

The Planning Inspectorate

PLANNING APPEAL FORM (Online Version)

WARNING: The appeal **and** essential supporting documents **must** reach the Inspectorate within the appeal period. **If your appeal and essential supporting documents are not received in time, we will not accept the appeal.**

Appeal Reference: APP/X0360/W/25/3364304

A. APPELLANT DETAILS

The name of the person(s) making the appeal must appear as an applicant on the planning application form.

Name	Ms Kari Burton
Company/Group Name	Mactaggart and Mickel Strategic Land
Address	12th Floor 5 Merchant Square London W2 1AY
Preferred contact method	Email ☒ Post ☐

B. AGENT DETAILS

Do you have an Agent acting on your behalf?	Yes ☒ No ☐
Name	Miss Charlotte Ryan-Elliott
Company/Group Name	Planning Potential
Address	148 tooley street london bridge SE1 2TU
Phone number	02073578000
Email	charlotte.r@planningpotential.co.uk
Preferred contact method	Email ☒ Post ☐

C. LOCAL PLANNING AUTHORITY (LPA) DETAILS

Name of the Local Planning Authority	Wokingham Borough Council
LPA reference number	242067
Date of the application	12/08/2024

Did the LPA validate and register your application?	Yes	☒	No	☐
Did the LPA issue a decision?	Yes	☒	No	☐
Date of LPA's decision	29/11/2024			

D. APPEAL SITE ADDRESS

Is the address of the affected land the same as the appellant's address?	Yes	☐	No	☒
Does the appeal relate to an existing property?	Yes	☐	No	☒
Address	Land Between Lodge Road And Tape Lane RG10 0EG Hurst Wokingham Grid Ref Easting: 479470 Grid Ref Northing: 173663			
Is the appeal site within a Green Belt?	Yes	☐	No	☒
Are there any health and safety issues at, or near, the site which the Inspector would need to take into account when visiting the site?	Yes	☐	No	☒

E. DESCRIPTION OF THE DEVELOPMENT

Has the description of the development changed from that stated on the application form?	Yes	☐	No	☒
Please enter details of the proposed development. This should normally be taken from the planning application form.				
Outline application for the proposed erection of up to 99 no. dwellings, green infrastructure, open space, pedestrian and cycle links, recreational facilities and other associated infrastructure and access points on Lodge Road and Tape Lane with required improvements. (All matters reserved except for means of access.)				
Area (in hectares) of the whole appeal site [e.g. 1234.56]	10.68 hectare(s)			
Does the proposal include demolition of non-listed buildings within a conservation area?	Yes	☐	No	☒

F. REASON FOR THE APPEAL

The reason for the appeal is that the LPA has:

1. Refused planning permission for the development.	☒
2. Refused permission to vary or remove a condition(s).	☐
3. Refused prior approval of permitted development rights.	☐
4. Granted planning permission for the development subject to conditions to which you object.	☐
5. Refused approval of the matters reserved under an outline planning permission.	☐
6. Granted approval of the matters reserved under an outline planning permission subject to conditions to which you object.	☐
7. Refused to approve any matter required by a condition on a previous planning permission (other than those specified above).	☐

8. Failed to give notice of its decision within the appropriate period (usually 8 weeks) on an application for permission or approval. ☐
9. Failed to give notice of its decision within the appropriate period because of a dispute over provision of local list documentation. ☐

G. CHOICE OF PROCEDURE

There are three different procedures that the appeal could follow. Please select one.

1. Written Representations ☐
2. Hearing ☐
3. Inquiry ☒

You must give detailed reasons below or in a separate document why you think an inquiry is necessary. The reasons are set out in

☒ the box below

We respectfully request that our appeal submission be considered for a two-week inquiry (circa 6-8 days). We are requesting an inquiry as we consider that the evidence required to be presented in support of the appeal, is best dealt with through the provision of evidence, with cross examination. Whilst we hope to reduce the number of matters needing consideration at the appeal before an inquiry, as detailed in the Statement of Case, the matters that will likely remain are complex. We see the main matters as an amalgamation of the location of housing, landscape impact, sustainability and housing need.

Previous proposals on the appeal site were appealed and considered through an Inquiry (details of which are included in the Statement of Case) and we ask that the new proposals, the subject of this appeal, are dealt with in the same manner.

We consider it likely that there are Rule 6 parties involved in the appeal process and once again, consider an Inquiry to be the most suitable format for these matters to be considered.

As per the Statement of Common Ground, we are intending to overcome several of the reasons for refusal through the consideration of further material. Although we intend to only call three main witnesses (planning, landscape, and transport) we are also allowing for the need to call further design, ecology, trees, flooding, and agricultural land witnesses.

