

DELEGATED OFFICER REPORT



WOKINGHAM
BOROUGH COUNCIL

Application Number:	250267
Site Address:	31 Barkham Ride, Wokingham, RG40 4EX
Expiry Date:	17 June 2026
Site Visit Date:	11 March 2025
Proposal: Demolition of the existing dwelling and material change of use of land as an extension to Victoria Gardens Residential Park Home Estate for the siting of 31 park homes (permanent C3 use class accommodation) and the construction of an ancillary community building (use class F2(b)) and park office (use class Eg(i))	

PLANNING POLICY	
National Policy	National Planning Policy Framework (NPPF) National Planning Policy Guidance (NPPG)
Core Strategy (CS)	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
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 CC05 – Renewable Energy and Decentralised Energy Networks CC06 – Noise CC07 – Parking CC09 – Development and Flood Risk CC10 – Sustainable Drainage TB05 – Housing Mix TB06 – Development of Private Residential Gardens TB07 – Internal Space Standards TB08 – Open Space, Sport and Recreational Facilities Standards TB12 – Employment Skills Plan TB21 – Landscape Character TB23 – Biodiversity and Development TB25 – Archaeology
Joint Minerals	The JMWP is not relevant to this application site or proposal.

and Waste Plan (JMWP)	
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 SS14 – Sites allocated for residential development, including residential as part of mixed use development SS15 – Securing infrastructure SS17 – Transport improvements CE1 – Design principles for efficient buildings CE3 – Environmental standards for residential development C1 – Active and sustainable transport and accessibility C2 – Mitigation of transport impacts and highway safety and design C3 – Active travel C4 – Green and blue infrastructure and public rights of way C5 – Parking and electric vehicle charging ER4 – Employment and skills plans H1 – Housing mix, density and standards H2 – Presumption against residential losses H3 – Affordable housing H12 – Residential development of existing private gardens H13 – Retention of mobile home parks 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 DH1 – Place making and quality design DH2 – Safeguarding amenity DH6 – Archaeology DH7 – Equestrian development HC1 – Promoting healthy communities HC2 – Community infrastructure HC4 – Open spaces, sports, recreation and play facilities HC5 – Environmental protection HC6 – Air pollution and air quality HC7 – Light pollution HC8 – Noise pollution HC9 – Contaminated land and water HC10 – Odor, fumes and dust
Other	Borough Design Guide Supplementary Planning Document Affordable Housing Supplementary Planning Document Sustainable Design and Construction Supplementary Planning Document Finchampstead Neighbourhood Plan

PLANNING HISTORY		
Application No.	Description	Decision & Date
230791	Outline application for the proposed erection of 26 no. dwellings following demolition of the existing dwelling and garage. (All matters reserved except for access)	Approved 25/09/24

CONSULTATION RESPONSES	
Internal	
WBC Environmental Health – No objection subject to condition WBC Drainage – No objection subject to condition WBC Highways – No objection subject to conditions WBC Growth & Delivery (Planning Policy) – The site already has planning permission for residential development and given this application is still for C3 use, it would not have any impact on the LPU proposed allocation WBC Economic Prosperity & Place (Community Infrastructure) – Financial contribution required towards Affordable Housing and an Employment Skills Plan/ in leui contribution required WBC Landscape and Trees – No objection subject to conditon WBC CIL – Development would not be CIL liable WBC Cleaner and Greener – No comments received WBC Ecology Newts – No objection subject to condition WBC Ecology – No objection subject to condition WBC Waste Services – No comments received	
External	
Natural England – No objection subject to the Appropriate Assessment being passed Thames Water Utilities Ltd – No objection South East Water – No comments received Berkshire Archaeology – No objection subject to condition Binfield Badger Group – Conditions reccomended	

REPRESENTATIONS	
Parish/Town Council	Finchampstead Parish Council raise no objection, however whilst they welcome the reduction in park homes, they feel the density is still too high. <i>Officer comment: This is noted. See report assessment for commentary on density.</i> Barkham Parish Council object to the application due to the proposed high density of development, additional traffic and strain on medical services. The houses that have already been approved should instead be constructed.

	Officer comment: See report assessment for discussion on these matters. However, officers cannot insist that a previous permission be implemented and built out.
Ward Member(s)	No comments received
Neighbours	4 representations (excluding duplicates) have been received in support for the application on the following grounds: • Extending Victoria gardens with more exceptionally well-designed single storey dwellings provide an alternative easy living alternative for our aging population. This in turn releases local housing stock for families to buy. • This development will match the existing neighbourhood scene/skyline and will have a low impact on local traffic and facilities. • The proposal takes into account existing residents Officer comment: These are all noted. However, for the avoidance of doubt the park home extension would not be restricted to older residents. The applicant has submitted this application on the basis that these new park homes could be occupied by anyone, of any age. 4 representations in objection have been received: • The development does not suit adjoining houses need such an unsightly site. • Inappropriate housing density Officer comment: Full assessment on the appearance of the development in the surrounding will be considered in the report. • Inadequate public consultation Officer comment: Article 15 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 (DMPO) prescribes the statutory publicity requirements for planning applications. The LPA are required to notify the public of a planning application by: (i) site display (site notice) in at least one place on or near the land to which the application relates for not less than 21 days; or (ii) by serving the notice on any adjoining owner or occupier The LPA consult adjoining owners or occupiers via letter. 'Adjoining owner/ occupier' is taken to be properties that adjoin/ touch the red line application site boundary. In this case, that would be properties to the east at Victoria Gardens. The application site does not have any other adjoining

	<i>neighbours (to the north, south and west) owing to being located next to Rooks Nest SANG.</i> <i>A site notice was also displayed outside the application site for the benefit of those who would not have received a direct letter. The application was also publicised in the local newspaper.</i> • This application should be assessed at the same time as that for 33 Barkham Ride Officer comment: <i>Reference to the adjoining application at 33 Barkham Ride has been made at various points within the assessment. However, it should be noted that this neighbouring application has been approved, and each application is still required to be assessed on its own merits.</i> • Traffic and safety will be adversely affected Officer comment: <i>See Highways section of the report. The application has been thoroughly assessed by the WBC Highways department.</i> • Screening along Barkham Ride and on Rooks Nest Wood should be conditioned Officer comment: <i>With the exception of one 'U' category tree, all trees along the site frontage boundary are shown to be retained. All are also to be retained alongside the western boundary with Rooks Nest Wood, with the exception of 2 x U category trees and 1 x C category tree. As such, tree removal on these boundaries is minimal (see 'Trees' section of the report for further commentary). Proposed landscaping will also be secured via condition, however landscaping outside of the application site will not be expected/ required.</i> • Potential of further development in the vicinity Officer comment: <i>This is not a material consideration and each application is required to be assessed on its own merits.</i> • Caravans will not meet Wokingham's strategic need for long term family housing Officer comment: <i>See 'Housing Mix' section of the report for discussion on this</i> • Pressure on parking, access, drainage and local services Officer comment: <i>Discussion on parking and drainage are within the report. Officers have not been advised by consultees that mitigation towards local services specifically is required to make the development acceptable.</i>
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	Barkham Village Residents Association has also raised objection as they “do not feel that an extension to the exiting Park Home is appropriate to the area, and that it would be more appropriate to see the houses that were approved on application 230791 built so that they could be sold on a freehold basis and free from the "Park Home" model involving site fees, maintenance charges, and an obligation to sell back to the owner at a discounted price.” Officer comment: The appropriateness of the development in the surrounding will be assessed in the report. Officers are unable to insist/ request that a previous permission is implemented nor is it a planning matter regarding the freehold/ leasehold tenure of properties or associated charges.
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APPRAISAL

Site Description:

31 Barkham Ride presently occupied by a large single dwelling with woodland and tree planting to the boundaries. The site proposed for development encompasses 31 Barkham Ride and an informal area of open space that is connected to Victoria Gardens, a mobile home park, which lies to the east. A fence divides the two. Victoria Gardens is a development of single storey mobile homes (currently 25 homes, plus a sales office and 2 caravans which are stored on the site but not occupied). Beyond that is 33 Barkham Ride which currently comprises of a single large dwelling, however an outline application to re-develop the site for 56 dwellings has been approved (WBC ref: 223528) Immediately to the west of the site is Rooks Nest Country Park which is the Council's strategic SANG. To the north is an area of woodland and to the east of the woodland is Fir Cottage Road and Gilbert Way; residential areas primarily comprising of two storey dwellings.

The site's perimeter is largely well defined by trees and hedgerow. As a result, the site is well contained, with the existing vegetation providing a significant barrier to adjoining land uses and Barkham Ride. However, there is currently some absence of boundary treatment on the eastern elevation with Victoria Gardens so that residents can access the informal open space.

Proposal:

Planning permission is sought for the change of use of the residential curtilage of 31 Barkham Ride for the stationing of 31 park homes. This would form an expansion of Victoria Gardens.

Furthermore, an ancillary community building is proposed (use class F2(b)) and park office (use class Eg(i)). This would be for the benefit of existing and proposed park home residents only.

Park Homes

Before assessing the application, it is important to establish as to whether the park homes amount to operational development (ie establishing if that they are a 'building'), or whether they fall within the definition of a 'caravan'.

