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Dear Andrew

# Land Adjacent to Blagrove Lane, Wokingham: Outline Planning Application Ref. 222306 - Updated Submission

On behalf of Berkeley Strategic Land Limited ("Berkeley"), we are writing to submit updated drawings and accompanying documents in relation to the outline planning application (ref. 222306) for the proposed development at the above site.

This submission proposes revisions to the planning application to address the relevant comments received by Wokingham Borough Council (WBC) (including from the local community and other parties) during the initial statutory consultation on the application. It also follows the helpful discussions held with WBC Officers since the application was submitted.

## **Revisions to Application Proposal**

#### **Description of Development**

The revised scheme has resulted in the proposed Community Space being removed and a Care Home (Class C2) being proposed and therefore the description of development for the application should be updated to reflect this, as follows:

"Outline application, with all matters reserved except for access, for **the proposed erection** of up to 350 dwellings (Use Class C3) **and care home (Use Class C2), with new accesses onto Barkham Road and Blagrove Lane,** community space (Use Class F2), landscaping and onsite SANG, following demolition of outbuildings and agricultural buildings."

### Other Amendments to the Application Form

The revisions to the scheme result in the following amendments to the planning application form (and the text below supersedes that on the submitted planning application forms):



- Change to description of the proposal, as set out above (additions in bold/deletions in strikethrough).
- Vehicle Parking (see updated table below)

Vehicle Type	Existing	Proposed	Difference
Cars	0	901	901
Cycle Spaces	0	667	667

Residential Dwellings/Units (see updated table below)

	Market Housing	Social, Affordable or Intermediate Rent	Affordable Home Ownership
1 bed	11	5	12
2 bed	41	40	25
3 bed	82	30	
4+ bedroom	93	11	
Unknown bedroom	-		
Total	227	86	37

• Non-Residential Floorspace (see updated table below)

Use Class	internal floorspace (sq m)	_	internal floorspace	Net additional gross internal floorspace following development (sq m)
Agricultural Buildings	319	319		
Class C2			4,239	
Total	319	319	4,239	3,920

## **Summary of Scheme Changes**

The planning application is only in outline with detailed approval for access sought at this stage. Notwithstanding this, the application is accompanied by a detailed indicative scheme demonstrating that the application proposal can be accommodated in an appropriate manner on the site. The updated scheme has sought to address the comments raised during the statutory consultation process and this has resulted in the key changes set out below.

- a The removal of the community space and the introduction of land for a 68-bed care home
- b A slightly extended developable area to incorporate the care home whilst ensuring legible residential block structure
- c Amended housing mix and tenure provision
- d Revised access design on Blagrove Lane



- e Revised parking layout and introduction of SANG parking
- f Amendments to the SANG including extending it to the north side of Barkham Road and realignment of SANG footpath
- g Allotments and associated parking relocated along the main access road and relocated orchards
- h Play strategy reviewed and the larger play space (NEAP) now proposed in SANG in the western side of the site and the smaller play space (LEAP) within the eastern part of the site
- i Drainage basins reviewed to ensure no encroachment into root protection areas

Further details can be found in the accompanying Design & Access Statement Addendum. This also includes a Lighting Strategy.

## **Updated Drawings & Reports**

The updates to the planning application comprise:

- 1 The Updated and New Drawings listed in Annex 1; and
- 2 Design & Access Statement (DAS) Addendum, prepared by Boyer including Lighting Strategy;

The following documents accompany the application:

- Planning Statement Addendum including response to Planning Policy Comments and updated Economic Benefits Note (prepared by Lichfields)
- 2 LVIA Addendum (prepared by BMD)
- 3 Updated Flood Risk Assessment and Drainage Strategy Report (prepared by Price & Myers)
- 4 Transport Statement Addendum (to address Officer comments, prepared by Glanville)
- 5 Transport Statement Addendum 2 (to assess the proposed Care Home, prepared by Glanville)
- 6 Agricultural Land Quality Report (prepared by Reading Agricultural Consultants)
- 7 Updated Construction Management Plan (prepared by Lichfields)
- 8 Updated Sustainability Statement (prepared by Hodkinson Consultancy)
- 9 Updated Energy Statement (prepared by Hodkinson Consultancy)
- 10 Response to Ecology Comments (prepared by HDA)
- 11 BIA Technical Note and Updated Matrix (prepared by HDA)
- 12 Bat Survey Report (prepared by HDA)
- 13 Updated Arboricultural Impact Assessment and Tree Condition Survey (prepared by Ruskins)



## **Responding to Consultee Comments**

#### Removal of the Community Facility and introduction of a Care Home

Following discussions with Officers it was made clear that the Borough Council/Town Council do not consider there is a requirement for a community building/facility in this location due to high management costs and the challenge to find end users. Officers highlighted that the Council really need sites for care facilities within the Borough. As set out above the scheme has been amended to address this.

