

Date: 21 August 2024
Application: 242067



WOKINGHAM
BOROUGH COUNCIL

MEMORANDUM

From:	Brigitte Crafer Landscape Architect		
Service	WBC Landscape and Trees	App No:	242067
Address:	Land Between Lodge Road And Tape Lane, Hurst, RG10 0EG.		
Proposal:	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.)		
Type of Development:	Major Dwellings (10+)		
Site Visit Made:	Yes/No		

Summary Of Recommendations

- ☐ No comment
- ☐ No objection
- ☐ No objection subject to conditions (and reasons) **stated below**
- ☐ Request further information before determination as **stated below**
- ☒ Objection due to the reason(s) **stated below**

Comments On Proposal

The development proposed, on this site (as in the case of the previous development in 2022) is speculative. The site not been identified in the Local Plan for development. The site is outside of development limits and in the countryside. Although the site is not within a Valued Landscape (see Valued Landscape Topic Paper WBC - 2020) , it lies adjacent to the River Loddon Valued Landscape to the west, and forms the backdrop to Hurst Village centre which is an 'Area of Special Character'. As such, I have an in principle objection to development on this site.

SITE LOCATION

The site is located in the countryside adjacent to villages of Hurst and Whistley Green, between Lodge Road a rural country lane to the west, and Tape Lane to the east also a rural lane but with housing to the east side that overlooks the site. Directly

north of the site are other paddocks and a recent development of housing at the old Valley Nurseries site, and north of that Whistley Green. The southern site boundary backs onto allotments and rear gardens of Martineau Lane.

Lodge Road is a straight country road and there is no footpath on the east side from Nursey Close entrance to The Paddocks to the north. On the west side of Lodge Road there is an entrance to STNH34 where the route goes through hedging to meet with the exit opposite Sawpit Road. Cars travel quite fast along Lodge Road.

The village known as Hurst is located to the north-east of the site along Broadwater Lane, and between Tape Lane and Wokingham Road to the east, and in the south along Sawpit Road. Hurst's 'Area of Special Character' extends from Broadwater Lane in the north along Wokingham Road until it meets Orchard Road in the south-east. There are 2 more 'Areas of Special Character' in Hurst – all closely linked; The Old School House on Sawpit Road, and an area around Wokingham Road. The importance of the open character of the site and the mature trees as a setting for the Area of 'Special Character' cannot be underestimated. Significant change or removal of these landscape elements would constitute a diminishing of that setting and the integrity and importance of the designation.

The fields that make up the site and adjacent paddocks are characterised by mature trees and hedgerows to the field boundaries and larger areas of tree planting to the west and north which are included in an area TPO Ref. 1781/2021. There are 2 individual Oak trees within the site adjacent to Tape Lane protected by TPO 525/1990. Opposite the site boundary on the west side of Lodge Road is TPO 1869/2022 a woodland TPO. Within and to the site boundaries are several Veteran trees (see Arboricultural Information below).

LANDSCAPE CHARACTER

The site is located within 'Wokingham Borough Landscape Character Assessment' (WBLCA) Area C2 – 'Hurst River Terrace', a landscape of moderate condition and sensitivity, and moderate capacity for change. The western site boundary is adjacent to WBLCA Area B1 'Loddon River Valley with Open Water', also a landscape of moderate condition and sensitivity with a moderate capacity for change.

Despite the site not being within the Valued Landscape Assessment, each character area within the WBLCA has 'Valuable Landscape Attributes' which for LCA C2 in relation to the site are;

Peaceful and open character of the undeveloped arable and pastoral landscape when removed from the intrusion of major roads to the south, which provides an escape in close proximity to the urban population.

Rural settlement pattern of small villages with historic cores and farmsteads unified by the cohesive use of redbrick which provides a cultural record of the past and adds local distinctiveness.

A network of narrow rural lanes with characteristic roadside ditches which contribute to scenic quality.

Small wetland habitats, including drainage channels and numerous farm ponds which are valued for flora and fauna.

Gently undulating terrace landform provides open and clear views to the wooded

backdrop of the adjacent Loddon Valley.

