

**Rosebank
Tape Lane, Hurst
RG100DP**

2nd March 2026

Email to: Development.control@wokingham.gov.uk

Planning Officer, Wokingham Borough Council

Re: **Application 260353 – Land North of Broadwater Lane and West of Hogmoor Lane, Hurst
Permission in principle application for the proposed erection of 7 dwellings (or minimum of 5 dwellings) including formation of an access from Broadwater Lane.**

I wish to **OBJECT** to this application for the following reasons:

1) Conflict with Permission in Principle (PiP) application criteria

The Criteria application for a PIP application are:

- Number of dwellings must be between 1 and 9
- Total Development Area UNDER 1000 square metres
- Site Area LESS than 1 hectare
- Site Suitability: The site must be suitable in principle based on location, land use and amount of development.

This application is a classic demonstration of the applicant/landowner breaking down larger projects into small components to avoid comprehensive regulatory scrutiny. This is a controversial tactic and regulatory bodies and courts are increasingly vigilant against this practice to ensure **that the full scope of a development's impact is considered by the Local Planning Authority in a planning decision.**

a) The site taken as a whole FAILS the LESS THAN 1 hectare criteria:

- i) **There is a functional interdependence:** The main site will not be able to function responsibly and properly without the inclusion of the 'large' attenuation pond and that therefore indicates that the 2 separate areas constitute a single project. Despite the necessity of requiring the attenuation pond to fulfil the mandatory Sustainable Drainage Strategy (SuDS) in an area which is prone to flooding, the area for the attenuation pond has been deliberately excluded from the red line defined development site area. **Paragraph 3.1.2 of the Applicant's Supplementary Statement on Flood Risk states and confirms that the large attenuation basin is a necessary part of the development and therefore it cannot be denied that there is a functional interdependence:**

*3.1.2 Evidence of standing water on the site has also been raised, which was also acknowledged in the flood risk assessment and linked to the site being relatively flat and the underlying soils having poor drainage characteristics. **The flood risk assessment identified that surface water would be managed by the proposed surface water drainage scheme, which would use shallow sustainable drainage systems (SuDS) including swales and permeable pavements.***

And also states: ***The surface water drainage scheme and finished level scheme also ensured that there would be no increase in surface water flood risk to neighbouring sites as it directed all runoff and exceedance flows to a large attenuation basin where runoff would be stored...***

It should also be noted that the proposed site and the site for the functional interdependent SuDS attenuation pond is owned by the same landowner and therefore it would be entirely possible for the attenuation pond to be included in the application.

- ii) In addition to excluding the attenuation pond, which due to its functional interdependence, should be included as part of the site area calculation at this stage, the applicant has also removed from the 'red line of development' the Root Protection Area (RPA), Buffer Zone around Veteran Oak Tree T1. This deliberate omission from the site is unacceptable because no matter what the future layout is ('illustrative' at this point and 'technical' at PIP Stage 2), ultimately, this area, owned by the same landowner as the PIP site, will be 'landlocked' on the site and therefore will automatically become an area of amenity for the sole use and benefit of the future residents, it therefore constitutes part of the PiP application site.

In order for WBC to ensure that the **full scope of a development's impact is duly considered, it must include the functional interdependent attenuation pond and the amenity of the RPA/Buffer Zone within the proposed site. Once these are included, then there is no doubt that this site exceeds the 1ha criteria for the Stage 1 PIP application.**

2) Conflict with the Stage 1 PIP criteria of UNDER 1000 sq metres of 'development'.

Currently this is an undeveloped greenfield site in the countryside. **Any introduction of infrastructure, roads, attenuation ponds and dwellings on to the greenfield site must be considered as a material change of use – ergo 'development'.** The PIP states it is applying for between 5 and 7 dwellings, but in order for the PIP to succeed, function and be viable, the development must also include an access, internal road, driveways, pathways, which will be at least 700m² and a 'large' attenuation pond (no dimensions given), all of which are classified as 'development' on greenfield sites. These proposed dwellings are likely to be large dwellings in large plots to maximise the profit and increase viability of the site. Even if only 5 dwellings were to be permitted, there is not enough room on the Broadwater Lane frontage to accommodate these alone, neither will 5 be possible on the Hogmoor Lane frontage, thus there has to be an 'L' shaped development to accommodate either 5 or 7 dwellings. Taking the average ground floor area of a 4 bedroomed house including a garage, alongside the access and proposed internal road (which must avoid all RPA's of the veteran trees) and the functional interdependent large attenuation pond **brings the development of the site to exceed 1000 m².**

3) Conflict with PIP criteria for site suitability based on location and land use:

a) This site is unsustainable and conflicts with CP11 and emerging Policy SS4.

