‘Permission in Principle’ - PLANNING, DESIGN AND ACCESS STATEMENT to be read in conjunction with drawings submitted for:

Brookfield Farm, Old Wokingham Road, RG40 3BU

Erection of up to between 2 and 6 dwellings together with convenience store;
revised application further to 260200



The application site circled yellow above comprises paddock land within the countryside. The site is sustainably located a short distance to the north of the settlement expansion at Crowthorne.

The site lies to the west of Old Wokingham Road and to the east of several existing dwellings within **Brookfield Farm**. The access road is owned by the applicant. As

such the site is not isolated. The site is accessed via Old Wokingham Road and is bounded by a combination of fences and trees. The site lies outside any Conservation Area. There are no Listed buildings in the vicinity.

The **traffic** light highlighting and bold type face throughout the Planning Statement emphasises the suitably of the proposal against the material planning considerations as part of the planning balance exercise.

Planning history

260200 - Erection of up to 9 self build dwellings – refused 27 March 2026 for the following reasons – COMMENTS added

1. The site is not sustainable in transport terms with regards to its location and access to day-to-day services and facilities. Future residents of the development would also not have access to a good standard of bus service and would have an attractive walking or cycling routes/ environments when outside the site. The proposal will therefore result in high dependence on private vehicle use and represents an unsustainable development, contrary to policies CP1, CP3 and CP6 of the Core Strategy and policy CC01 paragraphs 110 and 115 of the NPPF.

COMMENT – Post refusal the new National Planning Policy Framework 2026 (NPPF 26) has been adopted. The following policies are now engaged with a presumption in favour of sustainable development on the basis that the Council's current policies have failed on the basis of the acknowledged lack of a 5 year housing land supply.

National decision-making policies

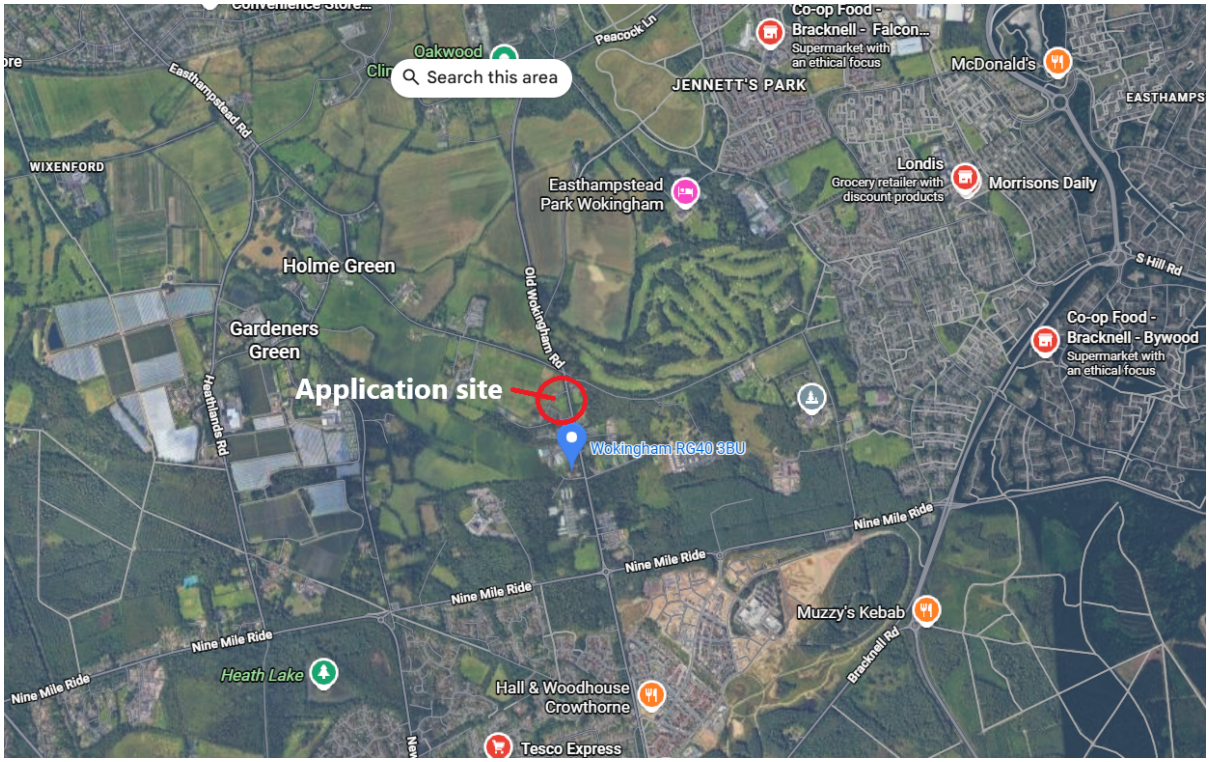
TR3: Locating development in sustainable locations

