

FAO Case Officer
Wokingham Borough Council
Shute End
Wokingham, Berkshire
RG40 1BN

Planning Reference: 250517
Date: 23rd April 2025

Dear Sir/Madam,

Objection from Shinfield Parish Council.

Application Reference 250517: Land off Basingstoke Road & to the south and west of Spencers Wood.

Outline Planning Application for 420 dwellings and a range of other uses.

Shinfield Parish Council **strongly objects** to application reference 250517, submitted at land off Basingstoke Road, to the south and west of Spencers Wood.

The application seeks outline planning permission for the development of up to 420 dwellings (Use Class C3), an 80-bed care home (Use Class C2), 1 ha of employment land (Use Class E(g)), a primary school (Use Class F1), a local centre (Use Classes E(a), (b), (c), (f)), a GP surgery (Use Class E(e)), sports pitches and changing facilities, public open space, SANG provision, and associated infrastructure.

This application is speculative, with insufficient justification and significant shortcomings in its planning rationale. Before discussing fundamental issues with the planning case itself, we firstly wish to highlight procedural shortcomings with the submission, namely:

- There were only 31 responses received during the applicant's consultation. 6000 surveys were sent out.

The planning application was submitted just 7¹ working days after receiving the formal pre-application response giving the applicant very little opportunity to amend the scheme following the nuances of a formal written response.

- Key documents are missing from the submission, including a Minerals Resource Assessment (acknowledged in Paragraph 5.15.2 of the Planning Statements), Draft Onsite Emergency Plan and a Care Needs Assessment. Additionally, the Heritage Assessment appears to be based on incorrect plans (this is discussed latter in the document).
- The Planning Statement fails to demonstrate any meaningful changes to the proposal based on community or council input. There is also limited consideration given to the Shinfield Neighbourhood Plan.
- The Landscape and Visual Impact Assessment (LVIA) does not consider the Shinfield Neighbourhood Plan (Paragraph 5.4.21 of the Environmental Statement) albeit the key views are outlined within Appendix E rather than specific policies.
- There is no detailed outcome from the pre-application process, nor is there clarity on how feedback from Shinfield Parish Council influenced the plans.
- Submitting the planning application prior to a meeting with the Joint Emergency Plan Unit (as confirmed in Paragraph 4.4.2 of the Planning Statement) seems unwise given the location of the site within the DEPZ and the council's policies on development in this location.

Moving onto the substance of the applicants planning case, we object to the proposed development for the following reasons (with accompanying policy references), which will be explored in detail in this letter:

- The scale of development on land outside the settlement boundary (Policy CC02, TB21, Policy 1 & Policy 2).

¹ The Pre-app response was received on the 21st February 2025 according to Paragraph 4.1.1 of the Planning Statement and the planning application was received on the 4th March 2025 according to the planning portal.

- The scale of development on land inside the DEPZ (Policy TB04).

The introduction of shops and a doctor's surgery will bring people into the DEPZ (Policy TB04).

- The mass, layout, and height of the proposals (Policies CP3, CP9, CP11, CC03 and Policy 2 of the Neighbourhood Plan).
- Excessive urbanisation of the small village (Policy TB26 as well as Policy 1 and Policy 2 of the Neighbourhood Plan).
- Inadequate access arrangements onto Basingstoke Road (Policy CP6).
- Lack of public transport provision (Policy CP6).
- Lack of footpaths and effective cycle routes (Policy CP4).
- Loss of agricultural land and harm to the rural environment (Policy CP1).
- Detrimental impact on heritage assets (Policy CP3).
- Conflicts with the Joint Minerals and Waste Plans.
- Potential competition with the town centre (Policy TB16).
- Insufficient justification for the need for care provision (Policy TB09).
- The development programme isn't clear in the parameter plan.

Planning Policy Context

Paragraph 15 of the National Planning Policy Framework (NPPF) requires the planning system to be plan-led, whereby plans should provide a positive vision for the

future of each area, a framework for addressing housing needs and other priorities.

