

**PLANNING, COMMUNITY
INVOLVEMENT & AFFORDABLE
HOUSING STATEMENT**

**PLANNING APPLICATION FOR THE
ERECTION OF 19 DWELLINGS,
ASSOCIATED PARKING, LANDSCAPING
AND ACCESS AND DEMOLITION OF
EXISTING BUILDINGS**

**LADDS GARDEN CENTRE
BATH ROAD
HARE HATCH
READING
RG10 9SB**

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for

Westbourne Homes Ltd.

WBP REF: 8539

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ANNEXES

- A. Officer Report relating to approved application LPA Ref. 203085
- B. Review of Green Belt appeal decisions concerning NPPF paragraph 154(g)

1. INTRODUCTION

- 1.1. This Statement has been prepared by Woolf Bond Planning in support of a planning application for 19 dwellings, associated parking and landscaping and demolition comprising the residential redevelopment of the Ladds Garden Centre, Bath Road, Hare Hatch, Reading, RG10 9SB.
- 1.2. Access is proposed from Bath Road reflecting the location and form of the existing bell mouth junction serving the existing use. The proposed scheme will be served with a new service road. Further details are set out within the supporting Transport Statement.
- 1.3. A comprehensive suite of technical work has been undertaken, with the following reports underpinning and informing this submission:
 - Completed Application Form
 - Site Location Plan
 - Existing Plans
 - Architectural drawings
 - Design and Access Statement
 - Community Involvement (included within this statement)
 - Affordable Housing Statement (included within this statement)
 - Archaeology & Heritage Statement
 - BNG Report, Metric & Enhancement Plan
 - Ecological Impact Assessment
 - Energy Strategy
 - Flood Risk Assessment and Drainage Strategy
 - Transport Statement & Site Access Drawing
 - Landscape & Visual Impact Assessment
 - Landscape drawings
 - Transport Statement (inc. Parking Management Plan)
 - Tree Report, TPP, TCP, AIA
 - Viability Assessment.
- 1.4. The scheme includes a complete set of documents that are entirely proportionate for validation purposes. The proposed scheme (and its supporting information) is therefore wholly consistent with NPPF paragraph 45

that requires Local Planning Authorities to request supporting information that is relevant, necessary and material to support this application.

- 1.5. The site, surroundings and its context are summarised in Section 2. Section 3 describes the application proposals. Section 4 sets out the relevant planning policy and material considerations. A planning assessment of the proposal is then undertaken in Sections 5 to 7.
- 1.6. This application is submitted in support of the redevelopment of a previously developed site consistent with the guidance in paragraph 154 (g) of the updated National Planning Policy Framework (NPPF) published on 12th December 2024. The updated NPPF also amends how the Council are to assess their housing requirement. Given that the Council accepts that it cannot demonstrate a 5 year supply of housing land, this is a further significant factor in support on the application. Furthermore, the site is considered a suitable location for housing development and an appropriate development opportunity in this Green Belt location.

2. SITE DESCRIPTION & PLANNING HISTORY

Site Description

- 2.1. The application site falls within the Parish of Wargrave, within Wokingham Borough where there are a cluster of garden centres, of which Ladds is one.
- 2.2. The site is a garden village, together with the operation of a number of concession businesses. The planning history confirms that the site comprises previously developed land, including buildings and hardstanding alongside other structures.
- 2.3. The site has some established hedgerow planting around its boundaries. To the south is Scarletts Lane, a cul-de-sac of residential development with predominantly detached houses, and bungalows at the northern end.
- 2.4. To the west is the elongated property of The Bird Gardens, a residential dwelling with a substantial garden that was allowed at appeal in 2023 as a redevelopment of former animal enclosures and an aviary. The approved dwelling was completed between April 2023 and March 2024, as indicated in the Council's land supply assessment. To the south are dwellings and further commercial uses. To the east is the plant nursery of Mulberry Plants with small field parcels clearly demarcated by established trees and hedgerows. To the north of Bath Road is Hare Hatch House, with extensive lawns with sporadic trees enclosed by trees and hedgerows forming its grounds.
- 2.5. A satellite view of the site (NB: the red line boundary is approximate) is provided over the page.



Fig 2: Aerial view of the site outlined in red and surroundings (Source: Google)

- 2.6. To the southwest are various detached residential dwellings and commercial buildings along Bath Road and Milley Lane which extends to include the other garden centres at Hare Hatch adjoining the junction of Bath Road/New Bath Road (A4) and London Road (A3032). An image of the site access from Bath Road is provided over the page.



Fig 3: Google street view looking westwards along the south side of Bath Road (A4)

- 2.7. There is a pavement along the northern side of Bath Road that leads into Hare Hatch and then via London Road into the centre of Twyford walking in a south-westerly direction. At Hare Hatch, there are some services including retail sales (including groceries) from the two garden centres alongside a public house. Hare Hatch provides hourly weekday bus services to Twyford, Reading and Maidenhead, which are accessible from the bus stop at the public house (within 400m from the site) from where the services take 4 minutes to Twyford, 20 minutes to Maidenhead town centre, and 34 minutes to Reading town centre.
- 2.8. The application site is 1.38 hectares in area and is broadly rectangular in shape and would be accessed direct from Bath Road to the north.
- 2.9. A series of photographs are presented below to illustrate the existing site and its immediate surroundings.



Fig 4: Google street view along the site frontage looking west, with the existing buildings clearly visible



Fig 5: Google street view of the existing access to the garden centre with the car park in foreground

- 2.10. The map over the page shows the site and existing built form in the vicinity of the site.

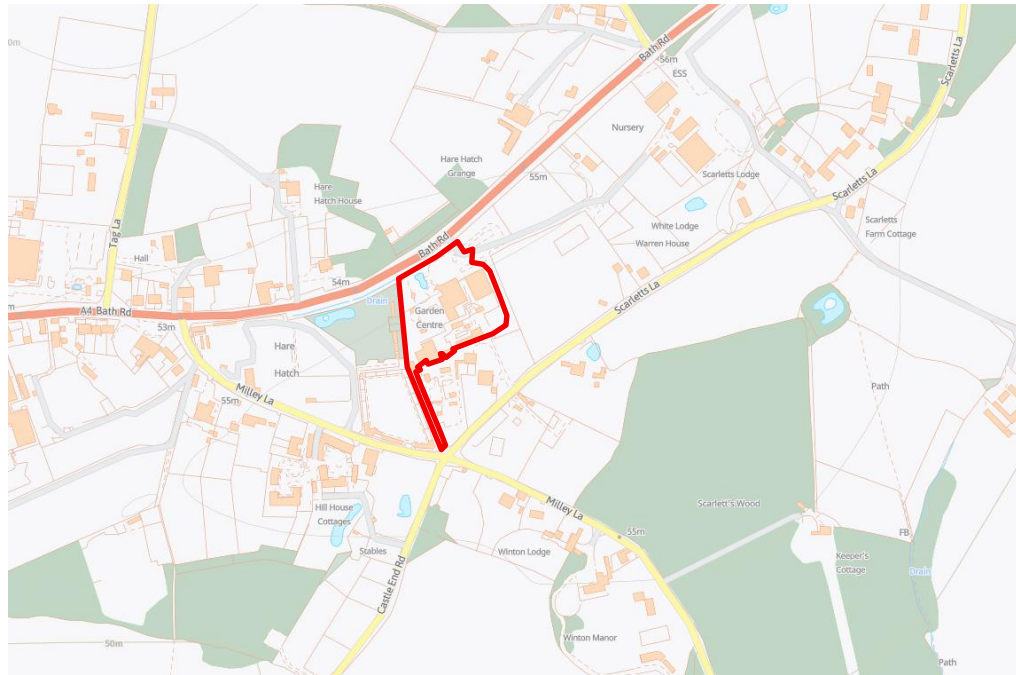


Fig 6: Site and surrounding area, from Wokingham Borough Council online planning maps service (red line approximate)

- 2.11. The site is not notated with a Settlement Policy Boundary in the development plan and is therefore in a 'countryside' location. The site and surrounding area are washed over by the Green Belt designation. The land to the west of the site lies in the Hare Hatch Area of Special Character. However, it is clear from the map extracts and site photographs that there is a significant amount of existing development in the immediate vicinity of the site, with residential development located to the north-east, southwest and east. A copy of the site's location on the Wokingham Borough Policies Map is provided over the page.

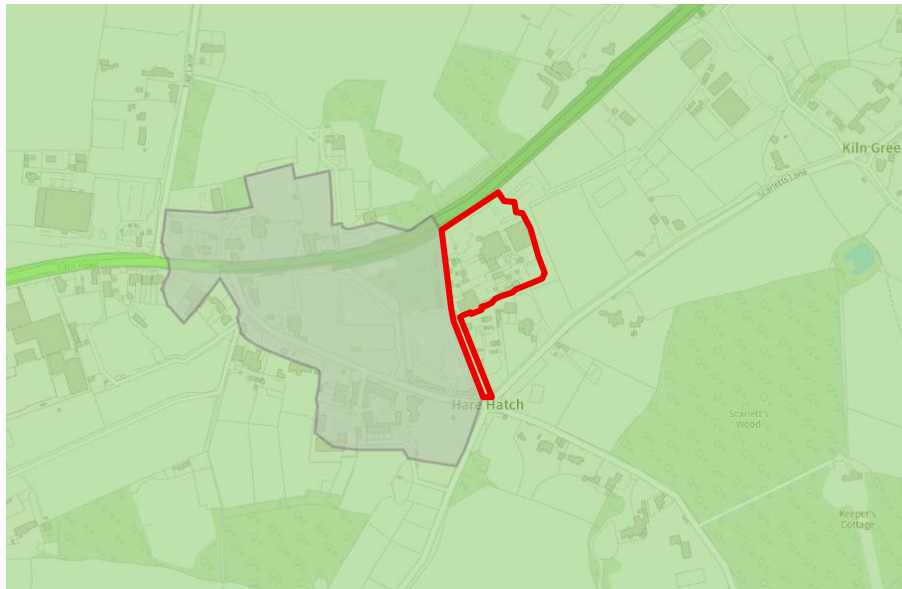


Fig 7: Extract from Wokingham Borough Adopted Policies Map – site shown indicatively edged in red

- 2.12. In addition to the extensive number of buildings on site, there are a number of other structures including sheds, conservatories, summer houses, tanks and steel shipping containers.
- 2.13. The site is situated within flood zone 1, according to the Environment Agency flood maps, meaning a low probability of flooding from rivers.

