

DELEGATED OFFICER REPORT



WOKINGHAM
BOROUGH COUNCIL

Application Number:	242418
Site Address:	Cousins House, 1-3 Reading Road, Finchampstead, Wokingham, RG27 0RP
Expiry Date:	28 May 2025
Site Visit Date:	4 June 2024
Proposal: Full application for a change of use from offices (Use Class E(g(i))) to a Patient Transport Service building (Use Class Sui Generis), along with the extension of the existing car park to provide an additional 5No. parking spaces. (part retrospective)	

PLANNING CONSTRAINTS/STATUS

Countryside
Contaminated Land Consultation Zone
Green Routes and Riverside Paths
Bat Roost Habitat Suitability
Scale and Location of Development Proposals
Landscape Character Assessment Area
Main Rivers DRN Consultation Zone
Ordinary Watercourses Consultation Zone
Local Wildlife Sites Consultation Zone
Archaeological Sites
Flood Zones 2 & 3

PLANNING POLICY

National Policy	National Planning Policy Framework (NPPF) National Planning Policy Guidance (NPPG)
Core Strategy (CS)	CP1 – Sustainable Development CP3 – General Principles for Development CP6 – Managing Travel Demand CP7 – Biodiversity CP9 – Scale and Location of Development Proposals CP11 – Proposals Outside Development Limits
MDD Local Plan (MDD)	CC01 – Presumption in Favour of Sustainable Development CC02 – Development Limits CC03 – Green Infrastructure, Trees and Landscaping CC04 – Sustainable Design and Construction CC06 – Noise CC07 – Parking CC09 – Development and Flood Risk CC10 – Sustainable Drainage TB06 – Development of Private Residential Gardens TB21 – Landscape Character

	TB23 – Biodiversity and Development TB25 – Archaeology
Joint Minerals and Waste Plan (JMWP)	DM1 - Sustainable Development
Other	Borough Design Guide Supplementary Planning Document

PLANNING HISTORY

Application No.	Description	Decision & Date
O/1996/64043/ O	Erection of 13 Dwellings	Approved
RM/1999/68978	Reserved Matters for the Erection of 13 Dwellings.	Approved: 21 May 1999
F/1999/69163	Proposed Demolition Of Existing Buildings And Erection Of 22 Dwellings With Roads And Services	Refused: 30 April 1999
F/1999/69162	Proposed Demolition Of Existing Buildings And Erection Of 18 Dwellings With Roads And Services	Refused: 30 April 1999
F/2007/2672	Proposed first floor rear extension.	Approval: 02 January 2008
F/2008/0928	Proposed first floor side/rear extension to existing offices.	Approved: 04 June 2008
F/2013/0031	Application for the extension of the car park at Masdar House. (Retrospective)	Approved: 27 February 2013
170615	Full planning application for the change of use from B1 (a) to C3 residential, comprising 3x1 bed apartments and 4x2 bed apartments on the existing office building.	Withdrawn: February 2019
240893	Full application for the change of use from an area of grassland to create additional hardstanding parking spaces and access for vehicles.	Refused: June 2024

CONSULTATION RESPONSES

Internal

WBC Environmental Health – No comments
WBC Highways – Request further information
WBC Landscape and Trees – Objection raised
WBC Ecology – No comments
WBC Emergency Planning – No objection
WBC CIL – No comments

External

Natural England – No comments
The Environment Agency – Objection raised
Berkshire Archaeology – No comments
AWE Burghfield – No comments

REPRESENTATIONS

Finchampstead Parish Council	Objection raised on the following grounds: - Flooding issues
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	- Impact on neighbouring amenities - Impact of parking
Ward Member(s)	No comments received
Neighbours	4 letters received raising concerns on the following grounds: - Flood risk - Character of the area - Neighbouring amenities - Traffic congestion - Highway safety

APPRAISAL

Context: The application site comprises an office building which was previously a residential dwelling.

There is a large area of hardstanding to the rear of the building, with an area of lawn beyond. The site backs onto Blackwater River.

This application seeks planning permission for the extension of hardstanding to the rear of the site, which would facilitate the change of use of the building from its lawful office use, to a Patient Transport Service use, which falls within the Sui Generis use class. The change of use aspect of the proposal is retrospective, with the business operating from the premises since July 2023.

The current application follows the refusal of application 240893 in June 2024. The previous scheme comprised the extension of the hardstanding, as currently proposed, however, it did not include the change of use that is now seeking regularisation. The resubmission includes the change of use element of the proposal as it was discovered through a separate investigation that the business was operating unlawfully. The previous application was refused for the following reasons:

1. The proposed development constitutes an unacceptable and unsustainable form of development in an unsustainable location and introduces new hardstanding in a rural location outside any defined settlement boundary for which no justification exists and which fails to maintain the quality of the environment and is detrimental to the character and appearance of the countryside. The proposal is contrary to Core Strategy policies CP1, CP3 and CP11, MDD Local Plan Policies CC01, CC02 and the National Planning Policy Framework.