Case law has identified three primary factors that should be considered in determining what constitutes a building:

- 1) Size
- 2) Permanence
- 3) Physical attachment to the ground / mobility

Size: With regards to size, plans have been submitted, providing details of this nature. The dimensions are listed below:

Omar Image Mobile home: 12.266 m x 6.117 m. Height: 3.05m

Omar Heritage Mobile home: 15.344 m x 6.116 m. Height: 3.05m

Omar Ikon Mobile home: 13.821 m x 6.117 m. Height: 3.05m

The size of the mobile homes falls within the legal limits of caravan dimensions as provided by the Caravan Sites and Control of Development Act 1968 (as amended 2006).

Permanence: Erection of a building or structure normally denotes the making of a physical change of some permanence. In *Skerrits of Nottingham Ltd v Secretary of State for the Environment, Transport and the Regions (No.2)* [2000] 2 P.L.R. 102 the Court of Appeal upheld an inspector's decision that a marquee erected on a hotel lawn each year for a period of eight months was, due to its dimensions, its permanent character and the secure nature of its anchorage, to be regarded as a building for planning purposes. The annual removal of the marquee did not deprive it of the quality of permanence. Also, permanence was thought to not necessarily mean to continue indefinitely.

The proposed mobile home therefore appears to have an element of permanence because following the case of *Skerrits* "permanence" does not necessarily mean indefinitely. However, there is scope for the mobile home to be moved from the land if it is surplus to requirement and given it would not be connected to the ground.

Physical attachment to the ground: The mobile homes are not physically attached to the ground and are capable of being moved by road from one place to another.

Definition of a Caravan:

Section 13 of the Caravan Sites Act 1968 (as amended 2006) establishes the maximum size of caravans and how they should be composed, constructed and designed. As such it is considered that the applicant has satisfactorily demonstrated that the proposed mobile home accords with the legal definitions of caravans in terms of proposed dimensions and functions. To summarise:

(a) is composed of not more than two sections separately constructed and designed to be assembled on a site by means of bolts, clamps or other devices; **COMPLIES,**

the mobile home would be in the form of two parts that would be assembled on site

(b) is, when assembled, physically capable of being moved by road from one place to another (whether by being towed, or by being transported on a motor vehicle or trailer) **COMPLIES, the mobile home could be transported by road in two parts**

(c) Provides the maximum dimensions of a caravan as:

(a) length (exclusive of any drawbar): 20m

(b) width: 6.8m

(c) overall height of living accommodation (measured internally from the floor at the lowest level to the ceiling at the highest level): 3.05m; **COMPLIES with size requirements**

As such, the mobile homes constitute as a 'caravan' and therefore do not amount to operational development (ie. they are not 'buildings').

However, their stationing results in an intensification of the use of the land for residential purposes and is therefore why this application is required – as it results in a material change of use of the land.

As the mobile home structures do not amount to operation development, assessment on their design and size is limited. Rather, the application has to focus on the acceptability of the material change of use/ intensification of the site for residential purposes only, which this report will now focus on. However, it is acknowledged that the development will result in an increase in residential population, and so implications of this also have to be mitigated.

Principle of Development:

The National Planning Policy Framework has an underlying presumption in favour of sustainable development which is carried through to the local Development Plan. The Managing Development Delivery Local Plan Policy CC01 states that planning applications that accord with the policies in the Development Plan for Wokingham Borough will be approved without delay, unless material considerations indicate otherwise.

a) Principle of development under the development plan

The site is situated within the designated countryside, outside of but adjacent to the settlement of Finchampstead North, which is a Modest Development Location. The site constitutes partly previously developed land.

Core Strategy Policy CP9 (Scale and location of development proposals) directs development to locations within development limits and states that *"The scale of development proposals in Wokingham borough must reflect the existing or proposed levels of facilities and services at or in the location, together with their accessibility"*.

Supporting paragraph 4.52 states that Modest Development Locations *"are those with access to some facilities and services either within them or through good public transport services to major development locations or centres in neighbouring areas e.g.*

Bracknell, Crowthorne and Reading. It is within the development limits of these settlements where modest development would be acceptable.”

Whilst the specific location of the proposal should allow future residents to reasonably utilise the services and infrastructure present in Finchampstead North and higher order settlements via public transport, the site is not located within development limits and therefore the proposal is contrary to Policy CP9.

Development proposals in the designated countryside should be assessed against Core Strategy Policy CP11 (Proposals outside Development Limits). Policy CP11 states that development proposals will not normally be permitted in the countryside except where one or more of the specified exceptions apply:

1) It contributes to diverse and sustainable rural enterprises within the borough, or in the case of other countryside based enterprises and activities, it contributes and/or promotes recreation in, and enjoyment of, the countryside; and

2) It does not lead to excessive encroachment or expansion of development away from the original buildings; and

3) It is contained within suitably located buildings which are appropriate for conversion, or in the case of replacement buildings would bring about environmental improvement; or

4) In the case of residential extensions, does not result in inappropriate increases in the scale, form or footprint of the original building;

5) In the case of replacement dwellings the proposal must:

i) Bring about environmental improvements; or

ii) Not result in inappropriate increases in the scale, form or footprint of the original building.

6) Essential community facilities cannot be accommodated within development limits or through the re-use/replacement of an existing building;

7) Affordable housing on rural exception sites in line with CP9. 3.6 The application proposal does not meet any of these specified exceptions and is therefore contrary to Policy CP11.

The application proposal, both the stationing of the park homes and the ancillary community building, do not meet any of these specified exceptions.

Turning to the overall aim of Policy CP11, this is to protect the separate identity of settlements and maintain the quality of the environment. Regarding the former, the application site is located between Victoria Gardens to the east and Rooks Nest Wood SANG to the west. This is a strategic SANG to be retained as open space in perpetuity and would therefore ensure against the application site's physical coalesce with Arborfield Garrison Strategic Development Location further to the west. The second overarching aim of policy CP11 is to maintain the quality of the environment. This is a

multi-faceted assessment and will encompass a number of material considerations. A final position will be taken within the conclusion of the report.

Overall, should the proposal be deemed to not undermine the intent or overarching aims of policy CP11, it could be acceptable in principle, despite being located outside of settlement limits in the countryside. Furthermore, it should also be noted, and is a material planning consideration, that the majority of the site has already had planning permission granted for 26 dwellings (see planning history - ref. 230791) at the site. As such, the principle of a more intense residential development on the site has already been established and deemed acceptable. Whilst this proposal would also see the creation of an ancillary community building/ office for the park home site its ancillary nature would mean its use would be controlled and restricted to those within Victoria Gardens.

b) Finchampstead Neighbourhood Development Plan (FNDP)

The application site is located within the parish of Finchampstead and therefore the Finchampstead Neighbourhood Plan (formally adopted at Council on 21 September 2023) forms part of the development plan for the area.

The FNDP contains a number of policies on issues including housing; settlement separation; the natural and historic environment; retail facilities; business and commercial development; transport; and design. These inter-relate with other material considerations which are to be discussed.

Section 5.3 of the Finchampstead Neighbourhood Development Plan notes and supports the proposed allocations within RGS (discussed below) located within the parish. This includes the proposed allocation of 31-33 Barkham Ride for 66 dwellings (net increase).

c) Principle of development under the emerging policy

The Local Plan Update (LPU), the plan which will supersede the adopted Core Strategy and MDD local plans, is at Regulation 22 stage as it has been submitted to the Planning Inspectorate for examination. As per paragraph 49 of the NPPF:

Local planning authorities may give weight to relevant policies in emerging plans according to:

a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);

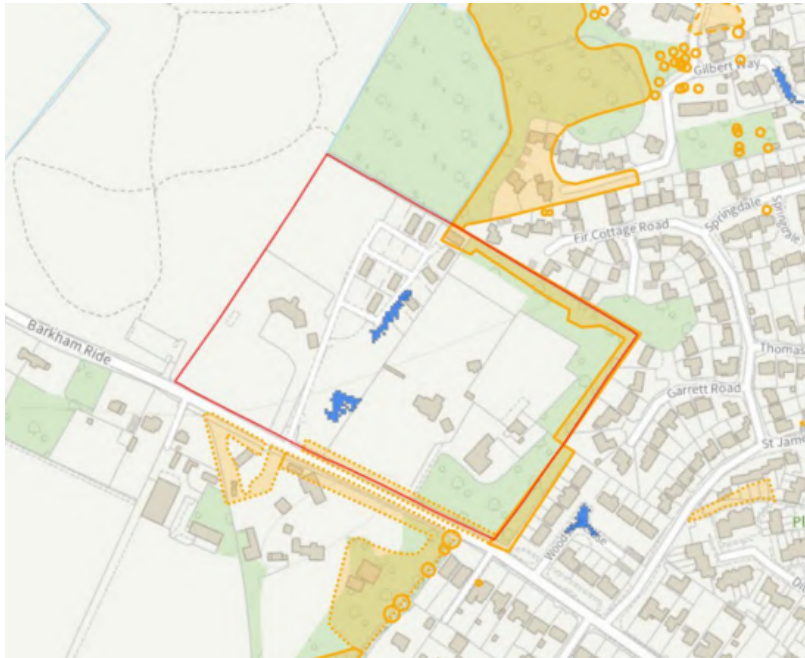
b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and

c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given)

As a whole, the LPU is still given limited weight, despite its advance stage of preparation. This is owing to unresolved objections to a great number of the policies

contained within it. However, those policies highlighted in **yellow** in the policy table earlier in this report are those that have received less objection and therefore are considered by Officers to individually hold moderate weight in the determination of this application. All the others hold limited weight. The policies that hold moderate weight will feed into/ be considered in their relevant sections in this report.

