

**Date:** 4 December 2024  
**Application:** 242381



**WOKINGHAM  
BOROUGH COUNCIL**

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### **Pre-application Advice Response Letter**

**Application Number:** 242381

**Site Address:** Suncot, School Road, Barkham, Wokingham, RG41 4TR

**Expiry Date:** 28 November 2024

**Proposal:** Pre-application advice for the proposed erection of 2no. 5 bedroom detached residential units and a leisure complex.

Dear [REDACTED]

Thank you for your request for planning advice which was validated on 3 October 2024. 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 application site is located in the Borough's designated countryside within Langley Common, a small cluster of residential development between Arborfield Cross (to the west) and Arborfield Garrison (to the south-east). The proposal comprises approximately 0.44Ha of land to the rear of the property known as "Suncot". The site is accessed via the site frontage of Suncot, a bungalow with converted attic space, and forms part of the residential garden of this property. The site is surrounded by the rear gardens of properties along School Road and Langley Common Road. Further to the south-west of the site is open agricultural farmland.

It is noted that part of the rear (western area) of no. 14 Langley Common Road is also included within the site's defined red line. However, historic planning information for this property shows this area does not form part of no. 14's residential garden.

## Description of Proposal

This pre-application submission seeks advice relating to the proposed erection of 2no. dwellings and a leisure complex on land to the rear of Suncot, School Road, Arborfield.

According to the proposed plans, the dwellings would have the following dimensions: 9.3 metres (depth) x 17.5 metres (width) x 6.9 metres (height). The leisure complex would have a height of approximately 8.2 metres, covering an area of approximately 235 sqm.

The dwellings and leisure complex would have their own private amenity space to the rear of the properties and a shared drive, which would utilise an existing access from School Road.

It should be noted that a detailed site layout and section plan has been submitted, however, the submission is not accompanied by elevations drawings or floor plans. As such, only general observations can be made on certain areas of assessment. Limited information has been provided as to the proposed use of the leisure complex and type of activities that may take place here, nor has any justification for this type of development been suggested.

This pre-application submission follows the refusal of planning application 210874, which sought permission for the erection of four residential units on the application site.

## Planning Constraints

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

- Countryside
- Green Route and Riverside Paths – Barkham Road
- Affordable Housing Thresholds
- Bat Roost Habitat Suitability
- Local Plan Update – site was not included in the list of sites allocated for residential/mixed use.
- Thames Basin Heaths SPA Mitigation Zones – 5Km
- Flood Zone 1

- SSSI Impact Risk Zones
- Landscape Character Assessment Area J2; 'Arborfield Cross and Barkham Settled and Farmed Clay'

## Assessment of Proposal & Key Issues

### Principle of Development:

Planning law states that applications for planning permission must have regard to Section 38 (6) of the Planning and Compulsory Purchase Act 2004, which requires that proposals be determined in accordance with the Local Development Plan unless material considerations indicate otherwise. In this case, the development plans consist of the Core Strategy 2010 and Managing Development Delivery Local Plan 2014. The requirements of Section 38(6) are also contained within Policy CC01 – Presumption in Favour of Sustainable Development. The National Planning Policy Framework (NPPF) must also be considered as it constitutes guidance which the Local Planning Authority must pay regard to. The NPPF does not change the statutory status of the development plan as the starting point for decision making, however, is a material consideration in any subsequent determination.

### Development Plan:

#### Location in the Countryside

The site is located within the Countryside, outside settlement limits. Policy CP9 of the Core Strategy seeks to direct new development to established settlements rather than the countryside. However, when development within the countryside is put forward, it is required to comply with Policy CP11 of the Core Strategy as a starting point. 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 would introduce both dwellings and a leisure complex (community facility) into an area of undeveloped countryside. This does not comply with any of the exceptions in CP11. The proposal is therefore contrary to the development plan, being outside of development limits and is unacceptable in principle.

The overriding purpose of Policy CP11 is to direct development within the development limits and to ensure development is located in the most sustainable places, to protect the identity of settlements and preserve the open character of the countryside. The site, being outside the Modest and Limited Development Locations of Arborfield, is contrary to the adopted spatial strategy established in the Development Plan.

#### *Sustainability of Location*

Policies CP1, CP4, CP6, CP9 and CP11 of the Core Strategy permit development where it is based on sustainable credentials in terms of access to local facilities and services, and the promotion of sustainable transport.

Expanding on this, paragraph 4.57 in the Core Strategy aims to prevent the proliferation of development in areas away from existing development limits as they are not generally well located for facilities and services and would lead to the increase in use of the private car, since they are poorly served by other transport modes, contrary to Policy CP6. An objection to the proposal from the Council's Highways team has been made regarding this.

Paragraph 2.16 recognises that the borough has one of the highest car ownership rates of any English local authority. To reduce the likelihood that these vehicles will be used and to encourage modal shift, it is important to ensure all proposals achieve sustainable development.

The NPPF seeks to promote sustainable travel in decisions with consideration of:

- a) The opportunities for sustainable transport modes that have been taken up depending on the nature and location of the site to reduce the need for major transport infrastructure;*
- b) Safe and suitable access to the site that are achieved for all users;*
- c) Any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.*

There has been no assessment on the sustainability of the location within the pre-application statement. Within my own initial analysis, it is noted there are limited services within walking distance to the application site.