1. So that development is located where it can support sustainable patterns of movement, enable good accessibility for different users and make the most of existing and proposed transport infrastructure, development proposals should reflect the following principles, taking into account the vision for the site, the type of development and its location:
a. Development proposals which could generate a significant amount of movement, in the context of the area within which they would be situated, should be in locations that are sustainable (or which can be made so, taking into account planned improvements, including any provided for as part of the development itself). This means the location should limit the need to travel, particularly by private car, and offer a genuine choice of transport modes for residents and users, unless the nature of the development would make this impractical.

COMMENT – Whilst the previous proposal for up 9 dwellings could have been argued to generate a significant amount of movement; the revised proposal for between 2 –

6 dwellings allows the decision maker to qualify what number of dwellings would not generate a significant amount of movement.

The inclusion of a convenience store would reduce vehicle movements for both the proposed housing and other residents by obviating the need for them to travel further afield to convenience stores.



HO7: Meeting the need for homes

1. *In applying the policies in this Framework, substantial weight should be given to the benefits of providing homes which will contribute towards meeting the evidenced accommodation needs of the community, as identified through needs assessments prepared for the area of the local planning authority and other relevant evidence. This includes, but is not limited to, homes needed for different groups assessed under policy HO1.*

National decision-making policies
S3: Presumption in favour of sustainable development

1. *Decisions on development proposals should apply a presumption in favour of sustainable development. This means:*

a. *Outside settlements, policy S5 should be applied; and*
b. *In all locations, development proposals that accord with both an up-to-date development plan and the decision-making policies in this Framework should be approved without delay.*

S5: Principle of development outside settlements

1. *Only certain forms of development should be approved outside settlements, as set out in the following list. These should be approved, unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in this Framework:*

c. The redevelopment of previously developed land (including a material change of use to residential ***or mixed-use including residential****)*

j. Development which would address an evidenced unmet need (including, but not limited to, development proposals involving the provision of housing where the local planning authority cannot demonstrate a five year supply of deliverable housing sites or scores below 75% in the most recent Housing Delivery Test27), and where the development would:

i. Be physically well-related to an existing settlement28 (unless the nature of the development would make this inappropriate) and be of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure.

2. *In applying this policy, the circumstances in which the benefits of approving development proposals are likely to be substantially outweighed by adverse effects include, but are not restricted to, situations where the development proposal would fail to comply with one of the national decision-making policies which state that development proposals should be refused in specific circumstances.*

COMMENT – There are no national decision-making policies which state that development proposals should be refused in specific circumstances – the previous NPPF 24 'strong reason for refusal' is no longer applicable.

DM3: Determining development proposals

1. *When considering development proposals, local planning authorities should:*
a. *Work with the applicant in a positive and proactive manner, where necessary seeking solutions to problems arising from initial proposals, to enable a timely decision;*
b. *Take a proportionate approach to the consideration of the planning matters raised by the proposals, in a way that reflects their scale, complexity and potential impact;*
c. *Take account of planning matters raised during any pre-application engagement, including any positive responses to this engagement, as well as representations on the proposals;*
d. *Consult statutory or internal consultees only where it is necessary to do so. Decisions on development proposals should not be delayed in order to secure advice from a statutory or internal consultee beyond their statutory deadlines*

unless there is insufficient information to make the decision, there are public safety risks from proceeding without advice, or more detailed advice may enable an approval rather than a refusal;

e. Consider whether otherwise unacceptable development proposals could be made acceptable through the use of planning conditions or planning obligations; and

f. Not refuse applications for development which should clearly be approved, having regard to their accordance with the development plan, the policies in this Framework and any other material considerations.

