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Development Control
Wokingham Borough Council
Shute End
Wokingham RG40 1BN

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Sent by email to: development.control@wokingham.gov.uk

Dear Sir/ Madam,

OBJECTION to PLANNING APPLICATION NO: 242067 - Land East Of Lodge Road Hurst RG10 0EG

“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.)”

I write to register my **OBJECTION** to this Outline Planning Application irrespective of reserved matters and for the following reasons:

1. Core Policies

By virtue of its location outside of the established Development Limit this site does not comply with Wokingham Borough Council’s Core Strategy Policy CP11, nor does it justify any exceptions identified by the National Planning Policy Framework NPPF (2021).

This site was submitted in response to the ‘call for sites’ for the proposed WBC Local Plan Update (2021) but was deemed to be unsuitable development, inconsistent with the existing settlement location and rural character of the landscape; and giving rise to increased reliance upon car ownership and usage in order to access services and facilities *e.g. transport hubs, retail shops, secondary schools, GPs and sport centres* within neighbouring higher tier sustainable locations in Wokingham, Twyford and beyond.

Furthermore, this Outline Planning Application conflicts with the current WBC Local Plan policies which is valid until 2026, and in accordance with National Planning Policy Framework NPPF (2021) should be refused.

Notwithstanding that, as of 19 September 2024, Wokingham Borough Council’s Emerging Local Plan Regulation 19 Consultation (issued 11 September) will in any event confirm approval that this site has not been allocated, and rightly so as dismissed by the Planning Inspector, Mr David Wildsmith, in his Appeal Decision (paragraphs 137 – 140) dated 9 March 2023 (APP/X0360/W/22/3309202).

Hence, in the absence of any material changes since the initial Planning Appeal in January 2023, I cannot foresee any good reason to approve this speculative outline planning application

founded on 99 houses and a revised set of 'sweeteners' presented as benefits funded for a finite period of time by developer subsidies and significant new resident service charges (and inevitably the subject of year on year % increase). By no stretch of imagination will 50% of these houses be perceived to be Affordable Houses to a single first time buyer also facing the prospect of a 25% increase in Council Tax.

That said, speaking as a long term Hurst resident I can fully appreciate why such younger prospective purchasers have a far greater affinity with vibrant towns such as Wokingham and Reading that have been holistically designed and developed by professional town planners to meet the needs of a modern multi-generation community.

2. Bus Service

The 10 year pro tem benefit of a subsidised 16 seat minibus service funded by new residents through an unprecedented tally of service charges is hardly an accolade for Affordable Homes ownership. Notwithstanding that, it is also divisive in proposing the re-routing of the 128 bus service through the development site to the detriment of existing bus users. Such a token 16 seat minibus service is hardly a credible solution to fulfilling peak hour multi directional travel needs or in minimising car dependency. Such a bus service is nothing less than a house marketing incentive incorporated within the new residents' service charge and certainly does not constitute a community benefit. For most new residents such a bus service service charge will be an unwelcome and an unwanted cost overhead.

With regard to the application of the tilted balance, the introduction of this new bus service and re-routing of the established existing 128 bus service is undoubtedly a significant 'harm' by any measure to existing residents, particularly school children, and indeed to the majority (84.7%) of new residents who will be committed to car travel as acknowledged in the Transport Plan.

3. Transport Plan

Unfortunately narrow local roads and relatively fast moving vehicles and farm traffic are not particularly conducive to safe cycling in other than good weather and daylight conditions. As for the concept of a safe cycling route to school there is no such thing in Hurst. Cycling in and around Hurst is very much a recreational opportunity and certainly does not readily constitute a commuting option other than for the experienced adult cyclist prepared to reach their destined in a bedraggled condition, able to have access to shower and a clean dry change of clothing.

A cycling hub and cycling route map are hardly benefits worthy of consideration.

With regard to 'walk' times outside of the village these are not particularly realistic or practical when factoring in the probability of being able to getting what you wanted in Twyford and being able to carry it home all in a timely matter or go elsewhere. In that regard the car will always be the preferred mode of transport. Likewise, anyone fortunate enough to be able to get a GP or dental appointment may not feel particularly disposed to be able to make a 70 minute round trip on foot and perhaps returning after dark in the rain.

