

DELEGATED OFFICER REPORT



**WOKINGHAM
BOROUGH COUNCIL**

Application Number:	252297
Site Address:	26 Wargrave Road, Twyford, Wokingham, RG10 9PQ
Expiry Date:	4 December 2025
Site Visit Date:	10 November 2025
Proposal: Full application for the proposed erection of 1no self build dwelling with associated access and landscaping.	

PLANNING POLICY	
National Policy	National Planning Policy Framework (NPPF) National Planning Policy Guidance (NPPG)
Core Strategy (CS)	CP1 – Sustainable Development CP2 – Inclusive Communities CP3 – General Principles for Development CP4 – Infrastructure Requirements CP5 – Housing Mix, Density and Affordability CP6 – Managing Travel Demand CP7 – Biodiversity CP9 – Scale and Location of Development Proposals CP17 – Housing Delivery
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 TB05 – Housing Mix TB06 – Development of Private Residential Gardens TB07 – Internal Space Standards TB08 – Open Space, Sport and Recreational Facilities Standards TB21 – Landscape Character TB23 – Biodiversity and Development
Joint Minerals and Waste Plan (JMWP)	M2 – Safeguarding sand and gravel resources
Wokingham Borough Local	SS1 – Sustainable development principles SS2 – Spatial strategy and settlement hierarchy SS3 – Development within or adjacent to major and modest settlements SS10 – Meeting our housing needs

Plan Update (LPU)	CE1 – Design principles for efficient buildings CE3 – Environmental standards for residential development C1 – Active and sustainable transport and accessibility C2 – Mitigation of transport impacts and highway safety and design C3 – Active travel C5 – Parking and electric vehicle charging H1 – Housing mix, density and standards H6 – Self-build and custom build H12 – Residential development of existing private gardens FD1 – Development and flood risk (from all sources) FD2 – Sustainable drainage NE1 – Biodiversity and geodiversity NE2 – Biodiversity net gain NE4 – Trees, woodland, hedges and hedgerows NE5 – Landscape and design DH1 – Place making and quality design DH2 – Safeguarding amenity HC5 – Environmental protection HC8 – Noise pollution HC9 – Contaminated land and water
Other	Borough Design Guide Supplementary Planning Document CIL Guidance + 123 List Sustainable Design and Construction Supplementary Planning Document Twyford Neighbourhood Plan

PLANNING HISTORY

Application No.	Description	Decision & Date
162886	Full application for the proposed erection of 2no dwellings with associated parking and access.	Refused 15/12/16

CONSULTATION RESPONSES

Internal

WBC Environmental Health – No objection
WBC Drainage – Further information required
WBC Highways – No objection subject to conditions
WBC Landscape and Trees – No objection subject to conditions
WBC CIL – Development would be CIL liable as it results in residential accommodation
WBC Ecology Newts – No comment
WBC Ecology – Further information required
WBC Waste Services – No comments received

External

None consulted

REPRESENTATIONS

Parish/Town Council	Objection from Twyford Parish Council based on the following reasons: • Overdevelopment of the site. • The scale and massing of the proposed building on three sides to the boundary, would be out of keeping with the character and pattern of surrounding dwellings. • The proposal is contrary to the Twyford Design Code Officer comment: <i>The above will be considered in the 'Design/ Character of the Area' section of the report</i>
Ward Member(s)	No comments received
Neighbours	5 objections (excluding duplicates) have been received from members of the public which relate to the following matters: • Loss of residential amenity and land separating surrounding properties Officer comment: <i>As noted in the report, development in private residential gardens can be acceptable in principle, however this is subject to the proposal being compliant in other respects outlined in TB06 of the MDD</i> • Proximity to neighbouring dwellings Officer comment: <i>See neighbouring amenity section of the report</i> • Living spaces orientated towards 3 Hermitage Drive which will introduce more noise • Unacceptable loss of light to neighbouring properties Officer comment: <i>See neighbouring amenity section of the report</i> • Overdevelopment of the site • Cramped arrangement, with many windows facing boundary treatment • Incongruous with the current street scene Officer comment: <i>See Design/ Character of the Area section of the report</i> • The proposal is a self-build project for applicants who are existing residents of the area, so no reliance can be placed on this development delivering any wider social benefit Officer comment: <i>Weight attributed to benefits of the scheme are discussed in the 'Planning Balance' section of the report</i> • With both the entrance to the property being set back from the road and the dwelling effectively obscured

	from the street as situated behind 3 Hermitage Drive, there will be a high likelihood of confusion for deliveries and visitors Officer comment: <i>This is not a material planning consideration</i> • The proposed entrance to the property from Hermitage Drive is currently a turning head in the road, which is typically used as parking for up to 6 cars. Removal of this space will likely disburse these cars to neighbouring roads of Lincoln Gardens or Pine Grove, further impacting local residents • From a safety perspective, the proposed plans make no provisions for enhancements to the entrance to ensure a deterrent for cars trying to park in this area, or for this entrance effectively becoming a junction onto Hermitage Drive • The additional traffic movements proposed will add to congestion and the risk of conflict with pedestrians and cyclists • The access shown appears inadequate in terms of visibility and manoeuvring Officer comment: <i>The proposal has been robustly assessed by WBC Highways Officers. See Highways section of the report</i> • An entrance has already been built by the builder with the construction of two brick plinths and the erection of a fence adjoining one of the plinths. Also, this entrance way does not line up with the pathways already outside the site. Officer comment: <i>This is noted and observed on the site visit. The applicant will be reminded that development built outside of a planning application may be subject of enforcement action, unless it can be demonstrated that what has been constructed does not amount to development or qualifies as permitted development</i> • It will affect the view from garden patio of 1 Hermitage Drive • Will affect the resale value of surrounding properties Officer comment: <i>The above are not material planning considerations in the determination of a planning application</i> • Height of the dwelling is excessive and would likely pave the way for accommodation in the roof space Officer comment: <i>See commentary in the Design/ Character of the Area section of this report. Officers are only able to</i>
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	<i>assess the scheme as presented and not assume a future scenario.</i> - Plans do not clearly show how foul drainage will connect to the mains sewer system Officer comment: <i>See flooding and drainage section of the report.</i> A representation submitted by 2 neighbours also raised the following: - As a result of the application there would be a net reduction of parking surrounding the site as a result of the proposed access Officer comment: <i>See Highways section of the report</i> - Pleased the fence is to be retained Officer comment: <i>This is noted</i> - Hope that large vehicles delivering building supplies will be delivered via the Hermitage Drive side entrance Officer comment: <i>Due to the proposal being for a single dwelling, a Construction Method Statement has not been requested by WBC Highways. As such, the developer would be responsible for how deliveries would be made to the site and this not need to be approved by the LPA. However, should adverse impact be caused during the construction phase, this could be reported to the WBC Environmental Health team</i> - Hope that there will be a 1m distance between the proposed dwelling and the boundary Officer comment: <i>The plans submitted can be measured. A 1m gap to the boundaries is not consistently proposed</i> - Do not think proposal will adversely affect daylight to no 26 or 61 Lincoln Gardens Officer comment: <i>This is noted</i> - Is the proposed skylight necessary? Would object to any further development in the roof space Officer comment: <i>Owing to the skylight's position in the roof space, it is not considered these would adversely impact the privacy of neighbours. As mentioned above, Officers are required to assess the scheme as presented and not assume a future scenario regarding any conversion of loft space</i>
APPRAISAL	
Site Description: The application site relates to part of the former residential garden of 26 Wargrave	

