

Rosebank
Tape Lane, Hurst
RG10 0DP

To: Development.control@wokingham.gov.uk

9th February, 2026

For the attention of the designated Planning Officer.

**Re: Planning Application 252934 – Land at Lodge Road, Hurst, RG10 0SG
FULL application for the proposed erection of 3 detached dwellings with associated access,
parking and landscaping and creation of a balancing pond.**

I am writing to **OBJECT** to this application for the following reasons:

1. SPECULATIVE AND INAPPROPRIATE DEVELOPMENT ON A GREENFIELD SITE

This is a speculative application as a last ditch attempt to gain planning permission for an inappropriate site just before the WBC emerging Local Plan is adopted. This site has been refused and dismissed at appeal on numerous other occasions for applications ranging from 1 to 12 dwellings. The applicant is wishing to build on a site that has significant flooding issues in an area designated as countryside, which, by their own admission, would fail the sequential flood risk test if they submitted one and therefore it is highly likely that the tilted balance would automatically be disengaged by any appeal inspector, especially as this was applied to the recent appeal for the 99 dwellings (Land between Lodge Road and Tape Lane) at the adjacent site. It makes no difference if there are 3 or 99 dwellings – the fact is when the applicant carries out the sequential flood test, there will be many other alternative sites where 3 dwellings can be built that won't be subject to fluvial, pluvial and groundwater flooding to the extent that this site will.

2. INACCURACIES WITHIN APPLICANTS SITE BACKGROUND AND PLANNING HISTORY:

In an effort to minimise the implications of previous planning decisions on this site, in particular those for only 1 dwelling, the applicant has only gone back a decade, however ALL planning history must be listed and therefore to clarify I list the full planning history of this site:

- 051093 - 1 dwelling refused 2005 - In designated Countryside; Visibility at proposed access; loss, damage stress to boundary trees.
- 062272 - 1 dwelling refused 2006 - Reasons as per 051093
- 153431 - 12 dwellings refused 2016 - located in an isolated, unsustainable location and outside settlement limit; Urbanising and inappropriate; Insufficient info to assess Biodiversity and bats etc;
- 172894 - 5 dwellings refused (2017) and then dismissed at Appeal 2020 - (I believe the previous appeal was challenged by applicant and subsequently this was a second appeal).

In addition this site was a submitted site (5HU008) for the emerging LPU. It was omitted by WBC for the following reasons: Countryside (outside development limits) and unsustainable location (including reliance on private car) • Inappropriate mix of dwelling type • Poor housing amenity • Unacceptable impact on character O/2005/4959 & O/2006/8249 – Erection of one dwelling – Both refused.

The LPU HELAA stated that site was beyond a reasonable walking distance from a defined centre and that the whole of the site has the potential for groundwater flooding.

3. INACCURACIES WITHIN SUPPORT STATEMENT DATED NOVEMBER, 2025

- a) P1.2 The applicant suggests that this is an 'infill'. This is not the case. The land is very much an agricultural field outside the Settlement Limit in both the current plan and also the emerging local plan; This was confirmed by the Planning Inspector, Philip Major in Planning Appeal APP/0360/W/18/3194044 for 5 dwellings on the same site:

Paragraph 24 Philip Major states: *The Old Lodge on the western side of Lodge Road has an entirely different relationship with the countryside around it. However, as it is located outside the open space between Whistley Green and Sawpit Road, it does not register as having any significant impact on the character of that open space. Nursery Close to the south and the houses beyond that, are the first real sign of the 'built up' area proper, and it is here that they delineate the settlement boundary where the appeal site comes close to existing development within the settlement. I therefore reject any notion that the appeal site is developed on three sides.*

