

# SHOREWOOD

## HOMES

Planning Inspectorate  
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31 July 2026

Dear Sir/Madam

### **Appellant's Final Comments**

#### **Appeal by Shorewood Homes**

**Address: Land north of Broadwater Lane and west of Hogmoor Lane, Hurst, Berkshire, RG10 0DY**

**Appeal Reference: 6011047**

I write with reference to the above planning appeal and provide the **Appellant's Final Comments**.

These are made in response to the Council's statement and their heritage officer's statement, as well as Ridgeway's heritage statement (for Dr & Mrs Lade) only.

### **Wokingham Borough Council Appeal Statement**

1. **WBC Para 5.8 and para 5.15** references policies CP9 and CP11 – Note appeal decision letter (DL) para 60 for the previous appeal (APP/X0360/W/25/3359898 – attached at **Appendix 1 of my Appeal Statement**) which listed the policies the proposals conflicted with (CC03, TB24, TB26). There was no reference to CP9 and CP11 by the Inspector because para 46 noted limited weight for the conflict with CP9 and CP11 (as well as CC02).
2. **WBC Para 5.17** says *"the Council are of the view that it is the maximum scenario that needs to be assessed"*. This position is not justified and conflicts with the PPG (see PPG paragraph 016, Reference ID: 58-016-20180615) which states *"The amount of development must be expressed as a range, indicating the minimum and maximum net number of dwellings..."*. The correct basis is to assess the range of development. It is clear the Council has not done this.
3. **WBC Para 5.23** refers to Haines Hill Valued Landscape. The Inspector to the previous appeal (APP/X0360/W/25/3359898) said at para 41 he was *"not confident that the appeal site should be considered as part of a valued landscape based on current evidence."* The site is not in a Valued Landscape. There is no current designation, and the proposals are subject to unresolved objections in the draft local plan examination.
4. **WBC Para 5.27** refers to *"the higher density and internal road arrangement, gives the scheme an 'estate' appearance ... as referenced in the Borough Design Guide (2012)"* (NB. The Borough Design Guide was supplied by WBC with their Appeal Questionnaire).

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- i. The reference to an 'estate' is mentioned once in the SPD under Section 4.1 where it relates *"to larger areas of new housing (often called estates)."*
  - ii. There is no sensible basis for the Council to suggest that a minor residential development of only 5 to 7 homes is remotely equivalent to an 'estate' (or *"urbanisation"* as suggested at **para 5.26**), and therefore, cannot connote to having an 'estate appearance'.
5. **WBC Para 5.27** also states the *"layout is in an excessively urban form, and obstructs important views across the landscape"*. The Borough Design Guide at Section 3B Local Character and Figure 3B.12 shows the figured ground for Hurst and notes it *"indicates that development is predominantly detached and more scattered than in other character areas"*.
- i. In any reasonable approach the indicative proposals are reflective of local character.
  - ii. There are no identified important views in the development plan or other material considerations.
  - iii. This is a subjective statement with no evidenced policy or other corresponding position.
  - iv. Accepting the Council's position would necessitate similar rejection of development sites on any similar field adjacent a settlement and this is reflective of the Council's exaggerated position.
6. **WBC Para 5.28** states the proposals result in *"new harm to the AoSC"* and supplemented at **para 5.29** where it states, *"particularly the development on Hogmoor Lane"*. This is also an exaggerated statement. The issue was considered by the Inspector in the previous appeal and the position on harm was solely in relation to two trees T14 and T16. There are no such features affected by this appeal proposal. It is not reasonable to now suggest there are new harms when the proposals on Hogmoor Lane indicate detached homes, reflecting a linear pattern, varying building lines and set backs, and planting. That aligns with the 'common characteristics' for loose villages, such as Hurst (see Borough Design Guide SPD, section 3B.2.3 Loose village).

#### **Appendix 1 – Statement from WBC Built Heritage Specialist**

- 7. **Para 1.3** incorrectly refers to 'Sherwood Homes' and the previous appeal being for 7 dwellings but that should read as 9 dwellings.
- 8. **Para 4.2.1** refers to *"the open field setting"* providing contemporary contextual understanding of the former farmstead, allowing for *"greater appreciated (sic) of the historic significance..."*. However, there is no quantification of the significance of the setting by the Council.
- 9. **Para 4.2.2** as above – the statement references the historic landscape opposite *"provides a contribution to its significance"* but fails to provide any quantification of its significance. Same at **para 4.2.3 and 4.2.4**.

