

# Agenda Item 56.

Application Number	Expiry Date	Parish	Ward
203439	12/03/2021	Winnersh	Winnersh;

<b>Applicant</b>	WBC Housing Services, Shute End, Wokingham, RG40 1BN
<b>Site Address</b>	36 and 39-48 Grovelands Park, Winnersh, RG41 5LD
<b>Proposal</b>	Full application for the proposed removal of 12 no. existing mobile homes and the erection of 11 no. two storey pre-fabricated temporary accommodation units consisting of one self-contained two- bedroom housing unit per floor (plots 39-48) and 1 no. single storey mobile house (plot 36).
<b>Type</b>	Full
<b>Officer</b>	Senjuti Manna
<b>Reason for determination by committee</b>	Applicant is Wokingham Borough Council's Housing Services.

<b>FOR CONSIDERATION BY</b>	Planning Committee on Wednesday, 10 February 2021
<b>REPORT PREPARED BY</b>	Assistant Director – Place

<b>SUMMARY</b>
<p>Grovelands Park is a residential mobile home park owned and operated by Wokingham Borough Council. A part of the mobile home park is used by WBC Housing Services to provide temporary emergency accommodation to households, often including children or vulnerable people, while the household waits for permanent accommodation. As such, mobile home units in Grovelands Park not only perform an essential role in the provision of temporary emergency housing, but also its redevelopment would ensure a better environment and quality of accommodation whilst the occupants wait to be re-housed.</p> <p>The proposal includes removal of 12 existing mobile home units on 12 individual plots and replacing them with 23 two-bedroom units in the form of one single storey accessible unit and 11 two storey pre-fabricated units of one self-contained residential accommodation on each floor. Whilst this would result in almost doubling the residential density of this area, since the site is located within a sustainable major development location, it is considered acceptable. The proposal would comply with policies CP2 of the Core Strategy and would be consistent with the intents of policy TB09 of MDD Local Plan and is acceptable in principle.</p> <p>The proposed units would be two storey which would be twice the height of other units of the area. However, it is considered acceptable since the proposal would be sited near the southern end of the larger mobile home park and will not be readily visible from most parts of the public realm due to the presence of existing vegetation. The proposal would retain existing trees and hedges and includes plans to enhance the existing landscaping. As such, the proposal would not have any detrimental impact on the character of the area.</p> <p>The site is located within a sustainable major development location and the proposal includes improvements of existing parking and turning by extending the access road. Disabled parking spaces as well electric vehicle charging points are provided in accordance with the Borough's standards and these are considered acceptable. A flood risk assessment is submitted with the application which has been assessed by the</p>

Council's officers who have not raised any objection subject to a pre-commencement condition securing further details.

The proposed units do not comply with the standards for internal and external residential amenity and as such would not be appropriate for permanent habitation. However, these units are proposed to be for temporary accommodation and it is mentioned in the supporting document that most families will spend between six and nine months at these units. For this reason, the lack of amenity is considered acceptable on balance in this instance subject to a temporary 12 months tenancy period, which is secured by condition 17.

Fire safety information have been provided by the applicant which is considered acceptable subject to the building meeting the current building regulation's fire safety requirements. There are no objections to the proposal in terms of neighbour amenity, environmental health, ecology and archaeology grounds. The application is accordingly recommend for approval subject to conditions for the reasons set out in this report.

#### **PLANNING STATUS**

- Major development location
- Adjacent to designated countryside
- Residential caravan site
- Landfill gas consultation zone
- Flood zones 1 and 2
- Bat roost habitat suitability
- SSSI Risk zone
- Mineral site consultation area

#### **RECOMMENDATION**

**That the committee authorise the GRANT OF PLANNING PERMISSION subject to the following:**

**A. Conditions and informatives:**

**Conditions:**

**1. Timescale**

The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

*Reason: In pursuance of s.91 of the Town and Country Planning Act 1990 (as amended by s.51 of the Planning and Compulsory Purchase Act 2004).*

**2. Approved Details**

This permission is in respect of the submitted application plans and drawings numbered 5651 – (1100D; 1103H; 1202A; 1203; 1204, 1205 and 1206) and drawing titled Section Through GF to FF received by the local planning authority on 10/12/2020 and Design and Access Statement (report reference: 5651-C1-01-F) received by the local planning authority on 20/01/2021. The development shall

be carried out in accordance with the approved details unless other minor variations are agreed in writing after the date of this permission and before implementation with the Local Planning Authority.

*Reason: For the avoidance of doubt and to ensure that the development is carried out in accordance with the application form and associated details hereby approved.*

### **3. External Materials**

Before the development hereby permitted is commenced, samples and details of the materials to be used in the construction of the external surfaces of the building/s shall have first been submitted to and approved in writing by the local planning authority. Development shall not be carried out other than in accordance with the so-approved details.

*Reason: To ensure that the external appearance of the building is satisfactory.  
Relevant policy: Core Strategy policies CP1 and CP3.*

### **4. Privacy Screening**

Prior to the commencement of the development, details of privacy screening including height, design and materials for the first floor staircase landing shall be submitted to and approved in writing from the Local Planning Authority. The approved scheme shall be implemented prior to the first occupation of the development and shall be maintained in the approved form for as long as the development remains on the site.

*Reason: To safeguard the residential amenities of neighbouring properties.  
Relevant policy: Core Strategy policy CP3.*

### **5. Drainage Details**

Prior to the commencement of the development hereby approved a drainage scheme shall be submitted and approved in writing by the Local Planning Authority. The drainage scheme shall include:

- a) A surface water drainage layout drawing showing all proposed pipes, connections, SuDS features and discharge points if there are such.
- b) Identification of the destination of discharge (in accordance with Building Regulation Part H hierarchy) with appropriate justification for the selection with related drawings/sketch and approval for the specific discharge amount if there are such.