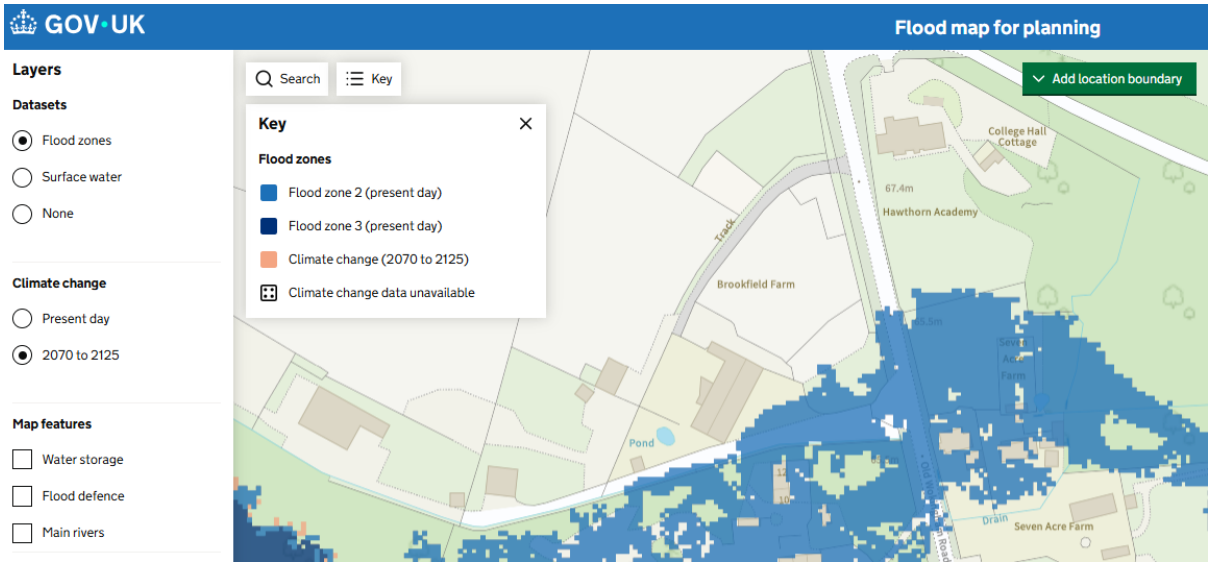
2. The proposal represents inappropriate development within designated countryside. By virtue of the amount of development proposed the development would fail to integrate with the rural pattern of development along Old Wokingham Road and would harm the character and appearance of the surrounding countryside. The proposal is therefore contrary to policies CP1, CP3, CP9 and CP11 of the Core Strategy, policies CC01 and TB21 of the MDD, the Borough Design Guide and the NPPF.

COMMENT – the amount of development proposed has been reduced to between 2 and 6 houses along with a convenience store.

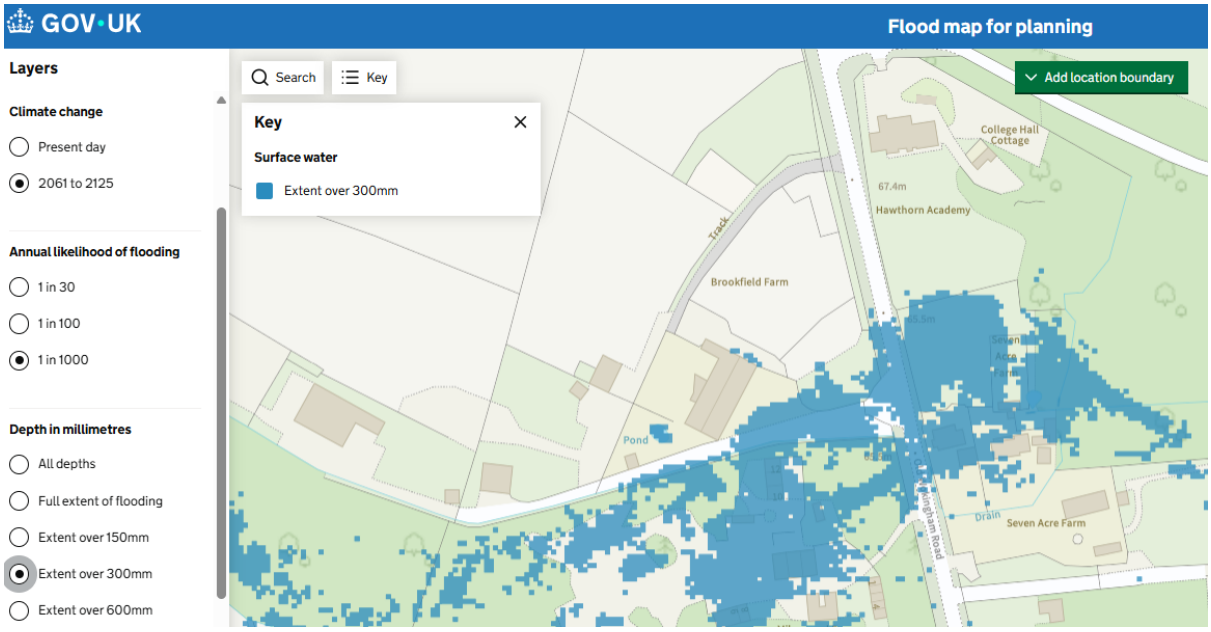
3. The applicant has failed to undertake the Sequential Test, therefore, it has not been demonstrated that there are no reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding (paragraph 174 of the NPPF). The proposal therefore fails to adopt a sequential, risk based approach to flood risk, contrary to Section 14 of the National Planning Policy Framework (2024) and policies CC09 and CC10 of the Managing Development Delivery Local Plan (2014).

