

SHOREWOOD

HOMES

Connie Davis, Principal Planner
Development Management
Wokingham Borough Council
By email only

8 July 2026

Dear Mrs Davis

**PERMISSION IN PRINCIPLE APPLICATION FOR THE CONSTRUCTION OF A MAXIMUM OF 2 HOMES
(AND A MINIMUM OF 1), INCLUDING FORMATION OF ACCESS FROM HOGMOOR LANE, HURST**

PLANNING PORTAL REFERENCE: PP-15064782

I enclose for your consideration a Permission in Principle (PiP) application comprising the following:

- Application form and fee
- Cover letter & planning assessment
- Proposed Site Plan – 2 Units (8543 F08) – Radley House Partnership *illustrative plan showing 2 homes*
- Location Plan (8543 L02) – Radley House Partnership
- Flood Risk Assessment (02/07/26) – Calibro
- Transport Note (10 June 2026) – itransport
- Heritage Statement (January 2026) – Asset Heritage
- Arboricultural Implications Report incl. Tree Protection Plan (February 2026) – SJA Trees

The Application Site

The Application Site is to the west of Hogmoor Lane and is an infill site between residential properties to the north and south, and the opposite side of the road. To the west is retained agricultural land.

The site boundary excludes the veteran tree buffer to the rear of the neighbouring property, Long Barn, to the south-west.

An access onto Hogmoor Lane would be formed.

The Proposal

This is a Permission in Principle (PIP) application that seeks to secure the principle of residential development for a minimum of 1 home and a maximum of 2 homes.

The PIP consent route has two stages, the first stage being this permission in principle stage, and the second stage being Technical Details Consent (TDC) when the detailed proposals are assessed.

Having regard to the recent planning appeal (for 9 homes) and subsequent PIP (for 5-7 homes), supporting information in respect of surface water flood risk, highways and for information heritage and trees is submitted.

These homes could be self-build and this will be decided at the TDC stage.

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Shorewood Homes Ltd is registered in England under company no. 10670389

Relevant Planning History

Of relevance to this PiP application are the following:

- **March 2026** – permission in principle application refused for the proposed erection of a maximum of 7no dwellings (or a minimum of 5no. dwellings), including formation of an access from Broadwater Lane (WBC Ref. 260353). This was appealed in June 2026 (PINS Ref. 6011047).
- **October 2025** – appeal dismissed for an outline application for the erection of 9no. dwellings and associated access on land north of Broadwater Lane (WBC Ref. 240583, and PINs Ref. APP/X0360/W/25/3359898).
- **January 1999** – appeal dismissed for 5 detached dwellings and garages at Hogmoor Lane (PINs Ref. T/APP/X0360/A/98/298932/P9).

Response to previous PiP decision

The recent PiP (Ref. 260353) was refused on three grounds, in summary:

1. Development in the countryside
2. Impact on the Village Centre (Hurst) Area of Special Character
3. Impact on four grade II listed buildings (Bower Cottage, Parkers Cottage, Elder Cottage and Wards Cross House).

This PiP application responds to the recent PiP refusal (260353) with a materially different application – reduced site area (0.48ha), wholly as infill development on Hogmoor Lane, maximum of 2 homes, and accessed via Hogmoor Lane.

The application has no impact on designated heritage assets per the previous PiP application.

The site is in the countryside and is adjacent to the boundary for the Area of Special Character – but the previous appeal noted the Inspector’s concern was in relation to 2 oak trees (T14 and T16) along Broadwater Lane and this is no longer a relevant consideration.

NPPF para 11 sets out the presumption in favour of sustainable development. Notably Paragraph 11(d), which states:

- ‘d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*
- i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or*
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.’*

Footnote 8 defines ‘out of date’ as where ‘the local planning authority cannot demonstrate a five-year supply...’. There are no strong reasons for refusing development per footnote 7 of the NPPF.

In respect of Housing Land Supply, the Council has only 2.5 years supply (as of 31 March 2025 – report published August 2025). The tilted balance as set out in NPPF para 11 is engaged as the most important policies are out of date and planning permission should be granted. This is relevant in respect of development in the countryside and adjacent settlements to meet the housing land supply shortfall.

The draft Local Plan Update includes Policy SS4: Development within and adjacent to minor settlements (this includes Hurst) whereby (2) allows as an exception proposals for limited residential development adjacent to minor settlements where (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.

Supporting paragraph 5.21 defines this as “...the development of a small gap in an otherwise continuous frontage, such as a row of dwellings or the small-scale redevelopment of existing properties within such a frontage...”. This is applicable here with dwellings either side of the site along Hogmoor Lane.

The development plan in Wokingham is very dated, comprising the Core Strategy (2010) and the Managing Development Delivery DPD (2014). The plan period runs only until 2026. The following policies were cited by the Council in the previous PIP decision notice and the Officer Report (OR) and are relevant for assessment purposes. The emerging Local Plan Update is still only a material consideration at this stage.