Road, Twyford that measures a depth of approx. 35m. The garden of 26 Wargrave Road has been sub-divided and the plot subject of this application has been severed off by fencing.

The plot has boundaries along Hermitage Drive and Lincoln Gardens. Properties in the vicinity (in Lincoln Gardens) are detached and are of a fairly uniform 1970s style with a marginal variation in the established building line with properties stepping back when travelling east to west. Properties on Hermitage Drive are a mixture of two storey and bungalows with a generally consistent building line.

Proposal:

Planning permission is sought for the erection of one detached bungalow in the rear garden of 26 Wargrave Road. The dwelling would measure approximately 6m in height, 12.7m in width and 10.6m in depth. The dwelling would be accessed from Hermitage Drive through opening through a stud of highway land. The dwelling would be in a tandem arrangement with 26 Wargrave Road, albeit it would have its own, separate access, which is not reliant on 26 Wargrave Road. The applicant has stated that the dwelling would be a self-build development.

This application submission follows on from a refused application under reference number 162886 for two dwellings. The refused site plan, and the proposed site plan are below:



Left: Proposed block for refused application 162886. Right: Proposed block plan under this current application

Application 162886 was refused for the following reasons:

Conditions and Reasons

1. By virtue of its inappropriate layout unreflective of Hermitage Drive and Lincoln Gardens and narrow design of the dwellings the proposed development would appear incongruous within the street scene and would harmfully detract from the existing character of the area. The proposed dwellings would appear cramped within the site and would fail to integrate with the local area contrary to the NPPF, Policies CP1 and CP3 of the Core Strategy, Policies TB06 and TB21 of the MDD Local Plan and the guidance within the Borough design Guide SPD.
2. The proposed development would represent overdevelopment on a site which is not an appropriate infill plot due to its siting behind the established building line of Hermitage Drive. The proposed development would result in the loss of open space and a number of mature trees which currently provide a visual break from the built form in the locality, contrary to the NPPF, Policies CP1 and CP3 of the Core Strategy, Policies CC03, TB06 and TB21 of the MDD Local Plan and the guidance of the Borough Design Guide.
3. The proposed development would fail to provide adequate useable amenity areas for the two proposed dwellings. The amenity for proposed plot 2 especially would be overshadowed by mature trees and would not be useable, ultimately detrimentally impacting the amenity of future occupiers of the proposed dwellings. The proposal is considered to be contrary to the NPPF, Policies CP1 and CP3 of the Core Strategy, Policy TB06 of the MDD Local Plan and the guidance of the Borough Design Guide SPD.

Whilst this previously refused application is of importance, the scheme is materially different in that it now proposes one dwelling in a revised location.

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 within settlement limits and in the major development location of Twyford, as defined in Policy CP9 of the Core Strategy. As the site is within settlement, it represents a sustainable location for residential development and residents would have good access to facilities, amenities and means of public transport.

The proposal relates to development of a private residential garden. The NPPF clarifies that residential gardens in built up areas are not previously developed land (brownfield land) This would be the case here as the site is within a built-up area. Officers consider that despite the land in question being severed off from the remainder of garden space for 26 Wargrave Road, the use of the land is still residential as an intervening or new lawful use has not been established.

Whilst policy CP3 of the Core Strategy states that proposals should “*not lead to a net loss of dwellings and other residential accommodation and land*”, the existence of policy TB06 of the MDD does allow an exception and development of private residential gardens, subject to complying with strict criteria. Criteria 2 of the policy focuses on new residential development within private residential gardens. The proposal should make a positive contribution to the character of the area in terms of:

- i. *The relationship of the existing built form and spaces around buildings within the surrounding area;*

- ii. *A layout which integrates with the surrounding area with regard to the built up coverage of each plot, building line(s), rhythm of plot frontages, parking areas, and*
- iii. *Existing pattern of openings and boundary treatments on the site frontage*
- iv. *Providing appropriate hard and soft landscaping, particularly at site boundaries.*
- v. *Compatibility with the general building height within the surrounding area*
- vi. *The materials and elevational detail are of high quality, and where appropriate distinctive and/ or complementary*

b) The application site provides a site of adequate size and dimensions to accommodate the development proposed in terms of the setting and spacing around buildings, amenity space, landscaping and space for access roads and parking

c) The proposal includes access, which meets appropriate highway standards

d) The proposal does not lead to unacceptable tandem development

e) The design and layout minimises exposure of existing private boundaries to public areas and avoids the need for additional physical security measures.

A number of the above criteria also relate to other material considerations.

