

Application Number	Expiry Date	Parish	Ward
230208	11.08.2023	Winnersh	Winnersh

Applicant	Taylor Wimpey Strategic Land
Site Address	Land located to the east of Watmore Lane/Maidensfield, Winnersh
Proposal	Outline application with all matters reserved except access for the proposed erection of up to 234 dwellings.

RELEVANT PLANNING HISTORY

O/2013/0434: Outline application for a proposed residential development of up to 150 dwellings, public open space, landscaping and associated works. Means of access to be considered. Refused: 16.08.2013

173656: Outline planning application with all matters reserved except for access, for a phased residential development of up to 250 dwellings, public open space, landscaping and associated works. Withdrawn.

222258: Screening Opinion application for an Environmental Impact Assessment for the proposed 250 dwellings with associated access and infrastructure. Replied: Not EIA Development.

DEVELOPMENT INFORMATION

Proposed units	234
Proposed density - dwellings/hectare	Gross density of 20.6dph. Average density of developed areas 34.6dph
Number of affordable units proposed	94
Previous land use	Agriculture
Existing parking spaces	N/A
Proposed parking spaces	N/A (reserved matter)

CONSTRAINTS

Countryside
Flood Zone 1, 2 and 3
Low Risk of Surface Water Drainage
Potentially contaminated land consultation zone
Tree Preservation Order
Landfill Gas Consultation Zone
Potentially Contaminated Land Consultation Zone
Great Crested New Consultation Zone
Minerals Safeguarding Area
Ancient / Veteran Trees.

CONSULTATION RESPONSES

WBC Highways	No objection subject to conditions
WBC Trees and Landscape	

WBC Ecology	Objection – harm to the character and appearance of the area
WBC Drainage	No response
WBC Environmental Health	No objection subject to conditions
Berkshire Archaeology	No objection subject to conditions
Environment Agency	No response
Thames Water	No response
NHS	No objection subject to conditions
Woodley Surgery	Contribution requested for Primary Care funding
Royal Berkshire Fire and Rescue	Further information provision of care
Forestry commission	Nearby pharmacy has closed down
National Grid	No objection
	Neither support no object.
	No affect any NG apparatus.

REPRESENTATIONS

Town/Parish Council: Objection

The road known as Maidensfield is a cul-de-sac with 3 smaller roads and a total of approximately 60 dwellings. The road is heavily parked in between the junctions and vehicle access points to houses fronting the road. It is only 5.5m wide and is not a straight road. Wokingham BC's design guide table A1 indicates a maximum of 200 dwellings for this type of road and this is dependant on the road layout and parking.

Maidensfield is not suitable to take this development of up to 234 dwellings with the existing 60 dwellings making a total of almost 300 units.

The existing sight line at Eastbury Park (cul-de-sac minor access road) will become a main junction from the development and the sight-line does not meet the standard required in Manual for Streets nor does the junction with Maidensfield and Watmore Lane.² Both of these streets are heavily parked with Winnersh Primary School located off Watmore Lane. Additional traffic on these two roads will create significant congestion generated by the development.

The additional traffic generated by the development will create more air pollution. However, with the use of unsuitable roads as described above, the added congestion and idling will enhance the pollution levels in residential streets especially NOx and PM 2.5.

This is now a tight bend in the road network and just copes with the existing traffic. Additional traffic being generated from the development will enhance this as a road safety issue, not only for motorists but also for pedestrians as it is a key crossing point to access both Winnersh and Wheatfield Schools.

The development falls outside the standard 10-minute walking distances of 10 minutes to access the railway station at Winnersh (Robin Hood Lane and the bus stops located on Reading Road (outside Sainsbury's) and Robin Hood Lane. Only one bus stop (located on the Reading Road near Woodward Close (towards Wokingham/Bracknell)) appears to be within the 10-minute walking radius. With this in mind the first option of travel would be to drive.

Since the opening of the Winnersh relief road, the crossroads still remains busy at peak times. Additional traffic from the development will tip this balance and create congestion again, especially on Robinhood Lane.

We raised objections to the application in 2013 as Thames Water concerns had raised that there was insufficient capacity to serve the site with a water supply and wastewater. This may still be the case.

Local Members:

Cllr P Bray:

The first two applications were for 250 dwellings, in 2 phases of development. This application is for 234, with a small area of green space having replaced housing at the top of the plan near Grovelands Park. Other than that change, the layout is virtually identical to the previous applications, including the open space towards the Emmbrook. The only significant difference is that the current plan includes a road which runs to the boundary next door to where the new special school is being constructed, with the illustrative plan showing a link to a road on council land next to the new school, clearly suggesting a potential second access. No such access exists, the road does not exist, application 212404 which includes such a road, has not been approved, and no deal has been struck with Taylor Wimpey by the council to provide an access, as the proposal was withdrawn from the Executive meeting of March 2022 and has not come back. This is therefore clearly speculative and should not be given any weight.

The applicants cited the lack of 5 year housing land supply in both 2013 and 2017 as a reason why permission should be given, but were not successful. The lack of a 5 year land supply does not compel a planning application to be approved if there is evidence that granting permission would cause harm. The point of access is in Maidensfield, which has approximately 60 dwellings, meaning the total cul de sac would consist of over 300 dwellings.

The access comes out onto Watmore Lane, a minor residential road, approximately doubling the number of properties served by the Watmore Lane/Danywern Drive arc. There are no other possible access points for vehicles, nor for pedestrians or cyclists. There is therefore no choice of route or connectivity whatsoever, contrary to the Borough Design Guide. In addition the existing roads are not of sufficient width to take this volume of traffic. I believe that the 7 reasons for refusal in 2013 for O/2013/0434 are still relevant and should be looked at as part of the assessment of this application. I strongly oppose it.

Cllr P Fishwick:

This is the third planning application submitted for this site. The first application was for a proposed residential development of up to 150 dwellings, public open space, landscaping and associated works (Planning application number 132199) for 2013 was submitted in 2010 and was refused by the Planning Authority Wokingham Borough Council. The second application for a phased residential development of up to 250 dwellings, (Planning Application number 173656,) was withdrawn in 2018.

The application now submitted is an outline application with all matters reserved except access for the proposed erection of up to 234 dwellings. This is a significant increase compared to the application for up to 150 dwellings that was refused in 2013.

Reasons for objection. I wish to strongly object to this new application on the following grounds.

1, The application is for up to 234 dwellings and the proposal is to use Maidensfield as an access to the development.

Maidensfield is an existing cul-de sac (Tertiary street described as access to dwellings with no through movement. Minor Access Road) and also has three smaller roads leading off with a total of approximately 60 properties. The carriageway width of Maidensfield is approximately 5.5m with 1.8m footways on either side.

Wokingham Borough Council's Living Streets A Highways Design Guide 2019, under table A1 of this design guide indicates that, the 5m width is a minimum width for a tertiary street up to a maximum of 200 and subject to parking and road layout.

Maidensfield is a cul-de-sac with 3 junctions for small roads leading off, bends and parking away from dwelling access points. This road is NOT suitable for the additional up to 234 dwellings as proposed. This would take the total number of dwelling to close to 300.

The table A1 indicates that a suitable road for this number of dwellings would be a secondary road, which is described as connecting to primary streets and access to dwellings. Major Access Road. It suggests a carriageway of 6.5m to 5.5m (minimum) but widening on bends to accommodate tracking of vehicles.

Maidensfield is clearly not a secondary street and cannot accommodate the development proposed and therefore must be refused by the Planning Authority.

2, Watmore Lane and Dannywern Drive. Both roads have evolved over 100 years ago. They both have many junctions leading to a large number of dwellings that generate a significant number of private car trips. The original Watmore Lane junction with Danywern Drive became a 'tight' bend when the Woodward Close development was carried out.

The Highways Design Guide (page 19) describes a Secondary street as follows;

Secondary Streets are residential streets that will normally be accessed from primary streets and will include some 'through traffic' facilitating access to tertiary streets and shared surface areas. An example would be the development at South of Croft Road in Spencers Wood where a central spine road routes through the development. They will often be fronted by housing on either side with limited direct access and on street parking will be in lay-bys. The main carriageway will be 5.5m-6.1m with 6.1m minimum required if it is a bus route. On bends there is some widening defined by TRACK analysis.