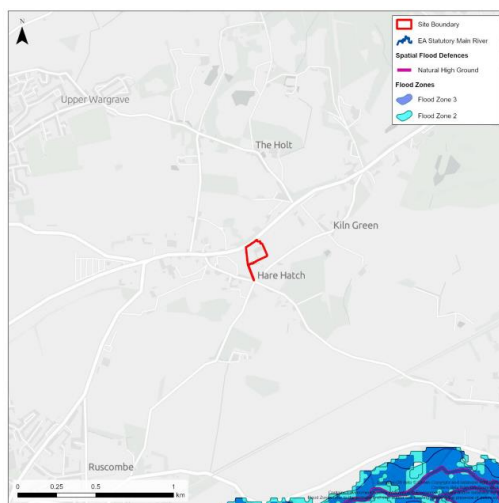


Fig 8: Flood risk map centred on site (red line boundary approximate) from Flood Risk Assessment submitted with application

Planning History

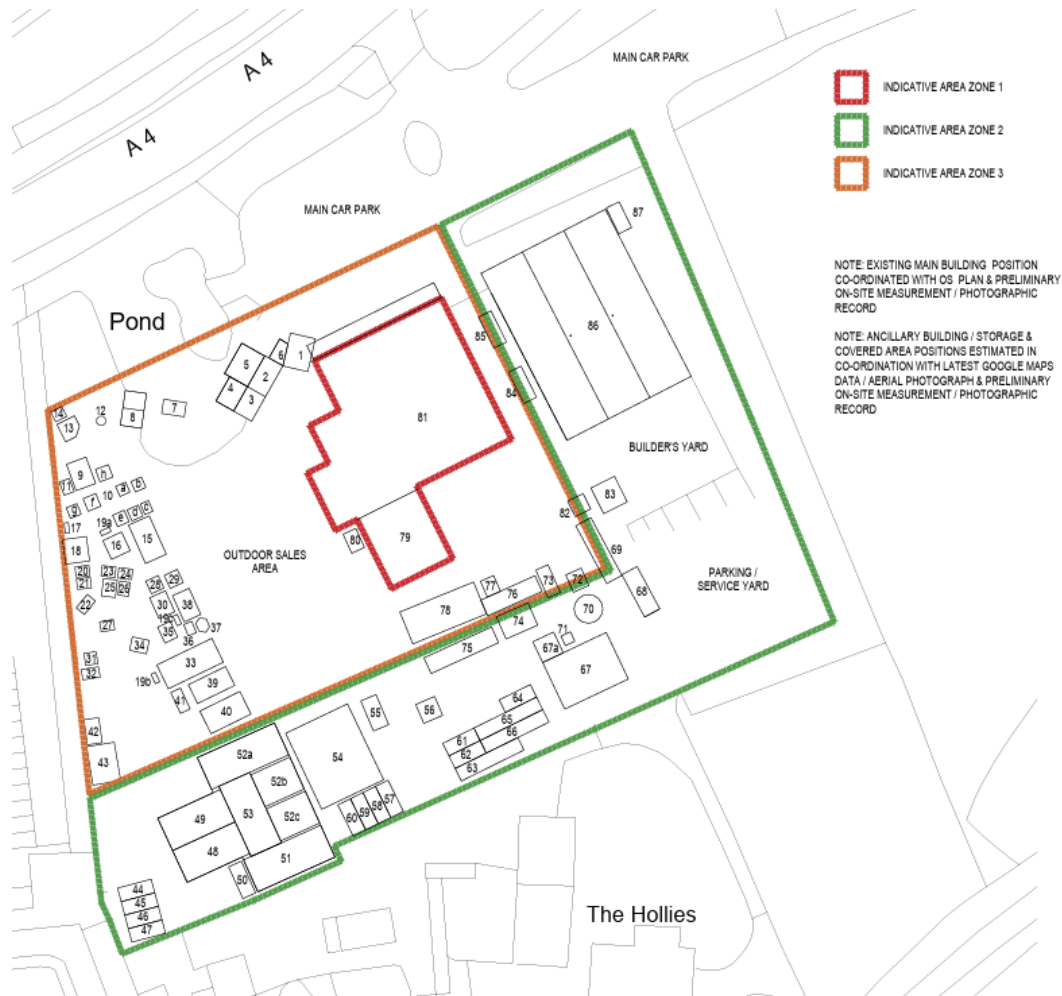
- 2.14. The site has been subject to a number of historic planning applications. A detailed summary is provided in the Council's assessment of the most recent application relating to the site at pages 2 to 3 of the officer's report (Annex A to this Statement). This was approved in February 2021 (LPA Ref. 203085) for the below development)

“Full application for the proposed replacement of the roof and new cladding plus changes to fenestration on the main building; enclosure of existing café terrace and creation of new external café terrace and pergola; re-levelling of the external sales area and erection of a replacement covered sales area, plus demolition of existing structures. (Part Retrospective)”

- 2.15. The Design & Access Statement supporting the February 2021 approval provides some further detail in relation to the aims of the 2021 application:

- 2.2 The 'Garden Village' is made up at present of several different businesses, some connected to the garden centre trade and others with a more tenuous connection. The intention is to develop the business into a garden centre which sells the items that are normally associated with a garden centre, such as Dobbies.
- 3.1 It is proposed to make the improvements to the site in 3 phases. Phase 1 will include the urgent repairs and improvements to the fabric of the main Garden Centre building; the extension of the enclosed sales area at the rear and the external café area and the outside public areas will be improved and made safer, particularly the external plant sales area. It is the Phase 1 works that are the subject of this application.
- 3.2 Phase 2 will include the re-organisation of the existing floorspace on the site to create a more coherent, single Garden Centre unit rather than the myriad of different buildings and businesses that have evolved. This will involve the clearance of the area to the rear of the Garden Centre, which is not open to the public. This has become an untidy dumping ground for various paraphernalia and an external storage area for equipment and old stock. The intention is to landscape this area to make it an attractive location for customers to wander and sit. Phase 2 will be the subject of a further planning application.

- 2.16. The below Existing Site Plan and schedule illustrate the referenced 3 phases and the existing uses on the site:



2.17. Since the 2021 permission, a number of the listed sheds have been removed and a number of works undertaken to extend the main building (implemented as per the approved 2021 application). Parts of the site remain operational albeit at a low intensity of employment generation.

2.18. The officer's report provided an overview of the planning site status, and stated at page 10:

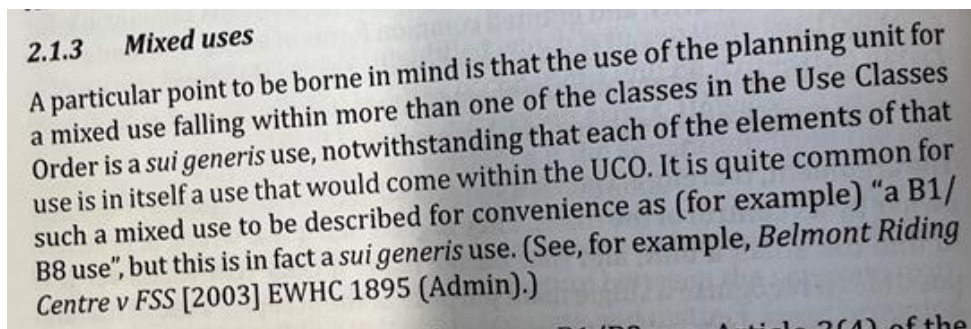
Site Description:

The application site is comprises a mixed use. The site comprises established garden centre (A1) and horticultural use with a sui generis use (Bird of Prey Centre) to the rear

of the site. The site is accessed from the A4 with parking area (85 parking spaces) to the front of the site.

The site is located outside the settlement limits, within the Countryside and land designated as Green Belt. The site lies outside the Hare Hatch, Wargrave Area of Special Character the boundary of which abuts the western edge of the site.

- 2.19. By forming a mixed use, the site is in a Sui Generis use in planning law, meaning it is "of its own kind" and doesn't neatly fit within the predefined use classes. This principle is helpfully confirmed in the renowned Planning Lawyer Martin Goodall's book "The Essential Guide to THE USE OF LAND AND BUILDINGS":



- 2.20. The officer's report relating to application 203085 at page 13 then provided details on the floorspace and volume of the buildings on the site and indicated:

It has been outlined above that the proposed development does not represent inappropriate development in the context of the Green Belt. However, redevelopment of this site would only be acceptable providing there is no greater impact upon the openness of the Green Belt than the existing buildings. Officers are of the view that, providing the applicant can demonstrate that the proposal would be similar in terms of volume of built form and footprint.

Many of the buildings and structures on the site to be demolished have been in situ since at least 2010 (see Google Earth aerial maps). These are therefore established structures and due to the passage of time are immune from enforcement action. Those within the red line, have been included in the below calculation. Structures for example hot tubs have been excluded from the below calculations as they do not constitute development.

	As existing	To be demolished	As proposed
Floorspace (sqm)	2583.2	749	2228.04
Volume (cubic metres)	10028.2	1888	9392.2
% change	-13%		-6%

Note: Calculations have been made based on floorspace and volume information submitted by applicant.

- 2.21. The plans submitted with the application¹ indicate that the volume of the existing permanent buildings together with the consented extension totals 11,647m³ with a footprint of 2,664m². The reason for the modest difference between the above figures and those detailed in the planning application are that the red line relating to this previous application was more tightly drawn than is proposed in the subject application.
- 2.22. Recognising the site's location in the Green Belt, the officer's report (pages 12 to 13) appraised the refurbishment of the existing Garden Centre as proposed for consistency with the relevant policy. This states:

"The assessment of development within the Green Belt is twofold. It comprises an assessment of whether the proposal constitutes inappropriate development and whether the development impacts on the openness of the Green Belt.