In this instance, the development plan (defined in Section 38 of the Planning and Compulsory Purchase Act 2004) comprises the adopted Wokingham Borough Core Strategy (2010), the Managing Development Delivery Local Plan (2014), the Shinfield Parish Neighbourhood Plan (2017), Central and Eastern Berkshire Joint Minerals & Waste Plan (2023) and the partially revoked South East Plan (Policy NRM6 Only).

Paragraph 232 of the NPPF confirms that existing policies should not be considered out-of-date simply because they were adopted or made prior to the publication of this Framework. Footnote 2 of the NPPF also confirms that made Neighbourhood Plans are part of the Development Plan.

Due weight should be given to them, according to their degree of consistency with this Framework (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given).

Core Strategy (2010)

The relevant policies are:

- Policy CP1 (Sustainable development) states that planning permission will be granted for development proposals that avoid areas of best and most versatile agricultural land.
- Policy CP2 (Inclusive communities) focuses on addressing the needs of communities, including older people. It ensures that new developments contribute to the creation of sustainable and inclusive communities, with particular emphasis on meeting long-term needs. Planning permission will be granted for proposals that specifically address the needs of an ageing population, particularly in the areas of housing, health, and wellbeing.
- Policy CP3 (General Principles for development) says that planning permission will be granted for proposals that are of an appropriate scale of activity, mass, layout,

built form, height, materials and character to the area together with a high quality of design without detriment to the amenities of adjoining land users including open spaces or occupiers and their quality of life; the policy says the DAS should respond to the key criteria.

- Policy CP4 (Infrastructure Requirements) says planning permission will not be granted unless appropriate arrangements for the improvement or provision of infrastructure, services, community and other facilities required for the development taking account of the cumulative impact of schemes are agreed.
- Policy CP6 (Managing Travel Demand) sets out seven criteria for successful schemes;
- Policy CP9 (Scale and Location of Development Proposals) classifies Spencers Wood as a modest development location. The policy says that the scale of development proposals in Wokingham borough must reflect the existing or proposed levels of facilities and services at or in the location, together with their accessibility.
- Policy CP11 (Proposals outside development limits including countryside) constrains development in the countryside and sets out criteria when its acceptable.
- Policy CP13 (Town centres and shopping) says that new retail centres that will not impact upon existing retail centres may be designated through the Local Development Framework.

Managing Development Delivery Local Plan (2014)

The key policies are:

- Policy CC02 (Development Limits) says that planning permission for proposals at the edge of settlements will only be granted where they can demonstrate that the development, including boundary treatments, is within development limits and respects the transition between the built up area and the open countryside by

taking account of the character of the adjacent countryside and landscape.

- Policy CC03 (Green Infrastructure, Trees and Landscaping) says development proposals should demonstrate how they have considered and achieved the key criteria within scheme proposals.
- Policy TB04 (Development in vicinity of Atomic Weapons Establishment (AWE), Burghfield) says development will only be permitted where the applicant demonstrates that the increase in the number of people living, working, shopping and/or visiting the proposal (including at different times of the day) can be safely accommodated having regard to the needs of “Blue light” services and the emergency off-site plan for the Atomic Weapons Establishment site at Burghfield.
- Policy TB09 (Residential accommodation for vulnerable groups) is supportive of accommodation for vulnerable groups that provide for peoples’ needs over a lifetime.
- Policy TB16 (Development for Town Centre Uses) says that proposals for retail uses including extensions of 500 sq m (gross) or above outside the primary shopping areas defined on the Policies Map or for all other main town centre uses outside the defined Wokingham major town centre or the small town/district centres or local centres will be required to satisfy the sequential test.
- Policy TB21 (Landscape Character) 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.
- Policy TB24 (Designated Heritage Assets [Listed Buildings, Historic Parks and Gardens, Scheduled Ancient Monuments and Conservation Areas]) requires works to or affecting heritage assets or their setting to demonstrate that the proposals would at least conserve and, where possible enhance the important character and special architectural or historic interest of the building, Conservation Area, monument or park and garden including its setting and views.

gravel and soft sand resources of economic importance, and around active mineral workings, are safeguarded against unnecessary sterilisation by non-minerals development.

