

DELEGATED OFFICER REPORT



WOKINGHAM
BOROUGH COUNCIL

Application Number:	252934
Site Address:	Land at Lodge Road, Hurst, Wokingham, RG10 0SG
Expiry Date:	16 March 2026
Site Visit Date:	12/02/2026
Proposal: Full application for the proposed erection of 3 no. detached dwellings with associated access, parking and landscaping and creation of a balancing pond.	

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 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 CC03 – Green Infrastructure, Trees and Landscaping CC04 – Sustainable Design and Construction CC05 – Renewable Energy and Decentralised Energy Networks CC06 – Noise CC07 – Parking CC09 – Development and Flood Risk CC10 – Sustainable Drainage TB05 – Housing Mix TB07 – Internal Space Standards TB21 – Landscape Character TB23 – Biodiversity and Development TB25 – Archaeology
Joint Minerals and Waste Plan (JMWP)	DM1 - Sustainable Development DM2 - Climate Change – Mitigation and Adaptation DM5 - Protection of the Countryside DM10 - Flood Risk
Wokingham	SS1 – Sustainable development principles SS2 – Spatial strategy and settlement hierarchy

Borough Local Plan Update (LPU)	SS5 – Development in the countryside SS10 – Meeting our housing needs 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 C5 – Parking and electric vehicle charging H1 – Housing mix, density and standards H3 – Affordable housing FD1 – Development and flood risk (from all sources) FD2 – Sustainable drainage NE1 – Biodiversity and geodiversity NE2 – Biodiversity net gain NE4 – Trees, woodland, hedges and hedgerows NE5 – Landscape and design NE6 – Valued landscapes NE7 – Sites of Urban Landscape Value DH1 – Place making and quality design DH2 – Safeguarding amenity HC5 – Environmental protection HC7 – Light pollution HC8 – Noise pollution HC9 – Contaminated land and water
Other	Borough Design Guide Supplementary Planning Document CIL Guidance + 123 List A Design for Hurst

PLANNING HISTORY		
Application No.	Description	Decision & Date
153431	Full application for the proposed erection of 12no dwellings, garages and creation of new vehicular access off Lodge Road.	Refused, 10/05/2016 Withdrawn at appeal on 23/01/2017
172894	Full application for the proposed erection of 5 no. new dwellings and garages with creation of a new vehicular and pedestrian access to Lodge Road and footway provision.	Refused, 06/12/2017 Dismissed at appeal on 31/01/2020 under APP/X0360/W/1 8/3194044

CONSULTATION RESPONSES

Internal

WBC Environmental Health – No comments received.
WBC Drainage – Further information requested.
WBC Highways – Further information requested.
WBC Economic Prosperity & Place (Community Infrastructure) – No comments received.
WBC Landscape and Trees – Objects to proposed development.
WBC CIL – The proposed development will be CIL liable.
WBC Ecology Newts – Further information requested.
WBC Ecology – Further information requested.
WBC Waste Services – No comments received.
WBC Cleaner and Greener – No comments received.

External

Thames Water Utilities Ltd – No comments received
The Environment Agency – Objects to proposed development. Further information requested.
Berkshire Archaeology – No objections, subject to a condition.
GCN Naturespace – Further information requested.

REPRESENTATIONS

Parish/Town Council	St Nicholas Hurst Parish Council: • Impact on existing settlements: Development represents infill along Lodge Road, outside the established settlement, compromising spatial separation between Whistley Green and Hurst, contrary to WBC policy CP11. • Flooding: Site is in Flood Zone 2; poor drainage; foul water treated on-site and discharged to ditches not linked to watercourses, potentially worsening flood risk. Proposed balancing pond unlikely to adequately address drainage concerns. • Sustainability: Hurst lacks accessible amenities without a car; limited bus service; unsafe/incomplete pedestrian routes; schools not readily accessible without crossing busy roads or car travel. • Local Plan: The site is not allocated in the emerging Local Plan; Hurst is a limited development location; development would alter spatial separation inconsistent with policy. • Landscape and Visual Impact: Development would reduce open views across fields from Lodge Road to Tape Lane, harming rural character and appearance.
Ward Member(s)	No comments received
Neighbours	30 objections from individuals (excluding duplicates) have been received, commenting on the following matters (as

summarised):

Highways / Access:

- New vehicular access onto Lodge Road (40mph semi-rural road) introduces safety risks, conflicts with through traffic, cyclists, and pedestrians.
- Lack of speed reduction, traffic calming, or safe pedestrian routes; all journeys would realistically rely on private vehicles.
- Dangerous exits from the site onto busy roads; collision risk increased.
- Existing local roads unsuitable for additional traffic; increased pressure on parking, schools, and services.
- Roads unlit, narrow, fast, with twists/turns, and no continuous cycle paths or pavements.
- Specific request for consistent speed limit reductions along Lodge Road (40 → 30 mph) to improve safety.

Officer comment: *Please see Highway Access and Parking Provision section of this report.*

Flooding / Drainage:

- Site is low-lying; large portions within Flood Zones 2 and 3.
- Southern parts function as floodplain; development would displace floodwater onto neighbouring properties.
- Drainage and sewer connections inadequate; Hatchgate Ditch blocked, foul water strategy not fully detailed.
- Proposed attenuation measures, balancing pond, or other drainage plans unlikely to mitigate flooding effectively.
- Hurst already prone to flooding; residents report increased insurance premiums.
- Previous appeal decisions highlighted flood risk as a reason for refusal.
- Concerns about viability and realism of proposed drainage/sewerage solutions.
- Requests for mandatory balancing pond with sufficient capacity to protect existing properties.
- Requirement for secure fencing around balancing pond to protect children.
- The development would worsen floodplain issues and drainage plans are flawed.

Officer comment: *Please see Flooding and Drainage section of this report*

Impact on Countryside / Character / Settlement Separation:

- Site lies outside the defined settlement boundary; represents unjustified residential development in open countryside.
- Erosion of open countryside gap along Lodge Road, diminishing separation between northern and southern Hurst and contributing to settlement coalescence with Whistley Green.
- Harm to rural character, landscape, and visual amenity; density, scale, and siting inappropriate.
- Conflicts with previous appeal decisions (2020 appeal for 5 dwellings; nearby 99-house appeal).
- Development sets a dangerous precedent for ribbon development on adjoining fields.
- **Mr Ray Clark:** site contributes to separation between northern and southern parts of Hurst; development would erode this gap.

Officer comment: See *Principle of Development, Character of the area and Trees and Landscape Impact* sections of this report.

Planning History / Sustainability:

- Site not part of housing land supply; Hurst is a limited development location and has already contributed to borough development limits.
- Proposal fails to meet exception criteria; limited benefit of three dwellings does not outweigh substantial harms.
- Site unsustainable in relation to services and public transport; high reliance on private cars.
- Previous planning history noted, including 2020 appeal dismissal and nearby 99-house appeal.

Other / Environmental Concerns:

- Potential contamination / leachate risks from nearby capped landfill.
- Surface water management affected by surrounding landscape and previous development.
- Flood Risk Assessment and supporting documents considered incomplete or inconsistent.