Whether the proposal represents inappropriate development within the Green Belt

Paragraph 143 of the NPPF makes it clear that inappropriate development within the Green Belt is by definition harmful. The proposal meets exceptions (c) & (d) within paragraph 145 and can therefore be considered appropriate development within the Green Belt.

Impact on the openness of the Green Belt

Para. 133 of the NPPF indicates that 'openness' is an essential characteristic of the Green Belt. The term

¹ Landscape comparison drawing P25/09/S103 provides details of the footprint with drawing P25/09/S/104 supplying information on volume

openness is not defined in the NPPF, however given the lack of definition, it could reasonably be interpreted as the absence of built development. Openness can be harmed by (among other things) new built form, external storage, extensive hard standing, car parking and boundary walls or fencing. Landscapes are very important to the openness and amenity of the Green Belt. The visual impact on landscape forms part of the consideration of harm and is not just associated with views from public vantage points.

Openness is an essential characteristic of the Green Belt, and it is clear that openness should not only be viewed in its visual context, but also its spatial context. The presence of permanent built form where there was none previously is contrary to the intention of Green Belt policy, and therefore is harmful to the Green Belt. This view is supported by various High Court judgements. Screening does not negate the fact the openness of the Green Belt would be adversely impact

It has been outlined above that the proposed development does not represent inappropriate development in the context of the Green Belt. However, redevelopment of this site would only be acceptable providing there is no greater impact upon the openness of the Green Belt than the existing buildings. Officers are of the view that, providing the applicant can demonstrate that the proposal would be similar in terms of volume of built form and footprint.

...

The proposal reduces the built form on the site in terms of both floorspace and volume. It is also noted that further buildings (outside the red line, but inside the blue line) are to be demolished (see building 54 Demolition Plan 9961 PL011 Rev B) further reducing the built form on this site however this building has not been included in the above calculation. The proposed development is consolidating the built form on the site. The scheme would result in the 'greening' up of a site, move the built form away from the edge of the site and result in a lower volume of built development within the site.

The creation of one larger central building which will assist in reducing the spread of buildings and structures across the site as a whole which further assists in reducing the visual impact of the development. On this basis, it is not considered that the proposal would not harm the openness of the Green Belt and therefore the proposal is considered to comply with paragraph 89 of the NPPF.

VSC therefore do not need to be considered.”

- 2.23. The previous consideration of the impacts of development at Ladds Garden Centre on the Green Belt remain pertinent given that the application entails the redevelopment of a previously developed site and the identification of the 2021 application as appropriate development. This proposal is brought forward consistent with NPPF paragraph 154(g) that requires a scheme proposing the redevelopment of previously developed land to not cause substantial harm to the openness of the Green Belt. As detailed later in this statement, the scheme comfortably passes this test.

3. THE DEVELOPMENT PROPOSALS

- 3.1. This Planning Statement has been prepared in support of a planning application for:

Erection of 19 dwellings, associated parking, landscaping and access and demolition of existing buildings.

- 3.2. The site measures 1.38 hectares and the levels fall gently from north to south. The scheme proposes the full redevelopment of the site including the demolition of all existing buildings. The proposed dwelling mix comprises 2 no. 1 bed, 2 no. 2 bed, 12 no. 3 bed and 3 no. 4 bed dwellings, in a largely housing led form. A copy of the submitted layout plan is provided below.



Access & Landscaping

- 3.3. The main site access uses the existing access from Bath Road which is to be remodelled such that the existing large car park on its frontage is removed and replaced by green landscaping and public open space. The existing access drive would be retained and continue to serve the residential development. A service road to enable access to the field to the south of the site would be retained. Further details on the access arrangements, including vehicular tracking diagrams demonstrating its suitability for the expected traffic are provided in the Transport Statement. The site access junction and route through the site have been tracked and visibility splays checked by the project's highway consultant. Parking provision accords with adopted standards.
- 3.4. An off-site upgrade is proposed to the west of the proposed upgraded access onto Bath Road to enable easier crossing of this highway and thereby onto the bus stops and other services within 400 metres on the access in the vicinity of the public house (Horse & Groom). This will also facilitate pedestrian access through to the local grocery store at Sheeplands.
- 3.5. A range of dwellings are provided, including maisonettes, semi-detached and detached houses. Public open space including a children's play area would also be provided and could be integrated with the wildlife SuDS pond as shown. A high quality public open space scheme located at the entrance of the development alongside enhanced landscaping along the Bath Road are proposed. Further, tree lined streets and a meandering access road through the site are proposed, consistent with good urban design principles.
- 3.6. SuDS has been incorporated in order to effectively manage surface water drainage. The initial drainage strategy includes with permeable paving and an attenuation pond.

Scale, Density & Appearance

- 3.7. A traditionally designed, low density, housing led scheme is proposed. The density comprises circa 14 dwellings per hectare. It is therefore low and reflective of the site's semi-rural location. The design of the dwellings includes

traditional architecture features and varied types and styles so to ensure a positively planned and well designed scheme. All dwellings benefit from large private garden areas and parking provision consistent with standards. Dwellings purposely face towards the access road and areas of public open space so to ensure a strong and active presence towards the public realm. When compared to the functional and sprawling nature of the existing buildings and associated hardstanding on the site, the scheme offers an opportunity for a substantial improvement in design quality.

4. PLANNING POLICY CONTEXT & THE SCHEME'S ASSOCIATED RESPONSE

Development Plan Policy

- 4.1. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan, against which the application should be determined, comprises:
- Wokingham Borough Core Strategy (CS) (January 2010); and
 - Wokingham Borough Managing Development Delivery Local Plan (MDD) (February 2014).
- 4.2. As shown on the Wokingham Borough Proposals Maps, the application site at Hare Hatch lies in the Green Belt and adjoins the Hare Hatch Area of Special Character. It also lies in countryside.
- 4.3. Relevant development plan policies against which the application will be considered are set out in the table below:

Relevant Wokingham Borough Development Plan policies for the application

	Subject
Core Strategy	
CP1	Sustainable development
CP2	Inclusive communities
CP3	General principles for development
CP4	Infrastructure
CP5	Housing mix, density and affordability
CP6	Managing travel demand
CP7	Biodiversity
CP9	Scale and location of development
CP11	Proposals outside development limits
CP12	Green Belt
CP17	Housing Delivery
MDD	
CC01	Presumption in favour of sustainable development
CC02	Development limits

	Subject
CC03	Green Infrastructure, trees and landscaping
CC04	Design and construction
CC05	Renewable energy
CC06	Noise
CC07	Parking
CC09	Flooding
CC10	Drainage
TB01	Development within the Green Belt
TB05	Housing Mix
TB21	Landscape and character
TB23	Biodiversity and development
TB25	Archaeology
TB26	Buildings of Traditional Local Character and Areas of Special Character

4.4. The Wokingham Borough Core Strategy (January 2010) alongside the Managing Development Delivery (“MDD”) Local Plan (February 2014) provide the spatial approach to development across the Borough, including the focusing of growth to towns (Major development locations), large villages (modest development locations) and small villages (limited development locations). It seeks minimal development in areas outside of the settlements in the countryside generally and Green Belt specifically. However, the Core Strategy was prepared in the mid 2000’s and within a different planning context, given the requirement at that time to accord with the South East Plan (the Regional Spatial Strategy)². The South East Plan has been revoked and the approach to planning fundamentally changed with the publication of the various versions of the NPPF, most recently in December 2024.

4.5. Core Strategy Policy CP17 required the delivery of at least 13,230 dwellings across the Borough between 2006 and 2026 (an annual average of 661 dwellings). However, that target was prepared in the mid 2000’s and planned for a spatial strategy that covers to only March of next year. The housing target and the associated development plan policies have not been updated to reflect the far greater levels of need now identified under the standard method. Consistent with the methodology required by the 2024 NPPF and PPG, the

² See Core Strategy (figure 1.2 and paragraphs 1.9 & 2.1-2.3).

Council's base housing need comprises 1,317 dwellings per annum³. The Council accepts that it is unable to demonstrate a 5-year supply of housing, with the information published in August 2025 showing a maximum of 2.5 years over the 5 year period April 2025 through to March 2030. The accepted housing land supply deficit means that NPPF paragraph 11(d) is engaged. As discussed throughout this statement, there are no constraints that would provide a strong reason for refusing the development proposed and accordingly, the tilted balance as required by part (ii) of this policy is clearly engaged.

- 4.6. As discussed later in this statement, very limited weight must therefore be attached to certain existing development plan policies. These include, inter alia, Policies CP9, CP11, CP17 and CC02.
- 4.7. Other relevant policies in the Development Plan are summarised below.
- 4.8. Policy CP1 provides the framework for achieving sustainable development.
- 4.9. Policy CP5 seeks at least 40% of homes on sites outside of settlements (including previously development land) as affordable housing, where at least 5 dwellings are proposed (or the site extends to at least 0.16ha). The policy is clear that this requirement is subject to viability. This application is supported by a comprehensive Viability Assessment for the Council's review.
- 4.10. Policies CP5 and TB05 promote a range of housing types and tenures which reflect the demand for market housing and need for affordable housing, as well as specialised housing need. This is amplified by Policy TB07 in referring to internal space standards.
- 4.11. Policy CP6 highlights the need to manage travel demand in the Borough and is supported by Policy CC07 which outlines the parking standards.

³ Taking account of the median workplace based affordability ratios published 24th March 2025 and the dwelling stock data released 22nd May 2025

- 4.12. Policy CP4 aims to ensure that sufficient physical, social and community infrastructure is provided alongside developments.
- 4.13. Policy CC03 aims to strengthen the role of the Green Infrastructure Network and promote accessible and integrated green infrastructure through the Borough with Policy TB08 setting the standards for open space.
- 4.14. Policy CP7 seeks to conserve and enhance biodiversity within the Borough.
- 4.15. Policy CP3 considers that development will be acceptable where it can achieve certain design principles and reflects area specific design and character features.
- 4.16. Policies CC09 and CC10 aims to manage flood risk and reduce the volume and rate of surface water run-off.
- 4.17. The Borough Council has also produced a number of Supplementary Planning Documents ("SPD's") that are relevant to the planning applications. These include the Borough Design Guide SPD and Affordable Housing SPD.

