

PLANNING REF : 261825
PROPERTY ADDRESS : Glebe House
: Blakes Lane, Hare Hatch, Reading
: RG10 9TD
SUBMITTED BY : Mr John&Janet Hargreaves
DATE SUBMITTED : 18/09/2026

COMMENTS:

RESPONSE TO PRE-APPLICATION ADVICE AND OBJECTION TO PLANNING
APPLICATION 261825

Application reference: 261825

Site: Land between Merchiston and Glebe House, Blakes Lane, Wargrave

Property: Glebe House, Blakes Lane, Hare Hatch, Reading RG10 9TD

Submitted by: John Hargreaves and Janet Hargreaves

OBJECTOR DETAILS

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Introduction

I wish to register a formal objection to planning application 261825 for the demolition of the existing horticultural structures and the construction of a substantial new dwelling at Land between Merchiston and Glebe House, Blakes Lane, Wargrave.

The proposal raises a number of important planning considerations, including the Green Belt and Grey Belt status of the land, the extent of previously developed land, the scale and character of the proposed development, its landscape and visual effects, ecology and biodiversity, drainage, highways and accessibility, and the effect on neighbouring residential amenity.

The Council's pre-application advice identified a number of these matters as requiring careful consideration. This objection considers those matters alongside the submitted application material, the Council's planning and Green Belt evidence, the planning history of the site and relevant previous appeal decisions, together with additional evidence concerning the present condition and history of the land.

The detailed reasons for objection are set out below.

1. Grey Belt / Green Belt / W11

1.1 Correct sequence of assessment

The applicant's Grey Belt case should not be treated as a shortcut to permission. The Council should first establish whether the land properly falls within the Grey Belt definition and, if so, whether the proposal satisfies the applicable national policy requirements. The sequence should include: (A) whether the land is properly Grey Belt; (B) if so, whether the proposal satisfies the relevant Grey Belt requirements, including GB7; (C) whether development would fundamentally undermine the purposes of the remaining Green Belt across the plan area; and (D) the effect on Green Belt purposes, particularly purpose (c), together with the strategic role identified by the Council for W11.

The applicant's conclusions that the site qualifies as Grey Belt and that the proposal would not constitute inappropriate development are assertions made in the application material. They are not findings which the Council is required to adopt. [A1, Planning Statement, 5.1(a), 6.6 onward, 7.2(c)].

1.2 Extent of land said to have horticultural history

The evidence indicates that the historic horticultural activity and associated structures occupied only a limited part of the wider land. The Council should identify precisely which land is said to have been developed or used for that purpose and distinguish it from the

remainder of the application site. The existence of structures on part of the land does not automatically confer Grey Belt or developed status on the whole site.

The 2002 application and appeal, 0/2002/6493 and APP/X0360/A/02/1097769, provide important contemporaneous evidence. Following a site inspection, the Inspector described the eastern part of the land as having the appearance of an orchard. That is relevant historical evidence that the wider land cannot simply be characterised retrospectively by reference to horticultural structures or nursery activity on part of the site.

1.3 Grey Belt status does not remove the wider Green Belt assessment

Even where land falls within the Grey Belt, the proposal must still satisfy the applicable national policy tests and other material planning considerations. The Council should make reasoned findings rather than treating the Grey Belt label itself as establishing acceptability.

The current NPPF was published on 17 August 2026 and replaces the previous December 2024 Framework. [A21]. Under the current framework, GB6 directs the assessment of inappropriate development in the Green Belt to GB7, while GB7(1)(g) sets out the relevant conditions for development on Grey Belt land.

1.4 Current Grey Belt safeguards

The recent national planning reforms should not be interpreted as creating a general route for residential development on Green Belt land. The Government described the proposed reforms as a strategic and targeted approach to the release of appropriate land, "underpinned by clear safeguards".

Those safeguards are particularly relevant to this proposal.

GB7(1)(g)(i)-(iv) requires the applicable conditions to be addressed, including that development would not fundamentally undermine the purposes of the remaining Green Belt, that there is evidenced unmet

need for the type of development proposed, that the site is in a sustainable location with particular reference to TR3, and, for major housing development, that the Golden Rules in GB8 are met where applicable.

