

DELEGATED OFFICER REPORT



WOKINGHAM
BOROUGH COUNCIL

Application Number:	251762
Site Address:	Newlands Farm, New Bath Road, Twyford, RG10 9RY
Expiry Date:	6 October 2025
Site Visit Date:	20 August 2025
Proposal: Full application for the proposed change of use of agricultural land for parking associated with adjacent commercial buildings in B2 and B8 use	

PLANNING POLICY	
National Policy	National Planning Policy Framework (NPPF) National Planning Policy Guidance (NPPG)
Core Strategy (CS)	CP1 – Sustainable Development CP2 – Inclusive Communities CP3 – General Principles for Development CP6 – Managing Travel Demand CP7 – Biodiversity CP9 – Scale and Location of Development Proposals CP11 – Proposals Outside Development Limits
MDD Local Plan (MDD)	CC01 – Presumption in Favour of Sustainable Development CC02 – Development Limits CC03 – Green Infrastructure, Trees and Landscaping CC04 – Sustainable Design and Construction CC06 – Noise CC07 – Parking CC09 – Development and Flood Risk CC10 – Sustainable Drainage TB21 – Landscape Character TB23 – Biodiversity and Development
Joint Minerals and Waste Plan (JMWP)	The site is not located in an area where the JMWP would apply.
Wokingham Borough Local Plan Update (LPU)	SS1 – Sustainable development principles SS2 – Spatial strategy and settlement hierarchy SS5 – Development in the countryside SS8 – Meeting our employment needs C5 – Parking and electric vehicle charging ER2 – Employment uses outside of Core Employment Areas ER3 – Supporting the rural economy FD1 – Development and flood risk (from all sources) FD2 – Sustainable drainage NE1 – Biodiversity and geodiversity

	NE2 – Biodiversity net gain NE4 – Trees, woodland, hedges and hedgerows NE5 – Landscape and design DH1 – Place making and quality design DH2 – Safeguarding amenity HC5 – Environmental protection HC7 – Light pollution HC8 – Noise pollution
Other	Borough Design Guide Supplementary Planning Document CIL Guidance + 123 List

PLANNING HISTORY

Application No.	Description	Decision & Date
220694	Full application for the proposed erection of hardstanding (Retrospective).	Approved 25/05/25

CONSULTATION RESPONSES

Internal

WBC Drainage – No objection
WBC Enforcement – No comments received
WBC Highways – No objection subject to condition
WBC Landscape and Trees – No objection subject to condition
WBC Ecology Newts – No comments to make
WBC Ecology – No objection subject to condition

External

The Environment Agency – No objection

REPRESENTATIONS

Parish/Town Council	Comments received from Charvil Parish Council: <i>By allowing this hard standing to be used for light industrial use, rather than agriculture, the likelihood is that there will be more commercial vehicles traversing the shared use cycle/walkway. This is a major route to the Piggott secondary school from Charvil and Sonning and the Parish Council has concerns that increased</i> Officer comments: This was not raised as a concern by WBC Highways and therefore Officers have no evidence to resist the application on this basis. <i>The Parish Council also has concerns about the pattern used by the landowner of conveniently changing business practices to increase the hard standing area in the flood plain. The original barns and hard standing that had been raised so they didn't flood, was allowed to have a change of use because they were allegedly no longer needed for the farm,</i>
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	<i>only for a further area of hard standing (similarly raised) to be given permission in 2022 because they did need hard standing for the farm after all , and now this is being turned over to the commercial enterprises that are growing on the site. It is unlikely this hard standing would have been given permission if it had been for commercial use originally. If this retrospective planning permission is granted, the Parish Council would like to see conditions attached that no further areas of hard standing are allowed due to the impact of flooding on nearby properties, and that vehicle movements are restricted to avoid the main school traffic.</i> Officer comment: The proposal will be considered in the context of flood risk later in the report. Changes in patterns of the landowner are noted, however officers are bound to assess all applications submitted by applicants against relevant planning policies. It will not be necessary to impose conditions to prevent further hardstanding as any new areas of hardstanding will need planning permission in their own right and if established, could be subject to enforcement action.
Ward Member(s)	No comments received
Neighbours	No comments received

APPRAISAL

Site Description:

Newlands Farm is a mixed agricultural and commercial site located on the northern side of New Bath Road, to the north west of the settlement of Charvil. It is accessed via Loddon Drive.