New Local Plan

- 4.18. The Council submitted their new Local Plan for Examination on 28th February 2025. Hearing sessions chaired by the Inspectorate are anticipated in autumn 2025. However, the form and content of the sessions are unknown pending the Inspector's consideration of the Council's responses (18th June) to the initial questions they raised (letter from the Inspector dated 17th February). Consequently, the timings and arrangements for the examination remain uncertain whilst the Inspectorate consider the response of the Council since as of 10th September 2025, no updates from the Inspector considering the Council's response has been received.

4.19. The submitted new Local Plan was prepared and is to be examined under the December 2023 NPPF and seeks the delivery of a minimum of 12,763 dwellings from April 2023 through to March 2040 (an average of 751 dwellings annually). Whilst the Plan is to be examined for consistency with the December 2023 edition of the NPPF, the December 2024 version has fundamentally changed the way in which development proposals on Green Belt land should be considered. As explained above, it has also changed the methodology for determining housing need which results in the current requirement for 1,317 dwellings annually, 75% higher than the 751 dwellings sought each year by the submitted Plan. We have submitted objections to the yet to be examined emerging Local Plan at the Regulation 19 stage. At this stage, the emerging plan benefits from only very limited weight as a material consideration.

National Planning Policy Framework ('NPPF') (December 2024)

4.20. The application is submitted with particular regard to paragraph 154 (g) of the NPPF. This provides that development is appropriate in the Green Belt where it entails:

“limited infilling or the partial or complete redevelopment of previously developed land (including a material change of use to residential or mixed use including residential), whether redundant or in continuing use (excluding temporary buildings), which would not cause substantial harm to the openness of the Green Belt”

4.21. As discussed in section 2 above (and with reference to the Council's planning history), the site comprises a garden village, with associated mixed uses and therefore falls within the Sui Generis use class. Pursuant to NPPF paragraph 154(g), the site's complete redevelopment is not inappropriate subject to consideration of whether the proposals would cause substantial harm to the openness of the designation.

4.22. At this stage, it is noted that this comprises a new test following an amendment to this paragraph in the December 2024 version of the NPPF.

- 4.23. The Courts through the judgment in *Mole Valley DC v Secretary of State for Housing, Communities and Local Government* [2025] EWHC 2127 (Admin) reaffirmed the decision in *Lee Valley Regional Park Authority v Epping Forest DC* [2016] EWCA Civ 404. The Mole Valley judgment (paragraphs 60 to 63) states:

The first point is based on what is said to be a straightforward and not strained reading of NPPF 2024 [153]. This provides that, “When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt, including harm to its openness.” Mr Goodman’s submission is that “any planning application” means what it says and is not confined to applications in respect of inappropriate development. The difficulty with that reading is twofold: first, it is inconsistent with the reasoning in *Lee Valley*, which, as I have concluded, was not wrongly decided and remains good law in this context second, it is a reading that is inconsistent with the history and development of the relevant policy statements.

As to the first difficulty, it is notable that the Claimant’s argument is similar to that which was run and rejected in *Lee Valley*: see [14] and [15] of *Lee Valley* (set out above at [42] and [43]). The reasons for rejecting the argument are comprehensively set out in *Lee Valley* and apply equally here. The fact that *Lee Valley* was concerned with the application of an earlier version of NPPF (NPPF 2012) does not negate its applicability to the present case. Many of the key features of Section 9 of NPPF 2012, entitled “Protecting Green Belt Land” appear in Section 13 of NPPF 2024, which bears the same title, as they did in the predecessor PPG 2. These include the distinction between appropriate and inappropriate development (which was a principal concern in *Lee Valley*), the fact that new development is by definition inappropriate unless it falls within an exception, the fact that some exceptions are qualified and others are not, and the fact that inappropriate development is deemed to give rise to harm and requires to be justified by VSC. The requirement in [153] of NPPF 2024 that when considering any planning application substantial weight is to be given to any harm to the Green Belt, including harm to its openness, must not be read in isolation (as the Claimant’s argument necessitates)

but in the context of the totality of the policy, including the provision made for development falling within one of the exceptions and which is thereby deemed not inappropriate. If such appropriate development still had to be subject to an openness analysis with harm being given substantial weight, it would negate the purpose of having exceptions: see *Lee Valley* at [21].

- 4.24. Therefore, although criterion (g) of NPPF paragraph 154 references a need to consider the extent a proposal does not cause substantial harm to the openness of the Green Belt, this is within the context that redevelopment of previously developed sites is considered acceptable, notwithstanding their resulting impacts upon openness.
- 4.25. The existing site includes many structures spread across the site which alongside the hardstanding areas (car parking, service yards and display areas) all have roles in limiting its existing contribution towards the openness of the Green Belt. This is explored further below, especially as the planning history section above notes, this reflects the approach of the Council when approving the most recent 2021 application on the site (LPA Ref. 203085).
- 4.26. In support of the application, a series of existing site plans, built form / landscape comparison plans and associated calculations have been prepared by the project's architect. The same comparisons have been prepared in relation to the proposed scheme. A quantitative comparison between the existing and proposed is provided in the below table:

Parameter	Existing	Proposed	% change
Floorspace (GIA) (m ²)	2,836	2,776	-2%
Footprint (m ²)	2,664	1,702	-36%
Volume (m ³)	10,460	11,647	11%
Hardstanding (m ²)	9,440	3,589	-62%

Overall Built Envelope (Total Footprint & Hardstanding) (m2)	12,104	5,291	-56%
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- 4.27. The proposed scheme includes significant reductions in footprint and hardstanding on the site compared to the existing site. It is noted that there is also some existing built form that remains consented but uncompleted and some other structures on the site. None of these have been included in the above comparison figures. Whilst the increase in volume is modest, this can be considered acceptable when evaluated against the large reductions in footprint and hardstanding on the site and the smaller reduction in floorspace.
- 4.28. Although dwellings are proposed around the site, their placement acknowledges the arrangement of current buildings and structures, which minimises impacts upon the wider openness. With respect to the heights, the existing main retail building is around 7.2m tall and this therefore establishes the wider context.
- 4.29. The approach to determining the impact upon openness has been discussed many times in the courts, with particular reference to *Turner* which in *Euro Garages Ltd v SSCLG & Anor [2018] EWHC 1753 (Admin)* alongside the more recent *Lee Valley and Mole Valley judgments referenced above*. The findings of the *Euro Garages* judgment are succinctly summarised in an appeal at Coombe Hay⁴ in which (at paragraph 8), the Inspector stated:

“My approach to an appraisal of the effect on openness is informed by a number of judgements of the Courts and some of these are referred to in the grounds of appeal. In addition to those already cited for the appellant, I am aware that in Euro Garages Ltd v SSCLG & Anor [2018] EWHC 1753 (Admin) the judge indicated that rather than treating any change as having a greater impact on openness of the Green Belt, the correct approach is to consider the impact or harm, if any, wrought by the change (my emphases). The

⁴ PINS Ref: APP/M3645/D/20/3262416

judgement added that whether or not any change will have an adverse impact, and so cause harm to openness, might depend on factors such as the scale of the development, its locational context, and its spatial and/or visual implications.
(Our emphasis)

- 4.30. With reference to the relevant case law, in a spatial sense, the scheme results in an overall reduction in the amount of built footprint (a reduction of 36%) on the site. In addition, the existing buildings and hardstanding extend to the site's boundaries (including the large car parking area on the site's frontage) and the overall depth and built footprint is substantially consolidated on a smaller part of the site through the proposals. This results in a compacting of the overall built form on the central / southern part of the site only and less sprawl of built form. This is particularly achieved through the removal of the existing car parking area and its replacement with landscaping, a pond and associated play areas on the site's northern side. In short, less Green Belt land (and substantively less) is developed with built footprint (be that building or hardstanding) through the proposals when compared to the existing situation.
- 4.31. The substantial reduction in footprint and hardstanding, alongside for compaction of building and hardstanding within the site are illustrated on the Built Form Volume Comparison and Landscape Comparison drawings extracted over the page.

EXISTING SITE



PROPOSED SITE



Extract from Built Form Volume Comparison Drawing



Extract from Landscape Comparison Drawing

- 4.32. In a visual sense, the proposed dwellings are consistent with the prevailing height and designs of neighbouring properties. The scheme is supported by a comprehensive Landscape & Visual Impact Assessment (“LVIA”) prepared by fabrik. This identifies the site as comprising a degraded brownfield character and that the site currently makes little positive contribution to local landscape character. Further, visual influence is considered in detail and identified to be localised and are primarily restricted to close range receptors. The LVIA concludes (at section 10.1) as follows:

“In terms of landscape effects, the development will result in a positive transformation of a degraded brownfield site into a sensitively designed residential environment. By retaining key features such as the pond and boundary vegetation, and by introducing well-considered landscape enhancements, the proposals will improve the character and quality of the Site and its immediate surroundings. The resultant landscape effects are therefore assessed as Minor to Moderate beneficial.”