A general housing requirement or housing supply shortfall cannot therefore become, in effect, a justification for a substantial individual dwelling without considering whether there is demonstrable unmet need for the particular type of development proposed and whether this is a sustainable location.

The housing evidence cited by Simon Chapman records 1,319 households, comprising 586 one-bedroom, 316 two-bedroom, 330 three-bedroom, 72 four-bedroom, 13 five-bedroom and 1 six-bedroom household. Those

figures are attributed to Simon Chapman's submission and should not be presented as independent Council statistics. They nevertheless illustrate why the Council should consider the actual type and size of any evidenced unmet need. The issue is not whether there is any housing need, but whether the evidence demonstrates unmet need for a dwelling of this particular size and type.

1.5 W11 strategic role and Green Belt purpose (c)

The Council's Bracknell & Wokingham Green Belt Review identifies Parcel W11 as "Land to the north east of Wargrave between Highfield Road, Blakes Lane and the A4 Bath Road". The Council assesses W11 as making an overall contribution to Green Belt purposes. Its evidence identifies prevention of encroachment into the wider countryside, keeping land open and helping contain the north-eastern fringes of Wargrave as relevant functions. [A19, A20]. This evidence does not itself determine whether the application site is Grey Belt under the current NPPF, but it is highly material evidence of the established strategic function of the wider landscape. The Council should identify the precise W11 sub-parcel in which the application red-line falls and consider the proposal in that context.

Purpose (c), safeguarding the countryside from encroachment, is particularly relevant. The proposal should be considered not merely as one dwelling but in the context of the settlement/countryside relationship and the potential for incremental urbanisation of the wider Blakes Lane area.

1.6 2018 Merchiston appeal and cumulative effect

The 2018 appeal decision APP/X0360/W/17/3184577, application 170445, was dismissed on 6 March 2018. The Inspector found harm to Green Belt openness from the greater bulk and size of the proposed dwelling and harm to countryside character and appearance from its domestic

character in contrast with the horticultural/rural character of the site. [A18].

The current proposal is substantially larger and more intensive. The earlier decision is not determinative under the current policy framework, but it is important site-specific evidence. The Council should explain why the earlier reasoning does not apply to the substantially larger current proposal.

The W11 evidence also identifies the north-eastern fringes of Wargrave as vulnerable to incremental change. The cumulative effect is

therefore relevant to the assessment of whether the proposal would contribute to a gradual urbanisation of the countryside edge, even though precedent is not relied upon as a standalone reason for refusal.

2. Previously Developed Land and extent of developed area

The applicant relies on Certificate of Lawfulness ref. 152003 and historic nursery use. [A1, 2.8-2.11 and 6.2-6.5; A17]. The critical question is the precise extent of land that can properly be treated as previously developed land and the legal significance of the former use.

The certificate plan covers a defined and relatively limited area, approximately one-third of the current application site. The Council should identify the precise land covered by the certificate and distinguish it from the wider application site. The existence of a polytunnel, greenhouse, shed or other structure on part of the site does not automatically make the entire site previously developed land.

The 2002 evidence is important in this respect because the eastern part was described as having the appearance of an orchard. The 2018 appeal is also relevant site-specific evidence concerning the character of the horticultural structures and the distinction between them and permanent residential development. [A18, A23].

The current proposal is substantially more than a replacement of

horticultural structures. Even if a defined part of the site is accepted as previously developed land, that does not establish that the whole application site is previously developed or that the proposed residential development is acceptable.

The applicant's claimed lawful fallback should likewise be treated as an evidential matter. The Council should identify the exact use and area authorised by Certificate 152003 and establish whether the claimed fallback is lawfully and realistically capable of implementation in the present circumstances, rather than assuming that it is available.

3. Scale, Massing and Domestic Intensity

The proposed dwelling is approximately 734 sq m and approximately 9.3 m high. It contains six bedrooms, each with an en-suite bathroom. The proposal also includes a detached garage, terrace, access, parking and substantial domestic external areas. [A1, 3.3-3.6; A7; submitted plan set].