Policy M2 sets out the requirements Minerals Resource Assessment. These are:

- Prior extraction, where practical and environmentally feasible, is maximised, taking into account site constraints and phasing of development; or
- It can be demonstrated that the mineral resources will not be permanently sterilised; or
- It would be inappropriate to extract mineral resources in that location, with regard to other policies in the wider Local Plans.

Emerging Local Plan

Wokingham submitted their emerging local plan to central Government on the 28th February 2025. As very little information is currently known about the view of the Government Inspector regarding the local plan, it's difficult to assign weight to policies within the local plan, however it should be noted that one key change is that the site transects a "Valued Landscape" where development is restricted (Policy NE6).

Additionally, the Statement of Common Ground between Wokingham Borough Council and Reading Borough Council (Dated March 2025) confirms the council's position not to allocate sites with the AWE consultation zone (Paragraph 4.34 – 4.37).

Housing and Economic Land Availability Assessment Report September 2024 (PDF)

The site was considered for housing in the council's Housing and Economic Land Availability Assessment (Site Reference: 5SH013).

The site assessment confirms that the development would not be in line with the borough's current planning framework due to the impact on emergency planning (Excluded at Stage 2A).

Scale of development in the countryside

The site is located within designated countryside, outside the defined settlement limits in both the adopted and emerging local plans. Development in these areas is constrained by Policy CP11 and Policy CC02, which aim to protect the separate identities of settlements and preserve the quality of the environment. As such, proposals for development outside these limits are generally not permitted.

Policy 1 of the Neighbourhood Plan specifies that for the principle of development to be acceptable, the benefits must outweigh the harm. Policy 2 (General Design Principles) further requires that development be compatible with the scale and features of existing buildings in the locality. The latter policy is particularly relevant in this case as the development is incongruent to the existing settlement.

Whilst the Council is unable to demonstrate an adequate housing land supply, the Parish Council contends that, in this instance, the potential impact on heritage assets means that the "tilted balance" should not apply.

Furthermore, we believe the proposal conflicts with Paragraphs 187 and 135 of the National Planning Policy Framework (NPPF). The development would alter the nature of the settlement, affecting people's shopping and living arrangements. Although this is an outline application, it is clear that any development of this scale would not be sympathetic to the rural character of the area.

Spencers Wood's rural character is, in part, defined by the surrounding open countryside. This open countryside enhances the settlement's rural identity and distinguishes it from other nearby areas.

The NPPF acknowledges the intrinsic character and beauty of the countryside, as well as the wider benefits derived from natural capital and ecosystem services. These include the economic and other advantages of the best and most versatile agricultural land, and the value of trees and woodland (Paragraph 187). This proposal is in direct conflict with these principles.

The proposal would also result in an unsustainable pattern of development by creating a large, unplanned housing estate on a greenfield site outside settlement limits. Therefore, the proposals are harmful. The proposals are contrary to policies CC02, TB21 as well as Policy 1 & Policy 2 of the Neighbourhood Plan.

As a result, the adverse impacts of granting planning permission would significantly and demonstrably outweigh the benefits, when assessed against the policies of the NPPF as a whole.

Heritage

Spencers Wood is a modest development location with origins dating back to the 1500s. The map below, produced by Historic England, illustrates the proximity of heritage assets close to the site.

