

Boyer

LONG BARN, WARREN
FARM, FOREST ROAD,
BINFIELD RG40 5QY

Planning Statement

REPORT CONTROL

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1. INTRODUCTION

1.1 This Planning Statement has been prepared by Boyer, on behalf of Ashridge Wokingham Ltd (the Applicants). This Statement is submitted to Wokingham Borough Council (WBC) in support of a Retrospective Planning Application submitted in Full in respect of premises known as the Long Barn, which is situated at Warren Farm, Forest Road, Binfield, Berkshire RG40 5QY.

1.2 The Description of Development as set out on the application form, is as follows:

“Full planning application for the change of use of a former agricultural barn (216 sq.m) to provide 4 units of occupation for B8 (Storage or Distribution) (Retrospective)”.

1.3 Accompanying Documentation

1.4 The documents and drawings which accompany this planning application are set out below, and in the accompanying covering letter.

- Location Plan
- Floor Plan
- Elevations
- Transport Technical Note - Motion
- Planning Statement

2. SITE SURROUNDINGS

- 2.1 The subject site is one of a number of buildings situated within Warren Farm, which is bounded to its north by the M4 and to the south by Forest Road (B3034). The agricultural holding of Warren Farm comprises approximately 20 hectares of land which continues in use for agricultural purposes. The subject buildings were previously used for storage in relation to the previous owners agricultural/residential and commercial businesses all of which were operated from Warren Farm.
- 2.2 The building(s) the subject of this application is comprised as part of a “U- shaped” former agricultural barn, with a timber frame and corrugated cladding and incorporating a brick plinth which “runs around” the base of the building. The building comprises four self-contained units with access to each of the units through a series of doors in the front elevation of the subject building. Each of the units is approximately 60 square metres in area.
- 2.3 The Long Barn is located to the very north of the wider Warren Farm site, within a cluster of buildings (see Site Location Plan). To the west of the subject barn are a number of buildings which are all in commercial use, which include training and storage uses and which includes a fencing supplier.
- 2.4 Access to the Long Barn is gained from Forest Road, along a private road which services the lawfully used industrial/commercial uses that are situated on the wider Warren Farm site, in addition within this mixed-use site there are two residential dwellings. The Long Barn is accessed through secure electric gates and is in effect, therefore, situated in a compound.
- 2.5 The Warren Farm site also includes the slab bases of 2 residential dwellings, which have been constructed to oversite level, this development is located to the east of The Long Barn and is situated more in the open countryside on the eastern side of Warren Farm; this planning permission remains extant and the dwellings, therefore, capable of completion.
- 2.6 Over the years Warren Farm, has evolved from a farming use and to a site which comprises a significant commercial development in the countryside, it is also a fact, that there is residential development in situ within the complex of buildings at Warren Farm.
- 2.7 In common with many farms in the locality, there is now limited agricultural activity and where it does occur it is mainly cropping and therefore passive in character with little obvious activity.

3. POLICY

- 3.1 There are a number of policy imperatives against which the proposed development falls to be considered. These are contained as follows:
- National Planning Policy Framework (NPPF) (Feb 2025)
 - Core Strategy 2010 (CS)
 - Managing Development Delivery Local Plan 2014 (MDD Local Plan)
 - Emerging Wokingham Borough Local Plan Update 2023 – 2040 Proposed Submission Plan
 - National Planning Policy Guidance (NPPG)
 - Borough Design Guide Supplementary Planning Document 2012
- 3.2 The Application Site is identified on the proposals map, as defined in the adopted Core Strategy and Managing Development Delivery DPD. as being situated within the open countryside. The relevant policies in respect of the Core Strategy are as follows:
- CP1 The generic policy relating to sustainable development.
 - CP3 The general principles of development and relates especially to (1) the scale and form of development, along with the impact on amenity; and (3) the impact on the wider landscape, along with flora and fauna.
 - CP11 The contribution to rural enterprise outside of the development limits the avoidance of encroachment away from the buildings; and those replacement buildings which would bring about environmental improvements.
- 3.3 The Adopted Managing Development Delivery DPD, contains the following relevant policies:
- CC01 The presumption in favour of sustainable development complies with the National Planning Policy Framework approach, in particular the statement that where policies comply with policies of the development plan, they will be granted without delay; and where the plan is silent, the presumption in favour will be applied.
 - CC06 The assessment of noise impacts of development.
 - CC07 The demonstration that parking standards are complied with.
 - TB21 That the development would not harm the landscape character of the area.
- 3.4 It is a material fact that the adopted Development Plans comprised within Council's Policy framework predates the current NPPF, the latest version of which, was issued in December 2024 (and amended in February 2025).