LCA C2 Hurst River Terrace

The C2 landscape is described as a simple agricultural landscape of arable and pasture, and a network of water features such as ponds, ditches around fields. The countryside is open in character with few boundaries marked by vegetation, hedgerow and trees to roadsides are scarce, but there are wooded horizons from adjoining Loddon Valley character area (adjacent to Lodge Road). Villages are located around historic cores of Whistley Green and Hurst designation 'Areas of Special Character'. There is no strong vernacular although the character of the older buildings is unified by red brick. New linear development has been along roads and lanes. This is a rural and tranquil area overall.

Key Issues include; hedgerow loss from field expansion, demand for residential development increasing linear development along roads pushing towards the amalgamation of close settlements such as Whistley Green and Hurst impacting the rural character and leading to suburbanisation from building design and dwelling density resulting in increasing traffic on rural lanes and their upgrading including signage, widening that threatens the rural character of the lanes.

The Landscape Strategy is to **conserve** and **enhance** the quiet rural and agricultural landscape of scattered farmsteads and red brick villages connected by rural lanes. There are opportunities for the restoration of hedgerows and to reinstate woodland planting. Regarding development, the aim is to conserve the low density pattern of settlement centred around Hurst and Whistley Green.

The Landscape Guidelines are to conserve the peaceful and open rural character of the open landscape between the adjacent village centres and to protect the individual identity of settlements, to retain their physical and visual separation. In particular protect the sensitive areas of open land remaining between Hurst and Whistley Green, conserve the scenic value and rural character of the villages and the historic buildings and Area of Special Character. Maintain and enhance the character of the rural lanes resisting unsympathetic highways modifications. Protect the strong perceptions of tranquillity in the landscape.

The existing character of the site is of open fields with trees and hedgerows to the field boundaries – they are typical of the C2

LCA – B1 – Loddon River Valley

The B1 character area is a peaceful floodplain landscape that follows a linear course connecting river valley landscapes of A2 and A1. The eastern boundary is defined by the settlement edge of Twyford and the distinct landscape of C2 (Hurst River Terrace) which follows the route of Lodge Road to Davis Street. The 'Valuable Landscape Attributes' of B1 include; lowland landscape with a network of rivers, drainage ditches and restored lakes that provide a strong sense of place. A wooded context of natural and restored woodland areas, fringing carr / pollarded willow vegetation around flooded gravel pits screen development and provide a strong sense of place. There are remnant pockets of traditional pasture edged with pollarded willows along banks and drainage ditches.

Key issues include; changes in structure and species of woodland, and changes in agricultural practice which is leading to loss of traditional pasture and associated features such as hedgerows and hedgerow trees. Demand for new residential development and supporting infrastructure is continuing to push development onto the floodplain, such as at Woodley, impacting landscape character. The Landscape Strategy is to **conserve** and **enhance** the restored wetland character of the floodplain, employing management improvements to increase its robustness. In terms of development, the aim is to avoid the spread of development onto the floodplain and avoid the amalgamation of adjacent settlements.

The landscape guidelines are to conserve and enhance the intrinsic character and beauty of the river landscape and consider the impacts of development in highly visible areas. Conserve, enhance and manage grassland and pasture habitats, conserve and enhance scenic value and rural character.

Both character areas value remaining open pasture, hedgerows and hedgerow trees. The open flat rural landscapes of C2 and B1 seamlessly connect at Lodge Road however, this quality has the potential for development to be highly visible, despite the highly valued partial wooded backdrop along Lodge Road.

PROWS and Recreational Routes

There are very few around the site, with STNH34 (Loddon Long Distance Path) opposition Sawpit Road entrance being the closest, and STNH9 to the NW at 500m away.

ARBORICULTURAL INFORMATION

A Preliminary Arboricultural Impact Assessment Ref. TG Report No. 16452_R01a_JP – July '24. The existing trees are mostly within the site boundaries. The preliminary constraints include several Veteran trees and other high value arboricultural features.

No individual trees will be removed, but 73m of the H1 hedgerow will be removed to facilitate the entrance from Lodge Road, and 15m of G38 a group of trees will be removed to facilitate the emergency access from Tape Lane. No further loss of vegetation is expected *at this stage*.