10 letters of support have been received in relation to the application, nine of which were submitted via a third-party organisation, 'Just Build Homes'. It should be noted that, due to the involvement of this third party, the Council is

	unable to verify consent to publish the content of these submissions. In addition, some of the letters received did not include a name or address. As a result, the specific content of these letters is not explicitly reproduced in this report, although their existence and general support have been taken into account by the Case Officer in the assessment of the application. The comments of support submitted directly via the Council's website are summarised below: • Support for the application for three new homes; notes high local housing need and considers the scheme well thought out and logical.
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APPRAISAL

Site Description:

The application site is located on the eastern side of Lodge Road. It currently comprises a grassland field containing trees, hedgerows, and areas of scrub. The site is situated within the countryside and lies between residential dwellings, with properties predominating to the south as part of Hurst, a single dwelling to the west, and a single dwelling to the north, beyond which lies the village of Whistley Green. The surrounding land to the east and west is characterised by open countryside, including areas of farmland.

Planning History and Proposed Development:

This application represents the latest submission in a series of planning proposals for residential development at the site. The first application, under planning reference 153431, sought permission for the erection of 12 dwellings and was refused in May 2016. The second application, under planning reference 172894, proposed the erection of 5 new dwellings and was refused in December 2017. This second application was subsequently appealed under ref: APP/X0360/W/18/3194044 under via a public inquiry, and the appeal was dismissed in January 2020.

This application seeks planning permission for the erection of three two-storey detached dwellings (two 4-bedroom and one 3-bedroom), including a detached carport for one dwelling (plot 1) with associated access, parking, landscaping, and the creation of a balancing pond.

Principle of Development:

Planning law requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise. In this case the development plans for the area are the Wokingham Borough Core Strategy 2010 and the Managing Development Delivery Local Plan 2014. At a national level, the National Planning Policy Framework (NPPF) constitutes

guidance which the Local Planning Authority (LPA) must have regard to. The NPPF does not change the statutory status of the development plan as the starting point for decision making but is a material consideration in any subsequent determination.

National Planning Policy Framework (2024):

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

The National Planning Policy Framework (NPPF) states under paragraph 11 that where a local planning 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. This presumption in favour of sustainable development outlined in paragraph 11 of the NPPF is commonly referred to as the 'tilted balance' as harm and benefits are not weighed equally, but tilted according to paragraph 11(d)ii).

Having established the tilted balance is 'engaged', Paragraph 11d(ii) requires the proposals to be considered against the policies of the NPPF taken as a whole and the three pillars of sustainable development. These will inform the planning balance exercise carried out at the end of this report.

Core Strategy (2010):

The site is located outside of development limits and therefore subject to assessment under Policy CP11 of the Core Strategy. Policy CP11 does not permit development outside of development limits unless it falls within the following exemption criteria:

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:
 - Bring about environmental improvements; or
 - 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.

Criterion 1:

The proposals do not contribute to diverse and sustainable rural enterprises within the borough, nor does they promote recreation in, and enjoyment of, the countryside. The proposals therefore fail criterion 1.

Criterion 2:

Like the previous refusal of 172894, the proposal would result in a hitherto undeveloped rural grassed field land being used as permanently residential with associated hardstanding and residential paraphernalia, thus introducing built form into the countryside. As such it would result in excessive encroachment and expansion of development away from original buildings and is contrary to criterion 2.

Criterion 3:

The proposals do not involve existing buildings or replacement buildings. The proposals are therefore contrary to criterion 3.

Criteria 4, 5 and 6:

The proposals do not involve residential extensions, replacement dwellings or essential community facilities and therefore these criteria are not relevant to this application's determination.

Criterion 7:

The proposals do not involve affordable housing on a rural exception site. The site area triggers for affordable housing contributions and the PDAS suggests that the application would like to provide monetary contributions in lieu of the Council's Affordable Housing contributions. However, there is no provision of on-site affordable housing and as such, the proposal is not considered to comply with point 7 of CP11.

The clear starting point is that this proposal will not normally be permitted. The proposed development does not accord with any of CP11's criteria.

Emerging Local Plan Update (LPU):

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 marked in bold in the policy table earlier in this report are those that have received less objection and therefore individually

hold are considered by officers to 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.

Character of the Area:

Policy Context:

With regards to well-designed places, paragraph 130 of the NPPF states planning policies and decisions should ensure that developments:

- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);

Similarly, paragraph 134 states that development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes. This is supported by paragraph 125 of the NPPF too, which states:

“Area-based character assessments, design guides and codes and masterplans can be used to help ensure that land is used efficiently while also creating beautiful and sustainable places.”

The National Design Guide section B1, paragraph 67 also states that the built form of well-designed places should relate well to:

- the site, its context and the opportunities they present;
- the proposed identity and character for the development in the wider place;

Paragraph 68 follows on from this stating that houses and streets should establish an appropriate relationship with the pattern, sizes and proportions of existing houses in the local area.

Policy CP11 supports development in the countryside only where it maintains the high quality of the rural environment. Policy CP1(1) similarly only supports development that maintains or enhances the high quality of the environment, with policy CP3 supporting development of an appropriate mass, layout, built form, height and character to the area CP3(a) and which makes a positive contribution to the sense of place contributes to the buildings and spaces themselves and in the way they integrate with their surroundings CP3(f).

The Borough Design Guide Supplementary Planning Document provides further guidance for developers with general guidance that development should respond positively to its site and local context (G1) and respond positively to the local

character of the area (G2).

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

Proposed development:

The main change to the development since the refusal of application ref. 172894 is the reduction in the number of dwellings proposed, from five to three. This reduction has informed the revised design approach, resulting in a simpler and more linear layout across the site.

The proposed materials have also been amended. Previously, concerns were raised regarding the extensive use of black weatherboarding on several of the dwellings, which was considered to contrast with the palette of materials found in surrounding properties and the wider countryside setting.

Based on the submitted elevation drawings, Plots 2 and 3 are proposed to be constructed using a combination of orange brick and brown hanging tiles, while Plot 1 would incorporate similar materials with the addition of a cream rendered ground floor. These materials are considered to better reflect the local palette of materials present in the surrounding area.

Assessment:

The application site represents a critical break in the built-up form, serving as a functional and visual buffer between the northern and southern arms of the Hurst and Whistley Green settlements. To the south, the dwellings at Nursery Close and beyond represent the definitive edge of the "built-up" area and delineate the settlement boundary as defined in the Development Plan as a Limited Development Location.

The Inspector's previous assessment (APP/X0360/W/18/3194044) established that the site is an important component of the rural open space separating the distinct arms of the village, stating the following in paragraph 25:

'...I have observed the site is an important component of the rural open space between northern and southern arms of the village. It serves a purpose in retaining the rural character along Lodge Road... given that the appeal site is important to the gap between the developed areas the impact in the immediate locality would be more keenly felt.'

Although the current proposal arranges the three dwellings in a linear format, this layout fails to address the fundamental concern regarding the erosion of the physical gap between settlements. The proposed layout places the bulk of the three dwellings towards the northern end of the application site, projecting deeper into the designated countryside, away from the pattern of development to the south. Plot 1, in particular, sits approximately 8 metres from the northern boundary shared with 'Badgers

Bottom'. This positioning ensures that the built form is not merely a rounding-off of the southern edge, but a deliberate northward migration of the settlement edge, effectively eroding the openness of a tract of land that currently acts as a vital transition between the northern and southern arms of the Hurst and Whistley Green settlements. The introduction of a group of 3 new dwellings would result in residential developments spreading into the countryside which would give rise to significant harm to the rural character of the area.