It should be noted that the application site, combined with 33 Barkham Ride, is allocated for residential development within policy SS14 (site SS14.6) of the Local Plan Update for approximately 80 dwellings:



Planning permission has been granted for 56 dwellings at 33 Barkham Ride (app ref. 223528). This number, in combination with this proposal, would see a total dwelling quantum of 87. It had been established under previous application 230791 and 223528 by the Planning Policy team that this amount of dwellings was envisaged above the number at the existing Victoria Gardens.

Supporting paragraph 5.116 of the LPU, does however, state that *'The number of dwellings is 'indicative' and does not represent a fixed requirement for each site'*. An assessment of the proposal will be made, that will consider density and the acceptability of this quantum of development. The WBC Planning policy team raise no objection to the proposal as although this scheme is for park homes, it would still be a C3 residential use and therefore would not conflict with the site allocation.

d) Housing land supply position and the 'tilted balance'

The latest published assessment of housing land supply concluded a deliverable supply of 2.5 years as of 31st March 2025.

The National Planning Policy Framework (NPPF) states under paragraph 11 that where a local authority is unable to demonstrate a five-year supply of deliverable housing sites, the most important policies relating to the application may be viewed as being out of date. It continues to advise that unless there are specific policies in the NPPF

protecting the land subject to the application, that permission should be granted unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the NPPF as a whole, 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.

Whilst the park homes are not operational development, they will still result in a C3 use accommodation when stationed. Furthermore, appeal decisions within the borough such as APP/X0360/W/24/3356397 for the change of use of the land for stationing of 9no. mobile homes for permanent residential use, confirmed that the provisions of para 11(d) do apply in the absence of a 5YHLS. This was despite the application being for the material change of use of the land for stationing of caravans only, rather than the physical structures.

As discussed above, paragraph 11(d) of the NPPF is engaged due to the Council being unable to deliver a 5-year housing land supply. Within paragraph 14 of the NPPF it acknowledges the relationship between paragraph 11(d) and those areas that have an adopted Neighbourhood Plan, which is the case in Finchampstead. It states

In situations where the presumption (at paragraph 11d) applies to applications involving the provision of housing, the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits, provided the following apply:

- a) the neighbourhood plan became part of the development plan five years or less before the date on which the decision is made; and*
- b) the neighbourhood plan contains policies and allocations to meet its identified housing requirement*

In this instance, paragraph 14 of the NPPF is not engaged as whilst the Neighbourhood Plan became part of the Wokingham development plan within the last five years, the neighbourhood plan does not explicitly contain allocations to meet an identified housing requirement. Rather it notes and supports, at section 5.3, the proposed allocations located in Finchampstead Parish contained within the emerging LPU (as per the most recent consultation, being the RGS) which includes 31-33 Barkham Ride.

As such, para 14 of the NPPF is not engaged and therefore any harm identified with the proposal will not be weighted to 'significantly and demonstrably' outweigh the benefits as a result of the Neighbourhood Plan. However, a full assessment taking paragraph 11(d) of the NPPF into account will be made.

Paragraph 84 of the NPPF seeks to avoid new isolated homes in the countryside unless there are special circumstances such as a rural worker's dwelling, optimal viable use of a heritage asset, reuse of redundant or disused buildings, and subdivision of an existing building or if the building is of exceptional design. The site is located adjacent to settlement limits, including large amounts of residential dwellings on partially previously developed land. As such, the proposal will not result in isolated new dwellings and will comply with paragraph 84 of the NPPF.

e) Loss of the existing dwellinghouse, residential garden and informal open space for Victoria Gardens

The single dwelling which would be demolished is of little architectural value and therefore its demolition as a result of the proposal is not resisted in principle. Policy CP3 of the Core Strategy notes that loss of dwellings will not be supported, however in this case whilst there would be a net gain of 30 dwellings.

Policy TB06 of the MDD states that development of private residential gardens will be accepted where:

a) The proposal makes a positive contribution to the character of the area in terms of:
i. The relationship of the existing built form and spaces around buildings within the surrounding area;

ii. A layout which integrates with the surrounding area with regard to the built up coverage of each plot, building line(s), rhythm of plot frontages, parking areas, and iii. Existing pattern of openings and boundary treatments on the site frontage

iv. Providing appropriate hard and soft landscaping, particularly at site boundaries

v. Compatibility with the general building height within the surrounding area

vi. The materials and elevational detail are of high quality, and where appropriate distinctive and/ or complementary

b) The application site provides a site of adequate size and dimensions to accommodate the development proposed in terms of the setting and spacing around buildings, amenity space, landscaping and space for access roads and parking

c) The proposal includes access, which meets appropriate highway standards

d) The proposal does not lead to unacceptable tandem development

e) The design and layout minimises exposure of existing private boundaries to public areas and avoids the need for additional physical security measures

Many of the above matters relate to other material considerations that will be discussed later in this report. However, the existence of Policy TB06 inherently supports the development of private residential gardens in principle, subject to these wider criteria being met. This is echoed by policy D3 of the Finchampstead Neighbourhood Plan.

In terms of the loss of informal open space for residents of Victoria Gardens, this open space is not designated nor has been formally secured for residents via the planning process. As such, in planning terms, access to this open space could be restricted for resident usage at any time and therefore does not constitute a reason to resist the development of the land in principle. It is also not open space that is accessible to the wider public. As part of this scheme, a community centre is proposed that will form as a formalised communal space for the residents of Victoria Gardens (current and future residents).

f) Principle of ancillary community facility/ office

The NPPF discusses the importance of community facilities in place making. Whilst this scheme would see a community space for proposed and existing residents of Victoria Gardens, it would be a facility solely for their use, as opposed to the wider

community. Given the proposal is for an ancillary community space, the assessment and principle of this is accepted given its direct relationship to the park home expansion. Had the proposal seen a non-ancillary community facility be proposed, a different assessment of this element of the scheme would have been undertaken by officers.

g) Conclusion on principle of development

The application proposal is located within the designated countryside, but in close proximity to the development limits of Finchampstead North. The proposed development does not satisfy any of the exceptions set out in Policy CP11 concerning development beyond development limits in countryside locations. The application is thereby contrary to these aspects of the development plan. However, attention then has to turn to whether the proposal undermines the intent of policy CP11 and its overarching aims. This will be concluded at the end of this report.

By virtue of the council's current housing land supply position, the presumption in favour of sustainable development set out in the NPPF at paragraph 11 is now engaged in the decision-making process, whereas paragraph 14 is not. Accordingly, an assessment will need to be made of whether any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole (the tilted balance).

This balancing exercise will be undertaken in context of past over supply, which acts to temper the weight to be attached to the benefits of additional housing in the tilted balance, or in this case, the change of use of land that would facilitate more residential homes.

It is noted that the proposed development is situated where future occupiers would have a degree of access to services and facilities within a modest development location and higher order settlements via public transport. The application site has also importantly already been granted permission for a more intense residential development (ref. 230791) and so these also weigh in favour of the principle of development for this scheme.

Housing Mix

Policy CP5 of the Core Strategy states that Planning permission will be granted for residential development providing a mix and balance of densities, dwelling types, tenures and sizes.

It is acknowledged that the proposal would not result in any accommodation mix as all mobile homes would be 2 bedroom. However, as the residential accommodation would all be park homes, which are of a general standard size (to meet the definition of a caravan), there is not great scope to have a great variety of size dwellings. Therefore, in this specific circumstance, the application would not be resisted based on lack of housing mix. The dwellings would still be C3 permanent residential accommodation that would contribute towards the borough's housing land supply.

Housing Affordability

Policy CP5 of the Core Strategy states that affordable housing must reflect the sizes and types that meet the proven needs of people who are not able to compete in the general housing market.

The threshold for affordable housing is 5 dwellings or more (net) for residential sites of 0.16 hectares (net) or larger. The site exceeds this threshold and therefore there is a requirement for the provision of affordable housing.

To meet the requirements of Policy CP5 of the Core Strategy, a minimum of 40% of the total number of units (net) should be provided as affordable housing. This equates to 12 dwellings of the proposed.

Upon consultation with the WBC Housing team, they advise that due to the site location and nature of the park homes, the practical means of delivery for the affordable housing is through a commuted sum. The calculation of the commuted sum, in accordance with the Affordable Housing SPD, has been calculated as £1,385,730.58 index-linked towards affordable housing in the borough. This will be secured via a S106 planning obligation.

Impact on Landscape/ Character of the Area:

Policy TB21 of the MDD 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. In addition, proposals shall retain or enhance the condition, character and features that contribute to the landscape.

Policy CC02 of the MDD states that planning permission for proposals at the edge of settlements will only be granted where they can demonstrate that the development, including boundary treatments, is within development limits and respects the transition between the built-up area and the open countryside by taking account of the character of the adjacent countryside and landscape.

Policy D2 of the FNDP states that proposals should be located and designed to maintain the separation of settlements and to complement the characteristics of the landscape in the immediate locality.

The site is located in landscape character area (LCA) M1 Finchampstead Forested and Settled Sands which is a high-quality landscape with moderate sensitivity and a low capacity for change. The character area stretches from Crowthorne in the east and just beyond the site at Rooks Nest in the west. The M1 LCA is characterised by large swathes of interconnected forestry and woodland which dominates the area over farmland, although just beyond Rooks Nest the reverse is true and farmland of fields and hedgerow dominates.

