

Change of use of agricultural land to land for parking associated with adjacent commercial buildings in B2 and B8 use

Newlands Farm, New Bath Road, Twyford, RG10 9RY

On behalf of Belcher Farms.

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1. Introduction

- 1.1. This Planning Statement has been prepared by Pegasus Group on behalf of Belcher Farms ('the Applicant') to support a full planning application for the change of use of an area of existing hardstanding. The hardstanding is located at Newlands Farm and is located adjacent to three former agricultural buildings and hardstanding that is in commercial use but is itself currently in agricultural use associated with the wider agricultural land to the north.

Proposed Development

- 1.2. The application seeks full planning permission for the change of use of the land with the following description of development:

"Change of use of agricultural land for parking associated with adjacent commercial buildings in B2 and B8 use."

- 1.3. The proposed scheme relates to an existing area of hardstanding that has existed since 2019. Originally it was proposed as part of the commercial use however it was removed from the application site prior to this development being approved and as such remained in agricultural use. It was then proposed to retain the hardstanding for agricultural purposes, specifically a handling system for cattle and sheep and loading/unloading livestock when being transported as well as the storage of farm machinery. The hardstanding was retrospectively approved for this purpose under application 220694 in May 2022 and has been used for this purpose since.
- 1.4. It is now proposed to change the use of the land to allow for its use as parking. The site is located adjacent to three former farm buildings that are now in commercial use within either the B2 or B8 use class.

Planning Application Documents

- 1.5. In addition to this Planning Statement, the planning application submission comprises the following:
- Application Forms and Notices
 - Location Plan
 - P19-0392_10 Site Plan
 - P19-0392_11 Block Plan

2. The Application Site

- 2.1. 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, a private road that is under the ownership of the applicant.
- 2.2. The southern part of the site closest to New Bath Road includes a number of buildings and areas of hardstanding that are used for parking, access and ancillary storage. The buildings and hardstanding are in use as either Use Class B2 (Industrial) or B8 (Storage and Distribution) commercial units. The remainder of the site to the north of this area is in agricultural use, consisting primarily of open fields.
- 2.3. The exception is the application site which comprises an area of permeable gravel hardstanding directly adjacent to the commercial units but remains in agricultural use. The hardstanding is lawful, having gained planning permission in 2022 to be used for agricultural purposes however given that it borders, and already has access from, the adjacent hardstanding associated with the commercial uses, it could be used in connection with these uses with no further building operations required.
- 2.4. The site is located within the countryside, outside the development limits but not within the Green Belt. It is wholly within Flood Zone 3.

3. Relevant Planning History

- 3.1. The planning history for the site relates primarily to the buildings and land that are now used for industrial purposes. Various applications for the erection of these buildings as agricultural buildings were submitted and approved between 2006 and 2015. Application **191788** was then submitted to regularise these as industrial buildings under Use Class B2, which although refused by the Local Planning Authority in November 2019 was allowed on appeal in January 2021 under appeal reference **APP/X0360/W/20/3252447**.
- 3.2. It should be noted that an application was originally submitted to regularise this development under application **190672** which included two additional areas; an area to the south of the buildings between them and New Bath Road, and the application site. The application was withdrawn, and size of the site was reduced before the application that was eventually determined was submitted.
- 3.3. More recently, application **242554** was submitted in October 2024 to vary conditions of the development allowed on appeal which proposed amendments to the approved parking layout and additional ancillary storage areas. This was approved in December 2024. It is important to note that this application did not reduce parking provision at the suite
- 3.4. As it was withdrawn from the scheme, the hardstanding was not approved under the above applications therefore application **220694** was submitted in March 2022 in order to regularise this. This permitted the hardstanding as it exists today for agricultural purposes, specifically to house a handling system for cattle and sheep and for the loading/unloading livestock into trailers when being transported. It has also been used for the storage of agricultural vehicles and machinery.

4. Proposed Development

- 4.1. The proposed development comprises the change of use of the area of hardstanding to the north east of the commercial units from its existing agricultural use to a commercial use ancillary to the lawful B2/B8 use of the buildings and surrounding hardstanding. The hardstanding will be used as an additional parking area in connection with these uses.
- 4.2. The hardstanding as existing is suitable for parking, one of its existing uses being the storage of heavy agricultural machinery. As such, no operational development is required to utilise it for parking and the proposed development only needs to concern the use of the land.
- 4.3. The area is also already accessible from the below existing access onto Loddon Drive which as with the hardstanding was required for its existing use by agricultural vehicles including those loading and unloading livestock. No access adjustments are therefore required to facilitate the development. As can be seen, it is already separated from the agricultural land to the rear through an existing fence.



