

PLANNING REF : 261825
PROPERTY ADDRESS : Warren House
: Scarletts Lane, Kiln Green, Berkshire
: RG10 9XD
SUBMITTED BY : Mr Simon Chapman
DATE SUBMITTED : 23/08/2026

COMMENTS:

Application No. 261825

I object to this application on a number of counts and I rely in part on the newly updated National Planning Policy Framework (NPPF) published on 17 August 2026, which states:
"The policies in this Framework are material considerations which must be taken into account in decision-making from the day of its publication."

I object to the characterisation of this plot as "grey belt", which NPPF26 defines as:
"land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in policy GB2".

Notwithstanding the applicant's claim that this plot is previously developed land (PDL), it clearly does not meet the NPPF glossary definition which states:
"Previously developed land: Land which has been lawfully developed and is or was occupied by a permanent structure and any fixed surface infrastructure associated with it, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed). It also includes land comprising large areas of fixed surface infrastructure such as large areas of hardstanding which have been lawfully developed. Previously developed land excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed but where provision for restoration has been made through development management procedures (including development related to minerals extraction, waste disposal by landfill and renewable and low carbon energy development, where provision for restoration exists); land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape."
Since the only structures on the site have been the lightweight, non-permanent polytunnel and greenhouse with a small area of associated hardstanding, it cannot be categorised as previously developed land. Moreover, the site fails the PDL test on two further grounds: the lawful use of the site ceased a decade ago and must now be deemed abandoned since no attempt has been made to maintain the polytunnel and greenhouse in serviceable order, both having become dilapidated and overgrown; and, the polytunnel and greenhouse served an agricultural purpose which in itself disqualifies the land for PDL classification.

Usefully, the NPPF glossary goes on to clarify that a "settlement" does not include "hamlets and scattered groups of houses located outside predominantly built-up areas, unless specifically defined as

a settlement in the development plan. For the purpose of this Framework they also exclude villages which lie within and are defined as part of the Green Belt in the development plan". Therefore, planning policy and guidance which relate to settlements do not determine planning decisions for this plot in Blakes Lane.

This application also fails on NPPF GB2 1(b) as it would harm the green belt, resulting in the loss of open countryside between the historic riverside towns of Henley and Maidenhead which are in danger of merging into one another following aggressive new housing development approvals along the A4 corridor and multiple "special circumstance" housing development approvals within the green belt at Hare Hatch, Burchetts Green, Littlewick Green and elsewhere. There are no special circumstances which would justify the loss of this green belt space in Blakes Lane which is in open countryside outside settlement boundaries.

NPPF S5 lists the only types of development which can be approved outside settlements, none of which applies to the proposed development. Notably, for reasons listed above and below, the development would not qualify under S5 c (reuse, or replacement of an existing building which is of permanent and substantial construction), d (redevelopment of previously developed land), e (limited infilling within groups of houses), g hi (within reasonable walking distance of a well-connected station), hii (physically well-related to the station or its settlement), hiii (of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure) or j (which would address an evidenced unmet need).

NPPF GB7 lists the only types of development considered "not inappropriate" within the green belt and, again, none applies to the proposed development:

GB7 1b allows "the reuse, extension, alteration or replacement of an existing building, provided that the existing building is of permanent and substantial construction, is lawful in planning terms, and any extension or alteration will not result in a disproportionate increase in size compared to the original building". However, the existing buildings (polytunnel and greenhouse) are not of permanent and substantial construction; and the proposed new building would be very clearly disproportionately larger than the existing buildings since it would have a footprint of 734sqm versus the aggregate 158sqm of the existing structures (a 572% increase), a volume of 2,346m³ versus the aggregate 353m³ of the existing structures (a 664% increase) and a height of 9.3m versus 3m (a 310% increase).

GB7 1c allows "limited infilling in villages lying within the Green Belt" but this plot is in open countryside, outside settlement boundaries and therefore cannot qualify. In any event, infilling should not be considered for such a plot which provides open space between two dissimilar dwellings some 110m apart surrounded by open countryside on all sides.

GB7 1e allows "the redevelopment of previously developed land (including a material change of use to residential or mixed-use including residential), which would not cause substantial harm to the openness of the Green Belt". However, for the reasons stated above, this site does not qualify as previously developed land.

GB7 1g allows development where *all* the following apply:

i. 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;
ii. There is an evidenced unmet need for the type of development proposed;
iii. The development would be in a sustainable location
This plot does not qualify as grey belt land because it contributes to the key green belt purpose of preventing the merging together of Henley and Maidenhead, and fundamentally so when taken together with other recent, planned and proposed developments in this area.