The proposals have been designed to retain and protect all the trees from development whilst providing adequate protection to Veteran trees by way of a 'Buffer Zone' as per Government Standing Advice and NPPF 186c. The report states there will be a requirement for additional arboricultural impacts during detailed design stage where a definitive assessment of the impacts based on the technical design together with protection measures for retained trees during the construction stage.

A 'Parameter Plan' shows spaces allocated for 99 No. homes (a reduction in 101 dwellings on the previous application for the site), and includes landscaping and areas of Green Infrastructure which will provide a net gain in tree cover from the new planting.

The Tree Survey to BS5837:2012 includes 62 trees, 17 groups, 5 hedgerows and 1 No. woodland described. The vegetation is of predominantly Oak trees many of which are aligning the site boundaries and are classified as being 'A' -1,2,& 3 (see BS5837:2012 classification – A1= high arboricultural value, A2=high landscape value and A3=high cultural value e.g. Veteran trees). The tree cover along the northern boundary in particular is typical of the pastoral context, but the SW and SE boundaries includes 2 Veteran hedgerow trees protected by TPO 0525/1990 with at least one with a local legend attached.

The Arboricultural Report considers 6No. of the surveyed trees to be of Veteran criteria including; T14, T32, T33, T44, T47, T52. T70 has Veteran features but the diameter falls below the threshold for a Veteran tree however, the AC (Arboricultural Consultant) has adopted a precautionary approach and the Veteran tree buffer has been applied (not in Tree Survey Schedule) due to the irreplaceable habitats referred to in the NPPF 186c. There are 2 other large Oak trees T71 and T72 that are the size of a Veteran tree at but lack primary and secondary features to meet the Veteran criteria but are classified as A1,2,3 in the Tree Survey Schedule, however they have not been given the adequate buffer zone on the Tree Constraints Plan. I advise that a precautionary approach is required in relation to these 2 trees as well, and the Tree Plans updated with the correct buffer zone accordingly. It is possible that the route of the cycle path through the orchard will need to be adjusted but this is no big deal.

The high quality of the on-site vegetation is shown in Table 1 below;

	Category U	Category A	Category B	Category C
Individual Trees	T6, T19, T22, T85	T8, T10, T11, T13, T14, T15, T21, T32, T33, T44, T47, T52, T54, T63, T65, T70, T71, T72, T74, T76, T77, T80	T3, T7, T9, T26, T28, T30, T40, T41, T42, T43, T45, T46, T48, T49, T51, T53, T55, T59, T64, T68, T69, T78, T83	T4, T5, T12, T18, T23, T25, T36, T60, T61, T62, T67, T79, T84
Groups of Trees	G35, G37	G56	G16, G20, G24, G27, G50, G57, G58, G66, G73, G82	G29, G38, G39, G75
Hedgerows	None	None	None	H1, H2, H17, H31, H34,
Woodlands	None	W81	None	None

Woodland W81 is located along the west side of Lodge Road and is included in the Tree Constraints Plan – Ref. 16452_Sheet 1 of 2 dated 24.1.24. A new footway is proposed on the northern side of the access along Lodge Road. The footpath will be located on the verge on the eastern side of Lodge Road and requires incursion within the RPA of trees T80, G82, T83 and T84. For clarification, does this mean the footpath will be outside of the site boundary hedgerow? A 'No Dig' construction is proposed to create the path;

3.12...the footpath will be constructed using a no-dig methodology to avoid impact towards tree roots associated with excavation. The footpath has also been designed so that the kerb edges are located around the tree stems and a minimum of 500mm is provided between the kerb edge of the tree stem...

to be detailed in a future Arboricultural Method Statement (AMS).

The access road corridor from Lodge Road goes between, 2 Veteran trees; T14 and T70 which follows the line of the Veteran tree buffer zone through a gap of 17m. Despite the allowance of the Veteran tree buffer zone, the engineering to construct the road between this gap, including kerbs, excavation for the road of at least a minimum of 300mm depth, will affect the balance of the wider rooting area of the trees that have been growing in open land unimpeded by constraints – which is why they have become so large. The change to their wider environment will likely have an impact on them over a period of time.