- 3.5 In paragraph 232 of the Framework, it is stated “that existing policies should not be considered out-of-date simply because they were adopted or made prior to the publication of this Framework. Due weight should be given to them, according to their degree of consistency with this Framework (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given.”
- 3.6 The National Planning Policy Framework (NPPF) has an underlying presumption in favour of sustainable development which is carried through to the local Development Plans. 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. To this extent there is consistency between the Local Development plan and the NPPF.
- 3.7 As set out paragraph 3.2, the application site is designated within the Countryside. Paragraph 180 b) of the NPPF recognises the intrinsic character and beauty of the countryside and states that decisions should contribute to and enhance the natural and local environment.
- 3.8 Paragraph 88a) of the NPPF states that planning policies and decisions should enable the sustainable growth and expansion of all types of business in rural areas through conversion of existing buildings and well-designed new buildings.
- 3.9 Policy 89 of the NPPF states that
- “Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.”*
- 3.10 Paragraph 49 of the NPPF states:
- “Local planning authorities may give weight to relevant policies in emerging plans according to:*
- a. the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given).*
 - b. the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and*
 - c. the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).”*

- 3.11 Accordingly, emerging policy can be a material consideration and can be given weight in the determination of applications for development. In this context the relevance of the emerging local plan, the consistency of the existing development plan with the NPPF all fall to be considered in the planning balance.
- 3.12 The Emerging Local Plan has been submitted for examination and is therefore at an advanced stage of preparation. Secondly, for the reasons set out in the following narrative the policies of Emerging Local Plan are more closely aligned with the current NPPF than those of the 2010 Adopted Core Strategy and the 2014 Adopted Management Delivery Plan.
- 3.13 In so far as the policies of the Emerging Local Plan are concerned Policy SS5 in 2(e) supports *“The re-use (or conversion) of existing buildings permanent and substantial construction which would not require extensive reconstruction; in (f) of the same policy criterion, the following is identified as a development proposal that is seen as acceptable; Namely, “The replacement, extension or alteration (including sub-division) of existing buildings of permanent and substantial construction, and which do not lead to disproportionate increases in scale, form or footprint beyond the original building”.*
- 3.14 The policy carries forward the policy background that “The countryside, as shown on the Policies Map, will be recognised for its intrinsic character and beauty, and the wider benefits from natural capital and ecosystem services, in accordance with national policy.” To this end it is consistent with the policy guidance set out in the NPPF
- 3.15 The narrative accompanying Policy SS5 requires that:
- “Any proposed development will need to be of a scale, nature and location within the countryside that is appropriate to the locality with regard to the use that is proposed, for example its location is justified by means of proximity to existing established uses or natural features. Where this is achieved, development will also be required to minimise its impact upon the character and appearance of the area. They should be of an appropriate scale, design and materials having regard to the locality (for example location within the site, scale in relation to plot size, and in relation to existing/nearby development). **The re-use of existing buildings within the site is expected to be prioritised before proposals for new buildings.**” [my emphasis]*
- 3.16 Section 3 of the policy SS5 provides a landscape led approach which sets out a number of criteria all of which seek to meet the objective of protecting the intrinsic quality and beauty of the countryside.
- 3.17 Notably, *“Policy ER3: Supporting the rural economy: rural employment sites are not protected through a designation; they will be too numerous and small scale (<500 sq. m) for that. However, small scale development within the countryside for rural businesses, including live work will be supported where a number of criteria are met including it is contained in an existing building or new build that is proportionate and respects the character and setting.”*

