

Land at Woodlands Farm, Kiln Green

Cooks Hill Cottage Green Belt Review



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Introduction

Objective

This document has been prepared in support of a permission in principle application for the erection of up to 5 dwellings to replace Cooks Hill Cottage and the existing Nissen Huts, on land at Woodlands Farm, Kiln Green, Wokingham.

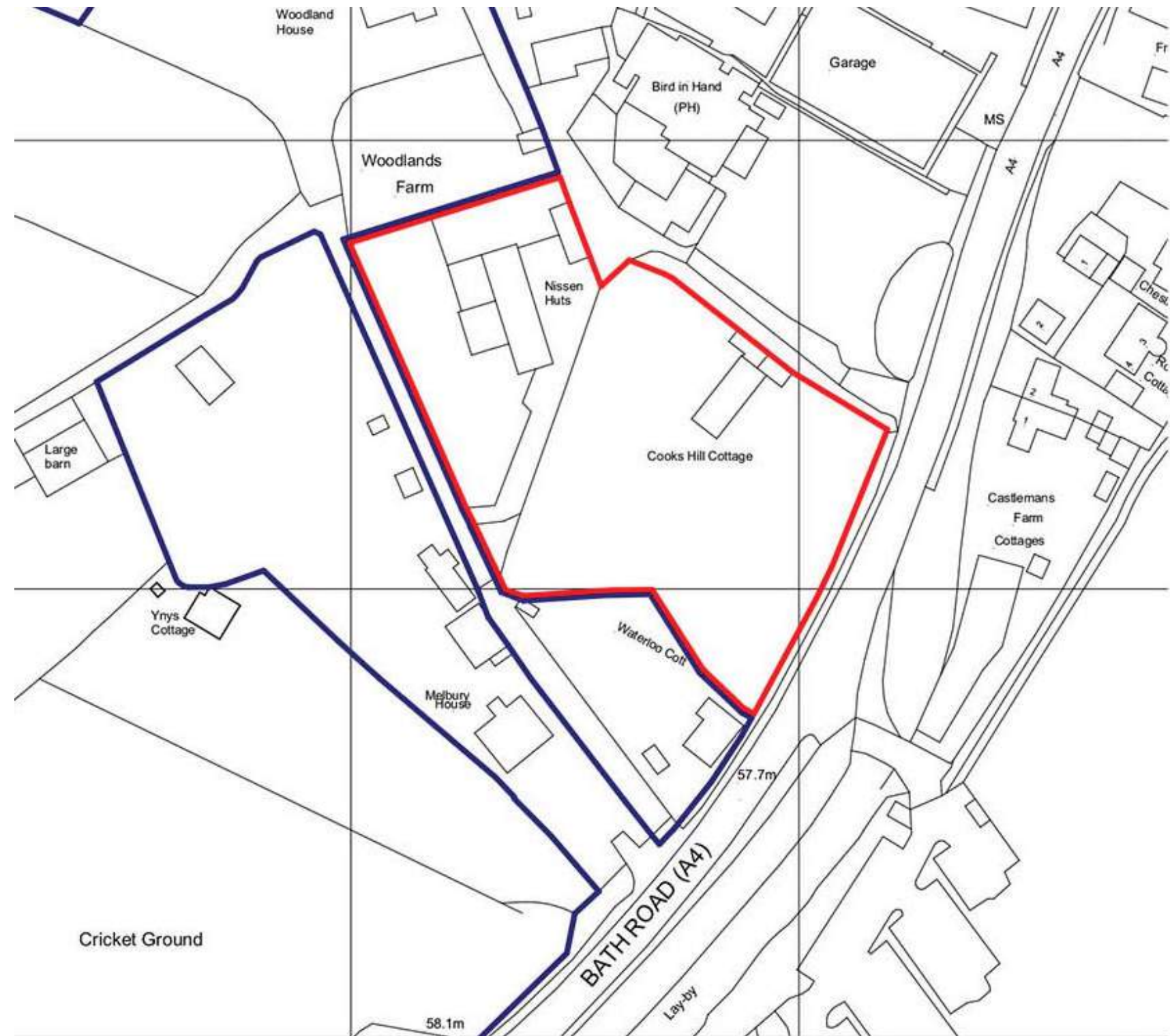
The Richards Partnership has been commissioned to undertake a review of the site's Green Belt credentials against the recently updated NPPF (December 2024) and government guidance on Green Belt "Advice on the role of the Green Belt in the planning system" (updated 27th February 2025).

