

PLANNING REF : 261825
PROPERTY ADDRESS : Merchiston
: Blakes Lane, Berkshire
: RG10 9TA
SUBMITTED BY : Mrs Erin Barber
DATE SUBMITTED : 02/09/2026

COMMENTS:

We are writing as the immediate neighbours of the application site to object to planning application 261825, for the demolition of existing horticultural structures and the erection of a single six-bedroom dwelling (734 sqm GIA, 2,346 m²) on this 0.42ha site. We have owned Merchiston since 2016 and have maintained close and continuous knowledge of the site and its condition throughout. This objection also responds to the applicant's NPPF Addendum, submitted following publication of the revised NPPF on 17 August 2026, which reframes the application's national policy case using the new lettered policy structure. We set out below the material planning considerations on which this objection is based.

1. Previously developed land, and the separate test under policy GB7(1)(g)(i)

The application appears to rely, at least in part, on the site being treated as "Grey Belt" under NPPF policy GB2. Grey Belt status is not a single test: land qualifies if it is either previously developed land, or land that does not strongly contribute to any of Green Belt purposes (a), (b), or (d). Because it is an "and/or" test, showing that the site is not previously developed land would not, on its own, rule out Grey Belt status. We therefore address both limbs below: why the site is not previously developed land, and why, regardless, the proposal fails the separate test under policy GB7 governing whether grey belt development can be treated as not inappropriate.

First, the site is not previously developed land. A 2018 appeal decision on this site (APP/X0360/W/17/3184577) considered this point directly: the Inspector found that the site's last use was as a horticultural nursery, an agricultural use, and concluded that these buildings do not fall within the definition of previously developed land as set out in the Framework (paragraphs 3 to 6 of the decision). This is reinforced by a Certificate of Lawfulness granted under section 191 of the Town and Country Planning Act 1990 (application 152003, granted 28 October 2015), which confirms the same last lawful use, storage associated with a nursery business. That certificate records that the land was found, on the balance of probability, to have been used for storage associated with a nursery business for ten consecutive years, and its First Schedule confines the certified use to storage, not the production or sale of any horticultural product. The certified site plan (reference MW/HH/04) shows this storage use was accommodated within three modest, single-storey buildings, with a combined footprint of approximately 203 m² and a combined volume, calculated conservatively from footprint and eaves height, of approximately 722 m³. That is the certified built development the 2015 certificate treats as the lawful baseline within the certified area, and it is against that baseline, not any assumption of more extensive historic development, that the scale of the current

proposal should be judged. We would note that the certified area shown on plan MW/HH/04 is a defined area within the wider application site and does not extend across the whole 0.42ha site; we would ask the council to confirm the relationship between the certified area and the remainder of the application site, and the planning status of that remainder, when assessing the previously-developed-land question. The 2018 appeal decision, by contrast, considered the application site as a whole and remains the primary evidence for that broader assessment. Copies of the certificate and site plan are available on request.

We would also note that the applicant's NPPF Addendum now describes the site as "enclosed," "already developed," and possessing "extensive hardstanding" in support of its Grey Belt case. That description sits uneasily with the 2018 Inspector's finding that the site was open in aspect and sensitive to change, with the council's 2016 Green Belt Review addressed below, and with the Certificate of Lawfulness itself, which records a certified built footprint of only around 203 m across three small storage buildings. We would ask the council to test the Addendum's characterisation of the site against this existing evidence before accepting it.

Additionally, the Addendum relies in part on the certified storage use as a fallback position, suggesting it could resume and generate commercial vehicle movements if this application were refused. Given that the certified use covers a footprint of only around 203 m across three small buildings, we do not think this fallback is capable of generating the scale of activity the Addendum implies, and we would ask the council to treat this argument with appropriate caution rather than as a significant point in the applicant's favour.

Second, and separately, even if the site were accepted as Grey Belt, that alone would not make the proposed development "not inappropriate" in the Green Belt. Policy GB7(1)(g) sets out several requirements that grey belt development must satisfy before it can be treated as not inappropriate, and limb (i) requires that the development would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan. The wording makes this test broader than the individual site, and it is not confined to the three purposes, (a), (b) and (d), used to define Grey Belt status in the first place: the purposes taken together include safeguarding the countryside from encroachment. But the site's own contribution to that purpose is relevant evidence when assessing whether its development would fundamentally undermine the remaining Green Belt. The applicant's NPPF Addendum addresses only purposes (a), (b) and (d) when assessing this limb, and does not engage with encroachment at all. As set out below, the council's own evidence base identifies this specific parcel as making a genuine contribution to that purpose and as vulnerable to incremental change, and we consider that parcel-specific finding, reinforced by the pattern of comparable sites addressed at section 3 below, capable of satisfying this broader test.