The 'rides' are a distinctive feature of the M1 character being created through the Royal Forest of Windsor in the 18th century and impart a strong linear character to the landscape and have provided the framework for a strong settlement character of low density, mostly detached dwellings lining the rides and within the settlement area some areas of more post-war suburban development of unremarkable character.

The M1 LCA is accessible for recreation with parks and open spaces connected by a network of footpaths and bridleways. The landscape is highly enclosed except for views along the rides that are framed by mature Oak trees, many of which are protected and highly valued in the landscape and includes some Veteran trees.

The settlement pattern of low-density dwellings in large plots along the rides and notably occasional wooded gaps between areas of settlement, integration of development in the wooded landscape and absence of commercial or industrial buildings and structures, and a sense of tranquillity and remoteness are noted as a 'Valuable Landscape Attributes' of the M1 LCA.

The key issues affecting the M1 LCA include landscape issues affected by climate and woodland management. Development issues concern is pressure for new residential development inside and outside the area that impact the landscape character along with continued pressure for settlement expansion, infill and densification within the existing settlements leading to habitat loss. In addition, pressure for backland development, and the inevitable continued pressure for new roads and road improvement and resulting increase in traffic generated by increase in development affects the tranquillity of the area and impacts on the landscape to the south of Wokingham where the landscape provides tranquil and distinct gaps, and breathing spaces of rural character against settlement creep between increasing suburbanisation.

The Landscape Strategy for the M1 LCA is to conserve and enhance existing character. 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 Landscape Guidelines for the M1 LCA include; Conserve and enhance the integration of urban edges through wooded boundaries and large-species trees and maintain the important vistas along rides. Enhance sense of place through careful planning and design (including siting, massing, scale, materials and landscape – and sensitive lighting to retain dark skies at night) to minimise the impacts of any potential new development and particularly vertical elements on valuable landscape attributes.

Submitted Landscape and Visual Impact Assessment

The applicant, in their LVIA considers the proposal would have a short term moderately adverse landscape impact. However, subject to new appropriate landscaping, there would be a long-term beneficial landscape impact.

The site is thought to be of moderate sensitivity with a low capacity for change. As previously mentioned, the Landscape Strategy for M1 LCA is to conserve and enhance the existing character such as forestry and woodland, the rural setting and gaps between settlements. The Officer view is that the proposal is on a brownfield site with an existing landscape framework to most of the boundaries that creates a sense of enclosure. These treelined boundaries are shown to be retained and enhanced. The visual receptors are identified as being users of the footpath on Barkham Ride, users of the country park and roads users in the vicinity and the development could suitably integrate within the wider landscape, and not be detrimental to the wider landscape, given its containment, with the provision and securing of landscape buffering to reduce the prominence of the development but provide landscaping to contribute and enhance the surrounding countryside. Boundary treatment would be secured via condition.

Site Layout

Policy TB06 states that development within residential gardens should:

a) The proposal makes a positive contribution to the character of the area in terms of:

- i. The relationship of the existing built form and spaces around buildings within the surrounding area;*
- ii. A layout which integrates with the surrounding area with regard to the built up coverage of each plot, building line(s), rhythm of plot frontages, parking areas, and*
- iii. Existing pattern of openings and boundary treatments on the site frontage*
- iv. Providing appropriate hard and soft landscaping, particularly at site boundaries*
- v. Compatibility with the general building height within the surrounding area*
- vi. The materials and elevational detail are of high quality, and where appropriate distinctive and/ or complementary*

b) The application site provides a site of adequate size and dimensions to accommodate the development proposed in terms of the setting and spacing around buildings, amenity space, landscaping and space for access roads and parking

c) The proposal includes access, which meets appropriate highway standards

d) The proposal does not lead to unacceptable tandem development

e) The design and layout minimises exposure of existing private boundaries to public areas and avoids the need for additional physical security measures

Policy D1 and D3 of the Finchampstead Neighbourhood Plan echoes a number of the above.

Policy CP3 states Are of an appropriate scale of activity, mass, layout, built form, height, materials and character to the area together with a high quality of design.

The Wokingham Borough Design Guide (2012) contains an array of design policies.

This development would see the new settlement edge owing to Rooks Nest being located to the west. Policy CC02 states that development at the edge of settlements is acceptable where it is demonstrated that it is within development limits and respects the transition between the built-up area and the open countryside by taking account of the character of the adjacent countryside and landscape.

RD9 of the Borough Design Guide states that “the location, siting and design of new development on the edge of settlements must be carefully designed to:

- 1) create an edge to the built up area with a character that relates to the local pattern; and*
- 2) incorporate soft landscape to soften the edge of settlements and to help integrate new housing into its rural setting”*

To support point 1, Officers are mindful that as development is located within the countryside (and will be adjacent to countryside), a suitable density of dwellings is expected to highlight a natural transition from built form to rural landscape. Policy R10 of the Borough Design Guide 2012 says that an assessment of an appropriate density must be design led as well as considering the number of units per hectare to ensure that the development related well to local character.

When looking at surrounding residential development on the eastern boundary of the site, is Victoria Gardens which equates to 16.06 dwellings per hectare (or 24.27 dwellings per hectare if the informal open space on site was removed). Beyond that, to the east is the permitted residential scheme at 33 Barkham Ride, which, if implemented, would equate to 19.3 dwellings per hectare. To the north, dwellings in Fir Cottage Road equate to approximately 18 dwellings per hectare. There are no residential developments to the east of the site, owing to the Rooks Nest Wood SANG. The density of the scheme equates to 20.6. The density is therefore slightly above those immediately surrounding the site, however not out of proportion by an abnormal substantial degree to appear overly dense to of detriment to the character and appearance of the surrounding area or countryside. The site's containment also minimises harmful visual disturbance to the wider area.

Turning to point 2, the submitted site layout took achieves a suitable layout of the site in relation to the western boundary which adjoins Rooks Nest Country Park (SANG) to help create a soft landscape for the edge of settlement. The layout sees seeing park homes on the western elevation being side on Rooks Nest Country Park SANG and at a distance of approx. 10m away, creating a buffer with the site boundary.

Moving away from the western elevation, park homes are proposed to be side onto the northern boundary. Initially there was concern that this would have an adverse impact on the adjacent woodland which is defined as a priority habitat. However, physical development is situated in excess of 15m from the woodland (excluding rear garden space) and therefore the concern was withdrawn as this is a suitable separation distance. Again, a landscape buffer is created on this northern boundary.

During the course of the application, 4 park home units have been removed from the scheme, which has enabled a green link roughly through the centre of the site including a garden in the resident's community space, and a pocket park which will enhance the view from Victoria Gardens.

At the west side of the entrance, the layout has been enhanced with an area of native woodland and scrub planting with native feathered trees which will enhance views from Victoria Gardens as well as the entrance into the western side of the park. The space around mature tree T47 has been enhanced with the same type of planting which leads the eye naturally towards the western boundary and blends in with the character of this part of Barkham Ride and Rooks Nest public open space.

When looking at the development in the context of the Barkham Ride street scene, park homes are to be set back from the frontage to once again allow for a landscape buffer on the southern elevation which is appropriate given the settlement edge with the countryside. The single storey nature of the park homes mean that their bulk and scale would be reduced (compared to the previously approved two storey dwellings) and would assimilate with the other park homes on site. The proposed community facility has also been sensitively designed; again being single storey and positioned centrally within the development to foster community cohesion.

Within the site layout, there are opportunities for landscape buffers between rear gardens and the road, and spaces for parking and is positive to break up areas of hardstanding given the countryside location.

Overall, whilst a slightly denser scheme than the previous approved application at the site, there are positive elements within the site layout that mean it has the opportunity to suitably assimilate into the area and landscape. The high degree of containment of the site also allows for a development that will generally not have long-reaching or harmful effects on the setting, character or appearance of the area.

Public Open Space:

Policy TB08 of the MDD outlines the public open space standards required for new residential development.

Whilst public open space is a factor in a landscape led scheme and design, public open space is required for designated recreation and other purposes.

No response was received from the Green Infrastructure Team regarding whether this scheme should provide for on-site or off-site public open space provision. However, as part of the previous application (230791) it was agreed that an off-site contribution would be more appropriate given the size of the scheme. Given this scheme is only a small increase in terms of accommodation numbers, the same approach has been taken in the absence of information to the contrary. A total off-site contribution towards Public Open Space of £327,605.33 will be secured via a S106 legal obligation which will be put towards the different open space typologies outlined in policy TB08.

Although a community facility is proposed, this is not considered to be truly civic space as it will not be accessible for the general public (only residents of Victoria Gradens), and therefore cannot be used to offset the contribution towards civic space required under policy TB08.

Living conditions

Whilst the size of the park homes themselves cannot be assessed, so cannot against the borough's space standards for dwellings under policy TB07 (as the park homes do not amount to operational development), Officers can see that each will be provided with good natural light from the presence of windows in habitable spaces. However, the general layout and size of rooms within the proposed Park Homes represents the generic arrangement for this type of accommodation.

In terms of external amenity space R16 of the Borough Design Guide states that the Council's minimum garden length of 11m is a generally accepted guideline for private garden space, provided the space is usable.