It is all well and good referring to a 7 – 10 minute train journey to Reading but when that it is preceded by a 35 minute walk in the rain along dark roads with a cumbersome bag or two, the gloss on this Transport Plan is somewhat lost. Small wonder people prefer travelling by car to a station car park, park & ride or their end destination.

If the target is to only reduce car usage from a baseline of 84.7% (driver and passenger) to 78.4% after 5 years I would have to question the applicant's self belief in the validity of the Transport Plan in the uptake of the 16 seater minibus service and use of the 128 bus service.

Sorry, but I feel that this Transport Plan is a simplistic spin on modes of travel and journey times as opposed to the overriding challenges of individuals embarking on purposeful time limited trips and safely.

4. Site Access

With reference to the Transport Plan, evidently the Lodge Road access will warrant significant highway works to widen the carriageway to 3 lanes in order to establish a right turn filter when travelling northwards. Such a construction will also warrant considerable loss of the already limited width verges and significant pruning of native hedgerow on both sides of Lodge Road, and the loss of habitat – which presumably is the explanation as to why the location plan 'red line' significantly extends west across the ditch on the west side of Lodge Road.

Suffice to say these road works and ongoing maintenance thereof will result in the loss of about 200 yards of hedgerow, verge width and field ditches. These works will not only also cause irreparable harm through the loss of habitat but in general by adversely impacting upon the rural character of Lodge Road and loss of valued landscape from the east.

Clearly this right turn on a notorious 40mph stretch of Lodge Road will necessitate a 50% increase in road width in order to minimise northbound delays as a result of queuing northbound traffic waiting to turn right across the southbound carriageway.

With 99 households, each in all probability with 2 cars this could result in significant contention with southbound cars accelerating away through Whistley Green southwards.

By virtue of existing traffic speeds, irrespective of motorist compliance to designated speed limits, vehicular access from and onto Lodge Road (*cf* from Sawpit Road) this new road junction will be hazardous particularly when compounded by cyclists and pedestrians (let alone children) utilising south bound roadside edges and narrow overgrown verges particularly after dark during inclement weather and winter months.

Increased use of Lodge Road will undoubtedly increase risks for south bound pedestrians in the absence of a footpath or usable verge.

The notion of cyclists and pedestrians being able to transit across the site to Lodge Road is hardly a noteworthy travel route, be that for commuting or recreational use.

5. Site

The site plan depicts 2 symmetrically mirrored housing estates lacking in character and certainly the charm of a Village community – it merely affords a single point of entry, footpaths, a transport hub and a cycleway to additional access points in Tape Lane - that's it !

This development contributes absolutely no benefit to the existing Hurst community; albeit marketing material will happily sell Hurst as an idyllic location; but as evidenced by previous Planning Applications and Appeal Decisions (and repeatedly asserted by residents) this site is outside of the Village Settlement area and for good reasons that are as applicable today.

The recently issued independently produced report by JBA on behalf of Wokingham Borough Council in March 2024 entitled '*Wokingham Section 19 Flood Investigation*' is very clear that flooding within Wokingham Borough is most prevalent in Hurst and attributed to overflowing field ditches.

This report has at last given credence to the risk of flooding within Hurst being increased from a 1 in 100 year risk to a 1 in 3 year event. The current and gratuitous shot gun approach to planning applications in Hurst will hopefully be finally addressed in the pending approval of the Local Plan Update.

In the context of this development, this site abuts Hatchgate Ditch to the west, Southern Ditch to the south and an unnamed ditch along Tape Lane to the east – none of which were ever intended to be used as other than field ditches, let alone support the outfall from a SuDS drainage system to protect houses constructed on concrete floor slabs raised above ground level in order to mitigate the risk of ground floor property flooding.

Clearly the applicant is all too aware of flood risk within Hurst, but extends no form of mitigation to neighboring properties and roads asserting the need for ditch maintenance by neighbouring landowners.

Collective field ditch maintenance is undoubtedly important, and a matter of necessity on the part of riparian owners, but the consequences of new site discharges via headwalls and outfall pipes being introduced cannot be permitted to the detriment of others.