Compliance with TB06 will need to be demonstrated and will be discussed/ assessed further in this report as a number of the above points interrelate with other material planning considerations.

Neighbourhood Plan

The neighbourhood development plan relevant to this proposal is the Twyford Neighbourhood Plan that was adopted in July 2023. The Neighbourhood Plan contains policies that relate to a number of material considerations, although no specific policy for development within existing residential gardens.

Joint Minerals and Waste Plan

The site is located in an area where geological data suggests there are potential sand and gravel reserves. The Central and Eastern Berkshire Joint Minerals and Waste Plan (Joint Plan) was adopted by Wokingham Borough Council on 19 January 2023.

The Joint Plan identifies site allocations and extensions to help provide a future supply of sand and gravel extraction. However, despite these allocations, there remains a shortfall of supply during the plan period. The policy response to address the shortfall is the identification of a 'Minerals Safeguarding Area' (MSA), where Policy M2 of the plan applies, and also an 'Area of Search' where Policy M4 applies. This approach is to demonstrate the potential for, in effect, windfall provision within the Plan area.

The site is located within the MSA. Policy M2 of the Joint Plan would therefore be relevant to the proposal. Policy M2 seeks to protect mineral resources against unnecessary sterilisation by non-minerals development. For this purpose, a 3ha threshold is reflected in the supporting text to Policy M2 – which states at paragraph 6.40: *“a minimum plot size of 3 hectares will apply in the safeguarding process to avoid*

repeated consideration of prior extraction where this can be assumed to be uneconomic due to the small size of the parcels of land involved.”

The site relates to a plot area of less than 3 ha and so is below this size threshold and therefore it is not considered commercially viable or suitable for prior extraction and removal.

Emerging Policy - Local Plan Update

The Local Plan Update (LPU), the plan which will supersede the adopted Core Strategy and MDD local plans, is at Regulation 22 stage as it has been submitted to the Planning Inspectorate for examination. As per paragraph 49 of the NPPF:

Local planning authorities may give weight to relevant policies in emerging plans according to:

- a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);*
- b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and*
- c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given)*

As a whole, the LPU is still given limited weight, despite its advance stage of preparation. This is owing to unresolved objections to a great number of the policies contained within it. However, those policies highlighted in **yellow** in the policy table earlier in this report are those that have received less objection and therefore are considered by Officers to individually hold moderate weight in the determination of this application. All the others hold limited weight. The policies that hold moderate weight will feed into/ be considered in their relevant sections in this report.

Housing Land supply

The borough currently does not have a 5 year housing land supply. Recent data shows the borough having a 2.5 year housing land supply as a result of previous over-delivery, rather than current under-delivery. Nevertheless, as a result of the shortfall, the borough's policies are 'out of date' in accordance with paragraph 11(d) of the NPPF (2024). Therefore, permission for development should be granted *“unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination”* (paragraph 11 d(ii) of the NPPF, 2024).

Turning to paragraph 14 of the NPPF, it outlines situations where the presumption (at paragraph 11d) applies to applications involving the provision of housing, in locations where there is an adopted neighbourhood plan.

Para 14 states that where para 11(d) applies, the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits, provided the following apply:

a) the neighbourhood plan became part of the development plan five years or less before the date on which the decision is made; and

b) the neighbourhood plan contains policies and allocations to meet its identified housing requirement (see paragraphs 69-70).

Whilst the neighbourhood plan became part of the development plan less than 5 years ago, the plan does not contain policies and allocations to meet its identified housing requirement. As such, the neighbourhood plan does not comply with (a) and (b) above and so para 14 of the NPPF is not engaged.

Summary on principle of development

The NPPF warrants positive consideration of 'self-build' proposals subject to demonstrating compliance with other planning policies in respect of design, character, residential amenity etc. As such, the principle of this proposal for one additional 'self-build' dwelling development is accepted in this major development location. However, this is on the provision that the proposal complies with policy TB06 of the MDD which outlines the criteria for suitable residential development in private residential gardens and that it meets other material considerations, as outlined below.

Dwelling Mix/Tenure:

Policy CP5 of the Core Strategy states that planning permission will be granted for residential development providing a mix and balance of densities, dwelling types, tenures and sizes.

As this proposal is for a single residential unit, excessive commentary on tenure and dwelling mix is not applicable in this instance. The proposal would see the erection of a 3 bedroom bungalow dwelling which supports the provision of family housing within the borough. It would also contribute to the variety of housing stock as it is a bungalow.

Design/ Character of the Area:

Policy CP3 of the Core Strategy states that development must be appropriate in terms of its scale of activity, mass, layout, built form, height, materials and character to the area in which it is located and must be of high-quality design without detriment to the amenities of adjoining land uses and occupiers. Paragraph 131 of the NPPF (2021) notes that good design is a key aspect of sustainable development.

R9 of the Borough Design Guide states that development should respond to the height of the surrounding local context, and R10 states that development should be reflective of local density. R11 states housing should be designed to create a street scene with a coherent character that relates well to the existing street scene.

Policy TB06 of the MDD states that new dwellings in residential gardens should:

- i. The relationship of the existing built form and spaces around buildings within the surrounding area;*

- ii. *A layout which integrates with the surrounding area with regard to the built up coverage of each plot, building line(s), rhythm of plot frontages, parking areas, and*
- iii. *Existing pattern of openings and boundary treatments on the site frontage*
- iv. *Providing appropriate hard and soft landscaping, particularly at site boundaries.*
- v. *Compatibility with the general building height within the surrounding area*
- vi. *The materials and elevational detail are of high quality, and where appropriate distinctive and/ or complementary*

b) The application site provides a site of adequate size and dimensions to accommodate the development proposed in terms of the setting and spacing around buildings, amenity space, landscaping and space for access roads and parking

c) The proposal includes access, which meets appropriate highway standards

d) The proposal does not lead to unacceptable tandem development

e) The design and layout minimises exposure of existing private boundaries to public areas and avoids the need for additional physical security measures.