Both roads have substantial on street parking and numerous direct access points and cannot be classed as a secondary street. Therefore, additional traffic from the proposed development cannot be allowed to use these roads as they are unsuitable and the application refused.

3, The sight-line at the junction of Maidensfield and Watmore Lane does not meet the standard required as set out the guidance/Manual for streets.

4, The existing roads of Maidensfield, Watmore Lane, and Danywern Drive are heavily parked with vehicles from the existing residential units and Winnersh Primary School. However, if additional dwellings were added to the existing road layout this would cause congestion on an increasing scale as drivers negotiate parked vehicles. This in turn increases air pollution especially nitrogen dioxide (NO₂) and Particulate Matters 2.5 from increased and idling traffic. Therefore the development will add to air pollution and go against the Climate Change emergency and must be refused.

5, The development falls outside the standard walking distance of 10 minutes to access the railway station at Winnersh (Robin Hood Lane and the bus stops located on Reading Road (outside Sainsbury's) and Robin Hood Lane. Only one bus stop (located on the Reading Road near Woodward Close (towards Wokingham/Bracknell) falls within the 10-minute walking radius. With this in mind the first option of travel would be to drive. Therefore, the development is not sustainable and must be refused.

6, Due to the additional traffic generated by the development Maidensfield, Watmore Lane and Danywern Drive will become unsuitable and unsafe for cycling, therefore with facilities outside of the standard walking distance and unsuitable for cycling the site does not have a sustainable transport solution. It therefore must be refused.

7, Since the opening of the Winnersh Relief Road, constructed to cater for the recently built and future planned housing in the current Local Plan, the Winnersh crossroads junction has seen an easing of the congestion observed at peak times both am and pm. However, additional traffic will be generated by other developments still to be built and included within the Local Plan. Therefore, capacity will become a significant issue again impacting public transport. Additional traffic from this development will only exacerbate this.

8, The application indicates an access road that stops at the 'southern boundary' near the SEND school. However, a previous application, 212404 which included a road was not approved and the Council has not agreed to provide access adjacent to the SEND school, as the proposal was withdrawn from the Executive meeting on 31st March 2022. Therefore, this is speculative and should not be given any weight.

9, There were seven reasons why the previous application in 2013 was refused and I believe that the situation hasn't changed especially with a more substantial development proposed.

10, The application in 2013 also had concerns raised by Thames Water in that there was insufficient capacity to serve the site with a water supply and wastewater. This is another reason to refuse this application.

Neighbours: 204 objections (some duplicate submissions) raising the following issues:

- Maidensfield is not suitable for the level of traffic proposed.
- Danywern Drive and Robin Hood Way are not suitable for the level of traffic proposed.
- Insufficient sight lines.
- There is on street parking along Maidensfield and existing parking issues in the area.
- Increase in traffic will put more pressure on congested junctions.
- Increase in traffic will impact how residents use the cul-de-sac.
- Impact on pedestrians.
- Maidensfield is a narrow road.

- Impact on highway safety along Maidensfield.
- There is no agreement in place for the second access.
- The second access will result in additional congestion.
- Negative impact on cyclists.
- Road modelling should be undertaken.
- Noise will impact future residents.
- Air quality and pollution is affected by the nearby motorway.
- Risk of flooding on the site.
- A previous application has been refused and a another application was withdrawn.
- It will affect children walking to school.
- It will result in additional congestion.
- Development of the site has been refused previously.
- Doctors and dentist surgeries are fully subscribed.
- There are waiting lists for the local schools.
- Walking to facilities within the area will not be realistic.
- Insufficient capacity to deal with waste water.
- Single access road violates the WBC Highways Design Guide which states 200 houses at maximum.
- Serves no benefit by adding a local shop, a new doctors surgery, a new school etc.
- Impact of water run-off along the Emmbrook.
- Loss of open green space.
- Impact on biodiversity and wildlife.
- Loss of wildlife and habitats.
- Impact on existing infrastructure.
- Public Transport in the area is poor.
- The LPU should not be given any weight.
- Winnersh has too many houses for the associated infrastructure.
- Impacts the title deeds to properties (*Officer Note: this is a civil matter between parties and not a material consideration*).
- Loss amenity to the residents along Maidensfield due to the change in character and use of the road.
- The land is outside of settlement limits.
- The affordable houses will not be affordable to local residents.
- Impact on character and appearance of the area.
- Residents will be reliant on cars and will not walk to local services.

PLANNING POLICY

National Planning Policy Framework

National Design Guide

National Planning Practice Guidance

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 (Inc Countryside)
CP17 – Housing Delivery

MDD Local Plan (MDD

CC01 – Presumption in Favour of Sustainable Development
CC02 – Development Limits
CC03 – Green Infrastructure, Trees and Landscaping
CC04 – Sustainable Design and Construction
CC06 – Noise
CC07 – Parking
CC09 – Development and Flood Risk
CC10 – Sustainable Drainage
TB05 – Housing Mix
TB07 – Internal Space Standards
TB08 – Open Space, Sport and Recreational Facilities Standards
TB12 – Employment Skills Plan
TB21 – Landscape Character
TB23 – Biodiversity and Development
TB25 – Archaeology

Other

Borough Design Guide Supplementary Planning Document
CIL Guidance + 123 List
Affordable Housing Supplementary Planning Document
Sustainable Design and Construction Supplementary Planning Document
Joint Minerals and Waste Plan 2023

PLANNING ISSUES

Description of Development:

1. The application site is an undeveloped greenfield site on the edge of the settlement of Winnersh. To the north of the site the residential area of Grovelands Park whilst to the west is the residential streets of Maidensfield and Winnersh Gate. To the east is the Emm Brook which is lined with trees and vegetation. The site is further surrounded to the east and south by the M4, M329(M) and associated slip roads and infrastructure. To the south of the site is Wheatfield Primary School and a new SEN School under construction.
2. The application is for outline permission for the erection of up to 234 dwellings with all matters reserved apart from one access. The proposed accessed will be via Maidensfield, which is a residential cul-de-sac with small mews' and roads located off it. The access will include a 5.5 metre wide carriageway with two 2 metre wide footpaths either side. Whilst a southern access is shown on indicative drawings, this is not part of this application and the applicant does not have control over the land to the south, which is owned by WBC.
3. The indicative parameter plan shows the residential areas would be located to the east of the site whilst informal open space would be located to the west, adjacent to the Emm Brook. There would be opportunities for a play areas, and attenuation ponds as part of Sustainable Urban Drainage Scheme (SUDs) in the parameter plan layout.