Surface water discharge from 99 new houses is not insignificant and as an adjoining property owner I don't expect to be impacted or presumed to accept any responsibility for unprecedented discharges.

6. Sustainability

Hurst is a Tier 3 Limited Development Location and as such is designated as an unsustainable location with limited infrastructure and services.

In the absence of viable public transport, schools, road networks or shops and a disproportionate increase of 99 houses, representing a 22% increase in the current settlement housing number and possibly 200 cars / with up to 800 daily local movements plus those of delivery /service vehicles etc this will dramatically exacerbate Hurst's lack of sustainability and dependence on the use of yet more car journeys to higher order settlements for everyday purposes *e.g. onward public transport, schooling, surgeries, shops, restaurants, sport facilities.*

Such increased car dependency and usage will necessitate significant local highway infrastructure enhancements to support increased traffic movements along Lodge Road and other roads for the purpose of commuting, domestic and social journeys to higher tier development locations; ironically affording far more readily available housing options and life-style choices than this housing development.

By implication this development is imposing an increased reliance upon car usage and is contrary to WBC policies CP1, CP3, CP6 and CP11 of the Core Strategy and core planning principles of NPPF sections 5, 9, 12 and 15.

This development is wholly predatory in nature and dependent on other higher tier locations for all manner of everyday services and facilities not available in Hurst; and the unsustainable increase in use of cars in the absence of a viable public transport service.

Conversely this development affords no benefit to the existing community.

Indeed, one of the very reasons why so many young adults move away from Hurst is because they crave the more affordable work lifestyle balance that better located urban towns offer and without the dependence upon having to drive everywhere.

The need for enhanced utility services – water supply, sewerage, gas, electricity and broadband will all be required. The last petrol station in Hurst must have disappeared at least 25 /30 years ago !

With the closure of the P D Jennings (Butcher), the erratic opening and apparent closure of the Hurst Bakery, reduced Post Office opening times local facilities though adequate are very limited.

Without a doubt Hurst is an unsustainable location as confirmed by a Planning Inspector in a recent Appeal decision.

7. Flooding

It is hardly surprising that Thames Water's stated hierarchical preference for disposing of surface water is that of water attenuation, thereby seeking to avoid discharging large volumes of surface water through undersized 20th century sewerage networks and overwhelming sewage treatment works, resulting in increased instances of untreated discharges into the River Thames and giving rise to watercourse flooding, contamination and harm to the natural environment.

Suffice to say that Thames Water have consistently asserted that prospective developers adopt water attenuation solutions (Sustainable Drainage Systems (SuDS) and swales) to manage surface water drainage and not overwhelm their sewerage network and pumping stations. The reality of this is that fields, such as this site, with high water tables are consistently waterlogged and flooded every year alongside field ditches not designed to support hardstand runoff. As an adjacent property owner this is a patently obvious issue.

The risk of flooding in Hurst is far greater than in any other part of Wokingham Borough Council as well documented in an independent report produced report by JBA on behalf of Wokingham Borough Council in March 2024 entitled '*Wokingham Section 19 Flood Investigation*'. It is very clear that flooding within Wokingham Borough is most prevalent and destructive in Hurst.

It is somewhat ironic that the drainage strategies associated with neighbouring planning applications 230074 and 211532 *et seq*, a mere 30 metres apart in School Road and Sawpit Road, appear to have conflicting solutions varying from infiltration, SuDS, network connection and river discharge.

By way of an example of indecisiveness and lack of compliancy to planning approval ... in the case of planning application 211532 (May 21) -> APP/X0360/W/21/3280255 -> 232229 -> 230657 -> 240985 -> 240465 -> 240846 (April 2024) the applicant has to date evidently still not complied with planning Condition 13 to discharge surface water into Hatchgate Ditch via a new headwall and a non-return valve seemingly due to outstanding Environment Agency discharge

approval. The legacy of this recently completed Sawpit Road development is that it is not discharging surface water as planned and approved.

