

Date: 17 June 2026
Application: 261143



**WOKINGHAM
BOROUGH COUNCIL**

Adam Gostling
HGH Consulting
12-13 Welbeck Street
London
W1G 8DX

Development Management &
Compliance

P.O. Box 157

Shute End, Wokingham

Berkshire, RG40 1BN

Tel: (0118) 974 6000

Minicom No: (0118) 974 6991

Pre-application Advice Response Letter

Application Number: 261143

Site Address: Land Adjacent to Merchiston, Blakes Lane, Wargrave,
RG10 9TA

Proposal: Pre-application advice for the proposed erection of 1no. dwelling with associated landscaping, access and ancillary works.

Dear Adam Gostling

Thank you for your request for planning advice which was validated on 11 May 2026. This letter will provide advice about your scheme and what you may need to do when submitting a planning application.

At this stage, we have not consulted anyone else about your scheme, such as neighbouring properties, but we would do so if a planning application is submitted. Before you submit a planning application, we recommend that you carry out your own public consultation and provide evidence of this through a Statement of Community Involvement.

We have provided a [frequently asked questions page](#) to answer some of the common queries about planning which will help explain the planning application process.

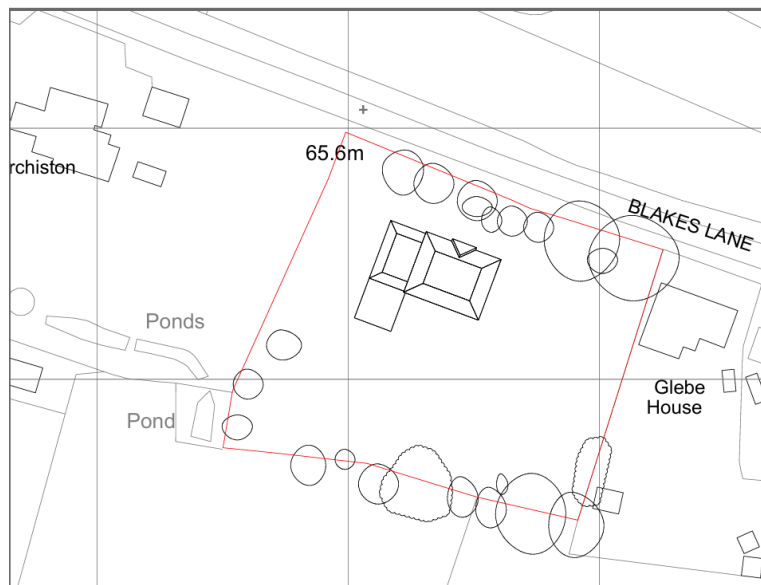
Site and Surroundings

The site is located in the countryside and metropolitan Green Belt, along a rural lane and mainly comprises of overgrown vegetation. Two (formerly three) dilapidated low key structures are located on the site which comprise of a small polytunnel; greenhouse and former shed. The buildings are in a poor state of repair. The site is adjacent to Blakes Lane with is rural lane with no street markings, pavements or street lighting. An open field is located on the opposite side of Blakes Lane. Mature trees are

located across the site.

Proposal and background information

Pre-application advice is sought for the demolition of existing buildings/ structures on site and erection of a single detached dwelling. Consequently there will also be a material change of use of the land from an agricultural to a residential (C3) use.



By way of background and as can be seen in the planning history section of this letter, part of the site is established, through a lawful development certificate, as storage associated with a nursery business (horticultural). The land that has this lawful use is outlined in red; the wider site is indicated in blue and not subject to that lawful use but was in use as a horticultural nursery. As a whole, the site has a lawful horticultural use which falls under an 'agricultural' use.



Two separate applications for a single detached dwelling have been applied for on the site in the past and were both refused and dismissed at appeal WBC refs. 170445 and 021752). The most recent appeal (for application 170445) was refused due to the fact the dwelling would be located in the Green Belt, outside of settlement limits, impact on the character of the area and impact on ecology/ biodiversity.

Planning Constraints

The following planning constraints have been identified in relation to the site:

- Green Belt
- Countryside
- Bat Roosting Area
- Mineral Safeguarding Area – Soft Sand
- Groundwater Consultation Zone
- Flood Zone 1
- Great Crested Newt Zone (Red)
- SSSI Impact Risk Zone
- Landscape Character Area
- Tree Protection Order (TPO-0214-1982)

Assessment of Proposal & Key Issues

Principle of Development:

The principle of development needs to be assessed against the adopted development plan and the NPPF. The adopted development plan in this location comprises of the Core Strategy, Managing Development Delivery Plan and the Joint Minerals and Waste Plan. Whilst not part of the local development plan, the NPPF is of high relevance, especially in light of the site's location in the Green Belt. The acceptability of the principle of the proposal will now be assessed in relation to the above.

a) Adopted Development Plan

- i) **Core Strategy, Managing Development Delivery Framework (MDD) (and NPPF)**

The National Planning Policy Framework has an underlying presumption in favour of sustainable development which is carried through to the local Development Plan. Policy CC01 of the MDD Local Plan 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.

The spatial strategy for the borough is contained within the Core Strategy. Policy CP9 of the Core Strategy - 'Scale and location of development proposals' - relates to the scale and location of development proposals and seeks to focus development proposals within those identified settlement limits. However, this site is located outside of settlement limits in the Metropolitan Green Belt and the Wokingham Countryside. As such, policies CP11 and CP12 apply which are discussed below in relation to these matters.

