

Land North of Broadwater Lane and West of Hogmoor Lane, Hurst, Berkshire

Appeal ref. APP/X0360/W/26/6011047.

This document is ancillary to the Appeal Statement for Heritage produced by Ridgeway Heritage Consultancy in July, 2026, in respect of this Appeal. This Statement established that the Appeal scheme would result in harm to the significance of designated and non-designated heritage assets through changes to their settings. The amendments of 2025 to NPPF, and the more recent revision of August, 2026, have provided enhanced provisions for the attribution of harm to heritage assets and provided further clarity regarding the recognition of adverse impacts.

The conclusions of the Appeal Statement have therefore been assessed in the light of the latest policy provisions of the NPPF.

The 2026 Revision of NPPF

HE5: Assessing effects on heritage assets

Point 2 of Policy HE5 states that:

2. Assessments of the potential effects of development proposals on the significance of heritage assets (including through effects on their setting) should identify whether proposals would be likely to:

- a. Have a positive effect, which is where the significance of a heritage asset would be enhanced, or better revealed; or
- b. Have no effect on the significance of a heritage asset; or
- c. Result in harm to the significance of a heritage asset, either from work affecting the asset itself or from development within its setting. The degree of harm should be identified: substantial harm would occur where the development proposal would seriously affect a key element of the asset's significance.

The Appeal Scheme

The Appellant's Appeal Statement for Heritage has misleadingly stated that the Appeal scheme would have no effect on the settings of some designated heritage assets, most particularly that of Wards Cross House. It has not provided detailed assessments of, or attributions of harm for, the levels of setting impact to surrounding listed buildings. This requirement is now strengthened by the criteria of Point 3 in Policy HE 6, below. On consideration of the criteria stated in the 2026

revision of NPPF, it has been determined that the Appeal scheme would result in substantial harm to heritage assets through adverse change to their settings.

The Planning Inspector made the following comments in respect of the 2025 Appeal (3359898):

26. ‘The attributes of the site contribute positively to the setting, and therefore the significance, of the four listed buildings. Historic England guidance on the setting of Heritage Assets advises that settings of heritage assets which closely resemble the setting at the time the asset was constructed are likely to contribute particularly strongly to significance’.

27. ‘That positive contribution would be significantly undermined through increased noise and activity on the Site, as well as the physical presence of nine well-sized houses. This would be the case even if some dwellings were to be set back from Broadwater Lane and even if a scheme of landscaping were to be implemented’.

HE7: Decisions on non-designated heritage assets

1. Development proposals which would have a positive effect on a non-designated heritage asset should be supported.

2. Where a development proposal would harm the significance of a non-designated heritage asset, this should be weighed against the benefits of the proposal and a balanced judgement made, having regard to the scale of any harm or loss and the significance of the non-designated heritage asset. Non-designated heritage assets of archaeological interest that a decision-maker considers to be of equivalent significance to scheduled monuments should be considered subject to the policies for designated heritage assets.

3. Where a development proposal would cause substantial harm to, or the total loss of, the significance of a non-designated heritage asset, it should only be supported where the harm or loss is outweighed by the benefits of the proposal, having regard to the scale of the harm or loss and the significance of the non-designated heritage asset.

The Appeal Site

It has been established that development proposals in this case would result in substantial harm to the significance of non-designated heritage assets, through change to their settings. These heritage assets include the Long Barn, Munfin House and the Hurst Area of Special Character (AoSC).

The Appeal scheme would not result in any positive effects on any of these heritage assets. No balancing judgement in relation to the public benefits of the Appeal scheme has been advanced by the Appellant. When considered in the planning balance, this substantial harm would considerably outweigh the limited public benefits attributed to the Appeal scheme.

