

TOWN & COUNTRY PLANNING ACT 1990

Planning Statement

Rolson House

London Road

Twyford

RG10 9HZ

Prepared for Saiyan Investments Ltd

February 2026

Document 1 v1

1 Introduction

- 1.1 This Planning Statement has been prepared by Loxley Group on behalf of Saiyan Investments Ltd ("the applicant") and accompanies a Section 73 application for the variation of Condition 2 on a previously approved planning application – reference 232561. Permission was granted by Wokingham Borough Council on 25th January 2024. The proposed development as set out in this S73 application maintains the same description as shown on the decision notice, "Full application for the proposed erection of two storey side extension to existing warehouse following demolition of the canopy roof structure and removal of storage containers"
- 1.2 The condition as set out in the decision notice states:
2. Approved details - This permission is in respect of the submitted application plans and drawings numbered 00 Rev.A and 2219-pl-01 received by the local planning authority on 16 October 2023, numbered 2219-pl-03 received on 24 October 2023, document titled 'Drainage Strategy' (RAB Consultants Limited, 27/10/2023) received on 30 October 2023 and drawing numbered SK-02 received on 16 January 2024. The development shall be carried out in accordance with the approved details unless other minor variations are agreed in writing after the date of this permission and before implementation with the Local Planning Authority
- 1.3 The previous planning permission approved proposals to replace an existing roof canopy structure and a number of shipping containers with a two storey side extension. At the time of the 2023 application the extent of the approved two-storey side extension was constrained by the footprint of the existing canopy and container structures it replaced. Subsequent revisions to the NPPF in December 2024, particularly in relation to Green Belt and grey belt policy, materially alter the policy context for development on previously developed land. This application therefore seeks a proportionate enlargement of the approved extension, supported by updated Green Belt and employment need evidence, together with revised lighting and drainage information.

Application Documentation

- 1.4 This statement is supported by the following documentation:
- 2219-pl-01 Proposed Floor Plan (approved under 232561)
- 2219-pl-02 Proposed Site Plan (approved under 232561)
- 2219-pl-03 Proposed Block Plan (approved under 232561)
- 2219-pl-04 Proposed Elevations (approved under 232561)
- 500-615-003-P_Proposed Site Plan-RevA
- 500-615-004-P_Proposed Part Ground Floor Plan-RevA
- 500-615-005-P_Proposed Elevations Sheet 1 of 2
- 500-615-006-P_Proposed Elevations Sheet 2 of 2

500-615-007-P_Proposed Cross Section A-A

P25031-DGC-Z1-REP-C-0001-P02 - Drainage Strategy Report

Lighting Assessment_03 Report

Lighting Assessment SK-01 REV_A Residential Receptor Location Plan

Lighting Assessment SK-02 REV_B Assessed Scheme of Lighting

Lighting Assessment SK-03 REV_B Light Spill

- 1.5 Also of relevance is the planning statement and Planning Officer report associated with the previous approval under 232561.

2 Site Description

- 2.1 The site is an almost rectangular shaped parcel of land measuring 2 acres. It is located on the eastern side of London Road on the outskirts of northern Twyford. Occupied by Rolson Tools; a leading hardware and DIY tool supplier, the property is currently in use as a distribution warehouse and storage facility with ancillary office space. The site is served by a single access off London Road and the building is situated centrally within its plot. A car park is located to the front and side of the building. The service yard can be found to the right hand side of the building. The southern elevation of the building contains large shutter doors enabling access between the yard and internal warehousing areas.
- 2.2 The service yard is occupied by a number of solid steel, double stacked shipping containers which provide additional B8 use class, storage facilities, a section of which is linked to the main warehouse building via a steel framed roof structure.



Figure 1: 3D Aerial view of the application site

3 Proposed Development

- 3.1 As noted above, the approved extension measured approx. 19.9m x 35m, adding approximately 696sqm of gross external floor area. The extension as proposed here would add a further 16m to its length whilst maintaining the same width of approximately 35m, adding approximately 543sqm in gross internal floor area.
- 3.2 The enlarged extension would have the same profile and be the same height as the approved extension (and existing building), and simply follow the roof form through to make it longer.
- 3.3 The proposed materials would match the existing building and approved extension. No other changes to the site are proposed.

4 Planning Policy Context

- 4.1 At a national level, planning policy is provided by the National Planning Policy Framework (NPPF) (December 2024) and Planning Practice Guidance (PPG).