Finally, policy TW13 of the Twyford Neighbourhood Plan focuses on good quality design and how this should positively respond to the character of the area. The Twyford Neighbourhood Plan sets out principles in the Twyford Design Guidelines and Codes Report. The Guidelines and Codes makes clear that the character and identity of Twyford is not defined by one style and Twyford is broken down into several character areas. The relevant character area in this case is 'North of the Village'. In this area, it states there is a variety of development, roof forms and boundary treatment. Dwellings are generally 1-2.5 storeys.

Scale, Massing and Detailed Design

The proposed dwelling would be single storey. Within the surrounding area (Hermitage Drive) there are a mix of two storey, chalet bungalows and bungalows. On Lincoln Gardens, dwellings are two storey and less varied. However, given the proposed dwelling would be read in the context of both Hermitage Drive and Lincoln Gardens, a proposed single storey dwelling would not be out of keeping as a whole in relation to the general surrounding area as a whole, owing to the diversity on Hermitage Drive.

The height of the proposed dwelling would be approximately 6m, it would still be considerable and still would be highly visible, particularly in Lincoln Gardens over the fence line that has been installed, which appears to be without planning permission. In terms of width, the dwelling would measure in excess of 12m which is greater than those in the vicinity.

Moreover, the proposed dwelling would be markedly different from all other dwellings in the surrounding area, in that three of its four external boundary walls would be under, or just at a 1m distance from their respective property boundaries. This would result in the proposed dwelling having a cramped appearance in the context of the application site and neighbouring properties and would not leave any room for any meaningful setting around the dwelling.

In terms of detailed design, materials have not been disclosed but would have to be reflective of both the Hermitage Drive and Lincoln Gardens if a suitable design could be achieved. The use of pitched gables is reflective of the roof forms of dwellings on Lincoln Gardens but the overall hipped roof can be found on Hermitage Drive which appears acceptable in principle.

Layout and impact on the street scene

Owing to the siting of the proposed dwelling, it would not front face either Hermitage Drive or Lincoln Gardens. However, the development would still be visible within both street scenes. From Hermitage Drive, the dwelling, owing to its height, would still be visible across the side garden of 3 Hermitage Drive along with the entrance to the site. On Lincoln Gardens, the entire maximum depth of the dwelling would be visible as it would be set further forward than an existing dwellings on this road.

Hermitage Drive is characterised by detached and semi-detached dwellings which are primarily two storey on the eastern side (that of the application site) and chalet bungalows on the western side. The building line is relatively consistent.

On Lincoln Gardens, properties are detached and of a 1970s design. The building line on the south-western side of the road (that which the dwelling would be close to) has minor degrees of variation owing to dwellings being slightly set back from one another at points.

There are examples of 'backland' development, notably 26 Wargrave Road and 24A Lincoln Gardens. Both of these sites have minimal visibility within the street scenes of Lincoln Gardens, Hermitage Drive and Thornbury Green. In this case, the proposed dwelling would be entirely visible from Lincoln Gardens (entirety of the side elevation). Until relatively recently, the end of the gardens was a bush/ hedge which provided a welcomed verdant end to the residential development. Upon the site visit carried out it could be seen that this had been removed and replaced with a close boarded timber fence with concrete posts, which is proposed to be reduced so that a hedge will once again form the boundary line for the extent of the dwelling.

However, the removal of the hedge and replacement with a fence has resulted in a degrading of the quality of the surrounding area in terms of the removal of natural landscaping.

The dwelling would fail to integrate with the Lincoln Gardens street scene and would represent an incongruous and domineering development at a prominent end point of this residential road. The height of the dwelling would still be considerable and the extent of the side elevation at the end of this cul-de-sac would still be excessive. It would fail to respect the building line of properties on Lincoln Gardens too, being substantially further forward than the immediate neighbour. Whilst some staggers in the building line are noted, none were to this degree and prominence. Due to the constraints and size of the plot, there is no scope to bring the dwelling more into line with those on Lincoln Gardens.

In respect of Hermitage Drive, the dwelling would have more limited direct visibility. Facing the site most visible would be the parking area. Travelling from the east, some views of the dwelling would be noticeable.

Whilst it is appreciated other dwellings in the vicinity have driveways facing the road, there are also views of built form alongside this. In this case, it will appear a blank and disjointed addition to the street scene with the dwelling itself having no relationship. Furthermore, the presence of front/ side gardens as primary amenity space is not found elsewhere in the vicinity. 3 Hermitage Drive has an amenity space begins at the rear and then transitions to the side of the property. In this case, the garden would totally contained at the front of the property and indicative of an overdevelopment of the site as the house/ garden relationship that is common in the area cannot be achieved.

Overall, the surrounding area (both Lincoln Gardens and Hermitage Drive) are not characterised of such 'backland' developments and development that does not face the street. This is with the exception of 26 Wargrave Road, which as discussed, due to its positioning has little view from any vantage point. This is not the case here. Rather, this site is a highly visible point in the context of two street scenes and therefore having no direct relationship to either is unsatisfactory. A positive relationship to both is also required, which Officers feel would be hard to achieve on this plot. The proposal fails to comply with policy TB06, specifically (i) and (ii). Paragraph 139 of the NPPF also states that *"Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes"*. This is the case here and will form a reason for refusal.

Neighbouring Amenity:

Policy R17 of the Borough Design Guide outlines the internal space standards for different sized residential dwellings. For a 3 bedroomed house, the minimum floor area is 87 sqm and the minimum combined floor area of living, dining and kitchen space is 29 sqm (based on an occupancy level of 5 individuals as indicated by number of bedspaces).

The submitted floor plans indicates a total floor area of approximately 100 sqm and a combined floor area of living, dining and kitchen space of meeting these minimum standards. The dwelling therefore exceeds the minimum overall standards and so future occupiers should enjoy a good standard of living accommodation in terms of the amount of living space. All habitable rooms would be served by window. However, a number of these would face onto boundary treatment due to the positioning of the dwelling being so close to site boundaries. The kitchen/ dining area is an example, however due to this room being open plan with the seating area, and this overall space having dual aspect, the open plan kitchen/ seating area could have the potential to have adequate outlook and light, combined with light received from a roof light.

The bathroom window would face onto a boundary, however this would likely be obscurely glazed and not a habitable room.

More problematically, two of the proposed bedrooms would have their only window facing onto the wooden boundary fence/ vegetation. There would be approx. 2m between these windows and the boundary. This would result in substandard outlook and light being received to these rooms.

As such, the proposal results in substandard accommodation owing to poor natural light and access in habitable rooms (bedrooms). This again is indicative of an overdevelopment of the site and will form a reason for refusal.

Existing occupiers

Policy CP3 of the Core Strategy states that development should not have an adverse impact on neighbouring properties. This is echoed by policy DH2 of the LPU.

Policy R15 and R16 of the Borough Design Guide outlines the separation distances required to maintain privacy and limit sense of enclosure.

Overlooking: R15 of the Borough Design Guide SPD requires the retention of reasonable levels of visual privacy to habitable rooms, with separation of 22-30m to the rear and 10-15m to the street. R23 notes that the side walls must not contain windows, especially at first floor level.

Sunlight and Daylight: R18 of the Borough Design Guide SPD aims to protect sunlight and daylight to existing properties, with no material impact on levels of daylight in the habitable rooms of adjoining properties. It also requires sufficient sunlight and daylight to new properties, with dwellings afforded a reasonable outlook, preferably dual aspect and no material impact on levels of daylight in the habitable rooms of adjoining properties. Habitable windows of adjoining properties must not be obstructed by a 25 degree angle and two storey extensions must not obstruct a 45 degree line back towards a habitable window of the adjoining property.

One of the closest residential properties to the site is 26 Wargrave Road which is a two storey dwelling. Owing to the proposed dwelling being a single storey dwelling, there would be no conflict of first floor windows. In terms of separation distances, there would be a distance of 13.5m between 26 Wargrave Road and the proposed dwelling which complies with R15 and R16 of the BDG which states that there should be a minimum distance of 12m when measuring back-to-flank. This is to maintain privacy and limit a sense of enclosure.

Owing to the height of the dwelling still proposed to be considerable, it would still be visible from the amenity space of 26 Wargrave Road. It would encompass the entirety of this property's rear boundary and there would be substantial development above any standard boundary treatment (ie. 2m fence). It is considered that this would negatively impact the enjoyment of this space. This is also the case for no. 3 Hermitage Drive's amenity space where the dwelling would be in close proximity of a large portion of their amenity space which would appear overbearing and unneighbourly.

Concerns have been raised regarding loss of light to neighbouring properties. Owing to the proposed bungalow's positioning and separation distances from neighbouring windows, Officers do not conclude that there would be a significant loss of light to neighbouring properties that would warrant a reason for refusal of the application. Owing to the cramped arrangement, windows would not have long reaching views and so no loss of privacy concerns are raised as a result of overlooking.

In terms of impact on other neighbours on Lincoln Drive, the development would unlikely affect these owing to the separation distances proposed and there not being a direct relationship with amenity spaces/ windows with these properties.

The impact of the development on no 3 Hermitage Drive and 26 Wargrave Road's amenity space will form a reason for refusal.

Amenity Space:

Policy R16 of the Borough Design Guide SPD advises a minimum depth of 11m for rear gardens and a 1m setback from the site boundary to allow access thereto. It should receive direct sunlight and be capable of accommodating play, clothes drying and storage.

As a result of the proposal, the amenity space for the existing dwelling would be reduced however would still be 12m which is compliant with the Borough Design Guide.

In terms of the amenity space for the proposed dwelling, this would be of a compliant size (depth of 11m). However, it would be situated at the front of the dwelling; comments on this arrangement have been made earlier in this letter as to the impact of that in design terms. The garden would also be intertwined with the proposed parking and access, again highlighting the overcrowded nature of the development.

Trees and Landscaping:

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 and Policy TB21 requires consideration of the landscape character.

R14 of the Borough Design Guide SPD requires well-designed hard and soft landscaping that complements housing.

Policy TW8 of the Twyford Neighbourhood Plan seeks to maximise opportunities for canopy cover including tree retention and planting.

A Tree Survey Report and an Arboricultural Impact Assessment Report is submitted and reviewed by the WBC Tree & Landscaping Officer. There are 10 trees that have been surveyed, most of which are offsite save for a Holly in the northern corner at 6m high. The larger trees are mature Horse Chestnuts in the neighbours garden to the north east (T6, T10), and large Austrian Pines (T2 T3), - these 4 trees are good quality 'B' trees. Additionally in the neighbouring garden there are 2 Sycamore along the dividing fence (T7, T8) Trees 6, 7 and 8 provide a good screen between the site and adjacent dwellings, although this cannot be relied upon in longevity. There is also 1 tree either side of the access from Hermitage Drive T9 and T11 which are a Lawson Cypress and a Rowan. The rooting areas from the boundary trees extend into the end of the rear garden of the site. The trees are not protected by TPO.

A shade constraints drawing is enclosed within the Tree Report along with a survey of the tree canopies, and a separate drawing showing the root protection areas. The shading drawing is useful for understanding visual impacts from large trees.

There will be minor incursions into the root protection areas of T6,7,8 and 11 with a need for temporary ground protection as a result of site access and set up. There will also be minor incursions from construction of foundation for the proposed building in the RPAs of T1 and T11 but are small and a specialist foundation is required. It is proposed to construct a new driveway for 2 cars and there will be minor incursions into RPAs of T7, 8 and 11 where ground protection will be required, and the use of a No Dig system is required for the driveway in order to protect T1 and T2.

Overall there would be minimal tree impacts. A Tree Protection Plan is submitted within the AIA Ref. PB/TPP-25/03.18 which is acceptable. An Arboricultural Method Statement is required as a condition as per paragraph 5.4.10 of the AIA.

A scheme for future landscaping (hard and soft) would have been required to be secured via a condition.