(a) How many witnesses do you intend to call?

8

(b) How long do they need to give their evidence?

1 day each

(c) How long do you estimate the inquiry will last?

8 day(s)

H. FULL STATEMENT OF CASE

☒ [see 'Appeal Documents' section](#)

Do you have a separate list of appendices to accompany your full statement of case?

Yes

☒ No

☐

☒ [see 'Appeal Documents' section](#)

(a) Do you intend to submit a planning obligation (a section 106 agreement or a unilateral undertaking) with this appeal? (Please attach draft version if available)

Yes

☒ No

☐

☒ [see 'Appeal Documents' section](#)

(b) Have you made a costs application with this appeal?

Yes

☐ No



I. (part one) SITE OWNERSHIP CERTIFICATES

Which certificate applies?

CERTIFICATE A

I certify that, on the day 21 days before the date of this appeal, nobody, except the appellant, was the owner of any part of the land to which the appeal relates;



CERTIFICATE B

I certify that the appellant (or the agent) has given the requisite notice to everyone else who, on the day 21 days before the date of this appeal, was the owner of any part of the land to which the appeal relates, as listed below:



Owner's Name:

Dr Francesca Elizabeth Crawford

Address at which notice was served:

38 High Street, Grantchester, Cambridge, CB3 9NF

Date the notice was served:

17/04/2025

Owner's Name:

Sharon and Howard Millett

Address at which notice was served:

Trecarnwenn, Mead End Road, Sway, Lymington, Hampshire SO41 6EH

Date the notice was served:

17/04/2024

Owner's Name:

Ian Lucken

Address at which notice was served:

Lands End Farm, Twyford, Reading, Berkshire RG10 0UG

Date the notice was served:

17/04/2024

CERTIFICATE C and D

If you do not know who owns all or part of the appeal site, complete either Certificate C or Certificate D and attach it below.



I. (part two) AGRICULTURAL HOLDINGS

We need to know whether the appeal site forms part of an agricultural holding.

(a) None of the land to which the appeal relates is, or is part of, an agricultural holding.



(b)(i) The appeal site is, or is part of, an agricultural holding, and the appellant is the sole agricultural tenant.



(b)(ii) The appeal site is, or is part of, an agricultural holding and the appellant (or the agent) has given the requisite notice to every person (other than the appellant) who, on the day 21 days before the date of the appeal, was a tenant of an agricultural holding on all or part of the land to which the appeal relates, as listed below.



J. SUPPORTING DOCUMENTS

01. A copy of the original application form sent to the LPA.



02. A copy of the site ownership certificate and agricultural holdings certificate submitted to the LPA at application stage (if these did not form part of the LPA's planning application form).



03. A copy of the LPA's decision notice (if issued). Or, in the event of the failure of the LPA to give a decision, if possible please enclose a copy of the LPA's letter in which they acknowledged the application.



04. A site plan (preferably on a copy of an Ordnance Survey map at not less than 10,000 scale) showing the general location of the proposed development and its boundary. This plan should show two named roads so as to assist identifying the location of the appeal site or premises. The application site should be edged or shaded in red and any other adjoining land owned or controlled by the appellant (if any) edged or shaded blue.



05. (a) Copies of all plans, drawings and documents sent to the LPA as part of the application. The plans and drawings should show all boundaries and coloured markings given on those sent to the LPA.



05. (b) A list of all plans, drawings and documents (stating drawing numbers) submitted with the application to the LPA. ☒
- 05.(c) A list of all plans, drawings and documents upon which the LPA made their decision. ☒
06. (a) Copies of any additional plans, drawings and documents sent to the LPA but which did not form part of the original application. ☒
06. (b) A list of all plans, drawings and documents (stating drawing numbers) which did not form part of the original application. ☒
07. A copy of the design and access statement sent to the LPA (if required). ☒
08. A copy of a draft statement of common ground if you have indicated the appeal should follow the hearing or inquiry procedure. ☒
09. (a) Additional plans, drawings or documents relating to the application but not previously seen by the LPA. Acceptance of these will be at the Inspector's discretion. ☐
09. (b) A list of all plans and drawings (stating drawing numbers) submitted but not previously seen by the LPA. ☐
10. Any relevant correspondence with the LPA. Including any supporting information submitted with your application in accordance with the list of local requirements. ☐
11. If the appeal is against the LPA's refusal or failure to approve the matters reserved under an outline permission, please enclose:
- (a) the relevant outline application; ☐
- (b) all plans sent at outline application stage; ☐
- (c) the original outline planning permission. ☐
12. If the appeal is against the LPA's refusal or failure to decide an application which relates to a condition, we must have a copy of the original permission with the condition attached. ☐
13. A copy of any Environmental Statement plus certificates and notices relating to publicity (if one was sent with the application, or required by the LPA). ☐
14. If the appeal is against the LPA's refusal or failure to decide an application because of a dispute over local list documentation, a copy of the letter sent to the LPA which explained why the document was not necessary and asked the LPA to waive the requirement that it be provided with the application. ☐

K. OTHER APPEALS

Have you sent other appeals for this or nearby sites to us which have not yet been decided?