Core Strategy

- CP1 Sustainable Development
- CP3 General Principles
- CP4 Infrastructure Requirements
- CP5 Housing mix, density and affordability
- CP6 Managing Travel Demand
- CP7 Biodiversity
- CP9 Scale and Location of Development Proposals
- CP11 Proposals Outside Development Limits
- CP17 Housing delivery

Managing Development Delivery DPD

- CC01 Presumption in Favour of Sustainable Development
- CC02 Development Limits
- CC03 Green Infrastructure, Trees and Landscaping
- CC06 Renewable energy and decentralized energy networks
- CC07 Parking
- CC09 Development and Flood Risk
- CC10 Sustainable Drainage
- TB05 Housing Mix
- TB21 Landscape Character
- TB24 Designated Heritage Assets
- TB26 Buildings of Traditional Local Character and Areas of Special Character

Other material considerations

- Local Plan Update (at examination)
- Wokingham Council Borough Design Guide SPD (2012)
- Landscape Character Area Assessment (2019)
- NPPF
- A Design for Hurst

1999 Planning Appeal

There was an appeal dismissed in January 1999 for the construction of 5 houses fronting Hogmoor Lane (PINS Ref T/APP/X0360/A/98/298932/P9) (**Appendix 1**).

That decision was 27 years ago under a very different national and local planning policy context. That appeal was for 5 houses and this PiP application is for a maximum of 2.

Para 5 of the 1999 Decision Letter (DL) noted the site frontage of 80-90m as a substantial gap in the street scene, that made a significant contribution to the semi-rural character of the Lane, and the site appeared as an integral part of the green gap between the village and Twyford. The inspector added that

development would be widely visible as a significant incursion into the relatively narrow belt of open land.

The “green gap” designation no longer applies. Furthermore, the 2025 appeal considered there were no adverse landscape effects. Whilst that related to development fronting Broadwater Lane, this is similar in spatial terms and suggests this is no longer a relevant consideration (and the same applies to the statement in para 7 of the DL regarding character).

Para 6 considered the proposed houses would be closely spaced with about 2-3m between most dwellings and stated the effect would be a relatively densely built-up frontage with few visual gaps. The indicative layout in this PiP application shows scope for significant spacing between the houses and neighbouring homes, and the provision of only 2 houses along Hogmoor Lane is not dense. There are 4 existing houses immediately to the north occupying a similar frontage width (with similar set back from the road).

Para 7 discussed the Environment Agency’s suggestion of a condition for a 4m planting zone from the top of the banks. This can be achieved through the detailed TDC stage, and the proposals are capable of having no effect upon the drainage ditch and surface water flood risk – see the Calibro Flood Risk Assessment.

Para’s 8 and 9 of the DL noted the narrow width of Hogmoor Lane and risks of the junction onto Broadwater Lane. This PiP application proposes access onto Hogmoor Lane and the itransport Transport Note should be read. That note identifies two dwellings would only generate 1-2 two-way vehicle trips in the morning and evening peak hours, a minimal impact on the highway network and well below the high bar set out in the NPPF.

Some 12-13 properties are served directly from Hogmoor Lane and traffic flows are low. Access to the site would be via a crossover/driveway access and low flows would not cause a highway safety issue. The itransport proposals show there are access options for traffic entering/exiting Hogmoor Lane from Broadwater Lane that can be secured via the subsequent Technical Details Consent providing adequate visibility splays in both directions.

Application Summary

1. This application seeks permission in principle for a maximum of 2 dwellings (a minimum of 1).
2. The site is within the designated countryside but is immediately adjacent the settlement boundary (and existing residential) on three sides to the north, east and south for the Limited Development Location of Hurst. Development would not undermine the primary purpose of policy CP11.
3. Spatially, the proposal represents a logical infill development with existing housing either side and opposite and a limited scale of development appropriate to the size of the village.
4. There will be the loss of a limited amount of agricultural land. This would have a negligible degree of very localised harm to the character of the area with linear development reflecting the character of the area.
5. There are no technical grounds to withhold permission in principle when considering matters such as highways, flood risk/surface water drainage, arboriculture, heritage for only 2 dwellings (maximum). Matters concerning full detailed design will be considered at the TDC stage.
6. In recognising Paragraph 11(d) of the NPPF, the ‘tilted balance’ is engaged due to the Council’s failure to meet its required housing land supply, and the proposal would perform a positive social, economic and environmental role.
7. Paragraph 11(d)(i) is satisfied because there are no strong reasons for refusing development (there will be no harm on designated heritage assets as alleged by WBC in the previous PiP, and this is entirely resolved).
8. Details are provided on highways and surface water drainage to demonstrate acceptability. In any instance this would be a matter for a subsequent TDC.