With regard to visual impact, the proposed development will lead to an improvement in views for both identified receptor groups - users of the A4 (Bath Road) and residents at The Hollies. From the A4, the existing derelict structures will be replaced with a carefully articulated residential frontage softened by new planting, reducing visual discordance and

enhancing the approach into Hare Hatch. For adjacent residents, particularly those overlooking the Site, the proposed dwellings will offer a more coherent and appropriate built form that responds to the established character of the area. The visual containment offered by existing and proposed vegetation will ensure that the scheme sits comfortably within its setting. As such, visual effects are considered to be Minor beneficial overall". (Our emphasis)

- 4.33. It follows that in a visual sense; the scheme offers beneficial impacts when compared to the existing situation.
- 4.34. Overall, the spatial dimension of the proposal can be deemed to be an improvement (or at least similar) to the existing situation. The scheme enables the consolidation of built form within the centre of the site and an overall substantial reduction in footprint and hardstanding. The increase in volume is modest. Whilst the visual dimension results in an improvement. When the existing and proposed are compared and the quantitative and qualitative merits of the scheme considered, the scheme can be identified to have no greater impact upon the openness of the Green Belt than the existing development.
- 4.35. This view on the no greater impact upon the openness of the Green Belt is reinforced by the findings of the Green Belt Review prepared for Bracknell Forest Council alongside Wokingham Borough as part of the evidence for the submitted Local Plan Updated. In the Green Belt Review the site lies in parcel W17 for which its contribution towards the wider openness is interrupted by the built structures on the application and other sites. The review whilst it noted that the wider parcel was in the countryside east of Twyford, its contribution would have been influenced by the extent of built form. This is therefore a further illustration of the position that the scheme would not have a greater impact upon the openness of the Green Belt, especially given the intrusions of various types of development in the wider character of the parcel.
- 4.36. Were a contrary view to be taken, it is important to recognise that the approach in NPPF paragraph 154, criterion (g) is a need to determine whether

“substantial harm to the openness of the Green Belt arise”. This nuanced approach was considered in the appeal for the adjoining Bird Gardens site where the Inspector (paragraph 25) stated:

“It is now important, as set out in the Court Order, to turn to the second indent of Paragraph 149 g) and consider this. The Order sets out that ‘A decision that the developments proposed would have a greater impact on the openness of the Green Belt than the existing development is not the same as a decision that the development would cause substantial harm to that openness.’ In this respect, as a matter of planning judgement, I have found that the proposal would result in no greater than moderate harm to the openness of the Green Belt. Accordingly, it would satisfy this element of the second indent.”

- 4.37. In the case of the appeal on land at The Bird Gardens (which is located adjacent to the site and therefore highly relevant), the Inspector consequently (paragraph 27) determined that the scheme in that case did not represent inappropriate development in the Green Belt. The subject proposal actually results in no greater impact upon the openness of the Green Belt and does not come anywhere near breaching the threshold of a substantial impact upon the openness of the Green Belt. The proposals therefore comply with NPPF paragraph 154 (g) and form appropriate development in the Green Belt.

Further NPPF Considerations

- 4.38. Further NPPF considerations are of relevance to this application. The NPPF is underpinned by a presumption in favour of sustainable development, with three overarching, but interlinked objectives. Paragraph 8 is relevant to the application as the proposal would help to deliver each of the strands of sustainable development:

- a) An economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth...**
- b) A social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of**

present and future generations; and by fostering well-designed, beautiful, safe places, with accessible services and open spaces that reflect current and future needs and support communities health, social and cultural well-being; and

- c) An environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change including moving to a low carbon economy.**

4.39. The proposal will help to deliver each of these objectives, thereby responding to the requirement in paragraph 10 of the NPPF that development is pursued in a positive way, reflecting the presumption in favour of sustainable development which sits at the heart of the Framework.

4.40. Paragraph 11 of the NPPF sets out a presumption in favour of sustainable development. Paragraph 11 (c) notes that development proposals that accord with an up-to-date development plan should be approved without delay. Further, part (d) states:

“For decision-taking this means:

...

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date⁸, granting permission unless:

i. the application of policies in this Framework that protect areas or assets of particular importance⁷ provides a strong reason for refusing the development proposed; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination⁹”.

- 4.41. At paragraph 61, the NPPF is clear that the Government's objective is to boost significantly the supply of homes, and that it is important that a sufficient amount and variety of land can come forward where it is needed.
- 4.42. NPPF paragraph 73 states that small and medium sized sites (like the application site) can make an important contribution to meeting the housing requirement of an area and are often built out relatively quickly.
- 4.43. Paragraph 78 states that Local Planning Authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old³⁹. Footnote 39 clarifies that "unless these strategic policies have been reviewed and found not to require updating. Where local housing need is used as the basis for assessing whether a five year supply of specific deliverable sites exists, it should be calculated using the standard method set out in national planning practice guidance."
- 4.44. In the case of Wokingham Borough, the Local Plan setting the Borough's housing targets (the Core Strategy) was adopted in February 2010 and is therefore over 15 years old. The Core Strategy also only provides the strategic framework for the Borough until March 2026 (less than 6 months' time). The standard method therefore applies to the housing requirement and the Council acknowledge a maximum housing land supply of only 2.5 years⁵ supply. This forms a substantial deficit and results in substantial positive weight needing to be attached to the scheme's provision of housing.
- 4.45. Paragraph 83 sets out that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are

⁵ April 2025-March 2030 as detailed in their Assessment published August 2025

groups of smaller settlements, development in one village may support services in a village nearby.

- 4.46. Paragraph 110 seeks to focus significant development on locations which are or can be made sustainable, however it recognises opportunities to maximise sustainable transport solutions will vary between urban and rural areas.
- 4.47. Paragraph 124 of the NPPF encourages planning policies and decisions to promote an effective use of land in meeting the need for home and seeks to make as much use as possible of brownfield land. The following paragraph outlines the need for planning policies and decisions to promote and support the development of under-utilised land, including encouraging multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creating or improve public access to the countryside.
- 4.48. The NPPF sets out that in accordance with paragraph 11(c), proposals that accord with an up-to-date development plan should be approved without delay. It has been demonstrated that the scheme is policy compliant with regard to on site public open space, BNG and highway impacts.
- 4.49. Of further relevance is paragraph 11(d) of the NPPF that requires that where a Local Planning Authority cannot demonstrate a 5 year housing land supply, the presumption in favour of sustainable development (the tilted balance) should apply, and planning permission should be granted unless the application of the policies in the NPPF provide a clear reason for refusing the development, or any adverse impacts of granting planning permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF when taken as a whole, and additionally in the December 2024 version; having particular regard to sustainable.

4.50. Paragraph 11(d) is further relevant in connection with this proposal, as the Council cannot demonstrate a 5 year housing land supply, and the titled balance would apply, subject to applying the policies in the NPPF and determining whether they provide a strong [WBP note – upgraded from ‘clear’ in 2023 version] reason for refusing the proposal. The site does fall within the Green Belt category covered by footnote 7 of the NPPF. The proposal therefore requires an assessment of whether any adverse impacts of allowing the development would significantly and demonstrably outweigh the benefits. This is discussed in more detail below in the assessment section later in this statement.

5. PLANNING POLICY & TECHNICAL CONSIDERATIONS

- 5.1. This section includes a summary of planning policy and technical considerations which have been prepared in support of the application, and which underpin the technical suitability, constraints and requirements for mitigation where needed.

Affordable Housing, Dwelling Mix & Heads of Terms

- 5.2. The scheme is supported by a comprehensive Viability Assessment prepared by Turner Morum. This evidences that it is not possible for the scheme to provide affordable housing. It is acknowledged that the Turner Morum assessment will be peer reviewed by a consultant upon behalf of the Council during the application process.
- 5.3. The provision of and associated management in perpetuity of the public open space can be secured through a legal agreement. As outlined in the supporting Transport Statement, a package of off-site highway measures are proposed. It is anticipated that these can be secured through the Section 278 process and secured by way of appropriate planning conditions.
- 5.4. The below extract taken from the emerging Local Plan evidences that the majority of need in the market housing sector is for 3 and 4 bedroom properties. The scheme is therefore being designed with a focus upon 3 bed properties with some 4, 2 and 1 bedroom properties in addition. The provision of predominantly detached housing is also consistent with the prevailing character of the area that is defined primarily by larger detached dwelling set within their own plots.

- 9.7 The council's Local Housing Needs Assessment (LHNA) (2023) identifies the overall need for different types of market and affordable dwellings as a percentage of the Local Housing Need, which should act as the starting point when bringing forward proposals for individual sites.

Table 7: Indicative housing mix

Number of bedrooms	Affordable Housing	Total Market Housing
1 bedroom	17%	5%
2 bedrooms	38%	13%
3 bedrooms	33%	47%
4+ bedrooms	12%	36%

Ecology & BNG

- 5.5. The application is supported by a comprehensive Ecological Appraisal and biodiversity net gain assessment prepared by ACD Environmental. The site has been found to be largely of negligible ecological importance and boundary habitats will be retained where possible. New landscaping and structural planting is proposed and a series of enhancements are envisaged within the site including nest boxes and bat boxes. The measures proposed indicate that on-site a 16.02% increase in habitat units and a 1,747.29% increase in hedgerow units are achievable thereby demonstrating Biodiversity Net Gain. The scheme will also secure a substantial re-greening of the site when compared to its current PDL status. Overall, an ecological enhancement can be secured through the proposals.

Archaeology & Heritage

- 5.6. A desk-based Archaeology & Heritage Assessment of the site and surrounding area has been carried out by ACD Environmental.
- 5.7. Section 6 of the Archaeological & Heritage Assessment provides the conclusions of the assessment. It notes that there are no heritage assets on the site and those adjoining the site (including the Hare Hatch Area of Special Character) would not be impacted upon the scheme. This includes the Grade II Listed Milestone adjacent to the site entrance for which the Assessment notes is unchanged by the proposal therefore not resulting in any harm to its significance. The Assessment also notes that the scheme is would not cause harm to the adjoining Area of Special Character – a non-designated heritage asset. No heritage impact is therefore required to be considered in the planning balance.

Flood Risk & Drainage

- 5.8. A Flood Risk Assessment and Surface Water Drainage Strategy (FRA) has been prepared by Stantec. This identifies that the site is wholly located within flood risk zone 1, with the historic flood map confirming that there have not been any historic flood events that have affected the development site. The FRA

indicates that the northern part of the site is within an area subject to potential surface water flooding.

- 5.9. SuDS have been incorporated in order to attenuate surface water drainage, with a combination of permeable paving and an attenuation pond included in the submitted drainage layout (Drawing Ref 332611948/001 Rev P02). This will ensure that there is no impact on the flood risk of neighbouring land.
- 5.10. The submitted layout ensures no dwellings are proposed in the effected northern part of the site and furthermore, to ensure safe access is maintained, a pedestrian access is provided to the south of the site which allows for a route through to Scarletts Lane. As detailed within the supporting report, the scheme will enable drainage betterment through the provision of a scheme that offers an increase in storage capacity when compared to the present situation. The scheme is therefore wholly compliant with the PPG⁶ including that there is no need for a sequential test.
- 5.11. The scheme is therefore entirely acceptable in relation to surface and foul water drainage, subject to the imposition of appropriate planning conditions.