10. **Para 4.2.4** makes an unevidenced statement that the front garden wall and adjacent Parkers Cottage *“provides an important component of the character and appearance of the AoSC”*. However, this is not referenced in the AoSC (see Appellant’s Appeal Statement Appendix 9 - Historic Environment Topic Paper, pages 94-99).
11. **Para’s 5.4 to 5.7** provides statements about “the manor of Whistley” dating back to AD 968 and interspersing reference to listed buildings with vague and imprecise references and statements, such as “suggestion”, “uncertain qualities”, “as far as can be reasonable assumed”, etc. As per the points in the previous paragraphs, there should be no reliance whatsoever on these statements as evidence.
12. Similarly, **Para 5.18** speculates that Bower Cottage was *“likely constructed in relation to the surrounding agricultural function”*, and **para 5.19** for Parkers Cottage muses on *“the continuing prosperity of the land...”*. The Council’s approach is seemingly to make lots of suggestions and speculation. This is not the same as fact, and this does not assist the Inspector.
13. **Para 5.9** refers to the area of special character being designated not only for the built form in the vicinity, but also the landscape and setting. This is incorrect. If those fields, such as the appeal site were of special character they would have been included in the designation. They have not.
  - i. The AoSC is tightly defined predominantly to the built form save for the boundary along the north side of Broadwater Lane and wrapping around Wards Cross House and Long Barn and then eastwards (and an area of recreational space elsewhere in the village).
  - ii. Similarly, the reference at **para 5.11** that any built form development on the appeal site *“would have a detrimental visual and spatial impact on the wider AoSC...”* is not correct. The Inspector in the previous appeal did not say that and this is an unreasonable position from the Council trying to raise new matters.
14. **Para 5.17** – the impact on the setting of Wards Cross House was not a matter in the previous appeal. It is unreasonable to suggest that it now is and our Appeal Statement and appendices with alternative layout arrangements showed how layouts could align with positionings from the previous appeal when there was no impact to Wards Cross House as identified by Inspector Burnham.
15. **Para 5.17** also refers to Long Barn as a Non-Designated Heritage Asset (and also **para 6.2**). That is not correct. There is no local list and the AoSC (see Appendix 9 Historic Environment Topic Paper on pg94) lists three NDHAs, and Long Barn is not one. Rather Long Barn features under *“undesigned heritage assets that positively contribute to the AoSC”*.
16. **Para 5.22-5.26** seeks to challenge the evidence and credibility of Mr Bob Edwards of Forum Heritage Services. This is disappointing from the Council. In response, Mr Edwards has provided

an Appeal Statement (Heritage) Addendum to rebut those comments. This statement is attached as **Appendix 1** to these Final Comments.

**Ridgeway Heritage Consultancy Appeal Statement (on behalf of Dr & Mrs J Lade)**

17. **Para 3.2** says Long Barn is locally listed. However, the Inspector is referred to the Asset Heritage Consulting Heritage Statement (January 2026), submitted with the PIP application and which the Inspector will have. That Statement noted at para 3.2.58 that the Historic Environment Topic Paper prepared by the Council, identifies Long Barn as a curtilage listed building, but then in the table on pg95 it is identified as an ‘undesigned heritage asset that positively contributes to the AoSC’. It is not included on the local list and is not formally recognised as a Non-Designated Heritage Asset. This clarification is relevant to note as the reference to locally listed appears throughout the Ridgeway statement, e.g. **para 3.5** and **para 3.9**, etc.
18. **Para 3.9** notes *“the overgrown borders (on Hogmoor Lane) have since been cleared, thus offering unrestricted views...”*. For the Inspector’s benefit, its clearance was not authorised and is similar to the unauthorised clearance by trespassers on the Broadwater Lane frontage referred to at **para 1.9** of my Appeal Statement.
19. **Para 6.4** we query the reference that the NPPF has increased provision for non-designated heritage assets. Reference is made to footnotes 7, 8 and paras 202, 203 and 207 but this is not explained. NDHAs are not in footnote 7 of the NPPF, for example. In any event, the NPPF in place at present is the same version as was considered by Inspector Burnham with the previous appeal at the end of 2025.
20. **Para 8.14** refers to settlement gaps and cites the 1999 appeal. However, Ridgeway do not mention the Inspector in the previous appeal referenced this at para’s 35 and 42 of the decision letter (i.e. *“there is no obvious gap”*).
21. **Para 8.18** accepts that the field is *“not formally designated”*.
22. **Para 8.20** cites landscape and WBCs landscape assessment. However, this is not a relevant matter in this appeal and it was addressed in the previous appeal, see DL para 42 *“there would be no significant adverse impact on the landscape”*.
23. **Para 9.2** Ridgeway question Forum’s input. I can confirm that Mr Edward’s has visited the site. The purpose for the report by Forum was to focus on the designated heritage assets only. This was because the Asset Heritage Consulting reports had already dealt with those as well as all other heritage assets, and that report could continue to be relied upon and is with the Inspector because it was a document submitted with the PIP application. It was deemed appropriate and proportionate for Forum to provide a focussed and concise report on the designated heritage

assets in order to assist the Inspector (as explained at para 1.7 of my Appeal Statement). The same applies in response to the comments made in **para 9.14 and 9.15**. Similarly, **para 9.17** references the appellant's assessment – but as above, this was already addressed in Asset Heritage Consulting's report.

