

GREY BELT STATEMENT

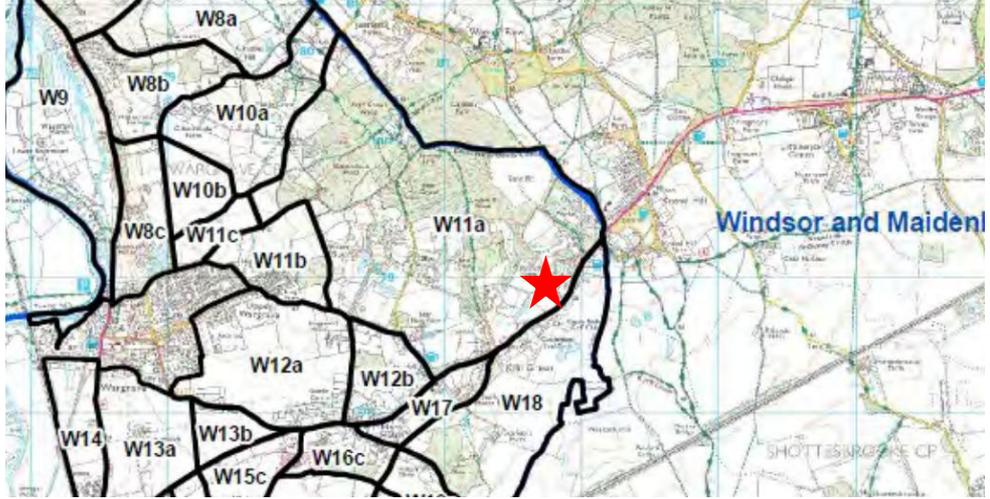
SITE ADDRESS Kiln Park, Bath Road, Knowl Hill

LOCAL AUTHORITY Wokingham Borough Council



*Figure 1: Site Location
NOT TO SCALE - INDICATIVE ONLY*

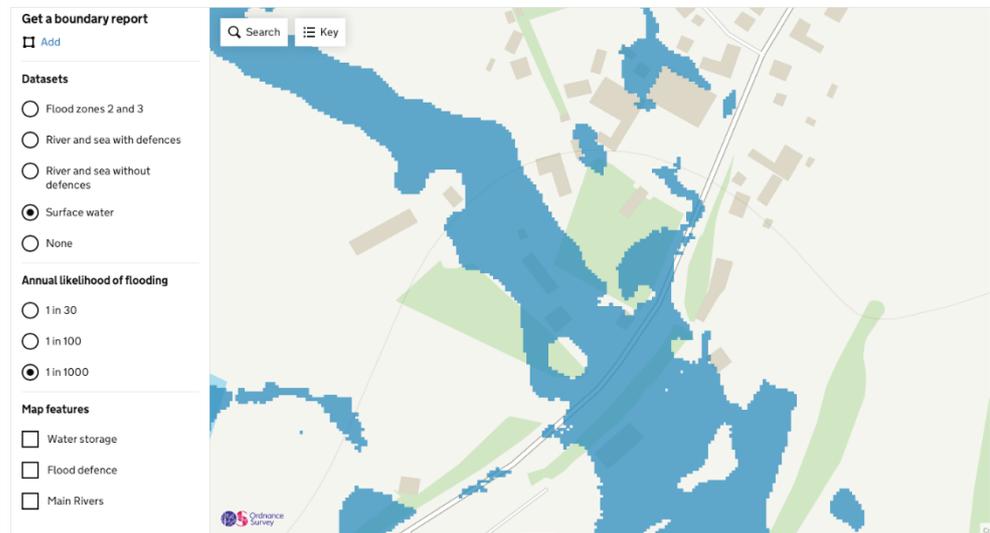
RELEVANT PLANNING DESIGNATIONS

<p>Green Belt</p>	<p>The Council’s Green Belt Review (June 2016) confirms that the Site falls within Parcel W11a (as shown by the extract below¹; red star denotes the approximate Site location).</p>  <p>Appendix C of the Council’s Green Belt Review (June 2016) includes a refined assessment of each parcel. Each parcel was scored against purposes a) (sprawl), b) (merging of towns), c) (countryside encroachment) and d) (historic towns) of the Green Belt (paragraph 143 of the NPPF) on whether the parcel makes ‘limited contribution’, ‘contribution’ or ‘significant contribution’ to a given purpose. Parcel W11a was deemed to make a ‘limited contribution’ to purpose a), b) and d) of the Green Belt. The parcel was deemed to contribute to purpose c) of the Green Belt.</p>
<p>Flood Zone</p>	<p>The Site has some risk of surface water flooding as shown by the Policies Map extract below.</p>