- 3.18 Paragraph 2.23 of the Emerging Local plan describes the rural economy in the following terms: *“The rural economy includes traditional industries such as agriculture, alongside leisure, industrial and other businesses.”* This is a wider recognition of the uses that can be comprised within the rural economy, compared to the adopted core strategy and is consistent with the approach of the current NPPF.
- 3.19 This approach to rural development in the emerging Local Plan represents a change of direction by the Local Planning Authority, to this extent the emerging Local plan indicates the positive thrust of the Local Planning Authorities policy on growth and employment, recognising the current advice set out in the NPPF.
- 3.20 This approach of paragraph 89 is replicated in the draft consultation of the NPPF (December 2025), in E4 Rural Business Development where support is encouraged through the conversion of Existing Buildings, and as with the current NPPF in E4 2 recognises that:
- “Development proposals to meet business needs in rural areas may need to be located outside settlements, and in locations that are not well served by public transport. In these circumstances:*
- a. Development proposals should take opportunities, where they exist, to use previously developed land, and sites that are physically well-related to existing development; and*
 - b. The siting and design of development should be appropriate having regard to the character of its surroundings.”*
- 3.21 National Planning Policy Guidance (NPPG) emphasises that economic need should be based on robust evidence to understand existing business needs, more importantly such policy should be kept under review to reflect local circumstances and market conditions. National economic trends may not automatically translate to particular areas with a distinct employment base. The Paragraph 025 Reference ID: 2a-025-20190220, suggests that the Annual Monitoring Report and plan review process can ensure the evidence remain up to date.
- 3.22 The most recent Monitoring Report available covers the period 1 April 2020 to 31 March 2021, however the plan review process, culminating in the publication of the Emerging Local Plan which is based on a more upto date evidence base, on which a policy imperative can be predicated. The resulting policies set out in the emerging plan reflect the approach set out in the NPPF and amplified in the NPPG.
- 3.23 Borough Design Guide Supplementary Planning Document 2012. Section 8 of the guide provides advice for the design of development in rural areas. The emphasis is to maintain the quality of the environment outside settlement boundaries by ensuring that development does not excessively encroach upon countryside or expanding development; would not result in inappropriate increases in the scale, form or footprint of the original building; or bringing about environmental improvement; and would be being contained within suitably located buildings that are appropriate for conversion.

4. SITE HISTORY

- 4.1 The wider Warren Farm site has been the subject of numerous applications the most relevant are detailed in table 1 as follows:

Reference Number	Proposal	Decision and Date
F/2010/0702 APP/X0360/A/ 10/2137105	Change of use of former agricultural buildings to B2 general industrial/ B8 storage and distribution use with associated parking storage and landscaping (retrospective). (Buildings B and C)	Appeal Allowed 09.08.2011
F/2011/2413	Retrospective retention of barn for agricultural storage in association with warren Farm (Building A) –Master Tech in occupation from 1 April 2012	Approved 21.05.2012
CLE/2012/1339	Lawful use of the farm house as 2 independent dwellings	Granted 17.01.2013
F/2014/0351	Erection of 2no replacement dwellings following demolition and removal of existing dwellings.	Appeal Allowed 23.12.2014
F/2014/2845	Erection of single storey extension to B8 building to accommodate an ancillary trade counter (Building B)	Conditional approval 26.03.2015
F/2015/0822	Erection of extension to building B, retention of open storage area and implementation of landscaping (part retrospective)	Approved 25.06.2015
183150	Application for agricultural prior determination for change of use of agricultural buildings to 3no residential dwellings	Refused on 30.01.2019

- 4.2 As referenced above the overall site, including the application site has been the subject of a number of planning applications. The applications cited are considered relevant in the context of the current development.

5. THE DEVELOPMENT

- 5.1 This development has been the subject of a pre-application submission and response. This retrospective planning application relates to the use of the Long Barn, as four separate units of storage floorspace which have been and continue to be used for B8 storage purposes. The total amount of floorspace involved is 280 sq.m. The size of each unit is approximately 70 sq.m and the nature of the storage use is in consequence small scale.
- 5.2 The units to which this application relates are occupied for storage purposes by small business operators, who have been previously displaced from sites within the Borough by the redevelopment of their previous premises and who as a last resort found storage accommodation in the Long Barn at Warren Farm. The tenants are locally based.
- 5.3 The NPPF, planning law requires that applications for planning permission fall to be considered in accordance with the development plan, additionally the National Planning Policy Framework must be taken into account in preparing the policies of the development plan and if a plan is out of date, is a material consideration in making planning decisions.

Policy Context

- 5.4 As set out in the preceding narrative the Development Plan is the starting point for the decision maker. In this instance it comprises the Managing Development Delivery Local Plan, Core Strategy and Central and East Berkshire Joint Minerals and Waste Plan.
- 5.5 There are also supporting supplementary planning documents such as the Wokingham Borough Design Guide and, Affordable Housing SPD. These policy documents are underpinned by the National Planning Policy framework (the NPPF) which constitutes policy and the National Planning Practice Guidance (PPG), which following the judgement in the case of *Mead .v. Secretary of State Case No: CA-2024-000466* established the premise that the PPG is interpretive of the policies of the NPPF.
- 5.6 It is also a fact that the Framework does not change the statutory status of the development plan as the starting point for decision making but it is a material consideration in the determination of a planning application. To this extent if the policy imperative set out in the NPPF, is more up to date than the Development Plan in force, then the policies of the Framework should be preferred as a means of providing policy guidance.
- 5.7 In this context when reconciled against current policies, and having regard to the site history, it is submitted that the principle of the use of the premises for storage is consistent with policies for the re-use of buildings in the context of at both national and local levels, all of which promote the re-use of rural buildings. Additionally, there is the matter of the well-established commercial development evidenced at Warren Farm.
- 5.8 The acceptability, or otherwise of the re-use of buildings at Warren Farm, has, as raised in the pre-application response and in historic decisions, related to whether the site is in a suitable location for the proposed use, having regard to its accessibility and secondly, the effect of the development on the character and appearance of the area