The development appears to mirror the scale, linear layout and shared access arrangement of three properties to the south, namely Pine Croft, 'Southerndown', and 'Albury House'. However, a reliance on these dwellings as a design precedent is fundamentally misplaced. There is a clear divergence in character and designation between the two areas. Those existing properties lie within the Limited Development Location and are part of an established built-up grain, supported by further development along Sawpit Road and the cul-de-sac of Barber Close to their rear. In contrast, the application site and the immediate countryside to the north exhibit a distinctly more informal and rural character. The neighbouring properties of 'The Old Lodge' and 'Badgers Bottom' are orientated away from Lodge Road, reinforcing their status as low density dwellings within extensive grounds rather than part of a formal street scene. As such, the site and its southern neighbours belong to two fundamentally different character settings; to apply the built-up grain of the south to the rural gap of the north would be discordant.

The proposal would result in the substantial loss of greenfield land through its conversion into building footprints and extensive areas of domestic hardstanding for vehicular access and parking. The scale of the proposed access and turning infrastructure would occupy a significant proportion of the site, requiring the removal of sections of the established hedgerow along the Lodge Road frontage to achieve appropriate access and visibility splays. This would erode an existing landscape feature and diminish the rural character of the area.

The extent of the domestic built form and associated hardstanding would be clearly perceptible from Lodge Road and from the wider landscape, including by users of the permissive footpath immediately to the west, which the previous Inspector identified as a sensitive viewpoint:

In visual terms the site also performs a function in clearly forming part of the gap between developed areas. It is visible from the permissive path to the west, particularly when leaves have fallen from the trees. Although the boundary trees and hedgerows along the roadside of the site itself limit visibility of the paddock area the boundary is an attractive (if unkempt) feature in its own right. Users of the permissive path can be regarded as sensitive to visual change since many of them will be using the path for recreational purposes. (paragraph 26).

The development would therefore fundamentally alter the site's current contribution to the rural scene and result in harm to the character and appearance of the countryside.

Furthermore, as highlighted by the Inspector in the previous appeal decision, the

proposed dwellings would also be visible from Tape Lane, albeit across the intervening open field. The dwellings, with a height of approximately 9 metres similar to those previously proposed, would project above and between existing vegetation, emphasising the encroachment of built development into the countryside. Even accounting for the reduction in the number of dwellings and the proposed landscaping, the development would remain visually prominent within the rural landscape.

Overall, even with the reduced number of units, the development would fundamentally alter the site's character from a rural paddock to a domestic setting. This form of 'urban creep' would be perceived as an encroachment into the countryside and would fail to maintain the high quality of the rural environment. The harm arises not only from the presence of the buildings themselves, but also from the loss of the physical and visual gap that currently plays an important role in preventing the coalescence of the settlement areas between Hurst and Whistley Green. The proposal would therefore fail to respect the transition between the built-up area and the countryside. As such, the development would not reflect the local character or established settlement pattern, resulting in harm to the character and appearance of the area and the wider landscape.

Sustainable Location

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

Policy CP6 states of the Core Strategy states:

'Planning permission will be granted for schemes that:

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

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

The supporting text to Policy CP6 states:

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

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

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

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

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

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

The document further advises that 400 metres is a desirable walking distance outside of city centres; 800 metres is stated as acceptable and 1,200 metres is the preferred maximum. The document further states that these suggested walking distances are for pedestrians without a mobility impairment. The definition of a pedestrian MfS includes people of all ages, sizes and abilities. Therefore, the maximum distance in the CIHT document does not take into account disabled, elderly or small children and is referred to as an upper limit: the maximum threshold would not result in an inclusively located development where people of all ages, sizes and abilities would be encouraged to walk to local services.

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

Policy CP6 refers to encouraging a modal shift away from the use of private motor vehicles. Therefore, whilst the upper walking distances recommend what could be deemed walkable, the policy aim is not just to locate development where some individuals may choose to walk: it is to locate development in areas with best access to existing good services to actively encourage a modal shift where the whole community would be encouraged to utilise sustainable modes of transport.

Assessment:

The application site is located outside of settlement limited with the designated limited development boundary located approximately 20 metres to the south.

It is already established by the Inspector for the previous appeal (ref:

APP/X0360/W/18/3194044) that the application site is located in an unsustainable location. Paragraph 40 of the Inspector's decision states the following:

“Taking all of these matters together it is my judgement that the location of the appeal site would not follow sustainable principles. Residents of the site would not be likely to take advantage of walking, cycling or public transport to any significant degree. In my judgement this is not an accessible location as required by Policy CP9. In this respect it is distinguishable from the Valley Nurseries site which has an entirely different relationship with surrounding streets, facilities and access to public transport. The likely reliance on private vehicles would not be in tune with the NPPF objectives and would be in conflict with most important policy CP9 and Core Strategy Policies CP1 and CP6 which, taken together, seek to ensure that development provides for sustainable forms of transport to allow choice (amongst other things). In this instance I do not accept that there would be a realistic and viable choice for the majority of people.”

In response, the applicant has submitted an updated Transport Statement (by Pulsar, October 2025). The report, as summarised, has made the following justification on sustainability grounds:

- The site is located within walking distance of several local facilities and amenities, including a local school and recreation ground, which are said to be approximately a 5–10 minute walk away. It is also noted that a local bus service operates within around a five-minute walk of the site, providing connections to Twyford and Winnersh and onward links to rail services. On this basis, it is suggested that future residents would have access to a range of travel options, including walking and public transport, to reach nearby facilities and larger settlements.

There are limited services in Hurst and Whitley Green, which is typical of small villages. These include a village store and post office, bakery and takeaway, primary school, playing fields, village hall, nursery, public houses, places of worship and allotments. It is noted that the Hurst Co-op food store has closed since the appeal and has since been replaced with an independent local convenience/village store, which also includes the local post office. The services listed above, including the also not concentrated in a central location but are interspersed throughout the two villages with a small concentration on Broadwater Lane to the north and some along Sawpit Road and School Road to the south, extension to the east.

Walking:

There are no footways provided along Lodge Road in the vicinity of the application site. The closest footpath is located approximately 95 metres to the south on the eastern side of Lodge Road, between Nursery Close and Sawpit Road. This footpath is present on only one side of the road, is less than the minimum recommended width of 2 metres as set out in Manual for Streets (MfS) and is not served by street lighting. From Sawpit Road, there are no footways for a distance of approximately 170 metres east from its junction with Lodge Road to its junction with Barber Close.

The poor usability of Sawpit Road was previously established by the Inspector in relation to the appeal at the application site (ref: APP/X0360/W/18/3194044). The Inspector stated:

“...I do not agree with the assessment of the Appellant that this is a road used, in effect, as a shared surface...” and “...I walked the road on several occasions and did not consider it to be akin to a shared surface. It has not been designed as such, and traffic does not seem to behave as it would on a designed shared surface, by reducing speed and being aware that pedestrians may be present. Traffic behaves as one would expect on a 30mph village street with parked vehicles present – by taking avoiding action where necessary, but not seemingly being aware of any increased propensity for pedestrian activity.” (Paragraph 30)

‘In any event it is not a pleasant pedestrian route. The presence of parked cars forces pedestrians towards the centre of the relatively narrow carriageway. It is for the most part impossible to use the verge on the northern side as it has been churned up by parked vehicles. In darkness this would be a further hazard. Further towards the village centre there is formal footpath, but this is variable in width and I am not satisfied that it would be wholly suitable for anyone with impaired mobility or with small children. In addition it is necessary to cross the road in order to continue on the footpath close to the school, and then cross back because of the discontinuous nature of the path. The second crossing point outside the school is also a pinch point for traffic because of the presence of parked vehicles outside the school, and this can make crossing more difficult. Furthermore the pedestrian, if heading for the village store, then has to cross the A321 on 2 occasions. In short I do not consider that the pedestrian route to the village is in any way an attractive route for pedestrians. I am sceptical that it would be used much, if at all.’ (Paragraph 31)

While the supporting Transport Statement suggests that 81% of journeys shorter than 1 mile were made wholly on foot, it does not imply that 1 mile should be taken as a benchmark for an acceptable walking distance. It would be a misinterpretation to conclude that day-to-day journeys of up to 1 mile (1.6 km) represent a reasonable or ‘maximum’ walking distance.