An extension to the allotments to the south is proposed – all the trees in this area will be retained.

Opportunities exist for new boundary planting in gaps along sections of Tape Lane. Although gaps in the site boundaries appear to be typical of the pastoral context – and allow views across the open pasture fields ablaze with yellow, white depending on the time of year. Native shrub planting does exist growing wild e.g. unmanaged typical of the rural character of field boundaries and sites left ‘in hope value’. Filling in the boundary gaps with new planting will change the character and the new planting will be managed. It would be important to consider hedge laying as a management technique (that is present in the village) that will help to maintain a rural character.

An initial strategy for new tree planting across the site include retained and enhanced vegetation across the boundaries, a new community orchard, parkland planting – tree planting on the edges of the development parcels which frame an area of open common tree planting along the main access road but only to one side of the road. The parameter shown for new Green Infrastructure suggest that a net-gain in tree cover can be achieved by way of a green infrastructure/arboricultural strategy in the Veteran tree buffer zones, the common and the orchard, especially around the new access entrance.

NPPF Paragraph 186c states;

c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons⁶⁷ and a suitable compensation strategy exists;

Policy CC03d requires the retention and protection of trees through development. Whilst I agree that the Veteran tree buffer has been applied – due to the proximity of the trees to other Veterans, and size of tree nos; 71 and 72 have been categorised as A2, A1,2,3 and should be acknowledged as Notable/ future Veterans and the Government Standing advice applied.

LVIA – Landscape and Visual Impact Assessment – Land east of Lodge Road 19.7.24 – Ref. P24-2270

There is no assessment summary in the report for the Landscape Effects of the development on the landscape, but there is a summary of the Visual Effects.

The document makes clear that residential views have been assessed from the settlement edge where public access is available however and there is no individual assessment of the potential impact of views from private dwellings. The assessment

was carried out in May '24 and due to timing it was not possible to include winter views. Selection of views was not previously discussed with the LPA. Due to the enclosed nature of the site it was felt that publicly accessible viewpoints would be limited to close locations to the site or adjacent to the site boundary. The assessment is based on the Parameters Plan – Drawing No. 1422 002 C.

The site is a single large field outside of the village in the countryside. It is 10.68 ha. It is a grazing field for horses and donkeys. To the north is another U-shaped field that is also a 'submitted site' for potential residential development.

To the north-east there are several Grade 2 dwellings on the south side of Broadwater Lane which are included in the Area of Special Character(ASC) that wraps around both sides of Broadwater Lane. The site provides a backdrop to the ASC. Martineau Close to the south is a relatively recent residential development set around the edge of an open green with a play area. NB. It is useful to look at this site in comparison to the scale of the development proposed in this large rural field on the edge of a small village.

Other key elements on the site are the existing trees and hedges and other vegetation. The Tree Survey reveals at least 6No. Veteran trees but most likely 8. These are high quality visual and biodiverse elements that contribute to the value of the landscape character. There has been no development on the site since the first OS Map – 1873, and some of the trees that are on site today are probably included on this map – which also gives the site its 'time-depth' quality. Located broadly between 2 country lanes, and despite some housing to some to its periphery, the site has a tranquillity and sense of place that contributes to the overall setting and character of Hurst and Whistley Green.

There is no public access across the site, but the 'Long Distance Loddon Path' is located on the west side of Lodge Road, its route leading behind the trees and bushes. There is a PROW STNH9 about 370m to the north east. Tape Lane is a single track road that links to the school and the southern part of the village and is a safe pedestrian route, particularly for children attending the local school. The site is relatively flat at 38AOD rising to 42AOD in the east.

The description of the scheme that has been 'landscape led' is included before the findings of the assessment, and it is confusing as to how the assessment led the development of the scheme submitted.