Principle of Development

- 5.9 The relevant criteria of Policy CP11 which should be taken into consideration in this case are: 1) where the proposal *“contributes to diverse and sustainable rural enterprises within the borough”, 2) it would 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;”*
- 5.10 The application of Policy CP11 Criteria 1 should also be viewed in the context and against the more up to date advice provided in the Framework and the Emerging Local Plan (which embraces the up-to-date advice of the NPPF).
- 5.11 The Framework sets out in paragraphs 85, 87, 88 and 89 the policy background for economic development and growth of the economy. In particular paragraph 85 states that planning policies and decisions should help create the conditions in which businesses can invest, expand, and adapt. **Significant weight** should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.
- 5.12 Paragraph 87 requires that policies and decisions should both recognise and address specific locational requirements. In particular criteria b makes reference to storage and distribution operations at *“a variety of scales and in suitably accessible locations”* that allow for the efficient and reliable handling of goods.
- 5.13 Paragraph 88a) of the NPPF *encourages “the sustainable growth and expansion of all types of business in rural areas”*. In reality a diverse and sustainable rural enterprise is one that diversifies the rural economy beyond its traditional base, demonstrates long-term financial viability, supports the social fabric of the local community, and operates in an environmentally sensitive manner that respects the character of the countryside and delivers ecological benefits.
- 5.14 Paragraph 89 (recited in Para 3.9) addresses more directly the matter of sustainability. It is recognised that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements. These may be in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads.
- 5.15 It is accepted, therefore in the NPPF that subject to a development being (a) sensitive to its surroundings, and (b) not having an unacceptable impact on local roads, then such development may be considered acceptable in this respect and can be accommodated in rural locations.
- 5.16 The Emerging Local Plan recognises the need for consistency with the NPPF and Policy SS5 states the categories of development in the countryside that in general can be supported. Categories e) and f) will generally be supported, these relate in the case of the former to the re-use or conversion of existing buildings of permanent and substantial construction, which

do not require extensive reconstruction, such an approach will create the conditions for growth and will meet need.

- 5.17 In the case of the latter this allows for the replacement, extension, or alteration (including sub-division) of existing buildings of permanent and substantial construction, and which do not lead to disproportionate increases in scale, form, or footprint beyond the original building.
- 5.18 In consequence the policy set out in paragraph 89 of the NPPF recognises that development, to meet local business needs may have to be located in less than sustainable locations. The Emerging Local Plan is consistent with this as an approach, whereas the 2010 Core Strategy is inconsistent with this approach.
- 5.19 The up-to-date policy in the NPPF and the policy framework in the emerging Local plan both recognise that to facilitate growth and to meet local needs there is a need for flexibility in the approach to development in rural areas.
- 5.20 Policy CP11 in criteria 1 is therefore superseded by the more up to date advice set out in the NPPF and echoed by emerging Policy SS5, which in the case of the latter is a proactive worded policy, encouraging development.
- 5.21 Policy SS5 e) is a reflection of criterion 2 and 3 of Policy CP11, namely the proposed use, which would utilise an existing building on site, meaning there would be no expansion of development and there would, therefore, be no discernible visual impact on the landscape character of the area. The majority of the parking is contained within the existing building group, and the entrances to the units, in consequence the servicing is similarly contained. The development therefore accords with criteria 2.
- 5.22 The preapplication advice relies on the application of Policy CP11 but is silent on the policy guidance in the NPPF, nor is there any recognition of the policy direction of the Emerging Local Plan. It is submitted that the more up to date policy imperative should be preferred in the consideration and determination of the proposals the subject of this application.
- 5.23 Significantly part of the evidence base informing the emerging local Plan, the Wokingham Borough – Employment Land Needs Review (March 2023) in its analysis recognises *“that there is strong demand for industrial space (especially for micro, **small**, large and strategic scale units) across the Borough, from a variety of sectors.”*

Countryside

- 5.24 It is not in dispute that the application site is located in the Countryside. However as set out in the preceding text (paragraphs 5.9 – 5.23), the development the subject of this application relates to the use of existing buildings situated within an established complex of buildings. The policy imperative seeks to ensure that the openness of the countryside is not compromised. The matter of the principle of development is concurrent with the site’s countryside location.
- 5.25 Accordingly, given the circumstances in respect of the re- use of an existing building, the buildings would not offend the criteria/test in policy SS5 of the emerging Local Plan and CP11 of the 2010 Adopted Core Strategy.