Section 4.4.1 of the Manual for Streets by the Department for Transport states that 'Walkable neighbourhoods are typically characterised by having a range of facilities within 10 minutes (up to about 800 m) walking distance of residential areas which

residents may access comfortably on foot.’ Using this statement, the development would not be considered within walking distance from important services. Excluding the Coombes C of E Primary School and the Bull Public House, the rest of facilities would not be within the recommended walking distance as stated above. In addition, the walking environment along School Road or Barkham Road (to reach the PH) is poor with no street lighting, narrow footpaths and is absent from any passive surveillance for long sections. The relatively recent pedestrianisation of School Road does work in favour of the proposal, however, not to the extent that the previous concerns are avoided.

With regards to public transport, there are two bus stops approximately 180m walking distance from the proposal site, on Langley Common Road. However, the only bus route serving this road is the 145 (between Three Mile Cross and Winnersh), which runs each way once per week (Tuesday). As stated in the previously refused application (ref: 210784), this bus service does not satisfy the Council’s definition for a good public transport, which requires a service frequency of at least every 30 minutes during peak times (7am-9am and 4pm-7pm Monday to Saturday) and every 60 minutes during off-peak times (9am-4pm and 7pm-10pm Monday to Saturday and 7am-10pm on Sundays) (paragraph 4.37 of the Core Strategy).

As a result of all these factors, occupants of the proposed application site may be discouraged from walking or cycling, particularly during darkness and poor weather, when the route would be less safe. Consequently, access to services and facilities is likely to rely more heavily on use of a private car. Hence, the proposed site does not represent a sustainable location for the development and proposal is contrary to Policies CP1, CP3, CP6 and CP9 of the CS and CC01 of the MDD.

The impact of this is heightened when considering that part of the proposal seeks to construct a leisure complex, whereby the nature of this use would require a significant number of visitors to and from the site throughout the day, thus increasing the number of journeys made by private car.

#### Development of Residential Garden

The application site is part of a residential garden and paragraph 72 of the NPPF states that *‘local planning authorities should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area’*.

Policy TB06 – Development of Private Residential gardens – of the MDD Local Plan states that proposals for new residential development that includes land within the curtilage of private residential gardens will only be granted planning permission where:

- a) The proposal makes a positive contribution to the character of the area in terms of:
  - i. The relationship of the existing built form and spaces around buildings within the surrounding area;
  - ii. A layout which integrates with the surrounding area with regard to the built up coverage of each plot, building line(s), rhythm of plot frontages, parking areas,
- and

- iii. Existing pattern of openings and boundary treatments on the site frontage
- iv. Providing appropriate hard and soft landscaping, particularly at site boundaries.
- v. Compatibility with the general building height within the surrounding area
- vi. The materials and elevational detail are of high quality, and where appropriate distinctive and/ or complementary
- b) The application site provides a site of adequate size and dimensions to accommodate the development proposed in terms of the setting and spacing around buildings, amenity space, landscaping and space for access roads and parking
- c) The proposal includes access, which meets appropriate highway standards
- d) The proposal does not lead to unacceptable tandem development
- e) The design and layout minimises exposure of existing private boundaries to public areas and avoids the need for additional physical security measures

The development would respond negatively to the pattern / grain of development in the surrounding area as the dwellings and leisure complex would be outside of the established building lines along School Road and Langley Common Road. This is to be explored in further detail in the 'Character of the Area' section of this letter, but it is considered that the proposal would not accord with Policy TB06 of the MDD.

#### Isolated Dwelling in the Countryside

Paragraph 84 of the NPPF seeks to avoid new isolated homes in the countryside unless one or more of the following circumstances apply:

- a) there is an essential need for a rural worker, including those taking majority control of a farm business, to live permanently at or near their place of work in the countryside;*
- b) the development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets;*
- c) the development would re-use redundant or disused buildings and enhance its immediate setting;*
- d) the development would involve the subdivision of an existing residential building; or*
- e) the design is of exceptional quality, in that it:*
  - is truly outstanding, reflecting the highest standards in architecture, and would help to raise standards of design more generally in rural areas; and*
  - would significantly enhance its immediate setting, and be sensitive to the defining characteristics of the local area.*

In addressing the proposed development, the first consideration is whether the site is in an isolated location. The NPPF does not provide a definition of what constitutes 'isolated' development. Therefore, in considering whether or not the current application site is 'isolated', reference has been given to case law and planning appeal decisions.

Courts have held that the term 'isolated' should be given its ordinary meaning as being 'far away from other places, buildings and people; remote'. The judgement concluded that in the context of (former) paragraph 55 of the previous NPPF (2012) 'isolated'

