

Date: 5 February 2024
Application: 240083



**WOKINGHAM
BOROUGH COUNCIL**

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Pre-application Advice Response Letter

Application Number: 240083

Site Address: The Coppers, Penny Lane, Wargrave, Wokingham, RG10 8PB

Expiry Date: 12 February 2024

Proposal: Pre-application advice for the demolition of the existing annexe and erect a new detached building.

Dear ██████████

Thank you for your request for planning advice which was validated on 15 January 2024. This letter will provide advice about your project and what you may need to do when submitting a planning application.

At this stage, we have not consulted anyone else about your project, such as your neighbours, but we would do so if a planning application is submitted. Before you submit a planning application, we recommend that you discuss your project with your neighbours. Also, most applicants employ an agent to submit their planning application for them.

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.

Description of Proposal

The proposal would involve the demolition of the existing annexe building and the erection of a replacement annexe building. The proposed annexe would be a T-shaped building and would have an approximate maximum depth of 9 metres and a

maximum width of 11 metres.

Site and Surroundings

The site consists of a large chalet bungalow, which is set in a substantial plot off Penny Lane. The site is on a slope and sits at a higher level than the road, so overlooks the road. There is a large, landscaped garden, parking area and tennis court to the southwest of the site. The existing annexe building sits to the southeast of the access to the site and is approximately 40 metres from the host dwelling.

To the northeast of the site, there is open countryside. To the southeast of the site, there is the Hennerton Golf Course and south of the site there is woodland. There are dwellings in the surrounding area, to the southwest and west of the site, but overall coverage along the main Kenton's Lane has a relatively sparse coverage of residential dwellings.

Planning History

Previous planning applications can be important in understanding what might be acceptable on the site now. Any relevant applications are set out below:

Application Number	Description	Decision & Date
232500	Application for a certificate of lawfulness for the proposed erection of a single storey detached outbuilding.	Approve 1 December 2023
231902	Application for a certificate of lawfulness for the proposed erection of a detached outbuilding to form a triple garage.	Approve 21 September 2023
011674	Proposed single storey rear extension to dwelling.	Approve 19 March 2001
002068	Proposed dormer extension to dwelling and balcony extension.	Approve 10 November 2000

Planning Constraints.

- Countryside
- Green Belt
- Bat Roost Suitability
- Tree Preservation Order

Assessment of Project

Planning applications are considered against national and local planning policy. The policies most relevant to your project are listed below and you can read the policy documents here:

- [National Planning Policy Framework \(NPPF\)](#)
- [National Planning Policy Guidance \(NPPG\)](#)
- [Core Strategy](#)
- [Managing Development Delivery Local Plan](#)
- [Borough Design Guide](#)
- [Village Design Statements](#)

Your scheme has been assessed against the following criteria:

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. 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.

Green Belt.

The site is within the Green Belt. The Government attaches great importance to Green Belts. Paragraph 152 of the National Planning Policy Framework (NPPF) indicates that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Paragraph 145 of the NPPF indicates limited exceptions to inappropriate development. 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. This approach is reflected in the NPPF as well as Core Strategy Policy CP12 and adopted Managing Development Delivery Local Plan Policy TB01, which aligns with the NPPF test that permits extensions provided they are not disproportionate over and above the size of the original building. The NPPF says the following with regard to Green Belts:

152: Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

153. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

*154. A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are... **'the extension or***

alteration of a building provided that does not result in disproportionate additions over and above the size of the original building or the replacement of a building, provided the building is the same use and not materially larger than the one it replaces’.

As can be seen above, paragraph 154 establishes that an extension or alteration to a dwelling within the Green Belt, providing the extension of any building does not result in disproportionate additions over and above the size of the original building and that any development contrary to this would be inappropriate development in a Green Belt Location.

Countryside.