Services

- 5.12. Electricity, water and foul water connections are understood to be available from Bath Road. Telecommunication connections are also understood to be available along Bath Road. The applicant will pursue relevant utility upgrades as necessary consistent with other legislation outside of the planning process.

Ground Conditions

- 5.13. A Preliminary Risk Assessment and Site Investigation (Phase 1) Survey has been carried out by Aviron. The scheme is therefore entirely acceptable in relation to ground conditions, subject to the imposition of appropriate planning conditions.

⁶ Paragraph: 027 Reference ID: 7-027-20220825 Revision date: 17 09 2025

Highways

- 5.14. A Transport Statement has been prepared by iTransport which sets out the site's accessibility, parking standards and details of the proposed site access to serve the development. Further, it identifies that the overall number of trip movements will reduce through the proposals. It confirms (section 7) the acceptability of the scheme in highway and transport terms.
- 5.15. The site access is retained at the existing point on Bath Road which provides the route to the service road into both the residential development.
- 5.16. A package of off-site highway works that can be secured by planning condition and ultimately through a Section 278 agreement are detailed within the Transport Statement and can secure enhancements to the local highway network so to facilitate improved links both to Twyford village, the bus stops on Bath Road in the vicinity of the Horse & Groom public house and the local grocery store at Sheeplands to the west. Finally, the scheme has been tracked to ensure access for larger vehicles can be achieved and car parking provision has been proposed in accordance with adopted standards. The scheme is therefore wholly acceptable in relation to accessibility and access considerations.

Accessibility

- 5.17. Local shops and facilities are within cycling distance of the site, mostly within Twyford village circa 3km to the south-west, with some services available (other Garden Centre and a public house (Horse & Groom) within walking distance at Hare Hatch (425m). Bus services are available from Bath Road within a 280 metre walking distance from the site. These form hourly services running throughout the working day and provide access to the largest settlements in the region. Namely, Reading, Twyford and Maidenhead.
- 5.18. The test at NPPF paragraph 110 is that significant development should be focused on locations which are or can be made sustainable, offering a genuine

choice of transport modes. However, it is also recognised that opportunities to maximise sustainable transport solutions will vary between urban and rural areas. The scheme offers an improvement to wards accessing public transport as detailed within Transport Statement. Further, the site is within a short walking distance of regular bus services. It follows that the scheme conforms with the requirements of NPPF paragraph 110. Critically, the development would benefit from access to a regular non car mode of travel (the bus). In addition, the existing retail use that is in place on the site would in itself be considered to create a similar (if not greater) generation of private transport movements. In turn, even if the site were considered not to be a sustainable location, this is mitigated by equally removing an existing use from that (suggested) unsustainable location. For the reasons detailed, the site forms a sustainable location. Further detail is provided within the Transport Statement.

- 5.19. It is therefore clear that Hare Hatch is an appropriate location for residential development and that the scale of development would take account of the specific access to local services. Furthermore, as is outlined below, it is highly relevant to consider the benefits associated with the redevelopment of brownfield land.

Landscape & Visual

- 5.20. The application is supported by a comprehensive Landscape and Visual Impact Assessment prepared by fabrik. This identifies that due to the site being almost wholly covered in retail buildings and hardstanding and being in a poor state of repair, it is of a low landscape quality. It is not representative of any landscape feature or element of value and therefore is of a low landscape value and sensitivity. Further, views of the site are identified to be localised and self-contained. In addition, the site is very well related to the existing area of suburban development which occurs to the west, south and east of the site.
- 5.21. The proposed housing development will be much more reflective of the character of the site's predominantly residential surroundings and will introduce large areas of public open space and planting. The result is a beneficial change

to the character of the landscape and townscape. There are therefore no landscape reasons to preclude development and it is a logical location for housing redevelopment. In conclusion, the supporting LVIA identifies the landscape effects of the development as minor to moderate beneficial and the visual effects as minor beneficial. The scheme therefore offers an important enhancement in landscape and visual terms.

Character & Appearance / Public Open Space

- 5.22. A comprehensive design approach has been undertaken as part of the preparation of the planning application. This is detailed within the supporting Design & Access Statement.
- 5.23. In summary, the existing site photos show how the existing site in visual and design terms plays no beneficial role in contributing any form or sense of place to this part of Hare Hatch. The Design & Access Statement identifies the neighbouring residential developments at Hare Hatch to have densities similar to those proposed through this scheme. The proposed density at 14 dwellings per hectare can be described as low but commensurate with the site's neighbours. Further, the design is broken up into a number of different character areas to feature a frontage to Bath Road and then a low density residential scheme behind.
- 5.24. As highlighted in the supporting visuals, street scenes and illustrative elevations, a high quality of design can be secured. The proposed density is consistent with adjacent neighbouring examples, whilst ensuring efficient use of the land consistent with the need to respond to the Borough's pressing and demonstrable need for housing.
- 5.25. As has been explained in detail throughout this statement, the proposal forms appropriate development by virtue of passing all PDL tests outlined in criterion (g) of paragraph 154. Significant positive weight must therefore be attached to the scheme's compliance with these tests.

- 5.26. As illustrated on the Layout Plan, all dwellings benefit from good set back from the proposed street frontages and in particular the main road serving the development is a tree lined, consistent with good landscape design principles.
- 5.27. The proposal includes a large area of public open space. This would include walking routes around it, visibility of blue infrastructure and a local area of play. Incidental open space is also proposed throughout the development and large areas of private amenity are shown to serve all dwellings. It follows that the scheme provides a high quality and quantity of public open space consistent with the development plan.

Residential Amenities

- 5.28. The scheme has been designed to ensure that all dwellings will meet and exceed internal space standards. Further, all properties benefit from large areas of private amenity space and will have access to communal open space. Good separation between dwellings is provided and is further broken up with soft landscaping. Relationships with immediate neighbours are set at a good distance from shared boundaries (consistent with development management standards) and behind retained existing screening. The properties on the Bath Road frontage benefit from a conventional side to side relationship with the site's neighbours. It follows that the scheme complies with Core Strategy Policy CP3 and the Council's Design Guide.

Sustainability & Energy

- 5.29. A Sustainability and Energy Strategy has been prepared. This includes an energy demand assessment showing which selected energy efficiency, low carbon and renewable energy measures have been considered and those, which will be incorporated into the development.

Trees

- 5.30. GHA Trees have undertaken a Tree Survey on site, which provides details of the number, species and condition of the on-site trees. This information has

been used to inform the site layout and landscaping plans for the site, as well as input into the Biodiversity Metric.

- 5.31. The proposed layout plans show that the majority of trees and hedgerows around the site boundaries can be retained. The Tree Report confirms all Category A and B trees are to be retained and although some specimens are to be removed, these are those in poor health. Adequate protection can be provided to ensure all retained trees are protected throughout development in the form of barriers and/or ground protection.

Loss of the Existing Garden Centre

- 5.32. The existing site is located within the context of a number of garden centres all located within a small area of Hare Hatch. Squires garden centre located to the west remains in active regular use and Sheeplands garden centre has recently been sold and is now fully operational. The main part of the Ladds garden village is presently in a very low intensity use, with some associated concession businesses operating from the buildings located on the eastern part of the site. The existing full-time equivalent employment opportunities enabled at the site is low at circa 8 jobs (4 no. part time and 4 no. full time). Whilst some limited employment generation continues to occur at the site, the long term future of the site as a garden village business has been identified as unviable following the impact of the COVID pandemic and due to the existence of alternative (competitor) garden centres within the immediate vicinity. Accordingly, the scheme will not result in any substantive loss of employment. Further, as an existing Sui Generis use (which does not include any element of B class employment), there is no existing Local Plan Policy (such as CP15) that protects the use from redevelopment. It follows that the loss of the garden village breaches no local policy and forms only a very slight disbenefit when undertaking the overall planning balance.

Role of Previously Developed Land

- 5.33. The scheme involves the redevelopment of previously developed land and its replacement with residential development. A scheme that included similar

characteristics comprises the redevelopment of a lawful garden centre at Balcombe Nurseries on Basingstoke Road, Swallowfield. An application (LPA Ref. O/2014/1944) for 3 dwellings was approved on the site in October 2016. This was increased to 5 dwellings (LPA Ref. 173726) through an approval granted on 24th July 2019. The details of the 5 dwellings were further revised through subsequent applications, most recently approved in application 213380, granted on 12th July 2022. The table below compares the approaches on floorspace and volume changes arising from the scheme with that proposed in this application.

Location	Details	Existing	Proposed	Change
Ladds Garden Centre, Bath Road, Hare Hatch	Floorspace (GIA) (m ²)	2,836	2,776	-2%
	Footprint (m ²)	2,664	1,702	-36%
	Volume (m ³)	10,460	11,647	+11%
	Hardstanding (m ²)	9,440	3,589	-62%
Balcombe Nurseries, Basingstoke Road, Swallowfield	Footprint (m ²)	1,611	949	-41.1%
	Floor area (m ²)	1,611	1,963	+21.8%
	Volume (m ³)	3,494.4 ⁷	6,453	+84.7%
	Hardstanding (m ²)	4,916	1,535	-68.8%

5.34. This example illustrates the acceptability of the quantum and scale of development, when compared to the differences approved or proposed in this application. This adds further weight to the important point that development on brownfield land is to be prioritised wherever possible. This is particularly important in the circumstance of a large housing land supply deficit. Significant positive weight must be attached to the scheme's brownfield redevelopment character. This point is further strengthened by the fact that the scheme falls very comfortably inside the not substantial harm to openness test defined by NPPF paragraph 154 (g).