The walking distances set out in the IHT’s Guidelines for Providing for Journeys on Foot to be the most applicable reference for assessing pedestrian accessibility. These distances are understood to apply broadly, including within rural areas and for journeys such as commuting and school travel.

It is also noted that the walking trip assessment within the submitted Transport Statement relies, in part, on the use of a permissive footpath located on the western side of the B3030 Lodge Road. The applicant should be reminded that there is no permanent legal right of way for the public to access this path at all times. In addition, there is no suitable crossing point across the B3030 adjacent to the site frontage. Furthermore, the route is unsealed and lacks lighting, and would therefore be unsuitable for use during inclement weather or outside of daylight hours.

The site would not be well connected to any local centre or employment areas. Some

limited facilities are located within approximately 1,200 metres, including a small bakery, 'Hurst Bakery & Provisions', which is infrequently open and, at the time of writing, is shown as permanently closed on Google Maps, as well as a convenience store and a public house. There is a Primary School, Community Hall and Nursery to the south but as aforementioned, there are no footpaths linking the site to School Road and parents and children would have to walk down a single-track road with no street lighting.

There is also no information within the submission regarding the capacity of the local primary school, St Nicholas Church of England Primary School, to accommodate children arising from the development. The school is understood to be oversubscribed, which may place additional pressure on local education provision and could result in reliance on schools outside the immediate catchment area, which is generally considered to be unsustainable.

Overall, opportunities for pedestrians are very limited; the walking environment and experience would be a poor one that would fail to deter the use of private motor vehicles and encourage a modal shift to walking and cycling.

Cycling

There is currently no dedicated cycling infrastructure along the B3030 Lodge Road. The speed limit along the site frontage is 40mph, increasing to the national speed limit approximately 45 metres south of Sawpit Road. As a result, cyclists would be required to travel within the carriageway alongside motor vehicles.

Under Local Transport Note 1/20 (LTN 1/20), this arrangement is classified as 'mixed traffic' conditions. 'Mixed traffic' conditions with speed limits of 40mph are considered as "Provision suitable for few people and will exclude most potential users and/or have safety concerns". Protected spaces for cycling are required to be considered safe for most users.

In addition, the surrounding roads are relatively narrow and largely unlit, which would further reduce the attractiveness and perceived safety of cycling in this location.

The Inspector in the 2020 appeal decision relating to the application site made the following observation:

"I do not rule out the use of cycles for access to and from the appeal site, but this must be tempered by the fact that Lodge Road has the potential to be an intimidating route, as implicitly acknowledged by the Appellant's suggestion that cyclists could walk as far as Sawpit Road. In my judgement cycling is not likely to be a significant alternative mode of transport used by occupants of the appeal site." (Paragraph 35).

Overall, the site has limited opportunities for safe and attractive cycling. The absence of dedicated infrastructure and the nature of the surrounding road network mean that cycling is unlikely to represent a realistic or attractive travel option for most potential residents.

Buses

There are bus stops along the A321 for the 128/129 bus, which is a subsidised service. The frequency of 128/129 service does not meet the good service criteria as set out in policy CP6:

'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).'

There are no services on Sundays. Services during peak hours do not have a frequency of 30 minutes. Services off peak have a frequency greater than one hour. There are no services in the evening with the last bus being around 6pm towards Reading and 7.30pm towards Wokingham. The first bus of the day is also relatively late at 7.45am towards Wokingham and 7.25 towards Reading.

The closest bus stop served by the 128 and 129 services. to the site is located approximately 575m away to the southeast along School Road on the southern side of the carriageway. There are no shelters or seating at these stops.

There are no nearby secondary schools. The nearest secondary schools are between 3 – 4.5km from the site as the crow flies. The bus service does not go near the Piggot School (north of Twyford), the nearest stop in Twyford is 1.5km away. The infrequency of the service would also make it unpractical for school children. Morning busses would either result in pupils being significantly early or considerably late.

As the bus service does not meet the good criteria set out in CP6, the buses to secondary schools' southward towards Wokingham would generally be out of phase with start and finish times. Pupils would also have a choice of arriving appreciably before school opening times or being significantly late. Homeward journeys would result in lengthy waiting times for buses, which would be half an hour in some cases, and long journey times home of up to one hour.

Access to the same local schools via this bus service was considered in a more recent appeal decision under ref: APP/X0360/W/25/3364304 relating to an outline application for 99 dwellings on land adjoining the eastern boundary of the application site. The inspector stated the following:

Higher order centres can also be accessed by bus. There are bus stops within walking distance of the site. The 128/129 service connects to Twyford, Winnersh, Wokingham, Woodley and Reading on roughly an hourly basis but with a limited evening service and no service on Sundays. Even with a recent improvement to the bus services through Hurst, they fall below the standard of service considered to be 'good' in the supporting text to Policy CP6 of the Core Strategy. (paragraph 35).

There has been no material change in the bus service since the previous appeal, it

has the same poor service.

The limited accessibility of the site and the wider area to services and facilities by sustainable modes of transport has also been recognised in the appeal case APP/X0360/W/25/3364304 adjoining the application site. Although that proposal included a detailed package of transport measures intended to improve opportunities for walking, cycling and bus use, the Inspector concluded that these measures were insufficient to overcome the fundamental issue that the surrounding villages offer only a limited range of services and facilities.

The Inspector stated the following in paragraph 43:

'I conclude that the location of the development is not readily accessible to services and facilities by sustainable means of transport, and while the package of travel measures would be of benefit it would not increase accessibility to higher order services and facilities to the extent that would make it fully sustainable. The development would therefore conflict with Policies CP1, CP3 and CP6 of the Core Strategy which seek to provide choices in the mode of transport available and minimise the distance people need to travel. I recognise that opportunities to maximise accessibility varies between urban and rural areas, but that does not by itself justify significant development being located in an area with restricted accessibility....'

Overall, the existing bus service is limited, which emphasises the spatial strategy's importance of locating housing development in sustainable locations with established transport connections, rather than on the edge of small villages in the countryside.

Rail

Twyford railway station would be an approximately 2.5km walk from the centre of the site which is outside of any recommended walking distance. The footpaths along the A321 are only one side of the road for large sections and have narrow sections less than the minimum 2m metre width. Large sections of the road have no street lighting, are well trafficked and benefit from no passive surveillance due to the rural location. The potential offsite works towards the railway station do not change the length of the journey being outside of recommended maximum guidelines and narrow sections of the pavement would still remain.

In conclusion, the application site is not located within convenient walking distance of most day-to-day facilities and services, such as schools, retail, leisure and medical facilities. This is likely to discourage future residents from travelling on foot and instead increase reliance on private vehicles. Footways in the area are either absent or unlit, and cycling conditions are poor. In addition, the available bus service does not meet the Council's definition of a good level of public transport provision.

As such, the site is poorly located in relation to local facilities and services, and future occupiers would be heavily reliant on private motor vehicles. The proposal therefore conflicts with Policies CP1, CP2, CP3, CP6 and CP11 of the Core Strategy, Policies CC01 and CC02 of the MDD Local Plan, the Borough Design Guide SPD, and Sections 8 and 9 of the NPPF.