- 5.26 Notwithstanding the policy guidance set out in the NPPF and aligned in the emerging Policy, the pre-app response, nevertheless cites that the tests in the Policy should be taken into consideration. The development is considered against the tests in the following narrative.
- the proposal contributes to diverse and sustainable rural enterprises within the borough - historically, the land and buildings were part of a farm.
 - The area remains predominantly rural in nature; and,
 - the land around the permitted commercial and residential uses remains rural in character.
- 5.27 In so far as the proposed development for which planning permission is now sought this would involve a B8 storage use, which is by definition more passive, and given the size of the units and the location of the site, there would be no external storage as part of the proposals all the materials would be contained within the building. The development is for small scale units, and the Council is invited to conclude the uses would not have any material impact on the surrounding countryside
- 5.28 Interestingly, in the Council's Employment Needs Land Review (March 2023) in reference to the Borough Update Local plan, Draft Policy Spatial Strategy 1 (SS1) states employment development will be through intensification in the Core Employment Areas and town centre. It also supports appropriate small-scale development in the countryside. In terms of the users of the units, these are in the main individuals who are operating as sole traders, and who have been displaced as a consequence of redevelopment proposals elsewhere in Wokingham. They had been previously unable to find premises and to displace them from Warren Farm would seriously compromise the future functioning of these fledgling businesses.
- 5.29 It is not in dispute that the application site is located within the designated Countryside. As set out in the preceding text (paragraphs 5.9 – 5.23), however, the development the subject of this application relates to the use of existing buildings situated within an established complex of buildings. The relevant policy imperative is to ensure that the openness and rural character of the countryside are not compromised. Accordingly, the assessment of the principle of development is intrinsically linked to the site's countryside location and must be considered concurrently rather than in isolation.
- 5.30 Given the circumstances of the proposal, which involves the re-use of an existing building with no extension of the built footprint, it is submitted that the development would not offend the criteria or policy tests contained within Policy SS5 of the Emerging Local Plan or Policy CP11 of the adopted Core Strategy (2010). Both policies allow for development in the countryside where it is contained within existing buildings, avoids encroachment, and respects the character of the surrounding area.
- 5.31 Notwithstanding the policy guidance set out in the National Planning Policy Framework and carried forward within emerging policy, the pre-application response correctly identifies that the proposal should be assessed against the relevant tests in Policy CP11. The development is therefore considered against those tests as follows:

- the proposal contributes to diverse and sustainable rural enterprises within the borough, irrespective of scale- historically, the land and buildings were part of a farm.
- the wider area remains predominantly rural in nature; and,
- the land around the permitted commercial and residential uses remains rural in character.

Sustainability

- 5.32 The context for sustainability is set out previously in this statement, where it is demonstrated that emerging development plan policy promotes the use of rural sites, which by their very nature are isolated in character. The NPPF also promotes a strong, responsive, and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth.
- 5.33 It is a fact that the proprietors who occupy these units, the subject of this application, all live locally, this is not unsurprising since the scale of business would not be able to be operated from any distance. The occupiers are local people whose businesses are serving the local community.
- 5.34 The matter of sustainability has appeared frequently in the Council's consideration of development at Warren Farm. The Policies of the Core strategy in Policy CP15 and previous appeal decisions pre-date paragraph 89 of the NPPF. It is submitted that the matter of sustainability should be considered against the up-to-date criteria set out in paragraph 89 of the NPPF.
- 5.35 In this context, the development has been assessed against the criteria in paragraph 89 of the National Planning Policy Framework, which requires that rural business sites be sensitive to their surroundings and do not result in unacceptable impacts on local roads. As demonstrated in the submitted Highways Technical Note (Motion, June 2025), the proposed B8 use is fully contained within the existing building, would generate fewer daily vehicle movements than the previous agricultural use, and would have minimal impact during peak hours.
- 5.36 There is adequate space within the application site to provide vehicle parking and cycle provision comply with the Council's standards, and access arrangements are suitable for the scale of the development. Accordingly, the proposal is considered to be sensitive to its surroundings, with no unacceptable impact on the character of the countryside or the local highway network, the requirement for such provision can be addressed by condition.