The proposal is therefore not a modest replacement of horticultural structures. It is a very substantial permanent residential building with associated domestic infrastructure. The assessment should consider height, bulk, volume, roof form, solidity, garden, parking, hardstanding, lighting and residential paraphernalia, as these all affect the spatial and visual experience of openness.

The 2018 Inspector found Green Belt openness harm from a materially smaller dwelling. The Council should therefore identify the evidence supporting any conclusion that a substantially larger dwelling would avoid or materially reduce that harm.

The presence of houses either side does not itself establish that a dwelling of this scale and domestic intensity is appropriate. The relevant question is whether the proposed form, scale and massing are appropriate in this Green Belt/countryside setting.

4. Landscape, Visual Impact, Settlement Character & Contextual

Design The site lies at the edge of Wargrave, between residential properties and the wider countryside. Its character is therefore derived from the relationship between buildings, open land, vegetation, roads and the surrounding rural landscape. The Council's Landscape Character Assessment and relevant design policies should be considered alongside the site-specific evidence.

The pre-application advice referred to dense tree coverage. That description reflected the earlier condition of the site. In March 2026 approximately 30 trees were removed, including the former orchard, substantially changing the landscape condition before determination. The site is now more open and exposed, with only relatively thin screening around three sides and some conifers nearest Glebe House. The applicant has also stated verbally that he wishes to remove those conifers, although they are currently to remain.

The visual assessment should therefore be based on the present condition of the site and should not assume that former dense screening remains. Views from Blakes Lane, neighbouring properties and the surrounding countryside should be assessed having regard to the proposed height, massing, roof form and domestic features.

Wargrave is a historic rural settlement with a long-established settlement pattern. Its historic character and relationship with the surrounding countryside are relevant contextual considerations. The existence of established houses on both sides of the site does not by itself make a substantial new dwelling part of the established

settlement character. The Council should consider whether the proposal preserves the distinction between settlement and countryside or contributes to incremental urbanisation.

The design should also be assessed contextually. Appropriate materials alone do not make a development appropriate. Form, roofscape, scale, massing, detailing, external areas and the relationship to neighbouring buildings and the rural edge all need to respond to Wargrave's character and the particular site.

5. Ecology, Biodiversity & Ecological Baseline

The March 2026 clearance substantially altered the ecological character of the site before the planning application was determined. Approximately 30 trees were removed, including the former orchard, leaving a much more open and barren area. The clearance occurred during the bird-nesting season. The former orchard provided habitat, feeding and nesting opportunities for birds, as well as habitat and movement opportunities for insects, reptiles and mammals.

The former orchard also formed part of a wider connection between woodland and other habitat areas separated by Blakes Lane. It should be considered as part of a wildlife corridor. Local observations indicate that deer used this corridor extensively when it felt safe to do so. The Council should consider whether the proposed development, domestic activity, lighting and boundary treatment would reduce the permeability or ecological value of that corridor. There has also been a marked reduction in bats visiting the neighbouring garden since the clearance, principally associated with the reduction in flying insects. This is a local observation rather than documentary proof of the cause, but it is relevant evidence that should not be dismissed without consideration. The bird habitat point remains separate and important: the former orchard provided habitat, feeding and nesting opportunities for birds as well as supporting the wider food chain.

The July 2026 ecological survey was undertaken after the clearance. The Council should therefore establish an appropriate pre-clearance ecological baseline using reliable evidence, including dated photographs, aerial imagery, previous surveys, arboricultural and Tree Officer information and other relevant historical evidence. A post-clearance survey should not automatically be treated as a complete representation of the site's pre-clearance biodiversity value.

The 2018 appeal also raised ecological concerns, including reptiles and potential bat roosts. [A18]. The current proposal should therefore be assessed against the site's historic and present ecological context, including retained habitat, wildlife movement, lighting, boundary permeability and the effects of further construction and domestic use.