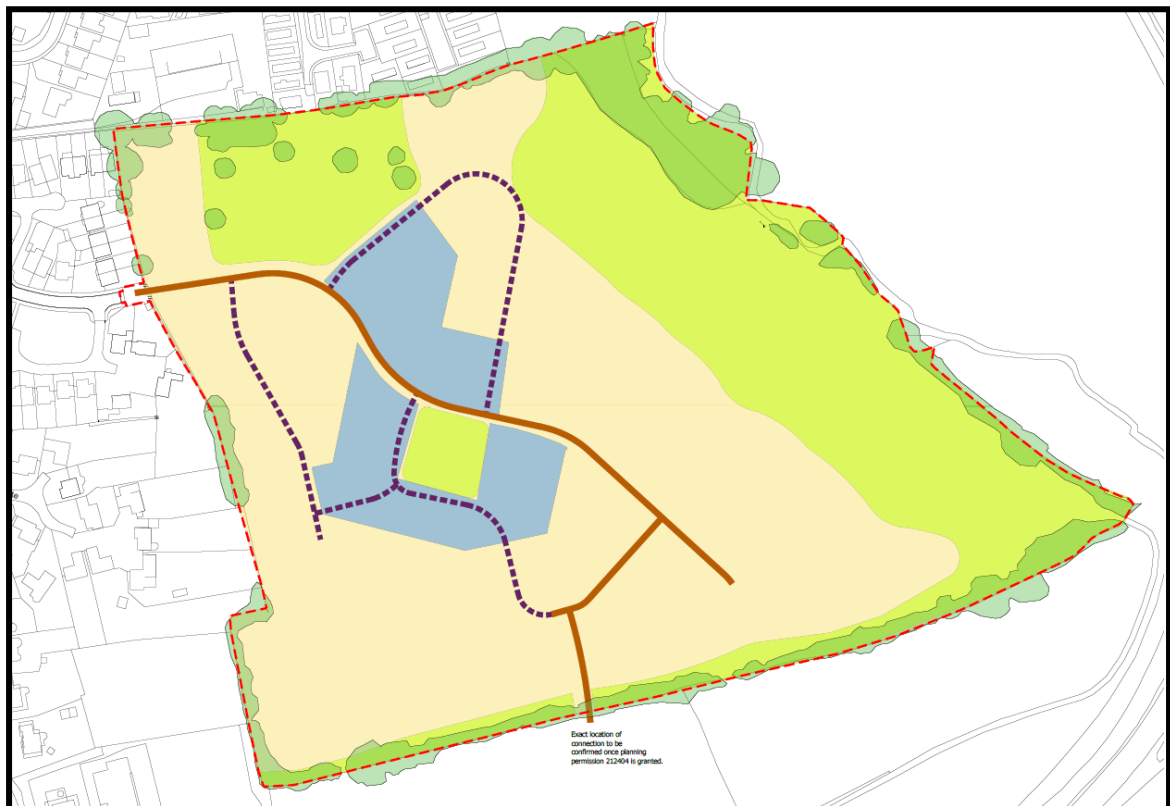


Fig 1. Parameter Plan

Principle of Development:

4. 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 established in law is reinforced through 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.'

5. Paragraph 17 and 20 of the NPPF state the development plan must include strategic policies to address each local planning authority's priorities and an overall strategy for the pattern, scale and quality of development.
6. The Development Plan includes the Wokingham Local Development Framework Core Strategy (adopted in January 2010) and the Wokingham Development Plan Managing Development Delivery Local Plan (adopted in February 2014) MDD Local Plan. The Core Strategy and MDD Local Plan sets out the vision for the borough and the policies to achieve those objectives. The core spatial strategy established by the Core Strategy was informed by engagement of the community.
7. The NPPF has an underlying presumption in favour of sustainable development which is carried through to the local Development Plan. Policy CC01 of the MDD Local Plan 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.

Development Plan - Core Strategy and MDD Local Plan

8. The Core Strategy and MDD Local Plan sets out the vision for the borough and the policies to achieve those objectives. The core spatial strategy has been informed through the Local Plan process with the engagement of the community. A priority of the development plan is steer new housing to the most sustainable locations within settlement boundaries and limit development within the countryside. This is, among other things, in order to promote sustainability, maintain the quality of the environment, protect the separate identity of settlements and provide certainty regarding how the borough will be developed. It is also well-explained in the Borough Design Guide at pages 6 -7.
9. The vision explains that in order to deliver the necessary development, the Council has identified a number of high-quality Strategic Development Locations (SDLs) where the majority of the minimum 13,230 new houses to be delivered in the CS Plan period will be located. This approach seeks to locate schemes where they can provide easy access to existing facilities or where improvements are readily deliverable. In addition, the vision seeks to concentrate development in those towns and villages that either have a significant range of infrastructure including facilities and services now - or will have them as a result of the development proposed through the Core Strategy. Development is stated to be less likely in locations where these facilities and services will not be available.

10. Policy CP9 of the Core Strategy and CC02 of the MDD Local Plan states that proposals will be permitted within development limits where the scale of the application reflects the facilities and services within the settlement. The settlements are split into three categories depending on the sustainability of those locations; Major, Modest and Limited development locations. Policy broadly steers Major developments to sustainable Major settlements with the best services, facilities and infrastructure. The definition of development limits recognises the consistent approach in planning to identify appropriate and sustainable areas for development.
11. The application site is not within any settlement limits and is within the countryside. Therefore, an assessment against policy CP11 of the Core Strategy is also required. This refers to development within the countryside and states *'in order to protect the separate identity of settlements and maintain the quality of the environment, proposals outside of development limits will not normally be permitted'*, other than the exceptions listed. The proposed development would not fall within any of the exceptions set out in policy CP11 and would fail to comply with this development plan policy.
12. Whilst the site is not within Winnersh itself, it adjoins the boundary of the development limit to the west and north and as a result would effectively result in a minor expansion of this Major Development Location. The Glossary in the MDD Local Plan states these settlements *'are those with the greatest range of facilities and services which allow residents the greatest choice in modes to access them. It is it within the development limits of these settlements where major development (including urban extensions within these limits) would be acceptable.'*
13. In summary, the location of this development is not in accordance with the development plan, taken as a whole. This is because by seeking to develop this countryside location, outside the Winnersh settlement boundary, for a large-scale housing scheme, the proposal would be at odds with the spatial strategy for the Borough, set out at Section 3 of the Core Strategy, and would conflict with a number of adopted policies such as Core Strategy Policies CP9 and CP11, as well as MDD Local Plan Policy CC02.

Emerging Local Plan Update

14. The site is part of the proposed allocation in the Local Plan Update (LPU) Revised Growth Strategy 2021. The LPU will on adoption supersede the adopted Core Strategy and MDD Local Plan but at present, the LPU is at the consultative stage of preparation. To date, the Council has consulted on two draft strategies for the LPU: the Draft Plan (2020) and the Revised Growth Strategy (2021).
15. The proposed allocation drew upon the Housing and Economic Land Availability Assessment (HELAA) (2021) which considered the broad suitability, availability and achievability of land promoted across the borough. The assessment of the site (5WI006), was on the basis of a wider site which included other parcels of land to the south, including an access from Woodward Close. The assessment concluded that this wider area was potentially suitable for development, stating, *'the sites are*

adjacent to the major settlement of Winnersh and development would achieve a satisfactory relationship with the existing built-up area, forming a logical extension.'

16. Given the LPU is at a consultative stage, the draft strategy and related draft policies have limited weight in determining planning applications. It must also be recognised that the assessment of land in the HELAA is high level with the purpose of informing options within plan-making and that the assessment was on the basis of a wider site. The assessment made in the HELAA is not comparable to a planning application, however, is nonetheless useful in providing an understanding from a plan-making perspective.

National Planning Policy Framework

17. The NPPF is a material consideration in the decision-making process. The NPPF outlines the Government's planning policy on a national level and highlights sustainable development as the centre of the decision-making process incorporating economic, social and environmental objectives. These three objectives seek to balance growth and local community needs against the protection of the natural, built and historic environment. It does not however change the status of the development plan as the starting point in the decision-making.

Housing land supply

18. To achieve sustainable development, the NPPF requires LPAs to identify a five-year supply of specific deliverable sites to meet housing needs. However, against this requirement, the Council is currently only able to demonstrate 3.95 years' worth of deliverable sites, rather than a five-year supply required. Subsequently, policies CS Policies CP9 and CP11, as well as MDDLDP Policy CC02 identified above, which are most important for determining applications for new housing, are considered out-of-date in accordance with Paragraph 11 of the NPPF.
19. Paragraph 11 states that where policies which are most important for determining the application are out-of-date, permission should be granted unless:
 - the application of policies in the Framework that protect assets of particular importance provides a clear reason for refusing the development; or
 - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.
20. Firstly, in considering i), it must be recognised that the proposed site is not located within any protected areas or assets of particular importance (as outlined above and within footnote 7 and paragraph 181 of the NPPF). Officers must therefore consider the application under ii) and determine whether there are any adverse impacts generated by the development that would significantly and demonstrably outweigh the benefits. This is referred to as the 'tilted balance', as harm and benefits are not weighed equally, but tilted against any adverse impacts.
21. In acknowledging the requirements of paragraph 11(d) ii) and the titled balance being engaged, it is necessary to consider the underlying reasons for the shortfall in deliverable sites in order to understand whether there are any circumstances which affect the degree to which the tilted balance is engaged.