- 4.4. Although the hardstanding was originally required for agricultural purposes, due to changes to the operation of the farm business and where livestock is kept it is no longer required in connection with that use. This will be explained further where relevant below.
- 4.5. As such, the application only needs to be concerned with the planning merits of the change of use of the land. The hardstanding itself together with its access and boundary treatment are all existing and no operational development is required in order to facilitate the change of use.

5. Planning Policy Framework

- 5.1. This section identifies the key relevant planning matters contained within the Development Plan and other material planning considerations pertinent to the determination of the planning application.
- 5.2. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that all planning applications be determined in accordance with the development plan unless material considerations indicate otherwise. The current adopted Development Plan for Wokingham relevant to the site consists of the Core Strategy (2010) and the Managing Development Delivery Local Plan (2014).
- 5.3. The Council has been preparing a Local Plan Update which was submitted to the Planning Inspectorate in February 2025. Although Inspectors have been appointed, Hearing Sessions are yet to commence and as the policies within the plan have not yet been subject to examination, only limited weight can be given to them at present. Similarly, it is within the Neighbourhood Area of the Charvil Neighbourhood Plan which is being prepared but has yet to be submitted for examination.
- 5.4. The National Planning Policy Framework (NPPF) is a material consideration in the determination of all planning applications.
- 5.5. The policies and sections of the adopted Development Plan documents and the NPPF that are considered relevant to the proposals are set out below.

Development Plan

Core Strategy

- 5.6. The Core Strategy was adopted in January 2010 and provides the strategic planning policy framework for Wokingham until 2026. It contains the spatial vision and policies to promote sustainable development in the Borough and guide planning decisions.
- 5.7. From the policies map that sits alongside the Core Strategy it can be seen that the application site lies close to but outside of the settlement boundaries of Twyford and Charvil. The site is not allocated for residential or any other form of development. It is therefore regarded as 'countryside' in planning policy terms.
- 5.8. The policies map also shows that the site is not located within a Conservation Area, and there are no landscape, ecology or other heritage designations that directly affect the site. The site is located within Flood Zone 3.
- 5.9. **Policy CPI (Sustainable Development)** sets a number of over-arching principles regarding development proposals in the Borough. Planning Permission will be granted for development proposals that:

- *Maintain or enhance the high quality of the environment.*
- *Ensure the provision of adequate drainage.*
- *Avoid areas of best and most versatile agricultural land.*
- *Avoid areas where pollution (including noise) may impact the amenity of future occupants.*
- *Avoid increasing (and where possible reduce) risks of or from all forms of flooding (including groundwater).*
- *Provide attractive, functional, accessible, safe, secure and adaptable schemes.*
- *Demonstrate how they support opportunities for reducing the need to travel, particularly by private car in line with CP6.*

5.10. The supporting text to the policy highlights that development should enhance the overall sustainability of the area through minimising impact on the environment. It is important that proposals do not harm this or adversely affect the quality of life of residents, workers and visitors.

5.11. **Policy CP3 (General Principles of Development)** sets a number of general principles for development which proposals are expected to follow. The following list sets out those considered relevant to the development. Planning permission will be granted for proposals that:

- *Are of an appropriate scale of activity, mass, layout, built form, height, materials and character to the area together with a high quality of design without detriment to the amenities of adjoining land users including open spaces or occupiers and their quality of life.*
- *Provide a functional, accessible, safe, secure and adaptable scheme.*
- *Have no detrimental impact upon important ecological, heritage, landscape (including river valleys) or geological features or water courses.*
- *Use the full potential of the site and contribute to the support for complementary facilities and uses.*
- *Contribute to a sense of place in the buildings and places themselves and in the way they integrate with their surroundings (especially existing dwellings) including the use of appropriate landscaping.*
- *Provide for a framework of open space in secure community use achieving at least 4.65ha/1,000 population provision together with recreational/sporting facilities in addition to private amenity space.*

5.12. **Policy CP9 (Scale and Location of Development Proposals)** states that the scale of development proposals in the Borough must reflect the existing or proposed levels of facilities and services at or in the location.