COMMENT – The residential dwellings within the site are now located outside any flood or surface water zone. Notwithstanding, if we are wrong that this negates the need for a sequential test. It is clear that an alternative option would be to re-open the access to the north to serve the development.

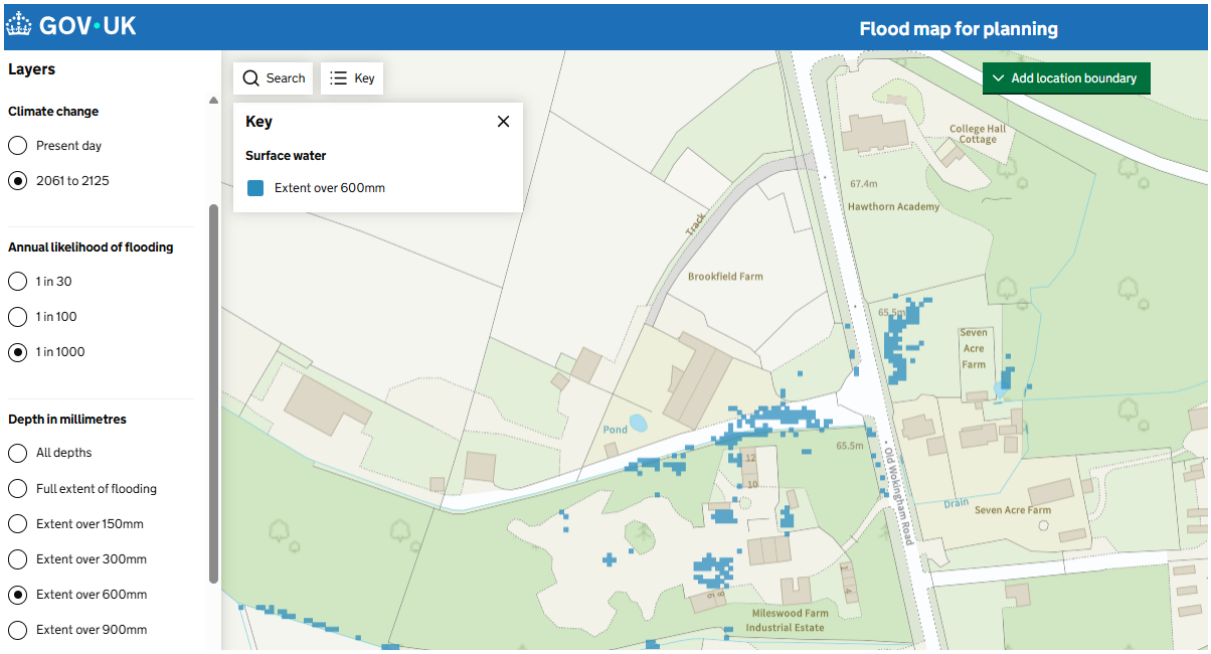
As part of a subsequent technical details application flood drainage solutions are capable of being resolved.



Above – Extent of Flood Zone 2



Above – Extent of surface water over 300 mm (1 in 1000 years)



Above – Extent of surface water over 600 mm (1 in 1000 years)

4. The application site lies within Flood Zone 2 and within an area at risk from flooding from groundwater and surface water. As no site- specific Flood Risk Assessment has been produced, it has not been demonstrated that the proposal would not increase flood risk elsewhere and that the development would be safe for its lifetime. The proposal therefore fails to adopt a risk based approach to flood risk, contrary to Section 14 of the National Planning Policy Framework (2024) and policies CC09 and CC10 of the Managing Development Delivery Local Plan (2014).