22. Firstly, the identified shortfall is acknowledged to not be a result of under-delivery of housing but is in fact due to a significant over delivery in recent years, reducing the bank of land with extant planning permissions. All evidence and assessments show that whether the housing target is defined through the requirement set out in the Core Strategy or the outcome of the standard method set out in National Planning Practice Guidance, delivery has significantly exceeded the target. If over delivery was taken into account over the whole Core Strategy plan period or since the introduction of the standard method, there would be no shortfall over the coming five years with over delivery significantly exceeding the shortfall.
23. In this context, the weight to be attached to the benefits of additional housing under paragraph 11 of the NPPF should be moderated. This reflects the approach set out in the Willow Tree House Application ref 203560, Appeal ref: APP/X0360/W/21/3275086), Land at Baird Road (Application ref 202303, Appeal ref APP/X0360/W/21/3276169) and Land to the west of St Anne's Drive and south of London Road (Application ref 203544, Appeal ref APP/X0360/W/22/3297645) appeals, where the Inspectors only applied moderate weight to the provision of additional housing.
24. In the case of the former two appeals, the Inspector continued to consider the adverse impacts and dismissed the appeals. In the case of land to the west of St Anne's Drive, the Inspector acknowledged the Council's strong record of housing delivery, which he concluded could be said to have significantly boosted the supply of housing. Given this strong record of housing delivery performance, the Inspector noted:

'Under these circumstances, I consider that moderate weight is attributed to the modest contribution that the appeal scheme would make towards housing land supply in the area and reducing the shortfall in the 5-year supply of deliverable housing sites, which is itself limited.' (paragraph 45)

25. These three appeals were all determined before the most recent housing land supply statement was published. Based on the previous housing land supply statement, housing land supply was considered by the Inspectors to be between 4.34 to 4.92 years. Nevertheless, this conclusion was reinforced by an Inspector following a recent appeal decision at Land East of Lodge Road, Hurst for 200 houses (Application ref: 220458, Appeal ref APP/X0360/W/22/3309202) and was determined using the most recent housing land supply statement of 3.95 years. The Inspector noted:

'In view of these points, and even though the Council is currently unable to demonstrate a deliverable 5-year HLS, falling short by some 863 dwellings, I do not consider it reasonable to ignore the bigger picture, which is that there is a very strong likelihood that the Council will achieve a significant oversupply of dwelling completions over the whole CS period. To my mind this does not signify a Council that is failing in terms of housing provision, but rather one which is performing well and managing to boost the supply of housing over that which it planned for.'

[...]

'Turning to consider the CS's spatial vision, I see nothing in the evidence placed before me to indicate that the Council's chosen method of distributing new

housing throughout the Borough has prevented it from achieving satisfactory housing delivery to date.'

26. Taking the Inspector's conclusions from these appeal decisions into consideration, it would indicate that whilst the tilted balance is engaged, this tilt is tempered due to past over delivery for those reasons outline above. It is however relevant that the Lodge Road Inspector gave substantial weight to the provision of open market and affordable housing.
27. Having established the tilted balance is 'tempered', Paragraph 11d(ii) requires the proposal to be considered against the policies of the NPPF taken as a whole.

Minerals and waste:

28. The eastern part of the site is partially located within a Minerals Safeguarding Area. Policy M2 of the 2023 of the Joint Minerals & Waste Plan states that non-minerals development in the Minerals Safeguarding Area may be permitted if it can be demonstrated through the preparation of a Mineral Resources Assessment, that the option of prior extraction has been fully considered as part of an application, and:
 - a. Prior extraction, where practical and environmentally feasible, is maximised, taking into account site constraints and phasing of development; or*
 - b. It can be demonstrated that the mineral resources will not be permanently sterilised; or*
 - c. It would be inappropriate to extract mineral resources in that location, with regard to other policies in the wider Local Plans.*
29. Information has been submitting by the applicant setting out that extraction from the site would inappropriate. The minerals safeguarding area is within Flood Zone 2 and 3 and covers the Emm Brook, which is an important natural feature. There are also areas of Ancient Woodland within this area, that are protected by policy DM3 of the Joint Minerals and Waste Plan. The proximity of schools and residential dwellings would also compromise the ability for such development without detrimentally impacting amenity. Overall, it is considered that the extraction of material in this location would be inappropriate.

Impact on character and appearance of the area:

Countryside and Landscape

30. Policy TB21 of the MDD 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 and proposals shall retain or enhance the condition, character and features that contribute to the landscape.
31. Policy CC02 of the MDD Local Plan reinforces the development limits of each settlement area stating that '*planning permission for proposals on the edge of settlements will only be granted where they can demonstrate that the development, including boundary treatments, is within development limits*'. Policy CC03 states that development should promote the integration of the scheme with any adjoining public

space or countryside and proposals that result in the loss, fragmentation or isolation of areas of green infrastructure will not be acceptable.

32. The site is located within landscape character area J1 'Wokingham and Winnersh Settled and Farmed Clay' in the Landscape Character Assessment. The landscape character of J1 'Wokingham-Winnersh Settled and Farmed Clay' is judged to be of low quality and weak character overall and the landscape strategy is to enhance the existing character and condition and improve the interface between the urban edges and open fields whilst respecting the sensitivities and qualities of the existing landscape, the individual value of the Emm Brook and the setting of Wokingham and Winnersh preserving the sense of separation between the settlements.
33. The Council's Tree and Landscape Officer has considered the application and the submitted Landscape and Visual Impact Assessment (LVIA) and objected on the following grounds:

'The sensitivity of the site is considered Low due to the presence of the motorway. The LVIA highlights the recently approved SEN school to the south of the site, and a current application for the development of 87 residential dwellings to the SE of the site, which illustrates a Low sensitivity to housing development. At the time of writing there is no decision on the 87 dwellings.'

[...]

Although the site is well-contained there are some fleeting views from the raised section of the motorways from the south-east of the site. There will be views into the site from dwellings adjacent to the west and north of the site despite vegetation being retained. New vegetation will take some time to establish, and besides an appropriate development should integrate seamlessly with its surroundings and enhance the setting.

The LVIA accepts development on the site would impact the size of the gap at the settlement edge but asserts that as the site is contained it would not result in any perceptible loss of the separation. However, in my opinion it will physically change the condition of the site and remove open space from the buffer which I agree will resulting in a substantial 'magnitude of change'. The LVIA assesses the landscape effects at year 1 and 15 as Moderate/Adverse and slight/adverse respectively. At year 15 it is thought development proposals will have little detrimental impact on the adjoining landscape. I assess that the change will be irreversible and could lead to further tandem development across the remaining open land between the settlement and the motorways, removing the rural buffer and reducing the countryside in favour of dense urban style residential development which is also at odds with the character of the existing residential development. Although the landscape strategy for the scheme meets with many of the J2 landscape guidelines, much of the provision of open space is part of the drainage scheme with large attenuation basins that take up a substantial area of the provision.'

34. Whilst the application site is within the countryside, it is broadly surrounded and well-contained by the residential development associated with the settlement of Winnersh and the man-made interventions of the motorways and slip roads, which themselves prevent extended views across the landscape. The noise and visual impact of the

motorway heavily impacts the quality of the landscape. As a result of these factors, the landscape harm would be localised and somewhat limited. The submitted LVIA states there would be a slight adverse impact once the development beds in and landscaping establishes.

35. The area around the Emm Brook would be open space and valuable landscape attributes of the locality could be retained, enhance and brought under a management structure. This includes additional planting for hedgerows, wildflowers, wetland thicket/woodland and removal of non-native species – this is further set out in the *Biodiversity and Ecology* section of this report.
36. The M4 provides a considerable physical barrier between Winnersh and Wokingham. Whilst the site would reduce the amount of open land to the southeast of the settlement, the site is physically well contained and has limited contribution to maintaining the visual separation between the two settlements. There is also development immediately to the south of the site in form of Wheatfield Primary School, SEN School and the Royal British Legion social club. The proposal Ensures the area around the Emm Brook is open space and not developed. It is not considered that the proposal will lead to the physical or perceived coalescence of the settlements.
37. Overall, it is clearly identified by the applicant's LVIA and the council's Landscape Officer that there would be landscape harm. Whilst the level and magnitude of harm is disputed by the relevant experts, it is an impact that weighs negatively in the planning balance.