The 2018 Inspector on this site found that the greater bulk and size

of a far smaller proposed dwelling would harm the openness of the Green Belt (paragraphs 7 to 9 of the decision), and separately found harm to the character and appearance of the surrounding countryside (paragraphs 10 to 13). If a substantially smaller dwelling was found to harm openness through its bulk and size alone, why is a 2,346 m house appropriate here, on this very site, when the Inspector already reached that finding on a materially smaller proposal? The vegetation that existed at that time has since been cleared from the site, though the horticultural structures identified in the Certificate of Lawfulness remain standing, pending the demolition proposed under this very application. The site is already more open in aspect than at the time of the 2018 appeal, even before those structures are removed. This is reinforced by the site's position within a wooded corridor connecting Bowsey Hill to the north, part of the Ashley and Bowsey Hills Biodiversity Opportunity Area, to Cutlers Copse immediately to the south and The Holt beyond it, which together contribute to the openness and countryside character of the area.

This is also consistent with the council's own evidence base. The council's 2016 Green Belt Review assesses the parcel containing this site (Parcel W11/W12, bounded by Highfield Road, Blakes Lane and the A4 Bath Road) as making a genuine contribution to safeguarding the countryside from encroachment, describing the land as protecting land which is open in aspect and sensitive to change, and as helping contain the north eastern fringes of Wargrave, which is potentially vulnerable to incremental change. On its own, that finding would not be sufficient to show this single application fails GB7(1)(g)(i); it is the combination of that recognised vulnerability with the presence of other comparable parcels nearby reinforcing it, addressed at section 3 below, that is capable of undermining the purposes of the remaining Green Belt across the plan area.

On the basis of the parcel-specific evidence set out above, reinforced by the context identified at section 3 below, we would ask the council to treat this as a basis for concluding that the proposal does not satisfy GB7(1)(g)(i), independent of how the underlying Grey Belt question is ultimately resolved. GB7(1)(g)'s requirements are cumulative: even if the council accepts, as the applicant's NPPF Addendum argues, that there is an evidenced unmet housing need under limb (ii), that would not remedy a failure to satisfy limb (i). On this basis, the proposal remains inappropriate development in the Green Belt, which by definition should be given substantial weight against it.

We would also note that the applicant's NPPF Addendum places cant weight on the council's pre-application advice, both in support of its Grey Belt conclusion and, in its concluding remarks, as a basis for suggesting that refusal would require the council to explain why it has departed from that advice. Pre-application advice is expressly non-binding: it cannot pre-empt the council's determination of the actual application, and the council is free to reach a different conclusion once the application has been fully assessed against the evidence and objections properly before it, without needing to justify a departure from an earlier informal view. We would ask the

council to determine this application on its own merits, on the evidence and objections before it, rather than treating earlier pre-application correspondence as constraining its conclusion.

2. Conflict with local countryside policy CP11

Beyond Green Belt policy, the proposal must also be considered against Wokingham's own local countryside policy, CP11 (Proposals outside Development Limits, including countryside). This policy states that development in this location will not normally be permitted, except within a narrow set of recognised exceptions: conversion of existing buildings rather than new-build, rural enterprise or recreational use, and development that avoids excessive expansion away from what already exists.

The proposal does not fall within any of these exceptions. It is not a conversion: the application is for demolition of the existing structures and construction of an entirely new dwelling. It is not rural enterprise or recreational use: it is a private residential dwelling with no such function. And far from avoiding excessive expansion, it represents a very substantial increase in scale, from modest, low-rise horticultural structures to a 734 sqm, six-bedroom house, which is precisely the kind of expansion CP11 exists to prevent.

Tellingly, the applicant's own Planning Statement (paragraphs 6.24 to 6.26) does not engage with these specific exceptions; it refers only to general policy "aims", without addressing why the proposal should be treated as falling within any recognised exception to CP11's default position against development in this location.

