

St Nicholas Hurst Parish Council's comments in respect of Appeal 6011047 Land North of Broadwater Lane and West of Hogmoor Lane, Hurst

Permission in principle application for the proposed erection of a maximum of 7 dwellings (or a minimum of 5 dwellings) including formation of an access from Broadwater Lane

This application (260353) was refused by WBC on 30th March, 2026 at Stage 1 of the application for the above Permission in Principle (PIP).

As a statutory consultee, St Nicholas Hurst Parish Council (SNHPC) objected to this PIP application on 12 March, 2026 and our initial comments continue to stand:

- Negative impact on existing separate settlements;
- Unacceptable drainage strategy together with an ineffective flood strategy in an area renowned for its flooding issues;
- Lack of sustainability;
- Conflict with the existing and emerging, advanced stage Local Plan strategy and policies; and
- Negative impact to both the landscape and visual impact.

However, having read the LPA's officer's report and the appellant's evidence, we would like to add the following comments:

1) Conflict with the PIP Criteria.

SNHPC believe this proposal does not fulfil the criteria for a PIP as the red line for the site should be extended to include all land for necessary infrastructure to deliver the development in principle.

The appellant has excluded the substantial attenuation area which was confirmed in the *Appellants Supplementary Statement on Flood Risk*¹ (S3 Review of Flooding & Drainage Matters) Paragraph 3.1.2 as a necessary part of the development. Therefore there is functional interdependence in order to complete the development. If, the attenuation basin outside the redline is included in the proposal, then the area would exceed the PIP maximum allowable area of 1 ha.

2) Conflict with National and Local Policy.

The application is unplanned development and contrary not only to the existing and emerging Local Plan but also conflicts with National Planning Policy Framework (NPPF).

¹ Supplementary Flood Report Simpson/TWS [Microsoft Word - P23-1019 - Land North West of Hogmoor Lane, Hurst - Supplementary Statement on Flood Risk - Issue 1 - 09.07.25](#)

3) **WBC's Housing Land Supply Trajectory Update (March 2026)**

Currently the deliverable housing land is calculated against the national standard method which calculates local housing need (LHN) for Wokingham Borough to be just over 1,300 homes a year. The Local Plan Update (LPU) is currently being examined, and on its adoption the housing requirement set out in the LPU will be used. **As the plan was prepared under now superseded national planning policy the housing requirement is circa 751 homes a year (Policy SS10 of the LPU).**

Since the PIP application of 9th February, 2026, important evidence has come to light at the ongoing emerging LPU Examination: On 19th May, 2026, WBC submitted their (WBC 27B) *Housing Trajectory Update Table showing the current housing land supply at 31 March, 2026*² (SNHPC Appendix 1). This confirms that the **deliverable housing land supply (HLS)** for period 1 April 2026 to 31 March, 2031 (with a 20% Buffer included) is between **5.5 and 6.2 years**, depending on the calculation.

The accompanying explanation also submitted as evidence on 19th May, 2026 (WBC 27A) *Explanation of Differences between WBC 25 and 27*³ (SNHPC Appendix 2) supports the anticipated timing of housing delivery of the plan period 2023 -2040.

In addition, the above evidence is clearly evidenced in WBC's response statement set out in *Question 2 (Page 5) of Matter 5: Housing Land Supply* (SNHPC Appendix 3)

The above information conflicts with the Appellant's Appeal Statement (Paragraph 1.3) dated June 2026⁴ which used the outdated March 2025 HLS figures.

SNHPC believe the strategic planning for the LPU has been agreed by the Examiners and as the LPU is at such an advanced stage, in this instance, the LPU HLS figures should carry significant weight. Thus, at the date of this appeal, moving forward, there would currently appear to be no housing land supply shortage in Wokingham Borough and no justification to build on a site such as this.

² [Up to date Housing land supply 2026.pdf](#)

³ [017f5b_df276c11daef4f35a53f51f0a2fc797b.pdf](#)

⁴ [Microsoft Word - Appeal Statement of Case June 26.docx](#)

In addition, since the submission of this PIP application, WBC have commenced work (30 June, 2026) on the new-style Local Plan⁵ including the call for sites on 6th July, 2026 to ensure that they comply with any immediate review once the LPU has been adopted.

Even without the above up to date HLS figures, the Inspector's Appeal Decision, Reference APP/X0360/W/25/3359898 (Application 240583) for 9 dwellings and access Land north of Broadwater Lane (**SNHPC Appendix 4**) Paragraph 58 states '*The benefits would not outweigh the harms even on the basis that I was to agree with the appellant that the 5YHLS of the Council is 1.7 years and subsequently recognise the boost to housing supply with that context*'.