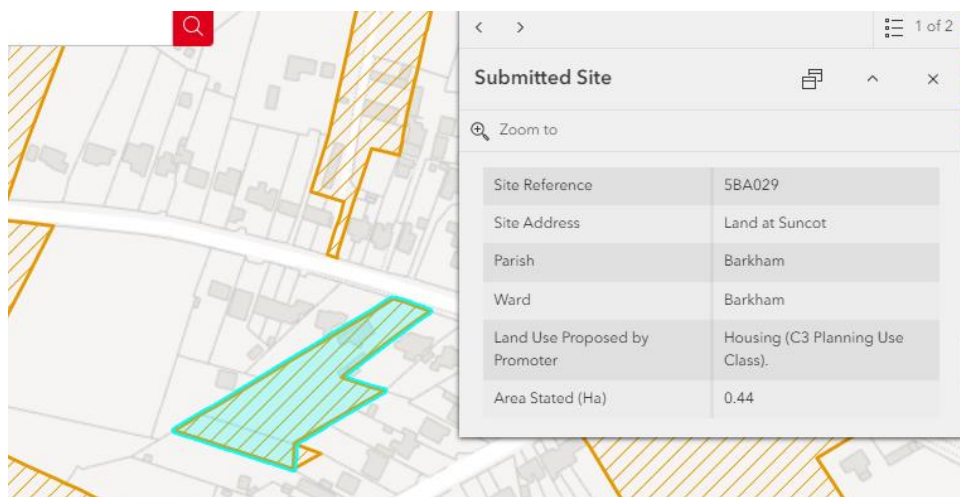
simply connotes a dwelling that is physically separate or remote from a settlement. Whether, in a particular case, a group of dwellings constitutes a settlement, or a 'village', for the purposes of the policy will again be a matter of fact and planning judgment for the decision-maker. The Court rejected the argument that the word 'isolated' as set out within the NPPF could have a dual meaning, being physically isolated or functionally isolated (isolated from services and facilities).

In consideration of the above, the proposed dwellings would not be physically isolated from other buildings or people, and therefore would not be considered isolated dwellings.

### Emerging Local Plan

The Local Plan Update (LPU), the plan which will supersede the adopted Core Strategy and Managing Development Delivery (MDD) local plans, is at the consultative stage of preparation. To date, the council has consulted on two draft strategies for the LPU: the Draft Plan (2020) and the Revised Growth Strategy (2021). Currently, the Proposed Submission Plan (Regulation 19) has been published.

The application site initially came forward as a Submitted Site for housing (C3), as seen from the plan below.



The proposed allocation drew upon the Housing and Economic Land Availability Assessment (HELAA) (2021) which considered the broad suitability, availability and achievability of land promoted across the borough. The assessment of the site 5BA003 & 5BA029 concluded the land to be unsuitable because it was detached from the settlement boundary and did not meet any of the exception criteria.

The emerging Local Plan is afforded limited weight in the overall balance, however, the sites identification as an unsuitable location for housing must be acknowledged.

### Joint Minerals and Waste Plan

The Central and Eastern Berkshire Joint Minerals and Waste Plan (Joint Plan) was adopted by Wokingham Borough Council on 19 January 2023. The Joint 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 pre-application site is not located within the MSA, therefore would not be in conflict with these policies.

### Housing Land Supply

The latest published assessment of housing land supply concluded a deliverable supply of 3.95 years.

The NPPF states under paragraph 11 that where a local authority is unable to demonstrate a five-year supply of deliverable housing sites, the most important policies relating to the application may be viewed as being out of date. It continues to advise that unless there are specific policies in the NPPF protecting the land subject to the application, that permission should be granted unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the NPPF as a whole.

The December 2023 NPPF introduced a revised approach to housing land supply, to better reflect progress made with local plans:

*“From the date of publication of this revision of the Framework, for decision-making purposes only, certain local planning authorities will only be required to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of four years’ worth of housing (with a buffer, if applicable, as set out in paragraph 77) against the housing requirement set out in adopted strategic policies, or against local housing need where the strategic policies are more than five years old, instead of a minimum of five years as set out in paragraph 77 of this Framework.”*

This applies to authorities which have an emerging local plan that has either been submitted for examination or has reached Regulation 18 or Regulation 19, including both a policies map and proposed allocations towards meeting housing need. These arrangements apply for a period of two years from the publication date of this revision of the Framework.’ (NPPF: 226)

The council published a Draft Local Plan for consultation in 2020, including proposed housing allocations and a policies map. This meets the criteria set out in the NPPF that would require a lower 4-year housing land supply. Nonetheless, the council’s HLS remains below 4 years.

This presumption in favour of sustainable development outlined in paragraph 11 of the NPPF is commonly referred to as the ‘tilted balance’. It should be noted that the application of paragraph 11 of the NPPF does not change the statutory status of the development plan as the starting point for decision-making. This is set out clearly in paragraph 12 of the NPPF and is a matter of law.

Material to decisions on planning applications involving housing is the underlying reasons for the shortfall (whether 5 or 4 years) in deliverable housing sites. The



shortfall is not as a result of non-delivery of housing but due to the significant over delivery in recent years reducing the bank of land with extant planning permissions.

All evidence and assessments show that whether the housing target is defined through the requirement set out in the Core Strategy or the outcome of the standard method set out in national Planning Practice Guidance, delivery has significantly exceeded the target. If over delivery were taken into account over the whole Core Strategy plan period or since the introduction of the standard method, there would be no shortfall over the coming five years, with over delivery significantly exceeding the shortfall.

In this context, the weight to be attached to the benefits of additional housing under paragraph 11 of the NPPF should be tempered. This reflects the approach set out in the following appeals where the Inspectors only applied moderate weight to the provision of additional housing:

- Willow Tree House (Application ref: 203560, Appeal ref: APP/X0360/W/21/3275086)
- Land at Baird Road (Application ref: 202303, Appeal ref: APP/X0360/W/21/3276169)
- Land to the west of St Anne's Drive and south of London Road (Application ref: 203544, Appeal ref: APP/X0360/W/22/3297645)

The lack of a four-year supply of deliverable housing sites results in the presumption in favour of sustainable development, as envisaged by paragraph 11 of the Framework being engaged. Whilst the tilted balance is engaged, this tilt is tempered due to past over delivery

### Community Facilities

Core Strategy policy CP2 encourages the provision of sustainable and inclusive communities including provision of community facilities to meet the long term needs of the Borough. Policy CP3 also states that planning permission will be encouraged for recreational/sporting facilities and that for an appropriate sustainable network of community facilities.