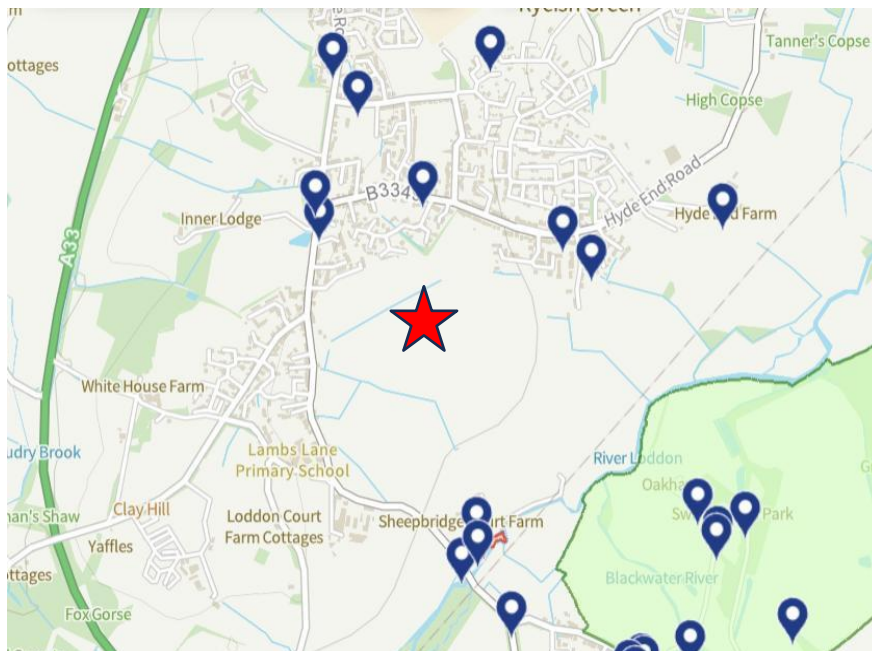


Figure 2: The location of heritage assets surrounding the site. The site is labelled with a star.

The designated assets include: Swallowfield Park, Swallowfield Park and Stable Block, Sheepbridge Court. These designated heritage assets are rural in nature, as is their setting, and the proposed development will have clear impacts on them. In addition to the listed buildings, there are also non-designated heritage assets that will be affected by the proposal.

While it is noted that a heritage report has been submitted alongside the application, we disagree with its conclusions regarding the overall level of harm. Our objection to the Heritage Assessment lies in the weight it assigns to the harm caused by the proposal. We believe this is partly due to the categorisation of the proposed development within the Heritage Statement.

Paragraph 5.3 of the Heritage Assessment, in particular, states that the buildings are limited to a height of 2.5 storeys, with the exception of the school. The parameter plan shows there are significant numbers of buildings that are three storeys in height.

The prevailing building height in the village is currently 2 storeys and as a result this will have an urbanising effect on the settlement as a whole, and as a result the heritage assets within the settlement.

The Planning Statement acknowledges that harm will be caused by the proposal, but this harm is understated in the planning balance. We believe this application will have the following implications:

- Harm to the setting of a significant number of designated and non-designated heritage assets, which are distributed throughout the rural landscape in close proximity to the site.
- Harm to the special character and appearance of the area.
- Harm to the rural setting of properties located near the site.

The applicant has not conducted an Alternative Sites Assessment to demonstrate that there are other sites within the borough that could deliver the required housing without leading to harm to heritage assets.

Therefore, the proposal conflicts with Policy CP3, Policy TB24 and Chapter 16 of the National Planning Policy Framework (NPPF). As heritage harm has been identified, footnote 7 of the NPPF is triggered, meaning that the 'tilted balance' in paragraph 11 is disengaged. Consequently, the applicant's arguments related to a lack of housing land supply and the engagement of the tilted balance should be dismissed.

Agricultural Land Classification

The Agricultural Land Classification (ALC) provides a framework for classifying land according to the extent to which its physical or chemical characteristics impose long-term limitations on agricultural use. The ALC system classifies land into five grades with 1 being the best and 5 being the worst.

The highest grade goes to land that:

- gives a high yield or output
- has the widest range and versatility of use
- produces the most consistent yield
- requires less input

The best and most versatile (BMV) agricultural land is graded 1 to 3a². The proposed development is located on Grade 3 land which is good to moderate quality agricultural land and therefore BMV. Planning Practice Guidance Paragraph: 001 Reference ID: 8-001-20190721 requires that planning policies and decisions should take account of the economic and other benefits of the best and most versatile agricultural land. However a significant amount of best and most versatile agricultural land would be lost due to the proposed development, and this is unacceptable.