This site is in conflict with CS Policy CP11, it does not fulfil any of the exemptions. Just as importantly, **it does not align with the emerging LPU¹ Policy SS4** (which is gaining weight as it proceeds through the examination and hearing process) which states and also clarifies the purpose of the current CP11 policy:

SS4: As an exception, proposals for limited residential development adjacent to minor settlements will only be supported where one of the following circumstances is met:

- a) The proposal involves the partial or full redevelopment of previously developed land which would not unacceptably harm the character and appearance of the surrounding countryside or the rural setting of the village;***

¹ As of 2nd February, 2026 the WBC LPU announced that Part 2 hearings for the emerging LPU will take place between March and June 2026.

b) The proposal **represents limited infilling of an otherwise built-up frontage** and where the site is compatible with the core shape, form and size of the settlement; or

c) The proposal constitutes exceptions housing in accordance with Policy H4.

d). **Residential development proposals outside the Green Belt and on unallocated sites adjacent to minor settlements will be refused.** This includes when a five year housing land supply cannot be demonstrated, or the Housing Delivery Test indicates that the delivery of housing was below 75% of the housing requirement over the previous three years.

b) **This site has been found previously and consistently by WBC to be unsuitable for development for 70 years.**

- i) This site was submitted as a potential site for the emerging WBC LPU (Site 5HU030). It wasn't just for the frontage of Broadwater or the frontage of Hogmoor Lane, but a much larger area (See Image 1) which includes the PIP application site in toto and also where the development for the 'large' attenuation pond is proposed.

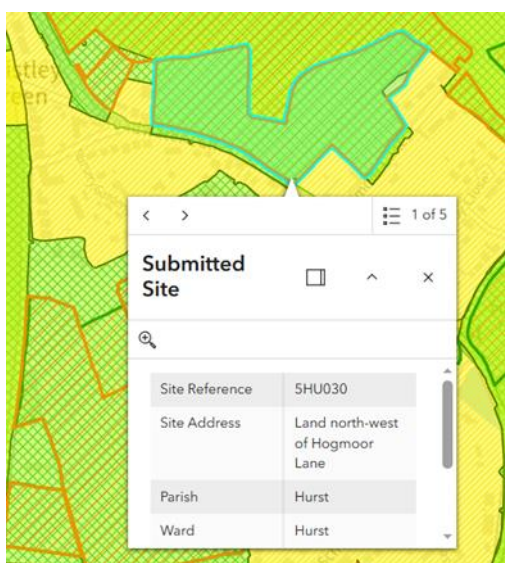


Image 1 (Submitted Site 5HU030).

There is no doubt that this was a controversial site submission, but ultimately, given an enormous amount of time assessing and reassessing the site, **WBC concluded that 5HU030 was UNSUITABLE for development.** I quote WBC's comment on the WBC Officer's Decision Report in the 2025 Appeal (Appendix 1 – page 7)²

'The updated Housing and Economic Land Availability Assessment (2024) acknowledged significant material considerations that impact the site, **rendering the site unsuitable for residential development.** The September 2024 HELAA concluded "The context of the site is considered unsuitable, being inappropriate in terms of established settlement form and pattern, landscape character, and flood risk (which have been identified through representations)."

- ii) This site has been persistently the subject of numerous planning applications since 1956 as per the Appellants evidence (SOCG)³ in the latest planning application/appeal dismissal (**see Image 2**). **All of these have been consistently refused by WBC.** Planning history is a material consideration.

² [ViewDocument](#) Officers Decision Report dated 12 March 2024

³ [Statement of Common Ground](#)

- 3.12 The Council have provided scanned copies of historical planning application records for applications which included the appeal site and an additional land area. Of the shared records the following relate specifically to the site:

Application reference	Description of Development	Decision	Date
3/56	Outline application for residential development	Refused	03.01.1956
O/259/62	Outline application for residential development	Refused	08.01.1963
O/163/64	Outline application for 5 dwellings	Refused	26.08.1964
15248	Outline application for residential development 9.75 acres	Refused	09.04.1981
15249	Outline application for residential development 8.9 acres	Refused	09.04.1981

Image 2 – Planning History up to and including 1981.

In addition to those applications refused in Image 2, the land has been ‘Dismissed’ by 2 appeals in 1999 and the other more recently in 2025.

The appeal Inspector states in 1999⁴ THAPP/X0360/A/98/298932/P9 (Paragraph 5) with reference to Hogmoor Lane *‘The site lies also within the green gap between Hurst and Twyford. The aim of the green gap policy is to maintain physical and visual separation between settlements in order to retain their distinctiveness and their open rural setting’*.

The requirement of a gap between settlements still applies (green or otherwise), if anything it is now even more significant than ever, because this land also serves as an important gap between the identified and agreed separate historic settlements of Whistley Green and Hurst.