4) Conflict with the Appellants response to Previous appeals

The appellant refers to dismissed appeal APP/X0360/W/25/3359898 (Application 240583) for 9 dwellings and access Land north of Broadwater Lane (**SNHPC Appendix 4**) and dismissed appeal (12th January, 1999) HAP/X0360/A/98/298932/P9 for 5 detached dwellings and garages at Hogmoor Lane, Wards Cross, Hurst (refer Appellant Appendix 1).

There is nothing in this PIP application that overcomes the reasons why these appeals were dismissed; There is still substantial harm to the Designated Heritage Assets (DHA) and the Non-Designated Heritage Assets (NDHA), including the Area of Special Character (AoSC).

The Inspector for APP/X0360/W/25/3359898 (**SNHPC Appendix 4**) Paragraphs 25 - 31 and 58, 59 and 61 clearly confirms the harm to the listed buildings. In particular Paragraph 26 states the following:

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 (Footnote 8⁶).

⁵ WBC Local Plan 2045

⁶ Footnote 8 in Appeal decision: Historic England, The Setting of Heritage Assets, Historic Environment Good Practice Advice in Planning Note 3 (Second Edition) p4

The illustrative new layout rearrangement, even if the PIP was reduced to the minimum of 5 dwellings, will still significantly impact negatively on the DHA and NDHA in Broadwater Lane and Hogmoor Lane.

Contrary to the Appellants Executive Summary of the Appeal Statement Paragraphs 1.4, 1.5 and 1.6 a site visit will confirm the following:

- The reduction in floor space is illustrative only and does not provide any guarantee for future development.
- The reduction in development along the Broadwater Lane frontage is at the cost of developing the Hogmoor Lane frontage which has been previously dismissed at 1998 Appeal HAPP/X0360/A/98/298932/P9 (Appellants Appendix 1).
- The illustrative separation distance to listed buildings along Broadwater Lane has not been significantly increased from the previously dismissed appeal. The distance is restricted by the shape of the site and the proposed new access road. Illustrative Plots 1 and 2 (Appellants Appendix 5 - Overlay SK01⁷) remain very much the same distance as those proposed in the previous dismissed appeal for 9 dwellings and by introducing Plot 3 they have decreased the distance to DHA Wards Cross House.
- The illustrative building set back from Broadwater Lane is not significantly set-back (refer to Appellants Appendix 5 - Overlay SK01) due to the restrictions of the boundaries and shape of the site and introduction of the proposed access road.
- The illustrative landscape planting and visual screening is not substantially enhanced and will not mitigate the harm caused by the introduction of the extensive visibility splays and access entrance necessary to Broadwater Lane (A321). The introduction of the visibility splays and access are detrimental to the designated 'Green Route' which cannot be mitigated by the illustrative landscape planting.

5) Harm to Designated Heritage Assets and Non-Designated Heritage Assets

The appellants Appeal Heritage Statement prepared by 'Forum Heritage Services' (FHS) (May 2026) (Page 4) accepts that the field does make a contribution to the setting of heritage buildings.

⁷ Appellants Appendix 5 – Overlay [SK01](#)

SNHPC disagree with statement in FHS' Executive Summary that *'...the harm can reasonably be described as at the lower end of less than substantial'*.

Contrary to FHS supposition (Paragraphs 4.4 and 4.7) that historically they believe there was a substantial hedge along Broadwater Lane to *'block the view into the application site'* is unsubstantiated conjecture and living memory and the 1872 OS map clearly (**Fig. 1**) confirm that no hedge existed along Broadwater Lane. The designated heritage assets and the community have benefitted from this visual amenity and rural setting for at least 150 years and the site is very much part of the important setting of ancient Hurst and Whistley Green.

The Inspectors Letter dated 12th January, 1999 (Appellants Appendix 1⁸) for appeal HAPP/X0360/A/98/298932/P9, Paragraph 5 states:

'5). The hedges which bound those fields include mature trees but are discontinuous, particularly beside the A321 from which clear views of the appeal site can be obtained'.

Fig. 1 OS Map 1872 showing no hedgerow along Broadwater Lane



FHS then go on to state with regard to Heritage Asset 'Wards Cross House' that as it is a PIP *'..there is opportunity to amend the positioning to match that in the dismissed appeal⁹ where no harm is found'*. However, FHS have failed to grasp that with the constraints of the proposed access road traversing the field to those dwellings proposed along Hogmoor Lane, there isn't the opportunity to change the layout which won't

⁸ Appellants Appendix 1 – Decision Letter from PINS regarding Appeal for 5 dwellings and garages in Hogmoor Lane and Wards Cross [ViewDocument](#)

⁹ SNHPC Appendix 4) Previous Appeal Reference APP/X0360/W/25/3359898 for 9 dwellings

further increase the substantial harm to the Designated Heritage Assets¹⁰ (DHA) and the Non-Designated Heritage Assets¹¹ (NDHA) including the Area of Special Character (AoSC).