The approved scheme shall be implemented prior to the first occupation of the development and shall be maintained in the approved form for as long as the development remains on the site.

*Reason: This is to prevent increased flood risk from surface water run-off.  
Relevant policy: NPPF Section 10 (Meeting the Challenge of Climate Change,*

## **6. Contamination**

Unless otherwise agreed by the Local Planning Authority, development other than that required to be carried out as part of an approved scheme of remediation must not commence until parts A) to D) (below) have been complied with. If unexpected contamination is found after development has begun, development must be halted on that part of the site affected by the unexpected contamination to the extent specified by the Local Planning Authority in writing until part D of the condition has been complied with in relation to that contamination.

### **A) Site Characterisation:**

An investigation and risk assessment, in addition to any assessment provided with the planning application, must be completed in accordance with a scheme to assess the nature and extent of any contamination on the site, whether or not it originates on the site. The contents of the scheme are subject to the approval in writing of the Local Planning Authority. The investigation and risk assessment must be undertaken by competent persons and a written report of the findings must be produced. The written report is subject to the approval in writing of the Local Planning Authority. The report of the findings must include:

- (i) a survey of the extent, scale and nature of contamination;
- (ii) an assessment of the potential risks to:
  - human health,
  - property (existing or proposed) including buildings, crops, livestock, pets, woodland and service lines and pipes,
  - adjoining land,
  - groundwaters and surface waters,
  - ecological systems,
  - archeological sites and ancient monuments;
- (iii) an appraisal of remedial options, and proposal of the preferred option(s).

This must be conducted in accordance with DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11'.

### **B) Submission of Remediation Scheme**

A detailed remediation scheme to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and the natural and historical environment must be prepared, and is subject to the approval in writing of the Local Planning Authority. The scheme must include all works to be undertaken, proposed remediation objectives and remediation criteria, timetable of works and site management procedures. The scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.

### **C) Implementation of Approved Remediation Scheme**

The approved remediation scheme must be carried out in accordance with its terms prior to the commencement of development other than that required to carry out remediation, unless otherwise agreed in writing by the Local Planning Authority. The Local Planning Authority must be given two weeks written notification of commencement of the remediation scheme works.

Following completion of measures identified in the approved remediation scheme, a verification report that demonstrates the effectiveness of the remediation carried out must be produced, and is subject to the approval in writing of the Local Planning Authority.

#### D) Reporting of Unexpected Contamination

In the event that contamination is found at any time when carrying out the approved development that was not previously identified it must be reported in writing immediately to the Local Planning Authority. An investigation and risk assessment must be undertaken in accordance with the requirements of part A), and where remediation is necessary a remediation scheme must be prepared in accordance with the requirements of part B), which is subject to the approval in writing of the Local Planning Authority.

Following completion of measures identified in the approved remediation scheme a verification report must be prepared, which is subject to the approval in writing of the Local Planning Authority in accordance with part C).

*Reason: To ensure that risks from land contamination to the future users of the land are minimised. Relevant policies: NPPF Section 15 (Conserving and Enhancing the Natural Environment) and Core Strategy policies CP1 & CP3.*

### 7. **Noise control**

Before the development hereby permitted commences a scheme shall be submitted to and approved in writing by the local planning authority which specifies the provisions to be made for the control of noise emanating from the first floor units and external staircases and the approved scheme shall be fully implemented prior to the occupation of the building(s).

*Reason: To protect the occupiers of nearby premises from unreasonable noise levels. Relevant policy: Core Strategy policies CP1 and CP3 and Managing Development Delivery Local Plan policy CC06.*

### 8. **Foundation Design**

No development or other operations shall take place until a pile and beam foundation design has been submitted to the local planning authority for approval, in order to prevent damage to the adjacent off-site trees.

*Reason: In the interests of the amenity and landscape character of the area. Relevant policy: Core Strategy policy CP3 and Managing Development Delivery Local Plan policies CC03 and TB21.*

## 9. Protection of Trees

- a) No development or other operations shall take place except in complete accordance with the Arboricultural Impact Assessment and Method Statement and associated Tree Protection Plan reference 370/01A (hereinafter referred to as the Approved Scheme).
- b) No operations shall commence on site in connection with development hereby approved (including any tree felling, tree pruning, demolition works, soil moving, temporary access construction and or widening or any other operation involving use of motorised vehicles or construction machinery) until the tree protection works required by the Approved Scheme are in place on site.
- c) No excavations for services, storage of materials or machinery, parking of vehicles, deposit or excavation of soil or rubble, lighting of fires or disposal of liquids shall take place within an area designated as being fenced off or otherwise protected in the Approved Scheme.
- d) The fencing or other works which are part of the Approved Scheme shall not be moved or removed, temporarily or otherwise, until all works including external works have been completed and all equipment, machinery and surplus materials removed from the site, unless the prior approval in writing of the local planning authority has first been sought and obtained.

*Reason: To secure the protection throughout the time that the development is being carried out of trees shrubs or hedges growing within or adjacent to the site which are of amenity value to the area, and to allow for verification by the local planning authority that the necessary measures are in place before development and other works commence Relevant policy: Core Strategy policy CP3 and Managing Development Delivery Local Plan policies CC03 and TB21.*

## 10. Landscaping

Planting shall be carried out in accordance with the landscape details as shown on the Drawing No. Tree and Shrub Planting Proposals 370/04 dated 8.12.2020 and Drawing No. 5651-1104 Proposed Hard Landscaping and Boundary Treatments dated Jan 2021 in the first planting and seeding seasons following the occupation of the building(s).

Any trees or plants which, within a period of 5 years from the date of the planting (or within a period of 5 years of the occupation of the buildings in the case of retained trees and shrubs) die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species or otherwise as approved in writing by the local planning authority.