Section 8 'Promoting Healthy Communities' of the NPPF promotes access to high quality sports and recreation facilities and states planning decisions should ensure that amenities and services are able to develop and modernise in a way that is sustainable and are retained for the benefit of the community.

The Council's Open space, sports and recreation strategy (2013) SPD sets out the clear approach it envisages for these standards. Limited information has been submitted for any comments to be provided on the consistency with this SPD, however reference should be made to Sport England Guidance on design of such facilities.

### Summary of the Principle

The site is located within the countryside and does not satisfy any of the exceptions set out in Policy CP11. The proposed dwellings and leisure complex would not be within a sustainable location meaning there would be an overreliance on a private motorcar to access the site. The principle of development in this location is therefore

not accepted and would undermine the wider strategy established by the Core Strategy.

Whilst there is an identified conflict with policies within local plan in principle, the weight afforded to those relevant local plan policies are reduced in accordance with paragraph 11 of the NPPF, however, not to the extent in which the principle of development in this case is accepted given past over delivery and lack of overriding benefits.

### **Character of the Area:**

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.

Policy CP11 supports development in the countryside only where it maintains the high quality of the rural environment. Policy CP1(1) similarly only supports development that maintains or enhances the high quality of the environment, with policy CP3 supporting development of an appropriate mass, layout, built form, height and character to the area CP3(a) and which makes a positive contribution to the sense of place contributes to the buildings and spaces themselves and in the way they integrate with their surroundings CP3(f).

Paragraph 131 of the NPPF notes that good design is a key aspect of sustainable development.

The Borough Design Guide Supplementary Planning Document provides further guidance for developers with general guidance that development should respond positively to its site and local context (G1) and respond positively to the local character of the area (G2).

Policy TB06 of the MDD Local Plan seeks to avoid inappropriate development of residential gardens where there is harm to the local area. Permission would only be granted where there is a positive contribution to the built form and surrounding spaces, integration with the layout of the surrounding area, appropriate hard and soft landscaping, amenity space, building separation and compatibility with the general building height.

The National Design Guide section B1, paragraph 67 also states that the built form of well-designed placed should relate well to:

- the site, its context and the opportunities they present;
- the proposed identity and character for the development in the wider place;

Paragraph 68 follows on from this stating that houses and streets should establish an appropriate relationship with the pattern, sizes and proportions of existing houses in the local area.

The Officer Report linked to the previously refused application outlined the prominent characteristics of the application site and wider area:

*“The proposal site is within designated countryside and is currently occupied by grassland and mature trees and hedgerows towards the site boundaries, which contribute positively to the character of the area. The host property Suncot is located towards the frontage of the plot. The site is a large plot located halfway along a small stretch of residential dwellings on both School Road and Langley Common Road. The dwellings are typically detached with ample rear gardens of about 30 metres long. There is a clearly evident linear pattern of development and strong building line, with properties located facing either School Road or Langley Common Road (including Suncot), and whilst there is a mix type of dwellings with two storey and chalet-style bungalows, it is noted that those properties immediately adjoining the proposal site are all chalet-style bungalows, whereas two storey dwellings are mainly towards the northern side of School Road and eastern side of Langley Common opposite to the proposal site.”*

The prevailing character, as identified above, has remained largely untouched, with special regard to the clear linear pattern of development along School Road and Langley Common Road.

A detailed site and layout plan has been submitted, along with a section plan which displays the front elevations of the dwellings and leisure complex. The two dwellings would be identical in appearance, having end-hipped roofs with a protruding gable, eight pitched roofed dormers, a bay window, and single storey rear protrusions. The properties would also share the same material palette. The leisure complex would be a larger and bulkier structure giving the appearance of a poorly designed block of flats. Although the intention is to differentiate it from a residential use by incorporating larger scaled windows and doors and canopies over entrances, as well as signage, it has a unfortunate appearance, particularly given it is taller than Suncot and the proposed Plot 1 dwellings by approximately 1metre dominating the rear of the site.

Having reviewed the site layouts, it is considered the level of development is indicative of overdevelopment due to the number of buildings, plus their size and scale. The layout and design of the dwellings is one synonymous within an urban setting, contrary to the rural feel of the countryside setting. This urban feel is intensified due to the mirrored appearance of the two dwellings, which would be significantly out of character with the architectural diversity of the built form along School Road and that generally observed in rural areas. Furthermore, the leisure complex, by virtue of its design, form and massing, would appear in stark contrast to the prevailing building types in the area, and would appear as an alien addition to this predominantly residential area. This is a symptom of the fact that such a use is inappropriate within the chose location, being the private garden of an existing residential dwelling.

In addition, the proposal would introduce 3no. large units as a form of backland development, outside the building line of the immediate neighbours. The layout of the proposal is therefore considered to be at odds with the linear pattern of development along School Road and adjacent Langley Common Road, where dwellings are positioned along road frontages on single plots with a consistent building line. The cul-de-sac nature of the new site layout would contrast unfavourably with the road frontage settings of existing houses and would extend residential activities into the open countryside. It has been noted that there are no other examples of tandem or backland

development in the immediate vicinity and thus, this arrangement will appear as an incongruous form of development fitted into a site located at the back of a residential garden, detrimentally affecting the character and appearance of the locality.

