

Date: 13 January 2025
Application: 243120



**WOKINGHAM
BOROUGH COUNCIL**

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Pre-application Advice Response Letter

Application Number: 243120

Site Address: Land adjacent to Pound Lane Cottage, Pound Lane, Hurst,
RG10 0RS

Expiry Date: 10 January 2025

Proposal: Pre-application advice for the proposed change of use of land to a mixed use consisting of builders contractors storage and the keeping of goats, plus the associated erection of 2 no. storage buildings.

Dear Mr Davis

Thank you for your request for planning advice which was validated on 13 December 2024. This letter will provide advice about your scheme and what you may need to do when submitting a planning application.

At this stage, we have not consulted anyone else about your scheme, such as neighbouring properties, but we would do so if a planning application is submitted. Should you decide to submit a planning application, we recommend that you carry out your own public consultation and provide evidence of this through a Statement of Community Involvement.

We have provided a [frequently asked questions page](#) to answer some of the common queries about planning which will help explain the planning application process.

Site and Surroundings

The application site is a 2,330sqm (approx.) parcel of land sited towards the southern end of a single-track private road accessed from Pound Lane to the North.

A large area of hardstanding was laid in 2024 covering almost the entire site. This hardstanding is unauthorised and does not benefit from planning permission.

The site has no planning history and according to available aerial imagery had never been developed prior to the laying of the hardstanding, with the exception of two smaller storage buildings that have now since been demolished. Historic aerials appear to conclude that the land was used for agricultural purposes as tractor tracks are visible on historic aerials from 2004.

The site's immediate context is predominantly rural consisting of open fields to the west, a farmyard to the immediate north and a scatter of large, detached houses to the east/north-east. There is also a dog kennel at the end of the southern access track.

The site is located within the designated Countryside and located wholly within the within the landscape character area (LCA) I1 known as 'Ashridge Farmed Clay Lowland'.

Description of Proposal

This pre-application seeks advice for the proposed change of use of the land to a mixed use consisting of builders contractors storage and the keeping of goats, plus the associated erection of 2 no. storage buildings.

The keeping of goats would take up a majority of the site's footprint, covering approx. 1370sqm of land to the west and would abut the western boundary of the site. A modest storage/feed building would be sited on the footprint of the original 'potting' shed which has now collapsed.

The eastern portion would host the storage areas (960sqm approx.) and would include a gravel track and gates for vehicular access. A second storage building is proposed and would be to store equipment. It is proposed to be used as a small compound area to store the owner's building contractor equipment and some machinery. The outdoor area would house modest quantities of bricks, tiles, herras fencing, scaffold poles/boards, trestles and ladders. In terms of machinery, this is likely to include a digger, cement mixer and trailer. All of this equipment and machinery is in the applicant's ownership and would be transported off site for work purposes as and when required.

Planning Constraints

The following planning constraints have been identified in relation to the site:

Bat Roost Habitat Suitability

Scale and Location of Development Proposals – Countryside (CP11)

Great Crested Newt Consultation Zone – Red Risk Zone

Ground Water Zones

Nuclear Consultation Zone – Special Case Zone

Landscape Character Assessment Area - Ashridge Farmed Clay Lowland

SSSI Impact Risk Zones

Site History

The site has no planning history.

Assessment of Proposal & Key Issues

Principle of Development:

Policy Context:

Core Strategy 2010:

The site lies within the Countryside as designated in the Wokingham Borough Core Strategy. Core Strategy policy CP11 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 except in certain circumstances. These exceptions are:

- 1) It contributes to diverse and sustainable rural enterprises within the borough, or in the case of other countryside based enterprises and activities, it contributes and/or promotes recreation in, and enjoyment of, the countryside; and
- 2) It does not lead to excessive encroachment or expansion of development away from the original buildings; and
- 3) It is contained within suitably located buildings which are appropriate for conversion, or in the case of replacement buildings would bring about environmental improvement; or
- 4) In the case of residential extensions, does not result in inappropriate increases in the scale, form or footprint of the original building;
- 5) In the case of replacement dwellings the proposal must:
 - i) Bring about environmental improvements;
 - or ii) Not result in inappropriate increases in the scale, form or footprint of the original building.
- 6) Essential community facilities cannot be accommodated within development limits or through the re-use/replacement of an existing building;
- 7) Affordable housing on rural exception sites in line with CP9.