Neighbouring Amenity:

The proposed dwellings would be appropriately positioned away from the site boundaries, and adequate separation distances would be maintained between each of the new dwellings to ensure that no unacceptable loss of light or overbearing impacts would arise.

It is noted that Plot 1 would introduce a new first-floor window on the northern side elevation, which could allow views towards the rear garden of Badgers Bottom. However, this window would be located approximately 30 metres from the rear elevation of that property, and any potential views are likely to be largely screened by existing mature vegetation along the intervening boundary. In any event, the window could be conditioned to be obscure glazed, given that it would serve a non-habitable room.

The proposed first-floor side windows at Plots 2 and 3 would be appropriately positioned to ensure that no unacceptable mutual overlooking would occur between the dwellings. Accordingly, no objections are raised to the proposal on neighbouring amenity grounds.

Amenity Space:**Internal:**

The internal space standards for new dwellings are set out in the Borough Design Guide and supported by Policy TB07 of the MDD. All three dwellings proposed meet the minimum standards required for their occupancy levels and would provide adequate internal space to serve future occupiers.

External:

The Borough Design Guide specifies a minimum depth of 11 metres for rear gardens and a 1 metre set-back from the site boundary to allow access thereto. The proposed amenity spaces of all dwellings comply with the requirements of the Borough Design Guide.

Highway Access and Parking Provision:**Site Access**

The proposed development would be accessed via a 4.8-metre wide improved access onto the B3030 Lodge Road, broadly in the location of the existing access point.

Lodge Road is subject to a 40mph speed limit, which typically requires visibility splays of 2.4m x 120m to be achieved at the access point. The submitted Transport Statement assesses these sightlines using a 0.5m offset, as set out in Appendix B, which is noted. Visibility splays should be provided across land within the applicant's control or the public highway and should be kept clear of obstructions exceeding 0.6m in height.

The submitted information indicates that the maximum achievable stopping sight distance (SSD) along the tangent to the bend is approximately 100.3 metres before being obstructed by a tree located outside the applicant's control. Given that the speed limit transitions from national speed limit to 40mph approximately 45 metres to the south of Sawpit Road, the appropriate SSD for a 40mph road would typically be around 102 metres.

Should the application be recommended for approval, it may be necessary for the applicant to review the precise siting of the access, including the potential to relocate it slightly to the north, in order to ensure that the required visibility standards can be achieved. This could be secured via a condition in the event of any approval.

Internal Access Road

The internal access road is proposed to operate as a shared surface with a width of 4.8 metres throughout, which would be capable of accommodating two-way traffic. This arrangement is noted.

Whilst it is anticipated that the internal road would remain private, it would be expected to be constructed to an appropriate highway standard. In this regard, a service margin would typically be required along the road where development is proposed, in accordance with the Borough's highway design guidance. This would normally comprise a 2m service margin, with 0.5m required where no services are present and up to 1m where street lighting is proposed. Such details could be addressed as part of the detailed design stage and secured via a condition if the application were to be recommended for approval.

A swept path analysis has been submitted demonstrating that a DB32 fire appliance can enter and acceptable.

Parking

In accordance with Wokingham Borough Council's Parking Standards, a development of this scale in a village location would typically require a minimum of eight parking spaces within the red line boundary, including provision for unallocated and visitor parking.

Parking spaces are expected to have minimum dimensions of 5.0m x 2.5m. The minimum size for a single garage or carport intended for parking purposes is generally 6m x 3m, with each garage space contributing 0.5 spaces towards the overall parking provision. Parking spaces positioned in front of garages are typically set back by at least 0.5m from the garage door to allow for door opening.

The submitted plans indicate the provision of five allocated driveway spaces, two carport spaces and four garage spaces. However, the level of unallocated or visitor parking provision appears limited. In addition, consideration may need to be given to the length of the driveways serving Plots 2 and 3 to ensure that additional parking does not obstruct the shared access road. This could be addressed through minor revisions to the layout if necessary.

Should the application be recommended for approval, the overall parking layout and provision could be secured through a condition as appropriate.

EV Charging Points

Each new dwelling would be expected to provide at least one electric vehicle charging point in accordance with Building Regulations (Approved Document S). The submitted information indicates that each dwelling would be provided with an EV charging point, which is noted.

Cycle Provision

In accordance with the Council's Parking Standards, dwellings with six or more habitable rooms are expected to provide three cycle parking spaces per dwelling. A shed has been indicated within the rear garden of Plot 1, which could provide cycle storage; however, the submitted dimensions of approximately 1.8m x 1.8m may be limited in terms of accommodating three bicycles. Similarly, garages of approximately 6m x 6.3m may not comfortably accommodate both car parking and cycle storage.

Should the application be recommended for approval, further details of cycle parking provision, including suitable storage areas with convenient access to the rear garden or appropriately sized garages or stores, could be secured by condition.

Refuse Collection Strategy

According to Manual for Streets, the maximum carrying distances for households (30m) and refuse collection operators (25m) from the collection point. Such standards will apply to all plots within the site.

While kerbside refuse collection arrangement will likely be suitable for this site, a bin store / bin collection point shall be indicated on the plan. This could be secured by condition in the event of any approval.

Flooding and Drainage:

Policy CC09 of the MDD Local Plan requires consideration of flood risk from historic flooding.

Policy CC10 of the MDD Local Plan requires sustainable drainage methods and the minimisation of surface water flow.

The application site is subject to multiple sources of flood risk. A main river ditch runs along the eastern boundary of the site and parts of the application site fall within fluvial Flood Zones 2 and 3. In addition, significant areas of the site are identified as being at risk of surface water flooding, including areas within the 1 in 10 and 1 in 100 year extent. The site is also located within an area identified as having very high groundwater levels, where groundwater emergence is mapped as being either at ground level or within 0.025m of the ground surface. The site is therefore at risk from fluvial, surface water and groundwater flooding.

Paragraph 175 of the National Planning Policy Framework states that the Sequential Test should be applied in areas known to be at risk from any form of flooding, unless it can be demonstrated through a site-specific flood risk assessment that no built development, access routes, land raising or other vulnerable elements would be located within areas at risk from flooding. In this case, the submitted Flood Risk Assessment demonstrates that built development, access arrangements and associated engineering works would all be located within areas at risk from flooding, including fluvial and surface water flooding. The requirement to apply the Sequential Test therefore clearly arises.

The accompanying document titled *Flooding Sequential Test and Exception Test* acknowledges that the Sequential Test is required and concludes that the proposal fails the Sequential Test.

Paragraph 174 of the National Planning Policy Framework states unequivocally that: *“Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding.”* It therefore follows that this policy position provides a strong reason for refusing the development.

Evidence relating to the availability of alternative sites has been recently examined in the appeal decision relating to land at Lodge Road (APP/X0360/W/25/3364304) following a Public Inquiry. That site adjoins the eastern boundary of application site, which is liable to flooding from the same sources. In that case, approximately 14,500 dwellings were identified on sites considered sequentially preferable to development in this location. That appeal site ranked 225 out of 257 sites, placing it within the bottom 15% of sites in sequential terms, indicating that the location performs poorly when assessed against the Sequential Test. The Council also identified that a number of sites had been incorrectly discounted, meaning that the number of sequentially preferable sites was likely to be greater than identified in that assessment.