We understand the applicant's NPPF Addendum now argues that CP11 is materially inconsistent with the August 2026 NPPF and should carry only very limited weight under Annex A, on the basis that it reflects an obsolete 2010 spatial strategy and that the borough's housing land supply shortfall means restrictive countryside policies should not stand in the way of individual schemes. We do not think this follows. CP11's function, preventing unjustified expansion of development outside settlement limits, is not itself inconsistent with the framework, and a general housing shortfall does not, without more, mean that a specific proposal in a specific location must be treated as compliant with it. The appeal decision cited in support of that argument, APP/X0360/W/25/3361360, was itself dismissed on design and character grounds, which suggests that a housing shortfall alone does not displace legitimate planning objections to a particular scheme. We would ask the council to reach its own view on the weight to be given to CP11 rather than adopting the Addendum's position without independent scrutiny.

On this basis, we do not believe the application can comply with CP11, and we would ask that this be treated as a freestanding reason for refusal in its own right, independent of the Green Belt and Grey Belt points above.

3. Comparable parcels and vulnerability to incremental change

We recognise that every planning application must be decided on its own merits, and we do not suggest otherwise. Our concern is narrower and more specific: the site shares a particular combination of features with other parcels across the surrounding parish, former agricultural or horticultural use, recent vegetation clearance, and Green Belt designation. Several comparable parcels of this kind exist in the immediate area, demonstrating that this is not an isolated piece of Green Belt land.

This is consistent with the council's own 2016 Green Belt Review, which identifies this part of the parish as land that helps contain the north eastern fringes of Wargrave and describes it as vulnerable to incremental change. We would ask the council to weigh that context, tied to the same Green Belt and CP11 harms established above, when assessing this application, rather than treating the site as an isolated exception.

4. Siting on the plot and future development via permitted development rights

Separate from the question of overall volume, we are concerned about how the dwelling is sited on the plot itself. The proposed house is not centrally positioned within the site but sits close to the shared boundary with Merchiston, increasing its visual prominence in this Green Belt setting and its impact on neighbouring land, and leaving substantial additional land around it that could, in principle, be built upon later.

This is compounded by the absence of any condition to prevent it. Unlike the condition attached to Merchiston, which required permitted development rights to be relinquished as the price of its own permitted volume, we can see no equivalent condition proposed here. If the dwelling is granted as submitted, the applicants would retain the standard householder permitted development rights that ordinarily attach to a dwelling of this scale. Those rights are subject to the limits, conditions and exclusions set out in the General Permitted Development Order, but within those limits would still allow further extensions, outbuildings, and hardstanding to be added later without the further planning permission or public scrutiny that would otherwise apply. Given the size of the dwelling already proposed, the scope for further development within those GPDO limits would be correspondingly generous, and could add materially to the built footprint and hardstanding on this Green Belt site.

We also question whether this siting was necessary in the first place. The applicant's Design and Access Statement justifies it by reference to the site's boundary tree cover, describing the developable area as constrained by "mature boundary screening". Neither that document nor the Arboricultural Impact Assessment, which identifies the trees and root protection areas to be retained, shows that a smaller dwelling positioned centrally within the plot, equally distant from all boundaries, was ever tested against the same tree constraints. The council should establish whether a materially smaller dwelling could be positioned further from the shared boundary without the loss of any protected trees. Absent evidence that this alternative was considered and rejected, we do not think the current siting should

be accepted as the only option available.

We would ask that, if the council is minded to grant permission in any form, a condition removing permitted development rights, matching the approach taken for Merchiston, be attached, and that the siting of any dwelling be reconsidered so that it sits centrally within the plot, away from neighbouring boundaries, rather than in its current position.

5. Scale and harm to openness, including in comparison to Merchiston

The proposed dwelling is substantially larger than anything else in its immediate context, and this is not simply a matter of appearance. Case law on Green Belt openness (Turner v Secretary of State for Communities and Local Government [2016] EWCA Civ 466) confirms that openness is a spatial and visual concept, and that the bulk and volume of a building are capable of being a material consideration in assessing spatial openness, alongside its visual and landscape impact.

Our own property, Merchiston, provides a directly relevant local comparator. Its actual built volume, comprising the main dwelling, bothy and garage, totals approximately 1,546 m³. That volume was permitted under application 173515 (decided 21 March 2018, following referral to the council's Planning Committee), which imposed a condition (Condition 6) removing permitted development rights in order to safeguard the character of the Green Belt and neighbouring amenities. The application before the council proposes 2,346 m³, roughly 800 m³ more than Merchiston's actual built volume, on a site with a materially weaker planning history than Merchiston's. We would ask the council to treat the Merchiston volume, and the condition attached to it, as a directly relevant local planning comparator for what has previously been considered acceptable in this specific setting, and to apply the same standard of scrutiny, including an equivalent condition removing permitted development rights, to the current proposal.

