



March 4th 2026

Dear Dr & Mrs Lade

Objection to Permission in Principle (PiP) Planning Application 260353 for the Proposed Erection of a Maximum of 7no and Minimum of 5no dwellings including Formation of an Access from Broadwater Lane

Land North of Broadwater Lane, RG10 0DS and West of Hogmoor Lane, Hurst RG10 0DH

Thank you for the final version of your letter of objection to the above application incorporating my suggestions. The letter is extremely thorough and compelling in its reasoning, powerfully supported as it also is by the Rebuttal Heritage Statement by Dr Richard Massey. It is clear that this application does not come close to overcoming key reasons for refusal of the previous application as set out in the Inspector's DL of 17th October 2025 on a site which substantially overlaps with the site boundaries for this PiP application. Altering the boundaries and moving the access may have addressed the limb of the refusal relating to specific veteran trees but the refusal was far more fundamentally rooted in the heritage harm to the setting of the listed buildings etc.

Clearly in making this application the applicant has been moved to attempt a last throw of the dice before the Councils housing land deficiency is erased on the adoption of the new Local Plan, anticipated to be comfortably before the end of this year. Thereafter any hopes of winning permission will completely and demonstrably evaporate, particularly in light of the Appeal Inspector's findings.

However, I consider that the position with this application is in reality no rosier for the applicant. I have noted various appeal decisions in which the Inspectors have been resolutely unwilling to grant permission on the basis of serious housing land deficiencies where a new Local Plan is within sight of eradicating them. That is a correct and logical approach and of course chimes with our observation that, if permitted, the appeal proposal would result in permanent loss and harm, whereas the current HLS deficiency is ephemeral and in sight of being removed. Accordingly it can carry little weight and is manifestly outweighed by the harms you and Dr Massey have expounded, and which the Council will doubtless also now expound in line with their previous reasoning and conclusions.

Kind regards

John

John S Brearley LLB, M.A. Environmental Law, Legal Associate RTPI

42 Rectory Avenue, High Wycombe, Bucks, HP13 6HW

Tel: 01494 512775

Email: johnbrearley@jsbplanning.co.uk

Website: www.jsbplanninglaw.co.uk