¹ Refer to the map on page 63 - Volume I of the Green Belt and Countryside Study (February 2013)



The EA Flood Map is also contained below. The Site is within Flood Zone 1, however the map shows a 1 in 1,000 annual likelihood of surface water flooding.



However, all proposed new built-development will be located outside of the surface water flood risk area and therefore no sequential test is required.

AONB / Natural Landscape	The Site is not located within or adjacent to a National Landscape.
Footnote 7 Assets	The Site is not located or affected by the assets listed in footnote 7 of the NPPF, relating to habitat sites (and those sites listed in paragraph 194) and/or designated as Sites of Special Scientific Interest; land designated as Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75); and areas at risk of flooding or coastal change.

HOUSING LAND SUPPLY

The Council have recently published a Five Year Housing Land Supply Statement confirming that they can only achieve a deliverable housing supply of 2.5 years against a 5-year requirement. This is based on the new Standard Method which was published alongside the new NPPF (December 2024, updated February 2025).

GREY BELT TEST

The new NPPF introduces the concept of ‘Grey Belt’ land, which *“For the purposes of plan-making and decision-making, ‘grey belt’ is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. ‘Grey belt’ excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development”*.

For the Site to be considered Grey Belt land, it must demonstrate that it does not *strongly* contribute to any of purposes (a), (b), or (d) and/ or is

previously developed land (PDL). This represents a lower threshold than that set out in the consultation draft NPPF which previously required the Site to have a *limited* contribution to *all five purposes* of the Green Belt.

As identified above, the Site falls within Parcel W11a which is deemed to make a 'limited contribution' to purposes (a), (b), and (d) of the Green Belt. The Grey Belt Review produced by The Richards Partnership concludes that the Site only makes a 'weak' contribution to these Green Belt purposes. In addition, the Site is considered to meet the definition of PDL as set out by the NPPF, as it comprises cottages, outbuildings, Nissen huts, access roads and associated hardstanding. It is therefore considered that the Site satisfies the NPPF definition of Grey Belt land.

IMPLICATIONS OF THE SITE BEING 'GREY BELT' ON THE GREEN BELT 'INAPPROPRIATE DEVELOPMENT' TEST

Context

The new NPPF, at paragraph 155, outlines criteria for identifying development that would not be considered inappropriate development in the Green Belt. The recently published PPG expands upon on this and provides further clarity in Figure 3 - Paragraph: 010 Reference ID: 64-010-20250225 (extract below), which confirms the additional conditions in which development would not be inappropriate in the Green Belt (including if the Site is found to be Grey Belt).

