change the SAMM project would be at risk of being unable to deliver the objectives of the SAMM project, and therefore secure positive outcomes for the SPA

The level of contributions are calculated on a per bedroom basis. The application for this development is for **1 no [Not specified] bedroom dwellings**. Depending on the dwelling mix, the level of SAMM payments are calculated as follows:

No. of bedrooms [Not specified]	SAMM Contribution 5km OR 5-7km [DELETE AS APPROPRIATE]	Aggregate SAMM Contribution
1 bedroom	£600.00 or £173.00	X x correct amount OR £0
2 bedrooms	£835.00 or £241.00	X x correct amount OR £0
3 bedrooms	£1,110.00 or £319.00	Etc
4 bedrooms	£1,306.00 or £375.00	Etc
5+ bedrooms	£1,492.00 or £429.00	etc

Total SAMM Contribution	[Unable to determine]
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Prior to the permission being granted the applicant must enter into a Section 106 Agreement based upon the above measures.

4. Conclusion

An Appropriate Assessment has been carried out for this development in accordance with the Habitats Regulations 2017. Without any appropriate avoidance and mitigation measures the Appropriate Assessment concludes that the development is likely to have a significant effect upon the integrity of the SPA with the result that WBC would be required to refuse a planning application.

Provided that the applicant is prepared to make a financial contribution (see above) towards the costs of SPA avoidance and mitigation measures, the application will be in accordance with the SPA mitigation requirements as set out in the relevant policies above.

WBC is convinced, following consultation with Natural England, that the above measures will prevent an adverse effect on the integrity of the SPA. Pursuant to Article 6(3) of the Habitats Directive (Council Directive 92/43/EEC) and Regulation 63(5) of the Conservation of Habitats and Species Regulations (2017) as amended, and permission may be granted.

If the applicant does not agree with the above mitigation and does not enter into a Section 106 Agreement to secure the measures, then the application must be refused using the following reason for refusal.

5. Example Reason for Refusal

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.

Date:	12.10.2026	Signed:	MC
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