9. In weighing up: there is conflict with the Development Plan in terms of the site's countryside location, however, key policies are out-of-date due to the lack of an up to date five year housing land supply; there is no harm to the significance of the setting of designated heritage assets: no harm to the setting of Non-Designated Heritage Assets (NDHA): or to any other matters; and there are identified benefits, in particular much needed housing to address a serious and substantial housing land supply shortfall in the borough and this village. On this matter alone the 2025 appeal DL paragraph 52 gave this matter significant weight, along with other benefits including economic benefits during and post construction, environmental benefits through biodiversity net gain, energy efficiency measures (being limited to moderate benefits), etc., when assessed against the policies in the Framework as a whole.
10. This application should be approved. Whilst this development is for a smaller amount of homes, the need for housing remains significant and must be met without delay and it is not appropriate to downgrade the significance for new homes if its for a lesser amount of development as small scale developments can be delivered quicker and housing requirements rely on windfall sites coming forward.

Constraints:

- Countryside (but adjacent the settlement boundary and adjacent residential to the north, east and south).
- Non-Designated Heritage Assets (Area of Special Character (AoSC) and a house) to the south and east.

Principle of Development

11. The site is immediately adjacent the village settlement boundary on three sides – identified as a Limited Development Location. It is designated countryside and should be assessed against Core Strategy Policy CP11 (Proposals outside Development Limits). None of the criteria in CP11 apply and the application is contrary to the spatial strategy as a starting point.
12. However, the site is adjacent established residential development on three sides and proposed linear development would be characteristic of the locality.

Locational Sustainability

13. The site's suitability from a locational sustainability perspective was established in the 2025 appeal decision (paragraphs 43-46) and the Inspector afforded limited weight to the conflict with development plan policies, noting that facilities such as the school, public house and a shop are close to the site. Para 52 clearly noted "*...the provision of 9 houses within a location that would not be unsustainable for a limited housing scheme.*" This is relevant here. This application continues to represent a sustainable location for the scale of development being proposed. There are no valid planning grounds to suggest this is an unsustainable site for the development of a maximum of only 2 homes. Furthermore, it did not form a reason for refusal in the recent PiP application.

Housing Land Supply (HLS)

14. The 2025 appeal determining Inspector agreed the Council had only 1.7 years HLS (para 58). WBC's most recent published position is only 2.5 years HLS (Five Year Housing Land Supply Statement at 31 March 2025 – published in August 2025), which remains a serious and substantial housing land supply shortfall which is not likely to be satisfied.
15. Small windfall sites such as these are capable of being delivered quickly particularly within the relevant five-year period and can collectively make a valuable and much needed contribution to meeting more of the Borough's housing needs. In consequence of the supply position, those policies relating specifically to the spatial strategy and housing delivery in the Borough's Core Strategy and MDD LP are out of date.

16. The latest Standard Method Housing Need figures for Wokingham (May 2026) is 1,312 dwellings per annum. This is in stark contrast to the Council's emerging Local Plan which sets out a very low annual housing requirement of 795 (1 year) and 748 (16 years) dwellings per annum – only 57% of the Standard Method.
17. NPPF para 11 states plans and decisions should apply a presumption in favour of sustainable development. For decision taking this means where policies which are most important for determination the application are out of date, permission should be granted unless:
 - i. application of policies in this Framework that protect areas or assets of particular importance (Footnote 7) provides a strong reason for refusing the development proposed; or
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.
18. In considering footnote 7 – the two considerations from the previous appeal were irreplaceable habitat (veteran trees) and designated heritage assets (significance of the setting of four Grade II listed buildings to the south of the site). The recent PiP application addressed the issue of irreplaceable habitat but the Council alleged harm to designated heritage assets. This has been challenged by Shorewood Homes in their appeal submission given the material changes to the proposals compared with the dismissed appeal proposals. This application in relocating housing via Hogmoor Lane is sited well away from designated heritage assets and there would be no harm.
19. In the alternative, under NPPF para 11(d)(ii) officers must assess as part of an application whether there are any adverse impacts generated by the development that would significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework as a whole, etc. This is referred to as the 'tilted balance'. whereby harms and benefits are not weighed equally but tilted according to 11(d)(ii). There are no identified harms arising from the provision of two homes that would significantly and demonstrably outweigh the benefits.

Emerging Local Plan Update (LPU)

20. The LPU was submitted for examination in February 2025 and sets out the development strategy and proposed site allocations to meet housing needs to 2040. Part 1 Examination Hearings were held in November 2025 and Part 2 Hearings took place through to the end of June 2026.
21. The most recent Local Development Scheme (LDS), September 2024 stated Examination Hearings (Stage 1) were expected in April 2025 (Table 1), a 7-month delay to the programme. The LDS stated adoption was expected in May 2026. Reflecting the delay to date it is more likely any adoption would not be until at least December 2026.
22. Increased weight to the LPU can be applied (per NPPF para 49), however, it is relevant to note that under the NPPF 2024, because WBC is proposing its housing requirement at 80% or less of the most up to date housing need figure, that NPPF para 78(c) applies whereby as of the 1 July 2026 the Borough must demonstrate a minimum 6 year HLS. This is a material planning consideration whereby the Council continues to have a serious and substantial HLS shortfall until it finally addresses its housing needs through a subsequent Local Plan Review. This further review will take several more years, as a minimum, to conclude.
23. The current standard method requirement is for 1,312 dwellings per annum (dpa). The LPU sets out a housing requirement well below the standard method. This approach will not help deliver the much-needed homes. The Council should be positively working to approve applications.
24. Finally, the wider field was originally identified as a site allocation in the initial versions of the Local Plan Update in 2020, 2021-2022. This allocation was only removed at the Pre Submission stage in 2024. The LPU makes no provision for any allocations in the settlement of Hurst despite this being a time when the Council should be significantly increasing the number of site allocations.

