

App Reference: 253113

Date: 25 February 2026

Dear Sir/Madam,

Re: Clear View Cottage, Whistley Green, Hurst, Wokingham, RG10 0DU

I am writing to you on behalf of the applicant with regard to the application reference 253113 at Clear View Cottage, Whistley Green, Hurst, RG10 0DU, currently being considered by Wokingham Borough Council. The application seeks planning permission for:

Full application for the proposed erection of 1 no. detached dwelling following demolition of the existing dwelling, plus erection of a detached car port with first floor storage, a front wall and gate, associated landscaping and installation of PV panels on an existing outbuilding.

The purpose of this letter is to provide constructive comments relative to the 3rd party objections and internal consultation responses received by the Local Planning Authority (LPA) with regard to this application. These can be categorised into the following summary issues:

- Character and Appearance of Area
- Heritage Implications
- Residential Amenity
- Other planning considerations

Character and Appearance of Area

As set out in the submitted Planning Statement, the existing application site already provides a unique visual and spatial addition to the area, in terms of it being a significantly larger plot containing a varied mix of existing buildings. The content of various objections suggest that regard has not been taken into account of this situation. Particularly, comments suggest that the proposal's built form would be disproportionate to neighbouring buildings fail to take into account the existing disparity of plot size, and suggestions that something is not appropriate to the character of the area simply because it is larger would result in no development expansion at all in the planning system (which is completely contrary to its purpose).

By contrast, the NPPF's and Development Plan's very existence is to encourage sustainable development, which is implicit to development expansion. The development is highly sustainable through not only its locational positioning but also use of high quality materials, design, and constructional standard.

The application site and its surrounding area cannot be said to have maintained a historical and cohesive appearance given the presence of the Nursery Gardens housing development to the immediate east of the application site. This modern housing estate has essentially the equivalent influence to the setting of the dwelling, to the more historic dwellings to the east.

Objections have been raised regarding the appropriateness of a large 'manor-style' dwelling in this location, suggesting in cases that the countryside would be more appropriate. However, it is an unarguable position that the Development Plan directs development to the defined settlement in the first instance. By comparison, development in the countryside (and Green Belt) is far more restricted. There is no provision

within the NPPF or the Development Plan that suggests a large dwelling is inappropriate within defined settlement, and indeed logically a suburban location is the ideal position. Given this, and the provision in both national and local policy about providing a mix of dwellings (which includes executive, larger dwellings as there is a market demand), it is simply incorrect to suggest the defined settlement is not the appropriate setting.

Various objections submitted allege that the proposal would be disproportionate to the size of the plot. The overall site covers 0.5 hectares (1.2 acres), with the proposed dwelling occupying a footprint of 391 sqm. Even when considering the existing retained buildings and proposed car port, the resulting density of built form proportionate to the overall plot is in fact significantly lower than the majority of the surrounding residential properties.

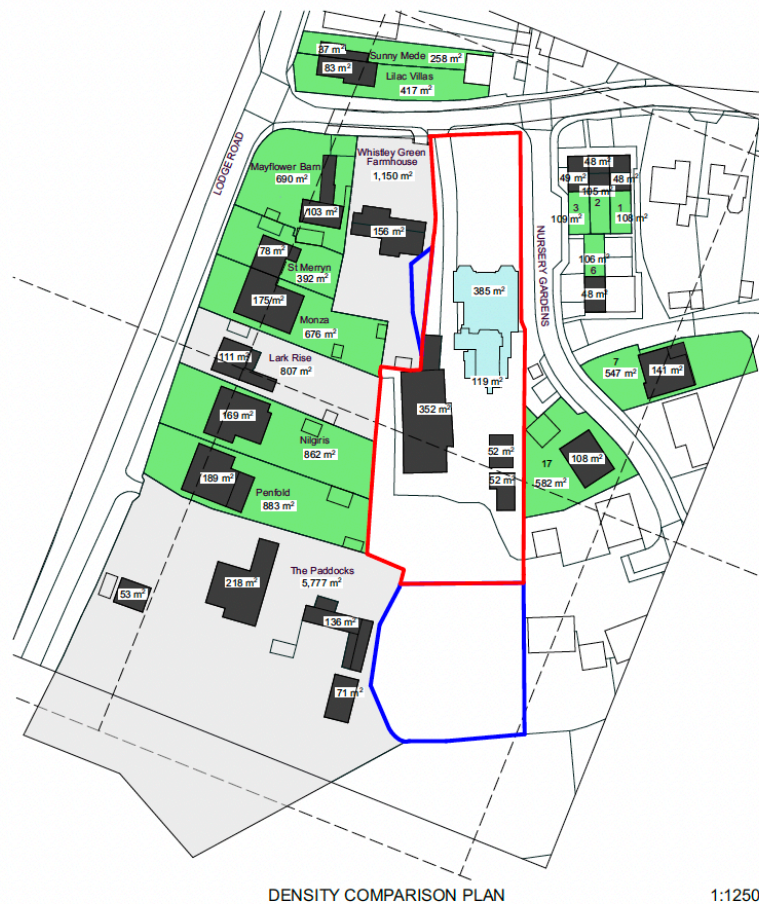
Appendix 1 provides a Density comparison study of the surrounding properties, by measuring the comparative plot sizes and footprints amongst the closest neighbouring residential properties. It finds that out of 15 surrounding properties examined, only 3 have a lower overall density compared to that of the proposal – and this includes both the existing and proposed (including retained) buildings on site.