24. **Para 9.8** starts to go down the same route as the Council's heritage officer, and whilst they accept there is no evidence on this particular point, they 'muddy the waters' by speculating about possible permutations and they make statements such as "plausibly identified", "*would certainly imply...*" and "*an implied close historical association...*". This is not helpful to the Inspector.
25. **Para 9.10** states that no such hedgerows exist today and no such hedgerows existed since at least the mid-C18th. However, elsewhere in the Ridgeway statement they write:
  - i. **Para 3.3** references the area surrounding Hurst village being characterised by fields with "*hedged boundaries*".
  - ii. **Para 3.13** notes the Hurst Tithe Map of 1842 "*continues to depict the Appeal Site as open agricultural land, with hedged boundaries which conform to those of the present.*"
  - iii. **Para 7.3** notes the Appeal Site and its rural surroundings have remained unchanged since at least the mid-eighteenth century, and no doubt much earlier.

I trust that these final comments (and clarifications) are of assistance. If you have any queries, please get in touch with me on 07500 070299 or [stuart@shorewoodhomes.co.uk](mailto:stuart@shorewoodhomes.co.uk).

Yours sincerely



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Head of Planning

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**Appendix 1 – Appeal Statement (Heritage) Addendum, Forum Heritage Services**

**LAND NORTH-EAST OF BROADWATER LANE,  
HURST, BERKSHIRE**

**Appeal Statement (Heritage) Addendum**

This brief addendum to the appeal statement relating to heritage is written in response to the appeal statement prepared by the Council's Conservation Officer, specifically in relation to the examples of other projects where I have discussed the setting of farm buildings which, it is openly acknowledged, were included in the appeal statement with the intention of undermining my evidence and credibility.

Firstly, I am a full member of the Institute of Historic Building Conservation and so I am, therefore, bound by the Code of Conduct which requires me to act in a professional manner in all my dealings with the historic environment.

It is notable that the Conservation Officer undermines his efforts to discredit my evidence by noting (para 5.25) that it is accepted that the sites referred to are in different area and of different interest. The usual defence Councils put forward when presented with examples that are suggested as representing a precedent or an acceptable approach to change is 'Every site must be judged on its own merits', but here the Council is trying to argue that there is precedent in the way that I have responded to or discussed individual historic farmsteads in the past.

With regard to the Sherborne St John application, there are some very key differences between the two applications. Most notably, Manor Farmhouse in Sherborne St John has a direct visual relationship to the area of landscape proposed to be developed. This is in contrast to this case with regard to Wards Cross Farmhouse where the listed farmhouse is completely divorced visually from its former farmland.

The impact of the development at Sherborne St John was also greater because there was a specific importance in terms of the plan form of the village in terms of the fact that the Church and Manor Farm were located together, set slightly away from the main core of the settlement: this Church : Manor relationship was of high importance in terms of setting, and therefore the retention of open countryside around Manor Farmhouse, and not allowing the settlement to wrap around the farmstead was important to preserve the significance of the listed building. The sensitivity to change within the setting of Wards Cross Farmhouse is completely different to that of Manor

Farmhouse in Sherborne St John. Additionally, Manor Farmhouse lies within a conservation area and so again, the heritage issues were greatly different to the case that we are dealing with here.

It is regrettable that the Conservation Officer would present the Sherborne St John application as evidence of my inconsistency where the issues were markedly different with apparently no critical analysis of the particulars of the case.

In relation to the conservation area appraisal for Little Bookham, this was a document prepared by my colleague, James Webb, apart from the illustrative mapping which I produced, and so I am afraid I cannot speak specifically to the importance of the setting of Manor Farmhouse.

The Conservation Officer refers to my work with English Heritage in relation to a farmstead character. The work undertaken with English Heritage related to recording farmsteads at a landscape scale to identify and understand broad patterns of farmstead character across whole landscapes. The work raised the importance of historic farmstead groups which did not include a listed building and so emphasised that these historic but undesignated farmstead groups make contributions to landscape character through their plan form, building types and materials. Nowhere in this document does it say that the settings of all farmsteads have the same level of importance. This appears to be an intentional misunderstanding or mis-representation of the focus of that particular piece of work to undermine the conclusions I have drawn regarding the importance of the setting of Wards Cross Farmhouse which follows the approach as set out in the Historic England guidance on assessing the importance of heritage assets.

The Conservation Officer has raised no new issues that would cause me to change my opinion with regard to harm to any of the listed buildings in terms of the impact on how these heritage assets would be experienced, or their importance understood and appreciated – the definition of the importance of setting as set out in the NPPF.

Bob Edwards