There is no evidenced unmet need for this type of dwelling, namely a six bedroom mansion with eight bathrooms. Indeed, this area is over-supplied with such dwellings according to local estate agents. This plot is not in a sustainable location since it is not within reasonable walking distance (defined in the NPPF glossary as 800m or 10 minutes' walk) of any station, school, shop, public house, garage, GP surgery, church or any other service or facility apart from a bus stop for the 127 service which only runs on Saturdays. While cycling may be an option for some journeys, it is impracticable and potentially dangerous for others since Blakes Lane and its intersecting lanes are narrow, single lane carriageways without footways or street lights which are subject to a 60mph speed limit and often heavy, fast-moving motorised traffic. Assuming full occupancy of the proposed new dwelling, this could result in up to 50 additional motorised journeys per day to and from this site. (Notwithstanding the designated parking spaces shown on the plan, 10-12 vehicles could be parked on the site.)
GB7 1h allows "residential or mixed-use development which would: i. Be within reasonable walking distance of a well-connected station;
ii. Be physically well-related to the station or the settlement within which the station is located."
This plot clearly falls well short of both these requirements.

NPPF H011 applies should this proposed new dwelling and its immediate neighbours be designated "isolated homes in the countryside" because they do not lie within a settlement. This being so, such a development proposal should only be supported if a) there is an essential need for a rural worker to live there (not applicable); b) the development would be appropriate enabling development to secure the future of heritage assets (not applicable); c) the development would reuse a redundant or disused building and enhance its immediate setting (not applicable); d) the development would involve the subdivision of an existing residential building (not applicable); or e) its design is truly outstanding, reflecting the highest standards in architecture, and would help to raise standards of design more generally in rural areas; and would significantly enhance its immediate setting, and be sensitive to the defining characteristics of the local area (not applicable in my opinion).

The proposed site also fails to meet the definition of Exception Sites as set out in H010.

NPPF H07 ("Meeting the need for homes") states that "substantial weight should be given to the benefits of providing homes which will contribute towards meeting the evidenced accommodation needs of the

community". Whether the community in question is Blakes Lane or Wargrave Parish or indeed Thames Ward, there is no evidence that a six-bedroom house with eight bathrooms is needed by anyone. It does appear to be needed by the site owner and the applicant but they are not members of these communities, nor even residents of Wokingham Borough. The planning decision will therefore hopefully give great weight to the fact that this proposed development is NOT needed by the community.

People familiar with the application have told me that the applicant, a property developer, will purchase the plot from the owner if he can secure planning permission - and would be required to live in the resulting dwelling for at least three years if planning permission is granted for a self-build dwelling. Thus, he presumably hopes to become a member of the community but does not qualify as such for the determination of his planning application.

NPPF H01 ("Assessing the need for homes") states that "development plans should also take into account an assessment of the size, type and tenure of housing or other accommodation needed for different groups" including "people wishing to commission or build their own homes".

Given that neither the site owner nor the applicant has any current connection to the local community, it would be surprising if either were able to meet Wokingham Borough Council's eligibility criteria for Part 1 of the Custom and Self-Build Housing Register (see <https://tinyurl.com/mryuhffy>). The local connection test requires applicants:

- To have either lived in the borough for at least 5 years; or
- To be in full-time employment (greater than 16 hours per week) within the Borough for at least 5 years; and/or
- To have an immediate family member who has lived in the borough for the past 5 years prior to their application.

The Council confirmed in a FOI response (see /5tz34b8z) that it "only meets demand for self and custom build homes from individuals and associations whom are able to demonstrate a strong local connection to the Borough".

And even if the owner or applicant were able to demonstrate a strong connection with the local community, I understand that Wokingham Borough Council is hitting its self-build targets and therefore does not need to approve new builds for this purpose.

The applicant emphasizes the "lawful fallback position" of the site, stating that the former horticultural storage use of the site is capable of immediate implementation in the event that planning permission is refused. Given that the approved use ceased ten years ago, and that no effort has been made to maintain the former lightweight storage structures in serviceable order, nor any other use of the land undertaken, the previous lawful use must now be considered to be abandoned. No doubt the owner could re-apply for it but that would not be immediate implementation and nor could it be guaranteed to be granted. Nor is it clear how the applicant would have the claimed ownership and control of the site in the event that planning permission were refused.

In summary, this green belt plot does not qualify as grey belt and even if this government succeeds in commandeering all of our

legitimate green belt land in Thames ward, this application should still be refused on the numerous grounds I have highlighted. Of particular concern are the harm such a development would do to the green belt, the lack of any need in the community for such a development, the unsustainable location of the plot, the harm that would be inflicted on the shared users (including residents) of Blakes Lane by the potential increase in vehicular journeys to and from the proposed dwelling, the threat to the dark sky from high level dormer windows, and the breathtaking disproportionality of the scale of the proposed dwelling, being not only 500% bigger than the dilapidated structures it would replace but also significantly bigger than the other houses in Blakes Lane, including immediate neighbour, 'Merchiston', which at 1,320m³ is the most imposing property in the area and would be dwarfed by the proposed new dwelling next door which would be 77% bigger.

In light of the above, it is perplexing that Wokingham Borough Council allegedly gave the applicant pre-application advice that the proposed dwelling would not constitute inappropriate development in the green (or grey) belt, and that the scale of the proposed development was not considered out of character with the existing townscape and landscape.

Hopefully, it can now avoid the poor optics of granting planning permission for a huge, UNaffordable and inappropriate dwelling in an unsustainable location which does not meet any evidenced community need.