Managing Development Delivery Local Plan (MDDLDP) 2014:

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

National Planning Policy Framework (NPPF):

The National Planning Policy Framework has an underlying presumption in favour of sustainable development which is carried through to the local Development Plan.

The Managing Development Delivery Local Plan Policy CC01 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.

Paragraph 88 of the NPPF (2024) states that planning policies and decisions should enable:

- a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed, beautiful new buildings;
- b) the development and diversification of agricultural and other land-based rural businesses;

Paragraph 89 of the NPPF states that planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.

Assessment:

Keeping of Goats (Agriculture):

The use of the western portion of the site for agricultural purposes (keeping of goats) is rurally appropriate and no objections are raised to this in principle. The storage/feed building would be sited on the footprint of the collapsed potting shed, would be modest in scale/form and is not considered to result in excessive encroachment or expansion of development away from the original buildings.

Builders Contractors Storage:

Assessment begins with the local development plan, in particular local policy CP11 of the Core Strategy. It should be noted that criteria 1-3 need to all be complied with in order to achieve compliance with this local policy.

In terms of criteria 1, relating to the proposal supporting a diverse and sustainable rural enterprises, the proposal does not relate to a rural enterprise or promotes recreation in, or enjoyment of, the countryside. A building contractor is a use/business which can operate in the countryside but is not dependent on the countryside to operate. Whilst it is noted that a business such as this will require sufficient space to store stock, which the countryside can provide, it is not dependent on, nor reasonably associated with a countryside location.

The convenience of its location for the applicant (who lives directly opposite the site) to use the site to store equipment and materials associated with his existing business is acknowledged, but this is not considered sufficient justification for a change of use of the site to B8 storage.

Overall, it has not been demonstrated that the intended use would support a rural enterprise as required by criteria 1.

Criteria 2 states that development should not lead to excessive encroachment or expansion away from the original buildings. The storage buildings proposed would replace a previously existing storage structure in a very similar location. On the contrary, the erection of large areas of hardstanding, vehicle gates and access road on this undeveloped field and the amount of storage and vehicle movements associated with the intended use is considered excessive in scale in this countryside context. The proposals would unacceptably encroach away from the original buildings and therefore fail to comply with criteria 2.

With regards to criteria 3, whilst the proposal involves replacement buildings, the buildings and associated use of the buildings are not considered to result in environmental improvements, rather they would result in environmental harm.

Overall, the proposal does not constitute a rural enterprise or one that promotes enjoyment or recreation in the countryside and results in excessive expansion from the building in connection with the commercial use. The proposal is therefore contrary to Policy CP11 of the Core Strategy.

Turning to the 2024 NPPF, Part a) of paragraph 88 supports the growth and expansion of all types of businesses in rural areas but of principal importance is that this growth and expansion must be sustainable.

It is acknowledged that paragraph 89 of the NPPF does state that decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. However, in these circumstances it is important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The site is not sustainably located and for reasons raised below, the proposal is not considered to be sensitive to its surroundings and causes harm to the environment.

Paragraph 87 c) of the NPPF states that planning policies and decisions should make provision for storage and distribution operations at a variety of scales and in suitably accessible locations that allow for the efficient and reliable handling of goods, especially where this is needed to support the supply chain, transport innovation and decarbonisation. The site is not suitably accessible other than for the applicant/intended user of the site.

As such, the proposal for the building contractor's storage use does not accord with the NPPF.

Character of the Area/Landscape Character:

Policy Context:

With regards to well-designed places, paragraph 135 of the NPPF states planning policies and decisions should ensure that developments:

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

Paragraph 187(a) of the NPPF requires planning policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes.

Paragraph 187(b) of the NPPF requires that planning applications enhance the natural and local environment by recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.

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

Policy CC03 of the Managing Development Delivery Local Plan required development proposals to provide new or protect and enhance the Borough's Green Infrastructure networks, including the need to mitigate potential impacts of new development. The Countryside is identified as one of the Borough's Green Infrastructure networks.

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

The Borough Design Guide Supplementary Planning Document provides further guidance for developers with general guidance that development should respond positively to its site and local context (G1) and respond positively to the local character of the area (G2).