The amenity space for each mobile home is situated around the home and are not divided by way of boundary treatment. As such, they would not have a depth of 11m and would not strictly be private by way of boundary treatment. However, there is sufficient space for basic recreation (ie. table and chairs) and clothes drying. This would be a similar arrangement to the existing park home site.

In terms of boundary treatment, the LVIA states that residents use a variety of resources such as low fencing, hedging, trellis, pot plants, pergolas and sunshades to form and delineate individual defensible spaces. None are indicated on the proposed plans. However, in visual terms, officers do note that an abundance of formalised boundary treatment between each plot could appear bulky and jarring. As such, officers

are accepting the absence of formal boundary treatment between plots in this specific instance, and indeed it is not an unusual circumstance on park home sites.

Neighbouring Amenity:

Policy CP3 of the Core Strategy states that development should not be of detriment to adjoining land users. Policies within the Borough Design Guide (BDG) concentrate on standards of accommodation for future occupiers of residential development.

Overbearing

The proposal will see an extension to the existing mobile home park. The closest proposed mobile homes would be located in parallel to those on the existing park, creating some front-front, front-back and front-front relationships between the new and existing mobile homes. The Borough Design Guide, in R15 and R16.

Front-to-front separation distances generally comply or slightly exceed 10m, as specified in the BDG. Furthermore, they are separated by the internal estate road.

Flank-to-flank and front-back relationships also exceed 10m, with this specific relationship not specified in the BDG or an indication of an acceptable distance given. In light of the single storey built form, and again being separated by the internal access road, this is acceptable.

In summary, owing to the existing and proposed mobile homes being of a comparable scale and all single storey, coupled with the internal estate road dividing the new and existing homes, the proposed arrangement of the new mobile homes would not result in harmful overbearing impacts to existing occupiers.

The layout and orientation of the new mobile homes mean they would also not be overbearing on one another or for future occupiers.

Overlooking:

Owing to the acceptable separation distances, overlooking between residential plots would be acceptable. The new mobile homes would be arranged in a similar layout to the existing. Whilst there will always be a degree of overlooking in residential areas, particularly to amenity spaces, the proposal is not considered to result in substantial impact in this regard.

Loss of Light:

Whilst the new mobile homes would eradicate the current area of open space on the existing mobile home park (and the rear garden of 31 Barkham Ride), the arrangement would not result in such a close relationship to existing properties that would substantially reduce their access to natural light. This is also owing to the new mobile homes being single storey.

Highway Access and Parking Provision:

Policy CP6 of the Core Strategy seeks to manage travel demand with sustainable travel modes, appropriate vehicle parking and minimisation of traffic impacts and highway safety concerns. Policy CC07 and Appendix 2 of the MDD Local Plan set out the minimum parking requirements for development proposals. Policy CP9 states that the scale of development must reflect the existing and proposed levels of facilities, services

and accessibility at or in the location. Policy C5 of the LPU states that development proposals should provide and retain vehicle parking (including motorcycles) and cycle parking that caters for the needs of all users (including people with disabilities and visitors) that is appropriate to the location and the scale of development.

The scheme has been assessed by WBC Highways.

Site Sustainability

Paragraph 109 of the NPPF acknowledges that opportunities to maximise sustainable transport solutions will vary between urban and rural areas.

Policy CP6 of the Core Strategy states that 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;
- c) Improve the existing infrastructure network, including road, rail and public transport, enhance facilities for pedestrians and cyclists, including provision for those with reduced mobility, and other users;

The appropriateness of the site for residential development in relation to key sustainable transport modes will now be assessed.

Walking

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.

There is a pedestrian footway on the northern side of Barkham Ride adjacent to the site. The footway provides a link to the centre of Finchampstead to the south, with a footway on the southern side also provided beyond the start of the current 30mph speed limit. The access to the proposed development site lies outside the 30mph limit on Barkham Ride within the 40mph limit. Due to the increased development on Barkham Ride, a contribution of upto £6500 to fund the extension of the 30mph speed limit to the boundary with Barkham is requested and has been agreed by the applicant. This will be secured via a S106 obligation.

There are several local facilities including shops and schools that would fall within acceptable walking and cycling distances.

It is acknowledged that some of the walking times to nearby facilities are above 10 minutes, however not considerably, and not to a degree that would mean the site is wholly unsustainable for walking to nearby facilities. Furthermore, the site would be no less sustainable in this regard than other peripheral parts of the Modest Development Location.

Buses

The supporting text to policy CP6 of the Core Strategy sets out the requirement of a good bus service:

- a) At least a thirty-minute service frequency during peak times (7:00 to 9:00 and 16:00 to 19:00 Monday to Saturday); and*
- b) At least an hourly service frequency during off-peak hours (9:00 to 16:00 and 19:00 to 22:00 Monday to Saturday and between 7:00 and 22:00 on Sundays).*

Bus stops are located on the eastbound side of Barkham Ride, close to St. James Road and Woodside Close. The Number 3 Leopard service (part funded by Arborfield Bus Strategy) operates along Barkham Ride running between Reading, Arborfield and Wokingham. There is typically an hourly service during weekdays and Saturday with no services running to Wokingham on a Sunday and Bank Holidays.

It is acknowledged that the bus service does not meet the criteria set out above and cannot be considered as a 'good service'. There is no 30-minute frequency during peak there are no services on Sundays. However, the proposal will make a contribution towards improved bus services as part of Arborfield bus strategy at a contribution of £1,228.81 per park home. This will be secured via a S106 obligation and will help improve the site's sustainability in terms of providing a greater provision of public transport.

Cycling

Barkham Ride is a relatively straight road and therefore is deemed suitable for the principle of cycling. It is noted that approximately 500m to the east, cyclists from the development would link to the established Cycle Network when travelling to Wokingham Town Centre. MyJourney, a borough wide sustainable travel campaign, has produced a Wokingham Borough cycle network. Travelling west, the Cycle Network would be connected at Commonfield Lane, which again is considered a suitable distance from the site of approximately 1500m. These distances are considered acceptable for cyclists to travel before they will be connected to established/ optimum routes.

A contribution of £643 per park home towards My Journey will be secured unless a travel plan is provided. This will be secured via a S106 obligation. A travel plan is a long-term strategy which aims to encourage people to use alternatives to private vehicle. My Journey is a Wokingham boroughwide active and sustainable travel campaign that aims to help Wokingham residents to travel by alternative more sustainable modes. Through the travel plan or contribution towards My Journey, this will help promote sustainable transport modes.

Summary on sustainability

There are day-to-day facilities and services within proximity of the site. While some alternative transport modes are not optimal and below standards at present, it would offer some realistic options to some residents of the proposed development and through conditions and contributions, the sustainability of the site would improve.

Vehicle Parking

According to WBC Parking Standards, 0.2 visitor space shall be provided per dwelling, so that a minimum of 6 visitor parking spaces are required for the reduced numbers of park homes.

The applicant has confirmed that the community centre will remain ancillary to the residential homes on 8th September 2025, therefore the proposed 6 parking spaces for adjacent to the community centre will be served as visitor parking.

While the Highways would prefer visitor parking to be evenly distributed through the site, those provisions can be acceptable for this instance.

Cycle Parking

A cycle storage locker of dimensions 1.9m x 0.9m x 1.4m will be provided per Park home. The proposed locker is sufficient to store one bike, which is acceptable.

Four spaces (two Sheffield stands) are proposed for the community centre, which is welcomed.

Electric Vehicle Charging

The EVCP of each park home has been indicated on the proposed site plan. This may be subject to further authorisation via Building Control.

Trip Rates and access

The revised trip rates in the technical note are consistent with the agreed trip rates in 230791. However, with reduced numbers of park homes (initially the scheme was for 35 and now is for 31), this results in 16 two-way trips in the AM and PM peak, which is equivalent to an additional 2 two-way trips over those for the approved scheme. There would be little impact on the highway network caused by the proposed level of trips from this development.

The existing access to 31 Barkham Ride will be stopped up and the existing access to Victoria Gardens utilised.

Internal Road and Swept Path Assessments

Swept paths assessments have been updated based on the latest site plan and a swept path for a refuse vehicle (in anticlockwise direction) has been assessed. Acceptable swept paths have been provided for a large saloon car and a rigid vehicle for construction stage.

The applicant has confirmed the internal access roads will serve one-way traffic and revised the swept paths to travel in the proposed direction to the proposed one-way traffic. The applicant has provided the detailed design of internal access roads in including all necessary road markings and signages in this proposal.

Servicing Management Plan is suggesting that goods deliveries must be pre-arranged with the park manager, and only permitted via smaller LGVs, which will mirror the existing arrangement of the adjoining site to the east.

The applicant has clarified the size limits for the permitted LGVs to be 6.7m long x 2.3m wide. WBC Highways can accept the swept path for refuse vehicle to be served as a proxy of other LGVs for future delivery and servicing vehicle.

A S106 obligation will be secured to ensure that internal site roads are properly managed. The roads will be required to be built to Council adoptable standards. If the site road is to remain private, the legal agreement will secure details of management company set up to look after the maintenance of the road, level of money set aside for maintenance, alongside the Borough's inspection fee and the APC bond.

If the site roads are to be adopted, these would need to be delivered through s38 agreement with the Borough. The Borough would also require agreement on inspection fees and commuted sums. The adoption plans, fees and commuted sums would need to be included in the s106 agreement. Notwithstanding, it has been indicated by the applicant that roads will remain in private ownership.