5.13. **Policy CP11 (Proposals outside Development Limits)** states that in order to protect the separate identity of settlements and maintain the quality of the environment, proposals outside the development limits will not normally be permitted. A list of exceptions is given, of which the following are relevant to the proposals:

'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 if, and enjoyment of, the countryside.

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

5.14. The supporting text to the policy sets out that *"Restricting development outside of development limits also helps protect the separate identity of settlements and maintain the quality of the borough's environment...Preventing the proliferation of development away from existing development limits is important, as they are not generally well located for existing services and facilities. Proposals for development, which would be an increase over what currently exists (outside development limits) are likely to lead to increased use of the private car as they are poorly served by other transport modes..."*

Managing Development Delivery Local Plan (MDD)

5.15. The MDD was adopted in February 2014, building on the WCS and including more detailed policies for development in the Borough. The following policies are considered relevant to the consideration of this application.

5.16. **Policy CC09 (Development and Flood Risk)** 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 all areas at risk of flooding. Development proposals in Flood Zones 2 and 3 must take into account the vulnerability of the development. New development in areas of flood risk will be supported where it can be demonstrated that the development will be safe for its lifetime, taking into account the vulnerability of its users, not increase flood risk in any form elsewhere and, where possible, reduce flood risk overall and incorporate flood resilient and resistant measures into the design. A flood risk assessment is required for proposals in areas of known historic flooding.

5.17. **Policy TB21 (Landscape Character)** states that proposals must demonstrate how they have addressed the requirements of the Council's Landscape Character Assessment. Proposals shall retain or enhance the condition, character and features that contribute to the landscape.

NPPF

- 5.18. **Paragraph 88** supports a prosperous rural economy, supporting the sustainable growth and expansion of all types of business in rural areas, and the development and diversification of agricultural and other land-based rural businesses.
- 5.19. **Paragraph 170** states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk. Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.
- 5.20. **Paragraph 174** sets out that the aim of the Sequential Test is to steer new development to areas with the lowest flood risk from any source. Development should not be permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding.
- 5.21. **Paragraph 176** states that applications for some minor development and changes of use should not be subject to the Sequential Test. Footnote 62 confirms that this applies to all applications for changes of use, except for changes of use to a caravan, camping or chalet site, or a mobile home or park.
- 5.22. **Paragraph 181** states that when determining planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Site specific flood risk assessments should support applications where appropriate.
- 5.23. **Paragraph 187(b)** states that planning decisions should contribute to and enhance the natural and local environment by recognising the intrinsic character and beauty of the countryside.

6. Planning Assessment

6.1. This section of the Planning Statement sets out the main planning considerations for this application. As the development involves the change of use of an existing area of hardstanding only, there are no ecological constraints to the proposal and no trees are affected. The site contains no designated or non-designated heritage assets, and it would have no impact on the Charvil Conservation Area. There are no nearby residential properties that would be affected.

6.2. Consequently, the main considerations of the proposal are considered to be the principle of the development, its impact on the character and appearance of the area and the landscape and highway safety. The appeal decision that allowed the surrounding commercial development in January 2021, reference **APP/X0360/W/20/3252447**, is material to the consideration of the proposals and will therefore be referenced where relevant.

Principle of the Development

6.3. Core Strategy Policy CP11 concerns proposals outside the development limits and allows for diverse and sustainable rural enterprises, provided that it does not lead to excessive encroachment or expansion of development away from the original buildings.

6.4. It is acknowledged that the proposal to change the use of the land from an agricultural use to an ancillary commercial use is not a 'rural enterprise' as Policy CP11 applies. However, the comments of the Inspector in allowing the change of use of the buildings to commercial industrial uses are relevant to this matter. Paragraphs 15-18 of the appeal decision establish that the Inspector did not consider the site to be suitable for the development proposed, having regard to the locational and accessibility requirements of the Core Strategy. In particular, Paragraph 16 highlights that the development would not be for a rural or recreational enterprise and accordingly would conflict with the requirements of Policy CP11.

6.5. However, Paragraph 19 references Paragraph 83 of the NPPF (now Paragraph 88) in enabling the sustainable growth and expansion of all types of business in rural areas in supporting a prosperous rural economy, not only rural businesses. At Paragraph 20 the Inspector then acknowledges that the NPPF 'establishes a more sympathetic approach to the location of economic activities within rural areas' than the Core Strategy, and that:

"Despite the locational and accessibility shortcomings identified above, I find that the Framework lends considerable support to the proposal and consequently, I attached substantial weight to this matter. Moreover, having regard to the Framework, the approach within the CS is not entirely consistent with up-to-date national policy. Consequently, I find this reduces the weight that I attach to the relevant policies in the CS and the conclusions identified above."

