



ET Planning

Planning Statement

Client:
Sid Nunns

Bluebell Farm

Commonfield Lane, Wokingham, RG40 4PR

*Change of use of land to allow for stationing of
mobile homes for permanent residential purposes*

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Appendix 7 – PDAS for 240788, Officer Report, Decision Notice and Appeal Statement

1. Introduction

- 1.1 This statement is produced to support a planning application for the change of use of the land to for mobile homes to be used by over 55s.
- 1.2 This planning statement will cover the background to the application and provide the necessary information to enable its determination by officers at the Council. It will consider the proposal in light of relevant planning policies and other material considerations. The conclusion reached is that key material considerations and the wider objectives of National and Local planning policy support the grant of permission.
- 1.3 In addition to this planning statement, the application is accompanied by the appropriate planning application forms and ownership certificate, duly signed and completed, and the following documents by Martin Peacock Architectural Services, Landarb and Darwin Ecology:
- Site Location Plan
 - Site Layout as Existing
 - Site Layout as Proposed
 - Tree Survey/Arboricultural Impact Assessment
 - Ecological Information
- 1.4 The relevant application fee will be submitted by the applicant separately.

2. Site Location and Description

- 2.1 The application site is a large site accessed via an existing access.
- 2.2 The application site is not within any designated settlement boundary however, the locality features residential development comprising dwellinghouses and notably features a residential caravan park at Honeysuckle Lodge and Pine Lodge which includes 8 pitches for Gypsies and Travellers.
- 2.3 The opposite side of Commonfield Lane is the boundary of the Arborfield Garrison Strategic Development Location (SDL) where new dwellinghouses have been built and occupied. In the wider area, there are a number of single caravan pitches as well as the larger residential mobile home park at Robinson Crusoe and California Country Park, both along Nine Mile Ride.
- 2.4 The eastern application site boundary adjoins an area of woodland known as Longmoor Bog which is a Site of Special Scientific Interest (SSSI), the site is also within 5km of the Thames Basin Heath SPA.

3. Planning History

- 3.1 Application Ref 'F/1995/63171' for 'Proposed demolition of existing dwelling and erection of replacement 3no.bedroom dwelling' Refused 05/03/1996.
- 3.2 Application Ref 'F/1997/65373' for 'Proposed single storey and rear extensions to dwelling' Approved 07/05/1997
- 3.3 Application Ref 'F/1997/66278' for 'Proposed erection of replacement dwelling' Approved 21/11/1997

- 3.4 Application Ref 'F/1998/67969' for 'Proposed erection of dwelling – amendment to F/1997/66278' Approved 24/08/1998
- 3.5 Application Ref 'F/2000/2015' for 'Proposed erection of detached double garage and installation of velux windows in roof of dwelling (retrospective)' Approved 04/09/2000
- 3.6 Application Ref '152107' for 'Application for a certificate of existing lawfulness for the use of existing chalet or mobile home as separate residence to the main dwelling' Refused 08/01/2016 (Appeal Reference **APP/X0360/X/16/3153354** Appeal Allowed 20/01/2017) confirming use as C3 dwellinghouse.
- 3.7 Application Ref '222373' for 'Application for a certificate of existing lawful development for change of use of land to a caravan site' Refused 6/10/2022
- 3.8 Application Ref '223783' for 'Full application for the proposed erection of no1. replacement dwelling and car port, following demolition of existing dwelling' Approved 10/03/2023. This is the existing dwelling to the northeast of the site, exempt from this application site area.
- 3.9 Application Ref '232420' for 'Application for submission of details to comply with the following conditions of planning consent 223783 dated 10/03/2023. Condition 3 relates to materials, 6 to electric vehicle charging, 7 to cycle parking and 9 to tree protection' Approved 16/11/2023.
- 3.10 Application Ref '231330' for 'Full application for the proposed change of use of land for stationing no. 14 static mobile home caravans for permanent residential use following demolition of existing dwellinghouse' Refused 16/08/2023.
- 3.11 Application ref 240788 for 'Change of use of the land for stationing of 9no. mobile homes for permanent residential use for people over the

age of 55 years.’ – Refused 28/05/2023 – Appealed – Appeal dismissed – 08/05/25

4. Development Proposals

- 4.1 The proposal seeks to change the use of the site to a residential mobile home caravan site, which will facilitate the siting of 9 static mobile home caravans for permanent residential use (also known as a residential ‘park home’ site). This would coincide with the demolition of the existing C3 residential dwelling within the centre of the site however, the existing residential unit to the north-east of the site is to be retained.
- 4.2 The proposal would provide 9 individual mobile home units, each with their own private garden and parking spaces. These are to be only occupied by the age of 55+ and their dependent. This would be secured by conditional control upon the approval of any planning consent and would form the operative part of the permission.