Framework Construction Management Plan

The applicant has submitted a framework Construction Method Statement along with the planning application. It is confirmed that deliveries will be limited to be Monday to Friday 09:00 to 17:00, within the working hours to avoid the peak hours of the highways network, which is welcomed. The Highways advise deliveries also to be carried out outside school entry and exit times, whenever possible. The largest construction vehicle proposed is 16.5m long large articulated HGV.

The mobile home units will be delivered in two halves and some of the mobile home units will be transported by the 16.5m long articulated vehicles, then being towed into the final position using a 4x4 vehicle. The applicant has clarified the proposed unloading and built out arrangements of the site. Given mobile homes will be built out from the rear of the park to the front, WBC Highways can accept that there will be sufficient manoeuvring spaces for a 4 x 4 vehicle to tow the mobile home.

Drawing No. 2401002-TK105 (Rev. A) has demonstrated the swept path for the proposed articulated vehicle reversing into the site and leaving the site in forward gear. It is confirmed that reversing into the park through support from banksmen, which is acceptable.

The proposed unloading area of articulated vehicle is shown which the articulated vehicle would stop along the central spine road to unload the mobile home and be relocated into position. It is confirmed that mobile units will not be stored along the central spine road and will be towed into the final position after being unloaded, which is acceptable.

The applicant also provides management details on the proposed temporary alteration of the one-way system of the eastern parcel in CMS V6.

Overall, the proposed layout has demonstrated that the proposed access for the development is accepted and the additional vehicle movements to and from the site can be accommodated in the established highway network. Like the previous approval at this site for 26 dwellings, no concerns have been raised here regarding cumulative

impacts with the approved scheme on the adjacent site at no. 33 Barkham Ride for 56 dwellings, or any other surrounding development.

However, WBC Highways recommend the following conditions which will be attached to the permission:

- Parking and turning to be implemented as approved
- Cycle parking to be implemented as approved
- Details of visibility splays for private drives
- Stopping up of existing access
- Submission of a construction method statement
- Highway construction details
- Details of external lighting
- Parking management strategy
- Delivery and servicing plan
- Walking and cycling strategy
- Hours of work during construction phase

Flooding and Drainage:

Policy CC09 of the MDD states that All sources of flood risk, including historic flooding, must be taken into account at all stages and to the appropriate degree at all levels in the planning application process to avoid inappropriate development in areas at risk of flooding.

Policy CC10 of the MDD states that all development proposals must ensure surface water arising from the proposed development including taking into account climate change is managed in a sustainable manner. This must be demonstrated through a) A Flood Risk Assessment, or b) Through a Surface Water Drainage Strategy.

The site and access thereto is in Flood Zone 1 which is defined as land having a less than 1 in 1000 annual probability of river flooding or tidal flooding in any given year meaning its probability of flooding is 'low'.

Sequential and Exception Test

The proposal represents a 'Highly Vulnerable' development (according to the NPPF's flood risk vulnerability classification) within flood zone 1.

The PPG advises that changes of use can increase the vulnerability of a site and that site-specific flood risk assessments should therefore be undertaken where appropriate. The NPPF advises that the sequential test does not need to be undertaken for change of use applications *"except for changes of use to a caravan, camping or chalet site, or to a mobile home or park home site, where the sequential and exception tests should be applied as appropriate."*

In this case, a park home site is proposed and as such a sequential test is required as per the above. However, the NPPF notes that the *"sequential and exception tests should be applied as appropriate"* (footnote 63). In this case the site is already located within flood zone 1 and so sequentially cannot be located in a zone which is less risk of flooding. As such, when applying this proportionate approach, as indicated by

footnote 63, the development is considered to not require a full sequential test, as the application site would either equal or surpass any other site brought forward as part of the test.

As per table 2 of the PPG which details flood risk vulnerability and flood zone 'incompatibility', a 'highly vulnerable' development within flood zone 1 does not require an exception test.

Sustainable Drainage Systems - Surface water

The NPPG (Paragraph: 056 Reference ID: 7-056-20220825) states that the aim should be to discharge surface water run-off as high up the drainage hierarchy as reasonably practicable. This is as follows:

1. into the ground (infiltration);
2. to a surface water body;
3. to a surface water sewer, highway drain, or another drainage system;
4. to a combined sewer.

Discharging to a surface water body has been sequentially determined through the applicant's drainage assessment. Discharging surface water to the ground was then discounted as percolation testing revealed that due to the presence of London Clay, the ground is unsuitable for infiltration techniques. As such, it is proposed to drainage surface water through the use of a box culvert and an attenuation pond to the north of the site (which is classified as an ordinary watercourse) which will eventually drain into a ditch on the northern boundary. This has been deemed acceptable by WBC Drainage officers, subject to a condition requiring a detailed drainage design to be secured via condition. This will include assessment of the ditch capacity and evidence of ordinary water consent. Furthermore, a condition will be attached requiring a long-term management and maintenance plan for all SuDS which is to be submitted and approved prior to occupation of the park homes.

Foul drainage

Foul drainage from the proposed development will be discharged to the Thames Water sewer running along the northern boundary of the site.

Thames Water, in their initial consultation response, highlighted that they had an inability to accommodate the development in terms of sewage treatment works infrastructure, and recommended a condition to deal with this matter. However, upon re-consultation for the scheme, this was no longer raised as a point of issue, and overall no objection to the proposal was raised, and no conditions requested. As such, Officers have proceeded on the basis that capacity is now available. Separate consent between the applicant and Thames Water will be required to connect to the network.

Trees:

Policy CC03 of the MDD seeks to protect existing trees and promote opportunities for new soft landscaping.

Policy IRS6 of the Finchampstead Neighbourhood Plan states that development proposals should seek to retain mature or important trees, groups of trees or woodland

on site. If trees are to be removed, a similar replacement should be provided in terms of local species and keeping with the character of the area.

The trees are the key characteristic of the site being mature native trees mostly confined to the site boundaries, particularly to the western and southern boundaries. They include several 'A' quality Oaks, groups of Lombardy Poplars 'B' quality, an off-site woodland to the north that influences the site character and several individual and groups of trees. The trees contribute to the screening of the site from Rooks Nest Farm, and Barkham Ride.

24 trees are to be removed to facilitate this proposal. Five of these are poor quality (category U), and nine of low quality (category C). All of these trees have been approved for removal within the previous application for residential development at the site.

The remaining 9 trees to be removed are within a group and are also category C. The trees also are compatible with the proposed site layout. No objection is raised by the WBC Tree & Landscaping Officer regarding their removal.

During the course of the application, revisions to the proposed layout were made for the benefit of T47. This tree is a category A tree in the south west corner of the site, which originally proposed garden space in the RPA of this important tree. Revisions were made to remove a unit in close proximity to the tree and to provide an area of pocket landscaping around the tree so its growth and health are protected.

Proposed landscaping details will be secured via condition.

Heritage – Archaeology:

Policy TB25 of the MDD states that Where development is likely to affect an area of high archaeological potential or an area which is likely to contain archaeological remains, the presumption is that appropriate measures shall be taken to protect remains by preservation in situ. Where this is not practical, applicants shall provide for excavation, recording and archiving of the remains.

Berkshire Archaeology have confirmed that the site has archaeological potential for remains from all periods, particularly the Iron Age, the Early Medieval, and Medieval periods. The key indicators of archaeological potential come from the results of a watching brief on the creation of the car park for the country park just to the west of the site, where remains of possible Iron Age – Roman settlement and a possible Early Medieval earthwork were discovered. The excavators of those features suggested these may have been of some significance, and so it will need testing whether these features, or related remains, extend into the present site.

A condition will be attached requiring a written scheme of investigation to be prepared and submitted to the Local Planning Authority prior to works commencing.

Ecology:

Policy CP7 of the Core Strategy states sites designated as of importance for nature conservation at an international or national level will be conserved and enhanced and inappropriate development will be resisted.

Policy TB23 of the MDD states that development should protect existing wildlife and biodiversity.

To the north of the site is a deciduous woodland (a priority habitat). The WBC Ecologist has advised that new development should not be located within 15m of this woodland. The site plan shows a separation distance of 19m between the northern most plots and the priority habitat (there is a ditch beyond the boundary before the priority habitat).

It is acknowledged that the rear gardens of these plots would be within 15m of the woodland, however this is the case with the existing dwelling and so there is not considered suitable grounds to resist the proposal on this basis.

Habitats:

Habitats on site include hardstanding/buildings, amenity and improved grassland, ornamental planting, species poor hedgerows and scattered trees. None of these are priority habitats and their loss would not be a constraint to the proposals.

Great Crested Newts (GCN):

GCN receive protection under UK law, and it is a criminal offence under the Wildlife and Countryside Act 1981 (as amended) and The Conservation of Habitats and Species Regulations 2010 (The Habitat Regulations), deliberately or recklessly to destroy or damage their habitats, or to disturb, kill or injure them without first having obtained the relevant licence for derogation from the regulations from the Statutory Nature Conservation Organisation (the SNCO - Natural England in England).

The application site is within the NatureSpace GCN District Licence (GCNDL) Red Zone which means that works are likely to affect GCN. Although, there are no ponds present on the site, surveys of three ponds within 250m of the site found none suitable for GCN. As such, the "Great Crested New eDNA Sampling" report concludes that GCN are unlikely to be affected by the development. NatureSpace raise no objection to the application subject to a Construction Environmental Management Plan and precautionary working method statement being secured via condition.