Rural Industrial Development

- 5.37 The pre-app response cites Core Strategy Policy CP15 of the 2010 Core Strategy as providing the basis for future employment needs in the borough through retaining the Core Employment Areas and encouraging their continued intensification by supporting development for Class B and Class E(g) uses. This policy forms part of the adopted Development Plan, but it should be noted that it predates the policy guidance set out in the current National Planning Policy Framework (February 2025) and in the NPPF Consultation draft.

- 5.38 The Core Strategy is 15 years out of date and provides a very narrow and inflexible approach towards development for employment purposes. It is now recognised in both the NPPF (existing and emerging) and the Emerging Local Plan that *“decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport”* (NPPF paragraph 89; Emerging Local Plan Policy SS5 and ER3).
- 5.39 The retrospective application now submitted would be a development that, given all of the considerations, would be a re-use of an existing building and as such consistent with this policy approach which allows flexibility for development to meet local business and the local community needs, as supported by paragraphs 88 and 89 of the NPPF and Emerging Local Plan Policies SS5 and ER3.
- 5.40 The NPPF, in promoting a strategy of growth, upholds that policies and decisions should enable development, and it is a fact that the cumulative impact of small units will **all contribute** to an underlying strategy of growth in the economy. This approach is reflected in paragraph 88(a) of the NPPF, which recognises that policies and decisions 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, but in this case the conversion of existing buildings.
- 5.41 The extent of internal floorspace occupied is 240 sqm in total, and reference has been made previously (a) to the requirements of the current displaced occupiers and (b) to the Employment Land Needs Review 2023, which highlights a shortage of smaller units of commercial floorspace. This evidence base aligns with the PPG emphasis on using up-to-date local economic evidence.
- 5.42 The pre app refers to paragraph 87 of the Framework. This states that businesses for storage and distribution purposes should be located in suitably accessible locations. As is evident from the Transport Note, the application site is situated in an eminently accessible location, with ready access to the strategic highway network, and in close proximity to both Wokingham and Hurst. Accordingly, it does not offend the thesis of paragraph 89 of the NPPF and Policy CC07 of the MDD Local Plan.
- 5.43 Paragraph 1.3 of the Transport Notes identifies that the site is located to the west of Maidenhead Road, north of Forest Road and south of the M4. Wokingham is located approximately 3.6km south of the site and can be accessed in a 12-minute cycle. Hurst is approximately 4km north of the site, an approximately 15-minute cycle. These are not significant distances.
- 5.44 Paragraph 89 of the Framework recognises that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements and in locations that are not well served by public transport. In these circumstances, it will be important to ensure that development is sensitive to its surroundings and does not have an unacceptable impact on local roads. It is submitted that this location, meeting as it does the needs of local businesses, is consistent with paragraph 89 of the Framework and Emerging Local Plan Policy ER3.

- 5.45 The pre-app response reconciles the proposed development against the relevant criteria. It is submitted that the pre-app interpretation of the suitability of the premises misconstrues the intent of national and emerging policy. As set out above, development can represent sustainable development in the countryside through the re-use of an existing buildings, consistent with paragraph 88(a) of the NPPF, Policy SS5 of the Emerging Local Plan and Policy ER3. The proposals therefore constitute sustainable growth and expansion rather than unsustainable new occupation
- 5.46 The B8 use of the former Barn would not lead to the retention or development of accessible local services and community facilities. However, paragraph 88(a) of the NPPF makes clear that this is not a prerequisite for all rural business development.
- 5.47 Paragraphs 88 and 89 of the NPPF support the sustainable growth of rural businesses, including, through the reuse of existing buildings, and acknowledge that such development may need to be located beyond settlements and in areas with limited public transport accessibility. The proposal is consistent with this approach, involving a modest quantum of B8 floorspace within an existing building and supporting small local businesses, all of which is consistent with Emerging Local Plan Policies SS5 and ER3.
- 5.48 The total internal floorspace is limited to approximately 240 sqm, divided into four small units. While individually modest, the Framework recognises that economic growth is not solely a matter of scale, and the cumulative contribution of small rural enterprises forms part of a wider strategy to support local economic resilience. Evidence contained within the Employment Land Needs Review (2023) additionally identifies a shortfall of small industrial units within the Borough, all of which align with NPPF and PPG guidance.
- 5.49 In terms of accessibility as set out in the transport note, the site benefits from direct access to the strategic highway network, which is a relevant consideration for small-scale storage uses. Whilst the site is not well served by public transport, paragraph 89 of the Framework accepts that this will often be the case for rural employment sites, always provided other impacts are acceptable and the development is sensitively accommodated. As is demonstrated this is the case with the development the subject of this application. On this basis, the principle of rural industrial use in this location aligns with national policy and Emerging Local Plan Policy ER3.