The application site is located outside of settlement limits and within designated countryside outlined by policy CP9 of the Core Strategy as such an assessment against policy CP11 is also required. In line with the NPPF, Core Strategy Policy CP11 seeks to protect the intrinsic beauty of countryside locations. The Policy advises 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: inter alia:

- 1) It does not lead to excessive encroachment or expansion of development away from the original buildings; and*
- 2) In the case of residential extensions, does not result in inappropriate increases in the scale, form, or footprint of the original building...’*

Design and Character.

Impact on Green Belt.

As mentioned in the ‘Principle of Development’ section above, the site is within the Green Belt and is thus subjected to specific Green Belt policy. The policy context presented by the Local Plan, and by the NPPF, requires an assessment of the size, scale, and design of any proposed extension in order to establish whether the proposal is in keeping with the original building and does not result in a disproportionate addition. Policy TB01 of the MDD requires that extensions to dwellings in the Green Belt are of a ‘limited scale’ defining limited as 35% over and above the volume of the original dwelling. Any extensions over 35% would therefore be inappropriate development.

The NPPF highlights that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open and that the essential characteristics of Green Belts are their openness and their permanence. There is no definition of openness in the NPPF, however in Green Belt context, it is generally held to refer to freedom from, or the absence of development.

Whether outbuildings are classed as extensions to a building are often questioned. *Sevenoaks DC v SoS & Dawe* 1997 establishes that outbuildings can be included in

Green Belt calculations, especially if they present a 'normal domestic adjunct'. This would mean that any outbuildings that would be used for normal domestic uses such as a garage could be used in Green Belt calculations to determine a limited increase in volume from the original building.

The proposal would create accommodation and use that would be considered to be ancillary to the host dwelling and a normal domestic adjunct. Therefore, the proposal would most likely be assessed against para. 154-part c of the NPPF, which is for extensions or alterations to a host dwelling. As per policy TB01 of the MDD Local Plan, alterations or extensions should not result in an increase in volume of the original building (as it stood pre-July 1948 or as it was originally built) of more than 35%. This increase in volume would incorporate the volume of any existing extensions or additions that have already been built as well as the proposed development to assess how much the host dwelling has already been increase in volume. Therefore, the following volumes would need to be provided:

- Original building (as it was pre- July 1948 or as it was originally built.
- Volume of any previous additions or extensions to host dwelling (must be implemented, not just approved)
- Volume of the proposed development.
- Volume of any buildings/extensions to be demolished.

There has not been any value for the volume of the host dwelling, or any other extensions has been provided as part of the submission, so a calculation into the volume increase cannot be completed. The proposed annexe would have a lesser volume than the existing to be demolished by approximately 13 m³, so it is likely that there would not be more than a 35% increase in volume. However, all the requested volumes would need to be provided on submission of a formal planning application before any formal assessment can be made.

If the proposal would be more than 35% increase in volume, then 'Very Special Circumstances' would need to be demonstrated. These circumstances would not exist unless there is a clear reasoning and need that would outweigh the increase in volume. For example, if there were a proposed certificate application approved for the same outbuilding or similar outbuilding that would have the same use and would be in the same location on the plot, this would present a 'fallback position' and would be considered a 'Very Special Circumstance'. However, applying for proposed certificates just to have a greater, implementable volume is not advised as the 'fallback position' may not even be considered as a 'Very Special Circumstance' and may result in a refusal in principle.

It is not clear from the plans, but the proposed annexe appears to be for use as ancillary to the host dwelling, so could be considered under a householder application. However, the proposed annexe could be made into a separate dwelling. If this is the case, then the application would not be a householder application and would be considered as a full application. This means that part c of para 154 would not be used to assess the scheme, but instead part d of para 154 would be used. This part states that replacement buildings would be acceptable development if they have the same use as the building to be replaced and would not be materially larger than the existing building. The proposed annexe would have a reduction in volume of

13 m³, which means that it would not be materially larger than the existing building to be replaced. However, the use would need to be clearly demonstrated that it would be the same or similar as the existing building, so this would need to be provided on submission of a formal application.

Impact on Countryside.