Other protected species (eg bats, badgers, nesting birds, reptiles etc):

The submitted report concludes that the development is unlikely to affect bats or reptiles. However, unmitigated, the proposals could have minor adverse ecological impacts ecological features such as nesting birds and badger setts.

As such, a Construction Environmental Management Plan (CEMP) Biodiversity will be secured via condition and should be implemented prior to works starting on site.

Biodiversity enhancements/ net gain:

The development is subject to mandatory Biodiversity Net Gain of 10%. The BNG report/technical note(AAe, Rev A, July 2025) concludes that the development will lead to an on site net gain of 0.69 Area Habitat Units (AHUs) equivalent to 15.55%.

One large and two medium trees will be removed. The net gain will be achieved through the planting of 64 small trees, creation of a large pond and areas of scrub across the

site, and the enhancement of areas of modified grassland in poor condition to moderate condition.

In accordance with Paragraph 193 of the NPPF which states that “opportunities to improve biodiversity in and around developments should be integrated as part of their design “, it is recommended that a condition be set to ensure that enhancements for wildlife such as integral bat and bird boxes are provided within the new development. These will be secured via condition. A wildlife friendly lighting scheme will also be required.

Overall, these plans appear acceptable as long as the biodiversity enhancements are delivered on site. Given the nature of the proposed on site measures, these would be considered as ‘significant on site enhancements’. This can be done through submission of a Biodiversity Net Gain plan plus a Habitat Management and Monitoring Plan (HMMP) secured via condition.

Thames Basin Heath Special Protection Area

Policy CP8 of the Core Strategy states that development which alone or in combination is likely to have a significant effects on the Thames Basin Heaths Special Protection Area will be required to demonstrate that adequate measures to avoid and mitigate any potential adverse effects are delivered.

The site is located within the 5km zone from the Thames Basin Heaths Special Protection Area (TBH SPA). The Thames Basin Heath Special Protection Area is an internationally important habitat that is home to 3 rare species of ground nesting birds - the Dartford Warbler, Nightjar, and Woodlark. To protect these, the government has designated the Thames Basin Heaths as a Special Protection Area (SPA) under the European Commission Birds Directive and placed mitigation zones around the heaths to lessen the impact of human activity on them. The Appropriate Assessment needs to be passed to ensure that development would not have adverse impact on the TBH SPA.

Natural England have no objection to the application subject to the Appropriate Assessment being passed. The Council, as the competent authority, has to ensure the Appropriate Assessment is passed before a development is permitted.

Mitigation proposed is for residential development (located within the 5km and 7km buffer zones) to contribute towards Suitable Alternative Natural Greenspace which aims to direct residents away from the SPA and rather into the SANG, thereby reducing footfall and pressure on the SPA.

Whilst this proposal is for the material change of use of the land, it will result in an increase in residential population and as such should provide mitigation.

A contribution towards SANG is required per dwelling (net increase) and this is dependant on the number of bedrooms in each dwelling. Each dwelling will also have to pay a Strategic Access Management and Monitoring (SAMM) contribution. SAMM is a project delivered by Natural England to implement messages, wardening and education across the TBH SPA and promote the use of SANGs.

The rate per dwelling is contained within the Appropriate Assessment and is dependant on the number of bedrooms per dwelling/ park home; this equates to 30 (net increase) x 2 bedroom dwellings/ park homes meaning the total SANG contribution would be £61,487.70 and the total SAMM contribution would be £24,300. This will be secured via a s106 planning obligation which means the development passes the Appropriate Assessment/ Habitat Regulations Assessment. The proposal therefore accords with policies CP3 and CP8 of the Core Strategy.

Environmental Health

Policy CP1, specifically criterion 8, states that development should “*Avoid areas where pollution (including noise) may impact upon the amenity of future occupiers*”. Policy HC5 of the LPU states that Development proposals will only be supported where it can be demonstrated that individually, or cumulatively in combination with other schemes, they do not have an unacceptable impact, either during the construction phase, or when completed, on:

- a) Human health, well-being or safety;
- b) Residential and public amenity;
- c) The quality of land, including soils and the subsurface;
- d) Air and Water quality (including surface water and groundwater); and
- e) Other sensitive receptors, including the natural environment.

Policy GA1 of the Finchampstead Neighbourhood Plan states that development proposals should demonstrate effective planning to mitigate noise and air pollution from traffic.

Noise

Policy CC06 of the MDD states that proposals must demonstrate how they have addressed noise impacts to protect noise sensitive receptors (both existing and proposed) from noise impacts.

No concerns were raised from the Environmental Health Officer regarding noise impacts arising from the proposed development on the existing environment. The surrounding area has examples of small residential communities, such as existing Victoria Gardens. Noise levels would be comparable to existing residential areas.

As those using the community building will be residents of the park homes, any noise generation from this facility would unlikely adversely affect occupiers of Victoria Gardens.

Conditions have also been recommended in relation to plant attenuation noise being capped. However, no plant machinery is being proposed and this would need planning permission in its own right.

To protect nearby occupiers from noise disturbance and other environmental health hazards during construction, an hours of work condition will be applied and a construction method statement detailing how the emission of noise, dirt and dust will be controlled during the development, waste/ recycling provision owing to the demolition of the existing house on site. With these stringent measures in place, impact on neighbours during the construction phase would be minimised. Environmental

Health Officers also raised the potential of asbestos during the demolition of the existing house, and this should be accounted for in the construction method statement.

Contaminated Land

The site is on potentially contaminated land. A contaminated land assessment will be secured via condition to ensure it can be satisfactorily managed and remediated so that it is suitable for the proposed end use and will not impact on the ground water environment, human health, buildings and the wider environment, during the demolition and construction phases as well as during the future use of the site. Conditions to secure this will be attached.

Air Quality

The site is not located within a designated Air Quality Management Area (AQMA). Notwithstanding this, the principles of Policy GA1 in the Finchampstead Neighbourhood Plan apply which specifically require mitigation from air pollution. As such, based on GA1 of the Neighbourhood Plan, an air quality assessment will be secured via condition to ensure the development does not result in harmfully adverse impacts in terms of air quality and pollution.

Waste provision

Policy CC04 of the MDD Local Plan requires development to incorporate suitable waste management facilities, including on-site recycling. Green waste provision should also be provided for, although this is an optional facility for individual households.

For the community building, a dedicated waste storage area will need to be proposed and the exact location can be secured via condition. In principle it would appear that there would be sufficient space for this. Each of the park homes would be responsible for the storage of their own waste on their individual plots.

Building Sustainability

Policy CC04 of the MDD Local Plan and the Sustainable Design and Construction SPD require sustainable design and conservation and R21 of the Borough Design Guide SPD requires that new development contribute to environmental sustainability and the mitigation of climate change.

It should be noted that the above policies (aside from the Finchampstead Neighbourhood Plan) are out of date and were written before the Council's declared Climate Emergency. For this reason, the Council produced a Climate Change Interim Policy Position Statement (CCIPPS) (2022) which outlines what is expected of development proposals in light of the climate emergency.

As the park homes do not amount to operational development, usual standards for bricks and mortar residential development cannot be applied. Ordinarily dwellings are required to meet the Interim Future Homes Standards and a 31% carbon dioxide emissions shall be achieved. However, a condition will be applied to ensure that measures are in place to ensure water use for each dwelling is at a standard of less than 110 litres per person per day. This water consumption standard to comply with the CCIPPS, which is a higher standard than that outlined in CC04. This is because Wokingham Borough is situated within part of the country classified as an area of serious water stress and a condition to this effect has been agreed by the applicant.

The proposed non-residential development (ie the community building/ office), sustainability policies apply in full force.

Policy CC04 states that:

All new non-residential proposals of more than 100 sq m gross non-residential floorspace shall at least:

- a) Achieve the necessary mandatory Building Research Establishment Assessment Method (BREEAM) requirements or any future national equivalent

As outlined in the Council's CCIPPS, a mandatory BREEAM requirement has not been set at the national level, as was the expectation when the policy was introduced. Best practice standards have generally been recognised as at least BREEAM 'Very Good' or 'Excellent' as is reflected in WBC's Sustainable Design and Construction SPD (2014).

However, the Future Buildings Standard, requiring new non- residential buildings to achieve a 27% reduction in carbon emissions, came into force on 15 June 2022. It is noted that the current BREEAM 'Very Good' classification does not achieve the minimum 27% carbon reduction required. All schemes must comply with updated building regulations and achieve the interim Future Building Standard which means requiring BREEAM 'Excellent' is justified. It will be secured via condition that the community building/ office will meet BREEAM 'Excellent' standard.

Employment Skills Plan

Policy TB12 of the MDD Local Plan requires an employment skills plan (ESP) for this development. ESP uses the Construction Industry Training Board (CITB) benchmark based on the value of construction.

The value of construction has been taken to be the proposed new floor space multiplied by £1025. This equates to £2,812,600. Based on this, any future ESP will require 3 community skills and 1 job start. If the applicant elects to pay the Employment Skills Contribution instead, that figure is calculated at £3750 for each job outcome (job starts and apprenticeship starts combined) as there is only one job start associated with band 1 targets the contribution would be £3750.

This will be secured via a s106 obligation where the applicant will have the choice to provide the Employment Skills Plan or provide in the contribution.