5.1 Biodiversity Net Gain

The applicant relies on a self-build/custom-build Biodiversity Net Gain exemption. [A5; A1, 6.67-6.74]. The Council should establish the legal basis for that claim rather than assuming that the exemption applies.

The Government's BNG regime changed on 6 August 2026. The previous self-build/custom-build exemption no longer applies to new planning applications made on or after that date, while transitional arrangements apply to applications made before 6 August 2026 subject to the relevant conditions. A separate small-site exemption applies from 6 August 2026 to sites of 0.2 hectares or less. The application

site is approximately 0.42-0.43 hectares on the application evidence, so the small-site threshold does not appear to apply, subject to confirmation of the red-line area. Documents were submitted to the Council on both 3 August and 5 August 2026, while the application was validated on 6 August. The date of an individual supporting document or the validation date should not automatically be treated as the legally relevant date for the BNG transitional provisions. The Council should formally confirm the legally relevant date on which application 261825 was "made" for BNG purposes, having regard to the dates on which the application and supporting documentation were submitted, and then determine whether the claimed exemption is legally available.

Whatever the outcome on exemption, BNG status does not remove the need to assess ecological impacts, the loss of the former orchard, habitat connectivity and the adequacy of mitigation.

6. Drainage & Surface Water

The proposal introduces a substantial dwelling, garage, access, parking, terrace and associated hard surfaces. The Council should be satisfied that the drainage strategy is based on the actual site conditions and demonstrates how surface water will be managed without increasing risk to neighbouring properties or downstream receptors.

[A4].

The assessment should establish existing drainage routes, topography and natural flow paths, the proposed runoff and discharge arrangements, SuDS/storage and attenuation, exceedance routes, receiving-watercourse capacity, maintenance and the consequences of blockage, pump failure or loss of power if pumping is relied upon. The essential principles of drainage and flood-risk management should be demonstrated before permission is granted. The existence of a

drainage report should not by itself be treated as proof that the proposal is deliverable.

7. Highways, Access, Pedestrian Safety & Sustainable Accessibility

The local road environment is an important consideration. Blakes Road/Blakes Lane is narrow in places, includes bends and restricted visibility and is unlit. The approach from Bear Lane also presents restricted visibility. The Council should assess vehicle speeds, road width and alignment, entry and exit arrangements, manoeuvring, pedestrian use including dog walkers, parking and turning, and interaction with other road users.

Traffic volume and vehicle speeds on Blakes Lane have increased significantly over the last ten years, with an associated increase in risk to pedestrians and cyclists. This current change in the local

highway environment is not addressed in the pre-application advice or the submitted highways assessment and should be taken into account in assessing highway safety and accessibility.

The sustainable-location question should also be assessed in practical terms. The application identifies Wargrave railway station and local bus stops and services at stated distances. [A1, 2.4]. Those distances should be acknowledged, but the Council should consider whether the actual rural road environment and absence of continuous footways provide a genuine choice of walking, cycling and public transport for this type and scale of residential development. Current NPPF policy TR3 requires development to limit private-car travel and offer a genuine choice of transport modes

unless the nature of the development or its location makes this impractical. The Council should apply that policy proportionately to this rural edge-of-settlement site and the actual proposal rather than relying solely on straight-line or stated distances to facilities. 8. Residential Amenity, Privacy & Overlooking

The scale, height and position of the proposed dwelling raise potential residential-amenity concerns for neighbouring properties, particularly Glebe House and Merchiston. The Council's design guidance requires reasonable visual privacy and appropriate relationships between windows, rooms, gardens, boundaries and buildings.

The pre-application advice identified Glebe House and Merchiston as neighbours likely to be affected and indicated that side windows should be carefully considered and potentially omitted. The Council should assess the final position, height, size and orientation of windows, the rooms they serve and their relationship to neighbouring windows, living areas and gardens, including direct and oblique views.

The issue is not confined to direct overlooking. The scale and proximity of the proposed dwelling may also affect outlook and the sense of visual dominance from neighbouring properties. Existing vegetation should not be assumed to provide permanent protection where the site has already been cleared and screening has materially reduced.