Community Involvement

5.35. Alongside submission, the applicant has written to immediate landowners and owners of the site advising them of the proposal in advance of the planning

⁷ This is only the main Garden Centre building as approved in application VAR/2003/9521

application. This letter included a copy of the proposed site plan. Interested parties will have the opportunity to respond with their comments upon the planning application through the Council's statutory publicity process.

6. SCHEME BENEFITS & PLANNING BALANCE

- 6.1. Prior to undertaking the necessary planning balance, it is important to consider that fundamentally, there is now a wholly different NPPF. This was published by the Government in order to achieve a minimum 1.5 million homes within this Parliamentary term.
- 6.2. All technical matters relating to residential amenity, highway safety, housing mix and local infrastructure are satisfactorily addressed as indicated in the application and the supporting technical reports.
- 6.3. In addition, it is acknowledged that the Council are subject to a substantial housing land supply deficit.
- 6.4. Since the scheme entails the redevelopment of brownfield land and does not have a substantial impact upon the openness of the Green Belt, it forms appropriate development in the Green Belt.
- 6.5. In light of the NPPF's housing land supply requirement and on the basis that the Council must apply the standard method for calculating the housing requirement, the LPA is in a position of substantial 5 year housing land supply deficit. Consequently, development plan policies relating to spatial strategy, housing delivery and the countryside, including Core Strategy Policies CP1, CP11 & CP17 and MDD Policy CC02, are wholly out of date and must be granted reduced weight.
- 6.6. In such circumstances, the application will therefore be considered in line with paragraph 11 of the NPPF which states that where relevant policies are considered out of date, permission will be granted unless the application of policies in the Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed, or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

Having particular regard to key policies for directing development to sustainable local locations, making effective use of land and securing well-designed places. Whilst the site is within the Green Belt which is a footnote 7 exception, the tests pertaining to development of this brownfield site are passed and conclude that the proposed development is not inappropriate, such that footnote 7 is disengaged.

- 6.7. The application site, whilst being in the Green Belt, is located in the elongated cluster of commercial type uses located within Hare Hatch. It is visually contained by such uses and has been identified to be subject to only highly localised views. The supporting LVIA concludes that development of the site would be visually contained and would offer benefits in both landscape and visual respects.
- 6.8. The site in its current garden village land use is covered by buildings and hardstanding. Aside from the site's frontage, the land features virtually no trees. Consequently, there are existing built forms which are visually dominant in the wider landscape and limit the visibility through and across the site. The existing buildings also offer a very limited contribution to the public realm given they are in a dilapidated condition. Residential development will open up the site, by replacing the existing bulky buildings with smaller built forms, with space in between. This will increase the opportunities for visibility through and across the site, and whilst it will represent a change in the use and character of the site, will not be out of keeping given the surrounding uses. There will therefore be clear landscape and design benefits associated with the proposed redevelopment.
- 6.9. Paragraph 11 of the Framework states that proposals should only be refused if the adverse impacts would significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework taken as a whole. Decisions should also apply a presumption in favour of sustainable development, which can be achieved through three dimensions defined in Paragraph 8 as: economic, social and environmental.

- 6.10. The economic role of the NPPF requires proposals to contribute to building a strong, responsive and competitive economy. The proposal would encourage development and associated economic growth with future occupants undoubtedly contributing to the local economy and continued viability of local services in Hare Hatch and in the nearby village of Twyford / Ruscombe, such as the village hall, shops and public transport (bus and rail) services. In addition, the proposed location of the development would contribute towards meeting the housing need in a Borough with an acknowledged substantial housing land supply deficit and as such accords with the Government's objective of boosting the supply of housing.
- 6.11. The social role of the NPPF requires planning to support strong, vibrant and healthy communities and states that it should create a high quality built environment. The proposal provides an opportunity to contribute to the Borough's housing stock. Through offering a mix of housing types and sizes, a mixed community would be offering opportunities at different price points would be able to develop.
- 6.12. In terms of the environmental role, the NPPF requires that the natural, built and historic environment should be protected and enhanced and should mitigate against climate change. The proposal for residential use is considered to be compatible with the character of the surrounding area and will be well screened by existing vegetation. The potential for supplementary landscaping ensures that there is no detrimental impact to the landscape. The removal of the existing car park and infilling of the green frontage along the Bath Road will represent a noticeable improvement in respect to views from the Bath Road. The proposals offer a real opportunity for design and landscape betterment when compared to the existing site's poor contribution towards both considerations. The proposal is therefore not considered to have any adverse effect on the natural environment and will form a natural continuation to development already seen on this side of Bath Road. Both the drainage and ecology plans will enhance the environmental credentials of the site, retaining habitats and creating new ones.

- 6.13. Access is planned to be relocated from Bath Road as illustrated in the accompanying access plan by iTransport. The access proposals are predicated upon the results of speed surveys, as well as the projected occupation and associated vehicle movements at the site arising from the development.
- 6.14. Suitable car parking provision, including visitor spaces, is shown on the layout and will be accommodated at the appropriate standards within the detailed design proposals at reserved matters stage. Suitable cycle parking provision will also be included. As concluded by within the Transport Statement, the site is in a suitable location for residential development with regard to access to services, facilities and employment opportunities for future residents. There will be no 'severe' residual or cumulative traffic impact arising from the development proposals. The development proposal therefore meets local and national planning policy requirements, and there is no reason from a transport perspective for the planning application to be refused permission.
- 6.15. The site is located within flood zone 1 and is classified as being of low risk. The Flood Risk Assessment includes a drainage strategy for the site that has focussed on improving run-off rates and attenuating surface water flow through a comprehensive. The proposed SuDS system incorporates an attenuation pond incorporating a hydro break system limiting the flow of water into the neighbouring watercourse to a greenfield rate. This flow will be significantly lower than the current (uncontrolled) system. Consistent with the PPG, there is no requirement for a sequential test. The significant reduction in building footprint and hardstanding, as well as the increase in permeable surfaces and the control of the rate of run off into the ditch will enable an improvement in surface water management on the site.
- 6.16. The site itself is not of high environmental value. It comprises previously developed land and is well contained by existing landscaping that can be strengthened through the site's development. The provision of public open space will benefit both the existing and future residents of the area.

- 6.17. There is ample space for enhancement planting, both at the site boundaries and in the front and rear gardens of the proposed dwellings. This will combine to create a spacious and green character development, appropriate for its setting.
- 6.18. The proposed SuDS pond will also provide an opportunity for biodiversity enhancement as a wildlife pond. It is envisaged that an informal circular footpath around the pond and benches will be included. The inclusion of a children's play area will also provide further recreation opportunities and the chance for families to spend quality time together outdoors, within proximity to their homes.

Summary: Planning Balance

- 6.19. The earlier part of this section has confirmed that the scheme complies with the development management policies of the development plan. Further, it has been identified that the Council is in an accepted position of substantial housing land supply deficit when assessing the housing requirement using the standard method approach as required by the updated NPPF. The tilted balance is therefore engaged and the weight that should be attached to the benefits of providing housing is substantial.

Benefits of the Proposed Development

- 6.20. The merits and potential impacts of the application scheme are now assessed in relation to the three sustainability tests set out at paragraph 8 of the NPPF. Paragraph 8 of the NPPF states (amongst other things) that the assessment of the sustainability roles should not be undertaken in isolation, because they are mutually dependent. In accordance with the guidance at paragraph 8 of the NPPF, a combined analysis in relation to the sustainability role is set out below. The analysis is then summarised in tabulated form by breaking down the

individual components of economic, social and environmental matters to assist in the consideration of the overall planning balance.

Economic Considerations

6.21. The principal economic benefits, which are reinforced by the current economic challenges facing the country, are summarised below.

- 1) Increased house building in a Borough where there is a significant demand for new housing that in turn drives economic growth further and faster than any industry. In this regard the proposals will be contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is being made available in the right place in a site that is not remote and at the right time (to meet an acknowledged housing land supply deficit) to support growth.
- 2) Comprises a medium sized site whereby NPPF paragraph 73 states that such sites can make an important contribution to meeting the housing requirement of an area and are often built-out relatively quickly. This benefit is particularly beneficial at a time of acknowledged housing land supply deficit.
- 3) For the economy to function, sufficient housing is required in the right locations and at the right time. This site is brownfield land that is to be prioritised in meeting housing needs.
- 4) Create or support direct, indirect and induced jobs from the homes built on the site⁸.

⁸ See page 13 of the Homes Builders Federation “Economic Footprint of UK Housebuilding “ (July 2018)
- <https://www.hbf.co.uk/news/economic-footprint-uk-house-building-july-2018/>

- 5) Helping to deliver a significant boost to the local economy through 'first occupation' expenditure of up to £103,778⁹. This is expenditure on new furniture and other household goods that residents spend as 'one-offs' when moving into a new home.
 - 6) In terms of household expenditure, data from ONS Family Expenditure Survey 2022-23¹⁰ shows that the 'average UK household spend' is £526.10 per week (Table A33) (or £27,432 per year), whereas in South East England it is 16.4% higher than the UK average (Table A33). This means average weekly spend per household is £612.40 (or £31,932 per annum). For the application scheme, the total gross expenditure is estimated to be up to £606,708 annually to the economy. A proportion of this household expenditure is anticipated to be spent in local shops and services and will help sustain the existing services across Wokingham Borough, especially in Twyford and Wargrave. The expenditure will include that a proportion of that spent on areas including food & non-alcoholic drinks (£70.90 per week) (i.e. local convenience expenditure); alcoholic drinks (£12.90 per week); recreation and culture (£69.30 per week), household goods and services (£39.00) and miscellaneous goods and service i.e. hairdressing & beauty treatments (£47.00 per week).¹¹ Given the current economic challenges facing the UK these are significant economic benefits.
- 6.22. By providing land of the right type, in the right place, and at the right time to support economic growth, the development of 19 dwellings on the application site satisfies the objectives at paragraph 8 of the NPPF and assists in the aims of the NPPF in helping to build a strong and competitive economy (NPPF, paras 85-89).

⁹ Research carried out by OnePoll on behalf of Barratt Homes (August 2014; <https://www.barratthomes.co.uk/the-buying-process/home-buying-advice/>) indicates an average spend of £5,462 per dwelling.