The wider site comprises of 11 units which have a lawful B2 or B8 use. The remainder of the site to the north is in agricultural use, consisting primarily of open fields, with the exception of the part of the site subject to this application which is an area of permeable gravel.

There are no immediate neighbours around the site.

Proposal:

Planning permission is sought for the material change of use of the land to use this area of hardstanding for commercial purposes rather than agricultural.

The area and physical form of the hardstanding is lawful, having gained planning permission in 2022 to be used for agricultural purposes, such as storing agricultural vehicles. However, it is now proposed to be used in connection with storing vehicles associated with the B2 and B8 uses on the wider site. No physical development is

proposed. The area of hard standing is enclosed by metal fencing on all boundaries, but hedges screen the southern boundary (that closest to the commercial units).

The hardstanding would create 14 additional parking spaces in connection with the commercial uses.

Principle of Development:

The National Planning Policy Framework has an underlying presumption in favour of sustainable development which is carried through to the local Development Plan. 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.

a) Adopted development plan and NPPF

The site is situated within the designated countryside of settlement limits defined in policy CP9 of the Core Strategy. As such, the site is located within the Wokingham Countryside, and therefore is classified as rural location.

Paragraph 88 of the NPPF is applicable to the development which focuses on supporting the rural economy. It states that planning policies and decisions should enable:

- a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed, new buildings;*
- b) the development and diversification of agricultural and other land-based rural businesses;*
- c) sustainable rural tourism and leisure developments which respect the character of the countryside; and*
- d) the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.*

Part a) of paragraph 88 supports the expansion of *all types* (author's emphasis) of businesses in rural areas, so would encompass the businesses at Newland Farm. However, para 88 (a) it is concentrated on expansion through buildings (conversion and well-designed new buildings). It does not reference the expansion of curtilage. As such, the proposal is also not considered to accord with this subsection of the NPPF.

Assessment then reverts back to local policy CP11 of the Core Strategy which governs development outside of settlement limits in the countryside. The policy states:

In order to protect the separate identity of settlements and maintain the quality of the environment, proposals outside of development limits will not normally be permitted except where:

- 1) It contributes to diverse and sustainable rural enterprises within the borough, or in the case of other countryside based enterprises and activities, it contributes and/or promotes recreation in, and enjoyment of, the countryside; and*

2) It does not lead to excessive encroachment or expansion of development away from the original buildings; and

3) It is contained within suitably located buildings which are appropriate for conversion, or in the case of replacement buildings would bring about environmental improvement; or

4) In the case of residential extensions, does not result in inappropriate increases in the scale, form or footprint of the original building;

5) In the case of replacement dwellings the proposal must:

i) Bring about environmental improvements; or

ii) Not result in inappropriate increases in the scale, form or footprint of the original building.

6) Essential community facilities cannot be accommodated within development limits or through the re-use/replacement of an existing building;

7) Affordable housing on rural exception sites in line with CP9.

Attention has to turn to whether the proposal meets any of the above criteria, noting that 3-7 are not applicable in this case as no built form is proposed.

In terms of criteria 1, relating to the proposal supporting a diverse and sustainable rural enterprises, the proposal does not relate to a rural enterprise or promotes recreation in, or enjoyment of, the countryside. The commercial (B2 and B8) units, which this application seeks to use the hard standing in connection with, operate in the countryside but are not dependant on the countryside to operate. Whilst it is noted that a business such as this will require sufficient space to store stock, which the countryside can provide, it is not a business that is dependant on a countryside location. Whilst the principle of hardstanding was previously acceptable, this was on the basis of it being in connection with an agricultural use which would more closely link to a rural enterprise.

In relation to criteria 2, it states that development should not lead to excessive encroachment or expansion away from the original buildings. The area of hardstanding is located away from all buildings. However, the area of hardstanding is lawful in terms of its placement, and therefore its location is not the subject of this assessment, only its change of use to be used in connection with non-agricultural business.

In light of this, the proposal is not considered to comply with any of the relevant exceptions for development in the countryside, as outlined by policy CP11. Notwithstanding this, attention also has to turn to the overall policy aims of CP11 which are to protect the separate identity of settlements and to maintain the quality of the environment.