If permission is contemplated, an acceptable relationship with neighbouring properties should be established before permission is granted. Appropriate safeguards could include removal or repositioning of windows, obscure glazing, restrictions on opening, adequate

separation, permanent screening and landscaping, where justified by the site-specific impacts.

Conclusion / Planning Balance

This objection is submitted in response to planning application 261825 and to the matters identified through the Council's pre-application process. Pre-application advice cannot determine the outcome of a subsequent planning application or pre-empt the Council's democratic decision-making process. Its relevance here is as a useful benchmark: the question is whether the issues identified by the Council have been adequately addressed by the application now before it. In particular, the Council should reach a clear and evidence-based conclusion on:

- whether the site, or only part of it, properly falls within the Grey Belt and the precise extent of any previously developed land;
- whether the relevant national Green Belt and Grey Belt requirements, including the requirements of GB7, are satisfied;
- the effect of the proposal on the remaining Green Belt and, in particular, the strategic role identified for the wider W11 area;
- whether the scale, massing, footprint and intensively domestic character of the proposed dwelling are appropriate to this countryside location, rather than relying on the description of the proposal as a "modest building" in the pre-application advice;
- the landscape and visual consequences of the development, taking account of the substantial change in site conditions following the March 2026 clearance;
- the ecological consequences of that clearance and the need to establish an appropriate ecological baseline, including the former orchard, wildlife corridor and associated habitat value;
- highway safety and accessibility, including the current level and

speed of traffic on Blakes Lane and the implications for pedestrians and cyclists;

- drainage and surface-water effects, including the need for an appropriate drainage/SuDS scheme; and
- the effect of the proposed development on neighbouring residential amenity.

The Council should also consider the cumulative implications of further residential development within the W11 area. The 2018 appeal decision relating to land adjacent to Merchiston provides relevant site-specific planning evidence concerning residential development, openness and countryside character, although the current application must of course be determined under the policies and circumstances applicable to it.

The proposal should not therefore be considered simply as the replacement of former horticultural structures. The development comprises a substantial permanent dwelling and associated domestic use within a Green Belt countryside setting. Its actual scale, massing, domestic intensity, landscape effects, ecological consequences, highway implications, drainage and effect on neighbouring properties are material considerations in determining whether the development is acceptable.

The Council should distinguish between matters demonstrated by evidence and matters that remain assertions or require further clarification. Where essential evidence is incomplete or where the March 2026 clearance has materially altered the site from the condition considered during the pre-application process, the Council should ensure that the decision is based on an appropriate and properly evidenced assessment.

For these reasons, the planning balance should be undertaken only after the above matters have been properly assessed against the applicable national and development plan policies. The fact that aspects of the proposal received positive or conditional consideration at pre-application stage should not be treated as establishing that the submitted scheme is acceptable.

For these reasons, I respectfully request that planning application 261825 be refused.

Matters for the Council to Address

1. Grey Belt and Green Belt status establish the precise extent of any land that properly falls within the Grey Belt or constitutes previously developed land, rather than assuming that the historic horticultural use applied to the whole site; and assess the proposal against all relevant Green Belt/Grey Belt requirements, including GB7. (Point 1)

2. Green Belt and W11 considerations assess the effect of the proposal on openness, countryside character and the strategic Green Belt role of the wider W11 area, including the potential cumulative effect of further residential development. (Point 1)

3. Scale and domestic intensity assess the actual scale, massing, footprint, height and intensively domestic nature of the proposed dwelling, rather than relying on its description in the pre-application advice as a "modest building". (Point 3)

4. Landscape and visual assessment take account of the substantial change in site conditions following the March 2026 clearance, including the reduction in existing screening and the potential future loss of remaining conifers/screening. (Point 4)

5. Ecological baseline and March 2026 clearance establish an appropriate ecological baseline that does not simply rely on the site's post-clearance condition; address the former orchard, wildlife corridor, habitat loss, birds, bats and flying insects, and

the legal basis for any claimed BNG exemption. (Point 5)

6. Highways and accessibility consider the current level and speed of traffic on Blakes Lane, including the significant increase in traffic and traffic speed over the last ten years and the associated risks to pedestrians and cyclists, notwithstanding that these matters are not adequately addressed in the pre-application advice or highways assessment. (Point 6)

7. Drainage and surface water require an appropriate detailed drainage/SuDS scheme, including exceedance flows, ongoing maintenance, infiltration testing and other relevant technical requirements as required under BRE 365, demonstrating that the development will not increase flood or surface-water risk to neighbouring properties.