The scale of development on land inside the DEPZ

The existing and emerging Local Plan constrain development within the DEPZ.

Policy TB04 states that development will only be permitted where the applicant demonstrates that the increase in the number of people living, working, shopping and/or visiting the proposal (including at different times of the day) can be safely accommodated having regard to the needs of “Blue light” services and the emergency off-site plan for the Atomic Weapons Establishment site at Burghfield.

The application seeks outline planning permission for the development of up to 420

² <https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land>

dwelling (Use Class C3), an 80-bed care home (Use Class C2), 1 ha of employment land (Use Class E(g)), a primary school (Use Class F1), a local centre (Use Classes E(a), (b), (c), (f)), a GP surgery (Use Class E(e)), sports pitches and changing facilities, public open space, SANG provision, and associated infrastructure.

Assuming an average occupancy of 2.4 people per dwelling (as per Office for National Statistics calculations based on the 2021 Census data) would mean that the development would bring 1,008 additional residents into the DEPZ, alongside permanent residents and staff relating to an 80 bed care home³. This would be added to additional visits to the DEPZ related to 1 ha of employment land (Use Class E(g)), a primary school (Use Class F1), a local centre (Use Classes E(a), (b), (c), (f)), a GP surgery (Use Class E(e)), sports pitches and changing facilities, public open space and SANG provision.

Given that this development dramatically increases the number of people within the DEPZ (shopping, visiting etc), there is no emergency plan to deal with these numbers and the West Berkshire Emergency Planning Team pre-app hasn't taken place. As such, the proposal would be contrary to the requirements of Policy TB04 of the MDD Local Plan and section 8 of the NPPF.

This was recently tested in the Hollies Planning Appeal (APP/W0340/W/22/3312261) where the inspector accepted that the OSEP is not 'infinitely scalable and that incremental, unplanned development could, over time, erode the effective management of the land use planning consultation zones and be detrimental to public safety.'

In this instance we believe a major development such as this should be considered during the local plan process rather than a speculative development.

The mass, layout, and height of the proposals

The parameter plans conflict with Policies CP3, CP9, CP11 and Policy CC03. The excessive urbanisation of the smaller settlement would have a significant impact on the

³ The Planning Statement for the Care Home in Evendons Lane (Planning Reference: 321351) estimates that this 64 bedroom care home creates 50 FTE jobs. With an 80 bedroom care home it is assumed that there will be a minimum of 25 members of staff (1:3 ratio).

character of the area.