In light of the changes to the protection and consideration of Green Belt, this assessment considers:

1. If the site is Grey Belt
2. If the introduction of development on the site would fundamentally undermine the purpose of the remaining Green Belt.

Site Location

The site is located in the small village of Kiln Green, off the A4 (Bath Road), approximately 4.5km to the west of Maidenhead and 6.5km to the east of Reading. The site is sandwiched between The Bird in Hand pub to the north-east, Waterloo Cottage and Melbury House to the south and west, and Woodlands Farm House to the north. The south-eastern boundary is defined by Bath Road.



Location Plan

Site Location



Wokingham Green Belt Evidence Base

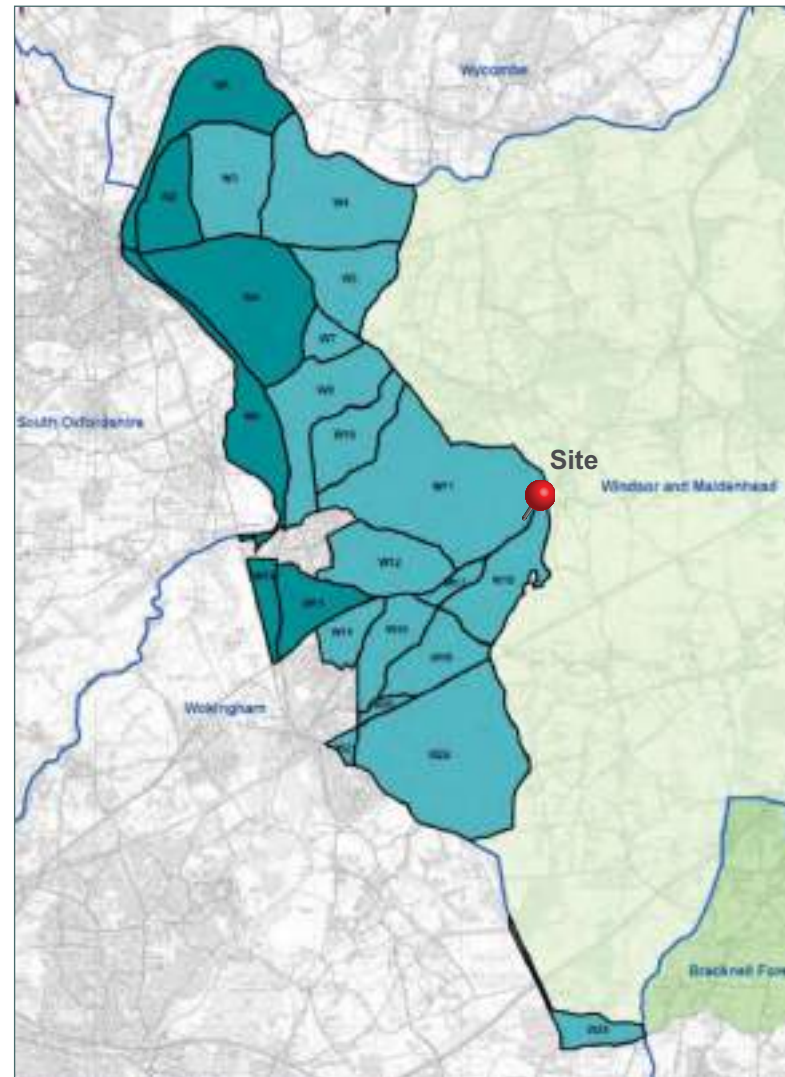
Wokingham 2016 Green Belt Review

The site is located within the jurisdiction of Wokingham Borough Council. A combined Bracknell Forest and Wokingham Borough Council Green Belt review was undertaken in 2016 and forms part of Wokingham Borough Council's current evidence base. The objective of the 2016 review was:

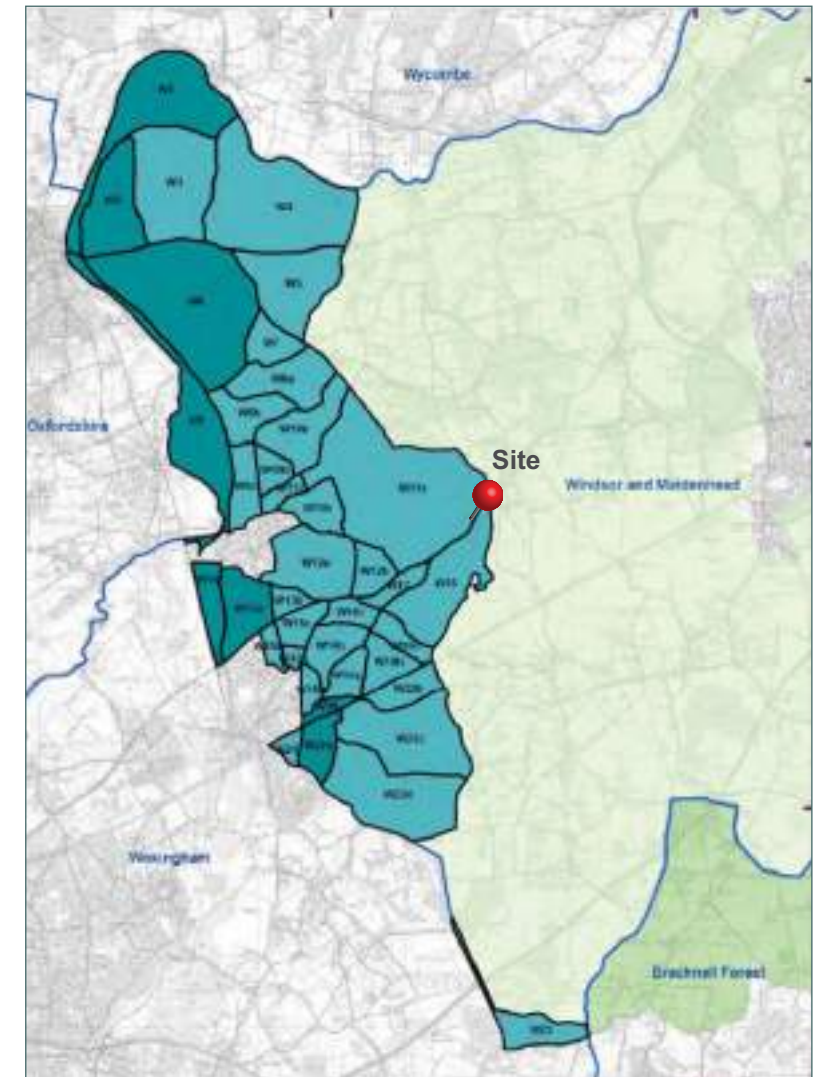
"to test the Green Belt against the five purposes set for it in national policy to determine the extent to which it is contributing to those purposes."

The review included a strategic review, considering the role of the Green Belt as part of the wider Metropolitan Green Belt and a refined review of the Green Belt, considering the role of smaller parcels.

The assessment scores parcels for their cumulative contribution to the Green Belt, when assessed against the individual Green Belt purposes. Scores range from **'Limited Contribution'**, to **'Contribution'** and **'Significant Contribution'**.



Overall Strategic Contribution to the Green Belt
(Extract from Wokingham 2016 Green Belt Review, Figure 5)



Refined Review of the Overall Contribution to the Green Belt
(Extract from Wokingham 2016 Green Belt Review, Figure 7)



Wokingham Green Belt Strategic Parcel W11
(Extract from Wokingham 2016 Green Belt Review, Appendix C)

The site sits within Strategic Parcel W11 and Refined Parcel W11a. The review scored Parcels W11 and W11a as making a **‘Contribution’**.

The 2016 review, assesses the refined parcels against purposes A-D of the Green Belt and scores parcel W11a as follows:

Green Belt Purpose	Score
A: To check the unrestricted sprawl of large built-up areas	Limited Contribution
B: To prevent neighbouring towns merging into one another	Limited Contribution
C: To assist in safeguarding the countryside	Contribution
D: To preserve the setting and special character of historic towns	Limited Contribution
Overall Contribution to Green Belt Purposes	Contribution



Wokingham Green Belt Refined Parcel W11a
(Extract from Wokingham 2016 Green Belt Review, Appendix C)

The overall score for Parcel W11a is elevated from **‘Limited Contribution’**, to **‘Contribution’**, due to its role in purpose **C**.

Since the 2016 review was prepared, the NPPF has been revised and has introduced the notion of Grey Belt (discussed in further detail on page 12). Supporting guidance on Green Belt, states that Green Belt should be assessed to identify Grey Belt and that assessments should include an evaluation of the contribution an assessment area makes to Green Belt purposes (a), (b), and (d). It is therefore considered that had the 2016 Green Belt review been assessed against current government guidance, Parcel W11a would have scored an overall score of **‘Limited Contribution’** to the Green Belt as purpose C would not be included.

