

DELEGATED OFFICER REPORT



**WOKINGHAM
BOROUGH COUNCIL**

Application Number:	260447
Site Address:	Twyford Orchards, Rolson House, London Road, Twyford, Wokingham, RG10 9HZ
Expiry Date:	29 May 2026
Site Visit Date:	20 March 2026
Proposal: Application to vary condition 2 of planning consent 232561 for the Full application for the proposed erection of two storey side extension to existing warehouse following demolition of the canopy roof structure and removal of storage containers. Condition 2 refers to Approved Details and variation is to allow change to extension dimensions and amended drainage strategy.	

PLANNING POLICY	
National Policy	National Planning Policy Framework (NPPF) National Planning Policy Guidance (NPPG)
Core Strategy (CS)	CP1 – Sustainable Development CP3 – General Principles for Development CP6 – Managing Travel Demand CP7 – Biodiversity CP9 – Scale and Location of Development Proposals CP11 – Proposals Outside Development Limits CP12 – Green Belt CP15 – Employment Development
MDD Local Plan (MDD)	CC01 – Presumption in Favour of Sustainable Development CC02 – Development Limits CC03 – Green Infrastructure, Trees and Landscaping CC04 – Sustainable Design and Construction CC06 – Noise CC07 – Parking CC09 – Development and Flood Risk CC10 – Sustainable Drainage TB01 – Development within the Green Belt TB21 – Landscape Character TB22 – Sites of Urban Landscape Value TB23 – Biodiversity and Development
Joint Minerals and Waste Plan (JMWP)	The JMWP does not apply to the scale of development proposed within the site's location.
Wokingham Borough Local Plan Update (LPU)	SS1 – Sustainable development principles SS2 – Spatial strategy and settlement hierarchy SS5 – Development in the countryside SS6 – Development in the Green Belt

(N.B. the LPU is deemed to overall hold limited weight at this time)	SS8 – Meeting our employment needs CE2 – Environmental standards for non-residential development C1 – Active and sustainable transport and accessibility C2 – Mitigation of transport impacts and highway safety and design C3 – Active travel C4 – Green and blue infrastructure and public rights of way C5 – Parking and electric vehicle charging ER2 – Employment uses outside of Core Employment Areas ER3 – Supporting the rural economy FD1 – Development and flood risk (from all sources) FD2 – Sustainable drainage NE1 – Biodiversity and geodiversity NE2 – Biodiversity net gain NE4 – Trees, woodland, hedges and hedgerows NE5 – Landscape and design DH1 – Place making and quality design DH2 – Safeguarding amenity
Other	Borough Design Guide Supplementary Planning Document CIL Guidance + 123 List Sustainable Design and Construction Supplementary Planning Document

PLANNING HISTORY

Application No.	Description	Decision & Date
232561	Full application for the proposed erection of two storey side extension to existing warehouse following demolition of the canopy roof structure and removal of storage containers.	Conditionally Approved – 25/01/2024
230628	Application for a certificate of existing lawful development for the erection of an open sided canopy roof structure and the permanent siting of shipping containers in connection with the existing warehouse building.	Approved – 06/06/2023
F/2006/9268	Proposed erection of 2no. statues at the entrance to the site.	Refused – 02/02/2007
T/1997/66071	Application for Temporary Permission for retractable covered unloading area/	Refused – 26/09/1997
37148	New warehouse	Conditionally Approved – 08/07/1991

CONSULTATION RESPONSES

Internal

WBC Environmental Health: No objection
WBC Drainage: No objection
WBC Highways: No objection

WBC Landscape and Trees: No objection subject to condition
WBC Ecology: No objection subject to condition
External
None consulted

REPRESENTATIONS	
Twyford Parish Council	No comment
Ward Member(s)	No comments received
Neighbours	1 comment received in support of the application, subject to the containers not returning onto the site. <i>Officer's Comment: Condition 7 of the original permission required the removal of the containers off the site, this will be reimposed to this permission.</i>

