

**Rosebank
Tape Lane, Hurst
RG100DP**

28 July, 2026

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

FAO Planning Officer, Wokingham Borough Council

**RE: Application 261624 – Land North of Broadwater Lane and West of Hogmoor Lane.
Permission in principle application for the proposed erection of a maximum of 2 dwellings (or
a minimum of 1 dwelling) including formation of an access from Hogmoor Lane.**

I am writing to OBJECT to the Permission in Principle (PiP) application for the following reasons:

I believe that the landowner/developer are ‘gaming’¹ the planning system by submitting yet another application while the previous PiP application (260353) for which this application constitutes 50% of the same site was refused by WBC (30/03/26) is currently at Appeal (6011047). Any determination of Appeal 6011047 will be relevant to this application and I request that WBC defer the decision on this PiP decision until the appeal decision has been determined.

1. Conflict with WBC Development Plan Core Strategy Policy

The current policies still carry weight when making planning decisions, the applicant confirms in their Planning Statement (Paragraph 9) that there is conflict with the current Development Plan:

- a. This PiP application is contrary to WBC Core Strategy Policy CP1 at it does not maintain the high quality of the environment; Ensure the provision of adequate drainage;
Avoid increasing (and where possible reduce) risks of or from all forms of flooding (including groundwater);
Demonstrate how it supports opportunities for reducing the need to travel, particularly by the private car in line with CP6.
- b. This Pip application is outside the development limit for Hurst and conflicts with WBC Core Strategy Policy CP11 as it does not fulfil any of the exemptions.
- c. It is in conflict with Core Strategy CP9 as the location for 2 large dwellings with garages is inappropriate.

2. Conflict with WBC Emerging Policy

The Emerging WBC Local Plan Update (LPU) is currently being examined, with the formal hearing process completed in June 2026. As the LPU is likely to be adopted early 2027 the emerging strategy and policies carry weight.

3. This is not an infill site:

The applicant suggests that this is an infill site, when at approximately 100 metres the frontage is far more than ‘infill’, but has been defined as a ‘gap’. **The appeal Inspector**

¹ Definition - Verb or present participle: Gaming: Manipulate (a situation), typically in a way that is unfair.

states in 1999² THAPP/X0360/A/98/298932/P9 (Paragraph 5) with reference to Hogmoor Lane on exactly the same site stated:

'The appeal site has a frontage of about 80m to 90m to Hogmoor Lane, which I consider forms a substantial gap in the street scene, greater than what would normally termed an infill plot, and which makes a significant contribution to the semi-rural character of the Lane.'

4. Planning History:

The watered-down version of planning history detailed by the application is unacceptable. This ancient field has persistently been the subject of many planning applications from the same landowner since the 1950's. All of which have been either refused by WBC and where necessary, dismissed at appeals. This is a material consideration, whereby WBC and PINS have remained consistent with their approach and this approach should continue.

The Applicants Statement Paragraph 24 is incorrect in that the site (5HU030) was submitted for the LPU and after public consultation and further assessment was deemed in the HELAA (2024 conclusion):

"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)."

5. WBC's Housing Land Supply Trajectory:

Contrary to Applicant Statement Paragraphs 16 and 93 the Council does not have a serious and substantial housing land supply (HLS) shortfall that will persist for the short to medium term at least for the following reasons:

The emerging Local Plan (LPU) has completed the examination hearing and is now well on its way to being adopted in early 2027.

The WBC LPU had reached an advanced stage by early 2025 and under the Government's Transitional Arrangements can still proceed under the current plan making system if submitted by the end of 2026 (which has happened).

The WBC emerging LPU is now very advanced. Has been robustly examined and is now nearing its final inspector's report and therefore it must carry weight.

Having said this, the **current** Housing Land Supply (HLS) position as at 31 March, 2026 shows a deliverable housing supply for period 1st April, 2026 and 31 March, 2031 of between 5.5 years and 6.2 years depending on the calculation and I am sure WBC have every intention of delivering this. This is far more than the 1.7 years HLS the appellant is quoting for the HLS as at 31 March, 2025.