Existing Site Conditions

Site Description

The site measures approximately 0.72 Ha and comprises a cottage (Cooks Hill Cottage), associated driveway and outbuildings, two large Nissen huts and associated hard standing.

The site is accessible via a private shared drive off Bath Road, which also serves Woodlands Farm House. The site has its own dedicated access point off Bath Road in the south-eastern corner, albeit this has become overgrown and is not currently in use.

The site is physically and visually very well contained by its boundary and internal tree planting, albeit, it is acknowledged that the site survey was undertaken in July, when deciduous species are in full leaf and would have less of a screening effect in winter.

The site's northern boundary is defined by a belt of mature beech trees which preclude any views to the north, save for filtered views to the adjoining Woodlands Farm House beneath the tree canopy.

The eastern boundary comprises a thick belt of tree and understorey/ hedgerow vegetation, which provides a dense screen along the northern part of this boundary, but thins out and opens up towards the southern half, revealing filtered views into the site from the adjoining Bird in Hand car park.

The southern boundary is defined by a chain link fence, along which a line of mixed scrub/hedgerow species and budleja has developed. This provides intermittent screening of the site when viewed from Bath Road. Bath Road is a busy transport corridor and has an aural impact on the site

The southern half of the site's western boundary is formed by a circa 2m high close board fence which surrounds the adjoining Waterloo Cottage. This transitions to a temporary timber frame and net fence of the same height along the northern part of the western boundary.

The site is interspersed with a mix of mature large stature trees including ash, beech, oak, eucalyptus and leylandii. These in conjunction with the site's boundary tree planting and tree planting within the immediate surroundings combine to give the site an intimate, enclosed feel. Where outward views from the site are available, these extend only as far as the site's immediate surroundings.

The site is broadly flat, with a gentle slope towards the southern boundary, falling from +59.16m AOD in the north-eastern corner, down to +57.44m AOD in the south-western corner, with the exception of what appear to be some man-made mounds circa 2m high located in the centre of the site, which are consumed by bramble.

A drainage ditch has been formed adjacent to the Waterloo Cottage boundary, which connects to a head wall in the verge alongside Bath Road.

Defining Previously Developed Land

NPPF Annex 2 Glossary defines Previously Developed Land (PDL) as follows:

“Land which has been lawfully developed and is or was occupied by a permanent structure and any fixed surface infrastructure associated with it, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed). It also includes land comprising large areas of fixed surface infrastructure such as large areas of hardstanding which have been lawfully developed. Previously developed land excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.”

The site has become overgrown with bramble and ivy in places, albeit Cooks Hill Cottage remains standing and visible from Bath Road and the adjoining Bird in Hand car park. The Nissen huts are largely intact and in a reasonable state of repair and whilst there is some encroachment of vegetation, the associated hard standings remain visible.

It is unclear whether the Nissen huts form part of the curtilage of Cooks Hill Cottage. OS data and historic maps suggest there may have historically been two separate plots, albeit there is currently no physical boundary separating the huts from the cottage, which suggests the site as a whole could be considered the curtilage of Cooks Hill Cottage.

Built form on the site is not considered to have ‘blended into the landscape’ and Cooks Hill Cottage and its associated curtilage is therefore considered to be PDL.



Cooks Hill Cottage

In considering the release of Green Belt land for development NPPF Paragraph 148 states:

“Where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations.”

Photo Locations Plan





1. View from south-eastern boundary looking west across the site



2. View from centre of the site looking towards Cooks Hill Cottage and north-eastern boundary



3. View from south-eastern boundary looking south-west across the site

Existing Site Conditions



4. View from Nissen hut hard standing looking towards the site's western boundary



5. View from north of the site looking towards the site's northern boundary



6. View from north boundary looking south-east across the site



7. View from A4 (Bath Road) Lay-by looking north towards the site's southern boundary



8. View from A4 (Bath Road) Lay-by looking north-west towards the site's southern boundary



9. View from the Bird in Hand pub car park looking south west towards the site.

Grey Belt Assessment

The Introduction of Grey Belt

The role and approach to the assessment of Green Belt has significantly changed since the release of the revised NPPF December 2024. The NPPF sets out the Government’s planning policies and how these should be applied. Sustainable development remains a ‘golden thread’ running through the NPPF in both plan-making and decision-taking. Paragraphs 142 to 160 are dedicated to defining the role the Green Belt has in creating sustainable development.