Summary of the principle of development

25. The site is outside the defined settlement area and in the countryside, but is immediately adjacent the defined settlement boundary on three sides and would represent appropriate linear development characteristic of surrounding housing.
26. The site is not in an unsustainable location for the scale of housing proposed within the village, a Limited Development Location.
27. This application has positively responded to the Inspector's findings in the previous appeal and the recent PiP refusal.
28. There would be no harms that would significantly and demonstrably outweigh the benefits when assessed against the NPPF when read as a whole.

Location, Land Use and Amount of development in relation to the impact on character and appearance of the area.

29. The 2025 Appeal Inspector concluded he was *"...not confident that the appeal site should be considered as part of a valued landscape based on current evidence"* (DL para 41) and noting the draft NPPF 2025 does not reference Valued Landscape (VL) this is not a material consideration. Also noting it was not a reason for refusal of the previous PiP application.
30. The site has no landscape designations that preclude development, as stated by the Inspector *"...the proposals could be integrated into the landscape setting without any significant adverse landscape effects"* (DL para 39). These same conclusions apply to this PiP application site. The location is capable of satisfactorily accommodating limited residential development and this application proposes fewer homes compared to the appeal proposal, a maximum of 2, as opposed to 9 originally.
31. There is no basis to suggest the limited scale of development would be harmful to the landscape character of the area. Any visual impacts would be highly localised from viewpoints on Hogmoor Lane and read clearly in context with established built form adjacent the site boundaries. The TDC application would show landscape plans to reinstate the boundary planting which existed on-site until its unauthorised recent removal.
32. The red line area is less than 0.5ha with a maximum of 2 homes. This represents a quantum and density appropriate to the character of the area with significant space between and around homes as indicated on the illustrative plan maintaining views to the countryside beyond.
33. Residential development would be appropriate in this location where existing housing is immediately adjacent to its north, south and east.
34. The new homes would be capable of delivering homes in a linear configuration and with similar set back to neighbouring properties accessed by an access drive over the highways ditch – as exists to neighbouring properties to the north.
35. Development would not prevent agricultural use for the remainder of the field. There is scope to achieve appropriate boundary treatment and planting to all boundaries.
36. The officer report to the previous PiP application stated the potential for 4 dwellings on Hogmoor Lane would be denser than found elsewhere on Hogmoor Lane. There are only 2 dwellings (maximum) in this application, which directly addresses the 'higher density' allegation coupled with the removal of the previous 'internal road arrangement'. There can be no possible contention 2 houses accessed via a drive on to Hogmoor Lane would give an 'estate appearance' nor any urbanisation effect.

Location, Land Use and Amount of development in relation to the impact on neighbouring amenity

37. There are residential properties close to the north, south and east. The Officer Report to the previous PiP application agreed the location and amount of development could be accommodated without detrimentally affecting neighbours. This remains the case with this

application – with fewer homes possible along Hogmoor Lane and adequate separation distances of buildings possible from neighbouring homes – and this can be secured at the TDC stage.