Impact on existing settlement and Maidensfield

38. Maidensfield is a typical late 20th century suburban cul-de-sac in its design. It has an open plan layout and whilst the properties have front gardens, the houses are relatively close to the road. There are no road markings which adds to the informal suburban layout of the Close.
39. Para 128 of the NPPF states *'to provide maximum clarity about design expectations at an early stage, all local planning authorities should prepare design guides or design codes'*. The council's Living Streets guidance refers to a maximum number of 100 dwellings for cul-de-sac developments. Maidensfield currently serves 48 properties and therefore serving 282 dwellings in total via one entrance is significantly over the council's guidance.
40. Manual for Streets refers to *'connecting layouts to their surroundings'* and states:

'Internal permeability is important but the area also needs to be properly connected with adjacent street networks. A development with poor links to the surrounding area creates an enclave which encourages movement to and from it by car rather than by other modes.'

[...]

'The number of external connections that a development provides depends on the nature of its surroundings. Residential areas adjacent to each other should be well connected.'

41. The National Design Guide states:

'A well-designed and connected network gives people the maximum choice in how to make their journeys. This includes by rail, other public transport, walking, cycling and by car. Priority is given to pedestrian and cycle movements, subject to location and the potential to create connections.'

42. There would be one access with no additional pedestrian or emergency linkages to the surrounding locality. A development of 234 additional houses on a single access would result in an insular and poorly permeable development, in conflict with the National and Local guidance set out above. As stated in the National Design Guide, a connected development is important because it provides movements choices and promotes the use of sustainable modes of transport.
43. The use of Maidensfield as the sole access results in a negative shift in the street user hierarchy towards vehicle through movements and away from pedestrian use. Manual for Street refers to the street user hierarchy where pedestrians should be considered first. Whilst it also states that the guidance does not necessarily need to be applied rigidly, it is clear there would be a negative and significant shift in the character and usability of the road towards vehicle through movements and away from the pedestrian and casual usage of the cul-de-sac by local residents.
44. Currently the road is a residential cul-de-sac with limited and slow vehicle movements, and this allows residents to generally use and share the road and carriageway casually without the anxiety of traffic through movements – this is typical of residential cul-de-sacs where the limited and slow vehicle movements means pedestrians and vehicles share the street and carriageway more equally. The proposal would significantly change this dynamic in favour of vehicle through movements and have a detrimental impact on existing residents' sense of place, and interaction with the road. This impact would be particularly acute at the eastern end of the road.
45. Physical changes to Maidensfield would include formal road markings on the junctions with Fieldway, Donnington Place, Birchmead and Eastbury Park. Tactile paving and dropped crossing points would also be installed at these junctions. The applicant has confirmed that there is no requirement to remove existing informal on-street parking opportunities, and this would continue as existing. The formalisation of road marking and tactile paving also negatively impact the informal character of this residential cul-de-sac and provide additional street clutter.
46. There would also be negative consequences in terms of legibility and the hierarchy roads by retrospectively using a residential cul-de-sac, with access to mews', as the primary access to a major housing development. The councils Living Streets guidance states *'a clear distinction between street hierarchy allows for a more intuitive navigation by all road users and helps to identify principle entry and exit routes'*. From a user perspective it would be a peculiar experience finding the sole access to a major housing development at the end of a road that does not logically appear a main/sole access route. The proposed housing estate would suddenly open-up at the end of the road and this would result in poor sense of place that does not follow a clear and legibly road hierarchy and pattern of development.

47. Whilst the applicant agreed with a Grampian condition (along the lines that no more than 111 dwellings be constructed until a second access is provided), the Planning Practice Guidance states '*such conditions should not be used where there are no prospects at all*'. It has not been demonstrated to the satisfaction of the LPA that there is a prospect of a second access being provided across third party land. The area of land for the second access point shown on the parameters plan is council owned and whilst this land has been promoted for development in the past, it is understood that this land will no longer be promoted for development and that no agreement for a second access would be struck.
48. The technical highway impact of this is discussed in greater detail in the *Highway Impacts* section of this report.

Quantum of development

49. The existing density of Maidensfield and Winnersh Gate to the west is approximately 19 dph (dwellings per hectare). The density of Grovelands Park to the north is approximately 36 dph. The gross density of the development is 20.6dph when the overall site is considered. When considering the areas that will be built on, the development would have a density of 34.6dph which is consistent with the surrounding locality.
50. As set out above, the quantum of development for a single access is not acceptable and conflicts with the council's Living Streets guidance and would result in a poorly preamble and legible development and a detrimental impact on the character and sense of place of Maidensfield.

Impact on Trees and hedges:

51. Most of the hedges and woodlands are located to the site periphery, and this vegetation is protected by TPO1773/2021, which consists of 2 parcels of small Woodland to the eastern boundary next to the Emm Brook. There are 4 'Areas' of trees confined to the site boundaries and a group of field Oaks to the northern part of the site. There are at least 4 Veteran trees on the site, although some are recognised by the Wokingham District Veteran Tree Association, The Ancient Tree Inventory does not correlate this.
52. The Arboricultural Implications Assessment (AIA) identified opportunities to bring all hedges into management under the proposed development. This is judged to be beneficial in that it aims to remove bramble which is overwhelming the hedgerow currently. The parameter plan also creates opportunities for additional hedge planting, and this is further set out in the Ecology and Biodiversity Section of the report.
53. The parameter plan has been designed to take into account existing trees on the site and this includes an area of open space to the north to retain a group of Oak Trees. The development is also positioned approximately 50 metres from the eastern boundary, where the ancient woodland is located and trees along the banks of the Emm Brook. These areas of trees can be protected and conditions 13, 14 and 15 are recommended accordingly.

54. A Tree Survey and Impact Assessment describes some loss of low-quality trees and scrub to a few areas. This includes a small section to widen the entrance from Maidensfield. At the south-west corner and western boundary of the site, some scrub/young trees will be removed to provide garden space.
55. There is potential incursion of the Buffer Zone for Ancient and Veteran trees from the edge of the drainage basin and a swale, but the council's Tree and Landscape Officer is satisfied this can be adjusted within a final layout at the Reserved Matters stage to avoid incursion. This level of detail would be included in the Arboricultural Method Statement at the Reserved Matters stage.
56. Overall, the Council's Tree and Landscape Officer is satisfied with the impact on trees and hedges and advises there are *'plenty of replacement and new planting is proposed across the site using native species. I have no objection to the loss of a few low quality trees that can be replaced'*. The majority of the trees/hedgerows are around the periphery of the site and these can be retained. The handful trees located further within the site can also be retained, as demonstrated by the parameter plan.
57. The proposed development would have an acceptable impact with regard to trees and hedges, subject to the recommended conditions.

Highway impacts:

Access

58. As described, the development will be accessed by Maidensfield, which is residential cul-de-sac. The existing carriageway is 5.5m wide and has 2 – 1.8m wide footpaths on either side. There are several small roads/mews' off the road called Fieldway, Donnington Place, Birchmead and Eastbury Park. There are no formal road markings and informal on-street parking occurs.
59. The main access would be an extension from Maidensfield with 5.5m wide carriageway and 2 – 1.8m wide pavements on either side.
60. A Parking Survey was undertaken along Maidensfield and concluded, that there is no requirement to remove existing on street parking, even if the whole 234 units was access via the road. On street parking also has traffic calming benefits by requiring vehicles to slow down and give way. Swept path analysis was also submitted showing a fire tender and refuse truck can pass along Maidensfield when cars are parked along the road.
61. Satisfactory visibility splays can be achieved at the junction between Maidensfield and Watmoor Lane and this has been confirmed by the council's Highway Engineer.
62. Whilst the physical dimensions of Maidensfield are capable of accommodating the proposed traffic and vehicle movements, it does not negate the negative impacts identified on the other sections of this report regarding permeability, legibility and place making.