Paragraph 143 defines the five purposes for the creation and retention of Green Belt land:

- a) to check the unrestricted sprawl of large built-up areas;
- b) to prevent neighbouring towns merging into one another;
- c) to assist in safeguarding the countryside from encroachment;
- d) to preserve the setting and special character of historic towns; and
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The December 2024 NNPF introduced into UK planning policy the matter of “Grey Belt”. Grey Belt is defined in the supporting Annex as,

Grey belt: 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.

Contribution of Land to Green Belt

The February 2025 Green Belt Guidance provides guidance on how the contribution land makes to a Green Belt should be assessed. This assessment is based on Purposes a), b) and d). Purposes c) Encroachment and e) Urban Regeneration are excluded from the assessment of Grey Belt.

With regards the three Purposes to be considered in any assessment, the guidance provides a table listing characteristics that are considered to provide; **‘Strong’**, **‘Moderate’** and **‘Weak/None’** levels of contribution.

The following table considers the contribution the site makes to purposes a, b & d using the criteria, thresholds and terminology provided in the February 2025 guidance.

Purposes	“Illustrative Features” noted in the PPG	Assessment of the Site	Contribution
Purpose A - to check the unrestricted sprawl of large built-up areas	1. The extent of existing development: 2. Physical features in reasonable proximity that could restrict development: 3. Proximity to large built up area: 4. Would development be an incongruous pattern of development (such as an extended “finger” of development:	The site is not adjacent to or near to a large built up area. The nearest large built up areas are Maidenhead, approximately 4.5km to the east and Reading, approximately 6.5km to the west. There is existing development on the site in the form of Cooks Hill Cottage, associated outbuildings, access drive, large Nissen huts and associated hard standing. The site is contained by physical features that would restrict and contain development such as Bath Road to the south, the Bird in Hand Pub to the east, Waterloo Cottage and Mulberry House to the west and Woodlands Farm House to the north. Development would not result in an incongruous pattern given the site’s position relative to the surrounding existing dwellings described above.	Weak or None
Purpose B - to prevent neighbouring towns merging into one another	1. Physical Contribution to a gap between towns: 2. Visual Contribution to a gap between towns:	As described above, the site is located approximately mid-way between a circa 11km gap between the nearest Towns of Mainehad and Reading. The site measures circa 75m wide. The site is not free from development. The site does not make a visual contribution to the separation of towns.	Weak or None
Purpose D - to preserve the setting and special character of historic towns	1. Form part of the setting of the historic town: 2. Contribution to the special character of a historic town: 3. Containing existing development:	The site does not form part of the Historic setting of a town.	Weak or None
SUMMARY:	It is considered that the site does not strongly contribute to any of Purposes A, B or D		

Application of Footnote 7

The Green Belt February 2025 Guidance states:

“After consideration of the above criteria, any assessment area that is not judged to strongly contribute to any one of purposes a, b, or d can be identified as grey belt land, subject to the exclusion of land where the application of the policies relating to the areas or assets in footnote 7 to the NPPF (other than Green Belt) would provide a strong reason for refusing or restricting development.”

Footnote 7:

“The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 194) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, 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.”

The site is not subject to any of the above designations, nor is the site located within Flood Zone 2 or 3.

Parts of the site are identified as being at risk of surface water flooding by the Environment Agency. However, we are advised the layout will be designed to ensure that no development would be located within the area identified as being at risk of surface water flooding.

It is therefore considered that the application of policies relating to footnote 7 do not give rise to a strong reason for refusing or restricting development and that **the site is judged to be Grey Belt**.

Grey Belt Assessment

Impact on the Remaining Green Belt in the Plan Area

In reference to the NPPF Paragraph 155, the Green Belt Guidance (February 2025) notes:

“A Green Belt assessment should also consider the extent to which release or development of Green Belt land (including but not limited to grey belt land) would fundamentally undermine the purposes (taken together) of the remaining Green Belt across the plan area as whole.

In reaching this judgement, authorities should consider whether, or the extent to which, the release or development of Green Belt Land would affect the ability of all the remaining Green Belt across the area of the plan from serving all five of the Green Belt purposes in a meaningful way.”

Accordingly, the following table considers to what extent the release of the site from the Green Belt would affect the ability of the remaining Green Belt to perform all five Green Belt Purposes.