National Planning Policy Framework (December 2024)

- 4.2 The National Planning Policy Framework (NPPF) stresses the importance of having a planning system that is genuinely plan-led. Where a proposal accords with an up-to-date development plan it should be approved without delay. The main premise of the NPPF is a presumption in favour of sustainable development (Paragraph 11).
- 4.3 Section 38(6) of the Planning and Compulsory Purchase Act 2004, together with Paragraph 2 of the NPPF, requires that planning applications for development be determined in accordance with the Development Plan unless other material considerations indicate otherwise. In this instance, the Development Plan comprises:

Wokingham Borough Development Plan

- 4.4 The Local Development Plan currently comprises:
- Wokingham Borough Core Strategy (January 2010)
 - Wokingham Borough Managing Development Delivery Local Plan (February 2014)
- 4.5 In terms of emerging local planning policy, the Council has submitted its Local Plan Update 2023-2040 for examination, with hearings due to begin in March 2026.

Section 73 Application

- 4.6 An approved planning permission remains valid until its time limit expires, allowing applications to amend it via Section 73 of the Town and Country Planning Act 1990. In this instance, planning application 232561 was granted by Wokingham Borough Council on 25th January 2024 and remains extant.
- 4.7 This application targets a single condition (condition 2) and does not alter the core development description. The development description of the original application remains unchanged. It is a matter of law that a Section 73 application must not result in a conflict with the description of development. As the description for application 232561 contains no restrictive parameters regarding floor area, volume, or size (width or length), the proposed enlargement is entirely consistent with the wording of the existing permission as the proposed development would continue to be “two storey”, the only stipulation in the condition on size.
- 4.8 The proposal does not constitute a fundamental change to the original permission. The use class, building height, roof profile, and material palette remain identical to the approved scheme and the enlargement of the footprint does not alter the essential nature of the development - a warehouse extension.
- 4.9 The revision of national policy in the December 2024 NPPF, specifically the introduction of the 'grey belt' exception and approach to development on previously developed land in the green belt, serves as the primary material consideration justifying the variation of Condition 2. This policy shift has removed the previous 'harm' thresholds that constrained the original application as noted in Paragraph 1.4. The principle of a two-storey side extension in this location has already been

established and found compliant. This S73 application simply seeks to optimise that established principle in light of the updated NPPF.

- 4.10 As set out in the supporting reports, the conclusions of the Lighting, Drainage, and other reports evidence, remain consistent with the original reports and therefore, the enlargement does not pose or trigger or new significant impacts.

5 Key Planning Considerations

- 5.1 This section now provides a detailed assessment of the key considerations with respect to the application and assesses the planning balance of the proposed development.
- 5.2 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these are expected to be applied. It is a material consideration in formulating local planning policies and taking decisions on planning applications.
- 5.3 Paragraph 11 of the NPPF outlines the objectives with regards to the presumption in favour of sustainable development where development proposals must accord with adopted development plans. Paragraph 119 states that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses.
- 5.4 The application site is previously developed land (in its entirety) but falls within the Green Belt.
- 5.5 In terms of development affecting the Green Belt, Paragraph 153 of the NPPF states:

*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 *55. 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.*

*Footnote *55 states Other than in the case of development on previously developed land or grey belt land, where development is not inappropriate.*

According to Paragraph 154:

Development in the Green Belt is inappropriate unless one of the following exceptions applies:

- 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) 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;*
- c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;*

- d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;*
- e) limited infilling in villages;*
- f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and*
- g) limited infilling or the partial or complete redevelopment of previously developed land (including a material change of use to residential or mixed use including residential), whether redundant or in continuing use (excluding temporary buildings), which would not cause substantial harm to the openness of the Green Belt*
- h) Other forms of development provided they preserve its openness and do not conflict with the purposes of including land within it. These are:*
 - i. mineral extraction;*
 - ii. engineering operations;*
 - iii. local transport infrastructure which can demonstrate a requirement for a Green Belt location;*
 - iv. the re-use of buildings provided that the buildings are of permanent and substantial construction;*
 - v. material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds); and*
 - vi. development, including buildings, brought forward under a Community Right to Build Order or Neighbourhood Development Order*

5.6 In addition to the above, the NPPF (as amended in December 2024), introduces the concept of “grey belt” land. Paragraph 155 states:

The development of homes, commercial and other development in the Green Belt should also not be regarded as inappropriate where all the following apply:

- a. The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;*
- b. There is a demonstrable unmet need for the type of development proposed⁵⁶;*
- c. The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework ⁵⁷; and*
- d. Where applicable the development proposed meets the ‘Golden Rules’ requirements set out in paragraphs 156-157 below.*

5.7 Given the changes to national green belt policy, Local Plan Policies CP12 and TB01 are somewhat out of date as these policies are to reflect the principles of the NPPF relating to development in the green belt. The previous proposal was able to demonstrate compliance with the green belt policies at the time and we contend that the enlarged extension remains compliant given the updated NPPF position.