Green Belt

Policy CP12 of the Core Strategy states that 'planning permission will not be granted for inappropriate development within the Metropolitan Green Belt'. Policy TB01 of the MDD also discusses development in the Green Belt, but it is noted that the NPPF paragraph references are referred to are out of date. As such, the wording in the latest version of the NPPF (December, 2024) is considered most relevant and applicable to consider.

It is noted that previous schemes for a single dwelling have been refused due to being located outside of settlement limits, in the Green Belt, without justification. However, Officers are required to assess this proposal against the most up to date Green Belt policy and guidance, which has evolved since those previous decisions.

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 143 of the NPPF states that the Green Belt serves 5 purposes:

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

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.

Proposals are deemed inappropriate in the Green Belt unless the exceptions listed in paragraphs 153 and 154 apply. In this case, none of the exceptions would apply.

However, paragraph 155 goes on to state that “***The development of homes, commercial and other development in the Green Belt should also not be regarded as inappropriate where all the following apply*** (author’s emphasis):

- a. The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;*
- b. There is a demonstrable unmet need for the type of development proposed;*
- c. The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework and*
- d. Where applicable the development proposed meets the ‘Golden Rules’ requirements set out in paragraphs 156-157 below.*

As this scheme is for a residential development, compliance with a-d (above) will be essential to justify this scheme in the Green Belt. Taking a - d in turn, Officers make the following assessment:

a. The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;

Firstly, it needs to be established if the application site land constitutes as ‘grey belt’. The NPPF defines ‘grey belt’ as ‘*land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143.*’ As such, land can be classified as ‘grey belt’ if one of these apply. Now taking these in turn:

Is the site previously developed land?

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. Previously developed land excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.”

Within your supporting letter, you make reference to the planning history of the site and that there is a lawful use for the use of the land for storage associated with a nursery business (WBC application ref. 152003)

The certificate established that only part of the site had been used for storage associated as storage in connection with a nursery business (part of land indicated in red below):



The existing dilapidated buildings on the land are horticultural structures and comprise of a greenhouse and polytunnel. A nursery business is directly related to Horticulture which falls within the agricultural definition set out in section 336 of the Town and Country Planning Act (1990): “agriculture” includes horticulture, fruit growing, seed growing, dairy farming, the breeding and keeping of livestock (including any creature kept for the production of food, wool, skins or fur, or for the purpose of its use in the farming of land), the use of land as grazing land, meadow land, osier land, market gardens and nursery grounds, and the use of land for woodlands where that use is ancillary to the farming of land for other agricultural purposes, and “agricultural” shall be construed accordingly.

The definition of previously developed land in the NPPF excludes agricultural buildings:

*Previously developed land excludes: **land that is or was last occupied by agricultural or forestry buildings**; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.”*

As such, the structures do not constitute as previously developed land. The other parts of the site away from the structures are also previously undeveloped.

As such, as a whole, the site is not considered to constitute previously developed land and so cannot be considered grey belt land by virtue of it being previously developed land.

Any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143

Turning to whether the site constitutes as 'grey belt' land by virtue of it being land that does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143, an assessment against each of these is required. Parts (a), (b) and (d) are as follows:

- a) to check the unrestricted sprawl of large built-up areas;*
- b) to prevent neighbouring towns merging into one another;*
- d) to preserve the setting and special character of historic towns;*

With regards to (a), the application site is an infill site between established residential plots (to the east and west). To the south (rear) of the site, is open land. As a result of a single dwelling accommodating the relatively modest scale plot, it would not undermine the objective of preventing unrestricted sprawl.

With regards to (b), there are no towns within the Wokingham Green Belt and so the proposal would not result in neighbouring towns merging into one another.

In terms of (c), the setting and special character of historic towns would not be affected by the proposal, again given there are no towns within the Wokingham Green Belt.

As such, the land is considered to qualify as grey belt land given the land 'does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143'.

b. There is a demonstrable unmet need for the type of development proposed

There is an unmet need for housing development within Wokingham Borough. The borough currently has a 2.5 year housing land supply, with the requirement being a 5 year housing land supply. Upon any future application, an up to date position from the WBC Policy team would be needed regarding the 'need' for self build dwellings specifically. However, that aside, there is a demonstrable unmet need for housing generally.

c. The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework and

The Local Highway Authority were consulted on this application and made the following comments in relation to the site sustainability:

Distance to Local Amenities

Local services and amenities in Wargrave village centre are situated a 2.1km walk away, with a few shops on Victoria Road, which is approximately 1.3km away. Distances to these amenities exceed the acceptable distance to local services and facilities as outlined in the IHTs Guidelines for Providing Journeys on Foot. The nearest nursery is located approximately 870m south on foot. To access this, it would require walking along Tag Lane, which has no footway. Overall, the accessibility of the site to local amenities is not considered acceptable by the LHA.

Route Quality and Environment

Travelling in either direction from the proposed dwelling along Blakes Lane, there are no continuous walking and/or cycling routes. The route is also heavily wooded and there is no street lighting present. It is relevant to note that Blakes Lane has a national speed limit (60mph), which means it is dangerous for pedestrians to walk in the carriageway.

The wider surrounding road network is similar with a lack of pedestrian and cycle routes.

