

DELEGATED OFFICER REPORT



WOKINGHAM
BOROUGH COUNCIL

Application Number:	251268
Site Address:	Goffs Barn, Wargrave Road, Wargrave, Wokingham, RG10 8DJ
Expiry Date:	15 August 2025
Site Visit Date:	8 July 2025
Proposal: (retrospective) Change of use of agricultural land to a use comprising the siting of 10 mobile homes for residential occupation by agricultural workers in connection with Sheeplands Farm.	

PLANNING CONSTRAINTS

Countryside
Green Belt
Flood Zones 1 and 2
Green Routes and Riverside Pathways
Archaeological sites
Radon affected area
Great Crested Newt Consultation Zone – Green, Amber and Red Risk Zones
Bat Roost Habitat Suitability

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 CP5 - Housing mix, density and affordability CP6 – Managing Travel Demand CP7 – Biodiversity CP9 – Scale and Location of Development Proposals CP11 – Proposals Outside Development Limits CP12 – Green Belt 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 CC05 – Renewable Energy and Decentralised Energy Networks CC06 – Noise CC07 – Parking CC09 – Development and Flood Risk CC10 – Sustainable Drainage TB01 – Development within the Green Belt TB02 – Development adjoining the Green Belt

	TB05 – Housing Mix TB21 – Landscape Character TB23 – Biodiversity and Development
Wokingham Borough Local Plan Update (LPU)	SS1 – Sustainable development principles SS2 – Spatial strategy and settlement hierarchy SS5 – Development in the countryside SS6 – Development in the Green Belt SS8 – Meeting our employment needs SS10 – Meeting our housing needs SS16 – Safeguarded routes SS17 – Transport improvements CE6 – Reducing energy consumption in existing buildings CE7 – Low carbon and renewable energy generation CE8 – Protecting renewable energy generation C1 – Active and sustainable transport and accessibility C2 – Mitigation of transport impacts and highway safety and design C3 – Active travel C4 – Green and blue infrastructure and public rights of way C5 – Parking and electric vehicle charging C8 – Utilities ER3 – Supporting the rural economy H1 – Housing mix, density and standards H3 – Affordable housing H5 – Rural workers' dwellings FD1 – Development and flood risk (from all sources) FD2 – Sustainable drainage FD3 – River corridors and watercourses NE1 – Biodiversity and geodiversity NE4 – Trees, woodland, hedges and hedgerows NE5 – Landscape and design DH1 – Place making and quality design DH2 – Safeguarding amenity HC5 – Environmental protection HC9 – Contaminated land and water
Other	Borough Design Guide Supplementary Planning Document CIL Guidance + 123 List Affordable Housing Supplementary Planning Document Wargrave Parish Design Statement

PLANNING HISTORY		
Application No.	Description	Decision & Date
CLE/2010/1310	Application for a certificate of lawfulness for existing building works relating to 21 mobile homes comprising construction of earth bunds, erection of fencing, laying of underground drains and services and construction of hardstandings.	Refused 18/08/2010
150522	Proposed change of use of land for the siting of four mobile homes for occupation by agricultural	Refused, dismissed at

	workers	appeal 27/06/2016
242918	Application for a certificate of existing lawful development for the use of land for the stationing of 64no. mobile homes for use as habitable accommodation by farm staff, staff shop, staff launderette portacabin and staff parking, and operational development including staff amenity building, staff gazebo building and associated pathways, hardstanding and drainage.	Refused 23/01/2025
250374	Application for a certificate of existing lawful development for the use of land for the stationing of 64no. mobile homes for use as habitable accommodation by farm staff, staff shop, staff launderette portacabin and staff parking, plus operational development comprised of 2no. buildings.	Approved 30/04/2025