- 5.8 Paragraph 153 of the NPPF confirms that inappropriate development in the Green Belt remains, by definition, harmful and should not be approved except in very special circumstances, and that substantial weight must be given to any harm to the Green Belt, including harm to its openness. The new footnote 55 clarifies that, where a proposal on previously developed land or on grey belt land is properly regarded as not inappropriate development, that development is excluded from the specific policy requirement to give substantial weight to such harm. In this case the proposal falls within paragraph 154(g) as the limited redevelopment of previously developed land which would not cause substantial harm to openness, such that it is not inappropriate development for the purposes of paragraph 153.
- 5.11 Notwithstanding this, if one were to consider that the land is “grey belt” land, Paragraph 155 and its criteria can also be met.
- 5.12 The criteria A – C would be relevant. Part D concerns residential development. A comment for each can be found below.
- a. The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;*
- b. There is a demonstrable unmet need for the type of development proposed *56;*
- c. The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework *57;*
- 5.13 The site is a large entirely developed (sealed surface) site, comprising a large warehouse building, parking and servicing areas. The application is located on the eastern side of the London Road and is self contained. The rear boundary of the site forms part of the well defined boundary to the developed area of a number of properties in the vicinity. The proposed extension would not encroach upon or occupy any greenfield land to the rear. Furthermore, when viewed externally, the extension would simply sit in front of or behind existing built form and would be unremarkable given the context of the application site and its immediate surroundings. The Planning Officer’s report for 232561 records that the existing built form is visible from London Road, the bridleway and wider rural viewpoints. The enlarged extension would remain read against that established backdrop and additional impact would be limited. It would also occupy the land that is already occupied by shipping containers (stacked) which appear as built form.



Figure 2: Developed area on London Road

- 5.14 The site makes a negligible contribution to the purposes set out in Paragraph 143; specifically, it does not facilitate urban sprawl given the application site's enclosed nature. The application site does not contribute to safeguarding the countryside from encroachment due to its existing sealed surface and previously developed nature. Nor does it threaten the gap between Twyford and Hare Hatch, thus satisfying the 'grey belt' definition in the Annex 2 Glossary.
- 5.15 In terms of part b of Paragraph 155, the need for the development was already stressed in the original application and the acute need for developments of the type proposed were accepted at the time, and remain valid. We would argue that the development of a brownfield site such as this is better than greenfield development for the same; there have been numerous examples of warehousing type developments coming forward under the new NPPF which occupy lower performing greenfield, green belt land and permitted on the basis that the need is substantial across the country.
- 5.16 The need is no different here and although the justification was set out in the original application, Wokingham Borough Council continues to identify a growing need for B8 warehouse storage and distribution space since 2020, driven by economic shifts like e-commerce expansion and logistics demands, as detailed in updated employment studies. The Wokingham Borough Local Plan Update Topic Paper on Employment (September 2024) identifies a net need for 24,741 sqm of additional industrial floorspace (B1c/B2/B8) to 2040, derived from the ELNS Tables 5.7 and 5.15 and reflecting low vacancy, high job densities and limited historic losses. Within that overall figure there is a pronounced undersupply of modern logistics and warehouse space, including B8, relative to market demand. Historically, the area had not attracted B8 users compared with nearby Slough

or Heathrow due to those markets' stronger logistics clusters, but with those areas nearing capacity there's evidence of expanding search patterns into Wokingham/Thames Valley.

- 5.17 Other illustrative reports on the state of the B8 warehouse and storage distribution market confirms an overall shortfall nationally, with a research note from real estate analyst CoStar Group, calculating that industrial and logistics construction starts fell to a 10-year low in 2024, which when accounting for new completions has the potential to generate only a 1.4 years worth of supply ¹. Knight Frank assess that online retail is set to grow by 29.1% over the next five years, with ecommerce alone set to create requirements for warehousing space totalling 4.2 million sqm of warehousing space requirements.²
- 5.18 In summary, the Employment Topic Paper and associated evidence identifies a structural undersupply of industrial and logistics space locally and limited committed supply. That position aligns with wider market analysis indicating constrained national pipeline for industrial/logistics floorspace and rising e-commerce driven requirements. Given Green Belt and flood risk constraints in the Borough, the Council's evidence recognises that intensification and expansion of existing employment sites will be critical to meeting these needs over the plan period. The proposed extension is modest but proportionate to, and clearly aligned with, the identified need.
- 5.19 Having regard to part c, as a previously developed site already in use as a warehouse and storage facility, the proposal represents a sustainable development as it benefits from the existing infrastructure already present at the site. This includes safe and suitable access, sufficient parking and the possibility for other sustainable transport modes (cycling). As a result, the proposed development would not conflict with paragraphs 110 or 115.
- 5.20 Policy CP11 of the Core Strategy states that development will not normally be permitted unless it meets the following exceptions:
- 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;*
- 5.21 Policy CP15 permits business, industry or warehousing in Core Employment Areas only although minor extensions of existing uses are acceptable in principle where they are within settlement limits. Policy TB11 of the MDD Local Plan also aims to direct employment growth in Core Employment