*Reason: To ensure adequate planting in the interests of visual amenity. Relevant policy: Core Strategy policy CP3 and Managing Development Delivery Local Plan policies CC03 and TB21.*

## 11. Retention of Trees and Shrubs

No trees, shrubs or hedges within the site which are shown as being retained on the Drawing No. 370/01 Rev. A dated 18.1.2021 – Tree Survey, Constraints and Protection Plan shall be felled, uprooted wilfully damaged or destroyed, cut back in any way or removed without previous written consent of the local planning authority; any trees, shrubs or hedges removed without consent or dying or being severely damaged or becoming seriously diseased within 5 years from the completion of the development hereby permitted shall be replaced with trees, shrubs or hedge plants of similar size and species unless the local planning authority gives written consent to any variation.

*Reason: To secure the protection throughout the time that development is being carried out, of trees, shrubs and hedges growing within the site which are of amenity value to the area. Relevant policy: Core Strategy policy CP3 and Managing Development Delivery Local Plan policies CC03 and TB21.*

## **12. Electric Vehicle Charging Details**

Prior to the occupation of the development hereby permitted, details for Electric Vehicle Charging points serving the development shall be submitted to and approved in writing by the Local Planning Authority. The Electric Vehicle Charging points shall be implemented in accordance with such details as may be approved and shall be permanently retained in the approved form for the charging of electric vehicles and used for no other purpose.

*Reason: In order to ensure that secure electric vehicle charging facilities are provided so as to encourage the use of sustainable modes of travel. Relevant policy: Core Strategy policies CP1, CP3 & CP6 and Managing Development Delivery Local Plan policy CC07.*

## **13. Parking and Turning**

The development hereby permitted shall not be occupied until the vehicle parking and turning space has been provided in accordance with the approved plans. The vehicle parking and turning space shall be retained and maintained in accordance with the approved details and the parking space shall remain available for the parking of vehicles at all times and the turning space shall not be used for any other purpose other than vehicle turning.

*Reason: To provide adequate off-street vehicle parking and turning space and to allow vehicles to enter and leave the site in a forward gear in the interests of road safety and convenience and providing a functional, accessible and safe development and in the interests of amenity. Relevant policy: Core Strategy policies CP3 & CP6 and Managing Development Delivery Local Plan policy CC07.*

## **14. Cycle Parking**

No building shall be occupied until details of secure and covered bicycle storage/ parking facilities for the occupants of [and visitors to] the development shall be submitted to and approved in writing by the local planning authority. The cycle storage/ parking shall be implemented in accordance with such details and shall be permanently retained in the approved form for the parking of bicycles and used for no other purpose.

*Reason: In order to ensure that secure weather-proof bicycle parking facilities are provided so as to encourage the use of sustainable modes of travel. Relevant policy: NPPF Section 9 (Sustainable Transport) and Core Strategy policies CP1, CP3 & CP6 and Managing Development Delivery Local Plan policy CC07.*

**15. Bin Store**

No building shall be occupied until the bin storage area/ facilities have been provided in full accordance with the approved details. The bin storage area and facilities shall be permanently so-retained and used for no purpose other than the temporary storage of refuse and recyclable materials.

*Reason: In the interests of visual and neighbouring amenities and functional development. Relevant policy: Core Strategy CP3 and Managing Development Delivery Local Plan policy CC04.*

**16. Obscure Glazing**

The first floor windows in the west elevations of units 44a, 45, 46 and 47 shall be fitted with obscured glass and shall be permanently so-retained. The window shall be non-opening unless the parts of the window which can be opened are more than 1.7 metres above the finished floor level of the room in which the window is installed and shall be permanently so-retained.

*Reason: To safeguard the residential amenities of neighbouring properties. Relevant policy: Core Strategy policy CP3*

**17. Temporary Permission**

Except for unit 36, all other units hereby permitted shall be occupied by a particular tenant (family or individual) for a maximum period of 12 months only, unless agreed otherwise in writing by the Local Planning Authority.

*Reason: The type of building is not one that the local planning authority is prepared to approve other than for a limited occupancy period, having regard to the size, materials and type of structure proposed. Relevant policy: Core Strategy policies CP1 and CP3.*

**Informatives:**

**1. Pre-commencement conditions**

The applicant is reminded that this approval is granted subject to conditions which must be complied with prior to the development starting on site. Commencement of the development without complying with the pre-commencement requirements may be outside the terms of this permission and liable to enforcement action. The information required should be formally submitted to the Council for consideration with the relevant fee. Once the details have been approved in writing the development should be carried out only in accordance with those details. If this is not clear please contact the case officer to discuss.

## **2. Fire safety**

The applicant is reminded that the development will need to be designed and built in accordance with the fire safety standards of current Building Regulation requirements. Relevant information is available in the following web link: <https://www.gov.uk/government/publications/fire-safety-approved-document-b>. Full assessment of the proposed development in respect of 'Building Control' matters will be undertaken during the formal statutory Building Regulations consultation.

## **3. Thames Water**

Records indicate presence of public sewers and water mains beneath or in close proximity to the proposed development. In order to protect public sewers and water mains and to ensure that Thames Water can gain access to those sewers and mains for future repair and maintenance, approval must be sought from Thames Water where the erection of a building or an extension to a building or underpinning work would be over the line of, or would come within 3 metres of, a public sewer or a water main. Thames Water will usually refuse such approval in respect of the construction of new buildings, but approval may be granted in some cases for extensions to existing buildings. The applicant is advised to contact Thames Water Developer Services on 0845 850 2777 to discuss the options available at this site.