HE6: Proposals affecting designated heritage assets

1. When considering the potential effect of a development proposal on the significance of a designated heritage asset, substantial weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential effect amounts to a positive effect, harm, substantial harm, or total loss of its significance.
2. Development proposals which would have a positive effect on a designated heritage asset should be supported.
3. Any harm to a designated heritage asset will be a matter of considerable importance and weight, which should be dealt with in accordance with Paragraphs 4 to 6 of this policy.
4. Where a development proposal would harm the significance of a designated heritage asset the effect on the asset and its significance should be weighed against any public benefits resulting from the proposal.

The Appeal Scheme

In the case of Policy HE6 of NPPF, the Appeal scheme would result in harm to the significance of five Grade II-listed buildings through adverse change to their settings. In the case of Elder Cottage and Buttercups, the level of harm has been assessed as less than that resulting to Bower Cottage and Parkers Cottage, in view of their closer proximity to elements of the Appeal Scheme. In terms of the latest NPPF criteria, the resulting level of harm to Bower Cottage and Parkers Cottage is assessed as substantial. Similarly, there would also be a substantial level of harm to the setting and significance of Wards Cross House, which should include consideration of the group value of this property with adjoining, and historically associated, Long Barn. Such group value, and level of setting impact, is of particular relevance in view of the historical functional and tenorial relationship between these two buildings and their open farmland setting on the western and north-western sides. This aspect of unchanged setting makes a strong contribution to the significance of both buildings. This attribution of substantial harm carries significant weight in the planning balance, particularly when set against the very limited public benefits of the Appeal Scheme.

Contrary to NPPF Policy HE6:

- The Appeal Scheme does not give substantial weight or consideration to the conservation of five surrounding Grade II-listed buildings, through preservation of their settings.
- The Appeal scheme would not result in any positive effect on any of these heritage assets or their settings.
- HE6 emphasises that ‘*any* harm to a designated heritage asset is a matter of considerable importance and weight’, which signifies a higher level of protection than has hitherto been the case. This strengthens the attributions of harm give in our Appeal Statement for Heritage, and heightens the levels of potential impact, and harm, resulting from the Appeal scheme, which in the case of some Grade II-listed buildings would be substantial.
- Given the levels of identified harm to surrounding listed buildings, and the criteria stated in Policy HE6, there is now a stronger obligation on the part of the Appellant to offer justification for such harm, and to provide evidence of public benefits which could be weighed against it. No such justification has been provided in the Appellant’s Appeal Statement for Heritage.
- In the light of Policy HE6, the effects of the Appeal scheme on the settings of designated heritage assets should be given greater weight in the planning balance, in view of the high levels of resulting harm.

Local Landscape Character and its contribution to heritage settings

In addition to the AoSC, attention should be drawn to the landscape character of the wider rural setting of the Appeal Site, which is an important aspect of its historic context and character. The Wokingham Borough Landscape Character Assessment 2019 (WDLCA) shows the Appeal Site sits within the C2 Hurst River Terrace Landscape Character Area. Policy TB21 of the MDD Local Plan states that “Proposals shall retain or enhance the condition, character and features that contribute to the landscape.” While not technically a heritage asset in the accepted sense, the landscape character of the areas to the west and north-west of the Appeal Site comprises an important aspect of heritage settings, and one which would be adversely impacted by the Appeal scheme. This area is characterised by its quality of views and survival of historic fieldscapes, which distinguish it above surrounding areas. When objecting to Application 260353, the report of the Wokingham Borough Council Trees and Landscape Officer stated,

“It is clear from the descriptions in the C2 LCA, from the presence of several Veteran trees, mature and intact high-quality hedgerows in combination with the views across the landscape from

narrow and rural lanes, such as Hogmoor Lane and at Broadwater Lane, and the pastoral backdrop to the ASC, the quality of the landscape features combine to elevate the quality the surrounding landscape of the site above moderate.”

The Appellant’s Appeal Statement provides no assessment of the effect of the Appeal scheme on this local landscape character, or any analysis of resulting harm.

RWM

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