Highway Access and Parking Provision:

Policy CC07 and Appendix 2 of the MDD Local Plan stipulates minimum off street parking standards, including provision for charging facilities. Policy CP6 of the Core Strategy states that development should not adversely impact the wider highway network.

Policy TW1 of the Twyford Neighbourhood Plan encourages sustainable modes of transport.

Policy C5 of the LPU states that development proposals should provide and retain vehicle parking (including motorcycles) and cycle parking that caters for the needs of all users (including people with disabilities and visitors) that is appropriate to the location and the scale of development.

The proposal has been reviewed by WBC Highway Officers.

The proposed development is for the erection of one dwelling. Access is to be provided from the existing turning head on Hermitage Drive. Two parking spaces are proposed.

Sustainability

Highways have no objection to the sustainability of the development due to its proximity to facilities and public transport.

Traffic Impact

The proposed development is unlikely to have a significant impact on the local highway network. WBC Highway Officers did also not raise any safety concerns for pedestrians or cyclists.

Access

The turning head onto Hermitage Drive will be amended and used for access. A separate consent for the dropped crossing will be required from Traffic Management. Highways raise safety concerns regarding the current level of parking that occurs in the turning head. To satisfy the highway safety concerns of the proposed

development, Highways recommend the applicant apply to Traffic Management to provide yellow lines on the access.

Car Parking

Two car parking spaces is considered appropriate for the proposed number of habitable rooms. WBC standards state the minimum dimensions of 2.5m x 5.0m for each car parking space.

EV Charging

One EV charging point shall be provided. This is a requirement from Building Regulations (Approved Document S). This could be secured via condition.

Cycle Parking

Two cycle parking spaces are required. The applicant shall indicate direct access to the rear garden and cycle store on the plan. This would have been secured via condition.

Refuse and waste

The applicant is to provide refuse store location demonstrating it is in accordance with Manual for Streets which states the maximum refuse carrying distance for residents of no more than 30m, and 25m for refuse vehicles to the storage point. This would have been secured via condition.

Whilst WBC Highways did not comment on the loss of existing parking (as it is noted the stud is used for parking of multiple vehicles), this space is highway land and cannot be relied upon for parking as it is highway land. As such, the proposal will not result in the loss of formalised parking spaces.

Flooding and Drainage:

Policy CC09 of the MDD Local Plan and TW10 of the Twyford Neighbourhood Plan requires consideration of flood risk from historic flooding.

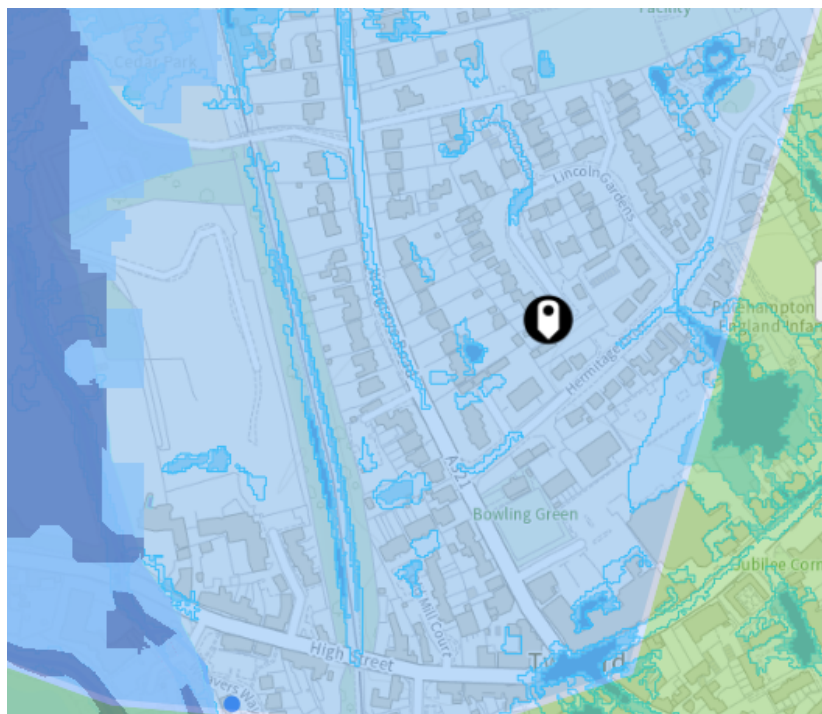
Policy CC10 of the MDD Local Plan requires sustainable drainage methods and the minimisation of surface water flow.

The site is within flood zone 1 and the development proposes managing surface water runoff via infiltration, with infiltration test rate calculation report 25020-RP-0001 1 dated 01/07/2025 indicated that infiltration is achievable. Worse case rate obtained 0.16m/hr (4.44 x 10⁻⁵m/s) with test carried out on the 12/05/2025.

However, WBC Drainage Officers note that despite being located within flood zone 1, the area experiences high groundwater levels and so groundwater monitoring data that indicates how high seasonal groundwater for the area is, is required. This is to ensure that the proposed infiltration will work. The submission indicates the preparation of a Surface Water Drainage Strategy, but this does not appear on file; rather only the infiltration calculations.

WBC Drainage Officers note from the photo within the above report that groundwater was not encountered 1m below ground. The investigation was however carried out in May, when groundwater levels would have dropped. Winter monitoring is required.

Whilst at present further information with regard to surface water run off is required, Officers note that the site is located within flood zone 1 and is for a modest scale proposal of one dwelling. Whilst the site is located within Groundwater Zone 2, this is not unique to the site (see map below with light blue indicating Ground Water zone 2) and the site pinpointed:



Therefore, in light of this, it is considered that subject to a suitable pre-commencement condition requiring a detailed drainage strategy, and if following further tests, infiltration will not be suitable, alternative surface water drainage will need to be provided.

A comment was raised from a member of the public questioning how the development will be connected to foul drainage. Within the submitted application form it states that the dwelling would be connected to a mains sewer. If the applicant had intended to connect to Thames Water's foul drainage systems then a separate process would have needed to be undertaken with Thames Water to establish that connection. Further details on this could have been secured via planning condition.