Public Transport Accessibility

The closest pair of bus stops are located west on Blakes Lane, which is circa 240m from the site access, which is within the maximum walking distance to a bus stop (400M). It is important to note that there are no safe walking/cycling routes to access these bus stops. These bus stops are served by the 127 route, which only operates five services per day on a Saturday. This route does not meet the 'good' standard required in WBC Local Development Framework. Furthermore, the waiting environment at the bus stops route may not be considered as safe and attractive to pedestrians / cyclists

Overall, the Local Highway Authority note the shortcomings of the site location in terms of sustainability and acknowledged that the site will heavily be dependent on car travel due to the minimal sustainable transport options available. However, due to the small-scale/single dwelling nature of this proposal the Local Highway Authority would not object on sustainability grounds.

Furthermore, the findings of the Inspector under application reference 170445 are useful in this respect as it was also concluded that the site was not deemed harmfully unsustainable for a single dwelling on the site:

“Although adjacent to a small number of other dwellings, the appeal site is located in a rural area, away from the nearest settlement such that it would be isolated. However, I understand the previous use may have attracted the comings and goings of up to 7 members of staff. Consequently, redevelopment to provide a single dwelling would result in less vehicle movements to and from the site than that previous use. Whilst it is unclear whether that level of movement could resume, it suggests that the proposed development would have less effect on the accessibility of the site than a resumption of the previous horticultural storage use.

For these reasons, I conclude that the location of the appeal site in terms of access to services and facilities would be acceptable, taking account of the previous use of the site. As such, the proposed development would not conflict with Policies CP1,

CP3 and CP6 of the CS and Policy CC01 of the MDD Local Plan insofar as they relate to the effect of the location of development in relation to transport infrastructure.”

As such, the development would not be resisted on the basis of paragraphs 110 and 115 of the Framework, based on the scheme being only for a single dwelling. It should be noted that the Local Highway Authority would likely object on site sustainability grounds if more than one dwelling were to be proposed on this site.

d. Where applicable the development proposed meets the ‘Golden Rules’ requirements set out in paragraphs 156-157 below.

The Golden Rules are not applicable to this scheme; those are only relevant to major residential schemes in the Green Belt, which this is not.

In summary, as the site complies with (a) – (d) of paragraph 155 of the NPPF, a single residential dwelling on this site within the Green Belt land is not regarded as ‘inappropriate’ by definition. As such, the proposal for a single dwelling on the site is acceptable in principle in relation to the Green Belt, and as such would also accord with local policies TB01 and CP12.

Countryside

As well as being located within the Green Belt, and the development not being ‘inappropriate’ in within the Green Belt, the site is also located within the Wokingham countryside. As such, policy CP11 of the Core Strategy applies. This states that in order to protect the separate identity of settlements and maintain the quality of the environment, proposals outside of development limits will not normally be permitted except where:

- 1) It contributes to diverse and sustainable rural enterprises within the borough, or in the case of other countryside based enterprises and activities, it contributes and/or promotes recreation in, and enjoyment of, the countryside; and*
- 2) It does not lead to excessive encroachment or expansion of development away from the original buildings; and*
- 3) It is contained within suitably located buildings which are appropriate for conversion, or in the case of replacement buildings would bring about environmental improvement; or*
- 4) In the case of residential extensions, does not result in inappropriate increases in the scale, form or footprint of the original building;*
- 5) In the case of replacement dwellings the proposal must:*
 - i) Bring about environmental improvements; or*
 - ii) Not result in inappropriate increases in the scale, form or footprint of the original building*
- 6) Essential community facilities cannot be accommodated within development limits or through the re-use/replacement of an existing building;*
- 7) Affordable housing on rural exception sites in line with CP9.*

The proposal does not meet any of the above exceptions. However, whilst a development may not meet the specified exceptions outlined in CP11, this does not

automatically mean that the development will undermine the intent of the policy. Attention therefore has to turn to whether the proposal conflicts with the overarching aims of CP11.

The overarching aims of policy CP11 are to prevent settlement coalescence and to maintain the quality of the environment. Due to the modest scale of the development and distances from nearby settlements, the development would not result in settlement coalescence. In terms of maintaining the quality of the environment, a multi-dimensional assessment is required and interlinks with other material considerations that will be discussed in this report and any future application would have to robustly justify the proposal in the countryside context in relation to this overarching aim in particular.

iii) Joint Minerals and Waste Plan

The Joint Minerals and Waste Plan identifies site allocations and extensions to help provide a future supply of sand and gravel extraction. However, despite these allocations, there remains a shortfall of supply during the plan period. The policy response to address the shortfall is the identification of a 'Minerals Safeguarding Area' (MSA), where Policy M2 of the plan applies, and also an 'Area of Search' where Policy M4 applies. This approach is to demonstrate the potential for, in effect, windfall provision within the Plan area.

The site is located within a Mineral Safeguarding Area for soft sand. However, policy M2 of the plan (para 6.40) notes that a minimum plot size of 3 hectares will apply. Sites below this size threshold can be assumed to be uneconomic.

As this plot size is below the 3 hectare threshold, minerals are not considered to be a constraint to development or the development sterilising these natural resources.

b) Local Plan Update (LPU)

Work is underway on a new local plan for the Borough - the Local Plan Update – which will put in place a new planning strategy for the period to 2040. Once adopted, it will replace the current Core Strategy and Managing Development Delivery local plans. The LPU is at Part 2 Hearings and currently under consideration by the Inspector. As a whole, the LPU is still given limited weight, despite its advance stage of preparation. This is owing to unresolved objections to a great number of the policies contained within it. It is noted that the pre-application site is not a proposed allocated site for future residential development in the LPU.

c) National Planning Policy Framework (NPPF) and Housing Land Supply

Paragraph 84 of the NPPF seeks to avoid new isolated homes in the countryside unless there are special circumstances such as a rural worker's dwelling, optimal viable use of a heritage asset, reuse of redundant or disused buildings, and subdivision of an existing building or if the building is of exceptional design. The site is located in the vicinity of other residential dwellings. As such, the proposal will not result in an isolated new dwelling and will comply with paragraph 84 of the NPPF.