¹ <https://www.logisticsmatters.co.uk/news/warehouse-shortage-on-the-horizon/>

² <https://realassetinsight.com/2023/07/17/uk-faces-warehouse-supply-crisis-as-60-likely-obsolete/>

Areas. Although the application site is outside of a core employment area and settlement limits, the National Planning Policy Framework has an overriding emphasis for building on a strong, competitive economy. In accordance with Paragraph 85, the Council is required to afford significant weight to the need to support economic productivity and allow existing businesses to expand, a material consideration. Paragraph 88 of the NPPF notes that planning policies should enable the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well designed new buildings.

- 5.22 The Planning Officers Report for application 232561 considers the previous applications' compliance with Policy CP11 and TB11 alongside the NPPF, with the officer concluding that a development of the type proposed and in this location would not conflict with Local Plan policy. In light of this, it would be unreasonable to arrive at an alternative conclusion.

Other Material Considerations

- 5.23 As before, the scheme makes use of the existing site access at the southern end of the site. The proposed development does not change the vehicular movements within the site. As a result, the turning of lorries within the site remains unchanged and all vehicles can continue to manoeuvre within the site safely and enter and exit via the existing access in a forward facing gear.
- 5.24 Despite the application proposing a larger extension than that previously approved, the existing parking provision is significantly greater than the actual requirement. We are informed that up to 20 spaces are occupied at any one time on a typical working day, well below the existing available provision. The development is therefore considered to remain compliant with Policy CP6 and CC07.
- 5.25 It is also not considered that there will be any additional noise impacts arising from the development. As noted above, the proposals do not alter the positions of vehicular movements and therefore, no additional noise impact would arise from the movement of traffic. Policy CP3 continues to be met.
- 5.26 The site is located within a Flood Zone 1. A drainage strategy was prepared by RAB Consultants for the original planning application. Subsequent discussions have taken place between DGC drainage engineers and the LLFA who have agreed an alternative solution following further site investigations. The submitted information therefore reflects these conversations. Again, Policies CC09 and CC10 remain met.
- 5.27 Given the increase in length, a cross section has been prepared to show the relationship of the extension to the residential dwellings which front London Road. The section shows that the 25 degree angles are not breached and therefore, their amenity in terms of sunlight/daylight would not be impacted by the enlarged extension.
- 5.28 In addition, the design theme of the extension including the material palette is to follow through and therefore the overall character and appearance of the extension would remain the same as previously approved.
- 5.29 The lighting assessment has been updated to reflect the larger size. Drawing SK02 Rev B refers.

6 Conclusion

- 6.1 This Planning Statement accompanies a Section 73 application to vary Condition 2 of Planning Permission 232561, granted 25th January 2024. The proposal is aligned with the original development description.
- 6.2 The condition refers to architectural drawings, drainage strategy and external lighting assessment. New information is submitted which is intended to supersede the documents listed in the condition, if planning permission is forthcoming.
- 6.3 Given the nature of the proposals and as demonstrated by the evidence previously submitted, the development remains policy compliant in respect of highways, noise, ecology, trees and impact on neighbouring amenity.
- 6.4 The updated NPPF has created the conditions for additional development in the Green Belt, in particular through a clearer intention to promote brownfield (previously developed land) for development, and through the introduction of the Grey Belt which is defined as land in the green belt comprising previously developed land and any other parcels and/or areas of green belt land that make a limited contribution to the five green belt purposes.
- 6.5 The application site is previously developed land and thus development would not be inappropriate according to Paragraph 153 and 154 of the NPPF.
- 6.6 For decision-making purposes, the site could also fall within the NPPF glossary concept of 'grey belt', comprising previously developed land that does not strongly contribute to purposes (a), (b) or (d) in paragraph 143. The site is wholly hard-surfaced and occupied by an established warehouse, parking and servicing areas; it is physically and visually contained by existing built form and boundaries and does not assist in separating Twyford from Hare Hatch nor in safeguarding open countryside beyond the developed edge. While the ultimate classification is a matter for the local planning authority, when taken together with the acknowledged B8 need, the evidence demonstrates that the proposal is consistent with the 'grey belt' concept.
- 6.7 At paragraph 7, the NPPF explicitly states that the purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes, commercial development and supporting infrastructure in a sustainable manner. The proposed development makes effective use of previously developed land on which a B8 facility already exists, with an extension already approved. The proposal would not undermine the intentions of National or Local planning policy for a development of this type, and in this location. We therefore request that the Council approve the variation to the condition as proposed.