COMMENT – The residential dwellings within the site are now located outside Flood zone 2. As part of a subsequent technical details application flood drainage solutions are capable of being resolved.

5. In accordance with Article 5B of the Town and Country Planning (Permission in Principle) Order 2017 (as amended) and the National Planning Policy Guidance, Permission in Principle must not be granted for development which constitutes 'habitats development'. The application site lies approximately 1.7km from the Thames Basin Heaths Special Protection Area (SPA), which is a qualifying European site. In the absence of any mechanism at the permission in principle stage to secure the avoidance and mitigation measures required to ensure that the development would not have an adverse effect on the integrity of the SPA, the proposal is classed as habitats development and cannot lawfully be approved. Consequently, the LPA is unable to conclude as required by Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended) and Article 6(3) of Directive 92/43/EEC, that the development would not harm the Thames Basin Heaths SPA. The proposal is therefore contrary to Policy NRM6 of the South East Plan, Policies CP8 and CP4 of the Wokingham Borough Core Strategy.

COMMENT – The applicant is agreeable to making the appropriate SPA contribution as part of the application. As the application proposes a range of dwelling numbers between 2 and 6, it is requested that the planning officer confirm what number would be supported and what the contribution figure would be so that an agreement can be entered into.

As confirmed by the aerial photo below the site is well screened by mature boundary planting.



Above – Existing context



Above – Proposed site plan
Below – Previously proposed site plan



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The scheme as presented in principle comprises:

- 2 x 2 bed dwellings
- 4 x 3 bed dwellings

Executive summary to application

The Council cannot currently demonstrate a five year supply of deliverable housing sites and so the presumption in favour of development, set out in paragraph 11 of the NPPF.

4. Five-Year Housing Land Supply at 31 March 2025

4.1 This section sets out the deliverable housing land supply position, for the period 1 April 2025 – 31 March 2030.

Table 4.1. Housing land supply at 31 March 2025 (LHN 1,316)

House Land Supply Category	Number of Dwellings Needed
Housing need at 1,316 homes per annum 01/04/2025 – 31/03/2030	6,580
Housing need plus 5% buffer for period 01/04/2025 – 31/03/2030	6,909
Annual rate for 5 years plus 5% buffer	1,382
Total deliverable housing supply for period 01/04/2025 – 31/03/2030	3,414[29]
Total deliverable housing supply in years for period 01/04/2025 – 31/03/2030	2.5 years

Source: Wokingham Borough Five Year Housing Land Supply Statement at 31 March 2025

Against a list of assessment criteria covering **Footpath accessibility to site, Speed limit outside site, Distance to edge of built up area, Distance to nearest bus stop, Distance to nearest school, Distance to nearest convenience store / pub, Distance to nearest train station, Cycling a realistic option and Quantum / density**, it can be concluded from **that *the development would be in a sustainable location.***



Above – Proximity to settlement boundary comparison of allowed up to 350 houses at APP/X0360/W/24/3354667 - Land adjacent to Blagrove Lane, Wokingham RG41 4AX to current proposal

ALLOWED appeal Ref: APP/X0360/W/24/3354667 - Decision date: 29th May 2025 at Land adjacent to Blagrove Lane, Wokingham RG41 4AX by Berkeley Strategic Land Limited against the decision of Wokingham Borough Council. The application Ref is 222306; **"Outline application, with all matters reserved except for access, for the proposed erection of up to 350 dwellings (Use Class C3) and care home (Use Class C2), with new accesses onto Barkham Road and Blagrove Lane, landscaping and onsite SANG, following demolition of outbuildings and agricultural buildings".**

Analogous extracts from appeal decision below:

Main Issues
6. The main issues are: (a) whether the proposal would accord with the spatial strategy in the development plan; (b) whether the proposed development would cause the coalescence of Wokingham and Barkham; (c) the effect of the proposed development on the character and appearance of the area, including on the surrounding landscape and Bottle Copse Local Wildlife Site ("LWS"); (d) the effect of the proposed development on the Thames Basin Heath Special Protection Area ("SPA"); and (e) whether the proposed development would make adequate provision for affordable housing, the care home, on and off-site highway works, sustainable travel infrastructure, public open space and allotment facilities, local employment skills, and the NHS.

10. Policy CC02 of the Adopted Managing Development Delivery Local Plan ("MDD") sets the development limits for each settlement in the borough. Although the appeal site lies at the edge of Wokingham, it is outside of the development limit, and it is not one of the Strategic Development Locations identified in the development plan. As such, the site lies within the countryside and does not

accord with MDD Policy CC02. The site's natural green space does, however, fall within the MDD's definition of GI, which has a number of objectives.