The Appeal Inspector for (for APP/X0360/W/25/3359898) (**SNHPC Appendix 4**)

Paragraph 59 states:

*59. Given my findings with regard to irreplaceable habitats and **designated heritage assets** the application of Framework policies relating to those matters provide clear reasons for refusing the development proposed. The proposal does not therefore benefit from the presumption in favour of sustainable development [SNHPC bold emphasis].*

Contrary to the Appellants Appeal Statement S4 *Willowmead and the Area of Special Character (AoSC) Reason for Refusal 2 (p.23)*. SNHPC confirm there are significant differences between that of the Willowmead proposal which was for a major development with outline permission and this PIP proposal. In the Willowmead proposal there were no veteran trees involved, it was not on a designated green route or adjacent to a busy 'A' road. The development only affected one Designated Heritage Asset (Vine Cottage), which is set in its own substantial grounds and the NDHA Old School House AoSC. Compared to Willowmead, the PIP proposal significantly harms a cluster of Designated and Non-Designated Assets, including the adjacent AoSC, the designated green route, and the proposed Haines Hill Valued Landscape. The appellant has omitted to state that the reserved matters application (253074 – submitted January 2026) for Willowmead have so far not been permitted due to the developers inability to solve the drainage issues and the design and layout which is in conflict with the street scene and AoSC.

Therefore, the PIP application is contrary to NPPF¹² 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 does not positively draw on the contribution made by the historic environment to the character of a place.

¹⁰ Designated Heritage Assets: Grade II listed Bower cottage, Grade II Parkers Cottage, Grade II Elder Cottage and Grade II Wards Cross House

¹¹ Non-designated Heritage Assets: Munfins, Long Barn curtilage and Area of Special Character

¹² NPPF S16 Conserving and Enhancing the historic environment [National Planning Policy Framework - 16. Conserving and enhancing the historic environment - Guidance - GOV.UK](#)

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). The Appellant's Appeal Statement¹³ S3 Paragraph 3.4 (page 12) Table 2 has not sought the opinion of their own expert (FHS) on the harm to the NDHAs from which SNHPC can only conclude, with the addition of the illustrative proposed development along Hogmoor Lane, that the appellant/FHS do not consider the AoSC, Long Barn (which is a curtilage listed NDHA) and Munfins (NDHA) as being a material consideration, despite Table 2 evidencing that WBC's PIP assessment of harm for the AoSC alone is 'Moderate to High'.

6) Loss of Best and Most Versatile Agricultural land.

The proposed site is on BMV Grade 3 and as the field opposite is predominantly Grade 3A¹⁴ (land between Lodge Road and Tape Lane), with the appellants lack of evidence to support otherwise, it must be presumed that the proposed site is also on Grade 3A.

Although the PIP application is only for 0.96ha, in order for it to be functional, it relies heavily on the interdependency of adjacent additional agricultural farmland, outside the settlement limit, to accommodate the illustrative large attenuation basin to fulfil future SuDS requirement and this must also be presumed to be on BMV Grade 3A. In addition, the land is currently being actively farmed for the production of livestock. Development on BMV 3A conflicts with the NPPF.

7) The PIP proposal is in conflict with the emerging WBC Policy NE6

Under the emerging Policy WBC NE6 (which does carry some weight as it is at advanced examination stage) WBC designated the area, including this site, as being in the Haines Hill Valued Landscape Area¹⁵. Policy NE6 directs development away from sensitive areas unless exceptional circumstances apply. WBC continue to recognise this landscape as having high local value and any development must respect the character and the visual quality of the area including the topography, heritage sites, field patterns and settlement forms, the scenic quality and local attachment, visual impact and sensitivity to change. This PIP application is contrary to all of this.

CONCLUSION

To conclude, the introduction of between 5 and 7 dwellings in an area which is quintessentially an important traditional and historic local area, valued by the community, together with the

¹³ Appellants Statement of Case [Microsoft Word - Appeal Statement of Case June 26.docx](#)

¹⁴ According to Defra Magic Map Agricultural Classifications Post 1998 [Magic Map Application](#)

¹⁵ [Valued Landscapes Topic Paper.pdf](#)

substantial level of harm to the designated Heritage Assets, the non-Designated Heritage Assets and the settlement form, far outweighs the benefits and SNHPC request that this appeal be dismissed.

APPENDICES

1. WBC Housing Land Supply Position at 31 March, 2026 Tables 1 & 2
2. WBC Explanation of Differences between WBC25 and WBC27
3. WBC LPU Statement for Part 2 Hearing Session: Response to Matter 5: HLS (March 2026)
4. Appeal Decision dated 17 October, 2025. Appeal Ref: APP/X0360/W/25/3359898 – Land north of Broadwater Lane, Hurst Easting 479531 Northing 174133 for the erection of 9 dwellings and associated access