



Head of Development Control
Planning Department
Wokingham Borough Council

10.04.26

(by email only)

AM2P Ref: J.163
LPA Ref : 260791

Dear Sir/Madam,

Re: Application 260791 – Penguin, Wargrave Rd, Remenham

I write on behalf of Remenham Parish Council in order to object to the above planning application relating to a proposed replacement dwelling and outbuilding. The fundamental area of concern is that the replacement dwelling would clearly be materially larger than the one it will replace and is therefore in conflict with development plan policy and national policy as a result. There are no very special circumstances to justify such a conflict.

It is noted that at no point in either the Applicant's Design & Access Statement or Planning Statement is any reference made to the size of the existing dwelling on site. This is of fundamental importance to any assessment of the current planning application, yet the Applicant has chosen to make no reference to it, instead choosing to make reference to a much larger figure which includes extensions and outbuildings that are not built, as the 'base figure' against which all comparisons should be made. Such an approach is incorrect, as will be explained below.

The proposed replacement dwelling needs to be assessed against relevant development plan policy. In this case, given the site's Green Belt location, Core Strategy policy CP12 is the most relevant.

Policy CP12 advises that permission will not be granted for inappropriate development in the Green Belt, as defined in PPG2. Since the adoption of the Core Strategy PPG2 has been replaced by the NPPF (Dec 24), which now sets out relevant guidance on inappropriate development in the Green Belt.

The NPPF provides clear guidance on the approach towards replacement buildings at paragraph 154 (d) advising that such development will be inappropriate if the new building is not in the same use or is materially larger than the one it replaces (my underlining). It is very strongly considered that the proposed replacement dwelling in this case will be materially larger than the one it replaces, as explained below. Even if taken as a whole, the proposed replacement 'buildings' will be materially larger than the 'buildings' they replace.

The existing dwelling, as shown on the submitted plans, has an internal floorspace of 124 sq m, with the garage a further 34 sq m and the further two existing outbuildings an

additional 29 sq m. So, an individual existing dwelling of 124 sq m and combined existing buildings of 187 sq m.

The proposed dwelling will have an internal floorspace of 250 sqm – double that of the existing. The proposed outbuilding will have an internal floorspace of 94 sq m. So when combined, the total proposed buildings will have an internal floorspace of 344 sq m (compared to 187 sq m of those they will replace), an 84% increase.

Volume comparisons are even more extreme. The existing dwelling has a volume of 385 cu m that will be increased to 1,035 cu m for the proposed dwelling – a 269% increase! And if the outbuildings are combined with the dwelling, the increase from existing volume (580 cu m) to the proposed volume (1,350 cu m) is a 233% increase.

Whilst there is no precise guidance with regards the proportionate increase that should be classed as materially larger, it is indisputable that proposals which at least double the size of existing buildings, as is the case in this instance, have to be viewed as materially larger. Whilst debate may be had over whether increases of 30%, 35% or 40% should be classed as materially larger in specific circumstances, there is no such debate when the increases are in the realms of 200%!

The Council's MDD Local Plan advises in supporting text to Policy TB01 (Development in the Green Belt), that alterations or extensions to dwellings in the Green Belt should be limited, and that generally this requires less than a 35% increase from the original. Whilst recognising Policy TB01 is not specific to replacement dwellings it provides further indication of the scale of increase typically considered appropriate in the Green Belt.

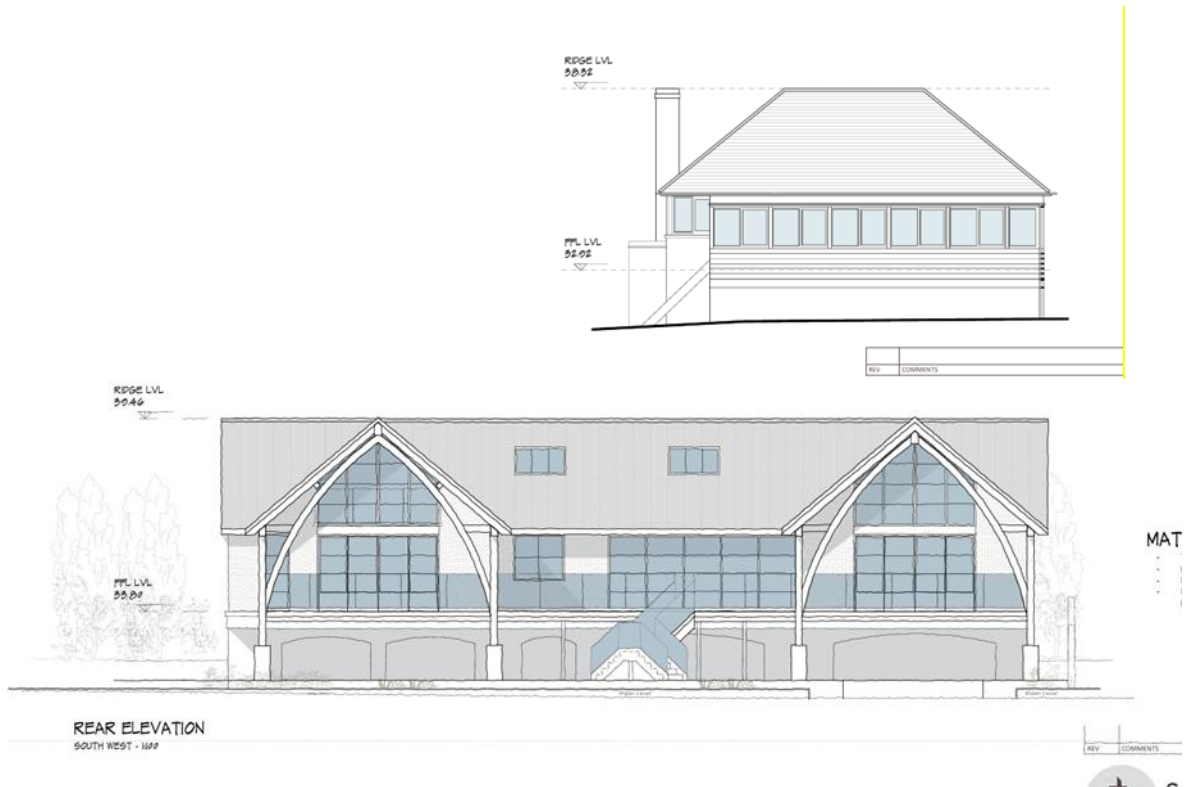
The proposal definitely represents a materially larger scheme than that which it replaces and should clearly be classed as inappropriate development in accordance with paragraph 154 (d) of the NPPF. As a result, the proposal is in clear conflict with Policy CP12.