(Point 7)

8. Residential amenity carefully assess the relationship with Glebe House and Merchiston, including overlooking, privacy, outlook, visual dominance, window positions and the permanence of any proposed

screening. (Point 8)

9. Evidence and decision-making distinguish between matters demonstrated by evidence and matters that remain assertions or require clarification, and ensure that the final planning balance is based on the actual proposal, the applicable policies and an appropriately evidenced assessment of the above matters.

Requested Safeguards / Conditions

If the Council is nevertheless minded to grant planning permission, the following matters should be appropriately secured:

- Permitted development rights: Consider removal of relevant permitted development rights to prevent further enlargement or intensification of the dwelling and its domestic curtilage.
- Landscape and screening: Retention and protection of existing screening, together with an appropriate landscape and planting scheme and arrangements for its long-term maintenance.
- Trees and vegetation: Protection of retained trees and vegetation during construction, with no further significant removal without the Council's approval.

- Ecology and biodiversity: Appropriate ecological protection and mitigation, including protection of wildlife movement and habitat.

The legal basis for any claimed BNG exemption should be clearly established.

- Drainage and surface water: A detailed drainage/SuDS scheme, including provision for exceedance flows and ongoing maintenance, with infiltration testing and other relevant technical requirements as required under BRE 365, to demonstrate that the development will not increase flood or surface-water risk to neighbouring properties.

- Access and highways: Appropriate control of access, visibility, parking, turning and construction traffic arrangements, having regard to the restricted local road network.

- Residential amenity: Appropriate control of windows, glazing, screening and landscaping to protect the privacy and outlook of neighbouring properties, particularly Glebe House and Merchiston.

- Construction management: A construction management plan addressing construction traffic, deliveries, working hours, noise, dust and protection of neighbouring properties and the local highway network.

Evidence Schedule

- A1 - Planning Statement, hgh Consulting, August 2026: 2.4, 2.7-2.11, 3.3-3.6, 5.1, 6.2-6.21, 6.67-6.78, 7.2.

- A2 - Design and Access Statement, architecture made-in, July 2026.

- A3 - Preliminary Ecological Appraisal and Preliminary Roost Assessment, Eco 360, survey dated 7 July 2026.
- A4 - Drainage Strategy, Canham Consulting, ref. 260327-CCL-XX-XX-RP-C-1000.
- A5 - BNG Exemption Statement, Riverway Group, 31 July 2026.
- A6 - Arboricultural Method Statement, Oakfield, July 2026.
- A7 - CIL Forms 1 and 7, hgh Consulting, 3 August 2026.
- A8-A16 - Submitted existing and proposed site, block, demolition, floor, elevation and roof drawings.
- A17 - Certificate of Lawfulness ref. 152003, Wokingham Borough Council, approved 23 June 2015.
- A18 - Planning Inspectorate Appeal Decision APP/X0360/W/17/3184577, decision dated 6 March 2018, application 170445.

- A19 - Bracknell & Wokingham Green Belt Review, Wokingham Borough Council, June 2016, Parcel W11.
- A20 - Bracknell & Wokingham Green Belt Review, Appendix C - Wokingham Refined Assessment.
- A21 - National Planning Policy Framework, published 17 August 2026.
- A22 - Relevant adopted Wokingham Borough development plan policies, including Core Strategy CP1, CP3, CP6, CP7, CP11 and CP12 and Managing Development Delivery policies identified in the application documents.
- A23 - Planning application 0/2002/6493 and associated Planning Inspectorate appeal decision APP/X0360/A/02/1097769, concerning land adjoining Merchiston, Blakes Lane, Hare Hatch, 2002.