6.6. As such, the Inspector found that although the proposed change of use of the buildings in land was contrary to the Development Plan, the Development Plan in restricting business use

in the countryside to rural businesses only was not consistent with the NPPF which supports the sustainable growth and expansion of all types of businesses in rural areas.

- 6.7. These findings are highly relevant to the current proposals, and the policy wording with both the Core Strategy and the NPPF remains the same today. Although the proposed development is not for a 'rural enterprise' it is for development associated with existing uses that a Planning Inspector has found to be acceptable in this location.
- 6.8. The increase is considered to be sustainable as it is directly adjacent and well related to the existing hardstanding and will not lead to an excessive expansion, given that the hardstanding will not extend any further north than an existing storage area located on the western side of the site. In numerical terms, the site area of the established commercial land is 12,804m². The area of the hardstanding proposed for change of use is 1,789.96m². This would represent only a 13.9% increase in the overall size of the site.
- 6.9. The development proposals are therefore proposed to represent the sustainable expansion of existing businesses in a rural area and are therefore in accordance with Paragraph 88(a) of the NPPF. Although the development would not accord with Policy CP11 by virtue of it not being related to a rural or recreational enterprise, it would be related to an existing enterprise and would not lead to excessive expansion of development away from the existing buildings and hardstanding. It is therefore considered that the policy conflict is minimal, and greater weight given to the support from the NPPF, which would be consistent with the approach taken by the Inspector in allowing the previous appeal.
- 6.10. Taking all matters into consideration, the proposed change of use of an existing area of hardstanding is acceptable in principle in this location.

Character, Visual Amenity and Landscaping

- 6.11. The proposed change of use required no alterations to the existing access or hardstanding and when not in use the site would therefore appear exactly the same as it does today. The existing landscaping will also be unaffected.
- 6.12. The change in the use of the land has the potential to change the character of the site through its use for commercial purposes instead of agricultural. It would however only be used as an overflow parking area – not for storage – and as such any visual impact through the parking on vehicles will only be temporary. The character of the site will be exactly the same as the existing areas that are used for parking at Newlands Farm.
- 6.13. The Inspector at Paragraphs 11 and 12 of appeal decision **APP/X0360/W/20/3252447** gave his view of the impact on the character of the area of parking and external storage, noting large areas of external storage and large areas of the site given over to hardstanding for associated car parking and vehicular use. As the visual impact of the proposal would have a similar impact to these areas of the approved development, the comments of the Inspector are material to this proposal.

6.14. At Paragraph 11 the Inspector acknowledges that the result of the parking and storage is that:

“...the site coverage of the proposed use is more expansive and, as a consequence, visually very different to the authorised agricultural use. Despite this, through the use of palisade fencing, the storage areas are contained and generally relate well to the buildings with which they are associated.”

6.15. Paragraph 12 then states that:

“...the appeal site is well screened from New Bath Road due to the presence of a dense belt of mature trees between the site and the adjacent highway. Accordingly, when viewed from the east, south and west, the appeal site and its associated buildings and external storage have no effect on the character and appearance of the area.”

6.16. Paragraph 13 the concerns the impact on the development from the north along Loddon Drive, stating that:

“...when viewed from, this area, the site is seen against the backdrop of the mature trees and the surrounding countryside. Due to the scale of the proposed use and the low-lying nature of the site coverage, in the context of the mature landscaping and established countryside, I find that the site is subordinate to the verdant surroundings. Accordingly, I am satisfied that the proposed use would not demonstrate an excessive encroachment or expansion into the countryside. Instead, it would represent a well-contained use that would not detract from the surrounding openness.”

6.17. All of these comments are relevant to the proposals. The Inspector acknowledged that the covered of the proposed use was more expansive than the agricultural use – as the proposed use would likely be – however the hardstanding areas were considered to be well contained and related well to the buildings with which they are associated. This would be the same for the application site, which is contained in the same way as the commercial site and relates just as well to the associated buildings.