The revised proposals include land which will be provided to the Council for a 68 bed care home including ancillary space. The care home plot will be a 'serviced site' and will be offered to Wokingham Borough Council and its care home provider at nil cost. The Council will have the option to deliver the care home to help meet future adult social care requirements in the Borough, in particular for those Borough residents who require specialist care including dementia care. In the event that planning permission is granted the Section 106 agreement can be drafted so that after an appropriate period of time, if the Council does not wish to bring forward the care home on the site, an alternative approach such as a privately-run Care Home or, subject to a further application, additional class C3 homes to be provided instead.

There is significant demand for older persons accommodation in Wokingham, evidenced by the Berkshire Strategic Housing Market Assessment (SHMA) February 2016<sup>1</sup> which concludes on the projected need for older persons accommodation (including Specialist Housing) in the period 2013-2036 of 1,965 market bedspaces and 219 affordable bed spaces.

However, it is noted that the SHMA data is now several years old. Whilst not a direct comparison, the Market Position Statement for Adult Social Care 2022-2025 published by WBC<sup>2</sup> shows the 2020/21 current usage of residential care and nursing care in the 65+ age category has increased significantly in the short period between 2018/19 and 2020/21 as set out below. This shows that demand for care services is only increasing.

	Males 65+		Females 65+			
	2018/19	2019/20	2020/21	2018/19	2019/20	2020/21
Residential Car	е					
Total	74	74	89	169	192	205
% change			20.3%			21.3%
Nursing Care						
Total	79	87	128	135	154	212
% change			62%			57%

The Market Position Statement shows that in terms of supply, as at March 2022 there were 22 residential homes for the over 65's in Wokingham with a total of 958 bed spaces. Not all of these will

<sup>1</sup> https://www.wokingham.gov.uk/sites/wokingham/files/2023-06/Berks%20SHMA%20Feb%20V2.compressed.pdf

<sup>&</sup>lt;sup>2</sup> https://www.wokingham.gov.uk/sites/wokingham/files/2023-06/ASC%20MPS%202022%20-%2025%20November%202022.pdf



have been built since 2013 but this supports the above analysis that there is still a significant shortfall in bed spaces to meet needs to 2036.

Specifically with regards to dementia beds, page 79 of the Market Position Statement for Adult Social Care 2022-2025 states:

"The Council is able to keep pace with Low level Nursing/Dementia beds but there is a lack of nursing dementia beds in borough, particularly for complex Nursing Dementia beds."

As set out in the aforementioned Market Position Statement, care homes need to be accessible to staff and families, near public transport and areas of population. The site of this application meets these criteria, being on the edge of Wokingham and accessible by a range of public transport measures. The proposed care home site is located as close as possible to the existing built up area alongside the main road within the site and the application proposals include two new bus stops within the site.

#### **Housing Mix and Tenure**

The scheme is proposing to deliver 35% affordable housing (which is consistent with the requirement for the Borough's allocated sites) and is justified in this case by the inclusion of a serviced plot for a care home (which will be offered to Wokingham Borough Council at nil cost as set out above) plus the inclusion of 8 'cluster flats' as part of the 35% affordable housing. This responds to the consultee comments received from 'Strategic Housing' who referenced the delivery of cluster flats for supported/specialist accommodation for vulnerable adults with communal living space and room for care and support on site. The cluster flats are assumed to form part of the affordable rented tenure. Details will be agreed as part of the reserved matters.

In response to comments from Officers, the proposed indicative affordable tenure mix has been amended to include 25% first homes, 5% shared ownership and 70% affordable rent units. We have also taken on board Officers comments with regards to the indicative housing mix with the affordable rent tenure only including 14 flats (16%) and the remainder provided through houses.

#### Design, Green Infrastructure and Landscape

As outlined above and detailed on the accompanying drawings and reports (including the Design and Access Statement Addendum) significant revisions have been made to the application scheme to address the comments made by Council Officers as well as seeking to address concerns raised by local residents, where possible.