In addition, WBC has over-delivered HLS consistently over the current plan period and yet because of the Government's determination to ignore over-delivery in any planning decision under new NPPF rules, over delivery has been disregarded.

² THAPP/X0360/A/98/298932/P9 for 5 dwellings, Hogmoor Lane

Furthermore, as of 25 June, 2026 WBC have commenced the new Local Plan 2045 and the call for sites started on 6th July, 2026. These new Local Plans are expected to be prepared and adopted within 30 months and commencement of the new plan is required to be within 5 years after the adoption of the existing plan.

WBC is not a failing Council when it comes to HLS; WBC have delivered (over-delivered) and will continue to deliver, but this has been and will be, at the expense of losing vast swathes of designated countryside on greenfield sites, not brownfield sites, and because of the lack of the 5 year HLS have been at the mercy of speculative planning applications such as this. In accordance with the National Planning Policy Framework (NPPF) it is crucial that development is genuinely plan-led, not developer driven; the existing plan and the emerging plan both carry weight, the policies mentioned in this objection have been found by previous inspectors to align with the framework. Moving forward, WBC now have a 5-year HLS (with buffer) and speculative applications such as this, which are harmful to communities and historical villages such as Hurst, do not outweigh the meagre benefits and should not be allowed.

There is no justification to allow this speculative development proposal for a mere 1 or 2 large houses in designated, valued, rural countryside, outside the development limit; They contribute very little to a HLS which ultimately will be delivered and built strategically in accordance with the existing and future development plan.

6. Inaccurate and Misleading Flood and Drainage details:

The Calibro Flood Risk Assessment (FRA) is inaccurate. Stage 1 PiP applications must still define all land necessary to deliver the proposed development in principle. Any drainage infrastructure essential to the acceptability of the proposal would need to be located within the red line area as the PiP cannot rely on the future land use outside the redline boundary. The Applicants Statement Paragraph 60 states that the illustrative swales and attenuation basin are indicated in the FRA - This is not the case; The FRA Appendix B omits details of these.

Not only does FRA Appendix B omit the SuDS detail but also confirms that the ditch, which the surface water drainage strategy is reliant upon, is not within the red line of ownership either. The landowner/developer does not own this ditch and there is no evidence to suggest that they have gained permission from the third party for drainage prior to this application.

Therefore, the lack of drainage strategy within the redline and functional interdependent reliance on third party land makes this application non-viable.

The FRA also incorrectly states that there is no flooding in the immediate area.

Image 1 below shows Hogmoor Lane flooded just round the corner of Hogmoor Lane heading towards Poplar Lane. I lived in Poplar Lane from 1980 to 2003 and this was a common occurrence. As confirmed by the FRA, the water flows from the ditch adjacent to the site from South to North.

The FRA also fails to consider the WBC S19 Flood Investigation Report (published January 2024) whereby it confirms that Hogmoor Lane floods and as a direct result of this flooding Grade II listed White Rose Cottage flooded internally in 2023.

The S19 Flood Investigation Report also confirms that this area of Hurst has a frequency of a **1-in-3 year storm event**, as opposed to the FRA which states there is a 1 in 100 year frequency of a storm event. To add 2 dwellings with garages on this ill-founded statement is a serious omission. The FRA cannot confirm that the dwellings in Hogmoor Lane, Poplar Lane and the wider area will not flood far more often. It is all very well stating the new dwellings won't flood, but it is interesting to note they are taking precautionary measures by raising the floor levels on the proposed dwellings.

In addition, **Image 2 and 2A below** shows a 2007 WBC flooding history map which clearly details how vulnerable Hogmoor Lane and the wider area are prone to flooding. Due to climate change forecast, this is set to worsen, and yet the FRA fails to ensure the provision of adequate drainage; The addition of 2 large detached houses, garages and access road will increase surface water runoff and thus the proposal cannot avoid increasing (and where possible reduce) risks of or from all forms of flooding (including groundwater) to the wider area, which is contrary to CS Policy CP9 and the NPPF.