Policy CP11, which relates to all land outside of settlements, advises that replacement dwellings must either bring about environmental improvements or not result in inappropriate increases in the scale, form or footprint of the original building (my underlining).

With regards the latter point, the above assessment has explained very clearly why the scheme will represent an inappropriate increase by more than doubling the size of existing development on site, let alone the original. With regards to whether the scheme will bring environmental improvements, this is a rather vague requirement. The Applicant gives no detail with regards to biodiversity gain, commenting that there is no need to achieve a 10% increase due to the self-build nature of the project. What is clear is that the resulting building(s) will be much larger, cover a greater area, and introduce a more prominent development to the site, which will be very apparent from public viewpoints. The impact upon the environment is therefore considered to be a negative one, and the proposal conflicts with Policy CP11 accordingly.

The above concerns relating to the adverse impact of the building are highlighted with a simple comparison of how the site will look if the development is introduced, compared to how it is now. The Applicant has chosen not to provide an existing and proposed comparison in the submitted drawings. The below extracts show the existing and proposed rear elevations – ie the elevation that will be very apparent from the public viewpoints of the Thames and opposite side of the river.

Existing Rear Elevation v Proposed



Such a comparison highlights the vast difference between what is existing and what is proposed, and this is the assessment that Policy CP12 requires.

Even when comparing the Applicant's own street and river elevations – which include all the PD schemes that have not been built, the increase in the scale of development and coverage of the site is very apparent. The openness of the site will clearly be harmed, this being one of the purposes of the Green Belt, whether compared to the real existing situation, or that suggested by the Applicants to include the PD schemes.

When advising on replacement dwellings, the Council's own Design Guide comments on page 103 that any increase in footprint of a replacement dwelling in the Green Belt is likely to have an impact upon its openness. In this instance, the proposed footprint of the replacement dwelling will double that of the existing. There will very clearly be a substantial impact upon openness.

The Applicant's case is founded on their suggestion that complete allowance needs to be given to the approved PD schemes on site. It is correct that some consideration can be given to the developments approved under PD. But such consideration should not impact upon how the proposal is viewed against adherence of the above policies, because the above policies clearly require comparison with either the 'original' building on site, or that to be replaced – ie the existing.

The question is how much weight should be given to the PD schemes, and whether this in turn results in a very special circumstance to justify inappropriate development in the Green Belt and a material consideration strong enough to reach a decision that is not consistent with the development plan. For the reasons set out below, it is strongly considered that very limited weight should be given to the PD schemes in this instance.

The Applicant's Planning Statement includes reference to an Appeal decision at Shepperton, in which an Appeal Inspector gave some allowance to approved but unbuilt extensions, when assessing a replacement dwelling in the Green Belt – meaning that a scheme which represented a 63% increase beyond the existing was allowed. The Applicant suggests that the Council should therefore apply the same approach in this instance. This is strongly disputed for a number of reasons, as explained below.

- The Shepperton appeal relates to a scheme that proposes a 63% increase in floorspace beyond the existing. The proposal at Penguin proposes at least a 200% increase. They are not similar scales of increase.
- The Shepperton Inspector comments at paragraph 14 of their decision that there is '*a strong likelihood that the remaining extensions would proceed if the appeal is unsuccessful*'. The proposal at Penguin has included outbuilding PD schemes in addition to extensions. Efforts have clearly been made historically to 'max out' the PD potential of the site. There is no strong likelihood of these buildings being erected if the application (or future appeal) is not allowed.
- The principle of incorporating PD outbuildings that are not in place as part of a fallback position for a replacement dwelling is clearly flawed. Many properties in the Green Belt have substantial garden areas, which would permit very large outbuildings under PD rights to be erected. To suggest that such 'potential' outbuildings should be relied upon to justify increases to a dwelling or replacement dwelling in the Green Belt would lead to extensions or replacement dwellings that are significantly and materially larger than the existing – which is completely against the underlying intention of Green Belt policy.
- A fallback position also only carries significant weight if it is more harmful than the scheme that is proposed (see Appeal Decision 3337078 attached). In this instance, the Applicant's own comparative elevations show that the proposed replacement dwelling and outbuilding will have a notably more harmful impact upon the openness of the site than the PD inclusive scheme.

It is understood why the Applicant has felt the need to rely upon the unbuilt PD schemes to try and make their case, but for the reasons set out above, they are wrong to do so.

To conclude, the application is in clear conflict with relevant development plan policies, and should therefore be refused unless material considerations indicate otherwise. In this case, material considerations in the form of the NPPF and the Council's Design Guide have shown why the proposal represents inappropriate development in the Green Belt. It would not preserve, and would have a harmful impact upon the openness of the Green Belt. This letter has explained why there are no very special circumstances in this case to justify inappropriate development in this instance. It therefore follows that the application should be refused planning permission.

Yours sincerely,



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