APPRAISAL
Site Description: The application site is a commercial warehouse building on the eastern side of London Road to the north-east of Twyford. The site was redeveloped in the early 1990s with the previous warehouse building replaced with the current unit which occupies a large footprint within the site. While outside of settlement limits the site is boarded by three dwellinghouses to the south and a caravan site (Twyford Orchards) to the north. To the east is open fields and woodland. Immediately to the south of the existing unit is a tall canopy/roof steel framed structure with rows of double stacked containers sited underneath and adjacent to this structure on an area used as a service yard. This development was regularised under the recent Lawful Development Certificate application (ref 230628). The site is occupied solely by Rolson Tools and is not sub-let to any other companies. Proposal: This application seeks to vary condition 2 of planning consent 232561. Condition 2 relates to the approved details and the proposed variation is to allow the substitution of drawings showing an increase in size of the approved side extension, and the substitution of an amended drainage strategy. The width of the proposed extension would increase by 16m from the approved 19.9m (approx.) to approximately 35.9m, resulting in an enlarged footprint of approximately 568.3sqm. No changes are proposed to the approved height or depth of the extension or its siting. A variation of the approved plans must not result in conflict with the original description of development, as confirmed in the recent Court of Appeal case <i>Finney v Welsh Ministers</i> 2019. The proposed amendments, regardless of any merits, must not be materially different to the original description and must be considered to relate with the operative part of development. In this case, while the proposed change to the size and footprint of the approved extension is significant, the proposed amendment would still appear as a two storey side extension to the existing commercial unit. The LPA is therefore satisfied in this instance that the proposed amendment would not conflict with

the operative part of development approved under the original application, and that the proposed amendments would not alter the description.

Principle of Development:

The National Planning Policy Framework has an underlying presumption in favour of sustainable development which is carried through to the local Development Plan. The Managing Development Delivery Local Plan Policy CC01 states that planning applications that accord with the policies in the Development Plan for Wokingham Borough will be approved without delay, unless material considerations indicate otherwise.

Development within the Green Belt & Countryside

The Government attaches great importance to Green Belts with national policies for the protection of Green Belt land covered by Chapter 13 of the NPPF. Paragraph 142 of the NPPF states that, "The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence".

Paragraph 153 of the NPPF states that, "Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances." When considering any planning application, LPAs must ensure that substantial weight is given to any harm to the Green Belt, including harm to its openness. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of its inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

Paragraph 154 of the NPPF states that development in the Green Belt is inappropriate unless one of eight exceptions apply, including:

c) "the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building";

g) "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."

The proposal relates to an extension of a building and therefore the proposal could fall under exception (c), subject to the development being of a not disproportionate addition over and above the size of the original building. The applicant has referred to exception (g) in the submitted Planning, Design and Access Statement as of relevance as the proposal would replace the existing roof structure and containers and be sited on previously developed land.

The principles of Paragraph 154 are reflected in Core Strategy policy CP12 and MDD Local Plan policy TB01. The NPPF does not define what can be considered a "disproportionate addition" in size. Policy TB01 defines a proportionate addition as one

that is 35% or less in volume compared to the original building, although this applies to residential extensions only it is still an appropriate comparative tool to assist in assessing harm to the Green Belt.

The approved extension was deemed to accord with exception c) as it was not a disproportionate addition over and above the size of the original building and would be marginally smaller in volume than the existing roof structure and containers it would replace. However, the proposed variation to widen the approved extension would result in a materially greater volume of built form. The applicant has submitted volume calculations for the existing and proposed development on site, the agreed calculations are summarised in the table below (all measurements are approximate):

Parameters	Original Building (1991 permission)	Existing roof structure and containers	Original Scheme (232561)	Proposed Varied Scheme
Approximate Volume (m3)	19200	4946	4935	9,160
Total (m3)	19200	24146	24135	28,360
% Increase over 1991 permission		25.8	25.7	47.7
% Increase over existing development			-0.5	17.5

As demonstrated above, the varied scheme would result in an addition which is approximately **47.7%** larger than in size over and above the original building, and **17.5%** larger than the existing development on the site. While the previously approved scheme was considered proportionate, the increased scale of the amended scheme materially alters that position. It is therefore considered that the proposed variation would result in a disproportionate addition over and above the size of the original building and therefore does not comply with paragraph 154(c) of the NPPF.