14. Despite the identified policy conflict, the CS was adopted based on the requirements of the SEP prior to the first publication of the Framework in 2012, which introduced a shift in approach to boost significantly the supply of housing. Hence, the CS's approach to the delivery of housing did not follow the Framework's method, and it has not been reviewed since it was adopted. Thus, the CS's assessment of development needs does not reflect the current and previous versions of the Framework, which have housing requirement figures of 1,336 dwellings per annum ("dpa") and 748 dpa respectively.

15. Consequently, the housing requirement has now considerably increased compared to CS Policy CP17, and it is inconsistent with the Framework's aim of significantly boosting the supply of housing and meeting an area's identified housing need. By extension MDD Policy CC02 and CS Policies CP9 and CP11 are also inconsistent with the Framework as they limit where development can go based on delivering the housing requirement in CS Policy CP17. Hence, this affects where the housing required to meet a higher level could potentially go.

16. The purposes of CS Policies CP9 and CP11 are to identify appropriate and sustainable areas for development that are well located for facilities and services, 2 CD10.2 and CD10.5 to protect the identity of settlements, and maintain the quality of the environment. These purposes are consistent with the aims of the Framework. ***However, despite recent Housing Delivery Test performances, the Council cannot currently demonstrate a five-year supply of deliverable housing sites. The latest agreed position is a supply of 1.7 years, which has decision-making consequences that I shall come to later, in that the most important policies for determining this application are deemed to be out of date.***

Sustainable location and local infrastructure

87. Given the site's location, the greatest range of facilities and services that future occupants would use on a day-to-day basis ***are at the upper end or beyond the distance that most people are prepared to walk or cycle to.*** *But, with the diversion of the number 3 bus route, together with the* ***provision of cycle parking for each dwelling and electric vehicle charge points (delivered through Building Regulations), future occupiers would be encouraged to travel by means other than the private car. The site is reasonably well placed for onward connections to central London, Reading and Gatwick Airport, among other places. Despite the scheme's spatial strategy conflict, the site is broadly in a sustainable location.***

Conclusion on Planning Balance

126. The planning system should be genuinely plan-led. The development plan directs development to suitable locations to enable growth as per the adopted spatial strategy to provide housing and address other economic, social, and environmental priorities. The Council has delivered against that plan, but the appeal is to be

judged on its own merits. ***The proposal would result in benefits and harms, and weighing the two is not a mathematical exercise, but the harms mean that the proposal conflicts with the development plan as a whole****.*

127. That said, the proposal would deliver either a policy-compliant level of affordable housing or a slightly sub-policy-compliant provision with a care home that is also needed. The affordable housing mix would provide a mix of tenures. ***The proposal would also not result in isolated homes in the countryside, as it would abut and extend the settlement of Wokingham. Its location, whilst not perfect, would provide future occupants with a choice of transport modes, and measures can be secured to encourage people to prioritise the use of sustainable transport modes. Further, safe and suitable access can be achieved for all, and the design of the accesses reflect current national guidance, and the development's significant impacts on highway safety, capacity and congestion can be mitigated where they arise.***

128. As I have explained, the proposal would provide different types and sizes of housing, and it would mitigate its effects on infrastructure and services, while it could be a well-designed, attractive, and healthy place that would be safe, accessible, functional, and include effective landscaping. *The area's character would not be maintained, but the proposal seeks to strike a balance between retaining that character and making an efficient use of land. This, together with the likely design of the scheme, leads me to consider that it does not conflict with Framework paragraph 139.*

129. Therefore, the adverse impact of granting permission would not significantly and demonstrably outweigh the collective benefits when assessed against the policies in the Framework taken as a whole. ***The proposal would accord with MDD Policy CC01, despite its wording reflecting a previous version of the Framework. Hence, the material considerations indicate in this case that planning permission should be determined other than in accordance with the development plan. I therefore conclude that the appeal should be allowed.***

Assessment of proposed development

AMOUNT OF NEW DEVELOPMENT:

The proposal is up to (*) 6 dwellings so it follows that if residential development is appropriate in principle on this site, then up to 9 dwellings would also be appropriate.

(*) If the Council consider that for some hitherto unforeseen reason that 6 houses would be too great a quantum the applicant is open to discussing with the Council what number of houses they would support.