5. Policy Assessment

- 5.1 **National Guidance and Need in Finchampstead:** The National Planning Policy Framework (NPPF) is a relevant material consideration to the application. The purpose of the planning system is to contribute to the achievement of sustainable development. So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development. Paragraph 38 of the NPPF states that “Local planning authorities should approach decision on proposed development in a positive and creative way” and “at every level should seek to approve applications for sustainable development where possible”. Paragraph 123 of the NPPF comments that planning should “make effective use of land” in “meeting the need for homes and other uses, whilst safeguarding and improving the environment and ensuring safe and healthy living conditions”.
- 5.2 Paragraph 60 confirms the Government’s objective to boost the supply of housing, and paragraph 8 identifies the three objectives of sustainable development, as economic, environmental, and social.
- 5.3 **Preliminary Matters:** It is important to note that a number of matters including principle of development, need for the accommodation etc were discussed in significant detail as part of application ref. 240788 and subsequently as part of appeal ref. APP/X0360/W/24/3356397. In the interests of brevity, these matters will not be re-examined as part of this application. The original planning statement, officer report, decision notice and appeal decision can be found in **Appendix 7**. In summary, there is a defined need for the development and a number of sustainable transport options are accessible from the site which will further improve as the Arborfield Garrison District Centre continues to be built out.

5.4 Since the dismissal of the previous appeal, the applicant has undertaken a number of changes in relation to the scheme:

- The red line has been reduced
- Layout alterations
- Use of an existing access

5.5 **Principle of Development:** Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the Development Plan, unless material considerations indicate otherwise.

5.6 The Development Plan, in this instance, comprises the following:

- Adopted Core Strategy Development Plan Document (2010) ('CS');
- Wokingham Borough Managing Development Delivery Local Plan (2014) ('MDD') and;
- Finchampstead Neighbourhood Plan (September 2023) ('FNP')

5.7 It must be noted that Wokingham Borough Council are updating their Local Plan. This Local Plan has not been adopted yet and therefore less weight can be given to it however, relevant policies are still required to be given weighting in the consideration of the application.

5.8 The stationing of mobile homes does not fall under the term operational development for the purposes of S55 of the Town and Country Planning Act (the Act) and as such the determination of this application pertains to the assessment of the change of use of the land in question.

- 5.9 Policy TB05 of the MDD seeks for proposals for residential development to provide an appropriate housing mix which reflects a balance between the underlying character of the area and both the current and projected needs of households. Paragraph 3.19 of the MDD notes caravans and mobile homes are a residential use to this extent and paragraph 3.20 goes on to state proposals for caravans and mobile homes will be assessed on a site-by-site basis.
- 5.10 Policy CP2 of the Local Plan seeks to ensure that new development contributes to the provision of sustainable and inclusive communities to meet long term needs. This policy states that planning permission will be granted for proposals that address the requirements of various population groups including an **ageing population**, particularly in terms of **housing**, health and wellbeing.
- 5.11 The Inspector agreed as part of appeal ref. APP/X0360/W/24/3356397 that the proposed accommodation would meet the need of the ageing population within the Parish and the Borough (being a specialist type of accommodation by definition).
- 5.12 The condition of restricting occupancy to those over the age of 55 (and or their partner/a single dependent) would ensure the housing could only support an ageing population meeting the objectives and criteria of CP2 and TB05. CP2 is clear that planning permission **will be granted** for this type of development, as such if the LPA requires a planning balance to be undertaken compliance with CP2 would weigh substantially in favour of the development.
- 5.13 Notwithstanding, the above it is acknowledged the application site is beyond any settlement boundary and as such CC02 of the CS and CP11 of the MDD is relevant. CP11 seeks to protect the separate identity of settlements and maintain the quality of the environment.

CP11 states development would not normally be permitted except in certain circumstances.