Notwithstanding the above, paragraph 154(g) of the NPPF provides that the partial or complete redevelopment of previously developed land (PDL) is not inappropriate provided that the proposal would not cause substantial harm to the openness of the Green Belt. In this case, partial redevelopment of previously developed land within the Green Belt may be regarded as not inappropriate development, subject to an assessment of its impact on openness. The failure to comply with paragraph 154(c) does not preclude the proposal from consideration under other exceptions within paragraph 154.

The redevelopment of previously developed land within the Green Belt is broadly a longstanding exception. However, the amendments made to the NPPF in December 2024 significantly raised the threshold of harm that can be tolerated, with the previous criteria: 'no greater impact on openness' removed and Local Planning Authorities now required to assess whether it would amount to 'substantial harm' to openness.

The NPPF defines previously developed land (PDL) as:

“Land which has been lawfully developed and is or was occupied by a permanent structure and any fixed surface infrastructure associated with it, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed). It also includes land comprising large areas of fixed surface infrastructure such as large areas of hardstanding which have been lawfully developed.”

In this case, the application site comprises an established warehouse and service yard with hardstanding and associated structures. The proposed extension would remain wholly sited on hardstanding and would not encroach development beyond the existing built envelope onto open countryside.

Upon a review of the site’s planning history and the submitted information, Officers are satisfied that the application site meets the definition of previously developed land. The proposal can therefore be assessed against paragraph 154(g) of the NPPF, which requires consideration of whether the development would give rise to substantial harm to the openness of the Green Belt.

Impact on Openness

MDD Local Plan policy TB01 states that development proposals will only be permitted where they maintain the openness of, and do not conflict with the purposes of including land in, the Green Belt. This is consistent with Section 13 of the NPPF. There is no definition of openness in the NPPF; however, in the Green Belt context it is generally held to refer to freedom from, or the absence of, development. Development does not necessarily need to be visible in order to harm the openness of the Green Belt.

In *Turner v SSCLG* [2016] EWCA Civ 466 it was established that the concept of ‘openness’ is capable of having both a spatial and visual dimension and that the decision maker should consider how the visual effect of the development would bear on whether the development would preserve the openness of the Green Belt. Furthermore, current Planning Practice Guidance sets out what factors can be taken into account when considering the impact on openness, including the visual impact of the proposal as well as its volume (Paragraph: 013 Reference ID: 64-013-20250225 Revision date: 27/02/2025).

In terms of the amended scheme’s spatial impact, while the proposal would not encroach onto the open countryside, the larger extension proposed would increase the overall footprint and volume of built development on the site and result in a less permeable mass compared to the existing roof structure and containers it would replace. This results in a degree of harm to the openness of the Green Belt, as there would be a reduction in undeveloped space and an increase in built form within this part of the site.

However, in terms of visual openness, the development would be read in the context of the established warehouse complex and would replace the sprawling, ad-hoc cluster of structures within the south-eastern part of the site. The extension would be physically attached to the existing warehouse and maintain the same height, massing and design approach. Indeed, the proposal would rationalise and consolidate the existing cluster

of structures, resulting in a more coherent built form when viewed within the context of the site.

Moreover, the site is already characterised by built development and hardstanding, and the current proposal would not result in a more prominent or isolated form of development in the wider landscape. The proposal would also not disrupt any potential view onto the open countryside to the east when viewed from public vantage points on London Road.

Overall, the proposal would result in an increase in the volume of built form on the site which gives rise to harm to the spatial openness of the Green Belt. However, that harm is considered to be limited due to the wholly previously developed character of the site, the containment of the development within the existing built envelope with no encroachment onto adjoining open countryside, and the consistent scale and form of the extension compared to the existing structures it would replace. When taken as a whole, it is therefore considered that the proposal would not give rise to substantial harm to the openness of the Green Belt.

Countryside Policies

As the site is outside of settlement limits, Core Strategy policy CP11 is also relevant which states that development will not normally be permitted unless it meets certain criteria. The amended scheme has been reconsidered against Policy CP11 and is not considered to materially alter the conclusions reached under the original permission.

The proposed extension would create considerable floorspace for storage and distribution and expand the existing provision of this commercial use on the site. The NPPF supports the expansion and increased variety of these types of existing businesses within the countryside and the proposal would therefore not conflict with Policy CP11(1).

The proposed extension would be sited immediately adjacent to the southern elevation of the original warehouse building, on existing hardstanding within the boundaries of the site, and would not encroach onto adjoining undeveloped land. Therefore, it would not be viewed as an isolated form of development nor expand development into the open countryside in accordance with Policy CP11(2). In respect of CP11(3), the proposal would replace existing structures and would bring about environmental improvements to the site. This was assessed in the Officer's Report for the original scheme and will be re-visited in this report where relevant.

Summary

While the amended scheme would represent a disproportionate addition relative to the size of the original building and therefore does not fall within paragraph 154(c) of the NPPF, the proposal constitutes the redevelopment of previously developed land for the purposes of paragraph 154(g).

As discussed, the increase in built form would result in some harm to the openness of the Green Belt. However, for the reasons set out above, that harm would not be

substantial. The proposal therefore falls within the scope of paragraph 154(g) of the NPPF and is not inappropriate development in Green Belt terms.

In accordance with footnote 55 to paragraph 153 of the NPPF, the proposal is not required to be justified by very special circumstances. Nevertheless, the identified limited harm to openness attracts weight and must be taken into account in the overall planning balance.

Landscape, Trees and Character of the Area:

Policy CP3 of the Core Strategy states that development must be appropriate in terms of its scale of activity, mass, layout, built form, height materials and character to the area in which it is located and must be of high-quality design without detriment to the amenities of adjoining land uses and occupiers.

MDD Local Plan Policy TB21 requires consideration of the Council's Landscape Character Assessment. Proposals must retain or enhance the condition, character and features that contribute to the landscape. Policy CC03 of the MDD Local Plan aims to protect green infrastructure networks, promote linkages between public open space and the countryside, retain existing trees and establish appropriate landscaping.

While the proposed variation would result in a larger extension in terms of its width, the development would still appear as a subservient addition to the original warehouse due to its generous set back from the principal building line. Its matching ridge height, dual pitched roof form and external materials will further mitigate its prominence from immediate viewpoints and ensure that it does not appear incongruous.

Wider views are partially mitigated by mature trees and hedges on and adjacent to the boundaries within this part of the site. An updated Arboricultural report (B.J. Unwin Forestry Consultancy, January 2026) has been submitted in support of this application which concludes that all existing vegetation will remain adequately retained and protected as part of the proposed development. The Council's Senior Landscape Officer has reviewed this information and raises no objection, subject to the recommended mitigation measures being secured by condition. The retention of the boundary treatment further ensures that the visual impact of the proposal would be sufficiently mitigated as well as according with MDD Local Plan policy CC03.

Overall, the amended scheme would introduce no adverse impact to the character of the area and the wider landscape over and above the original permission in accordance with Core Strategy policy CP3 and MDD Local Plan policies CC03 & TB21.

Neighbouring Amenity:

The wider extension proposed would result in a change of outlook for the neighbouring semi-detached dwellings to the west of the site, potentially creating a sense of enclosure for these adjoining occupiers. However, the amended scheme would retain a minimum separation distance of approximately 8m from the western boundary and 23m from both dwellings and remains an improvement from the existing arrangement with the containers sited in much closer proximity to the site's boundaries. The

intervening boundary planting would also break up the visual permeance of the extension, further mitigating the potential sense of enclosure.

Therefore, the proposal would not result in an adverse overbearing impact, while the retained separation distance would alleviate any potential overshadowing concerns. No fenestration is proposed on the part of the extension directly facing these neighbours preventing any potential overlooking impact.

The Council's Environmental Health Officer has reviewed the proposed variation and raises no objection, concluding that the amended scheme would not intensify the existing use of the site or give rise to any additional noise or disturbance impact. No objection is also raised to the amended external lighting scheme from an environmental health perspective.

Overall, the amended scheme would introduce no adverse impact to the amenity of neighbouring land users over and above the original permission in accordance with Core Strategy policy CP3.