Due to the relatively modest scale of the proposal and distance from settlement limits, it would not result in settlement coalescence. In terms of maintaining the quality of the environment, this is a multi-faceted assessment that encompasses material considerations that will be discussed within the report.

b) Local Plan update

The Local Plan Update (LPU), the plan which will supersede the adopted Core Strategy and MDD local plans, is at Regulation 22 stage as it has been submitted to the Planning Inspectorate for examination. As per paragraph 49 of the NPPF:

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)

As a whole, the LPU is still given limited weight, despite its advance stage of preparation. This is owing to unresolved objections to a great number of the policies contained within it. However, those policies highlighted in yellow in the policy table earlier in this report are those that have received less objection and therefore individually are considered to hold moderate weight in the determination of this application. All the others hold limited weight. The policies that hold moderate weight will feed into/ be considered in their relevant sections in this report, where applicable.

c) Summary on principle of development

The proposal does not comply with any of the exceptions for development in the countryside. It also not supported by paragraph 88(a) of the NPPF. However, attention will need to turn as to whether the proposal conflicts or complies with the overarching aims of policy CP11, despite not complying with the exceptions. This will be discussed later in the report and returned to in the conclusion.

Character of the Area:

Policy CP3 of the Core Strategy states that development needs to be of an appropriate scale of activity, mass, layout, built form, height, materials and character to the area together with a high quality of design.

The area of hardstanding is lawful and therefore its presence within the surrounding area has already been assessed and deemed acceptable. Under application 220694 it was stated that the hardstanding could be viewed as a minor degradation of the existing grass field, particularly as it is immediately adjoining and accessible from the commercial buildings and hardstanding to the south. However, it is also relatively well contained and appropriately located immediately alongside Loddon Drive for accessibility purposes. Moreover, it is well concealed by hedgerow, at least on its southern, western and eastern sides.

The change of use (ie. the change in what the vehicles can park on the hardstanding) would not result in a substantial change to the character and appearance of the area.

The stationing of commercial vehicles on the hardstanding would bring commercial activity further into the countryside, however given the modest site area and the containment of the hardstanding, this would not be detrimental to a substantial degree. The proposal would not conflict with the overall policy aim of policy CP11 which is to maintain the quality of the environment; the environment would not be substantially degraded as part of this proposal.

Neighbouring Amenity:

Policy CP3 of the Core Strategy states that development should not be of detriment to the amenities of adjoining land users. This is echoed by policy DH2 of the LPU.

Policy CC06 states that Proposals must demonstrate how they have addressed noise impacts to protect noise sensitive receptors.

The proposal will not see any physical built form and therefore will not result in overlooking, loss of light or privacy to neighbours. Furthermore, there are no direct neighbours that are in close proximity to the site (neighbouring sites over 200m away).

The proposal could result in some level of noise from vehicles parking on the hardstanding. However, the site area is already a lawful area of hardstanding for agricultural activity. Whilst the use of the site for commercial activity could also result in noise, this noise is likely to be temporary (ie comings and goings of vehicles) in the same fashion as the existing lawful use. Furthermore, as the wider site is in a commercial use, there is already a degree of noise in the countryside vicinity from commercial operations.

Highway Access and Parking Provision:

Policy CC07 states that planning permission will only be granted where a development can meet parking provision, the standards of which are in Appendix 2 of the MDD. Development should also not adversely affect the Highway network and promote sustainable transport modes, as outlined in policy CP6 of the Core Strategy. Policy C5 of the LPU states that development proposals should provide and retain vehicle parking (including motorcycles) and cycle parking that caters for the needs of all users (including people with disabilities and visitors) that is appropriate to the location and the scale of development.

The existing access onto Loddon Drive will be retained.

WBC Highways advised that the existing demand for heavy agricultural machinery is no longer required due to change of business operations, it is therefore unlikely lead to displacement of existing agriculture traffic.

It is stated that no expansion of business is proposed, and the applicant has re-confirmed that there would be no increase in staff numbers or operational capacity. The parking is to support the existing businesses only and no expansion of any business is proposed.

As such, WBC Highways have no objection, subject to a condition to the hardstanding remaining ancillary to the commercial use on the wider site (which is contained within the application site blue line) and so can be suitably secured via condition.