## **4. CIL Liable Development**

The development hereby permitted is liable to pay the Community Infrastructure Levy. The Liability Notice issued by Wokingham Borough Council will state the current chargeable amount. A revised Liability Notice will be issued if this amount changes. Anyone can formally assume liability to pay, but if no one does so then liability will rest with the landowner. There are certain legal requirements that must be complied with. For instance, whoever will pay the levy must submit an Assumption of Liability form and a Commencement Notice to Wokingham Borough Council prior to commencement of development. For more information see - <http://www.wokingham.gov.uk/planning/developers/cil/cil-processes/>

## **5. Positive and Proactive Discussion**

The Local Planning Authority has acted positively and proactively in determining this application by assessing the proposal against all material considerations, including planning policies and any representations that may have been received. This planning application has been the subject of positive and proactive discussions with the applicant in terms of:

- a full pre-application process was undertaken by the applicant;
- amended plans being submitted by the applicant to overcome concerns relating to Trees and Landscape and Highway Safety.

The decision to grant planning permission in accordance with the presumption in favour of sustainable development as set out in the NPPF is considered to be a positive outcome of these discussions.

<b>PLANNING HISTORY</b>		
<b>Application Number</b>	<b>Proposal</b>	<b>Decision</b>
F/2004/2329	Proposed replacement of 2 mobile homes with 3 new ones.	Approved 01/12/2004
B/2/61	Site to accommodate 80 caravans, 56 garages	Approved 12/07/1961
B/17/59	Site to be used for stationing of caravans	Approved 10/02/1960

<b>SUMMARY INFORMATION</b>	
<b>For Residential</b>	
Site Area	0.42 hectares
Existing units	12
Proposed units	23
Previous land use	Residential Caravan Park
Proposed Public Open Space	N/A
Existing parking spaces	14
Proposed parking spaces	23

<b>CONSULTATION RESPONSES</b>	
Crime Prevention Design Officer	No comments received
Royal Berkshire Fire and Rescue	No comments received
Thames Water	No objections subject to informative
WBC Biodiversity	No comments received
WBC Economic Prosperity and Place (Community Infrastructure)	Support the application
WBC Drainage	No objections subject to condition 5
WBC Education (School Place Planning)	No comments received
WBC Environmental Health	No objection subject to condition 6
WBC Highways	No objection subject to conditions 12, 13 and 14
WBC Tree & Landscape	No objection subject to conditions 8, 9, 10 and 11
WBC Cleaner & Greener (Waste Services)	No objection subject to condition 15
WBC Growth and Delivery (Planning Policy)	No objections

<b>REPRESENTATIONS</b>
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**Town/Parish Council:** **Winnersh Parish Council**: Objected to the proposal on following grounds:

- The site is a mobile home park with single story mobile homes, the proposed new 2 story prefabricated ones are out of character and will look unsightly.
- The existing sewage system is not fit for purpose currently, it constantly fails and would not cope with a further 11 homes.
- The proposed 2 storey dwellings will overlook the existing properties.

- The plans show the proposed dwellings have a single access point which is a potential fire risk.

**Local Members: Cllr Paul Fishwick** has objected to the proposal on following grounds:

- The two storey units would appear out of character within the wider Grovelands Park area which include only single storey units.
- The existing sewage system and pumping station are not fit for purpose for the existing residents and adding more homes to this failing system will create further issues for its residents.

**Officer's note:** The two storey units would be located at the furthest side of the area and would not be readily visible from majority of the caravan park.

The WBC Drainage Officer has reviewed the Flood Risk and Drainage Assessment report submitted with the application and has not raised any objection subject to a condition securing further details.

The possible point of overlooking is from the proposed landing of the external staircase. Any use of the external staircase landing is likely to be brief – used only for accessing the first floor unit. Notwithstanding, a condition is included to secure privacy screening for the landing to minimise overlooking.

The applicant has provided details of fire safety measures within the proposed units. Informative 2 is included to remind the applicant that the proposed development would have to meet the building regulations safety standards.

**Neighbours:** 12 residents of Grovelands Park (unite numbers 1, 9, 10, 11, 34, 35, 37, 38, 40, 50, 55 and one unspecified unit number) and 1 resident from 2 Carpenters Close, Woodley have objected to the proposal on following grounds:

- **Caravan Park requirements:** The site falls within a caravan park and therefore the proposal must adhere to the mobile homes act 1983. These units would have heights more than what is allowed by the legal definition of caravans.

**Officer's note:** Proposed two storey units are not considered as caravans. They have been described as 'two-storey prefabricated temporary accommodation units'. A planning permission would result in change of use of this part of the park into residential.

- **Fire safety:** These units are inadequate in terms of fire safety since they do not have two doors. Mobile homes catch fire and burn in 5-8 minutes.

**Officer's note:** See comment above regarding fire safety.

- **Sewage/Drainage issues:** The existing sewage and drainage systems are inadequate and the area experiences regular sewage problems. The sewage system is owned by WBC and maintenance of the pumping station as well as drainage infrastructure is extremely poor. The drainage infrastructure is already inadequate for the existing units – adding 11 more family units will cause further problems. These have not been addressed appropriately in the FRA report.

**Officer's note:** See comment above regarding drainage.

- **Two storey units:** These would appear out of character. These units would not be stable against high cross-winds. The poor quality of existing ground conditions would not allow for strong foundations and these units would be unsafe to live in. The existing units are not maintained well by WBC and if similar lack of maintenance continue, these two storey units would appear unsightly. The existing units are damp and lack proper insulation. It would be better to replace the existing units with more energy efficient units rather than two storey units.

**Officer's note:** These units would be located at the furthest side of the park and would not be visible from most areas due to the presence of existing trees and vegetation. Building and fire safety requirements would have to be in accordance with building regulations.

- **Impact on neighbouring amenity:** The proposed two storey units would have loss of light, overlooking and overbearing impacts on neighbouring single storey units. Due to their southern location, these units would have detrimental loss of light impact particularly on existing units 38 and 53.

**Officer's note:** These units would have acceptable neighbour impact, see neighbour amenity section (paragraphs 19 – 27) below.

- **Lack of outdoor amenity:** With 11 additional families, where children are expected to live, there is no outdoor amenity area for them to play. These units themselves lack rear amenity space and no ball game is allowed on the common greenspace.