Landscape Impact

The LVIA assesses elements of the landscape character of the site and its immediate setting such as; land cover, topography, trees and hedgerows and Public Rights of Way (no effects). The assessment of the effects on the landscape character of the site in the LVIA are included below;

1. The *land* is given a **medium** value, **medium** susceptibility to change and **medium** sensitivity - resulting in a **medium** magnitude of change and a **moderate/adverse** effect.
2. The *topography* is flat with about a 2m variation across the site. The susceptibility of topography to this type of development is **medium**, with

medium sensitivity and value, results in a **low** magnitude of change and **minor/adverse** landscape effect.

3. *Trees*– most of the trees are protected and there are several **high value** Veteran trees on the site. The susceptibility to the changes proposed is **high**, with overall sensitivity being **high** and a **low magnitude of change**. Magnitude of change on the tree resource is **low** leading to a **moderate/beneficial** effect on the tree resource.
4. The *hedges* are assessed as **medium** value, susceptibility and sensitivity. As the development retains all of the trees and hedges (except for 2 small sections of hedge) it is thought that the magnitude of change is **negligible** with a **negligible adverse** effect on hedges (should be moderate using Table 11?) but then says the magnitude of change on the hedges is **low** and this is a **minor/beneficial** effect

Descriptors of Landscape Effect – Effect of Development

Moderate/ Adverse (Land) effect on the land is described as conflicting with character and value of the landscape and will have an adverse effect on the characteristic features and elements and diminish a sense of place. – I agree

Minor/Adverse effect on topography does not quite fit the character of the landscape, has an adverse effect on characteristic features and detracts from the sense of place. The vertical elements of the development make it more noticeable in the view.

Whilst a **Moderate/Beneficial** effect on trees may enhance the character and value of the landscape – My view is the setting will hardly be enhanced with the density of the housing proposed, and development will remove and not restore the existing sense of place.

Minor/ beneficial (in respect of the hedges) effect complements the character of the landscape and maintains and enhances the characteristic features or elements and enables some sense of place to be restored. – I agree

At previous appeals on the site in 2018, 2019, 2023, it has been established that the site is of moderate quality and condition, although within the Inspector reports the significance of the land of the site strategically can be seen to enhance the value of the site – see variously discussed below. I have assessed the 4 elements; trees, land, topography, hedges in relation to the methodology enclosed and my assessment is slightly higher on 2 of the elements trees and land;

My Opinion

The land due to the presence of veteran trees not easily replaced, the assessment for **landscape value** is **Medium/High**, and **susceptibility** and **sensitivity** should be **Medium/High**, and the magnitude of Change **Medium/High** with **Medium/High Landscape Effects**.

My opinion is the site includes a significant number of Veteran Oak trees, which are rare landscape features, have **high value** in terms of landscape elements, **high susceptibility** and **high sensitivity** and **medium character** resulting in a

Medium/High Magnitude of Change and Medium/High Landscape effects. (See Table 2 LVIA Methodology) .

I agree with the assessment of development of topography and hedges. There is no landscape effect on the 2 nearby PROWs, although obviously clearer views from the Loddon Long Distance Path in winter.

Its important to note the site has an important role in enhancing the setting of the 'Hurst Village Area of Special Character'. The site is also variously high quality agricultural land, has not previously been developed, it is countryside and acts as a buffer to the further expansion of Hurst which in the case of this application the number dwellings would be disproportionate in terms of the number of existing. Hurst lacks key services such as a medical centre with the closest one in Twyford to the north, the opening times of which do not correlate with the bus times – making car travel a necessity which will undermine the tranquillity of the area and have a significant increase of traffic on Lodge Road where the only site entrance is proposed.

Visual Impact

The LVIA states that the due to a combination of landform, surrounding built development and mature vegetation the site is visually contained and there are limited opportunities for public views.

The 11 viewpoints have been categorised into 'Settlements and Places of Interest'. PROWs/Long Distance path and POS, Highways. Most of the views are classified as Medium, - however where there are Veteran trees I believe the views are of medium/high value and the trees are in many of the views looking across the site, as well as walking south along Tape Lane. In most views there will be clear views of the development, which is a distinctive change in the view particularly VPs1A, 1B,2, 3A, 3B, 5, 6, 7, 8, . Partial views of the site from Vps 4, 10, 11. There will be no view from VP9.