Yes ☐ No ☒

L. CHECK SIGN AND DATE

(All supporting documents must be received by us within the time limit)

I confirm that all sections have been fully completed and that the details are correct to the best of my knowledge.

I confirm that I will send a copy of this appeal form and supporting documents (including the full statement of case) to the LPA today.

Signature

Miss Charlotte Ryan-Elliott

Date

17/04/2025 17:24:06

Name

Miss Charlotte Ryan-Elliott

On behalf of

Ms Kari Burton

The gathering and subsequent processing of the personal data supplied by you in this form, is in accordance with the terms of our registration under the Data Protection Act 2018.

The Planning Inspectorate takes its data protection responsibilities for the information you provide us with very seriously. To find out more about how we use and manage your personal data, please go to our [privacy notice](#).

M. NOW SEND**Send a copy to the LPA**

Send a copy of the completed appeal form and any supporting documents (including the full statement of case) not previously sent as part of the application to the LPA. If you do not send them a copy of this form and documents, we may not accept your appeal.

To do this by email:

- open and save a copy of your appeal form
- locating your local planning authority's email address:
<https://www.gov.uk/government/publications/sending-a-copy-of-the-appeal-form-to-the-council>
- attaching the saved appeal form including any supporting documents

To send them by post, send them to the address from which the decision notice was sent (or to the address shown on any letters received from the LPA).

When we receive your appeal form, we will write to you letting you know if your appeal is valid, who is dealing with it and what happens next.

You may wish to keep a copy of the completed form for your records.

N. APPEAL DOCUMENTS

We will not be able to validate the appeal until all the necessary supporting documents are received.

Please remember that all supporting documentation needs to be received by us within the appropriate deadline for the case type. Please ensure that any correspondence you send to us is clearly marked with the appeal reference number.

You will not be sent any further reminders.

The documents listed below were uploaded with this form:

Relates to Section:	FULL STATEMENT OF CASE
Document Description:	A copy of the full statement of case.
File name:	7169_Hurst SoC Final_17042024.pdf
Relates to Section:	FULL STATEMENT OF CASE
Document Description:	A separate list of appendices to accompany your full statement of case
File name:	Appendix 4 - Swallowfield Appeal.pdf
File name:	Appendix 3 - Langley Common Road Committee Report.pdf
File name:	Appendix 8 - Letter of Support.pdf
File name:	Appendix 5 - Twyford Appeal Decision.pdf
File name:	Appendix 6 - Site's Recent Appeal Decision.pdf
File name:	Appendix 1 - Decision Notice.pdf
File name:	Appendix 2 - Officer Delegated Report.pdf
File name:	Appendix 7 - Agricultural Land Considerations.pdf
File name:	Statement of Case – List of Appendices.pdf
Relates to Section:	FULL STATEMENT OF CASE
Document Description:	A planning obligation (a section 106 agreement or a unilateral undertaking).
File name:	draft s106 Lodge Road Hurst on appeal 170425(32896896).pdf
Relates to Section:	SUPPORTING DOCUMENTS
Document Description:	01. A copy of the original application sent to the LPA.
File name:	Application Form.pdf
Relates to Section:	SUPPORTING DOCUMENTS
Document Description:	03. A copy of the LPA's decision notice (if issued). Or, in the event of the failure of the LPA to give a decision, if possible please enclose a copy of the LPA's letter in which they acknowledged the application.
File name:	DN.pdf
Relates to Section:	SUPPORTING DOCUMENTS
Document Description:	04. A site plan (preferably on a copy of an Ordnance Survey map at not less than 10,000 scale) showing the general location of the proposed development and its boundary. This plan should show two named roads so as to assist identifying the location of the appeal site or premises. The application site should be edged or shaded in red and any other adjoining land owned or controlled by the appellant (if any) edged or shaded blue.
File name:	1422 004 Site Location Plan.pdf
Relates to Section:	SUPPORTING DOCUMENTS
Document Description:	05.a. Copies of all plans, drawings and documents sent to the LPA as part of the application. The plans and drawings should show all boundaries and coloured markings given on those sent to the LPA.
File name:	P24-2270 R001_LVIA_Final.pdf
File name:	Sustainability and Energy Statement.pdf
File name:	P23-2270_EN_07 Illustrative Landscape Strategy Plan.pdf
File name:	Statement of Community Involvement.pdf