Image 1: Flooding Hogmoor Lane

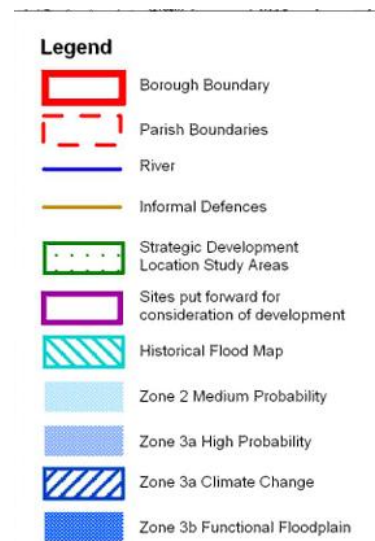


Image 2: Key to Image 2A

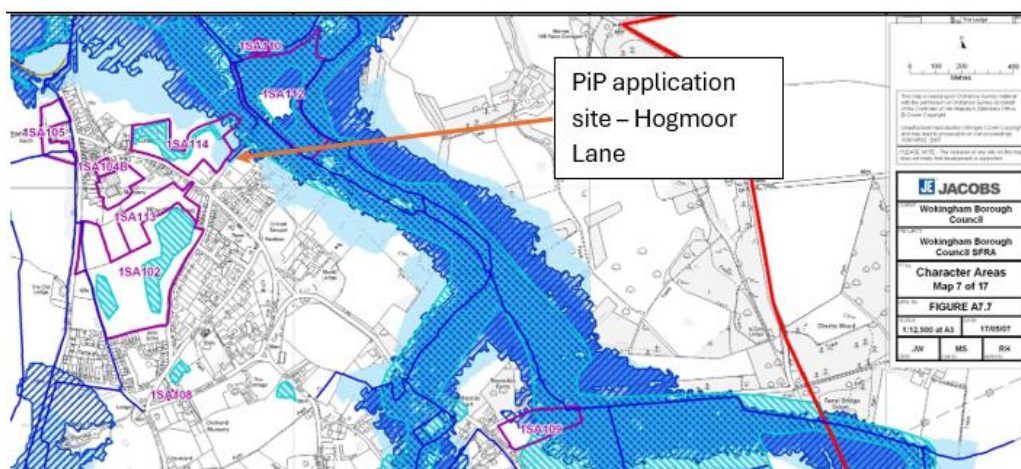


Image 2A – Historic Flood Map clearly demonstrating high probability of flooding previously and in the future in Hogmoor Lane and the wider area.

7. Significant Harm to the Haines Hill Valued Landscape Area (VLA).

WBC carried out a Valued Landscapes Assessment in September 2024³ for the Emerging LPU and this area is included in **the Haines Hill VLA** 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 applicant's protestations during the LPU consultations that Haines Hill VLA designation should not be included, WBC have maintained their stance for very good reasons.

8. Harm to the Historic Landscape

The site is highly visible and adjacent to the non-designated heritage asset (NDHA) Area of Special Character (AoSC). The applicant has tried to diminish the significant harm that the introduction of 1 or 2 large dwellings, garages, access road, visibility splays and the associated paraphernalia and signage on a site that is much higher than the ancient Hogmoor Lane will bring. Any site visit will confirm that the development will significantly dominate and urbanise the historic landscape, rural setting and valued views to and from the AoSC.

Wards Cross House (Grade II Listed) is a Designated Heritage Asset (DHA) and together with Long Barn which is a Non-Designated Heritage Asset (NDHA), form a historic farmstead which Historic England consider to be important historic components and supports the importance of conserving historic buildings and their setting as they make a fundamental contribution to the landscape character, local distinctiveness and a sense of place.

As walkers, riders, cyclists travel along the medieval route of Hogmoor Lane, they experience The Old Posting House (DHA), Wards cross House (DHA), Long Barn (NDHA) Munfin House (NDHA) all in close proximity to the site. They can look across the site, which has stood unchanged since 16th Century, across to the veteran trees, and further Designated Heritage Assets along Broadwater Lane. This will all disappear if this development is permitted.