Other matters

Use of the Community Building and Office

The proposal would see the creation of an ancillary community building (use class F2(b)) and park office (use class Eg(i)). This would remain in private ownership. The space will foster community cohesion and could result in positive social benefits for the existing and proposed residents of Victoria Gardens. In light of the reduction of on site communal open space and with proposed private gardens being relatively small, this additional community space balances positively to help overcome these shortfalls.

As the facility has been presented as ancillary to the residential accommodation, this will be secured in perpetuity, as the facility has not been assessed as being one which could be accessed by the general public (ie from a highway or neighbouring amenity perspective). It will also be conditioned that the community centre is constructed in full prior to the occupation of the proposed park homes, to ensure future residents will have this facility upon their arrival. It will also be conditioned that the community building/ office remain in those particular uses in perpetuity.

Furthermore, it will be conditioned that the park home office can only be used in conjunction with the park home estate and not separate or external businesses. Once again, this is so the office in line with what has been applied for, as any other scenario would warrant a different assessment of the proposal.

Planning Balance and Conclusion:

This proposal has assessed the acceptability of an intensification of residential activity on the application. It also assesses whether, in principle, the site is suitable for the stationing of park homes, and the number of park homes proposed (31). The park homes themselves are not 'development' and therefore are not assessed in terms of their physical structures. However, the park homes will result in an increase in residential accommodation and therefore are treated as a form of housing development.

The Council cannot demonstrate either a 5 year housing supply and therefore the development must be assessed in line with Paragraph 11d(ii) and against the policies in the NPPF taken as a whole. As discussed earlier in the report, the tilted balance is still engaged for this development owing to the proposal facilitating residential accommodation when the borough does not have a 5YHLS. The three overarching objectives contained within paragraph 8 of the Framework seek to balance growth and local community needs against protection of the natural, built and historic environment. The benefits and disbenefits are therefore considered against these three broad topic areas below.

Economic

As with all residential of this scale in this location, the proposal would result in notable economic benefits. This is broadly set to arise from the short-term economic contribution of the construction of 31 park homes via construction industry jobs, albeit the construction involved would be more limited than bricks and mortar dwellings. In the longer term, future residents of 31 dwellings will contribute to the viability and vitality of businesses in Finchampstead and nearby towns. Although these are not unique to this scheme, the size of the development means these benefits are not insignificant and the development is therefore considered to perform a positive economic role in this part of the borough and is considered to hold moderate weight in the planning balance.

Social:

The provision of 31 new park homes, including a contribution towards affordable housing would positively assist in furthering the social objective of sustainable development. It would see a development that forms an extension to the existing settlement, as opposed to an isolated countryside development. It is appreciated that the dwellings are park homes rather than bricks and mortar dwellings, and therefore the scheme does not contain any mix in sizes of accommodation. However,

nevertheless, this proposal adds a greater variety of housing to the local stock, including smaller dwellings and those which may be more cost efficient for some individuals. The community building will also bring social benefits to proposed and existing residents of the park home estate. The social benefits are considered to hold substantial weight in the planning balance.

Environmental:

There would inevitably be a degree of visual harm to the immediate character and appearance of the land as the proposal would see the loss of part of a comparatively undeveloped site. However, whilst designated countryside, the site is not publicly accessible nor within productive agriculture. Rather, it is a large private residential garden and amenity space that is largely physically and visually enclosed from its immediate surroundings. As such, it is not of high amenity value nor makes a substantial contribution to the intrinsic rural character of the wider landscape. By virtue of appropriate boundary screening, the visual impact of the development on the surrounding area is not considered to be substantially harmful or as visually intrusive in the medium to long term as other such countryside locations. This environmental role is considered to have moderate weight in the overall planning balance.

Whilst there is identified conflicts with the development plan, namely its location outside of settlement limits, the proposal is not considered to undermine the intent of policy CP11 in this regard or conflict with its overarching aims. As mentioned earlier in this report, one of the aims is to maintain the quality of the environment. Through this assessment, it has not been identified that there would be substantial policy breaches or harms in relation to material considerations and therefore no reason for officers to conclude that the proposal would fail to maintain the quality of the environment to a level that would warrant refusal of the application. The benefits in relation to the three pillars of sustainable development have been discussed above.

Those less than desirable impacts of the development, namely loss of the openness of the land and traffic impacts are considered to be adequately dealt with via conditions and careful management of the construction phase.

In light of all matters raised, the adverse impacts of the proposed development would not significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework, including the Finchampstead Neighbourhood Plan and when taken as a whole. The application is therefore recommended for approval.

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. However, the Developer Contributions team confirmed that neither the park homes or ancillary community building would be CIL liable.

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, gender reassignment, marriage and civil partnership, pregnancy and maternity, race,

religion or belief. 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.

RECOMMENDATION	
Pre-commencement conditions and obligations agreed:	Yes
Recommendation:	Approve subject to the following conditions: 1. Time Limit 2. Approved Plans 3. Materials as specified 4. Detailed drainage design 5. Drainage maintenance plan and verification 6. Boundary Treatment 7. WSI 8. Parking and turning (as approved) 9. Cycle parking (as approved) 10. Visibility splays for private drives 11. Stopping up access 12. Construction method statement 13. Highway construction details 14. Lighting scheme 15. Delivery and servicing plan 16. Walking and cycling strategy 17. Hours of construction 18. Landscaping details 19. CEMP 20. LEMP 21. Arboricultural details 22. GCN precautionary working statement 23. Biodiversity enhancements 24. HMMP 25. Land contamination 26. Water consumption 27. Waste facilities details 28. Air quality assessment 29. Use of community building and office 30. Community building & office to be suitable for first use prior to the first occupation of the proposed park homes 31. Community building to remain ancillary to the residential development 32. Park home office only to be used in conjunction with the park home estate and for no other business

	33. BREEAM – community building And the following s106 obligations: 1. Affordable Housing contribution – contribution of £1,385,730.58 2. Employment and Skills Plan or Contribution – If opting to provide the plan this will need to include 3 x community skills and 1 x job start. If opting to pay the contribution instead, this would be £3750. 3. £1,228.81 per park home towards Arborfield Bus Strategy 4. £643 per park home towards MyJourney or travel plan to be provided 5. Contribution of £6500 towards extending 30mph zone westwards to the boundary of Barkham 6. Status of internal site roads – The roads will be required to be built to Council adoptable standards. If the site road is to remain private, the legal agreement will secure details of management company set up to look after the maintenance of the road, level of money set aside for maintenance, alongside the Borough's inspection fee and the APC bond. If the site roads are to be adopted, these would need to be delivered through s38 agreement with the Borough. The Borough would also require agreement on inspection fees and commuted sums 7. SANG/ SAMM contributions –SANG contribution of £61,487.70 and SAMM contribution of £24,300. This makes a total SANG/SAMM contribution of £85,787.70. 8. Off-site Public Open Space contribution of £327,605.33.
Date:	15 June 2026
Earliest date for decision:	25 July 2025

Recommendation agreed by: (Authorised Officer)	
Date:	15/06/26

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 **4.1 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 development would result in a net increase of **30 no 2 bedroom dwellings** within 5km of the SPA which results in a total SANG contribution of **£61,487.70**.

The proposed development is required to make a contribution towards Strategic Access Management and Monitoring (SAMM) which is also calculated on a per bedroom basis. Taking account of the per bedroom contributions this results in a total SAMM contribution of **£24,300**.

The total SPA related financial contribution for this proposal is **£85,787.70**. The applicant **must agree** to enter into a S106/s111 agreement to secure this contribution prior to occupation of each dwelling. Subject to the completion of the S106 agreement, the proposal would not lead to an adverse effect on the integrity of the SPA and would comply with SEP Saved Policy NRM6, policy CP8 of the Core Strategy, and the NPPF.

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 **5 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/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 **30 no dwellings**, broken down as follows: **30 no 2 bedroom dwellings**. Depending on the dwelling mix, the level of SANG payments are set out as follows:

No. of bedrooms	SANG Contribution 5km	Aggregate SANG Contribution
1 bedroom	£1,567.98	£0
2 bedrooms	£2,049.59	£61,487.70
3 bedrooms	£2,690.93	£0
4 bedrooms	£3,546.86	£0
5 bedrooms	£4,240.62	£0
Total SANG Contribution		£61,487.70

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 **30 no. 2 bedroom dwellings**. Depending on the dwelling mix, the level of SAMM payments are calculated as follows:

No. of bedrooms	SAMM Contribution 5km	Aggregate SAMM Contribution
1 bedroom	£582.00	£0
2 bedrooms	£810.00	£24,300
3 bedrooms	£1,077.00	£0

4 bedrooms	£1,267.00	£0
5+ bedrooms	£1,447.00	£0
Total SAMM Contribution		£24,300

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:		Signed:	15/06/26
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PLANNING CONSTRAINTS/STATUS

- Water Utility Consultation Zone
- Potentially Contaminated Land Consultation Zone
- Bat Roosting Suitability
- Scale and Location of Development – Countryside
- Great Crested Newt Consultation Zone (Red)
- Local Geological Sitesu
- Nuclear Consultation Sone
- Landscape Character Assessment
- SSSI Impact Risk Zones
- Thames Basin Heaths SPA Mitigation – 5km Zone
- Tree Preservation Orders
- Ordinary Watercourse