2. The hardstanding and associated parking of vehicles would expand development away from existing development and would encroach into and harm the countryside. The introduction of hardstanding would result in a permanent and solid feature in the landscape and represent an unacceptable encroachment of built development into the countryside. This neither protects the separate identity of settlements, nor maintains the quality of the Blackwater Valley Landscape Character Area. The proposal is contrary to Section 15 of the NPPF, Core Strategy Policies CP1, CP3 & CP11 and MDD Local Plan Policy TB21.
3. The application site lies within Flood Zone 2 & 3, adjacent to the River Blackwater, and insufficient information has been provided to satisfy the Authority that the development would not lead to an unacceptable impact on flood risk. It has not been demonstrated by any exceptional circumstance, through a Flood Risk Assessment or any other material consideration, that the proposed development is appropriate within Flood Zones 2 & 3, contrary to the NPPF and Policy CC09 of the MDD Local Plan.
4. In the absence of an arboricultural survey, the Local Planning Authority is not satisfied that there will not be an unacceptable impact on existing trees and vegetation, the loss of which would be detrimental to the character of the area and contrary to: The National Planning Policy Framework, Core Strategy Policies CP1 and CP3 and MDD Local Plan Policy CC03.

Principle of Development: 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.

The site is located in the countryside and therefore must be assessed against policy CP11. This policy states that proposals outside of development limits will not normally be permitted except where:

- 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.

The principle of development for the extension of the existing hardstanding was already deemed unacceptable within the appraisal of application 240893. Nothing contained within this current application addresses this conclusion and thus remains an objection of the proposal.

With regard to the proposed change of use, for this to be considered compliant with exception 1 of policy CP11, the current use of the building would have to be associated with, and necessary to, a rural enterprise. There is no definition of that which constitutes a rural enterprise, however, with the limited information provided as part of the application, there is significant doubt as to any intrinsic link between the business and the countryside.

Furthermore, whilst the change of use does not constitute excessive encroachment itself, the scale and nature of the business operation is one that requires significant parking provision and storage of cars and other larger patient vehicles, which has led to the expansion and urbanisation of a modest countryside site.

It is acknowledged that the change of use would partly comply with exception 3 of the CP11, in that it would operate partly within an existing building which is appropriate for conversion. Nonetheless, the wording of Policy CP11 requires compliance with all three of the requirements listed above for development to be supported in principle. As the development fails to comply with the first and second requirement of CP11, the change of use is unacceptable in principle.

Accordingly, the principle of development for both the extension of the hardstanding and the change of use is unacceptable. This must be weighed against any benefits and against any harm. This will be assessed throughout the report, with a summary of this matter provided in the conclusion.

Notwithstanding the above, acknowledgement is given to criteria 6 of CP11, which states that development may be permitted if it constitutes an essential community facility. Paragraph 4.17 of the Core Strategy provides further detail as to the definition of a community facility, stating "*Community facilities include development for health (including preventative social care and community support services), education, play and leisure or culture together with libraries, village/community halls and religious buildings*". It is possible that the Patient Transport Service currently operating from the site is akin to development for health, thus constituting a community facility. That said, with the limited information provided as part of this submission, the LPA cannot make a definitive conclusion on these grounds. In any case, it would be reasonable for this type of development to be located elsewhere in a more urban location and the test of "essential" in CP11 would also need to be assessed.

Character of the Area: Policy CP1 of the Core Strategy seeks to maintain or enhance the high quality of the environment and CP11 states that proposals outside of development limits will not normally be permitted, except where, inter alia, it does not

lead to excessive encroachment or expansion of development away from the original buildings.

Policy CP3 requires development to be 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. It continues that development should have no detrimental impact upon important landscape features.

Further to the in-principle objections of the previous application (ref: 240893), reasons for refusal 1 & 2 also included reference to the impact of the extended hardstanding on the landscape character of the area, with this harm being detailed in the associated Officer Report. There appears to be little note of this from the applicant within the current application, despite the proposal being identical with regard to the physical development proposed. As such, the same concerns remain, as set out in further detail below.

The increased hardstanding proposed would be highly visible from various public vantagepoints, due to its prominent location on the road junction, bridge and also the Blackwater River to the rear of the site. Once viewpoint from Reading Road has been shown in the photo below.



The proposed hardstanding is located in a position which expands development further away from the original building of Cousins House and, as such, it would encroach away from existing built form and harm the undeveloped countryside. The area of hardstanding is some distance from the property - approximately 25 metres between the two components of site.

The introduction of hardstanding and use of the land for the parking of vehicles, in association with the Patient Transport Service use seeking permission, would result in a permanent and solid feature in the landscape and represent an unacceptable encroachment of built development into the countryside.

Policy TB21 of the MDD Local Plan relates to Landscape Character. It requires proposals to 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. It states that proposals shall retain or enhance the condition, character and features that contribute to the landscape.

The site is located in Landscape Character Area A3: Blackwater River Valley. A key characteristic is the valley landscape dominated by the River Blackwater which is located approximately 10m from the site. The alluvial nature of the area contributes to the character of the area.