**Officer's note:** These units would be used for temporary emergency accommodation. For this reason, private amenity space to meet standards is not considered essential.

- **Trees and Landscape:** The proposal would result in damaging some of the existing trees, resulting in harm to the area's visual amenity.

**Officer's note:** The application is supported by detailed arboricultural reports. The WBC Trees and Landscape Officers have reviewed the submitted information and raised no objection subject to conditions including appropriate foundation design and protection of trees.

- **Parking:** There is an existing problem with parking within the site and additional 11 units would cause further problems.

**Officer's note:** The applicant has provided parking information demonstrating policy compliant parking spaces including two disabled spaces and electric vehicle charging point.

- **De-valuing of permanent units:** The proposal would result in devaluing of permanent units which are maintained by mobile home owners. Additionally, permanent home owners are not allowed to add a second storey to their mobile homes but the Council is proposing two storey units on their side, which is unfair.

**Officer's note:** Loss of property value is not a material consideration in planning.

- **Antisocial behaviours:** This section of Grovelands Park is used as emergency temporary accommodation, which is different from the rest of the park where permanent residents live. Residents of the application site often demonstrate anti-social behaviours and adding more units of similar nature would cause additional problems. Some of the future occupiers would be drug addicts and existing park users have children. It will not be safe to accommodate them together in the same area. Lack of proper sound insulation would result in ground floor units being disturbed by the occupants of upper storey units.

**Officer's note:** Whilst anti-social behaviour by others can cause some annoyance, there is no evidence that the occupants of the development would cause a rise in incidents. Noise mitigation measures are secured using a condition.

<b>APPLICANTS POINTS</b>	
•	Wokingham homelessness and extreme housing need are fast-growing issues and the proposal would contribute in addressing them.
•	Most families housed in these units will spend between six and nine months at the facility and so over a year the scheme could help up to 46 households per annum.
•	The proposal would comply with policy CP2 of the Core Strategy which requires proposals to meet community need.
•	The proposal would result in doubling the residential density of this part of the park. However, the site falls within a major development location and additional density would be acceptable here.
•	All new units would be sited on the footprint of the existing units as closely as possible. The proposal would have no detrimental impact on levels of daylight in the habitable rooms of adjoining properties.
•	The proposal would comply with the intents of policy TB09 of MDD Local Plan which supports residential accommodation for vulnerable groups.
•	Existing units were designed as holiday homes, thus not purposed for long-term habitation. They are thermally inefficient causing additional hardship for already vulnerable families.
•	All plots have been provided with bins and cycle storage areas.
•	Additional landscaping is proposed for the site to achieve the sense of integration and sense of place echoed in Policy CP3.
•	The modules will be manufactured off-site contributing to a greener and sustainable construction.
•	The Modular design adopts a passive fire protection approach to protect the internal elements of the building in accordance with current building regulations.

<b>PLANNING POLICY</b>		
National Policy	<b>NPPF</b>	National Planning Policy Framework
Adopted Core Strategy DPD 2010	<b>CP1</b>	Sustainable Development
	<b>CP2</b>	Inclusive Communities
	<b>CP3</b>	General Principles for Development
	<b>CP5</b>	Housing mix, density and affordability
	<b>CP6</b>	Managing Travel Demand
	<b>CP9</b>	Scale and Location of Development Proposals

Adopted Managing Development Delivery Local Plan 2014	<b>CC01</b>	Presumption in Favour of Sustainable Development
	<b>CC02</b>	Development Limits
	<b>CC03</b>	Green Infrastructure, Trees and Landscaping
	<b>CC04</b>	Sustainable Design and Construction
	<b>CC06</b>	Noise
	<b>CC07</b>	Parking
	<b>CC09</b>	Development and Flood Risk (from all sources)
	<b>CC10</b>	Sustainable Drainage
	<b>TB05</b>	Housing Mix
	<b>TB07</b>	Internal Space standards
	<b>TB09</b>	Residential accommodation for vulnerable groups
	<b>TB21</b>	Landscape Character
Supplementary Planning Documents (SPD)	<b>BDG</b>	Borough Design Guide – Section 4
		DCLG – National Internal Space Standards
		CIL Guidance

## PLANNING ISSUES

### Description of Development:

1. The application is for the proposed replacement of 12 existing single storey mobile homes, located on 12 individual plots within a larger residential caravan park, with 11 two storey and 1 single storey temporary units of accommodation. The two storey units would consist of a separate two-bedroom housing unit per floor. Therefore, a total of 23 units are proposed to replace the existing 12.
2. The single storey unit (no. 36) would be a two-bedroom Category 3 Part M wheelchair user dwelling, designed in accordance with Part M of the Building Regulations to meet required internal space. The unit will have a dimension of 15m x 4.3m x 3m (internal height) that would comply with the legal definition of a caravan. This unit would have its own private parking space in the front garden.
3. The 11 no. two storey pre-fabricated units (no. 39 – 48) would be 14.5m (length) x 4.25m (width) x 6m (height) in dimension and would contain one no. two-bedroom self-contained residential unit in each floor, thus totalling 22 units. The first floor units would be accessed by an external metal staircase.
4. The proposal also includes an extension of the existing access road to include additional parking and turning areas and additional landscaping.