File name:	SLR-HDG-500-01 Drainage Strategy.pdf
File name:	Appendix 2 - Detailed Methodology.pdf
File name:	Appendix 1 - Parameters Plan 1422 002B.pdf
File name:	Figure 4 - Landscape Character Plan P23_2270_EN_04A.pdf
File name:	Figure 1 - Site Location Plan P23_2270_EN_05A.pdf
File name:	ITB19328-005A TA Appendices D-G.pdf
File name:	16452 R02a EcIA MJ 220724.pdf
File name:	Figure 3 - Topography Plan P23_2270_EN_03A.pdf
File name:	ITB19328-005A TA Appendices A-B.pdf
File name:	16452_R01a_Arboricultural Impact Assessment_JP_02072024.pdf
File name:	Figure 6 - Annotated Photoviews P23-2270_EN_06B.pdf
File name:	Figure 5 - Viewpoint Location Plan P23_2270_EN_10.pdf
File name:	Figure 2 - Environmental Designations Plan P23_2270_EN_01A.pdf
File name:	APPEND~3.PDF
File name:	ITB19328-005A TA Text Figures and Drawings.pdf
File name:	ITB19328-005A TA Appendices B-C.pdf
File name:	Appendix 4_Visualisations part 1 of 2.pdf
File name:	7169_Lodge Road Hurst Planning Statement with Appendices.pdf
File name:	ITB19328-006A Framework Travel Plan Full.pdf
File name:	Appendix 4_Visualisations part 2 of 2.pdf
File name:	ITB19328-005A TA Appendices G-M.pdf
File name:	Part 2_Contamination Report.pdf
File name:	Part 1_Contamination Report.pdf
File name:	Part 3_Contamination Report.pdf
File name:	Part 4_Contamination Report.pdf
File name:	Part 1_Hurst_FRADS_P02.pdf
File name:	Part 2_Hurst_FRADS_P02.pdf
Relates to Section:	SUPPORTING DOCUMENTS
Document Description:	05.b. A list of all plans, drawings and documents (stating drawing numbers) submitted with the application to the LPA.
File name:	List of originally submitted docs.pdf
Relates to Section:	SUPPORTING DOCUMENTS
Document Description:	05.(c) A list of all plans, drawings and documents upon which the LPA made their decision.
File name:	List of docs LPA made decision on.pdf
Relates to Section:	SUPPORTING DOCUMENTS
Document Description:	06.a. Copies of any additional plans, drawings and documents sent to the LPA but which did not form part of the original application (e.g. drawings for illustrative purposes).
File name:	HurstInitialLetter.pdf
File name:	16452 R03 Bat Activity Report 10102024.pdf
File name:	16452_~1.PDF
File name:	16452 R02b EcIA MJ 21112024.pdf
File name:	ITB19328-006B - Framework Travel Plan.pdf
File name:	ITB193~3.PDF
File name:	ITB193~2.PDF
File name:	ITB193~1.PDF
File name:	Part 1_26519-HYD-XX-XX-RP-GE-1002-S2-P01.pdf
File name:	Part 2_26519-HYD-XX-XX-RP-GE-1002-S2-P01.pdf
File name:	Agricultural Land Considerations.pdf
Relates to Section:	SUPPORTING DOCUMENTS
Document Description:	06.b. A list of all plans, drawings and documents (stating drawing numbers) which did not form part of the original application.
File name:	List of additional docs.pdf

Relates to Section: SUPPORTING DOCUMENTS
Document Description: 07. A copy of the design and access statement sent to the LPA.
File name: 1422 Land off Lodge Road Hurst DAS V2 Part5.pdf
File name: 1422 Land off Lodge Road Hurst DAS V2 Part2.pdf
File name: 1422 Land off Lodge Road Hurst DAS V2 Part4.pdf
File name: 1422 Land off Lodge Road Hurst DAS V2 Part1.pdf
File name: 1422 Land off Lodge Road Hurst DAS V2 Part3.pdf

Relates to Section: SUPPORTING DOCUMENTS
Document Description: 08. A copy of a draft statement of common ground.
File name: 7169_Hurst SoCG Final_17042025.pdf
File name: Appendix 1 - Decision Notice.pdf
File name: Appendix 2 - Officer Delegated Report.pdf

Completed by MISS CHARLOTTE RYAN-ELLIOTT

Date 17/04/2025 17:24:06