The application site's own planning history provides an equally relevant comparator. As set out at section 1 above, the certified lawful buildings on the site totalled approximately 203 m² of footprint and approximately 722 m³ of volume. The proposed dwelling, at 734 sqm GIA and 2,346 m³, represents an increase of roughly 3.6 times that footprint and more than three times that volume. Whether judged against Merchiston or against the site's own certified history, the proposed scale is a very substantial escalation, and is not, in our view, capable of being characterised as proportionate or limited development of the kind that might otherwise be considered acceptable in this Green Belt location.

6. Ecological baseline and timing of site clearance

Clearance of vegetation on the site began on 5 March 2026, within the UK bird nesting season (broadly 1 March to 31 August), and involved heavy machinery operating in the vicinity of trees protected by a Tree Preservation Order. This raises separate questions of

compliance with both section 1 of the Wildlife and Countryside Act 1981 and the Tree Preservation Order covering trees on or near the site. This clearance is well documented: we hold photographs and video footage of the works, including the machinery used, and a set of aerial images taken before and after the clearance clearly show the site's condition changing from green, vegetated cover to bare, cleared, brown ground. We are making this evidence available to the council so that it has an accurate record of both the scale and the timing of what took place.

For the purposes of this planning objection, our concern is that the Preliminary Ecological Appraisal was carried out on 7 July 2026, after this clearance, and describes the site as "previously unmanaged" without reference to the intervening works. Photographic evidence from around the appraisal date shows fresh woodchip, brash piles, and recent felling that are not consistent with long-term neglect.

Because the ecological appraisal post-dates the clearance, we would ask the council to establish whether it accurately reflects the site's condition before the March 2026 works and, if not, whether a retrospective assessment of pre-clearance habitat condition is required. The 2018 Inspector's findings at paragraphs 14 to 18, made well before this clearance took place, offer an independent, pre-clearance picture of the site's ecological character that we would ask the council to take into account in making that assessment.

7. Self-build status and the biodiversity net gain exemption

The application relies on a self-build exemption from biodiversity net gain requirements, supported by a CIL Form 7 Part 1 declaration signed by the applicants. That CIL declaration carries its own three-year occupancy tie, with criminal liability under CIL Regulation 110 for a false declaration, but it is made under a separate statutory regime: the BNG self-build exemption itself contains no equivalent occupancy condition. We can find no evidence in the published application documents, beyond the declaration itself, that genuine self-build occupation has been tested, verified, or secured in any binding way, and the BNG Exemption Statement referred to in the Planning Statement and the Preliminary Ecological Appraisal does not appear in the public document record for this application.

We would also ask the council to confirm the precise validated date of this application. The self-build exemption from biodiversity net gain was abolished, for applications made on or after 6 August 2026, by SI 2026/790. The application appears to have been made on 5 August 2026, one day before that change took effect, and its continued eligibility for the exemption therefore turns on that date being correct. The site's recent history already includes at least one document whose account of the site's condition did not match the physical evidence, namely the Preliminary Ecological Appraisal's description of the site as previously unmanaged when it had in fact been substantially cleared some four months earlier. Given that, we do not think the stated application date should be taken at face value, and we would ask the council to verify it independently against its own validation records before relying on the exemption.

We would also note that the self-build exemption exists to support individuals building a home for their own long-term occupation, not as a general route around biodiversity net gain obligations for substantial new development. A six-bedroom, 734 sqm dwelling on a 0.42ha site is a significant undertaking, and taken together with the absence of any occupancy safeguard, the absence of a condition removing permitted development rights (see section 4 above), and the missing exemption statement, we think the council should satisfy itself that the statutory requirements for the exemption are met and that the evidence submitted is sufficient to demonstrate that, rather than treating the exemption as automatically available on the strength of the declaration alone.

8. Design and character harm

Independently of the Green Belt openness point above, we consider the scale, form, and prominence of the proposed dwelling to be out of keeping with the surrounding built and landscape character, contrary to NPPF Chapter 12 and the council's Design Guide SPD. This is a freestanding concern that would apply whether or not the Green Belt and Grey Belt arguments above are accepted.