Location, Land Use and Amount of development in relation to the highway network

38. A difference from the previous appeal and the recent PiP refusal is that highways access will be via Hogmoor Lane, not Broadwater Lane.
39. The Highways Officer in the previous PiP application noted no objection on site sustainability for the erection of up to seven dwellings. The same conclusion applies to these proposals for a maximum of two homes in a suitable location.
40. The Highway Officer noted the traffic generated from up to seven dwellings would be unlikely to have significant impacts on the wider highway network and the site is a sustainable location for small-scale development. Two homes is an appropriate land use in this location.
41. Seven homes were not significant. Therefore, the amount of two homes is appropriate. The proposals satisfy the tests.
42. A Transport Note from itransport accompanies this application to consider this in further detail. A dismissed appeal in 1999 for five homes via Hogmoor Lane is referenced which included concerns on highway safety due to restricted visibility at Hogmoor Lane. Noting that decision is 27 years old. The Transport Note demonstrates three potential junction options to improve the junction, if necessary, at the TDC stage.
43. A development of two dwellings would generate 1-2 two-way trips in the morning and evening peak hours. This will result in a minimal impact on the highway network and well below the high bar set out in the NPPF.
44. Hogmoor Lane is a rural road serving a limited number of properties and is subject to a 30mph speed limit. Some 12-13 driveways are served directly from Hogmoor Lane and traffic flows are low. Access to the site will be via a crossover/driveway access having an imperceptible impact on the operation of Hogmoor Lane.
45. Three potential junction options have been identified at the Hogmoor Lane/Broadwater Lane junction (designed to Manual for Streets principles) to provide flexibility in determining the most appropriate solution at TDC stage. These are shown in the itransport note and show:
 - **Option 1** junction remains as existing;
 - **Option 2** junction layout with revised access and exit priorities; and
 - **Option 3** existing junction reconfigured to new simple priority layout.
 - Options 2 and 3 achieve 2.4m x 43m visibility splays onto Broadwater Lane.
46. Compared to the 1999 appeal, this PiP application is for only 2 houses, not 5. With a minimal impact from traffic generation from only two houses this has a negligible impact on the operation of the road and very limited potential for conflict between vehicles and users of the lane.
47. The 1999 appeal noted Broadwater Lane at that time was a 40mph road. It is now 30mph.
48. The provision of only two homes would not result in a significant increase in the use of this junction and itransport has demonstrated realistic options are available to the junction, capable of being secured at the TDC stage.
49. The proposals will satisfy Core Strategy policy CP6 as it provides for sustainable forms of transport (accessibility to local services and facilities), has a negligible impact on the transport network, and does not cause highway safety issues.

Location, Land Use and Amount of development in relation to flood risk

50. The site is entirely within Flood Zone 1 (low risk) with an area of surface water flooding at the site in the form of a highways ditch parallel to Hogmoor Lane. A proportionate Flood Risk Assessment (Calibro) accompanies this application.
51. Evidence for the ditch is based on a topographic survey and LIDAR data.
52. The Risk of Flooding from Surface Water (RoFSW) datasets show predicted surface water flooding is present in the 0.3m depth band but not in the 0.6m depth band indicating flooding predicted

would be between 0.3m and 0.6m deep and restricted to the southern section of the ditch (reducing to 0.075m and 0.2m in the north).

53. Topographic data indicates the ditch has an approximate depth ranging from 0.52m and 1.03m. Therefore, the RoFSW predicts surface water is contained in the ditch and not impacting the site.
54. The vegetated nature of the banks means the EA's RoFSW modelling likely under-represents the presence and capacity of the ditch meaning surface water flows would be contained in the ditch channel.
55. There is no continuous flow route along the ditch alignment. This discontinuous representation provides further evidence the ditch is not accurately captured within the EA's RoFSW modelling. Existing culverted crossings present a restriction to the flow of water in the ditch but the 'breaks' in the mapping demonstrate the modelling presumes blockage to the flow that in reality are not likely to be present and this provides evidence the risk is overestimated.
56. The site has a low risk of flooding from surface water.
57. Providing access across the ditch is already present in multiple locations along the ditch, and this would provide safe access and egress from the site, with a single access point serving the 2 properties. Calculations of the likely capacity of the ditch and crossing location is presented in the Calibro report.
58. The proposed culvert capacity would be greater than the existing culverted crossings and therefore not presenting a restriction to watercourse flows.
59. The FRA demonstrates development will be safe for its lifetime and not increasing flood risk elsewhere, therefore, meeting the requirements of the NPPF.
60. As with the previous 2025 appeal, separate drainage details such as swales and basin would follow at the detailed TDC stage (and are indicated on the illustrative layout and the swale is shown beyond any tree buffer). This was not a matter disagreed by the Council or the Planning Inspector.
61. In accordance with MDD DPD policy CC09 all sources of flood risk have been taken into account, development is wholly in Flood Zone 1, and a suitable and appropriately detailed flood risk information accompanies this PiP application.

Location, Land Use and Amount of development in relation to the impact on the natural environment (trees and ecology)

62. The Council is fully aware that a full suite of ecological surveys has been undertaken for the 2025 appeal site. These, and site-specific surveys for this PiP application site are not required to be submitted at the PiP stage. They would be at TDC stage. The entire field (including the Hogmoor Lane area) has been subject to surveys by LUS Ecology.
63. Trees were a matter of disagreement with the previous appeal, which necessitated the amended layout in the recent PiP application. Impact on trees was not a reason for refusal in that refusal. No trees are affected by this application and for completeness the previous PiP application's Arboricultural report is provided for information purposes, as it confirms the location of the veteran tree buffer for the oak to the site's south-west boundary (in the rear garden of Long Barn), i.e. that the application site is not in the buffer and there will be no impact. An application specific tree report would follow at the TDC stage.
64. Adequate protection measures can be ensured to protect trees. There would be no adverse impact on irreplaceable habitats or other tree or ecology considerations.