During the pre-application meeting undertaken between the Planning Officer, Architect and associated parties, it was stated that the buildings would not be visible from public vantagepoints, therefore mitigating any harm. However, whilst it is accepted that the land does slightly slope downwards further towards the rear of the site, it cannot be said at this stage that the development would not be visible from School Road. Suncot and the adjacent properties to the east are all bungalows with notably low ridge heights, and it is therefore likely that the 2no. dwellings and leisure complex, with maximum heights of 6.9 & 8.2 metres respectively, would protrude above the existing dwellings. In any case, it should be noted that harm to the openness of the countryside is not limited to what is visible from public areas. The development would have a clear spatial impact on the land that is currently a buffer between the built form on School Road and Langley Common Road. Policy TB06 of the MDD Local Plan is concerned with the development of private residential gardens. Amongst other things, this states at points i and ii of part 2 that: *“The relationship of the existing built form and spaces around buildings within the surrounding area; ii. A layout which integrates with the surrounding area with regard to the built up coverage of each plot, building line(s), rhythm of plot frontages, parking areas”*. For the reasons stated above, the proposal would fail to achieve this and would therefore be in direct conflict with the policy.

It was also stated in the aforementioned meeting that there is some backland development on the northern side of school road. However, this presents itself in a different way to the proposal. The majority of the buildings that sit outside of the established building line are farm buildings that serve wider agricultural uses and where there is residential development, these are in the form of modest, single storey dwellings. In any case, this does not diminish the concerns raised above relating to the impact of the proposal on the strongly maintained linear development of the dwellings on the south side of School Road and on the western side of Langley Common Road. The development on the north side of School Road falls outside of this character area.

R1 of the WBC Design Guide states that residential development should be designed to contribute positively towards the historic or underlying character and quality of the local area. This may be achieved through blending in with a positive existing character, responding where relevant to the positive elements of its historic context or, where the site is large enough to allow for a distinctive identity to be created, by establishing a new character that relates well to the existing. The proposal fails to respond to the established local context and create a form of development at odds to existing character.

In addition to the impact of the buildings themselves, the significant length of road with pavements and two turning heads, is inappropriate for this modest development, the significant covering of the site in hardstanding appears to be unnecessary for the quantum of development (2 dwellings and a modest leisure complex) and the area which is proposed for turning heads could be more appropriately used to provide public open space or more appropriate parking arrangements for the leisure complex which could enhance the design of the overall scheme.

In summary, the proposed dwellings and leisure complex do not conserve or enhance the character and appearance of the area or contribute to local context. It is acknowledged that there are fewer residential units proposed compared to the previously refused application, however, the quantum of built form is not of significant difference. The units would accumulatively cover an area of approximately 534 sqm, which in addition to the other components of development (parking etc), would change the existing verdant, undeveloped character of this backland site, resulting in the intensification of development of the countryside location, to the detriment of its rural verdant character.

## **Residential Amenity:**

### **Internal Amenity Space**

Policy TB07 of the MDD and R17 of the SPD require adequate internal space to ensure the layout and size achieves good internal amenity. The Technical housing standards – nationally described space standards defines that a five-bedroom dwelling should have a minimum gross internal area of 110 to 128 sqm. A dwelling should also accommodate for a minimum combined floor area of living, dining and kitchen space; 29sqm is advised for a 5-person dwelling according to the Borough Design Guide. The size of the proposed bedrooms would need to comply with the minimum recommended floor space for twin/double bedrooms (11.5 sqm) or 7 sqm for single bedrooms, as set out in the nationally described internal space standards.

Floor plans have not been provided with this submission, thus an assessment on internal amenity cannot be made. It is strongly recommended that compliance with the above requirements is taken into account if a formal application was to be submitted. It is also advised that all the habitable rooms be served by appropriately sized windows and fenestration and that there is scope for internal and external storage space.

### **External Amenity Space**

R16 of the SPD requires 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.

The depth of the gardens would fall short of the recommended guidance. To accommodate for this shortfall, the amenity space would wrap around to the sides of the properties. This would be characteristic of the surrounding plots, where dwellings benefit from generous garden depths.

## **Neighbour Amenity:**

Policy CP3 of the Core Strategy aims to protect neighbouring amenity. Principle R16 of the Borough Design Guide outlines the separation distances required to maintain privacy and limit sense of enclosure.

**Overlooking:** 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.

The dwellings would have separation distances in excess of 22 metres to the rear elevations of adjoining properties. Whilst this would comply with guidance, it is noted that the rear elevations of the two properties would be located in close proximity to the adjacent boundaries, thus resulting in a perception of overlooking for neighbouring residents.

*Loss of Light/Overbearing:* 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.

*Noise:* This predominately relates to the leisure facility (however there may be plant proposed at the dwellings e.g. Air Source Heat Pumps) any plant, machinery and deliveries as well as 'comings and goings' from the site will need to be considered in a detailed noise assessment. It is not clear if any plant or machinery is required, however this would be usually expected with this type of facility, furthermore it is not known when or where deliveries would occur and whether this will impact on any neighbouring properties

The application site is physically surrounded by other residential plots, however, by virtue of its backland location and adequate separation distances, the proposal would not have any loss of light, overshadowing or overbearing impact on any neighbouring residential amenity. All proposed dwellings would retain adequate separation between them in accordance with the Borough Design Guide.