- b) P1.4 Contrary to the applicants view, the proposed development does NOT reflect the low density detached nature of the residential development in the area.
- c) P1.5 The access described as being in the "rough location" of existing access will be enlarged and highly visible **with 240 metres of visibility splay** (Pulsar Drwg 001) **removing at least 4 trees**, compromising the existing hedgerow which is older than 30 years and harm the root protection area of other trees. The introduction of this much larger access and visibility splays will be significantly harmful to the verdancy and rural aspect of the rural street scene.
- d) The applicant states that the '*balancing pond is not a requirement for the proposed development and is presented as a betterment to address existing surface water issues rather than because it is a requirement of the proposed development*'.
This is a ridiculous and ill-conceived statement evidencing just how dismissive the applicant is regarding the major issues of groundwater, surface water, pluvial and fluvial flooding this site has now and will have for the future.
- e) P2.9 the applicant makes the argument that if the future residents own electric vehicles this will make the site more sustainable. This is not the case. The choice of transport modes is still not there, as there is no guarantee that the residents of the new houses will own electric vehicles and even if they did, they would still be wholly reliant on their private cars rather than using alternative modes of transport such as cycling or walking. As previously stated by Hurst residents in other recent appeals and acknowledged by various inspectors, there are no designated cycle ways, very few pavements and a poor bus service. The B3030 is a busy, fast route, that is unlit.
- f) P2.10 The applicant confirms that this is not a 'significant' development. Therefore by their very own admission, it is barely relevant in contributing to the perceived lack of housing supply in the Borough as only two dwellings will be contributing to CIL (as the other is a self-build) and none are of a size or type that would be considered 'affordable' in Hurst. They have agreed that there will be a commuted sum, but again, this will be insignificant and this minor benefit does not outweigh the substantial harms caused by this proposal.

4. CONFLICT WITH CURRENT AND FUTURE POLICY

- a) **Conflict with CP9 AND CP17:** To make it very clear, this application conflicts with current CS Policy CP9. Hurst is a limited development location and it must be pointed out that the Hurst has contributed to the housing supply. This is evident by the recent approval of 23 dwellings between School and Orchard Road; 4 dwellings in Sawpit Road and 45 dwellings at North of Amen Corner and therefore has also fully complied with the applicants interpretation of policy CS Policy CP17, as Hurst has more than enough dwellings to support and stimulate the survival of the small number of local services it has.

Indeed as acknowledged by previous inspectors regarding policy CP17 this has been fulfilled over and above the requisite 100 maximum throughout the borough during the current plan period, so their

argument has little weight in claiming that 3 dwellings will contribute to the service provision and status of Hurst, in this regard – it won't.

In addition, Planning Inspector, Philip Major for Appeal Decision APP/0360/W/18/3194044 for 5 dwellings on the same site stated in Paragraph 12 with regard to CP9 *“The objectives of the policy clearly follow the intentions of the NPPF in seeking to guide development to locations where travel is reduced and a choice of travel mode is likely to be available. In my judgment this policy is therefore consistent with the NPPF and should be regarded as being up to date.*

b) **This site is unsustainable and conflicts with CP11 and emerging Policy SS4.**

This site is in conflict with CS Policy CP11, it does not fulfil any of the exemptions. Just as importantly, it does not align with the emerging LPU¹ Policy SS4 (which is gaining weight as it proceeds through the examination process) which states and also clarifies the purpose of the previous CP11 policy:

SS4: *As an exception, proposals for limited residential development adjacent to minor settlements will only be supported **where one of the following circumstances is met:***

a) *The proposal involves the partial or full redevelopment of **previously developed land** which would not unacceptably harm the character and appearance of the surrounding countryside or the rural setting of the village;*

b) *The proposal **represents limited infilling of an otherwise built-up frontage** and where the site is compatible with the core shape, form and size of the settlement; or*

c) *The proposal constitutes exceptions housing in accordance with Policy H4.*

d) **Residential development proposals outside the Green Belt and on unallocated sites adjacent to minor settlements will be refused.** *This includes when a five year housing land supply cannot be demonstrated, or the Housing Delivery Test indicates that the delivery of housing was below 75% of the housing requirement over the previous three years.*

In P3.18 and 4.2 the applicant concedes that there is policy conflict in terms of the sustainability of the location and the proposal fails the tests of Policy CP11 1-5 and yet at P5.8 conflicts their own statements by stating that *‘By applying the presumption in favour of sustainable development, planning permission should be granted as soon as possible’.*

It is very evident from previous appeals that this is not a sustainable development. Even if the unacceptable walking distances were acceptable to the very limited services this village has to offer, as Planning Inspector Philip Major confirmed for the same site (**Paragraph 30 APP/X0360/W/18/3194044**) *‘...distance is not the only indicator of whether a walk will be undertaken. In this case the walk would be along largely unlit roads, and along one stretch of unlit Sawpit Road, the lack of a footpath would be a disincentive to walkers – Sawpit Road is a shared surface. Traffic behaves as one would expect on a 30 mph village street with parked vehicles present – by taking avoiding action where necessary but not seemingly being aware of any increased propensity for pedestrian activity’.*

The Inspector then continues in Paragraphs 31 to 36 giving robust arguments as to why all other modes, other than the private motor car will not be used from any development on this site.

e) The planning statement (at 4.9 and 4.10) and the Transport Report does not acknowledge and is highly dismissive of just how unsafe walking along busy roads, such as the B3030, and along Sawpit Road, which is unlit for most of the way. As acknowledged by previous inspectors it is not conducive to walk at any time.