¹⁰ [Family spending workbook 3: expenditure by region - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/physicalhealth/articles/familyspendingworkbook3expenditurebyregion).

¹¹ Figures based upon SE Regional data in Table A33

- 6.23. In accordance with the provisions at paragraph 81 of the NPPF, and in light of the housing land supply deficit, the temporary and more permanent economic benefits associated with the residential development, attract **moderate and significant weight** respectively in the planning balance.

Social Considerations

- 6.24. The principal benefits that arise from the proposal in respect of the **social role** relate to helping to support strong, vibrant and healthy communities, including high-quality housing required to meet identified needs in open market and affordable sectors. The benefits are:

- 1) The provision of 19 new homes in the Borough where there is an established need for such new homes, where the application of the standard method for the housing requirement and the Council's identified housing land supply indicates that current needs will not be addressed through the adopted Plan.
- 2) Meeting general housing needs is a benefit, consistent with the Government's objective of significantly boosting the supply of homes.
- 3) The increase in supply of new open market housing will improve affordability ratios, thereby improving the ability of the population to own their own home and enhance how society and the economy function.
- 4) The proposal can provide a range of housing types and sizes, and a mix that will enable a mixed community to develop.
- 5) The scheme would enable the delivery of high-quality residential accommodation in a landscaped setting with new public open space, an children's play area and over 10% BNG (increases of 16.02% for habitat units and 1,747.29% for hedgerow units).

- 6) The scheme offers an opportunity for enhanced design quality when compared to the present functional and dilapidated appearance of the existing buildings.
- 6.25. Overall, the social benefits of the scheme attract **substantial weight** in the overall planning balance.
- 6.26. In determining the weight to be attached to the contribution of the market housing, the Prime Minister's speech on Plan for Change: 5 December 2024 set out the plan for rebuilding Britain with 1.5 million new homes, to help achieve the 'base camp aspiration' of home ownership, to turn around housing starts and permissions – the lowest for a decade, with [housing] waiting lists – over seven million.
- 6.27. Owing to the five year housing land supply shortfall, substantial weight should be attached to the provision of new homes. The acute housing land shortfall position which the Council has found itself in reinforces the need for more homes in the Borough. Considering the above, substantial weight should be attached to the contribution of this scheme to the provision of housing given the pressing and evidenced need.
- 6.28. It should be noted also that, irrespective of the five year housing land supply deficit in Wokingham Borough, the policy objective of significantly boosting the supply of homes, as articulated explicitly in NPPF paragraph 61, does not cease to apply in the event of a supply of housing in excess of five years.¹² The Council is failing to even meet these minimum requirements.

¹² *Crundall Parish Council v SOSHCLG* [2019]CO/3900/2018 EWHC1211(Admin) paragraph 108

- 6.29. Overall, the social benefits of the scheme attract **substantial weight** in the overall planning balance. This is irrespective of a five year housing land supply position¹³.

Environmental Considerations

- 6.30. In terms of the environmental role, the scheme would deliver a high-quality residential environment, making the best use of an underutilised parcel of land in a manner commensurate and respectful to its setting and locality. The benefits are:

- 1) The provision of a well-designed, low to medium density residential development in keeping with the site's surroundings and providing a high quality layout.
- 2) Redevelopment of brownfield land, that is to be prioritised when meeting housing needs.
- 3) As identified in the LVIA, the site presently offers a poor landscape contribution by virtue of the spread of structures and hardstanding across the central part of the site. By comparison, the proposal will enable a much clearer site, with visibility and the opportunity for retention and enhancement of boundary vegetation and new planting across / within the site.
- 4) The site enables residential development in a sequentially preferable location when compared to alternatives such as protected national designations.

¹³ Appeal decisions: PP/E2530/W/17/3181823: Land at South side of Kettering Road, Stamford, Linc PE92JS (9 March 2018) paragraph 51; APP/R1038/W/17/3192255: Land at Deerlands Road, Wingerworth (19th November 2018) paragraph 53, and APP/K3415/A/2224354: Secretary of State's decision for land and buildings off Watery Lane, Curborough, Lichfield (13th February 2017) paragraph 53.

- 5) The restoration of a green landscape to the site and associated reductions in built volume, footprint and hardstanding.
- 6) The securing of a minimum 10% biodiversity net gain.
- 7) A comprehensive energy strategy that ensures the dwellings will be low in carbon and water usage.

6.31. Overall, the environmental benefits of the scheme attract **substantial weight** in the overall planning balance.

6.32. These sustainability considerations are summarised in the table below.

Economic Considerations	Weighting
Increased house building to meet needs and drive economic activity and growth	Significant
Direct and indirect jobs from homes being built on site	Significant
GVA per annum from construction phase	Significant
One off first occupation expenditure	Limited
Increased household expenditure	Limited
Social Considerations	
Meeting an established housing need	Significant
Providing new homes in an area that is failing to deliver a minimum five year housing land supply	Substantial
Delivering a housing scheme that is immediately available in the early part of a five year housing land supply period	Significant
Delivering new housing to improve affordability ratios in an area of high house prices	Significant
Improving the ability of the population to own their own home and enhance how society and the economy function	Significant
Significantly boosting the supply of new homes consistent with Government policy	Significant
Providing a range of housing types, sizes and mix in response to identified local needs	Significant
Environmental Considerations	
An improvement in the site's overall design quality.	Significant
An enhancement in the site's landscape and visual quality	Significant
Redevelopment of brownfield land	Significant
10% biodiversity net gain	Moderate
Low carbon and water usage	Limited

- 6.33. Overall, the proposal represents sustainable development. Further, it is consistent with many sections of the NPPF including chapter 5 that seeks the delivery of housing, section 12 that encourages high quality design and section 15 that encourages biodiversity gain and improvements to the quality of the landscape.
- 6.34. The existence of the five year housing land supply deficit is a significant material consideration that engages the tilted planning balance in the NPPF at paragraph 11(d). If there is any minor adverse impact relating to the development, it would be the loss of a small quantum of existing employment generation and the site's location within the countryside. In the context of a substantial housing land supply deficit, the engaged tilted balance and set against the various benefits of the scheme, such minor adverse impacts identified do not come close to significantly and demonstrably outweighing the benefits that arise from the proposed development, when assessed against the policies in the NPPF taken as a whole. In this regard the application scheme represents sustainable development such that planning permission should also be granted on this basis.

Summary: Principle of Development

- 6.35. The site, whilst in the Green Belt, is previously developed land as confirmed through the Council's planning history associated with its use as a garden village. It has an established land use which has historically generated vehicle and pedestrian movements to and from the site, activity and noise within the site and the movement of goods on and off the site. The scheme offers an equal (let alone substantial) impact on the openness of the Green Belt and therefore forms appropriate development, consistent with NPPF paragraph 154(g).
- 6.36. The site has been demonstrated to be a sustainable location, by virtue of its relative proximity to local services, facilities and employment opportunities, with regard given to NPPF paragraphs 110 and 115 which identifies that there will

be differences between urban and rural locations. Further, the removal of the existing use in itself well results in a reduction in overall non-car modes of travel.

- 6.37. The accompanying technical reports clearly demonstrate that there is no physical or technical reason why development of this site is not possible, with no issues relating to highways (access and traffic generation), flood risk (suitable management of surface and foul water proposed), ecology (habitats retained and above 10% on-site BNG proposed), landscape (site is well-contained and proposed development will open up views across and within the site), heritage (no harm) and sustainability and energy. In landscape respects, the existing functional and dilapidated appearance of the site, sprawling across its entirety can be replaced with a well designed and landscaped residential community that offers real positive landscape and design benefits. New public open space with a play area and wildlife pond will provide a focal point for the development and existing residents where there is currently no public access.
- 6.38. Finally, the scheme firmly complies with the matters that paragraph 11 in particular points the decision maker to consider. Namely, development in a sustainable location, an effective use of land whilst balancing the need for a character compliant density / design proposal and the provision of housing. When all of the scheme's benefits are considered against the NPPF as a whole, it is clear that the benefits of the scheme substantially outweigh the disbenefits let alone the opposite. The scheme can be supported accordingly.

7. SUMMARY AND CONCLUSION

- 7.1. Section 2 of this statement summarises the site's existing use, development and character. It also refers to the site's physical and visual self-contained nature surrounded by established residential development and the site's location as part an enclave of development at Hare Hatch. Finally, it summarises the site's planning history with reference to the Council's assessment of the most recent application.
- 7.2. Section 3 provides a summary of the proposed development that would enable 19 new residential dwellings of a low to medium density nature to be accommodated on the site, along with an integrated drainage strategy, public open space, the requisite amount of parking, and a significant amount of landscape planting.
- 7.3. Section 4 analyses the relevant planning policy context, with development of the site being pursued under paragraph 154(g) of the NPPF which allows redevelopment of previously developed land.
- 7.4. Section 5 sets out a summary of the technical reports and policy considerations prepared to understand the site constraints and inform the layout.
- 7.5. Section 6 includes details of the numerous planning benefits of the scheme, and how these fit in with the 3 sustainable development objectives articulated and promoted in para. 8 of the NPPF; economic, social and environmental. The comprehensive development proposed will contribute elements towards each of these objectives, introducing a new permanent use onto a developed site, the provision of 19 dwellings in Hare Hatch, alongside the creation of new multi-purpose on-site public open space with recreational, visual and ecological benefits. We conclude that the application of policies in the Framework do not provide a clear reason for refusing the development and the adverse impacts would not significantly and demonstrably outweigh the benefits of delivering 19 dwellings.

- 7.6. The Framework confirms that the purpose of the planning system is to contribute to the achievement of sustainable development. Achieving sustainable development means that the planning system has three overarching economic, social and environmental objectives, which are interdependent and need to be pursued in mutually supportive ways. In the absence of an up-to-date Development Plan, and insufficient housing land supply, this site provides an eminently suitable and deliverable opportunity for the delivery of 19 dwellings in a manner which respects the local character and land uses, and availability of a confirmed previously developed site. The development contributes sustainable development and there is a presumption in favour accordingly