Flooding and Drainage:

Policy CC09 of the MDD states that All sources of flood risk, including historic flooding, must be taken into account at all stages and to the appropriate degree at all levels in the planning application process to avoid inappropriate development in areas at risk of flooding.

Policy CC10 of the MDD states that All development proposals must ensure surface water arising from the proposed development including taking into account climate change is managed in a sustainable manner.

The proposal results in a change of use (the use being classified a 'less vulnerable use', as outlined in Annex 3 of the NPPF) within Flood Zone 3b.

The land subject of this application is already an area of lawful hardstanding (as approved under application 220694) for agricultural vehicles/ machinery and the loading/ unloading of livestock.

As the proposal is seeking a material change of use for what the hardstanding can be used for, rather than extending physical perimeter of the hardstanding. As such, the vulnerability classification of the site is unchanged and remains at 'Less Vulnerable'. It is acknowledged that paragraph 181 of the NPPF states that a site-specific flood risk assessment should be provided for all development in flood zones 2 and 3.

No site specific flood risk assessment has been submitted to support this application. However, in respect of this consideration, as the development would involve the change of use of an existing area of permeable hardstanding, not increasing its flood vulnerability and not involving any additional built development, it is not considered that a full assessment is necessary, and the assessment within this statement fulfils this purpose.

Both WBC Drainage and the Environment Agency were consulted on this application and raised no objection to the proposal on this basis, given the existing lawful use, site context and the proposal.

Landscape and Trees:

Policy CC03 of the MDD states that development needs to protect and retain existing trees, hedges and other landscape features. Furthermore, it states that development should incorporate high quality, ideally, native planting and landscaping as an integral part of the scheme

There are no trees/ designated landscaping on the site.

The WBC Tree & Landscape officer have no objection to the proposal, however it is noted that the fencing on the northern boundary which is very industrial looking is adjacent to open fields and will need some form of landscape treatment in accordance with Local Plan Policy CC03.

A landscape condition was included within the approval related to the previous application on this site (220694), for a new hedgerow to be planted along this boundary,

however it doesn't appear that details of this landscaping had been discharged. As such, the condition will be re-attached to this permission requesting landscape details to be submitted within 3 months from the date of the permission.

Ecology:

Policy CP7 of the Core Strategy states that sites designated as of importance for nature conservation at an international or national level will be conserved and enhanced and inappropriate development will be resisted. Policy TB23 of the MDD focuses on enhancing biodiversity.

The Ecologists (WBC and NatureSpace) were consulted and raised no objections to the proposal. No protected species or priority habitats were identified. The WBC ecologist did, however, request that a condition be imposed restricting external lighting within the area of hardstanding without separate permission from the Local Planning Authority. Although there is no indication of external lighting being proposed, it is considered reasonable and necessary to restrict this by condition nevertheless, given the proposed hardstanding is to be used by commercial vehicles in connection with B2 and B8 uses. As such, there could be a risk that the site being used in this way could necessitate for additional lighting that would be inappropriate in the countryside.

Biodiversity Net Gain

From April 2024, a mandatory biodiversity net gain of 10% is applicable on all minor development, unless exempt. One such exemption is development that would not impact a priority habitat and would impact less than 25 sqm of on-site habitats. The applicant claims the development is exempt for this reason, and no information to the contrary has been provided by WBC Ecology. As such, the proposal is not required to comply with mandatory BNG requirements.

Conclusion:

In light of the previous permission at the site, and the existing lawful use of the site, the proposal is considered acceptable and would not conflict with the overarching aims of policy CP11 which dictates development in the countryside. The quality of the environment will not be degraded, as demonstrated throughout this report through compliance/ justification in relation to a number of material planning considerations. The application is therefore recommended for approval.

Community Infrastructure Levy (CIL): When planning permission is granted for a development that is CIL liable, the Council will issue a liability notice as soon as practicable after the day on which the planning permission first permits development. Completing the assumption of liability notice is a statutory requirement to be completed for all CIL liable applications.