In terms of housing land supply, the Borough is currently unable to demonstrate the required 5 year housing land supply as directed by the NPPF. This has been referred to earlier in this letter. The borough's current land supply is 2.5 years (requirement is a 5 year supply). As a result, the current Local Plan is 'out of date' and therefore the tilted balance (as outlined in paragraph 11(d) of the NPPF) is engaged. When the tilted balance is engaged, there is a presumption in favour of granting sustainable development unless *"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 combination"*

As such, there is a presumption in favour of sustainable development, with the development requiring additional housing in the borough.

d) Loss of existing land use

The existing use of the pre-application site is agricultural and previously has been in connection with horticultural business. As such, the site was likely a place of employment, albeit not in a designated employment area.

Any future application should make clear when the nursery business on the site ceased and justification for the loss of employment land. However, it is noted that loss of employment land was not raised as a barrier to the site's re-development under previous applications to repurpose the site for residential use.

e) Summary on principle of development

The proposed application site is located out of defined settlements, in both the metropolitan Green Belt and the Wokingham countryside and thus is contrary to the spatial strategy of the borough.

However, from the above assessment, the proposal is not considered 'inappropriate' development in the Green Belt by definition in light of paragraph 155 of the NPPF.

Notwithstanding this, in countryside terms, the proposal fails to comply with any of the specified exceptions as outlined in policy CP11. As such, any future application would have to robustly justify a dwelling in this location, taking into account the overall aims of policy CP11.

As the borough has a present shortfall of housing, the 'tilted balance' is engaged when assessing applications meaning that development should be granted unless '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'.

Design/ Character/ Impact on the Landscape:

Policy CP3 of the Core Strategy states that development must be appropriate in terms of its scale, mass, layout, built form, height and character of the area and must be of high-quality design. R1 of the Borough Design Guide SPD requires that development

contribute positively towards and be compatible with the historic or underlying character and quality of the local area. Sections 8.1 and 8.2 of the Borough Design Guide SPD also give specific direction on new development within the countryside.

Policy TB21 of the MDD states that proposals must demonstrate how they have addressed the requirements of the Council's Landscape Character Assessment, including the landscape quality; landscape strategy; landscape sensitivity and key issues. They should also retain or enhance the condition, character and features that contribute to the landscape.

Impact on the landscape/ designations

The site sits within the Bowsey Hill Valued Landscape proposed under the LPU and paragraph 187(a) of the NPPF therefore applies:

Planning policies and decisions should contribute to and enhance the natural and local environment by: a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);

Key points of the Bowsey Hill valued Landscape related to this Site and which the Tree and Landscape Officer would want to see preserved/enhanced include under the Representativeness section:

"The area is predominantly rural with low density development and with high density woodland. ... The high density of broadleaved woodlands in this valued landscape are important for: visual amenity; long distance views into, and framed views out of, the landscape; enclosed space for recreation; and as woodland habitats. The density of ancient woodland coppice sites in the core around Bowsey Hill makes this landscape particularly representative of traditionally managed lowland ancient woodland wooded landscapes." (p. 89)

The site is also in the Hare Hatch Farmed Chalk Slopes Landscape Character of the Wokingham Borough Council Landscape Character Assessment (2019). This landscape character is described as: *"A gently sloping landform supporting a farmed landscape with an intimate mosaic of arable fields and pasture interspersed with small woodland blocks. There is a dispersed settlement pattern of rural hamlets, scattered farmsteads and large manor houses." (p. 162)*

The settlement pattern is of: *"small linear village and hamlets which align roads ... connected by a network of leafy rural lanes crossing the landscape."* A detached dwelling on this site would be in keeping with this key characteristic as long as the existing woodland were maintained and enhanced given the "strong sense of enclosure created by ... the scattered woodland blocks," another key characteristic.

Impact on the character of the area

Except for neighbouring properties, views into the site are limited or filtered due to the vegetated boundary screening, reducing the sensitivity of the site this site. The site is also seen as an infill plot.

Within the appeal decision for application 170445, for a new dwelling on the site, paragraphs 11-13 discuss the impact of the proposal on the character of the area. They read:

11. The proposal would replace those buildings with a timber and stone building with zinc or equivalent low pitched roof with tiled ridge and detached timber garage with clay tiled roof with steeper pitch. The eclectic choice of materials and design of the two buildings do not reflect surrounding dwellings and would appear incongruous in this location.

12. The outside horticultural storage use of the hardstanding would be replaced by garden area that would contain domestic paraphernalia. This, combined with the proposed dwelling, would result in a domestic appearance to the development that contrasts with the existing appearance of the site and surrounding rural area.

13. For these reasons, I conclude that the proposed development would harm the character and appearance of the surrounding area. As such, it would conflict with Policies CP1, CP3 and CP11 of the CS and Policy CC01 of the MDD Local Plan that seek to maintain the quality of the environment and not have a detrimental impact on the countryside.

There are contrasts between this pre-application scheme and the refusal. Most notably the proposed materials of the refused scheme appeared out of keeping and a garage was proposed alongside the main house resulting in numerous buildings on the site. The latter is not the case here. In terms of materials, Full details on proposed materials would be required at application stage, although from the proposed visual depiction of the dwelling, these would appear suitably traditional with pleasant window forms and brick detailing. These would appear more appropriate than those under the refused scheme.