Whilst the applicant refers to the Lodge Road appeal decision, it is important to note that a greater proportion of the current application site is affected by fluvial and surface water flood risk than the Lodge Road site. The submitted Flood Risk Assessment shows that parts of the proposed dwellings, access arrangements, turning areas and gardens would fall within areas at risk from flooding, and the proposed attenuation basin would also constitute an engineering operation located within areas affected by fluvial flooding and very high groundwater levels. The flood risk constraints affecting the application site are therefore more extensive and more acute than those previously considered in the Lodge Road appeal. Notwithstanding, all of the site is within an area with the higher susceptibility of Ground Water flooding.

It is established national policy that the Exception Test should only be applied where the Sequential Test has been passed. As the Sequential Test has been failed in this case, it is not necessary to consider whether flood risk could theoretically be mitigated through design measures. Notwithstanding this, the Council's Drainage Engineer has raised concerns regarding the feasibility of the proposed drainage strategy, including the siting of the attenuation basin within areas affected by fluvial flooding and the implications of the consistently high groundwater levels across the

entirety of the site.

The flood risk implications of the site therefore provide multiple and strong reasons for refusal:

First, national policy at paragraph 174 of the National Planning Policy Framework clearly states that development should not be permitted where the Sequential Test is failed and reasonably available sites exist in areas of lower flood risk.

Second, the site is affected by multiple sources of flooding, including fluvial, surface water and groundwater flooding, rather than a single isolated flood risk constraint.

Third, the entire site lies within an area of very high groundwater susceptibility, and elements of the proposed development would be located within areas at risk from fluvial and surface water flooding, meaning that flood risk affects all the developable areas of the site.

Fourth, even if the Exception Test were applicable, which it is not in this case, the available evidence does not demonstrate that flood risk could be safely and sustainably managed, nor that the proposal would avoid increasing flood risk elsewhere.

Finally, even where mitigation measures are proposed, residual flood risk would remain, with potential consequences including damage to buildings and possessions, disruption to the lives of occupants, reduced usability of external amenity space, and accessibility issues for users including children and people with disabilities. As noted by the Inspector in the Lodge Road appeal decision:

“Even with mitigation in place, there will always be a residual risk of flooding. If flooding does take place, it can cause significant damage to buildings and their contents, and disrupts the lives of occupants both during a flood and afterwards. It therefore makes sense to avoid such potential harm wherever possible.”

In light of the clear failure of the Sequential Test and the significant flood risk constraints affecting the site, the proposal is contrary to national planning policy relating to flood risk and provide a strong reason for refusal. The policy position is clear that development should not be permitted in such circumstances. Accordingly, as per NPPF footnote 7, the adverse policy conflict arising from flood risk is significant and the tilted balance in favour of sustainable development does not apply in this case.

Affordable Housing:

Policy CP5 of the Core Strategy, Policy TB05 of the MDD Local Plan and the Affordable Housing SPD specify that affordable housing is required when the proposal is for 5+ dwellings or residential developments on a site area of more than 0.16 hectares

The threshold for affordable housing is 5 dwellings or more on residential sites of 0.16 hectares 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, the site is classified as Greenfield and of modest size so a minimum of 40% of the total number of units (net) should be provided as affordable housing. This equates to 1.2 units for this proposal. Due to the site location and nature of the dwellings, 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 £172,244.50 index-linked towards affordable housing in the borough.

Since the application has been recommended for a refusal for various other reasons, no legal agreement is sought to secure the affordable housing contributions. In the absence of any measures to secure the affordable housing, the proposal is considered to be in contrary to policies CP1 and CP5 of the Core Strategy 2010, Policy TB05 and Appendix 12 of the Managing Development Delivery Local Plan 2014 and the Affordable Housing Supplementary Planning Document 2013.

Landscape and Trees:

Policy:

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

Policy CC03 of the Managing Development Delivery Local Plan aims to protect green infrastructure networks, promote linkages between public open space and the countryside, retain existing trees and establish appropriate landscaping.

Paragraph 180(b) of the NPPF requires that planning applications enhance the natural and local environment by 'recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.

Landscape Character:

Wokingham Borough Landscape Character Assessment (WBLCA), dated November 2019, identifies a number of different landscape character areas (LCA's) across the Borough and provides key information regarding each of the LCA's. The site falls within C1 Hurst River Terrace but is very close to the eastern edge of LCA B1 'Loddon River Valley with Open Water'. The character of the site seems more akin to C1 LCA where key characteristics include;

- Simple agricultural landscape of mainly arable farmland, with pasture enclosed in relatively large straight-sided fields, including smaller areas of horse and

pony paddocks.

- Villages located around historic cores including Whistley Green and Hurst, which has a Conservation Area. Newer linear development within these settlements is aligned along the network of roads and rural lanes. There is no strong local vernacular, although there are fine early buildings and building character is unified by the presence of red brick.
- A rural and tranquil area, with only southern edge affected by movement and noise of the M4 and its junction with the A329 (M) and crossed by pylons.

Each LCA has Valuable Landscape Attributes which for C2 in relation to the site include;

Peaceful open character of the undeveloped arable and pastoral landscape, rural settlement pattern of small villages with historic cores unified by red brick. A network of narrow rural lanes and characteristic roadside ditches which contribute to scenic quality. Small wetland habitats including drainage channels and numerous farm ponds valued for flora and fauna.

Key Issues affecting C2 LCA relevant to the site include;

- Hedgerow loss associated with past expansion of fields and intensification of agriculture.
- Demand for residential development increasing linear development along rural lanes and continuing to push towards the amalgamation of close settlements Whistley Green and Hurst impacting rural character. Incremental suburbanisation of buildings.
- Increasing traffic on rural lanes has led to demands for upgrading the winding network of rural lanes with new signage, line painting and widening is threatening the intimate rural character of the lanes.

The Landscape Strategy for LCA C1 is to conserve and enhance the quiet rural and agricultural landscape. There are opportunities to enhance the landscape through restoration and management of hedgerows. In terms of development the aim is to conserve the low density pattern of settlement centred around Hurst and Whistley Green.

The Landscape Guidelines for C2 pertinent to the site include;

Conserve the open and rural qualities of the landscape, conserve and manage hedgerows and hedgerow trees for the links they provide across the landscape for wildlife. Maintain the sparse settlement pattern of villages controlling new development, and avoiding further spread of linear development. Conserve the peaceful and open rural character of the landscape between adjacent village centres and retain their sense of physical and visual separation. Maintain and enhance the character of rural lanes.

Landscape Appraisal

The Council's Trees and Landscape Officer has reviewed submitted Landscape Appraisal (Ref. FOR1578LVA April 2025). The site is described in the LVIA as a 'scrubby' field bound by hedgerows and trees, with some hedgerows in relatively good condition. Noise from Lodge Road is apparent. The site lies within a pocket of residential dwellings, with development to the south from Nursery Close and large detached dwellings to the west and north, suggesting visual connectivity with surrounding areas.

The LVIA notes that, although there are some features of landscape value, the site lacks a coherent composition, with landscape features considered commonplace and affected by man-made elements and human activity, including road noise. The susceptibility of the site to change is assessed as medium, with medium landscape value and overall medium sensitivity. The proposal for three dwellings is considered broadly consistent with the surrounding context, but the Council's Trees and Landscape Officer believes that the site's value as a settlement gap and visual amenity has been underestimated, and that the proposals would have a harmful effect on landscape character.

Field surveys were undertaken at the end of April when deciduous trees were in leaf. The visual impact is expected to be more pronounced in winter months. Changes since 2019 include the timber post-and-rail fence replacing the original northern field gate and relocation of the field entrance to the southern end. A small shipping container remains near the horse-rider warning sign, and the central area appears as maintained lawns in recreational use.