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 applicant has provided a Biodiversity Net Gain Assessment dated March 2025 by John Wenman Ecological Consultancy to support this application. However, as the site is a 'self-build' dwelling, it is exempt from the Statutory Biodiversity Net Gain obligation, and therefore the BNG report is superseded.

The information provided by the BNG report indicates the site is surrounded by pockets of deciduous woodland, treelines, hedgerows and a railway line within a 2km

radius. Surrounding habitats provide potential foraging, commuting and roosting opportunities for bats, hedgehogs, birds and badgers all of which are species of principal importance and some of which are European protected species. Although the BNG report references the roosting potential as negligible for trees on site, that is the only information regarding protected species. There is no information regarding other protected species, mitigation and compensation.

This proposed development requires a formal submission of a Preliminary Ecological Appraisal (PEA). Without a PEA to support this application, the development does not comply with Wokingham Core Strategy CP7: Biodiversity, paragraph b) and c) as we're unable to determine impacts to features of the landscape, impact of the development either directly or indirectly to species of principal importance and any mitigation or compensation measures required.

From the information supplied by a superseded BNG Assessment, the proposed layout does not adhere to TB23: Biodiversity and Development of the Wokingham Borough Managing Development Plan, paragraph a) and c), as the layout does not provide any new opportunities/features, neither does it allow for ecological permeability through the protection or provision of wildlife corridors.

A formal submission of a PEA is required to support this application. In addition, based on the information provided by a superseded BNG Assessment, the WBC Ecologist recommended a re-design of the layout to include retention and protection of wildlife corridors (hedgerows) and the provision of wildlife opportunities.

As such, the failure to demonstrate the proposal is acceptable in relation to species of principal importance, or that the proposal provides suitable opportunities/ features for biodiversity and this will form a reason for refusal.

Biodiversity Net Gain – s106

Furthermore, a reason for refusal will also be required relating to the fact that no completed s106 legal agreement has been secured to ensure the development remains as self-build.

Under Article 7(1A) of the Town and Country Planning (Development Management Procedure) Order 2015 (the DMPO), all applications for planning permission submitted after those dates are required to be accompanied by certain information relating to BNG, except where one of the exemptions specified in the legislation applies. The information required includes a declaration as to whether the applicant believes the BNG provisions apply to the application, and if not, the reasons why. Where none of the exemptions apply, the applicant should provide a completed biodiversity metric calculation, demonstrating the on-site habitat value as well as a number of other related details which are listed in sub-paragraph (c) of the aforementioned Article.

The applicant has indicated that the scheme would be self-build development, and this has also been added (with the agent's consent, to the description of development). To qualify as self-build and custom development, for the purposes of the relevant BNG legislation, the development would need to comply with the definition contained in Section 1(A1) of the Self-Build and Custom Housebuilding Act 2015. It establishes that the new dwelling must be occupied by the person or persons responsible for carrying

out or commissioning the building. The applicant has stated they would reside in the dwelling.

Nevertheless, there is no legal mechanism to secure the status of the proposed development as self-build. There is no legally binding S106 agreement or undertaking. The applicant's intention to build and occupy the proposed dwelling, this is not enough, on its own, to qualify as a self-build or custom development. It is not considered that attaching a planning condition to secure details of the future occupier/ ensure they have input into the design and layout is not sufficient as a condition would not meet the 6 tests for planning conditions outlined in the NPPF. This is supported by appeal decisions in the borough where Inspectors have reached this same outcome (eg. APP/X0360/W/25/3366261).

Environmental Health:

Policy CP1, specifically criterion 8, states that development should *"Avoid areas where pollution (including noise) may impact upon the amenity of future occupiers"*.

Policy HC5 of the LPU states that Development proposals will only be supported where it can be demonstrated that individually, or cumulatively in combination with other schemes, they do not have an unacceptable impact, either during the construction phase, or when completed, on:

- a) Human health, well-being or safety;
- b) Residential and public amenity;
- c) The quality of land, including soils and the subsurface;
- d) Air and Water quality (including surface water and groundwater); and
- e) Other sensitive receptors, including the natural environment.

Part of the proposed access to the site is potentially contaminated land. However, as it is assumed no ground works would be taking place on the access and no contrary information has been provided by Environmental Health Officers then the proposal is acceptable in this regard. However a condition would have been attached to ensure that any unexpected contaminated land is reported to the Local Planning Authority and necessary remediation is undertaken.

As the proposal is for a single dwelling in an established residential area, substantial noise pollution for existing neighbours or future occupiers is not envisaged, despite concerns raised by objectors. Environmental Health officers raised no concerns in regards to noise for these same reasons.

The site is also not located within a defined area of poor air quality.

Building Sustainability:

Policy CC04 of the MDD Local Plan and the Sustainable Design and Construction SPD require sustainable design and conservation and R21 of the Borough Design Guide SPD requires that new development contribute to environmental sustainability and the mitigation of climate change.

It should be noted that the above policies are out of date and were written before the Council's declared Climate Emergency. For this reason, the Council produced a Climate Change Interim Policy Position Statement (CCIPPS) (2022) which outlines

what is expected of development proposals in light of the climate emergency.

In relation to policy requirements outlined in CC04, it should be noted that the Code for Sustainable Homes Level 4 has now been withdrawn, and now applicants must meet the interim Future Homes Standard (as required by Building Regulations) of a minimum 31% reduction in emissions, in line with the CCIPPS. This would have been secured via condition.

With regards to water consumption, measures for internal water use for each dwelling at a standard of less than 110 litres per person per day is required. This water consumption standard to comply with the CCIPPS, which is a higher standard than that outlined in CC04 because Wokingham Borough is situated within part of the country classified as an area of serious water stress. This would have been secured via condition.

Planning Balance/ Conclusion:

The most important policies for determining the application are out of date by virtue of The absence of a 5 year housing land supply. Paragraph 11 of the Framework therefore states that permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination

Paragraph 8 of the NPPF sets out that achieving sustainable development means that development should satisfy three overarching objectives in relation to economic, social and environmental benefits.