With regards to para 12 of the Inspector's decision, it is too here the case that as a result of the proposal, the site would have a more domestic appearance compared to its current state. At this stage, Officers would not consider this point alone to be grounds to resist a future proposal especially in light of the site having existing residential development adjacent to it to the east and west.

Detailed design and access

In terms of detailed design, the proposed dwelling would be of a sizeable scale in terms of width. However, it is noted that dwellings in the vicinity are also of a large scale, and so this proposal would not appear out of keeping in that sense. The dwelling would also be suitably positioned within the plot, leaving space on all boundaries.

Vehicular access to the dwelling would be from the existing access point where there is a deteriorating hardstanding area / driveway at the northwest corner of the Site and Blakes Lane, related to the former plant nursery business. Any proposed vehicular entry sequence should make use of this existing entrance and compacted area and so that visually, the site would not make new incursions into the tree lined road which

contributes positively to the quality and visual appearance of the wider countryside and Green Belt.

Public Open Space:

Policy TB08 of the MDD states that proposals for residential development will need to demonstrate how they meet the standards set out below.

Type~	Standards (ha per 1,000 population)
Parks and public gardens	1.1
Natural/semi natural green space (excluding Country Parks*)	2.84
Amenity greenspace	0.98
Provision for children young people (Neighbourhood Equipped Areas of Play; Local Equipped Areas of Play; Local Areas of Play)	0.25
Civic Space	0.01
Outdoor sports facilities	1.66
Cemeteries/Burial Grounds#	14.4 plots per 1,000 population

As this scheme is for a single dwelling, no public open space on site is expected. As such, the development would be expected to contribute by way of a financial contribution towards the provision of new/ existing areas of public open space in the borough. The exact contribution would be calculated by WBC Green Infrastructure at application stage. Financial contributions are secured by way of a s106 legal agreement.

Neighbouring Amenity:

Future occupiers of proposed dwelling

Standard and size of accommodation

Policy R17 of the Borough Design Guide outlines the internal space standards for different sized residential dwellings. Any future application should ensure these minimum standards should be met. Although no floor plans have been provided, from the visual image of the proposed dwelling, it would highly indicate there would be more than sufficient internal space to comply with these minimum standards. All habitable rooms should be served by a window for both the purposes of natural light and outlook.

Amenity Space

Policy R16 of the Borough Design Guide SPD advises a minimum depth of 11m for rear gardens and a 1m setback from the site boundary to allow access thereto. It should receive direct sunlight and be capable of accommodating play, clothes drying and storage.

From the proposed site plan, the rear garden would measure a depth of exceeding this minimum.

Existing occupiers

Policy CP3 of the Core Strategy states that development should not have an adverse impact on neighbouring properties.

Policy R16 of the Borough Design Guide outlines the separation distances required to maintain privacy and limit sense of enclosure.

R15 of the Borough Design Guide SPD requires the retention of reasonable levels of visual privacy to habitable rooms, with separation of 22-30m to the rear and 10-15m to the street. R23 notes that the side walls must not contain windows, especially at first floor level.

R18 of the Borough Design Guide SPD aims to protect sunlight and daylight to existing properties, with no material impact on levels of daylight in the habitable rooms of adjoining properties. It also requires sufficient sunlight and daylight to new properties, with dwellings afforded a reasonable outlook, preferably dual aspect (with the avoidance of north facing, single aspect flats) and no material impact on levels of daylight in the habitable rooms of adjoining properties. Habitable windows of adjoining properties must not be obstructed by a 25-degree angle and two storey extensions must not obstruct a 45-degree line back towards a habitable window of the adjoining property.

The neighbouring properties that are considered to most likely to be affected by the proposal are those to the east and west. Those are 'Glebe House' and 'Merchiston' respectively. From the proposed site plan, there would be more than sufficient separation distance between the proposed dwelling and windows of these neighbouring properties. There would also be sufficient separation distance between the proposed dwellings and the site boundaries, meaning the rear gardens of these neighbouring properties will also not be substantially adversely affected in terms of overbearing or loss of light impacts. However, any proposed side windows should still be carefully considered or omitted so as to not result in a loss of privacy from views into neighbouring plots/ their gardens.

Environmental Health:

Policy CP1(8) of the Core Strategy states that development should avoid areas where pollution (including noise) may impact upon the amenity of future occupiers. Policy CC06 of the MDD states that proposals must demonstrate how they have addressed noise impacts to protect noise sensitive receptors (both existing and proposed). An example of a noise sensitive receptor is a dwelling.

The site is not located on potentially contaminated land or exposed to unusual or detrimental noise receptors. Accordingly, WBC Environmental Health Officers did not raise concern with the proposal.

Highways:

Policy CC07 and Appendix 2 of the MDD Local Plan stipulates minimum off street parking standards. Policy CP6 of the Core Strategy states that development should not lead to highway problems and should encourage sustainable forms of transport to allow for choice.

Policy CC04 of the MDD Local Plan requires adequate internal and external storage for the segregation of waste and recycling as well as provision for green waste and composting and an appropriate area for ease of collection.

The proposal has been reviewed by WBC Highways who make the following comments, in addition to those made earlier in this letter with regards to site sustainability.

Traffic Impacts

The provision of one dwelling is unlikely to have a significant impact on the local highway network.

Access

As indicated in the layout plan for the proposed dwelling, an access would be provided off Blakes Lane.