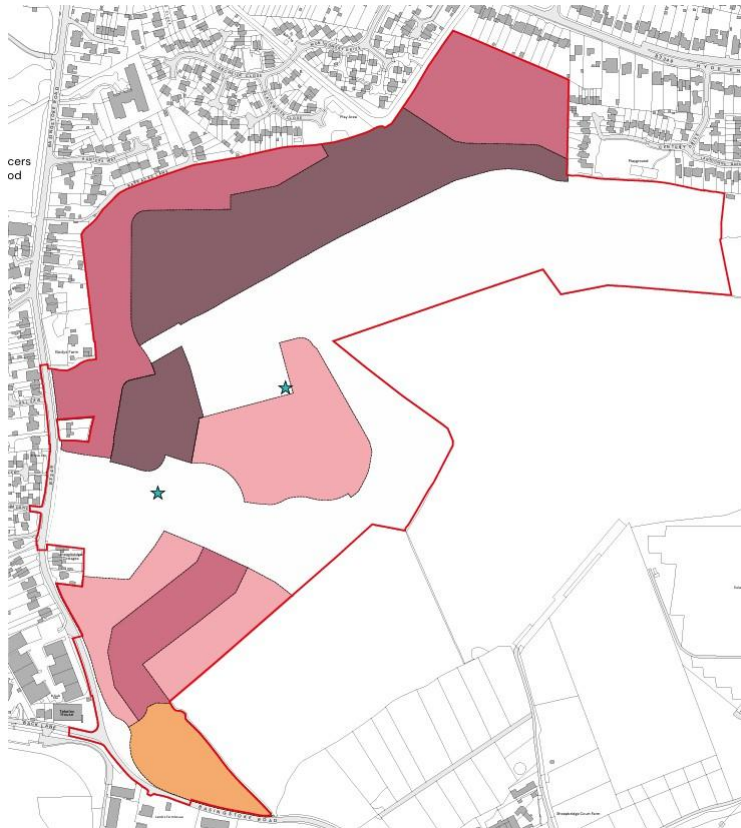


Figure 3: Parameter Plan showing the height of the buildings

Under the proposed plans, new properties could be built directly adjacent to the existing housing in Spencers Wood, with little consideration for separation distances.

The Building Heights Parameters Plan misses the opportunity to locate the northern dwellings away from existing residences. The creation of the SANG to the south of the housing in the proposal, and the desire to maintain key site lines appears to have squeezed development to the north of the site.

In some cases, these new buildings are not only taller but considerably taller than the existing dwellings. This would effectively urbanise the area, rather than preserving the countryside setting, which is contrary to the principles of the development plan policies and Paragraph 135 of the NPPF.

The scale of this development, is by its very nature unacceptable. However, to mitigate the impact of the proposed development on neighbouring properties, the parameter

plans should include an expanded landscape buffer, which would prevent new developments from backing directly onto existing homes. This buffer should be larger than the landscape features outlined in the indicative masterplan.

At a minimum, the parameter plan should also include the various landscape buffers (E.g. Land to the South of Body's Farm) that are shown on the indicative plans. This will ensure that the development can be controlled in line with the original application

Furthermore, the height of any new buildings should be restricted to a **maximum of two storeys**, ensuring compatibility with the scale of existing properties in Spencers Wood. Three storey buildings are completely unacceptable given the prevailing character of Spencers Wood. The overall development density should also be reduced to maintain the rural character of the settlement, minimising any urbanising effect. None of the above has been taken into account by the applicant,

Inadequate access arrangements onto Basingstoke Road

The Parish Council are very concerned with the access arrangements to the development (Confirmed in Paragraph 4.3.1) and are not satisfied with the plans that the council has submitted.

The Parish Council are particularly concerned about safety issues in relation to the roundabouts accessing the site; the key concerns are:

- Back Lane is the primary access to Lambs Lane School and additional traffic routing into/out of this is a safety issue whilst the school remains in use.
- The Basingstoke Road southbound from this position has restricted vision due to the left hand bend, and has a single footpath with restricted width.

Officers should assess whether the development meets the seven criteria within Policy CP6 (Managing Travel Demand). These are:

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

- b) Are located where there are or will be at the time of development choices in the mode of transport available and which minimise the distance people need to travel;
- c) Improve the existing infrastructure network, including road, rail and public transport, enhance facilities for pedestrians and cyclists, including provision for those with reduced mobility, and other users;
- d) Provide appropriate vehicular parking, having regard to car ownership;
- e) Mitigate any adverse effects upon the local and strategic transport network that arise from the development proposed;
- f) Enhance road safety; and
- g) Do not cause highway problems or lead to traffic related environmental problems.

We think the proposal potentially conflicts with criteria a, c and e, f & g.

In line with Paragraph 116 of the NPPF we request that there is an independent assessment of the impact of the scheme on highway safety grounds as well as an assessment of the residual impact of the cumulative impact on the road network as a result of these proposals.

Until this assessment is carried out, we object on the basis of road safety and conflict with Paragraph 116 of the NPPF.

Lack of public transport provision

A key criteria of Policy CP6 is the location of the site and whether its sustainable.

The Parish Council are concerned with the lack of public transport provision in this location. They believe there are a lack of footpaths and effective cycle routes (Policy CP4), particularly to Swallowfield.