Policy RD8 of the Wokingham Borough Design Guide (2012) states that *“Areas of hard-standing should be kept to a minimum and should be appropriate to a rural setting, for instance gravel or strips of brick paving, rather than large areas of concrete block paving. Surfaces must allow surface water to percolate into the ground.”*

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

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

Site Context:

The application site is wholly within the landscape character area (LCA) I1 known as ‘Ashridge Farmed Clay Lowland’.

The valuable landscape characteristics of the LCA include;

- ***Characteristic mature in-field and roadside oaks*** in the open arable fields which provide a sense of place.
- ***Wooded skyline*** which provides a backdrop to the surrounding areas.
- ***Strong rural character*** of the rolling agricultural landscape with its subtle wooded ridges, large woodlands and sparse settlement which create a strong sense of place.
- ***Remote quality*** due to the scarcity of settlement and relative inaccessibility by footpath which results in a sense of tranquillity despite proximity to urban centres and motorways.
- ***Distant framed views*** over the surrounding landscape, including to Wokingham town and wooded horizons outside the borough which provides a sense of place and orientation.

The Landscape Strategy is to conserve and enhance the existing rural character. The key aspects to be conserved and actively managed are the characteristic wooded ridges and woodland, including ancient woodland. In particular, there are opportunities to restore coppice management and reinstate and repair key hedgerows with hedgerow standards.

In terms of development, the aim is to conserve the sparse settlement pattern through controlling development. This is supported by ‘A Design Guide For Hurst’ (2005) which states, within one of the objectives, that *“It is important that the rural aspects of the area are preserved”* (page 7).

Assessment:

‘Character’ encompasses a multitude of facets considered to be and not just physical/ visual character, but characteristics such as tranquillity. Part of an area’s character can be traits that are not tangible. Character goes beyond appearance and the two are distinct. The NPPF in paragraph 187 states that planning decisions

should 'contribute to and enhance the natural and local environment by...recognising the intrinsic character and beauty of the countryside...'

Keeping of Goats (Agriculture):

This use raises no character concerns as agricultural uses are appropriate in the Countryside. The feed store building is modest in scale and replicates the footprint of the original potting shed, causing no further harm to the prevailing character of the area.

Builders Contractors Storage:

The proposals would appear to involve the retention/creation of large areas of hardstanding to facilitate the storage proposed. Whilst this material choice is not generally supported in a rural area, harm in visual terms needs to be identified. The site lacks prominent visibility when viewed from the street (Pound Lane). This is owing to the site being sited towards the end of a private single track road and enclosed by the farmyard to the immediate north as opposed to being in a prominent and open position within the countryside landscape.

Therefore, whilst the hardstanding has and would continue to inevitably change the physical character and appearance of the site compared to what was there previously (undeveloped grassed field), the loss of the grassland and replacement with the hardstanding is not considered so substantially detrimental to the wider character of the countryside area in visual impact terms.

The storage building proposed is of similar scale to the feed/storage building associated with the keeping of Goats, whilst also being of similar scale to the recently demolished building it adopts the footprint of (seen below). Notwithstanding this, the cumulative impact of both the hardstanding and the new building would undoubtedly cause harm to the site's intrinsic rural character and verdant rural surroundings.



Google Earth Streetview Image (May 2019)

Turning away from the physical and visual impact of the development, the proposal seeks to introduce commercial storage use to this rural area by way of the change of use. Aside from the proposal not being accepted in principle as discussed earlier in the report, the open, active use and presence of non-agricultural vehicles, equipment and materials contributes further to the diminished rural quality of the wider surrounding area and would disturb the tranquillity of the surrounding Countryside. Landscaping provision on the eastern 'frontage' of the site is noted but cannot be relied on in perpetuity to mitigate the impact of a development that is harmful to the surrounding environment.

Elevational details for the vehicle gates have not been provided but their design should reflect the site's rural setting, ideally with traditional timber 3-bar fence gates.

Overall, the proposal is considered to have a materially harmful effect the area's character through disturbing the countryside's tranquillity. The increase in development and commercial activity in this sensitive rural setting is also directly contrary to the development aim of the LCA which is to conserve the sparse settlement pattern. The proposal would therefore conflict with the NPPF as it fails to enhance the beauty of the countryside, as well as policy CP3 of the Core Strategy and TB21 of the MDD.