Economically, the proposed development would enable job creation during the construction period although this would be very limited and short term given the scale of the proposal. The inhabitants would also contribute to the local economy and the continued viability of local services in the surrounding settlements. However, as the proposal is for one dwelling, the economic benefits of the development is considered to carry limited weight in the balance.

Regarding the **social** role the development would perform, the provision of one family sized 'self-build' dwelling in this location would not make a significant contribution to the Council's housing land supply position. Therefore, a moderate social role is performed.

Regarding its **environmental** role, the proposed dwelling would be located where future occupiers would have access to facilities/ amenities by non-motorised transport modes and therefore represents a sustainable location for development. Conditions could have also been attached to ensure that the dwelling meets certain sustainability/ efficiency standards. This is given moderate weight in the balance.

Turning to disbenefits of the scheme, the proposal has failed to provide a suitably and well-designed scheme. It fails to positively respond to multiple street scenes and is of design and scale that results in an overdevelopment of the plot. Consequently, it results

in and a cramped living arrangement for future occupiers, meaning some habitable rooms would have substandard access to light and outlook. Due to the close proximity of the built form to boundaries, it would also have adverse impact on neighbouring properties, particularly their amenity spaces. Lastly, the proposal has failed to demonstrate that it would have an acceptable impact on the natural environment with respect of protected species, biodiversity enhancements and biodiversity net gain.

As such, the adverse impacts would **significantly and demonstrably** outweigh the limited to moderate benefits, when assessed against the policies in this Framework taken as a whole.

As such, the recommendation is to refuse planning permission.

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 reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation. 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:	Not required
Recommendation:	REFUSE for the following reasons: 1. By reason of its layout, scale and siting, the proposal would represent a poorly designed, incongruous and cramped development that fails to positively relate the street scene of either Hermitage Drive, Lincoln Gardens or the area generally. The proposal is therefore contrary to Policies CP1 and CP3 of the Core Strategy, policy TB06 of the MDD, policy TW13 of the Twyford Neighbourhood Plan, Wokingham Borough Design Guide SPD and the NPPF. 2. Owing to its cramped arrangement and proximity to site boundaries, the proposed dwelling would fail to provide suitable outlook and natural light to habitable rooms, specifically two of the bedrooms. This results

	in a substandard level of accommodation, contrary to policies CP1 and CP3 of the Core Strategy, Wokingham Borough Design Guide SPD and the NPPF. 3. Owing to its cramped arrangement, proximity to site boundaries and scale of the dwelling, the development would have an imposing and unneighbourly impact on the amenity spaces of 26 Wargrave Road and 3 Hermitage Drive. The proposal is therefore contrary to policy CP3 of the Core Strategy, Wokingham Borough Design Guide SPD and the NPPF. 4. The applicant has failed to demonstrate that the proposal would not have an adverse impact on species of principal importance and that the proposal would provide any new biodiversity opportunities/features or ecological permeability through the protection or provision of wildlife corridors. The proposal is therefore contrary to policy CP7 of the Core Strategy, TB23 of the MDD and the NPPF. 5. In the absence of a completed legal agreement to secure the development as self-build, the development fails to qualify as exempt from mandatory Biodiversity Net Gain requirements under Article 7(1A) of the Town and Country Planning (Development Management Procedure) Order 2015.
Date:	25 November 2025
Earliest date for decision:	31 October 2025

Recommendation agreed by: (Authorised Officer)	
Date:	25/11/25

PLANNING CONSTRAINTS/STATUS**Affordable Housing Thresholds | Total count: 3**

#	NAME
1	Within Major Development Locations
2	Within Major Development Locations
3	Within All Development Locations

Scale and Location of Development Proposals | Total count: 1

#	FEATURE_TYPE	NAME
1	Major Development Locations	Twyford

Mineral Safeguarding Areas | Total count: 1

#	Type	SubType
1	Sharp Sand and Gravel	River Terrace deposits - Concealed resources in areas assessed by BGS

Major Nuclear Sites Consultation Zone | Total count: 1

#	FEATURE_TYPE	FEATURE_NAME	PLANNING_NOTE
1	Consultation Zone - Major Nuclear Site	AWE: Special Case Zone	ONR also requests to be consulted on planning applications, irrespective of distance from nuclear sites, for special cases. Developments that either introduce a new hazard or change the existing external hazards posed to nuclear sites.

Aerodrome Safeguarding: Heathrow Consultation Zone | Total count: 1

#	Height Band	Wind Turbine	Aviation
1	All works exceeding 150 metres (492.1 feet)	YES	YES

EA Groundwater Zones | Total count: 1

#	FEATURE_TYPE	FEATURE_NAME	CONSULT
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1	Groundwater Consultation Zones	Groundwater Consultation Zone 2	Environment Agency (only if application involves contaminated land) – see separate sheet: When to consult the Environment Agency
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BGS Radon Affected Areas | Total count: 1

#	FEATURE_NAME	CONSULT
1	Maximum radon potential is 1-3% of houses	Public Health England

Great Crested Newt Impact Risk Zones | Total count: 1

#	FEATURE_TYPE	FEATURE_NAME	CONSULT
1	Great Crested Newt Impact Risk Zone	Amber	For Householder applications check HH Layer. Consult NatureSpace for all other types of development

SSSI Impact Risk Zones | Total count: 1

#	IRZURL
1	https://irz.geodata.org.uk/IRZ/step2.html?irzcode=03010005000507&es=&location=476719,175387%20(IRZ%20polygon%20centre)

Landscape Character Assessment 2019 | Total count: 1

#	FEATURE_TYPE	Name
1	Landscape Character Assessment 2019	Wargrave-Twyford Arable Chalk Lowlands

Wards | Total count: 1

#	NAME	Closest Approximate Distance
1	Twyford, Ruscombe & Hurst Ward	0 m

Parishes | Total count: 1

#	NAME	Closest Approximate Distance
1	Twyford CP	0 m