Location, Land Use and Amount of development in relation to the impact on the historic environment (designated heritage assets and non-designated heritage assets)

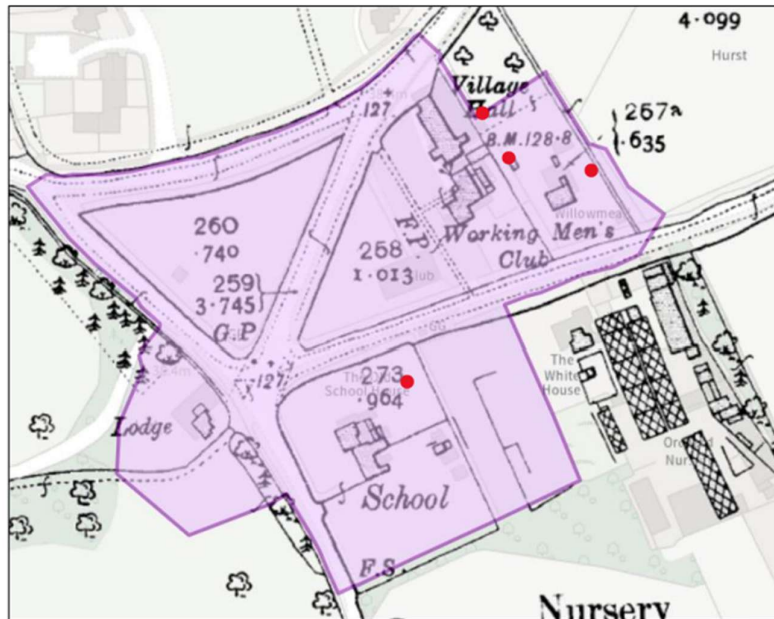
65. The previous PiP application's Heritage Statement is provided for information purposes. An application specific report would follow at the TDC stage.
66. There is no impact to designated heritage assets (i.e. grade II listed buildings) as cited in the previous PiP application.

67. At the PiP stage, architectural details are not required to be provided. That is a matter for the TDC stage. It would be appropriate to design traditional vernacular homes to reflect local character, and this can be controlled via the TDC application. The maximum floorspace in a PiP application is under 1,000sq.m. The limited (& maximum) number of homes on the site area of less than 1ha will enable spacing between and around the homes, maintain separation to site boundaries and significant set back from the highways as clearly shown in the illustrative layout provided thereby mitigating the low level of harm.
68. The remaining heritage issue is in respect of Non Designated Heritage Assets (NDHA's). Namely from the previous PiP application, this is in respect of the Area of Special Character (AoSC) which runs along the southern boundary adjoining Long Barn before crossing east over Hogmoor Lane.
69. The Asset Heritage's Heritage Assessment did not identify any harm to the setting of the AoSC, in particular:
 - Para 4.5 *"the rationale for the local designation ... derives primarily from its historic built environment (its townscape), including its listed buildings..."*
 - Para 4.6 *"The application site, as fields on the edge of the village, do not contribute to the architectural townscape interest and are, rightly, not included in the AoSC"*.
 - Para 4.9 – there are no public views from the AoSC directly across the Hogmoor Lane part of the site, and the site does not frame views of, or form a significant backdrop to the AoSC, or key views of the historic buildings and does not make any appreciable contribution to its significance.
70. The Council's conclusions to the previous PiP application regarding the impact to the AOSC overstated the likely effects of development.
71. The Inspector's unambiguous concern (in the 2025 appeal) regarding the AoSC arose from potential impacts upon veteran trees T14 and T16, which were considered important contributors to the significance of the AoSC. Those trees are unaffected by the current proposal, and the Council accepts that position.

Willowmead, Hurst & AoSC

72. Reference is made to 'Land between School Road and Orchard Road, Hurst' (known as the 'Willowmead' site, WBC Ref 230074, PINS Ref APP/X0360/W/24/3342812). The proposed development for 23 dwellings and 15 car parking spaces for the primary school was allowed at appeal (decision letter dated 11 October 2024, **Appendix 2**). This example is relevant as it indicates an inconsistent approach to decision making by the Council – where the Inspector at Willowmead concluded there was no impact, yet the Council sought to continue to cite impact to the setting of the NDHA in the recent PiP application.
73. Area of Special Character (AoSC) was a consideration in the Willowmead appeal (see **DL para's 30/31**). The relevant AoSC there was 'The Old School House'. The text and plans of The Old School House AoSC are set out on pgs 74-76 of the Historic Environment Topic Paper C (**Appendix 3**).
74. Accepting it is a different AoSC to this application's AoSC, they are both NDHA's, are in the same settlement, and both adjoin the boundary of application site areas for residential development (albeit the Willowmead proposal was for major development in a Limited Development Location).
75. Figure 3 shows the location of The Old School House AoSC (purple shading) and the Willowmead site for 23 homes is immediately adjoining the AoSC to the east.

Figure 3. 1933 OS Map showing the extent of the ASC.