Although the application is in outline, full details of the SANG have been provided. The SANG design has evolved following discussions with Natural England (prior to the application) and, more recently, with Officers. Specifically:

- The loop footpath has been amended to create a variety of walking options, extending to the north side of Barkham Road and has been reviewed through the northern woodland to avoid existing trees, wet woodland and marshy ground as much as possible. In permanently wet areas the use of boardwalks is proposed.
- Productive landscape areas have been reviewed and a single allotment area is now proposed off the main access road from Barkham Road along with two community orchards.



- A combined SANG and allotment car park is proposed off the main access road from Barkham Road.
- Landscape buffer planting (hedgerows and trees) has been increased at the interface of the SANG with the access road and developable areas, as well as close to the proposed allotment.

With regards to play space, the larger play space (NEAP) is now proposed within the south east of the SANG. A smaller play space (LEAP) is also proposed in the eastern parcel.

An Open Space Typology Plan is provided for information and demonstrates that the proposals are in accordance with Policy TBo8 of the Local Plan. For clarity the updated open space provision breakdown is set out in the table below.

OS Typology	Standard	Required (ha)	Provided (ha)
Parks and Gardens	1.1	0.92	1.08
Natural/Semi Natural Green Space	2.84	2.39	4.74
Amenity Green Space	0.98	0.82	2.14
Play	0.25	0.21	0.21
Civic Space	0.01	0.01	0.02
Outdoor Sports Facilities	1.66	1.39	n/a
Allotments (including Orchards)	0.52	0.44	0.45
SANG	2	1.68	9.96
Total		7.86	18.60

Following comments from the Public Right of Way (PRoW) Officer, the design team have reviewed the sites movement strategy and a plan can be found in Figure 40 of the DAS Addendum. A number of pedestrian and cycle links will be provided across the site including an east-west route from Doles Lane through to Leslie Sears playing field. In line with the PRoW Officers comments this will offer new active travel options for users seeking access to the Molly Millars Industrial Estate and shopping facilities beyond as well as providing access to the playing field for the residents of the proposed development. The precise details of the routes will be agreed at reserved matters stage.

The LVIA Addendum has been produced which provides a supplementary assessment of the potential impacts of the Proposed Development on land adjacent to Blagrove Lane, Wokingham in relation to landscape and visual effects.

The Addendum concludes the changes made to the development parameters would not result in any significant increase in impacts upon the landscape and visual receptors. The landscape effects from construction, post completion and post establishment of mitigation would remain largely unchanged. The visual receptors to the immediate southwest of the Western Parcel would experience a slight increase in the potential impact, resulting in a short term increase in effect, from Minor Adverse to Minor to Moderate Adverse. However, in the long term, the landscape and visual effects remain unchanged.



### Lighting

With regards to the comments on lighting, an illustrative lighting strategy is provided in Section 4, part 13 of the DAS Addendum. This proposes three lighting zones:

Zone 1: This is primarily the western part of the site and is primarily a no lighting zone with minimum necessary lighting proposed at the Barkham Road access and along the access road for highway safety purposes.

Zone 2: This includes the green corridors and open spaces and is a limited lighting zone, with low level bollard lighting proposed for public safety.

Zone 3: These are the development areas where lighting will include street lighting, pedestrian column lighting and low level bollard lighting.

Full details of the lighting strategy are to be provided and agreed at reserved matters stage.

## **Highways/Access and Parking**

Two Transport Assessment Addendums accompany the updated submission, the first Addendum responds to the Highway Officers comments on the original submission, addressing each comment in turn. Following comments from Officers, a revised layout is proposed at the access to the site off Blagrove Lane. This minimises the impact on the listed farmhouse and associated buildings. The Addendum concludes that all the information requested has been provided and Highways Officers will now be able to provide a positive recommendation to the application.

The second Addendum sets out the updated proposals and assesses the impact of the inclusion of the care home on the local highway network. It concludes that the revised scheme will have a reduced impact on the local highway network compared to the initial proposals and, therefore there should be no objection to the amended uses on highway grounds.

## **Energy & Sustainability**

Updated Energy and Sustainability Reports accompany the submission which address the comments made by the Sustainability Planning Officer in November 2022.

The Statements confirm that the key sustainability features of the original scheme remain, however, the proposals will now target a 21.6% reduction in CO2 emissions from renewable energy technologies.

### **Drainage**

An updated Flood Risk Assessment and Drainage Strategy Report accompanies the updated submission. The conclusions of the original report (July 2022) remain and further to this it confirms:

- Filter strips are proposed adjacent to the new access road to provide water quality benefits, whilst allowing the existing hydrology within the woodland to be retained.
- Existing ditches will be culverted under the proposed road and options to maximise the wet
  woodland extents will be explored by throttling flows through the culverts subject to further
  modelling and in accordance with the Drainage Officer's recommended planning conditions.