Additionally, to supplement Appendix 1, Appendix 2 provides a table evidencing the ration of dwellings per hectare in respect of the same 15 neighbouring properties in comparison to the application site. Each of these dwellings contain a higher percentage ratio than that of both the existing and proposed dwellings. In order words, the proposal cannot be said to constitute overdevelopment in these terms.

Furthermore, Appendix 3 provides an additional visual aid in terms of a cross-sectional view (north to south) of the appearance of the proposal in the context of the existing buildings. The plan shows a clear set back of the

proposed dwelling well behind the building line of Whistley Green Farm House, and of a similar height to that of 1-3 Nursery Gardens, thereby avoiding a densely-packed or excessively bulky appearance.

Factually the proposal cannot be said to be disproportionate in this context, and it is plainly misleading to claim otherwise.



Extract from Appendix 1 illustrating comparative densities

By contrast, a significantly smaller dwelling within what is defined settlement, would not be said to be making an efficient use of land, and therefore would risk falling contrary to NPPF paragraph 129 along with the Development Plan which both seek to make optimal use of land, particularly involving brownfield and settlement. In other words, what objections are

seeking fundamentally risks resulting in a less policy-compliant development.

If the scheme remains unpopular, a reasonable alternative to this could be the redevelopment and provision of additional dwellings on the site. This is considering the site is within defined settlement and the Council is unable to demonstrate an adequate supply of housing, and also the clear example of neighbouring Nursery Gardens.

Heritage Implications

The Council have suggested that the property has eligibility as a non-designated heritage asset ('NDHA'). The justification for this is its identification within an Historic Environment Topic Paper (2024), which supports Wokingham's draft Local Plan, as an undesignated asset. The topic paper carries limited weight given it is a supporting evidence base document for a local plan that is yet to be adopted. It also goes without saying there is a difference between an NDHA and an undesignated asset, and this is explicitly differentiated within Appendix C of the topic paper.

The site is not included in any published adopted local list or Development Plan document.

It therefore appears that the judgement as to whether the property is an NDHA has come about from the application consideration itself. No proportionate explanation of significance has been issued to demonstrate the building meets the typical basis for NDHA consideration, and the onus is on the Council, not the applicant, to demonstrate this given its current status in the current Development Plan.

Historic England have published explicit and clear guidance on local heritage listing/listing of NDHAs, and the purpose of this guidance is also

to ensure consistency. In broad terms, the guidance sets out the following exercises are required:

- A selection criteria,
- an assessment that explains significance, and
- a clear record so that applicants and decision-makers understand what is being protected and why.

In other words, if the Council contends a building is an NDHA, it should be able to point to:

- the criteria applied,
- the evidence relied upon (age, fabric, architectural interest, historic associations, group value, townscape value, etc.), and
- a reasoned conclusion explaining what the significance is.

An NDHA is not a label that can be applied without evidence-led evaluation against transparent criteria.

It is not considered that the Conservation Officer's consultation response addresses any of the above in any sufficient detail. It is also highlighted by the fact the Officer admits they have not conducted any internal inspection – which is considered a significant part of such as process. Appendix 4 provides photographs demonstrating the interior has no real historical value. No judgement has also been provided by the Conservation Officer of the other buildings existing on site and their influence, nor to the influence of the modern Nursery Gardens development on the setting of the application site. The comments are therefore somewhat incomplete.

It is perverse, and a clear example of 'putting the cart before the horse', to suggest that the applicant has caused 'deliberate neglect of, or damage to, a heritage asset' (NPPF paragraph 209). As above, the property has not until this application been considered by the Council to be an NDHA, noting

also the topic paper was dated 2024. One cannot retroactively account for actions taking place before the property was deemed of heritage value, nor is there any evidence to suggest any deliberate action. The Council's claim here is therefore disappointing and illogical.