Highway Access and Parking Provision:

Core Strategy policy CP6 concerns issues relating to highway safety and access, stating that planning permission will be granted for schemes that, amongst other requirements, provide appropriate vehicular parking, enhance road safety and do not cause highway problems. Policy CC07 and Appendix 2 of the MDD Local Plan set out the recommended minimum parking requirements for development proposals.

The proposed variation, with the exception of the realignment of some parking spaces, would not affect the site's existing parking provision which remains well in excess of the requirement for 29 spaces. The proposal would also not affect the approved swept path analysis, ensuring sufficient turning space within the site's boundaries. Subsequently, the Council's Highways Officer has raised no objection to the amended scheme.

Flooding and Drainage:

Policy CC09 of the MDD Local Plan requires consideration of flood risk from historic flooding and policy CC10 requires sustainable drainage methods and the minimisation of surface water flow.

The site is located within Flood Zone 1 and the proposal represents no additional flood risk or vulnerability from rivers. An amended Drainage Strategy Report (DGC Consulting Engineers, 23/02/2026) has been submitted in support of the application. The Council's Flood Risk & Drainage Officer has reviewed the proposal and raised no objection, concluding that the updated drainage strategy remains acceptable.

Ecology:

Paragraph 180 of the NPPF is clear that new development should contribute to and enhance the natural environment by minimising impact on and providing net gains for biodiversity. Policy TB23 of the MDD Local Plan requires the incorporation of new

biodiversity features, buffers between habitats and species of importance and integration with the wider green infrastructure network.

An updated External Lighting Scheme has been submitted in support of the application. The Council's Ecology Officer has reviewed the amended scheme and raised no objection, concluding that the larger extension would have no additional impact on ecological matters subject to the development being carried out in accordance with the lighting strategy. The relevant drawings will be included within the varied wording of condition 2 to secure compliance.

Other:

The proposed amendments does not impact any other material planning considerations relating to the approved development. In addition to the variation of condition 2 it is also recommended that condition 4 is varied to ensure that the proposed development is carried out in strict accordance with the updated Arboricultural Method Statement.

Conclusion:

While the proposed variation to widen the approved extension would amount to some harm to the spatial openness of the Green Belt, this would be limited due to the context of the site as an established warehouse and service yard, the development being contained within the existing built envelope and the visual improvement arising from the replacement of the existing cluster of structures within this part of the site. The proposal is therefore not considered to give rise to substantial harm to the openness of the Green Belt and falls within the scope of paragraph 154(g) of the NPPF. It is therefore not inappropriate development in Green Belt terms.

No harm to any other material planning considerations has been identified, and the proposal would continue to support an established commercial business within the site's rural setting. On balance, the amended scheme represents an appropriate outcome for the site. The application is therefore recommended for **approval**.

Community Infrastructure Levy (CIL): When planning permission is granted for a development that is CIL liable, the Council will issue a liability notice as soon as practicable after the day on which the planning permission first permits development. Completing the assumption of liability notice is a statutory requirement to be completed for all CIL liable applications.

The Public Sector Equality Duty (Equality Act 2010): In determining this application the Council is required to have due regard to its obligations under the Equality Act 2010. The key equalities protected characteristics include age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation. There is no indication or evidence (including from consultation on the application) that persons with protected characteristics as identified by the Act have or will have different needs, experiences, issues and priorities in relation to this particular planning application and there would be no significant adverse impacts as a result of the development.

RECOMMENDATION	
Conditions agreed:	Not required
Recommendation:	Approve
Date:	29 May 2026
Earliest date for decision:	31 March 2026

Recommendation agreed by: (Authorised Officer)	
Date:	29/05/26

PLANNING CONSTRAINTS/STATUS

Contaminated Land Consultation Zone

Bat Roost Habitat Suitability

Countryside

Green Belt

Great Crested Newt Consultation Zone

Ground Water Zones

Radon Affected Area

Landscape Character Assessment Area – Wargrave-Twyford Arable Chalk Lowlands

SSSI Impact Risk Zones

JCEB Mineral Safeguarding Areas