If gates are to be provided for the access, they are required to be set back at least 5m from the edge of the carriageway and the gates would need to open inwards (away from Blakes Lane). This is to avoid vehicles obstructing the carriageway whilst gates are opening and would need to be illustrated on a plan.

Because a new access is to be provided, visibility splays of 215m x 2.4m would be required in accordance with Design Manual for Roads and Bridges CD109 (60mph). Alternatively, the applicant could conduct speed surveys and use the 85th percentile speed to inform the visibility splays, provided full speed survey results are attached.

The applicant will be required to consult with utility operators in regard to the movement of the telegraph pole. Visibility constraints due to vegetation would also need to be taken into consideration.

The applicant would need to demonstrate that the furthest point of the proposed dwelling is within 40m of the public highway, to ensure adequate fire tender access. If the furthest point of the proposed dwelling were to exceed 40m, the applicant would be required to demonstrate the access and egress of a fire tender vehicle in the forward gear.

Full details of the access arrangement would be required at application submission.

Parking

The applicant would be required to set out the proposed parking arrangement at application submission. WBC assess car parking requirements based on habitable rooms.

The applicant has not indicated the number of habitable rooms in the proposed dwelling, so exact parking requirements are unknown at this stage. In general, for a single dwelling, 2 spaces are required for up to 7 habitable rooms and 3 spaces for 7+ habitable rooms. Each parking space shall have minimum dimensions of 5.0m x 2.5m.

At application stage, a plan clearly showing the proposed parking layout with adequate space for manoeuvre would be required. Highways would welcome access and egress to be undertaken in the forward gear and for this to be demonstrated on the plan also.

EV Charging

The applicant would be expected to provide one active EV Charging Point as per Building Regulations (Approved Document S). An application should indicate the EV Charging Point on a plan. The NPPF also requires applications to make provision for Electric Vehicle charging within new developments.

Cycle Parking

Cycle parking would need to be provided in line with WBC standards. The applicant would need to provide cycle parking either through an access to the rear garden of the proposed dwelling or through the provision of a garage or dedicated cycle store. A layout plan illustrating this would need to be submitted within the full application.

If a cycle store were to be provided, space for 2 cycles is required for a dwelling with 4-5 habitable rooms, and 3 cycles for a dwelling with 6+ habitable rooms.

Refuse Collection Strategy

According to Manual for Streets, the maximum carrying distances for households (30m) and refuse collection operators (25m) from the collection point.

The applicant should illustrate a bin store on a plan, indicating how far it is from the collection point for the collection vehicle.

Trees and Landscaping:

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.

R14 of the Borough Design Guide SPD requires well-designed hard and soft landscaping that complements housing.

The site contains a line of protected mature trees along its northern perimeter with Blakes Lane and further north, is a mix of woodland, open pasture, ponds and arable fields. There are seven mature trees protected by TPO-0214-1982 and include:

- T1 – Oak (*Quercus robur*)
- T2 – Oak (*Quercus robur*)
- T3 – Lime (*Tilia*)
- T4 – Lime (*Tilia*)
- T5 – Oak (*Quercus robur*)
- T6 – Oak (*Quercus robur*)
- T7 – Oak (*Quercus robur*)



TPO trees indicated by red circles

According to the Woodland Trust Ancient Tree Inventory, two of the protected Pedunculate Oaks (*Quercus robur*) along the rear / southern boundary of the Site are veteran trees with substantial girths (#66271 and #66273). The Inventory also includes a “notable” Hazel tree (#66272). The Tree Officer believes T6 and T7 are the veteran trees on site, but this will need to be confirmed. Buffer zones are required around veteran trees. The buffer zone’s purpose is to protect ancient woodland and individual ancient or veteran trees. A buffer zone around an ancient or veteran tree should be at least 15 times larger than the diameter of the tree. The buffer zone should be 5m from the edge of the tree’s canopy if that area is larger than 15 times the tree’s diameter. The buffer zone delineation should be included within a Landscape Plan, if an application is submitted. Built form, including hardstanding are inappropriate within buffer zones and should be avoided as habitat could be harmed by trampling. Sustainable drainage schemes should also be avoided in the zones.

When considering ancient and veteran trees it should be noted that they are a material consideration in planning and the National Planning Policy Framework (NPPF 2024) states that they are ‘irreplaceable habitat’ and their protection is afforded substantial weight under paragraph 193 of the NPPF. It is important that all applicants are properly advised by an arboricultural consultant who has sound knowledge and experience of ancient and veteran trees and planning.

On site, the principle of tree pruning was discussed. Any future application would have to clearly outline the pruning required, which can then be commented upon.

Details of proposed landscaping (which should be high quality including native species) across the site would also be required in accordance with policy CC03.

Ecology:

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.

Protected species

The site is recorded as being in a potential bat roosting area. As such, a preliminary bat roosting survey would need to be carried out given the proposal will involve demolition of the existing structures on site. A bat emergence survey may also be required, depending on the findings.

The site is also located in a red zone for Great Crested Newts. This zone indicates area with key newt populations and contain significant habitats for the species, which are critical for their survival. As such, a wider ecological appraisal should be carried out to demonstrate that the development would not result in adverse harm to other protected species (including Great Crested Newts) that may be using the site, given it currently contains limited built form and given it has contained lots of vegetation.