Purposes	Assessment of the site in relation to the remaining Green Belt	Affect on remaining Green Belt
Purpose A - to check the unrestricted sprawl of large built-up areas	Proximity to large built up area: The site is not adjacent to or near to a large built up area. There would be a significant area of remaining green belt to the west of the site which would be capable of serving this purpose The extent of existing development: There is existing development on the site, whereas the remaining Green Belt contains large areas of open, undeveloped land which is better suited to meeting this Green Belt Purpose Physical Features in reasonable proximity that could restrict and contain development: The site is well contained by physical features including surrounding built form and the A4, Bath Road, which would safeguard the remaining Green Belt from sprawl emanating from this site Would development be an incongruous pattern of development: Development of the site would not result in an incongruous pattern given the site’s position relative to the surrounding existing dwellings described above and the remaining Green Belt would safeguard against incongruous development pattern from occurring.	Weak or None
Purpose B - to prevent neighbouring towns merging into one another	Contribution to a gap between towns: The site measures circa 75m wide and represents a negligible proportion of the circa 11km gap between Maidenhead and Reading. The remaining Green Belt would continue to perform this function. The site is not free from development. Contribution to visual separation of towns: The site does not make a visual contribution to the separation of towns.	Weak or None
Purpose C - to assist in safeguarding the countryside from encroachment	Quantum of Previously Developed Land: The site comprises a cottage, associated access drive and hard standings and large Nissen hits with associated hard standings. It is therefore considered to be PDL as defined in the December 2024 NPPF Annex 2 Glossary. There are significant tracts of undeveloped open countryside in the remaining Green Belt. Urban context/influences: The site is bounded by built form on three sides (including residential dwellings and the Bird in Hand Pub) and the busy A4 (Bath Road) to the south, which has an aural influence on the site. Visual contribution/sense of openness: The site is physically and visually well contained by surrounding built form and tree planting within and around the immediate vicinity of the site. It is not considered that the site plays a meaningful contribution to the openness of the Green Belt, nor would the release of it have a meaningful effect on the openness of the remaining Green Belt.	Weak or None
Purpose D - to preserve the setting and special character of historic towns	The site does not form part of the Historic setting of a town.	Weak or None
Purpose E - to assist in urban regeneration, by encouraging the recycling of derelict and other urban land	As described above site is considered to be PDL. Furthermore it is not anticipated that development on this site would preclude development of other brownfield sites elsewhere in the Borough.	Weak or None
SUMMARY:	The site represents a diminutive proportion of the wider Wokingham Green Belt. The site is considered to perform a weak to no role in all five purposes of the Green Belt and the release of the site from the Green Belt is considered to have little to no effect on the ability of all five Green Belt purposes to be maintained in the remaining Wokingham Green Belt.	

Summary

This document has been prepared in support of a permission in principle application for the erection of up to 5 dwellings to replace Cooks Hill Cottage and the existing Nissen Huts, on land at Woodlands Farm, Kiln Green, Wokingham.

The Richards Partnership has been commissioned to undertake a review of the site’s Green Belt credentials against the recently updated NPPF (December 2024) and government guidance on Green Belt “Advice on the role of the Green Belt in the planning system” (updated 27th February 2025).

In light of the changes to the protection and consideration of Green Belt, this assessment considers:

- 1. If the site is Grey Belt
- 2. If the introduction of development on the site would fundamentally undermine the purpose of the remaining Green Belt.

The site sits within refined parcel W11a of the Wokingham 2016 Green Belt Review. Parcel W11a was found to make a ‘**Contribution**’ to the Green Belt in the 2016 review. When assessed against current government Green Belt review guidance this would be downgraded to ‘**Limited Contribution**’.

The site which comprises a disused cottage, access drive, outbuildings and two large Nissen huts with associated hard standing, is considered to constitute Previously Developed Land.

In considering the release of Green Belt land for development NPPF Paragraph 148 states:

“Where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations.”

The site was assessed against current government Green Belt guidance and found to make a **weak to no** contribution to purposes a,b and d of the Green Belt.

In accordance with current guidance, consideration was given as to how release of the site from the Green Belt would affect the ability of the remaining Green Belt to perform against all five Green Belt purposes.

The site represents a diminutive proportion of the wider Wokingham Green Belt and it was found that release of the site from Green Belt would have a **weak to no** effect on the ability of the remaining Wokingham Green Belt to perform against all five Green Belt purposes.

This assessment concludes that **the site is judged to be Grey Belt.**