#### **Ecology**

A response to comments from the WBC Ecology Officer, BBOWT, Natural England and the Binfield Badger Group accompanies the submission along with an updated BIA Technical Note and Metric and a Bat Survey Report.

The response confirms that no materially significant changes to the extent and character of the habitats present on the site have arisen since the original ecological survey work and addresses each matter raised in turn. It highlights:

- Design amendments have been carried out to minimise the footprint of the road design through Bottle Copse Local Wildlife Site. Proposals for a swale have been removed and replaced with a gravel trench which has a reduced land take. It highlights the other measures proposed including the use of filter drains to maintain hydrology and engineered gravel to intercept pollutants, lighting of the access off Barkham Road and the access road being the minimum necessary for highway safety, tree protection and noise and dust management in place throughout construction and the footprint of the road through the woodland being kept to the smallest area possible.
- It is proposed to improve connectivity through the wider site with woodland, hedgerow and scrub planting.
- It is proposed that a hedgerow compensation strategy is prepared to accompany each reserved matters application to assess in detail the avoidance/mitigation/compensation proposed in relation to each phase coming forward. Enhancement of the retained hedgerows is proposed with the provision of over 4.2km of new native hedgerows on the site.
- Further information has been provided on the protected and notable species surveys and updated bat and badger surveys have been provided.

Further to this, as set out in the BIA Technical Note, the BIA calculation based on the emerging landscape scheme indicates there is a small net gain for 'broad habitats' and a substantial net gain for 'linear habitats' and 'watercourse habitats'. Additional opportunities for further increasing the net gains for biodiversity may arise at the detailed design stage.

#### **Agricultural Land**

An Agricultural Land Quality report (December 2022) has been produced and accompanies this revised submission. It concludes approximately half of the agricultural land at the site is of Grade 2 quality (nearly 13ha) and half of the agricultural land (13 ha) is of Subgrade 3a quality, with approximately 5ha of non-agricultural land in the site. Whilst it is acknowledged that Policy CP1 references avoiding development of areas of best and most versatile agricultural land and the NPPF (para 174b) requires the consideration of economic and other benefits of the best and most versatile agricultural land, in practice the land quality is limited by soil wetness and/or workability.

Information from the current long-term owners of the site also confirms that the value of the land for agriculture is very low in real world terms. They have advised the applicant that there is no realistic prospect of the land being used for food production in the foreseeable future. This is due to the current uses of the land, land ownerships including sizes of the plots, the presence of trees, availability of water for grazing and the current site drainage conditions.



The main field west of Blagrove Lane and northern part of field east of Blagrove Lane were purchased in 1978 and the land was grazed with cattle for one year, but this ceased because the land was too wet and the ground became badly poached. It is now grazed with horse with an annual hay cut. The paddocks north of Doles Lane are used for low-value grazing, mainly sheep and horses. Finally, the fields east of Blagrove Lane (south) have for the past 55 years only been used to make meadow hay with no animal grazing or use for arable crops.

The economic benefits of retaining the site for grazing and hay cutting are minimal, relative to the economic benefits that will arise from the construction and occupation of the site by the proposed development. On this basis only limited weight can be afforded to this harm.

#### **Environmental Health**

The comments and suggested conditions provided by the Council's Environmental Health team are noted. An updated Construction Management Plan prepared by Berkeley and Lichfields accompanies this updated submission.

As set out above, the revised scheme will have a reduced impact on the local highway network compared to the original submission and therefore air quality has not been reassessed.

## **Community Responses**

As part of our review of the application proposals we have taken account of the responses received from the local community. We set out below some of the key topics raised and our response.

Topic	Response
Ecology – negative impact on wildlife and habitats and loss of ancient woodland	The proposals have been informed by a comprehensive programme of ecological surveys. These have guided the proposals from an early stage. There is no loss of ancient woodland proposed. The access road will have a degree of impact on the Local Wildlife Site (LWS). This woodland has grown up since the 1960s and is not ancient. However, the road alignment has been carefully designed to minimise and mitigate the impact. For example, the road has been designed to avoid the more valuable trees species and make use of the clearing under the powerlines. A range of measures have been incorporated to minimise the impact on protected species including badgers. The wider proposals include extensive new native tree and hedge planting to outweigh the loss of trees and achieve a net biodiversity gain. Please refer to the ecological reports.
Landscape – SANG artificial, development not suitable for rural, countryside setting.	The SANG will provide a naturalistic area of green space compared to the existing areas of paddocks and rough grazing currently separated by barbed wire fencing. The SANG has been carefully designed to respect the local landscape setting and includes native planting and habitat features to help deliver a net biodiversity gain across the site.
Transport – Impact on the existing road network and road safety particularly at junction	A comprehensive Transport Assessment (TA) has been carried out and has found that there is sufficient capacity on the local network to accommodate the proposed development. A range of proposed