It is envisaged that the dwellings would be two storey to tie in with the development in the vicinity.

This amount is in accordance with development plan policies on density and in character with the local context of other dwellings in the vicinity including the Park Home site to the east of Old Wokingham Road.

Siting of up to 6 dwellings here would not result in any harm to local character as the site is well screened on all sides and the site is set well back from the main road. The access is existing and so there will be no change to the streetscene. The site will generate additional vehicle movements along the access however these will not be significant in number, and it should also be noted that there has historically already been activity and a human presence at the site. The amount is acceptable.

The permitting of up to 6 houses will assist towards meeting the unmet need for dwellings within the Council's administrative area.

Design and Development Objectives:

Good quality design with siting, layout, scale, form and appearance absorbing the development in the landscape and respecting local vernacular.

Permission in principle criteria

The permission in principle consent route is an alternative way of obtaining planning permission for a housing-led development which separates the consideration of matters of principle for the proposed development from the technical detail of the development.

The permission in principle consent route has 2 stages: the first stage (or permission in principle/PiP stage) establishes whether a site is suitable in-principle, and the

second (technical details consent/ TDC) stage is when the detailed development proposals are assessed.

The Guidance https://www.gov.uk/guidance/permission-in-principle explains that the scope of PiP is limited to:

•Location,

•Land Use, and

•Amount.

The guidance explains that issues relevant to these 'in principle' matters should be considered at the PiP stage. Other matters should be considered at the TDC stage. It explains that Councils cannot list the information they require for PiP applications in the same way they can for applications for a planning permission. As a result, the applications are much simpler and straight forward.

A PiP cannot be used where an appropriate assessment is required.

Suitable mitigation and detail such as siting, number of dwellings and ecology can be secured at the TDC stage.

Design content, Amount, Layout and Scale justification:

In-depth dialogue with the clients, the architect and myself has culminated in a proposed up to 6 dwelling residential development to be laid out to provide separate amenity areas and respect privacy to the both the proposed and adjoining properties.

The proposed development will be constructed in good quality materials sympathetic to surrounding dwellings. The proposed windows will be timber framed albeit with sealed double-glazed units. The proposed arrangement of accommodation and curtilage retains and offers high levels of privacy. Any anticipated associated use / enjoyment of land surrounding the building within the dwellings' proposed residential curtilage would not materially harm the character and amenities of the area and would not conflict with the openness of the countryside.

The neighbouring properties will not be affected by the proposed development. The property is well screened to each of its boundaries. The proposed conversion will not cause overshadowing or overlooking.

The form of the development would **be appropriate development within countryside** and be absorbed within the landscape. The external appearance will be designed to respect the local vernacular.

The proposed residential development would maintain and enhance the rural character of the area. The development will be moderate in scale and will respect the form, rural character and local style of building of its immediate setting.

Policy considerations:

It is considered that the application will need to be assessed against the following policies. The proposed development suitably meets the requirements of each of the policies.

Local policies:

General Policy for New Development
Safeguarding Assets, Resources & the Environment
All new development will be expected to be of a high quality design. Development should integrate effectively with its surroundings, reinforcing local distinctiveness and landscape character. Innovative designs will be encouraged where appropriate.
Where the principle of the proposed new development – whether on a site that is previously developed or green field – is in accordance with other policies in the Development Plan, permission will be granted where the following matters are effectively addressed:

Design of Development

Character & layout: The proposal respects and contributes to the distinctive character, appearance and amenity of the area in which it is located

Built form: The proposal is in keeping with the prevailing landscape/streetscape, reflecting the variety of local building types by using complementary building materials and designs, and does not result in overdevelopment or unacceptable intensification by reason of scale, form, bulk, height, spacing, density and design. In the case of a residential extension, the proposal should not result in the creation of a terracing effect;

Parking: The proposal has regard to the adopted Parking Standards SPD (2012) or successor documents; maintains existing off-street parking spaces (including garages) where they are considered necessary to serve the existing buildings or use; and does not result in additional on-street parking where this would cause congestion or harm to amenity or highway safety;
Safeguarding Amenity - The proposal does not significantly harm the amenity of neighbouring properties by reason of pollution (noise, air or light), traffic, or other general disturbance;

Privacy: The proposal does not significantly harm the amenities and privacy of occupiers of neighbouring properties (including their private amenity space) by reason of overlooking or its overshadowing or overbearing effect.