### **Building Sustainability:**

Paragraph 158 of the NPPF requires local plans to *"take a proactive approach to mitigating and adapting to climate change..."* which footnote 56 makes clear should be in line with the Climate Change Act 2008 and Paragraphs 160 – 161 deal with individual development and emphasise the importance of energy efficient, low-carbon development.

Policy CC04 of the MDD Local Plan and the Sustainable Design and Construction SPD require sustainable design and conservation, and R21 of the Borough Design Guide SPD requires that new development contribute to environmental sustainability and the mitigation of climate change.

Building design should take advantage of sunlight and use recycled or sustainable building materials, building insulation, energy efficient and water saving appliances (such as an energy efficient gas-powered boiler), photovoltaic panels, compost facilities and cycle storage as well as water butts and soak-aways for rainwater reuse, permeable car parking surfaces and maximisation of soft landscaping for natural infiltration.

Overall, there exists a very strong legislative and policy basis for planning decisions to be taken with Climate Emergency considerations at their heart. WBC expects that any new dwelling should meet the requirements set out in the Climate Change Interim Policy Position Statement Wokingham Borough Council (December 2022).

There is no mention of building sustainability in the pre-application statement. If any sustainability measures were to be utilised, these must be indicated on a proposed plan or sustainability statement and this would have to be weighed against the negative impact of the scheme, such as an increased private car use as highlighted previously.

### **Landscape and Trees:**

The Landscape & Trees Officer for this application has issued the following comments.

The site is located along School Road which is in the countryside and along a Green Route. The site is located in Wokingham Borough Landscape Character Assessment (WBLCA) Area J2 – Arborfield Cross and Barkham Settled and Farmed Clay’.

Although the site is not located in the Valued Landscape – each character area has identified Valuable Landscape Attributes which, for LCA J2, consist of;

Pattern of arable and pastoral fields, which provides a rural character away from settlement, and creates an important separation between settlements. Mature hedgerow trees and in-field trees which provide a wooded character and visual interest within the landscape. Rural settlement pattern of farms, hamlets and small nucleated villages outside the urban area which provides a rural character and a link to the past.

The Landscape Strategy is to conserve and enhance the remaining rural character of the landscape. The key aspects to be conserved and enhanced are the field pattern with mature hedgerow trees, wetland and woodland habitats, rural lanes and historic features.

In terms of development, the aim is to integrate new development into its landscape setting and retain the open and rural character of the landscape between settlements.

Landscape Guidelines in relation to the site include:

Lack of the recruitment of young trees (through natural regeneration or planting) required to rebalance the age structure of parkland and hedgerow trees is an on- going threat to the character of the landscape.

Hedgerow loss and replacement with fencing associated with the expansion of fields and intensification of agriculture.

Policy TB21 requires that proposals demonstrate how they have addressed the requirements of the WBLCA including landscape quality, strategy, sensitivity and key issues. Proposals shall retain or enhance the condition, character and features that contribute to the landscape.

The southern side of the eastern end of School Road is characterised by bungalows; 'Stable View' which backs onto the garden of the corner plot '2 Langley Common Road', 2 newly built bungalows; Pype House and Grantley, and next to Grantley is 'Suncot'. Proposed Plot 2 is located behind Grantley and Plot 1 is located to the rear of Suncot. At the rear of Suncot is another building proposed as a Leisure centre.

The proposed Plots 1 and 2 as well as the Leisure Centre are 2 storey buildings, with the Leisure Centre at over 8m in height, and Plots 1 and 2 at 7m high. The garden depth of Plot 1 is 13.5m to the side and incorporates a protected Cedar tree and backs onto a dwelling known as Cerney. The Leisure centre backs onto the SW boundary and a stretch of land which contains another protected Oak tree. Plot 2 garden measures 6m at its widest and this wraps around 2 sides of the garden, which backs onto 3 gardens of Nos. 8 – 12 Langley Common Road. The garden of Suncot is reduced to 15m at its widest point and contains a group of protected Oaks trees to its front boundary with School Road as well as a single Oak tree further along the School Road boundary.

All the aforementioned trees are protected by TPO1792/2021. There are hedges around the plot boundaries. All the trees and other vegetation will need to be retained and protected in accordance with Policy CC03d of the Local Plan and an Arboricultural Implications Assessment (AIA) to BS5837:2012 is required as part of full planning application.

The pattern of development of the existing bungalows in this location is distinctive whereas further along School Road are 2 storey detached dwellings in generous plots. The proposed buildings are all 2 storey dwellings which will overlook the existing bungalows.

The proposed dwellings/leisure centre amounts to backland development which is contrary to Policy TB06 'Development of Private Residential Gardens' which states that the Council will resist inappropriate development of residential gardens where it would cause harm to the local area. The proposals must consist of a layout which integrates with the surrounding area with regard to built up coverage of each plot, building lines, rhythm of plot frontages, and parking areas.

The proposed layout does not follow the established pattern of development and locates an amenity provision at the rear of the extended plot. The proposals erode the sense of countryside and the rural setting by building out the plots into a density that equates with an urban style development.

Policy TB06 also says that the proposals should make a positive contribution to the character of the area in terms of its relationship with the existing built form and spaces around the buildings and within the surrounding area. The policy also states the development should make a positive contribution to the character of the area in terms of the existing pattern of openings and boundary treatments on the site frontage and have compatibility with the general building height with the surrounding area.