Six viewpoints were assessed: Lodge Road at the access to Nursery Close, four views along Lodge Road, and one view from Tape Lane. Receptors were all road users with medium sensitivity. The Council's Trees and Landscape Officer considers that users of these routes would notice the development and that it would have a moderate to major visual impact.

The site has been the subject of two appeals in 2018 and 2019 (APP/X0360/W/18/3194044), both dismissed. Inspector Major (2019) described the site as lying within Wokingham Borough Landscape Character Assessment Area C2 'Hurst River Terrace', noting flat to undulating topography, scattered settlement linked by rural roads, a working agricultural landscape with fields of varying sizes, hedgerows, and wooded horizons.

The inspector noted that the site is a small field with strong vegetated boundaries providing some enclosure from Lodge Road and that it forms an important component of the open space separating the northern and southern arms of Hurst/Whistley Green. It was not considered exceptional and is not designated as Valued Landscape under NPPF187a. The Council's Trees and Landscape Officer considers that this assessment remains relevant and that the site plays a key role in maintaining the rural character and separation of settlement arms.

The LVIA describes the site as a traditional small-field composition with hedgerows along boundaries and some self-set planting internally. The Council's Trees and

Landscape Officer believes that the LVIA's description of the site as 'lacking coherent composition' is misleading, as the historic field character remains largely unchanged, and overgrown edges reflect lack of management rather than previous design.

Overall, the officer considers the site to be a significant component of the settlement gap. The LVIA states that the proposed development would result in a moderate magnitude of change, minor landscape effect, and major/moderate visual impact. The Council's Trees and Landscape Officer believes that the proposals for three dwellings would have a similar harmful effect on the character and appearance of the site as previous proposals for five or twelve dwellings. The development would fail to respect the transition between the built settlement and the countryside, and the undeveloped land to the north of Badgers Bottom is insufficient to offset this harm. The officer concludes that the proposals would not conserve or enhance the quality of the environment or retain the sense of place, causing a detrimental impact on character and appearance.

Site Layout and Mitigation

The Council's Trees and Landscape Officer notes that no Landscape Strategy Plan is included within or appended to the LVIA, which limits the ability to assess the effectiveness of mitigation measures. Written mitigation in Section 7 outlines objectives to:

- Minimise views from residential areas
- Assist visual integration of the development
- Provide an internal landscape structure and enhance internal road corridors
- Reinforce wildlife corridor opportunities at site boundaries

Mitigation proposals include ornamental planting within residential frontages, building heights reflecting surrounding dwellings, setbacks from boundaries to allow vegetation growth, and use of materials sympathetic to local vernacular.

However, the Council's Trees and Landscape Officer considers that there is insufficient clarity on the management of existing vegetation, integration of scrub and planting areas within private gardens, and the long-term sustainability of mitigation measures. Without detailed plans, the officer believes that the proposed mitigation is unlikely to prevent adverse impacts on landscape character and visual amenity.

Arboricultural Matters

The site contains mature and semi-mature native trees along its boundaries, which contribute significantly to the rural character of the area and provide visual screening. Group G35 on the northern boundary comprises Ash, Cherry, Hawthorn, Oak, Field Maple, and Walnut. Most of the trees within this group are classified as category 'C', are considered incompatible with development, and are proposed for removal. The Council's Trees and Landscape Officer considers that their loss would weaken the boundary enclosure and reduce the site's rural character.

The western boundary along Lodge Road features a mature, unmanaged hedgerow, affected by Ash dieback to varying degrees. While most trees are category 'C' under BS5837:2012, the officer believes this does not diminish their value in defining the settlement gap. Specific trees along Lodge Road, including T9, T10, T11, and T12, are recommended for removal. Two category 'U' Ash trees north of the site entrance and a further two category 'C' Ash trees to the south are also proposed for removal. No replacement planting is indicated, and the officer considers that this would result in a substantial loss of boundary screening and increased visibility of any new dwellings within the settlement gap, undermining the rural character.

The western boundary hedge varies in height from approximately 4–17 metres, is deciduous, and includes significant Ivy growth on taller stems. The hedgerow is located less than a metre from the road edge, and the proposed visibility splays for the site entrance conflict with the existing vegetation. The Council's Trees and Landscape Officer notes that the Arboricultural Impact Assessment (September 2025) fails to provide sufficient detail regarding the extent of tree and hedgerow removal or proposed replacement planting, limiting the ability to assess arboricultural impacts accurately.

Within the site, areas of scrub, particularly along the southern and eastern boundaries, include regenerating Aspen and Blackthorn. Some scrub areas appear to be retained, while others may be incorporated into private gardens or replaced with new planting. The officer considers that the limited information on species composition, tree condition, and long-term management makes it difficult to evaluate the potential arboricultural impact of the development fully.

Overall, the Council's Trees and Landscape Officer believes that the site's boundary trees and hedgerows are an important component of visual enclosure and the rural character of the area. The proposed development would result in the removal of key trees, a reduction in hedgerow continuity, and greater visual exposure of the site. The lack of detailed replacement and management proposals raises concerns regarding the long-term sustainability of the vegetation and the adequacy of mitigation measures, and the officer objects to the scheme on these grounds.

Ecology:

Policy:

Core Strategy policy CP7 states that:

“Development [...] Which may harm habitats or, species of principle importance in England for nature conservation, veteran trees or features of the landscape that are of major importance for wild flora and fauna (including wildlife and river corridors), whether directly or indirectly, [...] will be only permitted if it has been clearly demonstrated that the need for the proposal outweighs the need to safeguard the nature conservation importance, that no alternative site that would result in less or no harm is available which will meet the need, and:

- i) Mitigation measures can be put in place to prevent damaging*

- impacts; or
- ii) *Appropriate compensation measures to offset the scale and kind of losses are provided.”*

MDD policy TB23 states that:

“Planning permission for development proposals will only be granted where they comply with policy CP7 – Biodiversity of the Core Strategy and also demonstrate how they [...] Provide appropriate buffer zones between development proposals and designated sites as well as habitats and species of principle importance for nature conservation.”

This application is supported by a Preliminary Ecological Appraisal (AKB Ecology, 24-041-PEA-v1, February 2025).

Bats

The Ecology Officer notes that the applicant’s ecologist has assessed the rural, isolated trees within the centre of the site as offering negligible potential for roosting bats and based on the photographs provided considers this conclusion to be reasonable. However, the officer raises concern that the applicant’s ecologist has not categorised the roosting potential of the boundary trees or assessed the flight routes and foraging potential of the site in accordance with the guidelines of the Bat Conservation Trust.

The site contains tree lines along the eastern and western boundaries, with younger treelines to the north. The Ecology Officer notes that the applicant’s submission does not categorise the roosting potential of trees within these treelines or provide a full assessment of activity and foraging potential, which deviates from best practice guidance. Notwithstanding this omission, the Ecology Officer considers that the proposed development is unlikely to result in direct harm to bats due to the approximate 16 metre buffer between the proposed built development and the identified foraging and commuting routes along the site boundaries.

However, the Ecology Officer highlights that the height of the proposed dwellings, combined with integrated lighting mounted at higher wall levels, has the potential to illuminate a wider area. This may disrupt commuting corridors and negatively affect light-sensitive bat species. A sensitive lighting approach is therefore required to ensure that artificial lighting does not adversely affect the surrounding treelines, scrub or woodland. These areas are likely to support nocturnal and diurnal European Protected Species such as bats and badgers, as well as species of principal importance including certain invertebrates and hedgehogs.