Environment: The proposals provide a satisfactory environment for the occupiers of both the existing and new development;
Resource efficiency: The proposal promotes the use of sustainable design and construction

Landscaping: The proposal ensures that landscaping is an integral element in layout design, making provision for suitable new planting, trees and boundary treatments to enhance the appearance, character and amenity of the site from the outset. The

proposal is also expected to retain existing important features such as trees, hedgerows and walls wherever possible. Where a new road is required, a suitably hard and/or soft landscaped gap will be required between any existing properties and the new carriageway.

Interim statement on Climate Change / Sustainable House design:

To accord with Sustainable Construction, Renewable Energy and Energy Conservation principles and for their own future benefit the applicant is keen to make the proposed development very sustainable / 'future-proofed' due to the high cost of fossil fuels. The finished house(s) will be designed with high levels of insulation and as such far exceed the 10% renewables Policy requirement.

Materials Specification - The "Green Housing" specification guide - The choice of materials is intended to accord, wherever possible, with the Green Guide to housing specification with the use of an overall summary rating of A for the composition of the external walls, roof and glazing systems, etc in order to minimise environmental impact, the summary of the rating includes for longevity of material, recycled input, recycle ability, currently recycled and energy saved by recycling.

Insulation – The proposed development allows for large amounts of insulation – significantly higher levels than required by Building Regulations.

Timber - All timber to be used is to be sourced from suppliers affiliated to certified schemes such as Forest Stewardship Council, Canadian Standards Association, Sustainable Forest Initiative or the Programme for the Endorsement of Forest Certification etc.

Lighting - Use of compact fluorescent, low energy lighting throughout the extension including LED lighting where possible.

Windows - The Windows will be installed with double glazed low E coated sealed units.

Access and parking:

The existing access will be used. The traffic generated will remain compatible with the environmental character of the area and can be accommodated adequately on the surrounding road network.

Landscaping:

The site has a good mix of fencing, hedge and tree planting to its boundaries.

Conclusion:

The scheme suitably considers all Policy guidance, reflects its location both in scale and design and will not have a detrimental effect on the area.

The information submitted with the application shows that the proposed dwellings can be comfortably accommodated within the site. Matters such as appearance, visual impact on landscape, ecological impact and highways should not form part of the consideration of a Permission in Principle application and would be part of the Technical Details Consent stage.

The NPPF presumption in favour of sustainable development states where there are no relevant Development Plan policies, or the policies which are most important for determining the application are out-of-date (including for applications involving the provision of housing where a 5-year HLS cannot be demonstrated), planning permission should be granted unless (ii) any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF as a whole.

This report identifies that the proposal is in conflict with the development plan policies in respect of development in the countryside. This is by definition therefore an inappropriate location for new residential development. **The application is for up to 9 dwellings which could be delivered quickly and as such, consistent with recent allowed appeal decisions relating to unmet housing need, should be given significant weight towards meeting unmet housing need.**

The countryside location for this dwelling results in no adverse harm to character, the site is safe from flood risk and wildlife issues can be mitigated and resolved by conditions at the technical details stage. **The location is sustainable. It is not appropriate to refuse solely because a site lies in the countryside. Harm must be demonstrated, and this report identifies none.** Therefore, even though para 14 of the NPPF directs that the adverse impact of allowing development that conflicts with any planning or neighbourhood plan policies are likely to significantly and demonstrably outweigh the benefits, **no adverse impacts have been identified beyond the countryside location.**

There are therefore no reasons for the proposal not to be accepted at this stage.
In addition to the above the Framework acknowledges, that small sites can make an important contribution to meeting the housing requirements of an area which further supports this application. **The Council cannot demonstrate a 4 or 5 YHLS and therefore substantial weight should be applied to the development of this modest housing infill site.**

The proposed residential development would maintain the character of the countryside and will not have a materially greater impact than the present use on the openness of the countryside and the purposes of including land in it. Similarly, the associated uses

of land surrounding the buildings would not materially harm the character and amenities of the area and will not conflict with the openness of the countryside and the purposes of including land within it.

The proposed use and the form, bulk and general design of the buildings are in keeping with their surroundings. The proposed use is contained within the buildings including partial demolition and without extension or external storage, other than such provisions which can be made without any adverse effect on the building.

The proposed development will be carried out in a manner appropriate to the character of the building(s) and have no adverse impact on its surroundings.

Therefore, it is recommended that the application be approved.

Thank you in advance of your balanced consideration of the proposed application.

Please maintain a dialogue with myself and the applicants if you have any questions, concerns or matters that require further elaboration.