As part of a full planning application we would expect to see a Landscape Strategy for the site based on the WBLCA – J2 Landscape strategy and Guidelines, in order to meet with the requirements of Policy TB21.



## **Highways Access and Parking Provision:**

The Highways Officer for this application has issued the following comments.

### **General**

The applicant will propose to subdivide the site for erecting 2 no. of 5-bedroom detached dwellings and a leisure complex being positioned at the rear of the site. The proposed leisure complex will include a small Swimming Pool, a Studio for exercise and/or dance classes and associated Reception and Changing Facilities.

While the numbers of habitable rooms cannot be identified from the submission, 5-bedroom units will likely have 8+ no. of habitable rooms.

While the nature of the leisure complex cannot be identified from the submissions, based on the proposed facilities and parking arrangement on the plan, the leisure complex will likely be commercial. The Highways will comment on the plan based on such assumption. If such assumption will not apply, the applicant shall clarify in the formal planning application.

### **Sustainability**

A sustainability assessment will be expected in the formal submission. However, the site will likely be an unsustainable location.

While the site has some access to the pedestrian and cycle network along School Road, with reference to the refused planning application reference 210874, there is a lack of local facilities within acceptable walking distance from the site. There is also no existing crossing point and street lighting along the site frontage to provide safe and attractive environment for considering sustainable travel modes, making the site an unsustainable location.

Despite there is a pair of bus stops within 400m, the bus stops only provide one service on Tuesdays and matchdays, making car as the main mode for this site.

Subject to the scale of development, development and operational details, the Highways will require further information to decide if the site can be considered as a sustainable location. However, with the proposed building footprint and the assumption to be commercial in nature, the Highways will not be able to support the proposal.

If the applicant may still intend to proceed with a formal planning application, the required details for submission are listed below.

### **Traffic Impacts**

The traffic generated from two additional residential dwellings are unlikely to have significant impacts on the wider highway network.

In view of the scale of the leisure complex and the proposed numbers of parking spaces, it will unlikely be sole use of the dwellings within the red line.

The applicant will be required to provide development and operational details of the leisure complex in the formal submission. Those details shall include who will be using the leisure facilities. The trip generation of the leisure complex shall be assessed when applicable.

### Access

The site will be access via School Road, which is an adopted public highway. The dwellings and leisure complex will be served by circa 4.8m wide access road connecting with School Road, which will be acceptable.

Information on whether or not the site roads will be offered for adoption will need to be supplied. Whatever the case, the road will need to be built to highway standards.

- If the site roads are to be adopted, these will need to be delivered through s38 agreement with the Borough. The Borough will also require agreement on inspection fees and commuted sums. The adoption plans, fees and commuted sums will need to be included in the s106 agreement.
- If the site roads are to remain private, this will also need to be included in a s106 agreement, including details of the management company set up to look after the maintenance of the roads, the Borough's inspection fee and the APC Bond.

The applicant will propose to widen the site access. The details of the access will need to be submitted in the formal application. As part of widening the access, the existing crossover will need to be widened at the applicant's expense.

Forward visibility splays of the site access to the nearside kerb of both directions and 2m x 2m pedestrian visibility at individual driveway shall be assessed in the formal submission.

Footway(s) will be proposed on at least one side of the access road, which will be welcomed. However, the provisions shall align with the borough's highway design guidance with a 2m service margin on both sides of the road up to the junction if dwellings are fronting the site road.

The applicant shall demonstrate that it will be sufficient for emergency vehicles to manoeuvre with the proposed turning head. Highways will expect the swept path of a fire tender using the dimensions below to be submitted:



DB32 Fire Appliance  
Overall Length  
Overall Width  
Overall Body Height  
Min Body Ground Clearance  
Max Track Width  
Lock to Lock Time  
Kerb to Kerb Turning Radius

8.680m  
2.180m  
3.452m  
0.337m  
2.121m  
6.00s  
7.910m

### Parking

According to the WBC Parking Standards, the development of such scale in Urban location will require three allocated driveway parking for each dwelling within the red line boundary, or a minimum of four unallocated parking spaces will be required for the two new dwellings. An additional unallocated visitor parking shall be provided for the residential dwellings. Each parking space shall have minimum dimensions of 5.0m x 2.5m.

While the parking provisions for dwellings cannot be identified from the submissions, it shall be indicated on the block plan in the formal submission. If garage will be proposed to meet the council's car parking requirements, the WBC minimum internal sizes of a single garage for parking are 6m x 3m.

Due to the provisions of 2m service margin on both sides, there could be knock-on effect on the parking provisions to the existing dwelling. The applicant shall ensure that sufficient parking for the existing dwelling to be provided.

According to the WBC Parking Standards, leisure centres and gyms will require one parking space per every 10m<sup>2</sup> public space.

As stated above, the applicant will be required to provide development and operational details of the leisure complex in the formal submission for the Highways to consider if the above standards shall apply to the site.

Nevertheless, the proposed eight spaces for the leisure complex will unlikely be sufficient to meet the operational needs. This may result in overspilt parking at the turning head, which will affect highway safety and will not be acceptable.

### EV Charging Points

Each new dwelling will be expected to provide a minimum of one EV Charging Point under the latest Building Regulations (Approved Document S). This shall be indicated on a plan.

### Cycle Provisions

According to the WBC Parking Standards, three cycle parking allocation will be required per dwelling with 6+ habitable rooms.