It is factually incorrect to state that the proposal would conflict with Policy TB26, because as above, the property is not an NDHA in the current Development Plan. Nor is the property located within the Area of Special Character. The Conservation Officer makes reference in their comments to the relationship of the property to Whistley Green Farm House, as do objection comments from Whistley Green Farm House. However, if this is the case, why was the application site explicitly placed outside the Area of Special Character on the Development Plan, when Whistley Green Farm House lies within it? This change in approach requires explanation from the Council in order to form a defensible position, with the Development Plan position carrying the greatest weight.

It is also somewhat disingenuous for objection comments from Whistley Green Farm House to suggest reference to a 2024 topic paper and the Area of Special Character were deliberately omitted by the applicant when the former carries minimal weight, and the site lies outside of said area.

Where a property is formally deemed to be an NDHA, NPPF paragraph 216 states that in weighing applications that directly (or non-directly) affect NDHAs, a balanced judgement is required having regard to the scale of any harm or loss (including in terms of the planning benefits, e.g. building sustainability improvements) and the significance of the heritage asset. As the significance of the heritage asset has not been adequately explained here (again the onus being on the Council given the property is not formally classified as an NDHA as it stands), it is unclear how the Council can attempt to apply NPPF paragraph 216.

Residential Amenity

Commentary has already been provided in the Planning Statement regarding the physical relationship of the proposal with the neighbouring dwellings, with the closest individual dwellings highlighted and examined. It is considered that the conclusions found within the Statement remain relevant in rebuttal to the objection comments.

There would not be any direct overlooking from windows of the proposed dwelling to any neighbouring properties. Whilst some oblique angles would result, the degree of angle combined with the separation distances would result in a relationship that remains typical of what is a built-up residential area within defined settlement. In other words, while it is acknowledged that there is a material change in relationship, this does not equate at all to that being materially harmful – a critical point. The same can be said of elements such as impacts to light levels.

Every development has an impact, and the purpose of the Planning system is to ensure such impacts are sustainably managed/progressed and do not amount to harm. Objection comments appear to be conflating these two separate aspects.

Other planning considerations

Regrettably, many objection comments contain factual inaccuracies, such as reference to development already present on site, as well as suggestions that the proposed car port would contain accommodation when it is explicitly shown in the planning submission it would not, as well as incorrect references to the height of the car port. Another comment suggests that bat and bird boxes are a visual intrusion to their amenity. These are highlighted for the Planning Case Officer to make their judgement on the weight to be given to these objections.

The proposal could not be said to result in highway safety harm or increased flood risk, in fact the proposals would offer overall drainage improvements through modern building standards, i.e. use of SuDS. Similarly the setting back the entrance gate would improve access arrangements in terms of both visibility splays and vehicles waiting to enter the site (where they can do so without encroaching onto the public highway). Matters of disruption during the construction process have long been established not to be materially relevant subject to appropriate construction management processes.

As already touched upon in the Heritage section above, the proposal is designed to be of significantly high energy efficiency and overall constructional sustainability. This is evidenced by the fact the dwelling is proposed to be of 'Passivhaus' standards in terms of energy consumption. Only a very limited number of dwellings in the entire Borough can be said to meet this level. The proposal therefore offers the opportunity to provide a landmark development to the area in terms of sustainability - a development the Council can champion.

Conclusion

It is not considered that the objection comments, or the comments from the Conservation Officer, provide evidence of the proposal resulting in material harm or an overall failure to comply with the Development Plan. The majority, if not all of the objections appear to be focusing on the fact that the proposal would have impacts, without considering whether these impacts are harmful, which is a critical distinction to make. All development results in an impact, but the purpose of the Planning system is to manage and prevent impacts that are harmful in a sustainable manner, and this application demonstrates that the proposal would be sustainable development, with no harmful impacts considered to occur.

The Conservation Officer has not adequately explained their reasoning for considering the property to be an NDHA when applying Historic England criteria, and their comments contradict the boundary of the Area of Special Character established in the Development Plan, where Whistley Green Farm House lies within this area, but the application site does not – and clearly there is a reason for this. Comments alleging the applicant has deliberately harmed a heritage asset are both nonsensical given the timeline at hand, and disappointing.

I trust the above is clear however if you require any further information regarding the above or this application in general please do not hesitate to contact me.

Yours Faithfully,

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