Topic	Response
	mitigation measures are included in the TA. The proposed junction on Barkham Road has been carefully designed, subject to a safety audit and found to be acceptable. New crossing points are to be provided on Barkham Road. The proposed development includes downgrading a section of Blagrove Lane to provide an improved route for pedestrians a cyclists alongside new walking and cycling routes proposed within the site connecting to the local area. A bus route is proposed to be diverted via the site. Therefore, there will be sustainable alternative travel options available to residents should they wish to use them
Parking – not sufficient to support residents and visitors and no public parking proposed for SANG causing on street parking	Whilst parking will be addressed at reserved matter stages, the TA includes an explanation of the outline approach. Every dwelling will have at least 1 car parking space in addition to a significant number of unallocated / visitor spaces. A SANG car park has now been included to cater for external visitors.
Infrastructure – not enough school and healthcare capacity to support development	The proposed development will generate a significant Community Infrastructure Levy (CIL) contribution, currently expected to be over £10 million. This will provide the Council with funding for off-site local infrastructure including additional school places where required.
Settlement Gap – will erode gap between Wokingham Town and Barkham Village.	Whilst it is acknowledged that the proposed development will extend the urban area, the proposed SANG is situated to ensure a permanent green gap is maintained between Wokingham and Barkham.
Pollution and Air Quality – development lead to increased light, noise and air pollution	The outline lighting strategy sets principles for lighting to ensure the impacts on the landscape and ecology of the site is minimised.  The development is unlikely to lead to any unacceptable noise in its operational phase whilst in the construction phases appropriate mitigation measures will be employed as set out in the outline Construction Management Plan (CMP).
Flood Risk – development will urbanise area causing increase risk of flooding	This issue has been addressed in the Flood Risk and Drainage Assessment. The drainage assessment includes a series of sustainable drainage features including ponds and swales to ensure no increased levels of surface water flooding.



## **Concluding Remarks**

The applicant welcomes the post submission dialogue that has taken place with the Council which has resulted in significant revisions to the scheme including addressing matters raised by Officers and other consultees. The updated submission provides clarification on a number of matters raised through the statutory consultation process.

We look forward to discussing the updated submission with you further but in the meantime please do not hesitate to contact Daniel Lampard or myself if you have any queries.

Yours sincerely

**Sarah Moorhouse** 

Associate Director BA (Hons) DipTP MRTPI



# **Annex 1: Drawing Schedule**

## **Updated Parameter and Access Plans (For Approval)**

Drawing Name	Original Drawing Number	Superseded/No Change New/Removed	Revised/New Drawing Number
Land Use and Access Parameter Plan	PPo2 Rev A	Superseded	PP02 Rev G
Green Infrastructure Parameter Plan	PPo3 Rev A	Superseded	PPo3 Rev I
Building Heights Parameter Plan		New	PPo6 Rev C
SANG General Arrangement Plan		New	BMD.22.0018.DR.00 1 Rev F
Barkham Road Site Access		New	4200322-skoo8 Rev P1
Blagrove Lane Southern Site Access		New	4200322-sk015 Rev P1
Blagrove Lane Northern Site Access		New	4200322-sk087 Rev P1
Blagrove Lane – Northern Emergency Access		New	4200322-sk070 Rev P1

## **Illustrative Plans**

Drawing Name	Original Drawing Number	Superseded/No Change New/Removed	Revised/New Drawing Number
Illustrative Development Framework Plan	PPo4 Rev B	Superseded	PPo4 Rev M
Illustrative Masterplan	PPo5 Rev B	Superseded	PPo5 Rev H
Access Plan		New	PCo1 Rev C
Open Space Typology Plan		New	OST01 Rev D
SANG Illustrative Masterplan		New	BMD.22.0018.DR.00 2 Rev C
Woodland Illustrative Masterplan		New	BMD.22.0018.DR.00 3 Rev A
Woodland Landscape Section 1		New	BMD.22.0018.DR.40 o Rev B
Woodland Landscape Section		New	BMD.22.0018.DR.40 1 Rev B
Hedgerow Retention Corridor Typical Section		New	BMD.22.0018.DR.40 2 Rev A