The Public Sector Equality Duty (Equality Act 2010): In determining this application the Council is required to have due regard to its obligations under the Equality Act 2010. The key equalities protected characteristics include age, disability, gender, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief. There is no indication or evidence (including from consultation on the application) that persons with protected characteristics as identified by the Act have or will have different needs, experiences, issues and priorities in relation to this particular

planning application and there would be no significant adverse impacts as a result of the development.

RECOMMENDATION

Conditions agreed:	Not required but proposed conditions shared with agent
Recommendation:	Approval subject to the following conditions: 1. Time limit 2. Approved Plans 3. Ancillary use 4. Landscaping 5. No external lighting
Date:	23 September 2025
Earliest date for decision:	19 August 2025

Recommendation agreed by: (Authorised Officer)	
Date:	23/09/25

PLANNING CONSTRAINTS/STATUS

Affordable Housing Thresholds | Total count: 1

#	NAME
1	Outside Development Locations

Scale and Location of Development Proposals | Total count: 1

#	FEATURE_TYPE	NAME
1	Countryside	Countryside

Areas of Search for Sand and Gravel | Total count: 1

#	OBJECTID	OBJECTID_1
1	108	108

Mineral Safeguarding Areas | Total count: 1

#	Type	SubType
1	Sharp Sand and Gravel	Sub-alluvial River Terrace deposits - Indicated resources in area assessed by BGS

Public Rights of Way within Wokingham Borough Consultation Zone | Total count: 1

#	FEATURE_TYPE	CONSULT	STATUS
1	Public Rights of Way in Wokingham Borough	Public Rights of Way Officer, Green Infrastructure Team	Footpath

Major Nuclear Sites Consultation Zone | Total count: 1

#	FEATURE_TYPE	FEATURE_NAME	PLANNING_NOTE
1	Consultation Zone - Major Nuclear Site	AWE: Special Case Zone	ONR also requests to be consulted on planning applications, irrespective of distance from nuclear sites, for special cases. Developments that either introduce a new hazard or change the existing external hazards posed to nuclear sites.

Aerodrome Safeguarding: Heathrow Consultation Zone | Total count: 1

#	Height Band	Wind Turbine	Aviation
1	All works exceeding 150 metres (492.1 feet)	YES	YES

EA Groundwater Zones | Total count: 1

#	FEATURE_TYPE	FEATURE_NAME	CONSULT
1	Groundwater Consultation Zones	Groundwater Consultation Zone 2	Environment Agency (only if application involves contaminated land) – see separate sheet: When to consult the Environment Agency

Flood Zones | Total count: 1

#	flood_zone
1	Flood Zone 3

Historic Flood Extent | Total count: 1

#	FEATURE_TYPE	FEATURE_NAME
1	Environment Agency Historic Flood Outline	Historic Flood Map

BGS Radon Affected Areas | Total count: 1

#	FEATURE_NAME	CONSULT
1	Maximum radon potential is 1-3% of houses	Public Health England

Great Crested Newt Impact Risk Zones | Total count: 1

#	FEATURE_TYPE	FEATURE_NAME	CONSULT
1	Great Crested Newt Impact Risk Zone	Amber	For Householder applications check HH Layer. Consult NatureSpace for all other types of development

Great Crested Newt Impact Risk Zones - Householder | Total count: 1

#	FEATURE_TYPE	FEATURE_NAME	CONSULT
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1	Great Crested Newt Impact Risk Zone - Householder Applications	Amber	This Amber/Red Zone is within 50m of a known pond. Consult NatureSpace for Householder applications
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Great Crested Newt Impact Risk Zones - Minor | Total count: 1

#	FEATURE_TYPE	FEATURE_NAME	CONSULT
1	Great Crested Newt Impact Risk Zone	Amber	Consult NatureSpace for any minor development that intersects a red or amber zone in this layer

SSSI Impact Risk Zones | Total count: 1

#	IRZURL
1	https://irz.geodata.org.uk/IRZ/step2.html?irzcode=0300000500050-res=&location=475108,176315%20(IRZ%20polygon%20centre)

Landscape Character Assessment 2019 | Total count: 1

#	FEATURE_TYPE	Name
1	Landscape Character Assessment 2019	Loddon River Valley with Open Water

Wards | Total count: 1

#	NAME	Closest Approximate Distance
1	Thames Ward	0 m

Parishes | Total count: 1

#	NAME	Closest Approximate Distance
1	Charvil CP	0 m