Traffic Modelling

63. The development has been run through the borough's strategic model and local junction modelling has also been carried out.
64. The Highways information submitted identifies Maidensfield operates at only 4% of its capacity at present, with Watmore Lane at some 3%. It further states the junction is forecast to continue to operate with ample spare capacity with minimal queuing and delay, even on the basis of an assessment of 250 (rounded up from 234) dwellings on the site being served via Maidensfield. Even in this 250 dwellings scenario, Maidensfield was forecast to operate at a maximum of 23% of its capacity during the weekday peak hour periods when the site is fully built out. There would be, on average, an increase of a two second delay for vehicles turning out of Maidensfield onto Watmore Lane in the weekday morning peak in comparison to the 'without development' scenario. This increase would not be detrimental in highway safety terms but does represent a material shift in the number of vehicle through movements along the street. During the off-peak periods, the delay will be less.
65. The application has been run through Borough's strategic traffic model and this showed acceptable impacts on the following junctions:
- B3030 Robin Hood Lane / Danywern Drive junction
 - B3030 Robin Hood Lane / Robin Hood Way junction
 - Winnersh Crossroads
 - A329 Reading Road / Woodward Close junction
 - A329 Reading Road / Winnersh Relief Road (WRR2) Roundabout
 - A329 Reading Road / North Wokingham Distributor Road (NWDR) Roundabout; and
 - Hatch Farm Way / Longdon Road / B3030 Kings Street Lane signalised junction

Parking

66. It is considered that vehicle and cycle parking would be considered as part of the reserved matters application. For cycle parking within garages, these need to have an internal dimension of 7m x 3m. If in sheds in the rear gardens, these would need to have direct access. For communal cycle parking facilities, each space would need to be 2m x 0.9m. EV parking spaces will need to be set out and agreed as part of the reserved matter details.

Sustainable Location:

67. The council's highway guidance 'Living Streets' states that developments are expected to fall within the *high to medium* categories of accessibility for a site to be sustainable. It then identifies that for a secondary school, core employment and railway station to have medium accessibility, it should be within 2km of the site and for high accessibility 1km. Community facilities, local shops and primary schools should be within 1.2km of the site to have medium levels of accessibility and 800m to be considered highly accessibly.
68. 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.'* A 10-minute walk is approximately 800m. Overall, both pieces of

guidance aim for facilities and services to be with an approximate 1.2km – 800m walk to achieve medium to high levels of accessibility.

69. The application site is adjacent to the settlement limits of Winnersh, which is a Major Development Location. There are a range of facilities within a 1.2km safe and convenient walking distance that include Wheatfield Primary School, Winnersh Primary School, The Forest School, SEN School (under construction), Winnersh Train Station, supermarket, Winnersh Library, social club and a cluster of shops and businesses at the cross-roads between Reading Road, Robin Hood Lane and King Street Lane. Whilst most of these facilities would be over 800m from the centre of the residential development, they would be within the medium accessibility threshold set out in Living Streets. Furthermore, the train station, Wheatfield Primary School, SEN School and the Royal British Legion social club are highly accessibly when assessed against Living Streets.
70. Footpaths in the locality would help to encourage pedestrian movements, and are typically well lit, with active frontages and unobstructed on both sides of the road. The roads surrounding the site are also quiet residential streets away from main arterial routes.
71. The closest bus stops are located on Robin Hood Lane and Reading Road, approximately 1km from the centre of the site. This is outside the recommended walking distances distance to a bus stop, which is around 300 - 400m. These bus stops are served by bus routes 128, 129, 4 Lion and X 4 Services. These bus routes provide an hourly service in both directions during the day. On Saturdays, there is a 2 hourly service and there is also a Sunday service.
72. It is proposed that the existing bus stop on Reading Road would be improved subject to available highway land and impact on neighbouring property. It has been confirmed that a pair of bus stops close to Woodward Close would be improved. The cost of upgrading bus stops would be up to £25,000 indexed linked. This could have been secured by a section S106 agreement should the development been acceptable.
73. Winnersh Train Station is approximately 1 km from the centre of the site, approximately an 11min walk from the end of Maidenfield. The station provides access to the Reading, Wokingham, Ascot, Clapham and Waterloo, as well other stops, with convenient multiple hourly services.
74. There are cycle paths and shared pedestrian cycles surfaces in the vicinity of the site along Reading Road, Longdon Road and Toutly Road. These link into a wider network of cycle lanes and paths towards Wokingham and Reading.
75. A contribution towards the council's sustainable travel campaign MyJourney is secured via a S106 agreement.
76. The council's Highway Engineer has not objected to the development on sustainable location grounds. Taking the quality, usability and accessibility of the sustainable transport options into consideration, the site is sustainable and future residents will benefit from desirable options other than private motor vehicles for day-to-day services and commutes.

Neighbouring Amenity:

77. Whilst the layout is a reserved matter, indicative drawings have been submitted demonstrating that the quantum of development can be accommodated without detrimentally impacting the amenity of existing residents.
78. The impact on the character of Maidensfield and the user experience is previously set out in this report.
79. The Borough Design Guide SPD recommends that 2 storey dwellings should have a minimum rear garden depth of 11 metres and a minimum back-to-back distance of 22 metres. Rear to side relationships should have a gap of at least 12 metres. Indicative layout plans have been provided demonstrating minimum separation distances could be achieved for the quantum of development proposed. A detailed layout will be submitted at the reserve matters stage.

Affordable housing:

80. 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, a minimum of 40% of the total number of units (net) should be provided as affordable housing. This equates to 94 dwellings of the proposed 234 units proposed.
81. The Council's preference is for onsite affordable housing in the first instance, with a 70:25:5 Social Rent: First Homes: Shared Ownership housing tenure split. Therefore, as a starting point, 66 x Social Rent, 23 x First Homes and 5 x Shared Ownership dwellings would be expected to be delivered.
82. The Affordable Housing officer has advised that the mix of affordable units meeting the guide in Policy TB05, TB07 and the Affordable Housing SPD should be as follows:
 - 20% 1 bedroom flats = 19
 - 15% 2 bedroom flats = 14
 - 30% 2 bedroom houses = 28
 - 20% 3 bed houses = 19
 - 15% 4 bed houses = 14
83. The Affordable Housing Team have also requested that 10 of the properties are constructed in a cluster flat model for supported housing in the form of 10 x 1 bed flats surrounding a communal living area and space for care and support provided on site. The units would be let on a social or affordable rent.
84. In the absence of a completed Legal Agreement, the scheme fails to make adequate provision for affordable housing, contrary to policy CP5 of the Core Strategy and section 6 of the NPPF.

Ecology and biodiversity:

85. Policy CP7 of the Core Strategy states that development proposals that may harm habitats or species of principle importance or features of the landscape that are of major importance for wild flora and fauna (including wildlife and river corridors), will

only be 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 sites 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.*

86. Policy TB23 of the MDD Local Plan further states that development proposals should demonstrate how they:

- a) Provide opportunities, including through design, layout and landscaping to incorporate new biodiversity features or enhance existing.*
- b) Provide appropriate buffer zones between development proposals and designated sites as well as habitats and species of principle importance for nature conservation.*
- c) Ensure that all existing and new developments are ecologically permeable through the protection of existing and the provision of new continuous wildlife corridors, which shall be integrated and linked to the wider green infrastructure network.*

87. The application site comprises a large plot of land split into a semi-improved grassland field and arable field, bordered by the Emm Brook, woodland, scrub and hedgerows.

88. The Emm Brook corridor to the east of the site can be retained and enhanced. A section of the existing bank will be re-profiled and re-planted, allowing for an improvement in channel margin vegetation extent and richness. The top zone on the western bank will be removed from active agricultural management and new habitat creation measures will improve the vegetation structure. This will include wetland thicket/woodland, large wood log piles and a Himalayan balsam control strategy will be implemented. This is recognised as a benefit in the overall planning balance.

89. The hedgerows to the south and east, are likely to be considered as 'important' under the Hedgerow Regulations (1997). These hedgerows will however be retained and an additional 0.84km of native species-rich hedgerow can be planted.

90. Other general habitat creation on the site will include the creation of significant areas of species-rich wildflower grassland; other neutral grassland; the creation of two large drainage basins; thicket planting within open spaces; planting of approximately 215 trees across open space areas and within development parcels and the enhancement of a section of existing modified grassland which will form a temporary reptile receptor area.

91. The details of the enhancements will be included within a Landscape and Ecological Management Plan (LEMP), which is appropriate as this is an outline application (see condition 15).