The applicant shall indicate direct access to the rear garden, cycle store or garage of suitable sizes for cycle storage on the plan. If the garages will be used to accommodate both the cars and cycles, the sizes of each garage space shall be increased to 6m x 4m / 7m x 3m.

According to the WBC Parking Standards, one short-term cycle parking allocation will be required per 10 per period visitors and one long-term allocation will be required per 5 staff.

As stated above, the applicant will be required to provide development and operational details of the leisure complex in the formal submission for the Highways to consider if the above standards shall apply to the site.

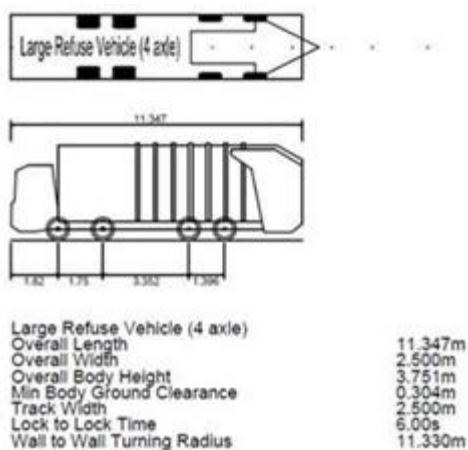
### Refuse Collection Strategy

According to Manual for Streets, the maximum carrying distances for households (30m) and refuse collection operators (25m) from the collection point. Such standards will apply to all residential units within the site.

While kerbside collection is applicable for the existing dwelling, the proposed development will be accessed via private drive off School Road, which will be over 65m from the public highways.

Meanwhile, refuse collection arrangement for commercial uses will be expected for the proposed leisure complex. The applicant shall clarify how refuse collection servicing for the proposed dwellings and leisure complex are going to be provided and submit the swept path analysis of the refuse collection vehicles.

If WBC's residential refuse collection will be applied for the proposed dwelling, the applicant will need to provide the swept path for refuse vehicles entering and leaving the site in forward gear with the following standards:



### Summary

The Highways will not support the proposal due the site being in an unsustainable location.

### **Drainage and Flood Risk:**

The Drainage Officer for this application has issued the following comments.

The site is within flood zone 1 and we would have no objection to the principle of the development, as represented by proposed site plan and section drawing 0058.PRE02 dated September 2024.

As the impermeable footprint of the site increases, we would anticipate seeing a drainage strategy report that addresses 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. A description of how the proposed development will deal with surface water overland flows.
7. Groundwater monitoring confirming seasonal high groundwater levels in the area.
8. 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.
9. Details demonstrating how any SuDS for this development would be managed throughout the lifespan of the development and who will be responsible for maintenance.

### **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.

**Thames Basin Heaths Special Protection Area:**

Policy CP8 of the Core Strategy states that where development is likely to have an effect on the Thames Basin Heaths Special Protection Area (TBH SPA), it is required to demonstrate that adequate measures to avoid and mitigate any potential adverse effects are delivered.

The subject application includes a net increase of 2 dwellings on a site that is within 5km of the TBH SPA. Policy CP8 states that where there is a net increase in dwellings within 5km of the SPA, an Appropriate Assessment is required to be undertaken.

The mitigation measures are outlined in a Section 106 agreement in the form of the provision of Suitable Alternative Natural Greenspace (SANG) at Rocks Nest Wood and a monetary contribution for ongoing monitoring (SAMM). Any subsequent planning permission would be conditional on the completion of this agreement.

**Summary**

The principle of 2no. dwellings and a leisure complex in this location is in conflict with the local plan policies CP1, CP3, CP9 and CP11.

In returning to Paragraph 11 of the NPPF, this outlines the presumption in favour of sustainable development. The three overarching objectives to achieving sustainable development are defined within the NPPF as: economic, social and environmental. The economic role of the NPPF requires proposals to contribute to building a strong, responsive, and competitive economy. The social role requires planning to support strong, vibrant and healthy communities and states that it should create a high quality-built environment. The environmental role states that the natural built and historic environment should be protected and enhanced and should mitigate and adapt to climate change. It is therefore necessary as part of any forthcoming application for the LPA to consider carefully to what degree this proposal would meet the sustainable development goals of the NPPF in terms of its economic, social and environmental roles.

In terms of the matters that weigh in favour of the proposal; the two dwellings proposed would make a contribution, albeit modest, to the housing stock within the district at a time that the Local Planning Authority cannot demonstrate a 4-year housing supply. There would also be a modest economic benefit to a small-scale developer and other tradespersons resulting from the construction period, as well as a further modest benefit from the payment of council tax. However, these are non-specific to the proposal and would come forward with any housing development of this size.

In relation to factors that weigh against the application, the location of the development is within the countryside, outside of, and unconnected to settlement limits, and would have a significant harmful impact on the character and appearance of the area as well as the landscape character. This conflicts with the adopted spatial strategy of the development plan. The site is also located in an unsustainable and poorly accessible location, where future residents would be reliant on private motor vehicles.

In respect of the overall balance, taking account of the information submitted, it is considered that taking all material considerations into account, the proposal would cause a level of harm that would significantly and demonstrably outweigh any identified benefits. At this stage, based on the information presented, the scheme would likely be recommended for refusal.

## Submitting a Planning Application

Once 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,  
James Fuller  
Planning Officer

Authorised by:



12 December 2024