The Inspector then goes on to state (with regard to Hogmoor Lane): *The appeal site has a frontage of about 80m-90m to Hogmoor Lane, which I consider forms a substantial gap in the street scene, greater than what would normally be termed an infill plot, and which makes a significant contribution to the semi-rural character of the Lane.*

The views, gaps and policy intent have not changed since 1999 and therefore this argument still holds.

The recent Planning Appeal⁵ for Planning Application 240583 for 9 dwellings on Land NW of Hogmoor Lane, Hurst, RG10 0DH was dismissed in 2025.

The appeal was dismissed, on the grounds of harm to the veteran trees, and harm to the setting and significance of the designated heritage buildings and that the proposal would conflict with CC03, TB24 and TB26 of the MDLP. Although some of the harm to the veteran trees has been mitigated, this is not the case with regard to the harm to the heritage assets.

iii) Significant Harm to the Heritage and Non-Heritage Assets: The introduction of development on this greenfield site, will continue to significantly harm the setting of the heritage assets, the non-heritage assets and undermine the Area of Special Character.

iv) Substantial Harm to the verdancy of the Green Route: The proposed bell mouth access to the internal road and development requires removal of 20 metres of boundary vegetation. However the application fails to mention the requisite 2.4metre set back required and the considerable visibility splays either side of that access that will be required to adhere to

⁴ THAPP/X0360/A/98/298932/P9 for 5 dwellings, Hogmoor Lane

⁵ APP/X0360/W/25/3359898 Shorewood Homes for 9 dwellings on Land NW of Hogmoor Lane, Hurst.

the safety of the vehicles entering and exiting from the site on to the A321. All of this will be significantly detrimental to the street setting, historical landscape views and the ASC.

v) Significant Harm to the Proposed Valued Landscape Area (PVLA)

WBC carried out a Valued Landscapes Assessment in September 2024⁶ for the Emerging LPU and this area is included in **the Haines Hill PVLA** as defined in the Policies Map under Policy NE6. Policy NE6 states that Development proposals located within or affecting a valued landscape should have particular regard to the following attributes:

2a) Landscape quality (condition); b) Scenic quality; c) Rarity; d) representativeness; e) Conservation interests; f) recreation value; g) Perceptual aspects; and h) Associations.

NE6 further states: (3) Development proposals affecting valued landscapes will only be supported where they protect and, where appropriate, integrate with and/or enhance the special features, characteristics and qualities of the landscape, unless the benefits of the development in that location clearly outweigh the harm.

Although NE6 alongside the LPU have yet to be adopted, nevertheless, the emerging LPU does carry some weight and it is evident that **this PIP application is inappropriate, does not integrate or enhance the special features, characteristics and qualities of the landscape. The derisory benefits do not outweigh the significant harm.**

Despite the applicants protestations during the LPU consultations that Haines Hill PVLA designation should not be included, WBC have maintained their stance. The applicant has also stated that PVLAs are probably going to be scrapped in the forthcoming NPPF, which is still under consultation (ends 10 March, 2026) and they have no evidence to support this claim.

vi) Harm and conflict to wildlife corridor associated with the Local Nature Recovery Strategy and local Biodiversity Opportunity Areas,

Since the most recent application appeal for 9 dwellings, the Berkshire Local Nature Recovery Strategy (LNRS) has been adopted. This PiP site is directly opposite the designated Berkshire LNRS site between Lodge Road and Tape Lane and the access to this greenfield site is currently used as a wildlife corridor, between important wildlife areas. Under the PIP application illustrations, it would appear that this access will be closed off.

Therefore this application under NPPF Paragraph 192 FAILS to protect and enhance the very evident biodiversity and geodiversity on and around the site area. The application FAILS to include a wildlife habitat corridor before, during and after the construction, which would allow the existing mammals including foxes and deer who regularly use this site to travel unharmed through and around the development from the existing **Haines Hill Biodiversity Opportunity Area** leading through to the **adjacent LNRS** and beyond to the existing **Loddon Valley Gravel Pits Biodiversity Opportunity Area**.

vii) Harm to the visual amenity enjoyed by those travelling along Hogmoor Lane and Broadwater Lane .

The Hogmoor Lane aspect of the site affords those walking, horse riding , cycling to enjoy the rural aspects and historic setting which are both tranquil and historic. The introduction of development along this gap would result in a significant loss of this visual amenity.

⁶ [VALUED LANDSCAPES ASSESSMENT](#) WBC 2024

To make matters worse, the proposed development site alongside Hogmoor Lane is far higher than the Lane itself and any development will be overbearing and will significantly dominate the rural street scene as well as hide the rural and tranquil views.