1933 OS map

• Red dots are undesignated Heritage assets

76. Inspector Sargent in the Willowmead appeal stated **DL para 31** *'The field subject of this appeal allows the eastern side of the ASC to be readily apparent. Willowmead is notable at the southern end of this boundary, as is the relatively blank, plain roof of the village hall behind, with the taller pre school building being nothing more than glimpsed in between. Little of the ASC can therefore be appreciated from here. Therefore, taking a balanced judgement on this matter, and mindful that a sliver of the ASC encroaches into the south-west corner of the appeal site, the effect of the proposal on that non-designated heritage asset and its setting would not harm its significance, and so would retain any traditional, historical, local and special character the area may possess.'* (underline, my emphasis)
77. **DL para 32** concluded *'Accordingly, I conclude the proposal would not harm the significance of the listed building or the ASC, and so would not conflict with MDD Policies TB24 or TB26...'*
78. The Inspector's conclusions to the previous Broadwater Lane appeal regarding the AoSC are set out at **DL para's 32-34**, with **DL para 32** stating *'...its significance in part sits with its buildings which are of a variety of ages, designs and materials including buildings and features that are designated and non-designated heritage assets in their own rights.'*
79. **DL para 33** notes the site is immediately adjacent the boundary of the AOSC (as with Willowmead and its AOSC) and the site is not referred to as a component of the AOSC setting: *...Broadwater Lane is heavily vegetated on the stretch of road between Hurst Village and Whistley Green, with many mature trees and open fields on the northern side of the street. It can therefore be reasonably concluded that the planting on the boundary of the site including T14 and T16 makes a positive contribution to the significance of the AOSC as a backdrop which frames the buildings within it.'*
80. **DL para 34** concluded *'...given the risk of deterioration associated with the proposal to T14 and T16 on that boundary and the importance of those trees within the boundary planting, the proposal would subsequently cause moderate harm to the significance of the AOSC.'*
81. Inspector Burnham's conclusions on harm to the NDHA was unambiguous in respect of trees T14 and T16 only. That is clearly not relevant in this application because of the revised site location, which avoids any impact to those trees. There is no harm to the setting of this NDHA.

82. The previous PIP's decision notice for reason for refusal 2 (re: NDHA's) cited development plan policies – CP1 and CP3 of the Core Strategy and TB21 and TB26 of the MDD. The wording relates to location and amount of development, its assimilation to the established landscape and character of the surrounding area, and impact to the Village Centre (Hurst) AOSC. The policies are summarised below.
- Policy CP1 Sustainable Development – assumed that of relevance is only (1) maintain or enhance the high quality of the environment. But not referenced in the Officer Report (OR).
 - Policy CP3 General Principles for development – assumed of relevant only to (c) have no detrimental impact upon heritage and landscape; (f) contribute to a sense of place and the way they integrate with their surroundings including use of appropriate landscaping. But only (a) referenced in the Officer Report.
 - Policy TB21 Landscape Character – requires: (1) proposals must demonstrate how they have addressed requirements of the Council's Landscape Character Assessment, including landscape quality, landscape strategy, landscape sensitivity and key issues; and (2) proposals must retain or enhance the condition, character and features that contribute to the landscape.
 - Policy TB26 Buildings of Traditional Local Character and Areas of Special Character – of relevance is (2) permission will only be granted for proposals to or affecting Areas of Special Character where they demonstrate that they retain and enhance the traditional, historical, local and special character of the area and its setting.
83. Policy CP1 is only referenced in the OR's assessment under loss of existing land use regarding Best & Most Versatile agricultural land at pg14, which concludes the reason has limited weight in the overall planning balance. It was not a relevant matter in the previous appeal decision. There is no conflict with Policy CP1.
84. Policy CP3 is referenced in the OR to the previous PiP application (pg15) in respect of criterion (a) appropriate scale, activity, mass, layout, built form, height, materials and character to the area together with a high quality of design. Many of these items are not relevant at the PIP stage. Also, regarding impact on neighbouring amenity – concluding no detrimental effect (pg26).
85. There is no identified harm to Policy CP3 from either PIP proposal.
86. The previous Inspector's conclusions on landscape and character (**DL para 7**) stated '*The fourth main issue is the effect of the proposal on the character and appearance of the area with regard to landscape*') and:
- **Para 39** '*the proposals could be integrated into the landscape setting without any significant adverse landscape effects*'.
 - **Para 41** '*I am not confident that the appeal site should be considered as part of a valued landscape based on current evidence*'.
 - **Para 42** '*... there would be no significant adverse impact on the landscape. There would subsequently be no conflict with Policy TB21 of the MDLP...*'. Also, no conflict with NPPF para 187 was identified.
87. By the same rationale the PiP proposal would not give rise to adverse landscape impacts. The same conclusion as the previous appeal (and PiP application) applies. There is no conflict with Policy TB21.
88. The 2025 appeal cited (**DL para 34**) conflict with TB26 but that was expressly because of '*the risk of deterioration associated with the proposal to T14 and T16 on that boundary and the importance of those trees within the boundary planting, the proposal would subsequently cause moderate harm to the significance of the AOSC*'.
89. The impact to those two trees is not applicable here. There is no harm to the setting of the AOSC and therefore, no conflict with TB26.