Sustainable Development

- 5.50 Core Strategy Policies CP1, CP6, CP9 and CP11 seek to promote sustainable development patterns and reduce reliance on the private car, a principle reinforced by paragraph 4.57 of the Core Strategy. The Framework shares these objectives but adopts a more pragmatic approach to rural employment development, as reflected in paragraphs 88 and 89 of the NPPF and Policy CC01 of the MDD Local Plan. As set out in the preceding narrative there is an acceptance as part of NPPF Policy that the re-use of buildings is of itself sustainable. The sites' location is, as set out in the Transport Note, readily accessible for the wider highway network.

- 5.51 Given the small scale of the proposal and its reuse of an existing building, the level of trip generation would be limited and comparable with historic agricultural use. In this context, the proposal is not considered to undermine the overarching sustainability objectives of either the Development Plan or the Framework.

Character and Appearance of the Area

- 5.52 Policy CP3 of the Core Strategy, Policy TB21 of the MDD Local Plan and Policies R1, NR1 and NR2 of the Borough Design Guide SPD require development to respect local character and landscape context. The site lies within the Ashridge Farmed Clay Lowland Landscape Character Area, characterised by dispersed farmsteads and sparse development.
- 5.53 The proposal does not introduce new built form and remains visually contained within the existing Warren Farm complex, where commercial activity is already established. While the building has undergone changes, the continued use of the structure does not materially alter the wider landscape character. Subject to control over external storage the proposal can comply with Policy CP3, Policy TB21 and Policy SS5 of the Emerging Local Plan.
- 5.54 Paragraph 187(b) of the Framework requires development to recognise the intrinsic character and beauty of the countryside. The buildings already exist and are part of the intrinsic character and beauty of the countryside. The reuse and ongoing maintenance of the building is considered less harmful than redundancy, falling into disrepair or replacement development elsewhere, accordingly the development does not offend and is consistent with national and emerging policy objectives.

Neighbour Amenity

- 5.55 Policy CP3 of the Core Strategy, Policy CC06 of the MDD Local Plan and Appendix 1 all seek to protect residential amenity. There is residential development near to the application site (Warren Farm Cottage).
- 5.56 The pre-app advice accepts that given the modest scale of the units, such impacts in terms of noise, disturbance and activity are capable of being mitigated through appropriate controls on hours of operation and use. The scale of the storage use is such that there will be little activity arising from the use of the 4 units. Additionally, the building is conversely faced when considered in the context of the location of the residential units. The Applicant is not aware of any complaints resulting from the activities related to the use of the 4 units.

Highway Access and Parking Provision

- 5.57 The matter of highway access and transport related matters are addressed throughout this statement.
- 5.58 Policy CC07 of the MDD Local Plan set out parking and cycle provision standards, supported by Policies P2 and P3 of the Borough Design Guide SPD. While parking currently appears informal, provision can be formalised within the site without altering its character, consistent with paragraph 89 of the NPPF.

- 5.59 In response to the matters raised, a Highways Technical Note (Motion, June 2025) has been submitted to address these matters. The note confirms that the site is located in a sustainable rural location, approximately 3.6km north of Wokingham (a 12-minute cycle) and 4km south of Hurst (a 15-minute cycle), with direct connections to the Strategic Road Network, including the A329(M) at Coppid Beech. This accessibility demonstrates that the site is suitably located for small-scale rural business use.
- 5.60 All proposed car parking spaces have been designed to comply with the Council's standards, measuring 5.0m by 2.5m with a 6m separation between rows. In addition, one unallocated electric vehicle charging bay is provided, and covered, secure cycle parking is located conveniently for site users.
- 5.61 Trip generation has been assessed against three scenarios: the historical agricultural use of the site, the proposed B8 use, and two private dwellings. The analysis demonstrates that the proposed B8 use would generate fewer daily vehicle movements than the current agricultural use (3 compared to 7) and would have minimal impact during peak hours. HGV movements are extremely limited, with only one vehicle expected per day.
- 5.62 The Technical Note also confirms that the scale of the proposed B8 storage use, comprising small units within the existing building, would not result in significant highway impacts. The nature of the use is compatible with the site's access arrangements and the surrounding road network.
- 5.63 On this basis, it is concluded that the B8 use of the site complies with local car and cycle parking standards and would not have an unacceptable impact on local roads, fully addressing the concerns raised in the pre-application response. The Council is therefore invited to conclude that the proposal is acceptable in highway terms

Ecology

- 5.64 Policy CC04 of the Managing Development Delivery Local Plan and the Sustainable Design and Construction SPD require development to incorporate measures that promote energy efficiency, reduce carbon emissions and conserve resources. Policy R21 of the Borough Design Guide SPD similarly seeks to ensure that development contributes positively to environmental sustainability.
- 5.65 Given that the proposal involves the reuse of an existing building, which are traditionally constructed it is submitted that there is no need to incorporate proportionate sustainability measures.