The valued attributes of this LCA include the riverine character and the distinctive intact floodplain. Continuing pressure for expansion and infill development within and outside existing settlements is leading to loss of features such as trees, woodlands and historic features and its impacts on the rural and remote character of the area is a key issue affecting this LCA. The proposed development directly impacts on this. The LCA seeks to conserve the scenic quality and natural character of the river corridor.

The application form states there are no trees or hedges on land adjacent to/on the proposed development site that could influence the development or might be important as part of the local landscape character. The Landscape & Trees Officer has reviewed the submitted scheme and argues against this claim. There are trees and hedges which bound 3 sides of the carpark, some of which will need to be removed to facilitate the new surface. They are part of and add to the publicly viewed amenity of the verdant and exceptional bridge and riverside location.

Reason for refusal 4 imposed on the previous application related to the lack of arboricultural information provided, such that it could not be demonstrated that appropriate mitigation could be implemented to protect the important landscape features discussed above. This has not been addressed as part of the current application. A landscaping statement has been provided, however, this is insufficient for the detail required. Laurel hedging is proposed, which is a non-native plant and so would not suit the Countryside location. Overall, the Trees & Landscape Officer is unable to support the scheme.

In line with the above, it is therefore concluded that the reasons for refusal relating to landscape character impacts have not been overcome. The application site is not an appropriate location for the development and would cause unacceptable harm to the character and appearance of the area. As a result, it conflicts with policies CP1 and CP3 of the Core Strategy and Policy TB21 of the Wokingham Borough Development Plan Adopted Managing Development Delivery Local Plan (2014) (the Local Plan). These policies, amongst other provisions, require development to maintain or enhance the features of the environment that contribute to the rural character. There is also conflict with Chapter 15 of the National Planning Policy Framework, which seek to protect or enhance the natural environment.

Neighbouring Amenity: The proposed development has raised concerns from neighbouring residents, primarily relating to flooding, highway issues, countryside impacts and noise.

Matters relating to countryside impact, flooding and highway issues have been addressed in separate sections of this report.

With regard to noise, Policy CC06 and Appendix 1 of the MDD Local Plan requires that development protect noise sensitive receptors from noise impact.

The current use of the site was an office and the proposed Sui Generis site comprises a 24/7 operation. The site is surrounded by residential development and further expansion of the existing car park for 24/7 operation is likely to lead to increased noise generation through additional traffic movements to and from the site and within the site itself as well as the movement of vehicles and people. The issue will be exacerbated by the lack of screening. The land uses are conflicting and the disturbance to neighbours is considered to be unacceptable with no mitigation proposed. The development is considered to detrimentally impact the quality of life of adjoining land occupiers. The proposed development is therefore contrary to CP1, CP2 CC06 and the NPPF.

Flooding and Drainage: The application site is located within Flood Zones 2 & 3 and involves the carrying out of works within 20 metres from a Main River. As such, a Flood Risk Assessment is a requirement of the application. This was not submitted as part of the previous application (ref: 240893) and thus formed a reason for refusal.

A document titled Flood Risk Assessment has been provided as part of this application, however, this appears to be an initial quote for the assessment, as opposed to a full assessment. Consequently, an objection has been raised from the Environment Agency (EA), on the basis that insufficient information has been submitted and it has not been demonstrated by any exceptional circumstance that the proposed development is appropriate within Flood Zones 2 & 3, contrary to the NPPF and Policy CC09 of the MDD Local Plan. As such, the previous reason for refusal imposed on application 240893 relating to flood risk has not been overcome.

Highway Access and Parking Provision: The Highways Officer has raised no objection as to highway safety impacts and states that the five additional parking spaces are unlikely to have significant impacts on the wider highway network. A request was made for a swept path analysis to demonstrate vehicles can enter and leave the driveway in forward gear, however, this is not considered expedient to pursue given the objections discussed above.

Conclusion: The proposed development in the form of the extended hardstanding and associated paraphernalia of the scale outlined in this application would have a cumulative and detrimental impact on this countryside location and the landscape character.

Further to the above, with the limited information provided as part of this application, it has not been adequately demonstrated that the change of use, which is unacceptable in principle, would constitute an essential community facility that cannot be accommodated with the settlement limits. There are limited benefits that would outweigh the harm identified.

Overall, any benefits associated with the development are significantly outweighed by the harm identified. The application is therefore recommended for refusal.

Community Infrastructure Levy (CIL): When planning permission is granted for a development that is CIL liable, the Council will issue a liability notice as soon as practicable after the day on which the planning permission first permits development. Completing the assumption of liability notice is a statutory requirement to be completed for all CIL liable applications.

The Public Sector Equality Duty (Equality Act 2010): In determining this application the Council is required to have due regard to its obligations under the Equality Act 2010. The key equalities protected characteristics include age, disability, gender, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief. There is no indication or evidence (including from consultation on the application) that persons with protected characteristics as identified by the Act have or will have different needs, experiences, issues and priorities in relation to this particular planning application and there would be no significant adverse impacts as a result of the development.

RECOMMENDATION	
Conditions agreed:	N/A
Recommendation:	Refuse and Enforce
Date:	27 May 2025
Earliest date for decision:	17 October 2024

Recommendation agreed by: (Authorised Officer)	
Date:	27 May 2025