

PLANNING REF : 261859
PROPERTY ADDRESS : Woodbury
: Jouldings Lane, Farley Hill, Berks
: RG7 1UR
SUBMITTED BY : Ms Joanne Mainers
DATE SUBMITTED : 21/09/2026

COMMENTS:

I strongly object to this applicant, as it is seeking to more than double the scale of this development, despite unresolved questions about whether the existing site is operating in accordance with its holiday-use restrictions. The current pattern of occupation must be properly investigated and established before it can reasonably be relied upon as justification for further growth. Until the Council has verified compliance with Conditions 8 and 9 of permission 231960, approving an additional nine caravans would be premature and would risk substantially intensifying a use that may already exceed the limits originally considered acceptable.

The existing permission is tightly restricted. Permission 231960 was granted for holiday use only. Condition 8 states that the development must not be occupied for more than 28 days per annum without the Council's written permission and must never be used as any person's primary or permanent residential accommodation. Condition 9 requires an up-to-date register of occupiers and their permanent residential addresses to be maintained and made available to the Council for inspection.

The applicant then sought to vary Condition 8 through application 251246 to allow longer short-term lets. The Council refused that request on 11 July 2025 for three clear reasons: unacceptable development outside settlement limits, harm from increased activity and semi-permanent occupation to the countryside and Area of Special Character, and the site's unsustainable location. Those conclusions are directly relevant to an application that would now more than double the number of caravans.

The applicant's own evidence requires investigation as local observation is that units are occupied overnight throughout the year and that numerous cars and commercial vans are regularly present. More importantly, the applicant's own Appendix 1 contains booking sheets for all eight units from September 2025 to July 2026. They show most units marked 'Booked' for most weeks across eleven consecutive months, and each sheet says that each home is issued under a 28-day licence.

A sequence of 28-day licences does not itself prove holiday use. Nor does it answer whether the same individuals are staying through consecutive licences, whether occupants retain genuine permanent homes elsewhere, or whether the overall occupation complies with the express 28-day restriction. The booking sheets appear to demonstrate near-continuous operation rather than occasional holiday occupation and therefore require proper investigation, including inspection of the Condition 9 register and supporting permanent-address information.

The current application seeks to rely on this high level of bookings as evidence of business demand. The Council should not treat activity that may be outside the terms of the existing permission as a lawful baseline or as justification for expansion. Government planning guidance states that effective enforcement is important to

protect amenity, maintain the integrity of decision-making and sustain public confidence. Current NPPF Policy DM8 also requires the impact and acceptability of unauthorised development to be considered when enforcement action is assessed.

Further conditions would not answer the problem and the history demonstrates why simply repeating a holiday-use condition would not be sufficient. The Council already imposed Conditions 8 and 9 because permanent or unrestricted occupation would be unacceptable here. The subsequent Section 73 refusal confirmed that planning harm. If those controls have not been monitored or complied with, expanding the operation to 17 units would multiply the difficulty and the harm.

Before determining this application, the Council should inspect the complete occupancy register, establish the identity and permanent address of occupiers, compare stays across consecutive licence periods and publish a reasoned conclusion on compliance. If a breach is identified, the Council should consider proportionate enforcement action independently of this application. It should not postpone the issue or assume that a new permission will cure existing non-compliance.

The submitted evidence is internally inconsistent as there are significant inconsistencies in the application documents. The Planning Statement and proposal describe 17 caravans in total and an increase from 8, while the Sustainable Drainage Assessment describes 18 static caravans and says that only five pitches currently exist. The Planning Statement's transport section also compares the proposal against a five-pitch site. These are not minor drafting points: the correct baseline and development quantum determine traffic, drainage, foul-water, servicing, landscape and amenity impacts.

The foul-water proposal is a cesspool requiring periodic emptying by tanker, yet the layout says its size is to be confirmed and the frequency of emptying is not clearly tied to a verified maximum occupancy. A scheme for 17 caravans operating at the high occupancy shown in the booking records needs a consistent and evidenced assessment of population, wastewater capacity, tanker frequency, parking, refuse and vehicle movements.

The application attempts to use the existing operation as proof that expansion is appropriate, while the same evidence raises serious questions about compliance with the conditions that made the original permission acceptable. Combined with the previous refusal to relax Condition 8 and the inconsistent development figures, there is no sound basis for granting a further nine caravans. I ask the Council to refuse the application and to investigate compliance with Conditions 8 and 9 of permission 231960 without delay.