Waste Storage

- 5.66 Policy CC04 of the Managing Development Delivery Local Plan requires adequate provision for the storage and segregation of waste and recyclable materials.
- 5.67 Waste storage facilities could be accommodated within or immediately adjacent to the existing building envelope. Details would be required to ensure compliance with Policy CC04 and to protect visual amenity.

Flooding

- 5.68 Policy CC09 of the Managing Development Delivery Local Plan requires consideration of flood risk and vulnerability. The site is located within Flood Zone 1, and the proposal does not involve any increase in built footprint or change in vulnerability classification.
- 5.69 On this basis, the development is acceptable in flood risk terms and accords with Policy CC09.

Drainage

- 5.70 Policy CC10 of the Managing Development Delivery Local Plan seeks to ensure that development incorporates sustainable drainage measures and does not increase surface water runoff. Foul drainage would connect to existing infrastructure, and surface water drainage can be managed through sustainable drainage techniques where feasible.
- 5.71 The Local Lead Flood Authority has confirmed that there are no objections in principle, subject to the submission of detailed drainage information. Accordingly, drainage matters are capable of being addressed in compliance with Policy CC10.

Light Spill

- 5.72 Other than PIR Security lighting there is no other lighting associated with the building, and therefore, no spillage of light outside of the site. It is also a fact that the matter of lighting falls to be considered against the back cloth of the existing development and the application site's location in the heart of the Warren Farm site.
- 5.73 Details of lighting could be the subject of an appropriately worded condition.

Odour

- 5.74 The site is used for B8 purposes the materials stored are inert and do not give rise to odours. In any event should there be any such odours this would be covered by the Environmental Protection Act 1990.

Overlooking/ Overbearing/ Loss of Light:

- 5.75 It is recognised in the pre-app response that the development involves the use of an existing building, the footprint of which and the height or scale will remain unchanged, as a consequence there are no significant impacts that would cause overlooking, nor would the development be overbearing nor cause any loss of light.

6. CONCLUSIONS

- 6.1 All relevant Development Plan policies, supplementary guidance, emerging policy, and national policy considerations have been taken into account. While the proposal conflicts with the restrictive spatial strategy of the adopted Core Strategy, it is a fact that these policies are out of date, and the current policy imperative is one which espouses a more flexible approach to the development the subject of this application.
- 6.2 Accordingly, greater weight should be afforded to the more up-to-date and flexible approach set out in the current, and emerging, National Planning Policy Framework and the Emerging Local Plan. This policy approach supports proportionate rural employment development through the reuse of existing buildings which may, as set out in Paragraph 89 (recited in Para 3.9) which recognises that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements. These may be in locations that are not well served by public transport.
- 6.3 Coupled to the acceptance that isolated buildings can be re-used, it is important to ensure that development is sensitive to its surroundings and does not have an unacceptable impact on local roads.
- 6.4 The Transport Note that accompanies this application makes it clear that the scale of the development is such that the site is ideally located in relation to the wider highway network, and in close proximity to the main urban areas, traffic generation arising from the development will have no impact on the highway network, and there is adequate space available within the site to accommodate service vehicles cars and cycles (the precise details can be addressed by a condition). In summary there are no highway matters arising from the use of the buildings.
- 6.5 The development does not give rise to any adverse amenity conditions and would appear merely as well-maintained agricultural buildings in the Countryside. The buildings serve a perceived need for local businesses who have already been displaced as a consequence of development within Wokingham.
- 6.6 Given the shortage of such units for small scale storage then the economic benefit to which all businesses contribute to the wider economic growth, then this would be lost.
- 6.7 There are no other matters which arise which would militate against the grant of planning permission in this respect.
- 6.8 As set out previously there remains an extant planning permission for the erection of two dwellinghouses, which if completed would impact on the openness of the countryside and would result in a greater reliance on the car. The applicant is prepared to discuss the foregoing of this extant planning permission as part of the consideration of this retrospective application.