Biodiversity Net Gain

Biodiversity Net Gain is mandatory for major and minor planning applications unless the development meets the exception criteria set out in [paragraph 17 of Schedule 7A of the Town and Country Planning Act 1990](#) the [Biodiversity Gain Requirements \(Exemptions\) Regulations 2024](#), and [The Environment Act 2021 \(Commencement No. 8 and Transitional Provisions\) Regulations 2024](#). In the event planning permission is granted, and the exceptions do not apply, paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990 grants permission subject to the condition “(the biodiversity gain condition)” and that development may not begin unless:

- a) a Biodiversity Gain Plan has been submitted to the planning authority, and
- b) the planning authority has approved the plan.

Flooding and Drainage:

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

The site is located in flood zone 1 which is the zone where there is deemed to be a low probability of flooding. As such, a flood risk assessment is only required if the site area is above 1 hectare.

In addition, the WBC Drainage Officer has also reviewed the proposal and advised that they would expect to see a drainage strategy as part of any application which should incorporate the following:

- 1) Calculations indicating the Greenfield runoff rate from the site
- 2) BRE 365 test results demonstrating whether infiltration is achievable or not
- 3) Use of SuDS following the SuDS hierarchy, preferably infiltration
- 4) Full calculations demonstrating the performance of soakaways or capacity of attenuation features to cater for 1 in 100-year flood event with a 40% allowance for climate change and runoff controlled at Greenfield rates, or preferably better
- 5) If connection to an existing surface water sewer is proposed, we need to understand why other methods of the SuDS hierarchy cannot be implemented and see confirmation from the utilities supplier that their system has got capacity and the connection is acceptable
- 6) Groundwater monitoring confirming seasonal high groundwater levels in the area
- 7) A drainage strategy plan indicating the location and sizing of SuDS features, with the base of any SuDS features located at least 1m above the seasonal high water table level
- 8) Details demonstrating how any SuDS for this development would be managed throughout the lifespan of the development and who will be responsible for maintenance

Building Sustainability:

Policy CC04 outlines that in respect of new homes, the follow should be achieved:

- a) *Seeking to achieve the requirements of the full Code for Sustainable Homes Level 4;*
- b) *Meet internal potable water consumption targets of 105 litres or less per person per day (as part of the requirement to meet full Code for Sustainable Homes Level 4).*

It should be noted that the above policy is out of date and were written before the Council's declared Climate Emergency. For this reason, the Council produced a Climate Change Interim Policy Position Statement (CCIPPS) (2022) which outlines what is expected of development proposals in light of the climate emergency.

In relation to policy requirements outlined in CC04, it should be noted that the Code for Sustainable Homes Level 4 has now been withdrawn, and now applicants must meet the interim Future Homes Standard (as required by Building Regulations) of a minimum 31% reduction in emissions, in line with the CCIPPS. This would be secured via a planning condition under any future application.

With regards to water consumption, measures for internal water use for each dwelling at a standard of less than 105 litres per person per day is required because Wokingham Borough is situated within part of the country classified as an area of serious water stress. This would be secured via a planning condition under any future application.

Planning balance and conclusion

In summary, the most important policies for determining the application are out of date by virtue of the absence of a 5 year housing land supply. Paragraph 11(d)(ii) of the Framework (the 'tilted balance') therefore states that permission should be granted unless any adverse impacts of granting permission would need to 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.

Paragraph 8 of the NPPF outlines that achieving sustainable development means that the planning system has three overarching objectives: social, economic and environmental.

There would be several social and economic benefits of the scheme; namely the provision of providing a new dwelling and the residents of the dwelling contributing towards the local economy. There would also be economic benefits through the construction phase of the development. At this stage, it is unknown whether there would be environmental benefits.

These benefits then have to be weighed against any disbenefits of the scheme

Whilst the site is not be classified as 'inappropriate' development within the Green Belt, the site is still located outside of defined settlement limits in the Wokingham countryside and would not meet any of the exceptions for development as outlined in policy CP11. As such, under any future planning application, the applicant/ agent would have to robustly demonstrate as to why the proposal is acceptable in relation to the overarching aims of policy CP11; particularly the aim of 'maintaining the quality of the environment'. Some positive aspects of the scheme have been identified such as the siting and architectural detailing of the development appearing to be suitable in the surrounding context, however full and final comments on design cannot be made at this stage in the absence of full plans.

The locational sustainability of the site for a new dwelling is not ideal, with services and facilities not being in desirable walking distances from the site meaning there would likely be reliance on the private motor car. However, it is acknowledged that this would not be an isolated dwelling and the Local Highways Authority do not raise objection to the site sustainability. This will be considered in the overall planning balance.

Guidance has been provided on other technical matters relating to highways, trees and ecology.

Whilst the above conclusions, particularly the proposal's acceptability in relation to the Green Belt, are contrary to historic decisions made by the Council and Inspectors for other single dwelling schemes on the site, there are material differences in policy (within the NPPF) specifically in relation to how residential development in the Green Belt is required to be assessed.

The full and final balancing exercise and weight of benefits and disbenefits of the scheme could only be undertaken when in receipt of all required information and technical documents.

Submitting a Planning Application

If you are ready to apply, please submit an application through the [Planning Portal](#). Specific documents are set out in the appendices below but refer to the Local Validation List available on the council's [how to apply for planning permission page](#) to assist you with ensuring the plans and documents submitted meet our validation requirements.

Other Guidance

Your development may also require Building Regulation approval to ensure it is built to national safety, design, and environmental standards. The Council's Local Authority Building Control (LABC) service offers a full range of plan approval, inspection, and associated services through an ISO9001 nationally accredited team of qualified building surveyors. These surveyors work closely with the Council's planning department to ensure the appropriate construction of your build. To find out more visit the Council's [Building Control website](#) or call 0300 790 0580 to speak to a member of the team.