The PIP application is contrary to NPPF⁴ Paragraphs 203 (f) and (g) as it cannot and does not set out a positive strategy for the conservation and enjoyment of the historic environment, neither does it make a positive contribution to local character and distinctiveness; and

³ [VALUED LANDSCAPES ASSESSMENT](#) WBC 2024

⁴ NPPF S16 Conserving and Enhancing the historic environment [National Planning Policy Framework - 16. Conserving and enhancing the historic environment - Guidance - GOV.UK](#)

does not positively draw on the contribution made by the historic environment to the character of a place.

The PIP application is contrary to NPPF Paragraph 216 as it disregards the significance and the harm of this proposal on the non-designated heritage assets (NDHA).

9. Lack of sustainability

The applicant argues that the introduction of 1 or 2 dwellings is sustainable development. It isn't.

The proposal is contrary to WBC CS Policy CP1 in that it does not demonstrate how it supports opportunities for reducing the need to travel, particularly by the private car in line with CP6.

It is also contrary to WBC Policy CP6 as there isn't a reasonable, realistic, safe choice of an alternative mode of transport available, neither does the proposal improve the existing infrastructure and it certainly doesn't enhance road safety for those walkers, cyclists, horse riders who use Hogmoor Lane.

The lived experience is that Hurst does not have a Post Office, the Bakery is closed, the small shop is only for top up provision at best. There is no GP, no dentist, no chemist, no secondary schools and with the addition of 33 new dwellings already granted permission in the village, it is highly likely that the one or two families in these large dwellings will struggle to register their children for the popular local primary school which only has 20 mixed entry admissions a year. The nearest alternative primary school is not within reasonable walking distance or safe cycling distance. The nearest large supermarket is not within reasonable walking distance (there and back, encumbered with goods) or safe cycling distance either to Twyford, Winnersh or Wokingham. Not everyone wants to use a cricket club, go to the pub or events at the village hall. Most of the routes have no pavements (such as Hogmoor Lane, Tape Lane, Hinton Road, etc) and those that do are narrow and poorly maintained; it is inevitable that in order to pass pedestrians you have to walk on the A321 at certain points, especially when going to the village shop.

Cycling to Twyford is fraught with obstacles as on weekdays between 6 am and 7 pm cars parked along the A321 mean that the cyclists have to be very aware of the speeding and impatient traffic which is dodging in and out of the parked cars – very often these are large tractors, delivery lorries and dust carts.

The bus route is confirmed as being unreliable and classified as a 'poor' service by WBC, as it is one of the longest circular routes in the Borough. It does not run between 7.32 and 9.15 to Twyford or Wokingham. The commuter will not be able to catch a return bus in the evening as they stop about 18.00. It might be a pleasant walk in the summer (although you would still have to cross the busy A321 three times), but in reality, during the autumn, winter and spring months, most people get dropped off and picked up at the station/to school by car. This increases the traffic two-fold twice a day. The bus is infrequent on Saturdays and does not run on a Sunday.

Hurst has very little street lighting, as in line with the Hurst Design Guide, it wishes to protect the dark skies in the parish, this also makes walking and cycling in the winter months unattractive.

The addition of 1 or 2 large dwellings will increase private motor vehicle usage. Like everyone who is resident in the village, we are wholly reliant on the motor car to carry out day to day activities, and the residents of these dwellings would be no different. There is no adequate alternative mode of transport.

Summary

To conclude, this is a ill-conceived, badly presented PiP application. It smacks of hurried desperation, knowing full well that the HLS and LPU are almost there. It is inappropriate and significantly harmful, with little to no benefit that I can establish.

I have lived in this village for over 45 years and in this area for nearly 70 years. My home is within a 5 minute walk of the application site and on a daily basis I pass the site and the views that it brings, the pastoral sheep and cows grazing, the historical landscape, visual amenity and heritage context that many of us enjoy and wish to continue to enjoy. Over the decades, many planning inspectors and WBC have also realised this and have concurred that it is not the right place for development.

For the reasons given above, I request that this application be refused.

Lou Robinson