The development, despite the POS included, will be clear in the views from around the site with just one viewpoint that has no view. The character of the views will change from little or no activity on the site, to lots of activity, built vertical elements with little space between, a change in the character of landscaping, a destination rather than and a backdrop of landscape of open field which trees and animals – a pastoral view that has remained unchanged for many years. Most of the views are classified as '**Medium**' value, but the clear views of the site will have **Medium/High** susceptibility and sensitivity and a high magnitude of change resulting in a **Major/Adverse** visual effect at year 1 to **Medium to Low/Adverse** at Yr. 15.

SUMMARY

The key issue is whether the proposals conserve and enhance the quiet, rural and agricultural landscape with its scattered farmsteads and small red brick villages connected by narrow rural lanes?

At a previous appeal ref. APP/X0360/W/18/3194044 in 2018, on a smaller paddock to the west of the site; the Inspector discusses the importance of the site and other paddocks to the north, and the role of Lodge Road in connecting the villages of

Hurst, Whistley Green and Wards Cross with their 'reversed C' (plan view form). The countryside within the 'C' (large proportion of which is the site) has a disproportionately high significance in ensuring the enclave retains its character as part of undeveloped countryside rather than becoming perceived as an undeveloped field enclosed within an urban area.

My colleague Mr. Hannington said at the most recent appeal on the site Ref. APP/X0360/W/22/330920 that the development proposals;

.....' would harm the landscape character and appearance of the area and undermine a number of valuable landscape character attributes of the C2 Hurst River Terrace LCA. the proposals would not reflect the rural settlement pattern of small villages with historic cores and farmsteads but rather, by introducing some 200 new houses, would be a huge bolt-on extension increasing the size of this settlement by some 45%, thereby undermining and urbanising the peaceful and open character of the landscape. The proposed development would also undermine the overall landscape strategy for the C2 LCA which is to "conserve the low-density pattern of settlement centred around Hurst and Whistley Green"

Regarding the current application, it is my opinion that despite the reduced number of dwellings proposed for the site being halved, development will not diminish the harm by half, as development, of the type proposed would also fail to conserve and enhance, and will not retain or enhance the condition, character and features that contribute to the landscape and is therefore contrary to Policy TB21

The proposals would inevitably introduce with it; screening planting that would prevent the characteristic views across the landscape. The proposed planting would be alien in such an open landscape and would be maintained and controlled in a way that is typical of suburbanisation.

The effect of the proposed access from Lodge Road – a country road, the need for visibility splays, road markings widened carriageway, new footways and associated signage, lighting would be intrusive resulting in an urbanising effect on Lodge Road, an inherently country road.

Dense built form in parts of the site that are smaller 'bolt ons' do not reflect or logically extend the existing street pattern either to the south or the east. Internal and access roads, lighting, lots of hard surfacing and engineering would be incongruous in a landscape where the key landscape features are perceived in clear views across the landscape.

Crucially, the setting to the ASC would be severely diminished and this view is also reflected by the Inspector at the 2023 appeal who remarked;

.. 'that rather than the land being considered as above the value of ordinary countryside, that its value rises more from its current condition as undeveloped land and the setting it provides for this western side of the settlement..'

The Inspector also stated;

As such, I consider it self-evident that the appeal proposal would have an adverse impact on the rural character and appearance of the appeal site, and would inevitably have an adverse impact on the visual experience of users of Tape Lane and Lodge Road by bringing a more developed feel to the whole area. I share the view of my colleague Inspector who determined an earlier appeal at Lodge Road²¹, that the harm caused in landscape character and visual terms should be categorised as being at the upper end of the moderate scale'.

I agree with the assessment of the upper end of moderate landscape character that I have also assessed within my own interpretation using the LVIA Methodology submitted with the application. The proposals are contrary to Policy CP3 of the CS, as they are not of an appropriate scale, do not create a sense of place. As stated above they conflict with Policy TB21 of the Local Plan.

As it stands the proposals are contrary to NPPF 2023 paragraph 180b) as they fail *to recognise the intrinsic character and beauty of the countryside, and the wider benefits of natural capital and eco system services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;*

Conditions & Reasons (if required)			
Date:	7.10.24	Signed:	B. Crafer