6.18. The screening from New Bath Road remains, and accordingly, as with the established use, the development would have no impact on the character and appearance of the area from the east, south and west of the site. The site of the change of use is adjacent to Loddon Drive however the Inspector found that the wider established site would be subordinate to its surroundings and was satisfied that the proposed use would not demonstrate an excessive encroachment or expansion into the countryside, instead finding that it would represent a well-contained use that would not detract from the surrounding openness.

6.19. The backdrop of the existing mature trees and surrounding countryside remains the same as when the appeal proposal was considered, and the development would not significantly alter the scale of the development. The site as a whole would remain subordinate to its surroundings and – as set out above – would not result in excessive encroachment or expansion into the countryside. Furthermore, the hardstanding is existing and no additional

built development is required to facilitate the development. It is therefore considered that the same considerations apply to the proposed development as to the originally approved development, and the site will remain a well contained site that will not detract from the surrounding openness.

- 6.20. In the original approval of the hardstanding, Officers recognised that the site is well contained and appropriately located alongside Loddon Drive for accessibility purposes. Moreover, Officers set out how it is well concealed by hedgerow and was described as a 'minimal disruption' to the character of the countryside. Although its use is proposed to change, these elements remain the same as when originally assessed.
- 6.21. Viewed in the context of the existing site and the previous comments of the Inspector, it is therefore considered that the development would not have an unacceptable additional impact on the character and appearance of the surrounding area. The development would therefore accord with the relevant parts of Policies CP1, CP3, CP11, CC03 and TB21, and the NPPF.

Highway Safety Impacts

- 6.22. The wider site is provided with parking, the layout of which was amended by application **242554** in order to accommodate additional storage areas. Although the Highways Officer was satisfied with the level of parking provided under that application, parking and access can at times be problematic at the site particularly when a business is receiving a delivery or customers are dropping off/picking up vehicles for repairs. As such, an additional parking area, which would be used by employees, would aid with space and flow around the site which would have associated highway safety benefits.
- 6.23. The site was originally approved for agricultural use and as their consultation response to the original proposal states that as the hardstanding is ancillary to the agricultural use there are no highways issues. These comments should still stand, given that the land remains in ancillary use and access is exactly the same. No expansion of any business at the site is proposed – the additional hardstanding would be ancillary to the existing development on the site and no increase in traffic would result.
- 6.24. The development would therefore not result in any highway safety impacts and would aid the movement of vehicles around the site. The development would therefore accord with Policies CP6 and CC07, and the NPPF.

Flood Risk

- 6.25. The site is as acknowledged in Flood Zone 3 however the hardstanding is existing and the flood vulnerability classification for the site is unchanged.
- 6.26. Paragraph 176 of the NPPF sets out that applications for changes of use should only be subject to the sequential test and exception test if they involve residential uses such as

caravans, camping sites, mobile homes and park homes. Neither the sequential test nor the exception test is therefore applicable to the proposed development.

- 6.27. 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. 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 fulfills this purpose. Developments such as the proposed will not result in any flood safety concerns and will not have any impact on flood risk elsewhere.
- 6.28. As such, the development accords with Policy CC09 and the NPPF.

Ecology

- 6.29. The application site is hardstanding in its entirety at present and does not contain any areas of potential habitat. Ecology surveys are therefore not necessary for the change of use of such land with no built development proposed.
- 6.30. The development is also below the threshold for when Biodiversity Net Gain is required. Development is exempt when it does not impact a priority habitat and impacts less than 25m² of on-site habitat. The site contains no on-site habitat and as such is exempt.

7. Summary and Conclusions

- 7.1. The proposed development involves the change of use of an existing area of hardstanding from agricultural use to allow it to be used for parking ancillary to the adjacent commercial uses at Newlands Farm. As such, the planning application is only concerned with the use of the land; no building operations are proposed.
- 7.2. It is considered that the previous appeal decision at the site, reference **APP/X0360/W/20/3252447** is material to the consideration of the proposals, in particular matters concerning the principle of the development in this location and its impact on the character and appearance of the area. It is considered that this appeal decision establishes both that the development is acceptable in principle in this location and will not have an adverse impact on the character and appearance of the area.
- 7.3. The development would not result in an adverse impact on residential amenity, highway safety, flood risk, heritage or ecology. It is exempt from Biodiversity Net Gain as it does not involve the loss of any ecological habitat.
- 7.4. The development therefore accords with the local and national planning policies and guidance that are relevant to the proposals. It is therefore respectfully requested that this planning application be **approved**, thereby granting planning permission for the proposed development.

Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

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