The Ecology Officer advises that a sensitive lighting plan, which could be secured by condition in the event of any approval.

The report also recommends that species-specific biodiversity enhancements be incorporated into the development. These could include measures such as the installation of integrated bird and bat boxes within the proposed dwellings. In the event that planning permission were to be granted, details of such enhancements, including the specification and location of bird and bat boxes, could be secured by condition.

Great Crested Newts

The development falls within the red impact risk zone for great crested newts. There are 5 ponds within 500m of the development proposal, the closest of which being c.220m from the site but

A District Licensing Officer, acting on behalf of NatureSpace, reviewed the ecological information submitted for the site, including a Preliminary Ecological Appraisal (February 2025) and a Great Crested Newt (GCN) survey letter (April 2025).

The appraisal identified areas of suitable habitat to be retained, including scrub, and rubble piles requiring deconstruction under precautionary working methods. A wet ditch noted in January was dry by April, allowing works under a precautionary working method statement (PWMS). While the risk of encountering GCN is considered low, the officer recommended avoidance measures prior to and during construction, to be provided by a suitably qualified ecologist and approved by the local planning authority. Retention of suitable habitat features where possible is advised. The officer also highlighted the option to use the Wokingham Borough Council District Licence for GCN mitigation or, alternatively, an informative requiring works to cease if GCN are discovered, in line with statutory protections. A suitable condition could be attached to secure a licensed mitigation (where required) in the event of any approval.

Badgers

Badgers are known to be present near the application site, and it is likely that they use the site to some extent for foraging.

Should permission be granted, a construction method statement should be secured by condition to ensure works do not harm badgers or their setts. This should include a pre-commencement ecological survey and precautionary site measures to prevent disturbance, injury, or the creation of new setts during construction.

Biodiversity Net Gain

Mandatory biodiversity net gain of 10%, as outlined in the Environment Act 2021, applies to this development proposal.

A Preliminary Ecological Appraisal (PEA) and a Biodiversity Net Gain (BNG) Assessment have been submitted, both of which identify modified grassland as the baseline habitat. However, the Ecology Officer advises that the baseline cannot currently be verified. The BNG Assessment refers to a separate grassland survey report and condition assessment sheets, but these documents have not been provided as part of the submission.

The Ecology Officer therefore notes that, without the grassland survey and associated condition sheets, it is not possible to confirm the habitat condition or understand the justification for the condition categories applied. This is particularly relevant as the biodiversity metric identifies four different types of modified grassland with varying condition scores, whereas the submitted reports refer only to modified grassland in general terms.

Until the missing grassland survey and condition assessment sheets are submitted, the Ecology Officer advises that the baseline habitat position cannot be confirmed and the BNG calculation cannot be validated.

The Ecology Officer notes that the submitted biodiversity metric includes a post-development scenario. However, it would not be appropriate at this stage to approve the detailed habitat proposals. A significant proportion of the on-site habitat units are attributed to the enhancement of woodland and modified grassland to neutral grassland, together with the creation of mixed scrub and a non-priority pond. To ensure these habitats are appropriately managed for a period of 30 years, the Ecology Officer advises that details of management and monitoring should be secured through a Habitat Management and Monitoring Plan (HMMP). The officer therefore recommends that a planning obligation be secured to ensure monitoring of the proposed on-site biodiversity net gain measures in accordance with the HMMP.

As this application is being recommended for refusal on several other grounds, this grassland survey was not requested. Its absence will form part of the general Ecological reason for refusal based on the comments provided above on Biodiversity Net Gain

Archaeology:

There are potential archaeological implications with this proposal as evidenced by Berkshire Archaeology's Historic Environment Record (HER). The application site lies in an area with high archaeological potential in part due to the number of find spots locally for Mesolithic flints.

This application proposes a development on a reasonable scale within an area that has not previously been developed. In view of the archaeological potential of the application site, it is considered reasonable that a condition is attached in case the application is recommended for approval for further archaeological investigations to be carried out prior to the commencement of the proposed development.

Contamination:

The site is identified as potentially contaminated on the Wokingham Borough Council GIS mapping system. In the event that planning permission were to be granted, it would be necessary to attach a condition requiring a thorough site investigation to identify any contamination. Where contamination is found, appropriate remedial or protective measures would be required to ensure that risks to human health, controlled waters, and the wider environment are adequately managed both during and after construction..

Planning Balance:

The starting point for decision making is the development plan. Section 70[2] of the TCPA 1990 & 38[6] of the PCPA 2004 states that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. The plan-led approach advocated by law

is reinforced numerous times throughout the NPPF including paragraph 47:

'Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.'

The Council cannot demonstrate 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. 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.

Whilst the policies which are most important for determining the application are out of date by virtue of the absence of a 5 year housing land supply, that does not mean the policies carry no weight. The weight attached to the development plan policies is a matter for the decision maker(s).

Economic:

It is acknowledged that the site would perform a limited short term economic role as a result of the construction period, and a modest longer-term economic role via consumer spend and CIL liable payments. As the number of homes proposed is limited however, the weight afforded to their provision is also limited. These are residual consequences of any housing development.

Social:

The development would make a small contribution to the boroughs housing stock in the creation of three new homes and a modest longer-term economic role via local consumer spending and CIL liable payments. Similar to the economic performance though, the limited number of homes proposed also limits the weight applied to their benefits in the planning balance.

Environmental:

The development could reasonably be expected to demonstrate a degree of inherent sustainability through compliance with Council supported energy efficiency and Building Regulations standards. There would also be an ability to impose conditions securing biodiversity enhancements to the site, as well as new/additional landscaping. However, these measures would not outweigh the already highlighted landscape harm, biodiversity net loss on site and the fact the occupiers of the dwellings would be overly reliant on private motor vehicles to access basic amenities and services. Overall, the environmental performance of the development would be negative.

Disbenefits:

The site is located outside the defined settlement boundary within the open countryside and therefore conflicts with the Council's spatial strategy. The site forms an important rural gap and visual break in the landscape, a role previously identified by an appeal Inspector as contributing to the separation between the northern and southern arms of the Hurst and Whistley Green settlements. The introduction of domestic built form in this location would erode this transitional area, resulting in

encroachment into the countryside and contributing to the coalescence of these settlements, thereby failing to maintain the high quality of the rural environment. Furthermore, the site represents an unsustainable location for residential development due to its limited accessibility to services and facilities by sustainable transport modes. The proposal also fails to adequately address the significant fluvial, surface water and groundwater flood risks affecting the site.

Conclusion

In engaging the tilted balance, those adverse impacts (as set out in the foregoing) as a result of the proposed development are considered to **significantly and demonstrably** outweigh the limited benefits of this scheme when assessed against the framework as whole. The recommendation is therefore to refuse planning permission.

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.

The Public Sector Equality Duty (Equality Act 2010):

In determining this application the Council is required to have due regard to its obligations under the Equality Act 2010. The key equalities protected characteristics include age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation. There is no indication or evidence (including from consultation on the application) that persons with protected characteristics as identified by the Act have or will have different needs, experiences, issues and priorities in relation to this particular planning application and there would be no significant adverse impacts as a result of the development.

RECOMMENDATION

Conditions agreed:	Not required
Recommendation:	Refuse
Date:	2 March 2026
Earliest date for decision:	9 February 2026

Recommendation agreed by: (Authorised Officer)	<i>BJC</i>
Date:	16.03.26