CP11 of the Core Strategy states that proposals should not lead to ‘*excessive encroachment or expansion away from the original buildings*’ and ‘*should not lead to inappropriate increases in the scale, form or footprint of the original building*’.

The proposed annexe would replace an existing building in the same location as the proposed. The proposed annexe building would have an approximate footprint of 72 m² and the footprint of the existing annexe building is approximately 74 m², which means that the proposed would have a lesser footprint. This means that the total footprint of buildings on site would be reduced. The proposed annexe building would be in the same or similar location to the existing annexe buildings so it would not lead to the development of a part of the plot that has not previously been developed. Therefore, the proposed annexe building would not result in any excessive encroachment or expansion away from the original buildings and into the countryside, so it is unlikely that the proposal would conflict with policy CP11 of the Core Strategy.

Design and Character.

Policy CP3 of the Core Strategy states that proposals should be of an appropriate scale of mass, built form and character. Section 4 of the Council’s Borough Design Guide (BDG) sets out advice for residential developments.

The existing annexe building consists of two buildings that are link attached and are in an L-shaped formation. The existing building is relatively simple with a front gable and a gentle pitched side element. The external finish appears to be partially white painted brick and timber cladding. The host dwelling also appears to have a white painted brick finish and the existing buildings are complimentary to this.

The proposed annexe building would be equally simple, with a gentle pitched roof and gable features to the northwest, southwest and southeast elevations. The design would not be architecturally complex and would be a chalet style, which is similar to the host dwelling, which is a chalet-style bungalow. The details of the materials are not clear in the submission, but they should try to be complementary to the host dwelling.

The number of dwellings in the area is quite limited as the site appears to be the only dwelling along Penny Lane, so the context is limited. The proposed replacement building would be single storey and would be in the same/similar place to the existing annexe building. Also, the annexe building would be well-screened from view from the north and east of the site due to the dense landscaping and woodland the surrounds the site. The site would have limited public realm views as the site is set on a slope, at a higher level than the public footpath.

There would be concern that the proposed annexe building would be used as a separate dwelling. Hence, if considered acceptable, a condition would be likely imposed to ensure that the annex is retained as such and not sold and let separately as a self-contained unit. Though there is a variance in the size of dwellings in the area, they are mostly large, detached dwellings set in substantial plots. If the annexe were to be converted to a separate dwelling, it would be out of character due to it being a small and compact building and due to the additional residential paraphernalia, that would occur, e.g. refuse/recycling bins, vehicle parking, washing lines, children's toys etc. Also, the site would be an unsustainable location due to being in the countryside, so a new dwelling in this area would be discouraged. However, it is not clear if this is the intended use of the proposed annexe. Therefore, a formal planning application would need to clearly demonstrate if the proposal would be for use as ancillary accommodation or as a separate dwelling. If it would be a separate dwelling, then a full application would need to be submitted although it would be unlikely to receive support at officer level.

Overall, the design would not be significantly different to the existing annexe building and would be complementary to the host dwelling. The proposed would replace an existing building on site and would have a lesser height and footprint. Also, the site is well screened from public view. Therefore, it is considered that the proposed annexe building would result in harm to the character and would comply with CP3 of the Core Strategy and would likely to be acceptable if it were to be ancillary to the host dwelling. If it were to be a separate dwelling, then the proposed would conflict with policy and would not be acceptable.

Neighbour Impact.

Policy CP3 of the Core Strategy states that developments should not result in a detriment to the amenity and enjoyment of adjoining land users. The site has limited neighbours as to the north, there is open countryside, to the east is Hennerton Golf course and to the south is dense woodland. There are adjoining dwellings to the northwest and west of the site, but the proposed development would be approximately 88 to 100 metres from these dwellings. Therefore, there would be limited harm to the neighbouring dwellings.

Trees and Landscape.

Policy CC03 of the MDD Local Plan states that proposals should ensure that they protect and enhance the Borough's Green Infrastructure and that they should protect and retain existing trees, hedges, and other landscape features.