92. The development can result in a net gain of biodiversity enhancements. This includes 10.06% net gain in Habitat units, 83.98% net gain in Hedgerow units 11.05% net gain in River units. Whilst BNG requirements don't come into force until November 2023 for large sites, the application has demonstrated there can be a minimum Biodiversity Net Gain of at least 10% across the site and this is supported.
93. With regard to the impact on bats, none of the proposed tree works will affect their roosting potential, or foraging / commuting.
94. A reptile survey has been undertaken, confirming the presence of a "low" population of slow worm on the site. This means that, unmitigated, works could result in the killing or injury of slow worms and potentially the loss of the slow worm population that exists at the site. The proposals will retain and enhance the Emm corridor, which will be suitable as a receptor site, and as such the council can be confident that appropriate mitigation for slow worms can be provided within the context of the scheme. As such, subject to condition 19 requiring a reptile mitigation strategy to be submitted, approved and then implemented, there are no objections to the application in relation to reptiles.
95. No badger setts have been found on the site although it is likely that badgers commute across and forage within the site. Measures should be put in place to ensure no badgers are harmed during works. These mitigation measures can be included in the CEMP (Construction Ecological Management Plan) which would be secured via recommended condition 9.
96. The site is located less than 50m north of a great crested newt (GCN) consultation zone. However, the GCN record is associated with a pond on the opposite side of the M4 (which will act as a barrier to GCN). Two other ponds were identified within 500m of the site boundary (Section 4.58), with Habitat Suitability Indices of 'poor' and 'below average'. Further to that, eDNA tests of these two ponds returned negative results, confirming that GCN. It is therefore unlikely that GCN inhabit the application site and it is considered that GCN are unlikely to be harmed as a result of the development. As such this species should not be a constraint to the proposals.
97. No objection is raised on the impact ecology as a result of the development and a net gain can be achieved on site. The proposal could have a beneficial impact on biodiversity subject to conditions, which would could have been recommended if the application was acceptable. The site could therefore perform a positive ecological role.

Thames Basin Heaths Special Protection Area:

98. The site is outside of a 7km radius of the Thames Basin Heaths Special Protection Area. Avoidance measures are therefore not required for this development.

Drainage and Flooding:

99. MDD Local Plan Policy CC10 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 and this must be demonstrated through a Surface Water Drainage Strategy. The proposal should reproduce greenfield runoff characteristics and return run-off rates and volumes back to the original greenfield levels.

100. The site is in Flood Zones 1, 2 and 3a. The residential section is entirely within Flood Zone 1 and the areas within Flood Zone 2 & 3 are left as open space. There are some intermittent areas across the site with a low-risk surface water flooding.
101. A Flood Risk Assessment and Surface Water Drainage Strategy has been submitted. This identifies that the profile of the site slopes gently from west to east, with only a small area of land elevated higher than the site to the west. All residential units and SuDS features will be sited in areas designated as Flood Zone 1. Finished floor levels of all properties will be set a minimum of 600mm above a design flood level which accounts for a 70% uplift in peak fluvial flows associated with climate change. Based on this, the fluvial flood risk posed to the residential units and proposed SuDS is assessed to be negligible. Given that no changes in ground level are proposed in areas that are below the design flood elevation, there is no potential for the development to alter how flood water is stored or conveyed within the floodplain past the site.
102. The Surface Water Drainage Strategy shows storm runoff from impermeable surfaces within the site will be collected and conveyed eastward by a system of swales within the development. Within the proposed public open space to the east of the site will be a SuDS system consist of two pond areas linked by a swale. This system will outfall to Emm Brook via a single naturalised channel.
103. The Council's Drainage Engineer has reviewed the application and raises no objection subject to conditions, which would have been recommended if the application was otherwise acceptable.
104. The Environment Agency has not responded to the application. A similar application was submitted and withdrawn in 2017/2018 and the EA responded raising no objection. As the housing development is entirely within Flood Zone 1, there are no conflicts with National Policy as housing is a compatible development within Flood Zone 1. The absence of comments is therefore not considered determinative.

Environmental Health:

105. Policy CP1 of the Core Strategy states planning proposals should '*avoid areas where pollution (including noise) may impact upon the amenity of future occupiers*'. The MDD Local Plan states a key objective for the plan is to '*limit development in those areas at most risk of flooding and pollution*'.

Noise

106. The site is exposed to noise from the M4 and A329 (M). The submitted Noise Impact Assessment indicates that noise from the motorway(s) generally increases from west to east.
107. For external areas used as amenity space (rear gardens and patios), British Standard:8233 states that it is desirable that the external sound level does not exceed 50 dB LAeq,T, with an upper guideline value of 55 dB LAeq,T which would be acceptable in noisier environments. The majority of the residential areas of the site fall within a range between 50db and 55db and comply with the British Standard, albeit at the upper range.

108. The noise levels set out above are however without any consideration of noise attenuation that would naturally occur by the location of dwellings, fences and landscaping. Indicative modelling information has been submitted showing that when this is factored in, outdoor noise levels experienced would be reduced to 35db – 50db across the residential areas of the site. There would be some small areas between 50 – 55db but this is still within the upper range of the British Standard. Whilst not relevant to the acceptability for the scheme, the site will also perform a positive role in attenuating noise from the motorway towards existing residential dwellings on the edge of Eastbury Park, Winnersh Gate and Maidensfield.
109. With regard to internal noise levels, the MDD Local Plan states that Internal ambient noise levels from a steady external noise sources for dwellings should not exceed 35 dB LAeq during the daytime (07:00-23:00) and 30 dB LAeq during the night-time (23:00-07:00) in habitable rooms
110. The NIA states that the accepted rule of thumb is that a window left open for ventilation typically provides a reduction in external noise levels of 10 – 15 dB. Therefore in order to achieve guideline indoor noise levels with open windows, outdoor daytime ambient noise levels should not exceed around 50 dB LAeq and around 45 dB LAeq to achieve. Overall, the NIA states that internal sound levels can be achieved by a glazing and ventilation strategy. Whilst this does not represent a good level of amenity or standard of accommodation, the council's Environmental Health Team are satisfied with this.

Contaminated Land

111. The Geo-environmental Site Assessment states that the site was free of significant contamination with respect to the proposed development. The council's Environmental Health Officer has reviewed the assessment and satisfied that the conclusions are sound.

Air Quality

112. An Air Quality Assessment has been submitted with the application. This concludes that the relevant pollutant monitoring completed close to the site, coupled with additional supporting data from the Defra background mapping tool suggests that pollutant levels in the vicinity of the site are generally below the relevant annual mean objectives in 4 The Air Quality Strategy for England, Scotland, Wales and Northern Ireland (2007 – Defra).
113. The Council's Environmental Health Team have reviewed the submitted information and raise no objection to Air Quality.
114. The Air Quality Assessment states that predicted Nitrogen Dioxide (NO₂) annual mean concentrations modelled at future receptors which will be introduced as part of the development are well below the AQS objective (maximum being 17.0 µg/m³ for the 2026 DS Scenario), therefore it is unlikely that any new sensitive receptors will be introduced into an area of poor air quality. The maximum percentage change in NO₂ concentrations relative to the AQS at any modelled receptor from 2026 DM to 2026 DS was 1.3 %. This is very low and indicates that the development will not lead

to a significant deterioration in air quality with regards to NO₂ as the impact is classed as negligible.

115. The Defra background mapping tool shows that dust and very small Particulate Matter concentrations at the site to be well below the AQS objective limit. This again indicates that air quality in the area surrounding the development site is currently acceptable, and this is further supported by the predicted annual mean Dust and very small Particulate Matter concentrations at modelled future receptor locations.
116. The maximum percentage change for Dust and very small Particulate Matter at any modelled receptor was 0.3 %. This is very low and, in accordance with EPUK (Environmental Protection UK Guidance) and IAQM (Institute of Air Quality) guidance, indicates that the development will not lead to a deterioration in air quality. The impact of the proposed development's operational phase on local air quality is considered not significant, as all pollutants modelled have shown to have negligible impact on local receptors from the change in traffic flows.
117. Effective mitigation measures for dust and pollution during construction could be implemented under site management controls by the development company within a site-specific CEMP condition, if the application was acceptable.

Archaeology:

118. A Cultural Heritage Desk-Based Assessment (DBA) has been submitted in support of the application and includes the results of a geophysical survey undertaken across the site. The geophysical survey did not identify any archaeological anomalies and the DBA concludes that on the basis of the available evidence the site has a low potential for archaeological remains and that any further archaeological work to clarify the presence or absence of archaeological remains could follow planning permission and be secured by a condition.

Sustainable design and construction:

119. Policy CC05 of the MDD Local Plan states that development for 10 dwellings or above must deliver a minimum 10% reduction in carbon emissions through renewable energy or low carbon technology. The application is at outline stage and it is considered that this information can reasonably be secured via a reserved matters application which reflects the most up-to-date standards in force at the time of submission.

Employment Skills Plan:

120. Policy TB12 of MDD Local Plan requires planning applications for all major development (both commercial and residential) in Wokingham Borough to submit an employment skills plan (ESP) with a supporting method statement.
121. ESPs are worked out using the Construction Industry Training Board (CITB) benchmarks which are based on the value of construction. The value of the construction has been calculated as £21,089,375. This is calculated by multiplying the estimated interior floor space of 20,575m² by £1,025, which is the cost of construction per square metre as set out by Building Cost Information Service of RICS.

122. This means that based on the CITB benchmarks the employment skills plan for 222678 Land off Maidensfield, Winnersh is seeking:

Project value	£21,089,375
Community Skills Support E.g. work experience or CSCS training courses	13
Apprenticeship starts	8
Jobs created	8

123. If for any reason the applicants/owners bound by the planning obligation is unable to deliver the plan, they can provide the ES Contribution in lieu. This is based on the cost to WBC supporting the employment outcomes of the plan. The cost to WBC oversee and support each employment target is £3,750. So a total of £60,000 (£3,750 x 16) would be required in lieu of an ESP on this application. Payment of this sum is required before commencement on site.
124. In the absence of a completed legal agreement, the proposal fails to secure opportunities for training, apprenticeships and other vocational initiatives to develop local employability skills contrary to Core Strategy Policies CP1 and CP4 and MDD policy Local Plan TB12.

Utilities and services:

125. Thames Water has confirmed that there is insufficient existing water and wastewater infrastructure to accommodate the needs of this application. Whilst not unusual, in accordance with WIA 1991 they have recommended that a Grampian condition would therefore be required to resolves these issues and condition 18 is recommended accordingly. Public mains water supply to provide suitable water to fight a fire would fall within the remit of Building Regulations.

Community Infrastructure Levy:

126. The Council formally adopted a charging schedule in accordance with the Community Infrastructure Level on 06.04.2015. The development is liable to pay the Community Infrastructure Levy.
127. The Council's Regulation 123 List outlined CIL contributions towards Health centres/GP surgeries and education. The current Infrastructure Funding Statement show allocations towards health provisions and education. CIL can be used to increase the capacity of existing infrastructure in accordance with the Primary Care Trusts comments and third-party comments regarding the capacity of local services, including education.

Planning Balance:

128. The Council cannot demonstrate a 5-year housing supply and therefore the development must be assessed 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.

129. 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). The conflict with the spatial strategy of the plan still weighs against the application. The allocation of the site in the LPU affords limited weight due to the stage of its development.

Economic

130. As with all housing development, the proposal would result in economic benefits. This is broadly set to arise from the economics of construction of 234 homes and household expenditure by future residents. CIL payments and New Homes Bonus would also be an economic benefit of the proposal. Although none of these are unique to this scheme, the size of the development means these benefits are not insignificant and the development is therefore considered perform a positive economic role and carry moderate weight accordingly.

Social

131. The provision of 234 new dwellings, including 94 affordable houses would assist in furthering the social objective of sustainable development. Given the size of the scheme and number of affordable units, there is a material contribution to the boroughs housing land supply, and affordable housing stock. These benefits attract substantial weight. The proposal would also result in open space provision and can create public access to the Emm Brook which would also be a positive outcome. The development is therefore considered perform a positive social role in line with the requirements of the framework.

Environmental

132. There would be harm to the character and appearance of the countryside as the proposal would result in the unplanned loss of open fields. This impact may however be at the lower end of the scale, as the site is surrounded by urbanising features as housing, motorways, schools and roads.
133. There would be an appreciable and negative change in the character, usability and sense of place of Maidensfield. The single access would also result in a poorly connected and permeable development that does not stitch well into the existing hierarchy and network of streets. These impacts go to the heart of place making and providing sustainable and well-designed developments.
134. There would be a temporary environment impact from the construction phase of the development associated with quarrying, processing and transportation of materials along with the general construction on site and emissions from travelling to and from the site.
135. The proposal would result in ecological improvement measures and on-site biodiversity net gain which weighs in favour of the proposal. The proposal could

reasonably be expected to demonstrate a degree of inherent sustainability through compliance with Council supported energy efficiency and Building Regulations standards.

Conclusion:

136. The most important policies for determining the application are out of date by virtue of the absence of a 5-year housing land supply. Paragraph 11 of the Framework therefore states that permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole, or there are specific policies in the Framework which indicate that development should be restricted. In this regard the tilted balance is engaged, all-be-it tempered due to past over-delivery.
137. The proposal would provide a number of benefits that in favour of the application. The provision of new housing and 94 affordable homes within a sustainable location is a weighty benefit in favour of the scheme. Whilst past over-delivery is relevant, it is also pertinent that the current housing land supply shortfall will likely remain until the new LPU is adopted, enabling new planned developments to come forward.
138. As noted there several material factors that weigh negatively in the planning balance including the landscaping impact and single access design of the proposal. Overall, the single access of this major housing development through an existing residential cul-de-sac is a considerable negative design flaw of the scheme and conflicts with established urban design principles. The NPPF sets out in para 126 that '*good design is a key aspect of sustainable development*', and it cannot be considered that proposal meets this key aspect of achieving sustainable development.
139. In considering all matters raised, the adverse impacts significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole. The application is therefore recommended for refusal for the following reasons:

Principle of development

1. The proposal represents inappropriate unplanned development on a greenfield site within the countryside that is outside of development limits and contrary to the spatial objectives of the development plan and to policies CP1, CP3, CP6, CP9, CP11 and CP17 of the Core Strategy, CC01, CC02 and TB21 of the MDD Local Plan, the Borough Design Guide SPD and sections 2, 4, 12 and 15 of the NPPF.

Impact on the landscape and countryside

2. The proposed development will have a negative and detrimental impact on the landscape and character & appearance of the area by reason of an unplanned loss of an open greenfield in countryside for a large-scale urbanising development. contrary to policies CP1, CP3 and CP11 of the Core Strategy, CC01, CC02, CC03 and TB21 of the MDD Local Plan, Shinfield Neighbourhood Plan Policy 1 and 2, the Borough Design Guide SPD, the Wokingham District Landscape Character Assessment and sections 12 and 15 of the NPPF.

Access and design

3. The single access arrangement would, result in a poorly permeable and insular development that fails to integrate satisfactorily into the surrounding network of roads and footpaths; detrimentally impact the character, usability and sense of place of the existing cul-de-sac Maidensfield; and, result in a poorly legible hierarchy of streets to the local area by reason of the sole access to a major housing development being located of a limb of an existing cul-de-sac. The development conflicts with policy CP1, CP3, CP6 and CP11 of the Core Strategy, CC01 and CC02 of the MDD Local Plan, the Borough Design Guide SPD, National Design Guide and section 15 of the NPPF.

Employment Skills Plan

4. In the absence of a completed legal agreement, the proposal fails to secure opportunities for training, apprenticeships and other vocational initiatives to develop local employability skills contrary to Core Strategy Policies CP1 and CP4 and MDD policy Local Plan TB12.

Affordable housing

5. In the absence of a completed Legal Agreement, the scheme fails to make adequate provision for affordable housing, contrary to policy CP5 of the Core Strategy and section 6 of the NPPF.

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 the protected groups 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 upon protected groups as a result of the development.

RECOMMENDATION

Conditions agreed:	N/A
Recommendation:	Refuse
Date:	11.08.2023
Earliest date for decision:	02.03.2023

Recommendation agreed by: (Authorised Officer)	
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Date:	11.08.23
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