Planning Balance and Summary

90. The statutory starting point for determination is the development plan.

91. The site is outside, albeit adjacent, the defined development limits and within the countryside. Ordinarily development on the site would conflict with the spatial strategy of the plan.
92. However, the site is not an unsustainable location for the limited amount of development proposed and would not undermine the purpose of CP11. The amount of development is appropriate in a Limited Development Location such as Hurst.
93. In addition, the Council is unable to demonstrate a 5-year supply of housing, and even with an emerging Local Plan, the transitional arrangements in the NPPF means 6 years supply of housing will be required from the 1 July 2026. The Council has a serious and substantial housing land supply shortfall that will persist for the short to medium term at least. It is important that more sites are urgently brought forward for development.
94. A small housebuilder can deliver developments more quickly than larger strategic sites. Para 73 of the NPPF notes the important contribution small and medium sized sites make to meet the housing requirement of an area and such sites are essential for small and medium sized enterprises such as Shorewood Homes.
95. There are no strong reasons for refusing the development proposed per NPPF para 11(d)(i). Clear justification is presented with this application in respect of addressing surface water flood risk and transport. There is no identified harm arising from any impact to the setting of the NDHA.
96. The tilted balance and presumption in favour of sustainable development is engaged. The proposals will contribute to the three overarching objectives to achieving sustainable development as defined in the NPPF: being the economic, social and environmental aspects.

Economic

97. The site will perform a short-term economic role as a result of the construction period, and a longer-term economic role via consumer spend and CIL payments. The benefit in the provision of new homes from an economic perspective should be afforded at least moderate weight (see 2025 appeal DL para 53).

Social

98. The development would make a valuable and positive contribution to the Borough's housing stock in the creation of new homes at a time where the Council has a significant shortfall in housing land supply. This will persist for a considerable period of time. As with the 2025 Appeal and the previous PiP application, the delivery of new homes needs to be afforded significant weight (para 52 of the 2025 Appeal DL) particularly due to lack of a five year housing land supply.
99. The proposals will contribute to the Government's key objective of significantly boosting the supply of new houses.
100. The new homes would be well connected to nearby services facilities within the Village as identified (see 2025 Appeal DL para's 43-46). The site is well related to existing built form in the Village. This would not represent an isolated countryside development.
101. The social benefits of the proposals are of significant weight considering the Borough's housing needs, which will include the need to provide more housing in villages such as Hurst, which will help sustain local services and facilities, such as the shop and public house.

Environmental

102. When assessing the impact on the character of the area, the layout and density is considered acceptable. The previous appeal decision (and the recent PiP decision notice) recognised this is not a valued landscape and the proposals would not have any significant adverse landscape effects.
103. The illustrative layout demonstrates significant scope for landscaping including new hedgerows and trees which would be secured at the TDC stage.

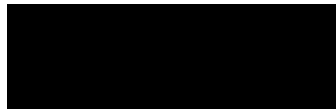
104. The site presents alternative options to the car to access services and facilities elsewhere and is in walking distance to the village's services and facilities. This should be afforded significant weight in the planning balance.
105. The development would expect to achieve more than 10% biodiversity net gain, new planting opportunities and ecological mitigation and enhancement measures. This would perform at the very least, a moderately positive environmental role. The 2025 appeal demonstrated significant biodiversity net gain via off-site land, providing a further benefit to the proposals. The same approach would be applied for this development – to be secured at the TDC stage via a planning obligation.
106. Other measures would include sustainable methods of heating and power including the use of renewables, reduced water consumption, and support to an SME housebuilder attract moderate weight as a benefit having regard to the climate emergency and the housing crisis.

Conclusion

107. The most important policies for determination of this application are out of date by virtue of the absence of a 5-year housing land supply. Paragraph 11 of the NPPF states that permission should be granted unless any adverse impact of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework taken as a whole, or there are specific policies in the Framework which indicate that development should be restricted.
108. As outlined above, the proposal would provide a range of material benefits that weigh either significantly or moderately in favour of the application. The detailed design would follow at the TDC stage and planning conditions can be imposed. That is not necessary at the PiP stage.
109. In light of the above the benefits clearly outweigh any limited harms and when assessed against the policies in the NPPF as a whole. The PiP application should therefore be approved.

We would be grateful to receive confirmation of the validation of this application. Should there be any queries, please contact me at stuart@shorewoodhomes.co.uk and 07500 070299.

Yours sincerely



Stuart Garnett BSc (Hons) DipTP MRTPI

Shorewood Homes

Encl.

Appendices

1. 1999 Appeal Decision Letter PINS Ref T/APP/X0360/A/98/298932/P9
2. Willowmead Appeal Decision Letter WBC Ref 230074, PINS Ref APP/X0360/W/24/3342812
3. Historic Environment Topic Paper C