- 5.14 None of the circumstances listed in CP11 would apply to the proposal, however the development would align with the aims of the policies. Notably, the application site itself does not feature a high level of environmental quality being comprised of a dwellinghouse and its maintained curtilage (comprising previously developed land as per the NPPF 'PDL').
- 5.15 The existing site features a significant amount of hardstanding and ancillary buildings. Caravans are also present in the south-eastern corner of the site. Any ecological or countryside appearance purely arises from the residential lawn (grass) surrounding the curtilage and does not form part of any wider landscape.
- 5.16 The site is enclosed by woodlands to the east (outside of application site boundary) and a neighbouring caravan site to the south/south-west and as such any development of the site is not likely to enable any future development to the east (towards Finchampstead). Policy GS1 of the FNP specifically provides locations that contribute to the settlement gaps within the Parish. The application site is not within or adjacent to any of these identified sites. As such, the development of the site (comprising PDL) being enclosed by woodland and other development would in no way undermine the objectives of CP11 of the CS and GS1 of the FNP.
- 5.17 It should be noted CC02 allows development in the countryside adjacent to development limits where it respects the transition of built-up areas and the countryside. The nature of the development would respect the development limits of both Finchampstead and Arborfield SDL owing to the fact the locality already features residential development and that development cannot continue any

further east in the future (there is no access beyond the private track other than a footpath). The site does not expand into any areas not considered PDL.

- 5.18 The development is particularly sympathetic to the environmental qualities of the surrounding countryside owing to the mobile homes being a single storey and of a modest size whilst the site itself is not publicly visible from the main road. To be explicit, the site itself cannot be considered to comprise any relevant countryside or verdant character featuring several buildings and hardstanding – the proposal would provide more native hedgerow species and increased soft landscaping appropriate to the location, improving environmental quality compared to existing site circumstances.
- 5.19 It should be noted the NPPF does not provide an ‘in principle’ general resistance to development in the countryside purely owing to its location. Paragraph 180 of the NPPF states planning policies and decisions should contribute to and enhance the natural environment by: protecting and enhance valued landscapes and as stated by ‘recognising’ intrinsic character and beauty. This is not the same as all areas of the countryside being protected in principle or the assumption that all areas of the countryside are intrinsically beautiful, the impact to the countryside is a character/landscape consideration to be assessed.
- 5.20 The proposal would not conflict with the aims of CC02 and CP11 of the Local Plan. This assessment would align with an inspectors reasoning for the application of CP11 in allowed appeal decision **APP/X0360/W/23/3331651** (dated 06/03/2024) (Appendix 1) which stated that in paragraph 10 *"the reference to schemes not 'normally' being permitted seems to be a deliberate insertion aimed at providing some flexibility. This may, perhaps, be in circumstances where a scheme does not quite align with all the*

criteria in the policy but would nevertheless maintain the quality of the environment". This decision aligns with the appeal decisions provided in the previous submission detailing the flexibility of this policy, and these have also been provided with this application (Appendices 2 – 6).

- 5.21 The development would align with the objectives of CP11 preserving the separate identity of the settlements and maintaining the quality of the environment, as such it represents a development which complies with CP11.
- 5.22 Notwithstanding the above, the emerging Local Plan is updating policy CP11 in the form of SS13. This policy will seek to include previously developed land within the exceptions of the countryside policy. The site comprises a dwellinghouse and its curtilage, and therefore the land would be considered previously developed land, aligning with the aims of this policy.
- 5.23 In summary, the proposal would align with the aims of policies CP11, CC02 of the Local Plan and AHD1 of the Finchampstead Neighbourhood Plan. Material considerations also weigh in favour of this development. The proposal would also comply with policies SS13 of the emerging Local Plan. Although this is given less weight also comprises part of the policies to be considered for the application.
- 5.24 **Sustainable Development:** NPPF Paragraph 8 outlines the three interdependent aims of the planning system. NPPF Paragraph 8.a) states that the planning system should ensure that the right type of land is available at the right time. As has been discussed as part of appeal ref. APP/X0360/W/24/3356397, there is a defined need for this type of accommodation and so the proposal accords with this aim.

- 5.25 NPPF Paragraph 8.b) outlines the social objectives of the planning system. The proposed caravans will provide accommodation for a group of older adults at a similar stage of their life, creating a community of people who likely have similar interests and ways of life. This has the potential to foster high quality social connections, allowing the proposal to accord with this aim.
- 5.26 NPPF Paragraph 8.c) outlines the environmental objectives of the planning system. As part of application ref. APP/X0360/W/24/3356397, the Inspector agreed that the site constituted Previously Developed Land (PDL). In line with wider Government aspirations to ensure that PDL is used for development, this allows the proposed development to accord with this aim.
- 5.27 Policies CP1, CP4, CP6, CP9 of the CS seek to base development where it has sustainable credentials in terms of access to local facilities and services.
- 5.28 The site is within 0.25km of the Arborfield SDL boundary, approved as a sustainable mixed-use development including the delivery of around 3500 dwellings, employment, appropriate retail facilities, social/physical infrastructure, measures to maintain the separation of settlement boundaries and notably measures to improve accessibility by non-car transport modes.
- 5.29 Therefore, due to the application site being located opposite the development boundary for the Arborfield SDL, it is considered to be a sustainable location in terms of access and services. The site features a cycle store and is also in close proximity to pedestrian footpaths and pavements, enhancing its accessibility.
- 5.30 Sustainability issues were a key point of discussion as part of appeal ref. APP/X0360/W/24/3356397 (**Appendix 7**). Paragraphs 37 – 46 discuss the sustainable transport options available to the site at

length. In summary, the Inspector stated that the site offered opportunities for walking and cycling, walking routes are acceptable and would be useable by prospective residents and that there are bus services in the nearby area.