The open view for those travelling along Broadwater Lane (A321) will be lost as the applicant, in an effort to 'disguise' the development is illustratively suggesting (although none of this is binding at Stage 1 PIP) to plant trees and set the dwellings back by about 27 metres. However, all this does is create a 'barrier' both built and grown, which will remove the ability to look across the fields and beyond. It would also look completely at odds with the rest of the frontage of the A321. The introduction of the bell mouth entry and mandatory visibility splays will change the scene and amenity beyond recognition and harm the rural and historic setting the residents of Hurst value and enjoy.

viii) Loss of Agricultural Land – This is not some small, unused, parcel of scrubland.

Currently this land is classified as Best and Most Versatile (BMV) and is being used for grazing cattle and sheep which are providing good quality food to the local residents and hospitality in the area; This is a highly sustainable operation, requiring very little food miles. As more and more agricultural fields are being developed, it is important to retain as much local food production as possible to mitigate reliance on importing food less sustainable.

vix) This site is unsustainable – it is contrary to Current Policies CP1 and CP6

Hurst has very basic facilities- it has a poor bus service, no chemist, GP surgery (or a bus service to the nearest surgery), large supermarket, or secondary school. The Village shop carries a very limited supply of goods mostly aimed at passing trade, rather than the community and family weekly shopping needs, and there is no Post Office. All of this means that the future residents will be overly reliant on the motor car to access these services.

It is not convenient or safe to walk or cycle to Twyford. Despite the applicant implying that the site is sustainable and that the residents could catch a train to London in the morning, in reality, it does not work like that. In reality, you do not walk or cycle, because it isn't within acceptable walking distance, the residents would have to cross over the A321 3 times to safely walk to the station in all weathers and mostly in the dark in winter; Cycling is dangerous along the A321 with no designated cycle routes – Twyford Station is renowned for bicycle theft, it is so common that it no longer is worth notifying the police.

The inadequate bus service has been acknowledged and proven to be one of the most unreliable routes provided by Thames Valley Buses and this has been used as evidence in all appeals. But even if the resident was fortunate to catch a bus, on time, what the applicant fails to mention in Paragraph 44 (Page 9) of the Shorewood Homes application cover letter is that the last bus finishes well before the commuter from London is able to get back.

So what is the lived experience? There is no parking provision at Twyford Station beyond 07.00 on weekdays and this is set to get worse once the parking along Broadhinton (Hurst Road) area is banned. Therefore the residents will, as do most commuting residents of Hurst, have a lift to the Station and then another lift when they return. This means that the amount of car journeys double each end of the day – we all do it and I defy anyone to say anything different.

There is nothing in the PiP application that will provide a safe choice of sustainable transport alternatives. The PiP does not minimise the overreliance of the motor car, either for the new residents or the existing community.

To quote the WBC Planning Officer in his Decision report (Page 11) of the previous planning application for 9 dwellings : ***“Thus, whilst the impact on the wider highway network may be***

modest, development in a location where residents have no choice but to utilise private vehicles for day-to-day services is unsustainable and thus contrary to CP1 and CP6.

vx) Exacerbation of Flood Risk to nearby properties and the wider area:

The Supplementary Statement on Flood Risk for the PiP has chosen to ignore the S19 WBC Flood Investigation Report (2024) which highlights that Hurst is mostly a functional flood plain and that there is a 1 in 3 year likelihood of flooding due to a storm event in the locality of the site.

Whilst the applicant confirms that the proposed dwellings, with the caveat they all have raised floor levels over and above the norm, will not flood, in choosing to ignore the WBC Flood Investigation Report 2024 findings, and excluding the SuDs Attenuation basin within this application and the PiP itself is non-binding, **the applicant cannot and has not accurately provided evidence that confirms this development will avoid increasing or reducing risks of or from, all forms of flooding (including from the groundwater) to the nearby properties and the wider area.**

To conclude:

I believe this particular PiP application blatantly abuses the planning application process and by deliberately omitting a vital, functional, interdependent facility, WBC cannot possibly accept that it fulfils the PiP criteria and therefore WBC will not be able to ensure that the full scope of this proposed development's impact is considered when making a decision.

Even if WBC choose to consider this PiP application to be within the criteria of a PiP application it still does not adhere to the current local plan policies, neither does it align with the emerging plan policies.

The development of this site will significantly harm an important historical area of the village which WBC has included within the PVLA and have continuously acknowledged by refusing, and defending against development in the most recent application for 9 dwellings and the previous planning applications/appeals since 1956.

The real world benefits or any benefits are minimal and do not outweigh the significant harm that will be caused by this development

This development conflicts with Policy CP1, it cannot demonstrate that it will reduce the need to travel by private car, neither can it ensure the provision of adequate drainage. It does not avoid increasing (and where possible reduce) risks of or from all forms of flooding (including from groundwater).

For the reasons given above this application, like all those applications beforehand, should be REFUSED.

Lou Robinson