## Principle of Development:

5. The National Planning Policy Framework has an underlying presumption in favour of sustainable development which is carried through to the local Development Plan. The Managing Development Delivery Local Plan (MDD) Policy CC01 states that planning applications that accord with the policies in the Development Plan for Wokingham Borough will be approved without delay, unless material considerations indicate otherwise.
6. The site is located within the built-up area of Winnersh, identified as a Major Development Location in Core Strategy Policy CP9 (Scale and location of development proposals) and Policy CC02 (Development Limits) of the Managing Development Delivery (MDD) Local Plan. Development in this location is acceptable in principle providing it is of an appropriate scale and character, and accords with the relevant policies set out in the wider development plan and national policy as a whole.
7. Additionally, proposals would comprise the use of previously developed land, which is supported by local and national policy. Section 11 of the NPPF refers to making effective use of land in meeting the need for homes and other uses. Among other considerations, paragraph 118 e) states that planning policies and decisions should: *“support opportunities to use the airspace above existing residential and commercial premises for new homes. In particular, they should allow upward extensions where the development would be consistent with the prevailing height and form of neighbouring properties and the overall street scene, is well designed (including complying with any local design policies and standards), and can maintain safe access and egress for occupiers.”*
8. Though the proposed 2 storey units would be replacing existing units rather than extending them upwards, the proposals would broadly result in more effective use of existing PDL. Therefore, subject to character and other impacts, the principle of the proposals is supported by this aspect of national policy.
9. Policy CP6 of the Core Strategy seeks to ensure that travel demand is managed. The proposal site is a sustainable location since it is located within 0.8 miles of Winnersh Station and a bus stop on Robin Hood Lane. It is also within walking distance from primary and secondary schools. There is no objection to the proposed development on sustainability grounds.

### Housing need

10. The site is an existing residential caravan park consisting of homes originally designed as holiday homes. These mobile homes have been used to provide temporary accommodation for homeless households but are not fit for purpose. The replacement pre-fabricated units will have a higher standard of construction and so the proposals are intended to provide greater quality as well as quantity of accommodation. The supporting documentation sets out that the proposals are required to satisfy the Council's statutory duties to accommodate homeless households, particularly those with vulnerable children. It would remove the current reliance on expensive nightly paid B&B accommodation, which is typically out of Borough, as temporary accommodation.
11. The Wokingham Council's development plan and supporting evidence is silent on residential accommodation that is specifically for homeless people or accommodation

of a temporary nature. However, a number of policies broadly support the proposals. Core Strategy Policy CP2 relates to inclusive communities. As is clarified in supporting paragraph 4.15, this policy recognises that to achieve sustainable development “*it is important that the needs of all sections of the population are met through development*”. CP2 states that “*planning permission will be granted for proposals that address the requirements of... b) children, young people and families, including the co-ordination of services to meet their needs.*” The proposed per-fabricated units are designed with multiple rooms to accommodate families with children; therefore the development appears consistent with CP2.

12. Similarly, MDD policy TB09 relates to residential accommodation for vulnerable groups. The development plan does not provide a definition of the term ‘vulnerable’ and it is noted that the policy relates specifically to provision for elderly residents and adults and children in care. However, it is considered reasonable that homeless individuals would fall under a common sense definition of vulnerable and therefore the thrust of this policy would broadly support housing provision to address those needs.
13. Overall, the proposed development is for a demonstrable short term need for a distinct vulnerable group and is therefore consistent with the broad aims of these policies. For the reasons mentioned above, the proposal is considered acceptable in principle. However, the proposed units are substandard in terms of internal and external amenities of the future occupiers. To overcome these issues, the proposal would clearly have to be for temporary accommodation and would have to be controlled by a planning condition to restrict the length of stay. It is considered that any tenancy of more than 12 months could result in harm to the amenity of the occupiers and condition 17 is included to secure this.

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

14. The proposal includes erection of two storey pre-fabricated units with external staircases. These units would be externally finished with timber cladding and would have single ply flat roof with felt top. Due to the nature of the proposed units, which do not fall within the legal definition of caravan, this section of the larger caravan park would result in change of use from residential caravan park to residential. However, this change of use would not be significantly dissimilar from the existing use and as such would not have any additional impact.
15. These units would be twice the height of the other units within the area and would therefore be prominent within this section of the park. Objections have been received from the Parish Council as well as from neighbouring residents relating to the out of character appearance of these units. The proposal is considered to not have any detrimental impact on the character of the area, which is predominantly residential, since these units would have visually similar external finishes to other timber lodges within the park. Moreover, this section of the mobile home park is sited near the edge of the park area and is not readily visible from majority of public realm. The two storey units would be sited predominantly on the footprint of the existing units and would not significantly impact the existing building lines or pattern of units. For this reason, the additional height of these prefabricated units are not considered to appear an intrusive feature within the existing street scene and would not have detrimental impact on the character of the area.

16. The proposal would replace 12 existing units with 23 units, thus almost doubling the residential density of the area. However, the proposal site falls within a major development location and because of this, an increased residential density will not result in detrimental impact on character of the area.
17. This section of Grovelands Park includes existing trees and hedgerows along the field boundary adjacent to the site and marks the edge of the settlement boundary. These vegetation also contribute to the visual character of the area when viewed from the countryside. Whilst some of the two storey units would be visible from the open fields to the south, it is not considered to have any detrimental impact as long as the existing vegetation is protected and retained. This is discussed further in the trees and landscape section below.
18. Overall, the proposal is considered to not have a significant detrimental impact on the character of the area warranting a refusal.

### **Residential Amenities:**

19. Policy CP3 of the Core Strategy aims to protect neighbouring amenity and R23 of the Borough Design Guide SPD requires that extensions relate to neighbouring properties.
20. **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. It is to be noted that these standards are set for residential developments that are to be used for permanent occupancy where privacy of the rear amenity space is the primary concern. The current application is for emergency temporary occupation and there are no development plan policies for these types of developments. Notwithstanding, the two storey units are designed to maintain privacy for both the future occupiers of the development as well as for neighbouring residential amenity.
21. The proposed two storey units have been designed such that all habitable windows are located on southern elevations – thus minimising mutual overlooking. The northern elevations include the main entrance door and staircase landing which can have potential overlooking. Whilst it is considered that the nature of use of the landing would be brief – only to gain access into the unit, nonetheless, condition 4 is included securing privacy screening for the landing to minimise any overlooking impact.
22. Objections have been received from residents of neighbouring properties on overlooking impact of the proposal, particularly arising from the external staircase and first floor side windows of some of the units. First floor eastern windows of units 39 – 43 would have an outlook towards Emm Brook and would not have any loss of privacy impact on neighbouring properties, particularly on no. 38 Grovelands Park. The Borough Design Guide SPD requires 10m front-to-front separation for visual privacy. First floor road facing windows of all units would have appropriate separation from units across the road and would not have additional overlooking impact. It is considered that due to their location, first floor western windows of units 44a, 45, 46 and 47 could have a degree of overlooking on neighbouring properties. Since these windows are secondary windows to a habitable room, it is considered reasonable to condition these windows to remain obscure glazed and non-opening up to 1.7 m above the finished floor level of the room (condition 16) to minimise additional overlooking impact.

23. **Sunlight and Daylight:** 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. The two storey units are not considered to have any detrimental impact on the sunlight and daylight of neighbouring units since these would mostly maintain a mutual 6m separation.
24. Objections have been received from neighbouring properties 38 Grovelands Park on loss of light grounds since the two storey units will be located to the southern side of this single storey unit. Unit 38 would be located 6.9m from the two storey unit at plot 39. This is an acceptable separation distance and no harmful loss of light impact is considered to occur. Similarly, unit 47 would not result in loss of light impact on neighbouring property no. 53 since these units will be separated by more than 8m.
25. **Overbearing and Sense of Enclosure:** Except for the separation between unit 44 and 48, the proposed two storey units would maintain 6m or above separation from neighbouring units on all sides and as such the proposal would not have any overbearing impact on neighbouring amenity. Whilst the separation between units 44 and 48 would be 2.5m, it is more than the Borough Design Guide SPD recommended 2m flank-to-flank separation and as such, the proposal is not considered to have overbearing impact.
26. **Noise disturbance:** Policy CC06 and Appendix 1 of the MDD Local Plan requires that development protect noise sensitive receptors from noise impact. The proposed units could result in noise disturbance, particularly for the ground floor units since prefabricated units may not have sufficient noise insulation for the ceiling. Additionally, the external metal staircase would produce noise when in use, especially during late evenings when ambient noise level would be lower.
27. The proposal includes first floor units and external metal staircases which can result in potential noise disturbances to neighbouring properties. A sectional drawing has been submitted to demonstrate acoustic insulation between flats on both floors of the two storey units, and no objection has been raised by Environmental Health. However, since no technical information has been provided, it is considered reasonable to include a condition securing noise mitigation measures (condition 7).

### **Landscape and Trees:**

28. 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 and Policy TB21 requires consideration of the landscape character.
29. The site is located on the settlement edge of Winnersh next to the countryside with expansive views across fields toward the Emm Brook river corridor. The site is located in Landscape Character Area J1 – Wokingham Winnersh Settled and Farmed Clay. The static homes proposed for replacement are located at the south-eastern end of the site which backs onto an area known as Maidensfield, consisting of open agricultural fields and remnant hedgerows. The application site itself includes existing trees and hedgerows along the field boundary adjacent to the site and marks the line of the settlement area. The vegetation plays an important part in the area's visual amenity and contributes positively to the character of the area.

30. An Arboricultural Implications Assessment and Method Statement has been submitted that assesses the condition of the trees and recommends tree works that are acceptable and these works should be carried out prior to the contractor taking possession of the site. This is secured using condition 9. The assessed trees are located between the plots, and along the boundaries and proposals do not include any felling of trees but adhere to the recommendations contained in BS5837:2012 for avoidance as far as possible. This approach is appropriate and there is no objection to the proposal on tree protection grounds.
31. There are minor conflicts with tree Root Protection Area (RPA) for units 40, 41, 44A and 48 which can be avoided using appropriate foundation design. A pre-commencement condition (no. 8) is included to secure these details to avoid any unwanted impact on existing trees.
32. The proposal includes additional hard and soft landscaping and boundary treatment. The WBC Trees and Landscape Officer has reviewed the proposal and has not raised any objection subject to condition 10 securing their implementation.

#### **Access and Movement:**

33. 11 additional units would not have significant impact on existing highways network. The proposal does not include any alteration to the existing access road other than a southern extension to accommodate additional parking and turning spaces. This is considered acceptable.

#### **Parking:**

34. The proposal includes 1 allocated and 22 unallocated parking spaces which exceeds Borough's parking standard by 7. All parking spaces are 5m x 2.5m which is acceptable. Proposed parking includes disabled spaces and electric vehicle charging points which meet the Borough's standard. Condition 12 is included to secure electric vehicle charging details and condition 13 secures permanent retention of the proposed parking and turning areas.
35. Cycle Parking is proposed to be provided for each unit which is acceptable. However, since no details of the storage units are provided, condition 14 is included to secure this.

#### **Construction Management:**

36. A construction health and safety plan is provided with the application which is considered acceptable and there is no objection to the proposal on highway safety grounds.

#### **Flooding and Drainage:**

37. The main section of the proposed development is in Flood Zone 1 with low risk of surface water flooding according to the EA mapping with a small eastern section in Flood Zone 2.

38. Detailed Flood Risk Assessment dated December 2020 has been provided with the application. The FRA provides information on:
- a) Details of how surface water runoff will be collected and dealt with from the proposed development have been presented and described including existing and proposed methods. (Sections 4.1, 4.2 and 5)
  - b) A flood risk assessment is shown for all forms of flooding and it is stated that the proposal is likely to improve the flood risk management by employing the SuDS Hierarchy. (sections 3)
  - c) Soil infiltration results demonstrating whether the achievability has been presented. (Appendix C).
  - d) MicroDrainage calculations in Appendix F for the proposed drainage strategy including 1 to 100 storm rain return period.
  - e) Detailed drawing with all the features and elements on the site including existing drainage presented in Appendix B.
39. The WBC Flooding and Drainage Officer has reviewed the FRA and has not raised any objection in principle to the proposed development. However, since a proposed drainage plan/layout has not been provided and additional information and justification for the disposal to the existing water course has not been shown, condition 5 is included to secure these details.
40. Objections have been received on lack of sewage management grounds. The WBC Drainage Officer has commented that most of the existing problems are likely to be the result of poor infrastructure which can cause congestion and may lead to flooding on the road during heavy rains. It is stated on the Application Form that surface water will be managed via Sustainable Drainage System and also existing watercourse disposal, but there is no proposed drainage methods or systems in the documentation. For this reason, condition 5 is included as a pre-commencement condition to ensure no additional flood risk from the proposed development.

### **Environmental Health:**

#### Contamination:

41. A phase 2 Site Investigation Report (Your Environment Report RefYE989 dated June 2020) has been submitted with the application. The report identifies some contamination at depths likely to be encountered by future site users/occupiers and the level of risk is assessed to be moderate. Recommendations are made regarding the potential risk to site workers during construction.
42. The report recommends a remediation strategy for the eastern portion of the site across entire area of soft landscaping which involves removal of soil to 600mm depth, provision of a geotextile barrier and reinstatement with clean material. The report proposes an alternative remediation strategy to concrete over the areas proposed for /soft landscaping to provide a capping later. No risk from ground gas is identified so no gas protection measures are required.

43. The WBC Environmental Health Officer has reviewed the submitted information and has not raised any objection to the proposal subject to condition 6 to secure remediation strategy followed by validation when the approved works have been completed. The condition also makes provision for the discovery of unexpected contamination.

**Amenity Space for future occupiers:**

44. The proposal is for the erection of 23 two-bedroom temporary accommodation units in the form of 11 no. two storey pre-fabricated units and 1 no. single storey mobile home unit. The single storey unit would replace a similar unit at the same location and there is no objection to this aspect of the proposed development.
45. The two storey pre-fabricated units would not fall within the legal definition of caravans and as such should be considered as residential units. 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 for all residential development. The rear amenity should be private, should receive direct sunlight and be capable of accommodating play, clothes drying and storage.
46. Whilst each unit has its allocated drying areas, they do not have adequate private amenity spaces, particularly for units 44 and 44a. The complete lack of any amenity area, either in front or back, makes these units unacceptable for long term occupation. However, since these units would be for short term needs and non-permanent accommodation, the non-compliance with policy is considered acceptable. These units would provide much needed solution for homelessness and it is considered that subject to a condition restricting the occupation of each unit to a maximum of 12 months tenancy, the lack of external amenity can be considered acceptable.

**Internal Space Standards:**

47. Policy TB07 of the MDD and R17 of the SPD require adequate internal space to ensure the layout and size achieves good internal amenity. In accordance with the Technical housing standards – nationally described space standard, a minimum standard of 61 sq. m applies for 1 storey 2 bedroom 3 person occupancy flats. A dwelling with more than one bedroom should have a main bedroom, which is to have a minimum area of 11.5 sq. m. Secondary of single bedrooms should have a minimum area of 7.5 sq. m. There should also be provision for storage.
48. Whilst the proposed units would comply with the internal space standards for each bedroom, the total internal area would be less than the area required for 2 bedroom 4 person occupancy flats. Additionally, policy TB07 of MDD Local Plan requires a 4 person unit to have a minimum combined floor area of living, dining and kitchen space of 27 sq. m. The proposed units would have a combined living, dining and kitchen space of 21.7 sq. m which would be less than the required standard. However, since these units would be for short term needs and non-permanent accommodation, no objection is raised, subject to condition 14 to ensure that these units are strictly used for 12 month temporary accommodations only.

**Fire Safety Design/Construction:**

49. Concerns have been raised by both Parish Council as well as local residents on fire safety requirements of these units. It has been stated in the Design and Access Statement (page 8) that the proposal utilises a passive fire protection approach to protect the internal elements of the building in accordance with current building regulations. The proposed structures would be protected using non-combustible sheathing material, intumescent sealants, and tapes to give a 60-minute fire resistance from inside to out.
50. An automatic fire suppression system will be fitted in each of the new homes to enhance the safety of the occupants from fire. Whilst this is considered acceptable, it is a matter dealt with under the Building Regulations. Informative 2 is included to remind the applicant of this requirement.

### **Infrastructure:**

#### Community Infrastructure Levy:

51. The proposal is for additional habitable floorspace and would be a CIL liable development.

### **Employment Skills:**

52. The proposal would utilise pre-fabricated units that would be manufactured off-site and will be brought into the site for assembly. These types of proposal are considered to not contribute to additional employment or skills needs and an Employment Skills Plan is not sought in this instance.

### **The Public Sector Equality Duty (Equality Act 2010)**

53. In determining this application the Council is required to have due regard to its obligations under the Equality Act 2010. The key equalities protected characteristics include age, disability, gender, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief.
54. The proposal would provide emergency shelter for individuals and families with young children who are homeless or at a risk of being homeless. One of the proposed units would be for disabled users and two parking spaces are provided for blue badge holders. Save for the potential positive impact on those with disability as a protected characteristic there is no indication or evidence (including from consultation on the application) that groups sharing other protected characteristics will be disproportionately affected in an adverse way by this planning application. In terms of the key equalities protected characteristics it is considered there would be no significant adverse impacts as a result of the development.

### **CONCLUSION**

55. The proposal would provide much needed temporary accommodation to vulnerable group within a major development location and is acceptable in principle provided the temporary length of occupation for each unit does not extend beyond 12 months. The proposal would result in change of use of a section of the existing mobile home park since the two storey prefabricated units would not fall within the legal definition of mobile homes. However, this would not have any detrimental impact on the residential

character of the area and is considered acceptable. The proposal would not have any unreasonable landscape, flooding or traffic impact, subject to recommended conditions. The application is therefore recommended for an approval.

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