- 5.31 Concluding on this matter, the proposed development is considered to constitute sustainable development.
- 5.32 **Character and Appearance of the Area:** Policy CP3 requires development to be appropriate to the character of the area and be of a high-quality design. To this extent the locality comprises a semi-rural location with residential development. The lawful use for the site comprises a dwellinghouse and an ancillary mobile home. Part of the site is covered by hardstanding, which comprise the driveway leading to the house.
- 5.33 Policy D2 of the Neighbourhood Plan seeks to maintain the separation of settlements and to complement the characteristics of the landscape in the immediate locality through retaining the proportion, scale and space between residential buildings, and the use of appropriate plant species in a comprehensive landscape scheme with appropriate boundary treatments to integrate with the rural character.
- 5.34 In addition to this, as part of this re-submission, more of the units have been located to the rear of the site compared to the previous scheme with 2 no. units now being located along the roadside, whereas as the scheme considered as part of the aforementioned appeal had 3 no units in close proximity to the road.
- 5.35 It is noted that as part of application ref. APP/X0360/W/24/3356397, the Inspector did consider that there was some harm to the character of the area. However, given the Council's lack of a 5 Year Housing Land Supply which results in the 'tilted balance' being engaged, the

harm is considered to be outweighed by the provision of new residential units.

5.36 For the reasons set out above, the proposed development is considered acceptable in character terms.

5.37 **Residential Amenity – Overlooking, Loss of Light and Overbearing:** Policy CP3 seeks to protect neighbouring residential amenities. The closest neighbouring properties are the chalet located to the north-east of the site, 'The Finches' and the caravans present and Honeysuckle Lodge.

5.38 The caravans would be single storey and would therefore not be able to look over any neighbouring properties or their private amenity space. The caravans would be sat back from the shared boundary, away from the adjoining properties. It is considered there would be an appropriate separation distance between the neighbouring properties and the caravans.

5.39 No concerns were raised in relation to amenity as part of application ref. 240788 and as such, the impact of the proposal on amenity is considered acceptable.

5.40 **Trees and Landscaping:** Since the submission of the previous application, it is noted that a Tree Preservation Order (TPO) has been placed on the trees to the front of the site. The Inspector also raised concerns in relation to the impact of the proposal on trees as part of appeal ref. APP/X0360/W/24/3356397.

5.41 In response to this, a tree survey/AIA by LandArb has been submitted in support of this application.

5.42 The statement details how the proposed development does not require any tree works to the retained trees. Tree protection measures and mitigation measures are proposed within the report

that can be secured by condition in the event of a grant of planning permission.

- 5.43 Indicative landscaping is shown on the proposed plan, this can be secured by condition in the event of a grant of planning permission.
- 5.44 This allows the proposal to accord with CS Policy CP1 and CP3 and MDD Policies CC03 and TB21.
- 5.45 **Transport and Parking:** Transport including connections to the surrounding area have been discussed at length elsewhere in this statement.
- 5.46 As noted, the proposed development utilises an existing access and it is anticipated that there will be not highway safety issues given no concerns were raised in relation to the access as part of the previous appeal.
- 5.47 Parking spaces are detailed on the attached plans and accord with the Council's parking standards. EV charging can be secured by condition in the event of a grant of planning permission.
- 5.48 For the reason above, the proposed development is considered to accord with
- 5.49 **Cycle Provision:** The proposal shows a potential location for a communal cycle storage. However, each unit will have its own private garden where occupiers can store cycles in their own unit. Cycle provision can be secured by way of condition.
- 5.50 **Refuse Provision:** A refuse store has been detailed on the supporting plans and has been positioned to accord with the relevant dragging distances for refuse vehicle operatives and prospective occupants.

