



The Planning Inspectorate
Temple Quay House
2 The Square
Bristol
BS1 6PN

17th June 2026

Dear Sirs

Land adjacent to Pound Lane Cottage, Pound Lane, Hurst, RG10 0RS
Appeal by Mr D Phillips
PINS Ref: 6008845

I refer to the appeal at the above-mentioned site and to the Council's Statement of Case.

I set out below my comments on the Council's statement of case.

Paragraph 2.3: As set out within the appellant's statement of case, the buildings to the north are no longer a farmyard but now form part of a business park. It is acknowledged that a number of the former buildings were re-used for commercial purposes but several have also been extended and intensified subsequently.

Paragraph 3.4: Paragraph 1.4 sets out the complete sequence of events which is backed up by the emails appended to the appellants statement of case. The officer does actually use the term 'we believe' in email correspondence indicating it was more than just the author/officer's opinion concerning the invitation to submit the application with amendments.

Paragraph 3.5: The appellant is very surprised by the comment that it is 'relatively common' for recommendations to be overtuned by management. On this occasion, the conditions had been agreed and the appellant was literally awaiting final sign off and issuing of a planning approval.

Paragraphs 3.7-3.8: As set out within the appellant's statement of case, he acknowledges that the use could be operated by somebody other than himself and therefore the stated case is that he would be willing to accept a personal permission (controlled by condition) to operate the business as it is clear that the type of operation is low intensity.



Paragraph 3.9: The Council's statement that '*a building contractor is not reasonably a sustainable rural enterprise*' is not justified as there is no definition in the Core Strategy. The appellant's location is well-related to the surrounding rural/semi-rural area and it is just as sustainable to be located within these locations as it would be within a town where opportunities for secure builder's storage are extremely limited. The Inspector will note that the appellant altered the plans under invitation prior to submission to adhere to the Council's wishes.

Paragraph 3.10: As set out within the statement of case, the appeal site has always been characterised by buildings of a similar scale and form to those being proposed. The surfacing is modest in scale and will use sympathetic permeable loose stone which will reflect the semi-rural context. It should be noted that the adjoining Oakley Farm which is now in commercial use comprises of buildings which have been greatly altered and expanded including new buildings re-erected following fire damage. The farm does not contain historic buildings.

Paragraph 3.12: The Council acknowledge that there were until recently buildings on the site. The appellant would maintain that there would be environmental improvements through substantial new planted areas and re-instatement of the meadow for the goat rearing use.

Paragraph 3.13: The Council acknowledge that the site and area are not typical of the 'Ashridge Farmed Valley Lowland' landscape character area. The appellant maintains that the proposals would not harm the typology and would at the very least 'preserve' the rural character.

Paragraph 3.15: The appellant does not agree with the Council's analysis of this point. Notwithstanding the fact that a personal permission would make the proposal a sustainable enterprise, it cannot be right that each sub-paragraph of paragraph 88 is required to be met as both (a) and (b) refer to different scenarios.

Paragraph 3.16: The proposal is considered to be sensitive to its surroundings and this point is covered already in the main statement of case. The Council have never alleged that there would be an unacceptable impact on local roads presumably due to the accepted low traffic levels generated. In terms of exploiting opportunities to make a location more accessible, the use needs to be judged against the specific circumstances of the case. On this occasion, the use would substantially exploit opportunities for access by foot as the sole user (the appellant) is able to walk to the premises at a distance of 50m. Paragraph 89 is therefore met in full.

Paragraphs 3.17-3.20: As stated above, the appellant can walk to the site along a track and when required can drive his truck the same distance into the site as opposed to driving



several miles if the yard were elsewhere (as set out in the statement of case, the appellant currently stores materials in several locations requiring multiple local journeys). Visitors, as acknowledged by the Council, are very rare and limited to a few visits per week which would be by use of a small trade van irrespective of where the site is located.

Suggested conditions: The suggested conditions reflect those agreed two days before the decision was issued and are therefore considered to be acceptable. As stated above, the appellant is willing to accept a personal condition to him as the sole operator from the site.

Yours sincerely

Neil Davis