The site falls within the blanket tree preservation order (TPO) TPO-0002-1951-Woodland. The WBC Landscape and Trees officer has been consulted. They have stated that there are no major trees and landscape concerns. The proposed development would be moved further away from the trees to the northeast boundary. Also, the arboricultural report that has been provided details how services to the proposed building could be accommodated and that full tree mitigation has been demonstrated. For any formal application, details of the services for the proposed annexe building would need to be provided to ensure that there is no adverse harm

to the trees on site. Also, the mitigation measures would need to be submitted and approved in writing, so the arboricultural report would be required.

Overall, the proposal would comply with policy CC03 and would most likely be acceptable from a trees and landscape perspective in a formal application.

Flooding and Drainage.

Policy CC09 of the MDD Local Plan states that all sources of flood risk must be considered to avoid inappropriate development in areas at risk of flooding and should follow the guidance listed within the NPPF.

The site is within Flood Zone 1, so has minimal risk of flooding. The WBC Drainage officer has provided comments and they have stated that they would have no objection to the proposal. They have requested that a drainage strategy be provided in order to rule out any adverse drainage and flooding impacts that may occur. Within the strategy, the following things should be provided:

- Calculations indicating the existing runoff rate from the annexe.
- BRE 365 test results demonstrating whether infiltration is achievable or not.
- Use of SuDS following the SuDS hierarchy, preferably infiltration.
- 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.
- 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.
- Groundwater data confirming seasonal high groundwater levels in the area.
- 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.
- Details demonstrating how any SuDS for this development would be managed throughout the lifespan of the development and who will be responsible for maintenance.

Ecology.

The pre-application submission provides a preliminary bat roost assessment and an emergence survey. The emergence survey states that no bats were found entering or emerging from B3, which forms part of the existing annexe building. Therefore, if this building were to be removed, there would be no adverse impact on bat roosts because of the removal of the existing annexe buildings.

No comments have been received by the WBC Ecology officer, but as the surveys demonstrate, there would be no significant harm to bat roosts as a result of the proposed works. The proposed building would be moved away from the trees on site, so it is unlikely that the proposed works would impact bat roosts in the trees or nesting birds.

It is encouraged that biodiversity and ecological enhancements are provided. The preliminary ecology appraisal provides mitigation measures and enhancement opportunities. Although there would not be significant impact on ecology and biodiversity on site, it is encouraged that some of these enhancement measures are installed to improve the overall ecological quality of the site.

Overall, the proposed works would result in minimal harm to ecology and biodiversity on site. The provided ecology reports provide mitigation and enhancement measures, which would make a formal application more favourable to the WBC Ecology officer. For a formal planning application, the preliminary bat roost and ecology assessment and the emergence survey should be provided. Further details of enhancement measures are encouraged to be provided on submission.

Highways.

The site has a significant level of off-street parking. The proposal would not remove any of this parking space. Therefore, the proposal would comply with policy CP6 of the Core Strategy and would not significantly impact parking availability and highway safety. A formal planning application should have a parking plan indicating the existing and proposed parking provision on site. All parking spaces should measure 5 m x 2.5 m.

Summary

In summary, the project accords with national and local policy and therefore is likely to be acceptable provided it is retained as ancillary accommodation to the host dwelling.

Once you are ready, we would recommend that you obtain several quotes from planning agents and employ one to submit your planning application for you. Householder applications can be submitted on the [Planning Portal website](#). Please use the information available on the council's [how to apply for planning permission page](#) to help you submit the right plans and documents.

In addition to the application form, community infrastructure levy form and application fee, we would expect to see:

- Location Plan
- Site Plan
- Parking Plan
- Existing and Proposed Floor Plans
- Existing and Proposed Elevation Plans
- 3D GCI Images
- Preliminary bat survey
- Bat emergence survey
- Tree survey
- Arboricultural Assessment
- Drainage Strategy

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,



Planning Officer

Authorised by:

