

**TOWN AND COUNTRY PLANNING ACT  
1990 (AS AMENDED)**

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**PLANNING STATEMENT**

**Demolition of an existing dwelling and change of use of land for the siting of 1 no. mobile home (according to the definition of a caravan), erection of a detached garage, together with access, parking and landscaping.**

**56A FOREST WAY, WARFIELD PARK,  
WARFIELD, RG42 3RN**

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Prepared by:

**Woolf Bond Planning LLP**

For

**Warfield Homes Ltd.**

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**WBP REF: TR/JS/7699**

**March 2024**



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## 1. INTRODUCTION

- 1.1. This statement is prepared in support of a planning application for Demolition of an existing dwelling and change of use of land for the siting of 1 no. mobile home (according to the definition of a caravan), erection of a detached garage, together with access, parking and landscaping at 56A Forest Way, Warfield Park, Warfield.
- 1.2. This statement sets out the characteristics of the site and surrounding area and explains why planning permission should be granted following an analysis of the planning policy considerations and relevant planning history.
- 1.3. This application is accompanied by a number of supporting plans and documents as follows:

### Plans

Site Location Plans  
Proposed Site Plan  
Existing Plans  
Garage Details

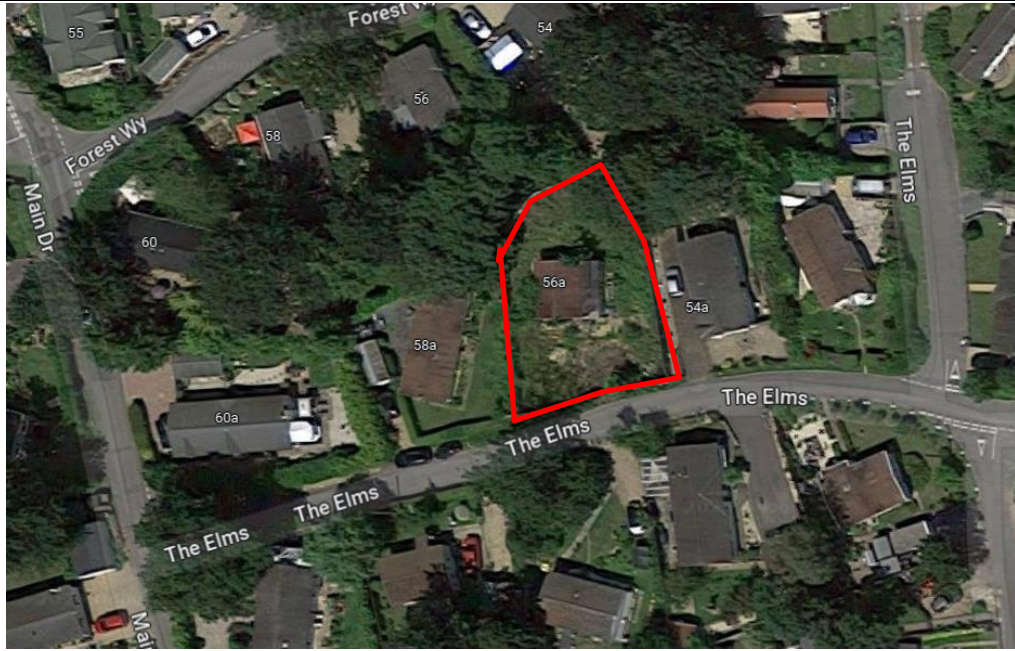
### Documents

This Planning Statement  
Ecological Appraisal & Bat Survey  
CIL Form.

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## 2. SITE AND SURROUNDINGS

- 2.1. The site is roughly rectangular in shape and forms an area of land within the defined area of Warfield Park. It is sited fairly centrally, towards the northern part of the park. The street in which the site is located is a relatively small part of Forest Way (adjoining the Wellingtonias) containing circa 10 properties facing the street. On the site is an existing single storey residential dwelling which is in a somewhat dilapidated condition and is not presently occupied. Access to the site, which is currently gated and closed, is in a central position. It is currently enclosed by a 1.8m close boarded fence to the street.
- 2.2. The existing property on the site comprises a conventional residential dwelling in C3 (dwellinghouse) use, for which there is extant planning permission for its replacement (LPA ref: 21/01180/FUL, approved 20.05.22).
- 2.3. The site is surrounded on all sides by existing park homes in their plots, with associated garaging, driveways and landscaping.
- 2.4. The site does not contain any substantial trees, however some self seeded saplings do exist on the site. There are some substantial trees to the north west of the site in the adjoining plot at 56 Forest Way.
- 2.5. Warfield Park is a long standing community of residential park homes located on the north-eastern side of Bracknell. The Park is contiguous with the eastern edge of Bracknell. The Park includes its own recreational and amenity spaces, community centre (used by the Council as a polling station), hairdresser, commercial / industrial yard, beautician, office / headquarters and launderette. The Park operator provides an on-site management service and maintains the site. It provides a form of accommodation in the Borough that is suitable for all, but in particular creates independent living opportunities for older persons.
- 2.6. The aerial photograph below illustrates the application site edged in red.



**Photograph 1: Aerial image (Google Maps, October 2023)**

2.7. The dwelling is currently vacant as can be seen in the image below.



**Photograph 2: View of the site from the street (Google Maps, October 2023)**

2.8. The application site is also located within a sustainable travelling distance to a number of services and facilities in the wider area, including Whitegrove Neighbourhood Centre that contains a supermarket (Tesco), library and health centre (1.5km), Whitegrove Primary School (1km) and St. Peter's Church (1km). There are pedestrian and cycle routes from the Warfield Park entrance

to both the Whitegrove Neighbourhood Centre and the Primary School meaning that the site is readily accessible.

- 2.9. The application site is situated approximately 3km from Bracknell town centre with its range of shops, leisure and other facilities. The town centre and Whitegrove Neighbourhood Centre can be accessed using the numbers 157 and 158 buses which run twice hourly from Westmoreland Drive located at the entrance to Warfield Park.

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### 3. PLANNING HISTORY

3.1. There are two relevant planning records for the site. They are:

- Proposed erection of a replacement dwelling with detached garage and associated hardstanding following demolition of an existing dwelling (LPA Ref: 21/01180/FUL). This was approved on 20<sup>th</sup> May 2022. Condition 1 sets out its validity for 3 years.
- Application for a Certificate of Lawfulness ('CoL') for the retention of a building (formerly a caravan) for use as a dwellinghouse (LPA Ref: 13/00908/LDC). This was approved on 6<sup>th</sup> February 2014.

3.2. The application for a Certificate of Lawfulness ('CoL') for the retention of a building (formerly a caravan) for use as a dwellinghouse (LPA Ref: 13/00908/LDC) was approved on 6<sup>th</sup> February 2014, with the officer's report concluding as follows:

#### 5. RECOMMENDATION

5.1 On the basis of the evidence provided, it has been demonstrated on the balance of probability that the structure at 56A Forest Way no longer falls within the statutory definition of a caravan as given in the Caravan Sites Act 1960 and 1968 and Caravans Sites Act 1968 and Social Landlords (Permissible Additional Purposes) (England) Order 2006 (Definition of Caravan) (Amendment) (England) Order 2006 due to its width of 7.7m to 8.4m and inability to be transported in whole. Given the structure no longer conforms to being a caravan, it is instead considered to constitute a building as defined by Section 336 of the Town and Country Planning Act 1990 (as amended) used as a residential dwelling house due to its size, permanence and degree of physical attachment. The structure has existed in this form since 1999, clearly for a period in excess of 4 years. The development is not in breach of any enforcement notice and as such is now lawful pursuant to Section 191 of the Town and Country Planning Act 1990.

5.2 Officers from the Legal Department agree with the recommendation.

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#### **Extract from officer's report relating to LPA Ref: 13/00908/LDC**

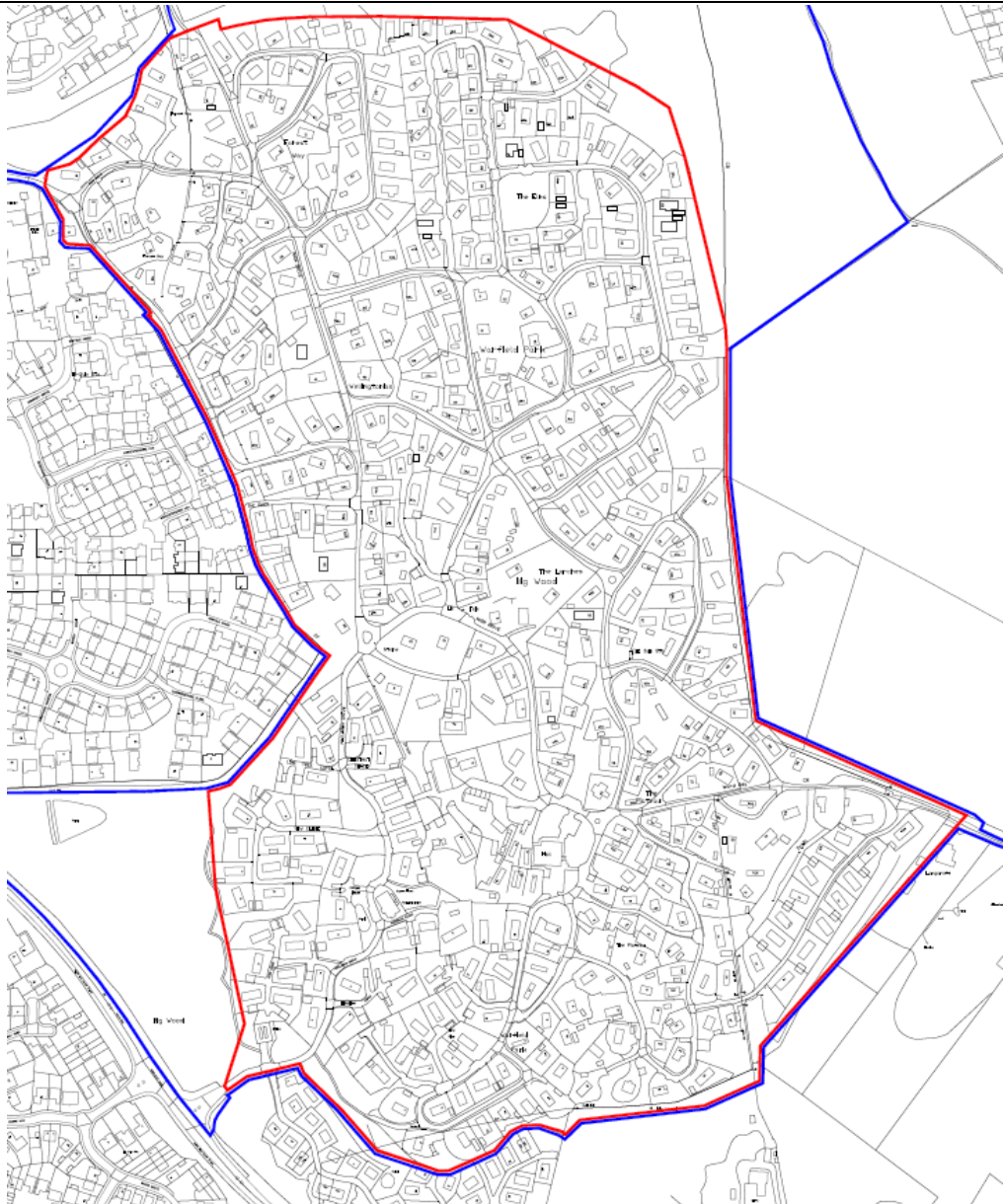
3.3. The existing property on the site is therefore somewhat unusual in forming one of only a limited number of existing conventional residential dwellings on the park falling within use class C3 (dwellinghouse).

3.4. In terms of the wider site, Warfield Park itself is a long-standing community of residential park homes, first established in 1947. Park homes provide a prefabricated form of single storey accommodation that is suitable for all, but in particular older persons (80% of occupiers on the park are over 60). The park

includes its own recreational and amenity spaces, community centre, hairdresser, beautician and launderette. The park operator (the applicant) provides an on-site warden service and maintains the site.

- 3.5. Various permissions exist on the main part of the Warfield Park site and allow for the use of the site for a total of 491 mobile homes (LPA Refs 99/00694/FUL, 99/00811/FUL, 03/00792/FUL, 03/00993/FUL, 03/01160/FUL and 19/00660/CLPUD).
  
- 3.6. The application site's lawful position as a dwellinghouse was further confirmed in the Council's recent CoL that confirmed the lawful siting of 491 caravans / mobile homes on the main part of the park and 7 dwellinghouses (LPA Ref: 20/00335/CLPUD). The area that the respective permission for 491 caravans / mobile homes and 7 dwellinghouses cover is illustrated on the red line plan over the page that supported the 2020 CoL submission:





**Figure 1: Red line showing area of site that is the subject of permission for 491 park homes & 7 dwellinghouses**

- 3.7. Some further permissions exist for additional mobile homes to the southwest of the main site at Harvest Lea. Further in September 2017, an appeal was allowed for the change of use of land adjoining Warfield Park, now known as The Paddocks, for the siting of up to 82 no. mobile homes, SANG, informal open space, together with access improvements, landscape and diversity measures (LPA Ref: 15/00383/FUL & PINS Ref. 3163349). The below plan shows the 82 no. park home scheme and areas of the wider site proposed for SANG land as approved at the 2017 appeal.



**Figure 2: Approved Illustrative Masterplan for 82 park homes**

- 3.8. The above Masterplan which was approved at appeal demonstrates the future quantum of development which will be built out as an extension to the park.
- 3.9. Permission was granted in May 2022 for the replacement of the existing dwelling on the site. This permission has not been implemented but remains extant until May 2025. Relevant extracts from the approved scheme are provided below.



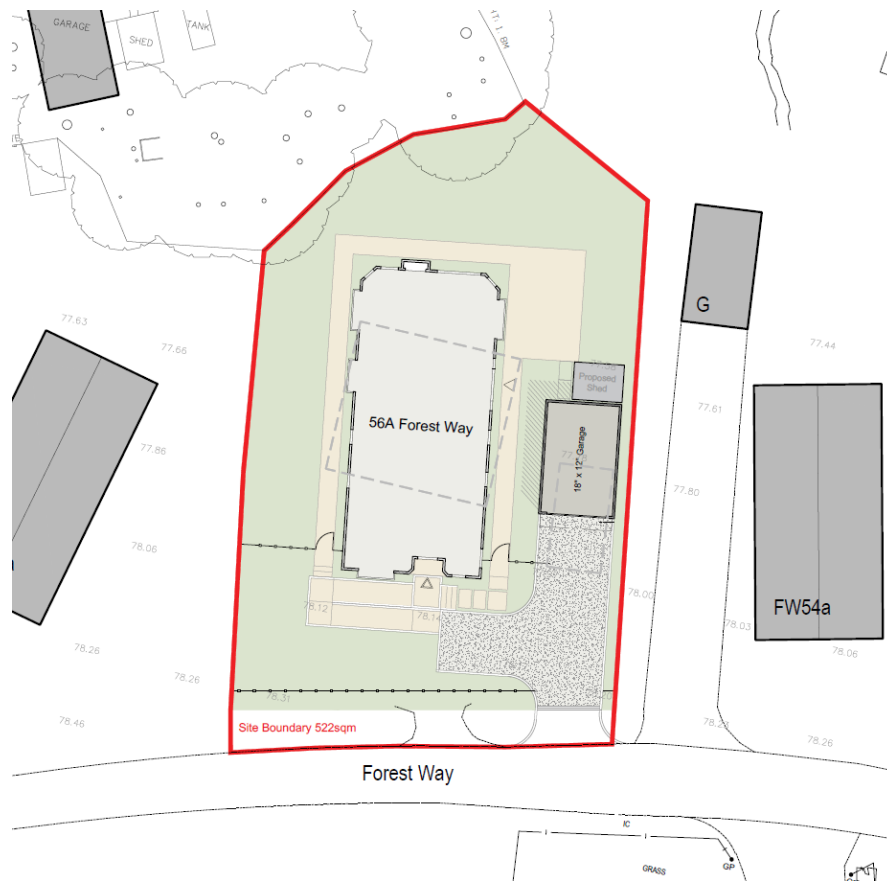
**Figure 3: Approved Replacement Dwelling Drawings**

3.10. The subject scheme is now brought forward in place of the extant permission on the basis that a park home replacement will offer a scheme equally (if not more) in keeping with the character of the rest of the park (that is largely park homes) and will offer accommodation suitable for the park's typical residents (normally of 50 years or more in age).



#### 4. THE PROPOSAL

- 4.1. The application proposes the demolition of the existing (dilapidated) dwelling, and siting of an additional mobile home within the main body of Warfield Park. The proposed site layout plan is reproduced below.



**Figure 4: Proposed Site Layout Plan**

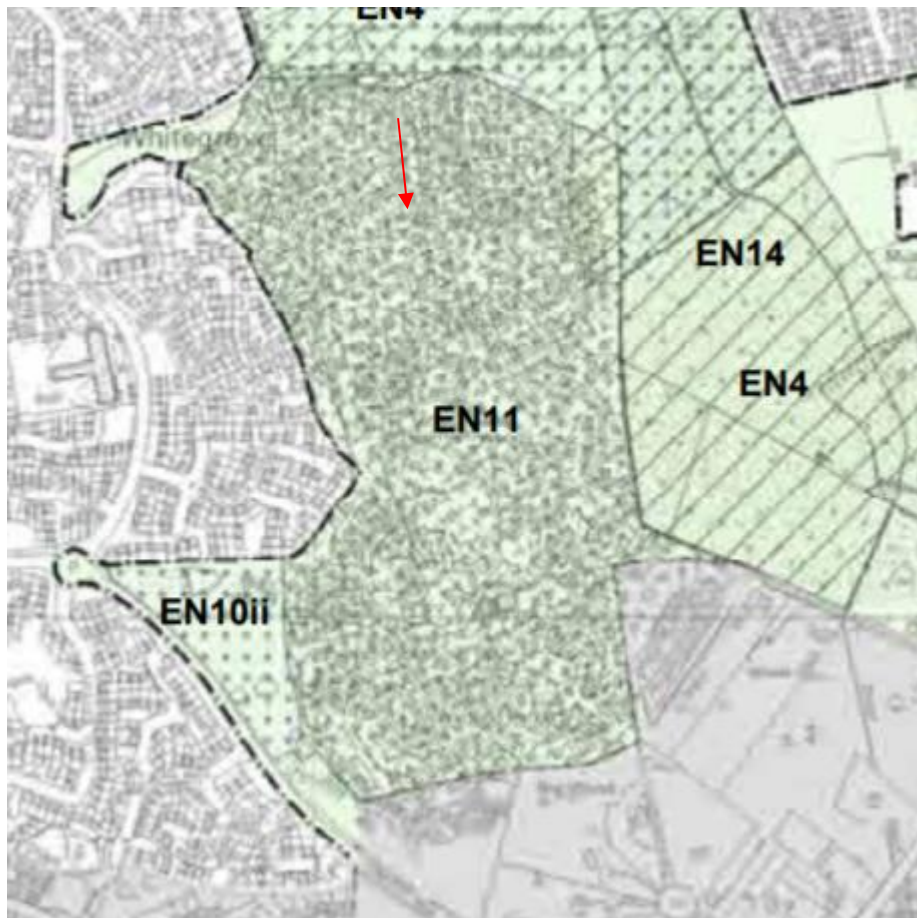
- 4.2. The above layout shows how the mobile home will be centrally situated within the site, in a location similar to that of the existing and approved replacement dwelling. A detached garage would be located on the eastern boundary, in keeping with the siting of garages within plots throughout the park. The siting of the mobile home will leave ample space for a garden area, driveway and landscaping. Access onto the plot is proposed to be moved along the site frontage, to better align with the proposed driveway and garage location. The form and layout of development would follow the established plot patterns within the vicinity of the site, and the mobile home would positively address the street frontage.

- 4.3. New planting would enhance the setting of the home and would be of benefit to the neighbours within the immediate vicinity of the site, by providing an improved landscaped area within the park. Further, a shed is proposed to the rear of the garage for the purpose of cycle storage.

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## 5. PLANNING POLICY

- 5.1. The relevant development plan comprises the Core Strategy ('CS'), the Site Allocations Local Plan ('SALP') and the saved policies in the Bracknell Forest Local Plan ('LP') and Policy NRM6 of the South East Plan (2006).
- 5.2. An extract from the Proposals Map is reproduced below, with the site's location indicated using a red arrow.



**Figure 5: Extract from the Local Plan Proposals Map**

- 5.3. The principal policies of relevance to the application are those listed below;

**Core Strategy**

|             |                                           |
|-------------|-------------------------------------------|
| <b>CS1</b>  | <b>Sustainable development principles</b> |
| <b>CS7</b>  | <b>Design</b>                             |
| <b>CS14</b> | <b>Thames Basins Heaths SPA</b>           |
| <b>CS16</b> | <b>Housing needs of the community</b>     |

**Site Allocations  
Local Plan**

**CP1 Presumption in favour of sustainable development**

**Bracknell Forest (saved policies)  
Local Plan**

**EN1 Protecting tree and hedgerow cover**

**EN3 Nature conservation**

**EN4 Local Nature Reserves, Wildlife Heritage Sites and Regionally Important Geological Sites**

**EN11 Warfield Park Mobile Home Site**

**EN20 Design considerations in new development**

**South East Plan  
(saved policy)**

**NRM6 Thames Basin Heaths Special Protection Area**

- 5.4. The key saved Local Plan policy which applies to the site is EN11: Warfield Park Mobile Home Site, which states:

**‘2.85 DEVELOPMENT WILL BE PERMITTED ONLY WHERE IT DOES NOT DETRACT FROM THE CHARACTER OR APPEARANCE OF THE MOBILE HOME SITE.**

**2.86 Warfield Park Mobile Home Site covers 30 hectares and is located in the countryside area south of Forest Road, east of Whitegrove. The site is bounded to the north and south by woodland of considerable amenity value, and the mobile homes themselves are laid out in an attractive wooded setting. The Borough Council will seek to maintain the character of the site and ensure that the existing homes retain their secluded setting.**

**2.87 The Borough Council will ensure that any proposals to extend Warfield Park Mobile Home site beyond its existing EN11 policy boundary will be determined on the basis of the intrinsic character of the entire site as well as policies EN8 and EN10, if applicable, as shown on the Proposals Map’.**

- 5.5. A further relevant saved Local Plan Policy is H6: Development involving existing dwellings in the countryside outside the Green Belt, which states:

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**‘5.44 DEVELOPMENT INVOLVING EXISTING DWELLINGS IN THE COUNTRYSIDE OUTSIDE THE GREEN BELT WILL BE PERMITTED PROVIDED THAT IT WOULD NOT ADVERSELY AFFECT THE CHARACTER OF THE AREA, WOULD NOT RESULT IN INCONVENIENCE OR DANGER ON THE PUBLIC HIGHWAY OR CAUSE ANY OTHER ENVIRONMENTAL OR OTHER HARM, AND CONSTITUTE: (i) THE REPLACEMENT OF EXISTING DWELLINGS ON A “ONE FOR ONE” BASIS;’**

- 5.6. Further, saved Policy H11 seeks to retain existing residential stock. Whilst the proposal forms a change of use of land (and therefore requires planning permission), the scheme will retain a single residential dwelling appropriate for use by a small to medium sized household consistent with the existing dwelling on the site and the extant replacement dwelling permission. Consequently, no breach of this policy occurs.
- 5.7. Additionally, there are various supplementary planning documents which are relevant to the consideration of this application on parking standards, design, character areas and planning obligations.

#### **Emerging Local Plan**

- 5.8. On 19 January 2023, the appointed Inspectors issued a post hearings letter which identified a range of main modifications (consulted upon in late 2023).. At this time, it is not known when the emerging Local Plan can be adopted.
- 5.9. Thus, until the emerging plan is adopted, the relevant development is the Core Strategy (‘CS’), the Site Allocations Local Plan (‘SALP’) and the saved policies in the Bracknell Forest Local Plan (‘LP’) and Policy NRM6 of the South East Plan (2006).

#### **National Planning Policy: The National Planning Policy Framework (NPPF, 2023)**

- 5.10. The Framework in its entirety is relevant to the consideration of this application. In this context, policies in the CS and LP are out-of-date, through reference to paragraph 225 of the Framework and therefore it is necessary to consider, when they are applied, how consistent they are with the Framework.



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- 5.11. In accordance with national policy, the proposal respects the prevailing character thereby creating a high quality development through the provision of additional homes in an established residential area.

Delivering a sufficient supply of homes

- 5.12. Paragraph 60 requires LPA's to boost significantly the supply of housing and that it is important that a sufficient and variety of land can come forward where it is needed.
- 5.13. Paragraph 63 supports the provision of housing needed for different groups in the community, including *inter alia* older people, those who rent their homes and people with disabilities, and requires this to be reflected in planning policies. The provision of an additional park home contributes towards meeting these housing needs, alongside market provision.

Achieving well-designed places

- 5.14. Paragraph 131 of the NPPF makes it clear that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning process should achieve; and that good design is a key aspect of sustainable development.
- 5.15. Paragraph 135 states, *inter alia*, that:

**“Planning policies and decisions should ensure that developments:**

- a) Will function well and add to the overall quality of the area, not just for the short term but the over the lifetime of the development;**
- b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping...”**

- 5.16. This development proposal would ensure that the character and appearance of the application site is in keeping with the established wider park home site. Landscaping and planting included as part of the development proposals will ensure a high quality, visually attractive development which is in keeping with the existing character of the area.

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## 6. THE NEED FOR OLDER PERSON ACCOMMODATION IN THE BOROUGH

6.1. Paragraph 63 of the NPPF requires local authorities to **'plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community such as, but not limited to, families with children, older people, people with disabilities.'** Therefore, meeting the housing needs of older people is a requirement placed upon Local Authorities.

6.2. The Core Strategy (Policy CS16) states that **'development will be permitted that contributes to meeting the needs of all sectors of the community'**. The supporting text to this policy (paragraph 184) states that **'household needs include those of the elderly, and that the type of homes to address these and other needs will include park homes'**.

6.3. The Planning Practice Guidance (Paragraph 12 Reference ID: 012 63-012-20190626) confirms (with respect of identifying needs for older people):

**"Many older people may not want or need specialist accommodation or care and may wish to stay or move to general housing that is already suitable, such as bungalows, or homes which can be adapted to meet a change in their needs. Plan-makers will therefore need to identify the role that general housing may play as part of their assessment.**

**Plan-makers will need to consider the size, location and quality of dwellings needed in the future for older people in order to allow them to live independently and safely in their own home for as long as possible, or to move to more suitable accommodation if they so wish."**

6.4. As a single storey property, park homes, similarly to bungalows cater specifically for the needs of older people. Indeed, surveys of existing Warfield Park residents have shown that 89% of residents are over 50 years of age (80% are over 60).

6.5. Table 110 of the Berkshire Strategic Housing Market Assessment ('SHMA') (2016) indicates that a 73% increase in the number of people aged 65 and over is expected between 2013 and 2036 across the study area. By comparison,

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there is expected to be an increase of 89.8% in this age group within Bracknell Forest over this period.

- 6.6. Furthermore, the NPPG goes on (Paragraph: 016 Reference ID: 63-016-20190626) to specify how local planning authorities should address applications for specialist accommodation:

**“Decision makers should consider the location and viability of a development when assessing planning applications for specialist housing for older people. Local planning authorities can encourage the development of more affordable models and make use of products like shared ownership. Where there is an identified unmet need for specialist housing, local authorities should take a positive approach to schemes that propose to address this need.”** [our underlining]

- 6.7. Table 114 of the SHMA indicates that there is likely to be an increase of 109% in the number of people with mobility problems in Bracknell Forest over this period. The provision of single storey properties; such as park homes as proposed in this application; will provide accommodation that is well adapted to meet these needs.
- 6.8. A need for C3 (specialised) accommodation of 1,320 dwellings is identified in the SHMA. There is therefore a pressing quantified need for types of accommodation that serve the needs of older people but still provide independent living, such as park homes.
- 6.9. There is a qualitative issue whereby there is limited available accommodation in the Borough that enables older persons to live independently for longer. In accordance with references made in the SHMA and 2017 Housing White Paper: “Fixing our broken housing market”, the provision of the proposed accommodation (particularly as part of a community with its own services and facilities) provides such older person accommodation whilst enabling independent living and relieving pressure on care home accommodation and NHS services. In addition, the availability of such accommodation further encourages the principle of downsizing having resulting benefits upon the wider housing market by freeing up larger properties for use by larger households (e.g. younger families).

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6.10. The above highlights that the proposed scheme has significant economic and social benefits in terms of meeting a specific quantified need for older person accommodation. Further it provides an appropriate form of older persons accommodation that enables one to continue to live independently, resulting in well-being and yet further social benefits. This is consistent with the White Paper that supports the principle of providing a better choice of accommodation for older persons.

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## 7. ASSESSMENT IN RELATION TO PLANNING POLICY

### **Principle of Development**

- 7.1. The application site is located within the existing boundary of Warfield Park and as such development is guided by saved Local Plan Policy EN11. Policy EN11 is permissive of development within the site, provided that it *'does not detract from the character or appearance of the mobile home site'*.
- 7.2. The proposed development, replacing an existing dilapidated dwelling with a new mobile home, is considered to be a wholly appropriate use of the site, given its setting inside the Warfield Park and EN11 boundary.
- 7.3. The character and appearance of the mobile home site is that of single storey park homes in a maintained landscaped setting, with a variety of trees, shrubs and boundary treatments, as well as variously surfaced driveways and occasional garages.
- 7.4. The proposed replacement of a dilapidated dwelling with a modern park home within the established park is entirely in keeping with the character of the area.
- 7.5. Further, saved Policy H11 seeks to retain existing residential stock. Whilst the proposal forms a change of use of land (and therefore requires planning permission), the scheme will retain a single residential dwelling appropriate for use by a small to medium sized household consistent with the existing dwelling on the site and the extant replacement dwelling permission. Consequently, no breach of this policy occurs.
- 7.6. On this basis, it is considered that the principle of a park homes on this site is acceptable and consistent with the character of the area.

### **Design & Landscaping**

- 7.7. The design of the park home and the associated moveable, modular garage would be similar to designs used in the vicinity of the development and the Park as a whole. It would also refresh a vacant plot in significant need of investment.

- 7.8. To the north of the park homes an area of public open space exists. This includes existing trees together with the amenity and wildlife diversity which enhances the setting of the park, and the specific application site. The scheme offers the opportunity for landscape betterment given its current overgrown condition which has existed for several years. The provision of a new home with a quality landscaping scheme will enhance the landscaping offer.

**Impact on amenity of neighbouring plots**

- 7.9. There are existing close-board boundary fences between the application plot and the neighbouring homes which effectively screens the sites and provides privacy for the existing homes. This will remain in situ as part of the proposals.
- 7.10. The proposed orientation of the new park home will be in line with those as existing, facing onto the Forest Way site frontage to the south. It would have a conventional back-to-back relationship with the adjoining plot to the north. The separation distances, together with the commensurate single storey relationship between existing and proposed homes also minimises the potential for any overlooking or privacy issues.



**Photograph 3: View across the site towards 54A Forest Way**





**Photograph 4: View across the site towards 58A Forest Way**

- 7.11. The development proposal can enable a landscaping plan for visual enhancement of the plot. This will introduce new planting. The proposed landscaping plan will benefit both the existing and new residents in terms of offering an attractive planted area.
- 7.12. The additional planting will also contribute positively towards maintaining and enhancing the established landscaped character of the park and act as a focal point when one walks through the park.
- 7.13. In this respect, it is considered that the proposal fully meets the requirements set out in Policy EN11.

#### **Highway Matters**

- 7.14. The proposal is effectively for a replacement home, and as such there will be no material change in the amount of traffic movements expected at the site. Further, the proposal includes sufficient parking to comply with the Council's standards. Given the limited scale of the proposal with its minimal traffic movements, the scheme will not have significant adverse effects on highway

safety. The scheme therefore complies with Core Strategy Policy CS24 and NPPF paragraph 115.

### **Ecology**

- 7.15. The site is located within the 5km zone of the Thames Basin Heaths Special Protection Area. This application is for the replacement of a residential property. It will not increase the number of dwellings and consequently the number of residents will not increase to be considered to have an impact on the SPA. Ecological surveys have been undertaken by a specialist consultancy and confirm that there are no ecological constraints to development of the site. Measures to mitigate for any impacts have been set out in the Ecological Appraisal and updated Bat Survey. Implementing the recommendations will ensure that there are no significant impacts upon protected species and that the proposals will be in conformity with relevant legislation and policy.

### **Development Plan Summary**

- 7.16. The scheme provides for the replacement of an existing residential dwelling on a “one for one” basis with a park home. It enables an improved design when compared to the site's current somewhat dilapidated appearance, the restoration of improved landscaping adjacent to Forest Way and a form of development wholly consistent with the rest of Warfield Park. The scheme is therefore consistent with the character of the area. No danger to the public highway will be created and the scheme complies with the Council's parking standards. Further, as confirmed in the ecological reports no environmental harm would occur. The scheme therefore complies with saved Local Plan Policy H6 and the development plan as a whole.



## 8. CONCLUSION

- 8.1. The application site is located at Warfield Park, a **sustainable location** in providing for development.
- 8.2. The application site is **within a reasonable walking distance from a range of local services and facilities**, and represents a **sustainable location** in providing for additional mobile homes to meet identified needs.
- 8.3. The application scheme represents a **high quality development** that accords with spatial and development control type policy requirements of the Development Plan.
- 8.4. The proposed development is considered to **achieve adopted policy objectives** to include: good quality design, safe means of access, sustainable form and location of development, acceptable impact on the character and appearance of the local area and nature conservation interests. In particular, the application is in accordance with saved Local Plan Policy EN11 which allows development within Warfield Park which respects the character and appearance of the site. This statement has explained how the proposed development achieves these requirements, and as such the application proposal provides for an entirely acceptable form of development.
- 8.5. Furthermore, in providing a new park home (replacing an existing dwelling), the application will assist in contributing towards a niche housing market which focusses on providing suitable homes for the older generation. This in turn helps in freeing up family housing in the local area through downsizing, and keeps the housing market responsive.
- 8.6. The technical appraisal of the site and surrounding area demonstrates that the application scheme will provide for a high quality residential environment in a sustainable location, within walking distance from local services and facilities.
- 8.7. For the reasons stated the scheme is development plan compliant and can be supported. Further and having regard to **the presumption in favour of sustainable development set out in the NPPF**, planning permission can also

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be granted given that the scheme meets the economic, social and environmental roles of the NPPF.

- 8.8. The application should be supported and planning permission granted.

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