Conflicts with the Joint Minerals and Waste Plans

The applicant's planning statement doesn't fully consider and respond to the site's designation, within a Minerals Safeguarding Area. This is surprising given the prominence the council gives to this, on the Constraints Map, and local validation list ([Useful documents to check](#)) as well as paragraph 224 of the NPPF.

The Planning Statement merely states that a plan will be 'submitted during the period of determination of the application (Paragraph 5.15.2).' Whilst the lack of a minerals safeguarding plan, might be a technical issue, the application appears to have not fully considered minerals and waste from the outset. The applicant should withdraw the application.

In the absence of a Minerals Resource Assessment, there is conflict with the Joint Minerals and Waste Plans (2023).

Insufficient justification for the need for care provision.

A key strand of Wokingham's development plan is that homes should meet housing needs. This is implicit within Policies CP2 and TB09, which refer to addressing housing needs across key groups.

This proposal does not include a Care Needs Assessment, which would consider whether there is a need for care provision within 5 km of the site. Such reports are commonplace and have been included in the outline planning application for Evendons Lane.

As this site is located on the edge of the borough, the applicant must also consider the need for care within both Reading Borough Council and Wokingham Borough Council. In this instance a review of the demand in the area controlled by Reading Borough Council seems particularly relevant.

Given that the applicant has not provided details of a care provider, this proposal seems highly speculative and may not actually be delivered.

Delivering a High Quality Development

Policy CP3 sets out the requirements of all new developments. The key areas of concern are:

- The parameter plans create a large developable area which doesn't identify the roads and accompanying landscape features. While it is accepted that these matters maybe consideration for a Reserved Matters Application there are key challenges with the emerging layout including the position of the proposed in relation to the existing properties.

While it is recognised the council's five year housing land supply possible, the scale of development on land outside the settlement boundary is considered disproportionate.

- Excessive urbanisation of the small village – This development will lead to taller buildings which is out of character compared to the existing settlement. The majority of the development 2.5 to 3 storey. The parameter plan doesn't control the height of this.
- The commercial units are out of keeping with countryside village location. The Parish Council dispute the need for Industrial Units in this location.
- The Employment Land Assessment outlines a general view about the need for land for employment purposes. Analysis of current and pending applications should be undertaken to establish whether there is a need for this type of proposal in this location. Our search confirmed a live planning application in Shinfield Park (Planning Reference: 250415) as well as approved scheme in Mulberry Business Park (Planning Reference: 240575) which increased the supply of Employment land by 95 sqm.
- The Parish Council has concerns regarding the network of footpaths, the proximity of the buildings to the existing houses and the connection to Swallowfield. The

Parish Council is concerned with the limited paths and lack of cycling provision.

- The plans for the additional services lack credibility; The proposal for a new school, for example, don't appear to have been agreed with the existing school. The statement for community involvement is also silent on consultation other public service organisations. The applicant relies on these as perceived benefits but unless they are phased to be delivered early in the programme they will not be delivered. The Outline application therefore needs to include a phasing plan which sets out when the key parcels of land will be delivered.

Planning Balance

Given the council advised the applicant that this proposal is not acceptable in May 2023 (Paragraph 3.28) we believe this scheme should be refused without delay.

As heritage harm has been identified, footnote 7 of the NPPF is triggered which means that the 'tilted balance' of paragraph 11 is disengaged (the applicants arguments relating to lack of housing land supply and the titled balance being engaged should therefore be dismissed).

The proposed development is not only speculative but also poses significant risks to the local area, environment, and heritage. The concerns outlined above, including the development's conflict with established planning policies, the adverse impacts on the rural character and strategic gaps, and the overwhelming opposition from residents, underscore the unsuitability of this proposal.

We urge the planning authority to recognise the importance of adhering to the 'plan-led system' as emphasised in the National Planning Policy Framework and to consider the long-term implications of this development on Sherfield-on-Loddon. **As such, we respectfully request that application reference 250517 be refused.**

Yours sincerely,

Shinfield Parish Council