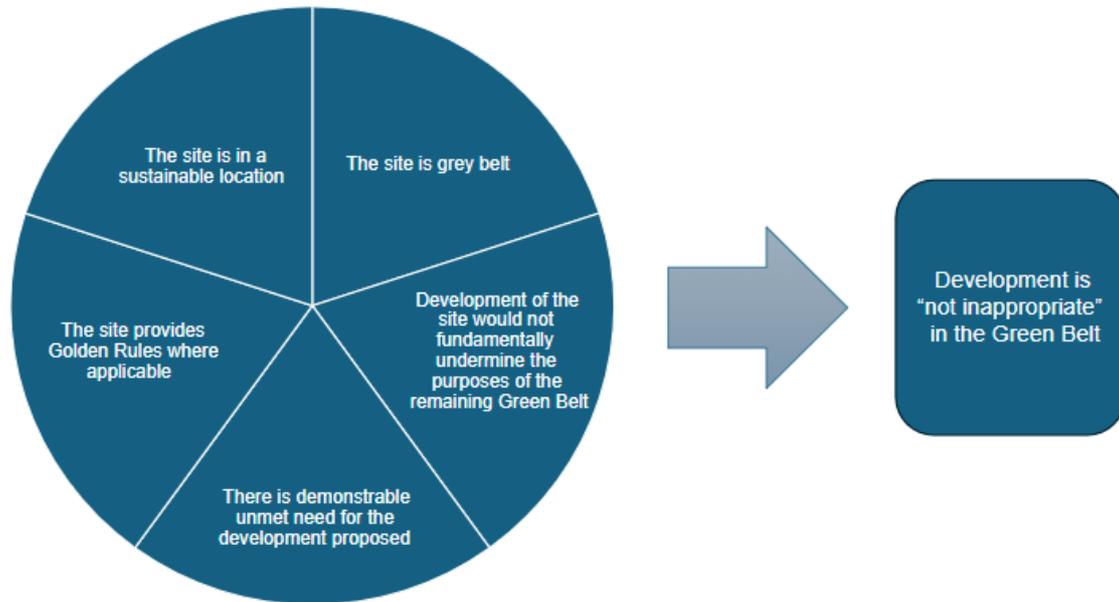


Figure 2 - Paragraph: 010 Reference ID: 64-010-20250225

The NPPF introduces subtle changes, regarding the consideration of inappropriate development. These changes, along with clarifications provided in the PPG, are assessed and summarised below. However, the overall conclusion remains that the Proposed Development would not represent inappropriate development in the Green Belt.

Paragraph 155 – ‘Not’ Inappropriate Development in the Green Belt

The list below sets out the conditions, under paragraph 155 of the NPPF, for which development is not deemed inappropriate in the Green Belt. We have provided justification against each condition to demonstrate that the Site is not deemed inappropriate in the Green Belt.

- **“Development would utilise grey belt land”** – As set out above and within the Grey Belt Review undertaken by The Richards Partnership, we consider the Site would meet the definition of Grey Belt land.

- **"There is a demonstrable unmet need for the type of development proposed"** – The Council can no longer demonstrate a five-year housing land supply (as set out above and within the Planning Statement for this application).
- **"The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework"** – Motion have undertaken a Locational Sustainability appraisal to support this application. The appraisal concludes that whilst the Site is outside a defined settlement boundary, there is a range of local service and amenities within walking distance of the site. The Site is also well served by public transport, which enables a wide range of services within Twyford, Maidenhead and Reading to be reached by sustainable modes of transport. In addition, existing residential development along the Bath Road (A4) would however set a precedent for the potential of the Site being a sustainable development location. The closest bus stop is located approx. 150m to the north of the Site and the closest convenience store approx. 200m away. The Locational Sustainability appraisal concludes that, in accordance with paragraphs 110 and 115 of the NPPF, the Site is within a sustainable location.
- **"Where applicable the development proposed meets the 'Golden Rules' requirements set out in paragraphs 156-157"** – The Golden Rules is only relevant to major development (i.e. development of 10 or more dwellings) and therefore is not relevant to this PiP application.
- **"Development of the site would not fundamentally undermine the purposes of the remaining Green Belt"** – The PPG² clarifies that authorities must consider whether releasing land from the Green Belt would meaningfully impact the overall purposes of the Green Belt

² Paragraph: 008 Reference ID: 64-008-20250225

across the wider area of the plan. The Green Belt Review undertaken by The Richards Partnership concludes that, given the Site comprises only a small portion of Parcel W11a, development of the Site would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the plan area as whole.

CONCLUSION

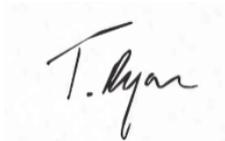
In conclusion, the Site would meet the definition of Grey Belt land and would not result in inappropriate development in the Green Belt. The parts of the Site which comprise cottages, outbuildings, Nissen huts, access roads and associated hardstanding, is also considered to fall within the definition of PDL. Notwithstanding this, the Site makes a limited contribution to the relevant purposes of the Green Belt and therefore would pass the Grey Belt tests.

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