Neighbour Amenity:

Loss of Light, Overlooking and Overbearing:

The nearest residential property to the application site is located 55 metres to the south. There are therefore no concerns on these grounds.

Noise:

It is unlikely that a storage use in this location would generate any adverse noise impacts on surrounding properties as its very nature involves the storing stationary equipment for extended periods of time. However, vehicle movements and the loading/unloading of them would be appreciative from surrounding properties and the impact of them must be addressed.

Therefore, details on the number of movements expected, the vehicles used and the operating hours of the use will need to be outlined in any future submission in order to fully assess the impact on these grounds. It may be that a Noise Impact Assessment will be required.

Highway Access and Parking Provision:

General

While the proposed change of use and sheds are unlikely to have significant impacts on the wider highway network, the scale of the proposed site/use is not specified in this consultation, which shall be clarified by the applicant in the formal submission.

Access

The site will retain the existing access via the private drive section of Pound Lane.

The applicant shall clarify the largest dimensions of vehicles (hereafter 'largest vehicle proposed') that will utilise this access. Subject to the proposed type(s) of vehicles, the recommended maximum width of dropped crossing by the Traffic Management team is 3.6m.

If modification of access will be required to facilitate manoeuvring, separate consent will be required from the TM team for the proposed width and location of the new dropped crossing.

Manoeuvring

The applicant will be required to submit the swept path analysis with the largest vehicle proposed at (i) the proposed site gate; and (ii) the existing junction connecting with the public highway, to demonstrate sufficient turning area will be provided for vehicle to enter and leave the driveway in forward gear.

Arboricultural Matters:

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

Several tall, mature and visually prominent trees line the northern boundary with the adjacent farmyard. The hardstanding, access track and proposed gates are all within close proximity to them.

An Arboricultural Impact Assessment in accordance with BS5837:2012 will therefore be required with any future planning application. A Landscape Proposals Plan and an Arboricultural Method Statement will also be required at condition but in this case, should be provided with the planning application for expediency and to illustrate efforts to provide suitable replacement planting.

Ecology:

Policy TB23 of the MDD Local Plan requires the incorporation of new biodiversity features, buffers between habitats and species of importance and integration with the wider green infrastructure network.

The site is located within a Bat Roost Suitability Habitat and also within a Red Risk Zone for Great Crested Newts.

There is a risk that the proposal could affect protected species and priority habitats and an ecological appraisal (comprising an extended Phase 1 Habitat and Species Scoping Survey, and any phase 2 surveys) would need to be submitted with any application.

Surveys should be carried out by suitably experienced ecologists who are a member of a professional organisation such as the Chartered Institute of Ecology and Environmental Management and / or are licensed or accredited by Natural England to survey protected species. Some ecological surveys are seasonal and this should be factored into the project timeframe.

An Extended Phase 1 Habitat Survey is a standardised technique for environmental audit and involves classifying and if required mapping habitats on and adjacent to the application site. The survey is then 'extended' and any features or habitats that are likely to be of importance for notable or protected species, and or prove to be a constraint to development are investigated further and described.

If the surveys show that the site contains habitats suitable for protected species further surveys for species such as reptiles and bats may need to be carried out.

Paragraph 99 of the government Circular 06/05: Biodiversity and Geological Conservation - Statutory Obligations and Their Impact within the Planning System (this document has not been revoked by the National Planning Policy Framework) states that:

“It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision. The need to ensure ecological surveys are carried out should therefore only be left to coverage under planning conditions in exceptional circumstances, with the result that the surveys are carried out after planning permission has been granted.”

Biodiversity Net Gain:

Biodiversity Net Gain is mandatory for major and minor planning applications unless the development meets the exception criteria set out in [paragraph 17 of Schedule 7A of the Town and Country Planning Act 1990](#) the [Biodiversity Gain Requirements \(Exemptions\) Regulations 2024](#), and [The Environment Act 2021 \(Commencement No. 8 and Transitional Provisions\) Regulations 2024](#). In the event planning permission is granted, and the exceptions do not apply, paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990 grants permission subject to the condition “(the biodiversity gain condition)” and that development may not begin unless:

- a) a Biodiversity Gain Plan has been submitted to the planning authority, and
- b) the planning authority has approved the plan.

Flooding:

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

The site and access thereto is located within Flood Zone 1 and the proposal represents no additional flood risk or vulnerability. It is therefore acceptable in terms of Policy CC09.