The point here being that Hatchgate Ditch whilst designated by the Environment Agency as a 'main river' has not been consistently maintained and upon comparison with Environment Agency 'main river' mapping it has evidently ceased to exist in reality northwards from the NE corner of Badgers Bottom. From that location, Hatchgate Ditch only exists on Environment Agency mapping such that it is hardly surprising that the Environment Agency has not endorsed new discharges.

Hence, it would appear that this site, the subject of this planning application, is favouring the combined discharge of surface and foul water into Thames Water's network to the north of Tape Lane and through an area in Hurst that is subject to property flooding in Hogmoor Lane and Broadwater Lane – also the current subject of another speculative planning application 240583.

This planning application's (242067) site flood mitigating solution of building houses on raised concrete floor slabs above ground level speaks for itself and in proposing to discharge attenuation ponds into the combined Thames Water sewerage network in Tape Lane it is more than likely to exacerbate existing network flooding issues in Hogmoor Lane and Broadwater Lane; and cause surface water flooding around the perimeter of the planning application site.

With so many uncoordinated developer driven planning applications as this, it is hardly surprising that Hurst has been singled out in the recent the *'Wokingham Section 19 Flood Investigation (March 2024)'* for its flooding prominence across the Borough.

8. Climate Change

Surface water levels in Hurst are progressively rising.

By way of a nearby example, the ditch adjacent to the aforementioned Summerlease toxic waste site currently undergoing remediation in Lodge Road is but testimony to the year on year rising level of water in Hurst's ditches whereby relatively young trees are now standing in water and have become an integral feature of these static / non-contiguous ditches / mangrove-like swamps of fallen and decaying trees.

It is noted that water discharged into MH2801 in Lodge Road from the Summerlease waste site that is currently undergoing remediation is within about 10 metres of the development site, hence not a great location for the discharging of attenuation ponds on a housing estate. In 2014 the Elephant & Castle a few hundred yards from the NW corner of the site was subjected to sewage flooding such that there is no reason in the absence of any remedial work that this area may not be subject to further flooding if further networks connections are established.

9. Character and Landscape

With established hedgerows and the abundance of mature trees and ditches this field very much epitomises the rural character of Hurst. To cut much of it back along Lodge Road will destroy the rural aspect of Lodge Road (B3030) and the field (site location) as viewed from houses notably in Martineau Lane and Tape Lane; and in turn will decimate habitat.

Maintaining the rural character and habitat of Hurst is imperative.

Hence, as DEFRA Grade 3a and 3b agricultural land there is no good reason why this site should not continue to be used as such or indeed continue to be used by a very long standing local family equestrian business (Lands End Stables) for the grazing of horses, ponies and donkeys.

Summary

In the absence of any material changes since the initial Planning Appeal in January 2023, I cannot foresee any good reason to approve this speculative outline planning application founded on 99 houses and a revised set of 'sweeteners' presented as benefits subsidised only funded for a finite period of time but subject to significant service charges (and inevitably year on year % increase). By no stretch of imagination will these 50% of these houses be perceived to be Affordable Houses to a single first time buyer facing the prospect of a 25% increase in Council Tax.

Speaking as a long term Hurst resident I can fully appreciate why such younger prospective purchasers have a far greater affinity with vibrant towns such as Wokingham and Reading. The proposed provision of lockers for deliveries, bike hub, car share club, cycle parking at Twyford Station, non-contiguous lengths of footpaths are simply fanciful inducements dependent upon third party provision and service charges.

This Outline Planning Application is simply another opportunistic development that along with a spate of others are simply jockeying to fulfill a business opportunity to realise capital from the sale of agricultural grade land and has no bearing on fulfilling wider community needs; founded not just on Wokingham Borough Council housing targets but more importantly the realities of existing local infrastructure, services and facilities. The adoption of Strategic Development Locations has to be the way forward.

That said, locations such as Hurst have evolved and gained popularity not because of urbanisation opportunities, as provided in countless other locations, but simply because they fulfill an existing requirement and expectations of a village community lifestyle. Irrespective of external perceptions and aspirations, villages such as Hurst exist for a good reason; as do towns.

I therefore urge you to take onboard these comments and REJECT this unsustainable planning application.

Jonathan Norris