CONSULTATION RESPONSES

Internal

WBC Property Services – No comments received
WBC Drainage – Request further information (see main body of report)
WBC Highways – No objections subject to condition(s)
WBC Growth & Delivery (Planning Policy) – No comments received
WBC Economic Prosperity & Place (Community Infrastructure) – Request Affordable Housing contribution (see main body of report)
WBC Green Infrastructure – No comments received
WBC Landscape and Trees – No objections
WBC Health and Wellbeing – No comments received
WBC Community Safety – No comments received
WBC Sustainability – Comments not required due to nature of accommodation proposed.
WBC Ecology – No comments received
WBC Cleaner and Greener – No comments received

External

Office for Nuclear Regulation – No objections
Southern Gas Networks – No comments received
The Environment Agency – Objections (see main report)
Royal Berkshire Fire & Rescue – General fire safety advice
BOB ICB NHS Buckinghamshire Oxfordshire and Berkshire West – No comments received
Berks, Bucks & Oxon Wildlife Trust – No comments received
Crime Prevention Design Advisor – No comments received
SSE Power Distribution – No comments received
National Gas Transmission – No comments received

REPRESENTATIONS

Parish/Town Council	No objections
Ward Member(s)	No comments received
Neighbours	No comments received

APPRAISAL

Site Description:

The application site consists of a mobile home park situated on Sheeplands Farm, Wargrave Road. The farm is run by the Hall Hunter Partnership (HHP) who employ workers for their farms who subsequently can live within the mobile home park during their employment. Sheeplands Farm primarily focuses on berry growing.

The site is accessed via a long and narrow rural road from Wargrave Road to the east and is visually enclosed by large agricultural polytunnels to the south, north and west. Immediately east of the application site is a main railway line that connects Twyford and Wargrave train stations.

Due to the site's predominantly rural/agricultural surroundings, the site is located within the designated Countryside and Green Belt.

Proposal Description:

This application seeks approval for the retrospective stationing of ten mobile homes for residential occupation by agricultural workers in connection with Sheeplands Farm.

The site already hosts 64 other mobile homes on site for agricultural workers, regularised through the approval of CLUED application 250374 in April 2025. Ancillary facilities on site for residents of the homes includes an amenity building (gym, tv etc), a tuck shop, laundry portacabin and a gazebo.

The proposals would result in a total of 74 mobile homes on site. The ten proposed are located to the immediate south of the existing 64 homes and are legibly spaced apart, maintaining a linear development pattern.

Principle of Development:

General:

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.

Local Plan Update (LPU):

The Council are also progressing with their Local Plan Update (LPU) which has progressed beyond the Proposed Submission Plan (Regulation 19) stage, with representations received on the plan's legal compliance and soundness between 30 September and 13 November 2024.

The Proposed Submission Plan (Regulation 19) consultation has now closed, and the Council have now analysed the representations received. The Regulation 22 plan

was submitted to the Secretary of State for independent examination in February 2025, and two Planning Inspectors have been appointed to examine (EiP) the plan. The examination of the local plan is ongoing, and the council responded to initial questions and requests from the Inspectors in May 2025.

As seen in High Court judgements, even when an emerging plan is at an advanced stage, it may still attract limited weight if further consultation and modifications are required, and the Inspector has yet to issue a final report. Wokingham's LPU has several stages yet to be completed, including the examination hearings and main modifications stages, which restricts the weight that can currently be afforded to non-substantive.

The Council however acknowledge that there are unresolved objections on substantive grounds pursuant on the majority of relevant policies listed above, meaning weight attracted to these policies is limited.

Core Strategy 2010:

Policy CP12 of the Core Strategy refers to national policy to enforce its aims, therefore attention turns to the 2024 National Planning Policy Framework (NPPF).

The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

Paragraph 153 of the NPPF states that when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt, including harm to its openness. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

Paragraph 154 of the NPPF provides a list for exceptions for development that can be considered appropriate in the Green Belt. Of particular relevance to this application scheme is sections a) and b) which read:

a) buildings for agriculture and forestry;

b) the provision of appropriate facilities (in connection with the existing use of land or a change of use), including buildings, for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;

With regards to exception a), the proposed development technically does not involve buildings but the mobile homes are used in association with agriculture.

Similarly, exception b) does not limit specific uses for appropriate facility provision and it is reasonable to conclude that these uses cover agriculture; agricultural buildings and facilities are supported by national Green Belt Policy, as seen in section

a) above.

The second part of section b) requires appropriate facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it. The mobile homes are well enveloped by existing development in the form of mobile homes to the south, polytunnels to the north and west and The Piggott School to the east. In the context of the existing mobile home park, the ten additional homes are a modest extension that would not be seen to harm the openness of the Green belt. It is also important to highlight that the mobile homes are technically temporary features within the Green Belt, with their removal required in the future should the use cease.

Overall, the proposed development is considered to be appropriate development in the Green Belt, subject to the assessment of essential need below.

Countryside:

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. This criteria is as follows:

- 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 use of the mobile homes for agricultural workers complies with the first exemption criteria of CP11 as the farm is considered to be a sustainable form of rural enterprise.

With regards to exemption two, the mobile homes are well enveloped by existing development in the form of mobile homes to the south, polytunnels to the north and west and The Piggott School to the east. This modest extension to the mobile home park is therefore not considered to result in the excessive encroachment or expansion of development away from the original buildings

The wording of Policy CP11 requires compliance with criteria 1, 2 and 3. Compliance

with criterions 1 and 2 are noted and criterion 3 does not apply to the proposal. The proposed development is therefore acceptable in principle.

Essential Need:

Paragraph 84 of the NPPF sets out that new isolated homes in the countryside should be avoided unless there are special circumstances, and provides a non-inclusive bulleted list of the factors that may constitute such special circumstances, including at bullet point 1 where there is a need for a rural worker to live permanently at or near their place of work in the countryside. Neither 'essential' nor 'rural' are defined by the NPPF.

Whilst Annex A to former Planning Policy 7: Sustainable Development in Rural Areas is no longer extant, it reinforces the interpretation of 'rural worker' by setting out that one of the few circumstances in which isolated residential development may be justified where accommodation is required to enable agricultural, forestry and certain other full-time workers to live at, or in the immediate vicinity of their work. Superseding this, the Planning Practice Guidance titled 'Housing Needs of Different Groups' provides further context to the requirements of paragraph 84 of the NPPF, namely:

- evidence of the necessity for a rural worker to live at, or in close proximity to, their place of work to ensure the effective operation of an agricultural, forestry or similar land-based rural enterprise (for instance, where farm animals or agricultural processes require on-site attention 24-hours a day and where otherwise there would be a risk to human or animal health or from crime, or to deal quickly with emergencies that could cause serious loss of crops or products);

HHP employed a total of 451 people at Sheeplands Farm, both permanent and temporary staff over the 2024 season, with the seasonal staff employed mainly between April to October. The heated tunnels on the farm extend to the growing season in the spring and the autumn. The farm produced 2400 tonnes of strawberries, 665 tonnes of raspberries and 150 tonnes of blueberries in the 2024 season. The berries picked at Sheeplands Farm are transferred to Heathlands farm for packing and distribution. Most of the crop is supplied to the large supermarket chains.

HHP employ about 300 permanent staff and 1000 seasonal workers. Hall Hunter are one of the largest soft fruit producers in the UK, producing about 7000 tonnes of berries annually and one of the largest employers in the Wokingham area. During the peak season in 2024 the number of permanent and seasonal staff living on the site reached 451.

In 2025 HHP expect to grow 686 tonnes of raspberries at Heathlands and Sheeplands with 685 tonnes of these coming from Sheeplands. Since the 10 mobile homes subject to this application were brought onto the site the annual berry yields at Sheeplands have increased by 1,125 tonnes (64%). The harvest period is from May to October when seasonal staff are required to maintain and pick the fruit. For the remainder of the year full time labour is required for the preparation and management of the plants and maintenance of the equipment and polytunnels.

Soft fruit production is labour intensive and relies on experienced staff to run the farming operations, maintain and pick the fruit. Raspberry harvesting is particularly labour intensive. Raspberries must be picked every 2–3 days during the season to avoid spoilage and overripe fruit, unlike strawberries, raspberries ripen gradually, meaning repeated passes are required throughout the harvest period. Raspberry harvesting is slower and more physically demanding due to plant layout and reach requirements. Raspberry pickers typically pick 5.5 kg per hour compared to strawberries at 25 kg per hour. Raspberries therefore have a higher staff ratio requirement than other berries.

Raspberries also require skilled staff because pickers must accurately judge ripeness, as underripe berries do not ripen post-harvest, and overripe ones collapse. Raspberries are also graded by colour – light, medium, and dark – requiring pickers to sort while harvesting. In contrast strawberry picking requires less precision and minimal grading. Raspberry picking is therefore a more specialist task demanding trained, consistent workers.

In terms of functional need, fruit growing is a 24/7 operation requiring workers to be on site to respond to emergencies that can occur at any time to address issues as they arise. Particular issues include:

- Irrigating stock by drip irrigation and partly by hand, with the latter carried out early in the morning or later in the evening during hot sunny periods to prevent burning or scorching of the plant.
- Provision of mobile heaters to protect less hardy plants via mobile heaters from autumn to spring particularly.
- Covering plants with fleeces to protect stock in the evening and uncovering during the day to give plants as much daylight/growing time as possible.
- Checking automated systems are set up and running correctly, responding to any breakdowns or emergencies.
- Spraying, which generally needs to be undertaken early in the morning or evening, for example vine weevils have to be sprayed at night.
- Applying fertilisers and compost/manure etc, including liquids which cannot be applied in sunlight.
- Ventilation of plants particularly in the summer and during periods of rapid temperature changes.
- Removal of snow from polytunnels to avoid collapse sometimes during periods of persistently heavy snow. This can involve work through the night.
- During windy periods small gaps/flapping plastic needs to be addressed quickly to prevent greater damage.

The scale of loss to the business resulting from unexpected weather events could be considerable, resulting in a significant negative impact on the business.

Overall, the Council accept the overall need of these homes and how their stationing at the site allows further expansion of the berry growing at the farm.

Character of the Area:

The immediate locale of the application consists of predominantly agricultural surroundings, as described above. The homes would be enveloped by existing

development and is viewed as a modest extension to the existing mobile home park. Whilst in the Green Belt, public viewpoints are minimal and the overall impact on its openness and rural character would be limited.

Overall, the impact on the character of the area would be acceptable.

Neighbouring Amenity:

There are no neighbouring amenity concerns; the mobile homes are acceptably spaced apart from each other and would not harm the amenities on any surrounding properties.

Highway Access and Parking Provision:

WBC Highways consider that the provision of agricultural workers accommodation reduces the need to travel and therefore offers sustainable merits. The supporting information states that there is a low level of car ownership amongst the workers and therefore outside of working hours they are likely to utilise sustainable modes of travel to access services and amenities within Wargrave and Twyford centres.

The mobile homes would be served via an existing access to the site, via a private road onto A4 Bath Road and A321 Wargrave Road. There is a footway/cycleway on Wargrave Road and cycling is considered to be a viable alternative to the private car. Access to the 850 bus service to Reading/High Wycombe is also possible.

Overall, WBC Highways have no objections to the proposed development. They have requested the inclusion of a cycle parking condition but from the Case Officer's visit to the site, each mobile home has its own private area of amenity space where bicycles could be stored. Therefore, its inclusion is not considered necessary to make the scheme acceptable.

Flooding and Drainage:

Surface Water Drainage

The homes are already connected to the site's existing drainage system that was regularised through the approval of CLUED application 250374. No objections are raised in this regard.

Fluvial Flooding

The application is located across both Flood Zones 1 and 2. The homes themselves are located within Flood Zone 1, whereas the access road that connects to the public highway is located within Flood Zone 2.

Whilst the location of the homes within Flood Zone 1 does not raise any additional flooding concerns, concerns were raised regarding the fact that the access road, which would be used for evacuation purposes in the event of a flood, is located within an area of higher flood risk.

The Environment Agency subsequently objected to the proposed development on the grounds of a lack of flood risk assessment, demonstrating that occupants of the homes could be safely evacuated in the event of a flood.

In response to the above, the applicant has provided a Flood Risk Assessment which

demonstrates that an alternative evacuation route is available to the south of the homes proposed (adjacent to Loddon Park Farm) and is within the applicant's ownership. This alternative evacuation route is considered acceptable.

Subject to compliance with this Flood Risk Assessment, no objections are raised in this regard.

Landscape and Trees:

WBC Landscape and Trees have no objections to the development's impact on existing vegetation or the prevailing landscape character.

Ecology:

Great Crested Newts:

The application site is located across Green, Amber and Red Risk Zones for Great Crested Newts. Despite this, the mobile homes proposed are raised off of the ground, meaning any newts present on site could still travel underneath them. It is considered that due to the nature of the works and distance from the nearest recorded pond that there would be no adverse impact on GCNs.

Affordable Housing:

The application proposal involves ten residential units outside of development limits. As per CP5 of the Core Strategy, this requires a 40% contribution of affordable housing provision, either through the delivery of on-site provision or through an off-site commuted sum.

The Council's Affordable Housing team do not consider that an on-site contribution is possible. Therefore, they have requested an equivalent commuted sum of £360,120.38 index-linked towards affordable housing in the borough.

It is acknowledged that National policy does not specifically define agricultural workers dwellings as affordable housing. Appendix 2 of the NPPF defines affordable housing as the following:

"Housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions:

*a) **Social Rent:** meets all of the following conditions: (a) the rent is set in accordance with the Government's rent policy for Social Rent; (b) the landlord is a registered provider; and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision.*

*b) **Other affordable housing for rent:** meets all of the following conditions: (a) the rent is set in accordance with the Government's rent policy for Affordable Rent, or is at least 20% below local market rents (including service charges where applicable); (b) the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider); and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy*

to be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent).

*c) **Discounted market sales housing:** is that sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households.*

*d) **Other affordable routes to home ownership:** is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low cost homes for sale (at a price equivalent to at least 20% below local market value) and rent to buy (which includes a period of intermediate rent). Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision, or refunded to Government or the relevant authority specified in the funding agreement.”*

Similarly, the Council's Affordable Housing SPD (2013) makes no reference to agricultural workers dwellings.

Contrary to the above, it is the LPA's viewpoint that the agricultural workers accommodation proposed is considered a form of affordable housing, thereby meaning that an off-site commuted sum is not required.

The Planning Statement outlines that the average wage for seasonal staff is relatively low (about £500 per week) and they pay a weekly rental of £75 for the mobile home accommodation. It is not feasible for seasonal workers to rent locally given the lack of supply, the cost and the relatively short period for which the accommodation is required in the season.

It may be feasible for some staff to live within a short distance of the site and fulfil the needs of the business. The site however lies in an area of high property prices and the business cannot afford to purchase additional housing in vicinity of the site to accommodate its staff and it would be unreasonable to require the business to do so.

The supply of rental properties in the area is limited and rentals are high. Properties within 3 miles of the RG10 8DJ postcode range from about £900 per month for a single room studio to about £2,500 per month for a four bedroom property. These rental properties are normally let on a full time basis, and it would not be affordable for staff or HHP to rent.

With consideration for the above, it is abundantly clear that the rent prices for the workers dwellings are consciously affordable and well below current market rates. Whilst HHP is not a registered provider, the homes would require removal if the farm use were to cease anyway, and the farm would need to maintain rent rates well below market rates to maintain their staff levels.

Overall, the LPA's view is that the proposed development provides the provision of 100% affordable housing. A commuted sum is therefore not required.

Conclusion:

Overall, the proposed development complies with the development plan and is recommended for approval, subject to conditions.

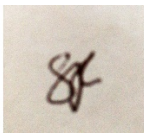
Community Infrastructure Levy (CIL):

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:	Not required
Recommendation:	Approval
Date:	8 August 2025
Earliest date for decision:	8 July 2025

Recommendation agreed by: (Authorised Officer)	
Date:	8.8.25