Drainage:

Policy CC10 of the MDD Local Plan requires sustainable drainage methods and the minimisation of surface water flow. A drainage plan should be submitted with a planning application.

Contamination:

There is no known contamination.

Summary/Planning Balance

It has been identified that the development has harmful impacts; firstly, the storage use proposed is contrary to the development plan as a whole and is unacceptable in principle. It has a detrimental impact on the character of the area due to the encroachment away from original buildings and results in harm to the Countryside and the surrounding landscape character. As such, there are clear negative impacts of the scheme.

The economic benefits of such a use are recognised, however the overall weight is limited due to the scale of the proposal. Weighing against the proposal is the inconsistent nature of the use in its countryside location and environmental harm identified above.

In light of the above it is unlikely that the proposed storage use would receive Officer support in a future application.

Submitting a Planning Application

Once you are ready to apply, please submit an application through the [Planning Portal](#). Specific documents are set out in the appendices below but refer to the Local Validation List available on the council's [how to apply for planning permission page](#) to assist you with ensuring the plans and documents submitted meet our validation requirements.

Other Guidance

Your development may also require Building Regulation approval to ensure it is built to national safety, design, and environmental standards. The Council's Local Authority Building Control (LABC) service offers a full range of plan approval, inspection, and associated services through an ISO9001 nationally accredited team of qualified building surveyors. These surveyors work closely with the Council's planning department to ensure the appropriate construction of your build. To find out

more visit the Council's [Building Control website](#) or call 0300 790 0580 to speak to a member of the team.

If your project requires a dropped kerb on the road in front of your house then you may require consent from the highway authority; further information is available on the Council's [dropped kerbs page](#). Finally, if your project includes 100 sqm or more of new floor area then it is liable for the community infrastructure levy. Refer to the Council's [CIL page](#) for more information.

This concludes the pre-application process and I trust that this informal advice is of use to you. Please be aware that it is given without prejudice to any future decision that the Council may take. If you would like further advice, then a new pre-application submission and associated fee will be required.

Yours sincerely,

Kieran Neumann

Planning Officer

Authorised by:



Appendix One – Relevant Policies and Guidance

The relevant policies associated with this proposal are as follows:

National Policy Core Strategy 2010 (CS)	National Planning Policy Framework (NPPF) National Planning Policy Guidance (NPPG) CP1 – Sustainable Development CP3 – General Principles for Development CP4 – Infrastructure Requirements CP6 – Managing Travel Demand CP7 – Biodiversity CP9 – Scale and Location of Development Proposals CP11 – Proposals Outside Development Limits
Managing Development Delivery Local Plan 2014 (MDD Local Plan)	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 TB21 – Landscape Character TB23 – Biodiversity and Development
Other	Borough Design Guide Supplementary Planning Document CIL Guidance + 123 List A Design for Hurst

Appendix Two – Validation Requirements

The documents required for validating any future planning application are as follows:

- – required document
- – possibly required document: these may either help determine an application or resolve the need to use a pre-commencement condition

Please note supporting information with regards to what details are required for each document are contained on the following page on the Council's website: [how to apply for planning permission page](#).

Standard Documents

Application form	●
Location Plan (1:1250) and Block Plan (1:500)	●
All plans to metric scale and to show existing and proposed	●
- Floor Plans	
- Elevation Plans	
- Roof Plans	
- Site Layout Plan	
Correct fee (where one is necessary)	●
CIL Form 0	●

Additional Documents

Biodiversity survey and report	●
Design and Access Statement	●
Flood Risk Assessment	●
Tree Survey / Arboricultural Statement	●
Water Course / Drainage Statement	●
Employment Skills Plan	○
Affordable Housing Statement	○
Land Contamination	○

Appendix Three – Legal Agreements and Community Infrastructure Levy

If your development requires a legal agreement pursuant to section 106 of the Town and Country Planning Act, this will need to be signed and completed prior to determination of any application. Preparing and completing an agreement will be carried out by the Council's legal department and is subject to a separate charge and Land Registry fee.

The CIL charge rate is calculated on the net additional floor space at £365 per square metre. Some exemptions may apply and it is advised to look at the Council's [community infrastructure levy advice page](#). A CIL form is required to make your application valid.