9. Drainage

The submitted Drainage Strategy does not include BRE Digest 365-compliant percolation testing. The only site investigation recorded is a single excavation, dug and filled with water to observe whether it drained, together with a desk-based reference to British Geological Survey borehole maps; neither constitutes the standardised, multi-point testing that BRE Digest 365 requires. The strategy also does not include any site-specific groundwater or hydrogeological assessment, and does not assess the capacity of the receiving roadside ditch to accept additional flows. The strategy's own hydraulic modelling shows the network in a surcharged state at multiple points under both the 30-year and the 100-year plus 40% climate change storm scenarios, with surcharging appearing even under a routine 2-year storm event.

We would also note that the Drainage Strategy does not appear to have been properly localised to this site. It repeatedly names Anglian Water as the responsible sewerage undertaker and states that installations should be built in line with Anglian Water's requirements, and separately cites Norfolk County Council's own SuDS guidance as the relevant local authority guidance. Neither Anglian Water nor Norfolk County Council has any jurisdiction over this site: it is served by Thames Water, and the relevant lead local flood authority is Wokingham Borough Council. This suggests the report may draw on a template from an unrelated project elsewhere in the country, and raises real doubts about how carefully its site-specific technical content has been checked before submission.

Separately, we question the evidential basis for the proposed reliance on an existing ditch for drainage. The Design and Access Statement identifies "potential for SuDS drainage (existing

ditch)" on its illustrative ecology and biodiversity page, alongside a wild meadow and a private garden that are self-evidently generic stock photography rather than photographs of this site. We would ask the council to establish the ditch's actual location, condition and capacity from the Drainage Strategy's own survey, not from illustrative material. Separately, we understand that a neighbouring landowner to the rear of the site, whose land the ditch runs through or discharges into, owns and maintains that section and has not been approached for, nor given, any consent for its use. We raise this as a question for the council to satisfy itself on, not as an assertion of fact, but a drainage strategy dependent on land or a watercourse the applicant does not own or control cannot be regarded as deliverable, and we would ask the council to confirm what legal interest, consent, or agreement the applicant holds before the strategy is relied upon.

Additionally, any percolation or groundwater testing carried out now, during the current drought conditions affecting the Thames area, cannot reliably represent normal seasonal conditions and should not be relied upon as a design basis without being repeated outside drought conditions. Separately, the removal of mature trees on the site will reduce canopy interception and transpiration, increasing the volume of surface water reaching the drainage network at exactly the point where its capacity is already in question. We are also aware that a neighbouring landowner on the opposite side of the same ditch system has infilled their section, and that adjoining fields waterlog regularly, both of which suggest the receiving watercourse cannot simply be assumed to be functional.

Finally, we are concerned about the compounding effect of these changes taken together. The watercourse serving this site runs, for at least part of its course, in an enclosed or culverted section below ground, and we are not aware of any overflow or bypass route that would allow excess water to escape safely if that culvert reaches capacity. The loss of the mature trees along the site's boundaries and the introduction of substantial new hardstanding in close proximity to those same boundaries will increase both the volume and the speed of surface water runoff reaching that watercourse. Without a bypass, any point at which the culvert becomes overwhelmed would have nowhere for that water to go, particularly during the kind of intense rainfall events the drainage strategy's own modelling already shows the wider system struggling to cope with.

Conclusion

For the reasons set out above, we do not consider that the site qualifies for Grey Belt treatment, that the scale and siting of the proposed dwelling is acceptable in this location, that the application demonstrates compliance with local countryside policy, that its ecological baseline can be relied upon, that its self-build exemption has been adequately evidenced, or that its drainage strategy is sound. We would ask that the application be refused.

If, notwithstanding the above, the council does not consider the Grey Belt and Green Belt objections sufficient on their own to justify

refusal, we would ask that any dwelling permitted on this site be materially smaller and more modest than that proposed, sited centrally within the plot and away from neighbouring boundaries, and subject to a condition removing permitted development rights, consistent with the approach taken for Merchiston. The scheme as submitted, in its current scale and siting, should not be approved. Given the number of substantive and unresolved issues raised by this and other objections, we would also ask that, if officers are minded to recommend approval in any form, the application be referred to committee for full determination rather than decided under delegated powers.

We would be grateful if the council could confirm receipt of this objection and keep us informed of the progress of the application.

Yours faithfully,
Erin Barber & Ben Waterhouse