- 5.51 It is important to note that the expectation is that the refuse lorry will reverse into the site to the bin store rather than to each individual unit as per the existing situation. Tracking drawings can be secured by condition in the event of a grant of planning permission.
- 5.52 **Drainage and SuDS:** The application site does not fall within a designated surface water flood zone. The current site is partly hardstanding and therefore non permeable. It is noted that a drainage management plan has previously been proposed via condition. This approach is considered acceptable should the Council consider this necessary.
- 5.53 The larger areas of soft landscaping should allow for soakaways of sufficient volume to be installed in this area should it be required. In conjunction with permeable paving and the reduction in hardstanding on the site, the Council should be able to condition any required details as the capacity to mitigate any run off has been demonstrated.
- 5.54 Furthermore, mobile homes typically feature water butts to capture any run off, as such there is no question that an acceptable drainage is able to be provided.
- 5.55 For the reasons detailed above, the proposed development is considered acceptable.
- 5.56 **Contamination:** The site is not known to be contaminated. If concerns are raised as part of this application, these can be controlled via condition in the event of a grant of planning permission.
- 5.57 **Ecology and Special Protection Area:** As per Policy CP3 of the Core Strategy, development proposals will be granted where they have no detrimental impact upon Ecology. CP7 follows to state that the degree of protection afforded to biodiversity designations will be appropriate to their status. In particular, development which may

harm Local Wildlife sites will only be permitted where it can be clearly demonstrated that the need for the proposed development outweighs the need to safeguard nature conservation.

- 5.58 The application is accompanied by an ecological impact assessment. This EIA details there to be no residual impacts on habitats on site and that the buildings to be demolished offer negligible suitability for roosting bats and there is to be no residual impacts on terrestrial mammals. No concerns were raised in relation to ecology as part of application ref. APP/X0360/W/24/3356397.
- 5.59 Since the determination of the previous application, mandatory Biodiversity Net Gain has come into force. As such, all applications are required to demonstrate 10% Biodiversity Net Gain.
- 5.60 A Biodiversity Net Gain Assessment by Darwin Ecology is also submitted in support of this application. This demonstrates an 11.29% net gain. The relevant measures to ensure this comes forward can be secured by condition in the event of a grant of planning permission.
- 5.61 The application site is within the Thames Basin Heath SPA 5Km zone. The Council and Natural England have produced an avoidance strategy to prevent disturbance to the SPA. Paragraph 3.8 of the strategy states that mobile or temporary dwellings may be required to contribute towards avoidance measures.
- 5.62 The applicant is willing to enter into a Section 106 Obligation to provide contributions to provide SANG contributions in order to not adversely affect the integrity of the SPA. It should be noted that in the first instance, the Applicant requests that the Council allocate their SANG as part of the proposal. However, in the event this is not agreed, the applicant retains an option agreement on a private SANG

via Cooper Estates which can be secured by condition in the event of a grant of planning permission.

- 5.63 **Affordable Housing:** Core Strategy policy CP5 requires proposals for 5 dwellings or more locate outside a development location to deliver 40% affordable housing. However, the policy does not extend to caravan site development and is therefore not applicable. Nevertheless, by their very nature, mobile home caravan development are more affordable units to purchase.
- 5.64 Furthermore, the revised NPPF has explicitly sought to address this by stating; *“Provision of Affordable housing should not be sought for residential developments that are not major developments”* in paragraph 65. The provision of Affordable housing should not be sought for residential developments that are not major developments. The framework defines major development, for housing, as development where 10 or more units will be provided.
- 5.65 In this case, the proposal would deliver 9 units. Therefore, the proposal would fall below the threshold.
- 5.66 **Community Infrastructure Levy:** The relevant forms are submitted alongside this application.

6. Conclusion

- 6.1 This statement has demonstrated that the proposed development is acceptable in principle and makes an efficient use of land.
- 6.2 Material planning considerations have been carefully considered and analysed, as evidenced in section 5 of this statement and the supporting plans and documents. It is considered the proposed development would contribute an appropriate windfall site to the Borough's housing supply, without adverse effect on the character of the area or the amenity of neighbouring residents.
- 6.3 Regardless of complying with relevant local and national policies, the benefits of the scheme are ubiquitous particularly in the context of the Council's lack supply of housing and a local ageing population.
- 6.4 The provision of age-restricted mobile homes will not only provide a contribution to this supply but also free up existing housing stock beyond the benefit of providing dwellings in the first instance.
- 6.5 Owing to its quantum and nature (mobile homes being brought to site) the benefits of the development would be able to be realised in quickly (not being required to be built out) whilst utilising previously developed land.
- 6.6 It is considered that the proposed scheme complies with relevant Development Plan Policies and is further supported by National Guidance. In addition to this, the proposed development is considered to overcome the concerns raised in application ref. Therefore, it is respectfully requested that planning permission is granted.

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