If your project requires a dropped kerb on the road in front of your house then you may require consent from the highway authority; further information is available on the Council's [dropped kerbs page](#). Finally, if your project includes 100 sqm or more of new floor area then it is liable for the community infrastructure levy. Refer to the Council's [CIL page](#) for more information.

This concludes the pre-application process and I trust that this informal advice is of use to you. Please be aware that it is given without prejudice to any future decision that the Council may take. If you would like further advice, then a new pre-application submission and associated fee will be required.

Yours sincerely,

Connie Davis

Principal Planning Officer

Authorised by: 

Enc. Appendices one to five

Appendix One – Relevant Policies and Guidance

The relevant policies associated with this proposal are as follows:

National Policy Core Strategy 2010 (CS)	National Planning Policy Framework (NPPF)
	National Planning Policy Guidance (NPPG)
	CP1 – Sustainable Development
	CP2 – Inclusive Communities
	CP3 – General Principles for Development
	CP4 – Infrastructure Requirements
	CP5 – Housing Mix, Density and Affordability
	CP6 – Managing Travel Demand
	CP7 – Biodiversity
	CP9 – Scale and Location of Development Proposals
	CP11 – Proposals Outside Development Limits
	CP12 – Green Belt
	CP15 – Employment Development
	CP17 – Housing Delivery
	CC01 – Presumption in Favour of Sustainable Development
	CC02 – Development Limits
	CC03 – Green Infrastructure, Trees and Landscaping
Managing Development Delivery Local Plan 2014 (MDD Local Plan)	CC04 – Sustainable Design and Construction
	CC05 – Renewable Energy and Decentralised Energy Networks
	CC06 – Noise
	CC07 – Parking
	CC09 – Development and Flood Risk
	CC10 – Sustainable Drainage
	TB01 – Development within the Green Belt
	TB05 – Housing Mix
	TB07 – Internal Space Standards
	TB08 – Open Space, Sport and Recreational Facilities Standards
	TB18 – Garden Centres and Other Small Rural Units outside Development Limits
	TB21 – Landscape Character
	TB23 – Biodiversity and Development
	SS1 – Sustainable development principles
	SS2 – Spatial strategy and settlement hierarchy
Wokingham Borough Local Plan Update (LPU)	SS4 – Development within or adjacent to minor settlements
	SS5 – Development in the countryside
	SS6 – Development in the Green Belt
	SS10 – Meeting our housing needs
	CE1 – Design principles for efficient buildings
	CE3 – Environmental standards for residential development
	C1 – Active and sustainable transport and accessibility
	C2 – Mitigation of transport impacts and highway safety and design
	C5 – Parking and electric vehicle charging
	H1 – Housing mix, density and standards
	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
	HC5 – Environmental protection
	HC9 – Contaminated land and water
Other	Borough Design Guide Supplementary Planning Document CIL Guidance + 123 List

Appendix Two – Site History

The relevant planning applications associated with this site are as follows:

Application Number	Description	Decision
170445	Full planning application for the proposed erection of a single storey dwelling with basement and detached garage following demolition of 3 existing structures and clearance of site.	Refused and appeal dismissed due to concerns over development in the Green Belt, impact on the character of the area and impact on biodiversity and ecology
152003	Application for a Certificate of Lawfulness for existing use for the use of the land for storage associated with a nursery business	Approved
150511	Application for a certificate of lawful existing use for the use of the land for office and storage associated with a nursery business.	Withdrawn
021752	Outline application for the proposed erection of one dwelling.	Refused and appeal dismissed (for impact on the Green Belt and the site being outside of settlement limits)

Appendix Three – Consultee Responses

The relevant consultee responses are summarised below. Where indicated, responses are attached in full.

Consultee	Summary
WBC Environmental Health	No objection

WBC Drainage	Further information required
WBC Highways	Further information required
WBC Landscape and Trees	Further information required
WBC Ecology	No comments received
WBC Waste Services	No comments received
WBC Cleaner and Greener	No comments received
WBC Green Infrastructure	Financial contribution towards public open space required

Appendix Four – Validation Requirements

The documents required for validating any future planning application are as follows:

- – required document
- – possibly required document: these may either help determine an application or resolve the need to use a pre-commencement condition

Please note supporting information with regards to what details are required for each document are contained on the following page on the Council's website: [how to apply for planning permission page](#). Please independently consult the validation checklist.

Standard Documents

Application form	●
Location Plan (1:1250) and Block Plan (1:500)	●
All plans to metric scale and to show existing and proposed	●
- Floor Plans	
- Elevation Plans	
- Roof Plans	
- Site Layout Plan	
Correct fee (where one is necessary)	●
CIL Form 0	●

Additional Documents

Biodiversity survey and report	●
Design and Access Statement	●
Tree Survey / Arboricultural Statement	●
Water Course / Drainage Statement	●

Appendix Five – Legal Agreements and Community Infrastructure Levy

If your development requires a legal agreement pursuant to section 106 of the Town and Country Planning Act, this will need to be signed and completed prior to determination of any application. Preparing and completing an agreement will be carried out by the Council's legal department and is subject to a separate charge and Land Registry fee. **As**

As the proposal is for residential development, it **would** be liable to pay the Community Infrastructure Levy (CIL). The CIL charge rate is calculated on the net additional floor space at a per square metre charge. Some exemptions may apply and it is advised to look at the Council's [community infrastructure levy advice page](#). A CIL form is required to make your application valid.