¹ As of 2nd February, 2026 the WBC LPU announced that Part 2 hearings for the emerging LPU will take place between March and June 2026.

In an effort to mitigate the danger, the Transport Report (**P2.11**) suggests that the residents can use the 'permissive path' on the opposite side of Lodge Road. First and foremost, this is a 'permissive path', therefore there is no guarantee that this path will be available in perpetuity and/or during the lifetime of this new development – permission can be withdrawn at any time. Secondly, this path is unlit, uneven, unavailable for those in wheelchairs and mobility scooters, it is muddy in part for most of the year. The photo supplied in the report of the footbridge does not prove that this is not a muddy path, which is what they are inferring.

5. HARM TO THE RURAL LANDSCAPE

Planning Inspector Philip Major robustly and eloquently states the significant amount of harm a development on this site will have on the landscape:

Paragraph 23: *...”In my judgement the site is an important component of the open space which separates the northern and southern arms of the identified settlement of Hurst/Whistley Green.*

He then goes on to state *’When travelling between the northern arm (Whistley Green) and the Southern arm on the approach to Sawpit Road, the clear character is that of a rural and largely undeveloped tract of land to the east of Lodge Road. The presence of Badgers Bottom [aka Poole House] to the north of the appeal site is no more than a minor intrusion into the rural scene, located as it is behind significant vegetation. I find it stretching a point too far to describe the land to the north of the appeal site as being developed in the sense of it being related to the settlement pattern. It is simply a well concealed country house in extensive grounds.*

Paragraph 26: *In visual terms the site also performs a function in clearly forming part of the gap between the developed areas. It is visible from the permissive path to the west, particularly when leaves have fallen from the trees. Although the boundary trees and hedgerows along the roadside of the site itself limit visibility of the paddock area, the boundary is an attractive (if unkempt) feature in its own right. Users of the permissive path can be regarded as sensitive to visual change since many of them will be using the path for recreational purposes. The change which would ensue from the development would be local significant and would be perceived as the extension of built development into the open countryside. The new access would be particularly urbanising feature with direct views into a cul-de-sac of large houses.*

The applicant has tried to suggest they are mitigating the significant visual harm by only having a line of 3 large, detached houses as opposed to the previous cul-de-sac format, but if anything this produces a 'wall' of development which will be highly visible from the permissive path, road and proposed value landscape area opposite (PVLA).

Paragraph 27: *Furthermore, the proposed dwellings would be seen from Tape Lane, albeit across the intervening open field. Nonetheless the houses would project above and between existing vegetation, again emphasising the extension of built development into the countryside. I accept that a landscaping scheme could address this to a degree over time, but 5 houses on the site are unlikely to be wholly hidden. Taken overall I consider that the visual impact of the proposal would result in moderate harm.*

It is obvious in the extreme that the new dwellings will have to be built high off the ground to avoid any future flooding and this will exacerbate the height and therefore visibility from Tape Lane resulting in far more than 'moderate' harm.

Paragraph 28: *The net result of the proposal would be there would be a harmful impact to both the character and appearance of the area for the reasons set out above. The development would not respect the transition between the built up area and the countryside. The fact that area of open land would be retained to the north of Badgers Bottom [aka Poole House] is not sufficient to ameliorate this harm. As such the proposal would be in conflict with the most important policies CC02, CP11 and this attracts significant weight. I also find conflict with Policies CP1 and CP3 of the Core Strategy in so far as the proposal would fail to maintain or enhance the high quality of the environment, would be detrimental to the landscape and would not be of appropriate character.*

6. INACCURATE TRANSPORT STATEMENT

In an effort to disguise the 'poor' bus service, Table 2.1 and Paragraph 6.6 of the Transport Statement do not highlight that the bus from Hurst does not run in the evenings or early mornings, is one of the most unreliable bus services as it has one of the longest journey times to reach Hurst and back. There is no direct bus service to the GP Surgery at Twyford. The inadequacy of the current bus service has been proven over and over again at planning appeals and is easily documented as WBC has used this in recent appeals in Hurst. Only a small percentage of residents catch the bus, due to unreliability, cost and inflexibility and the new residents will be the same.

With regard to cycling, Twyford has a reputation for bike theft, when the weather is inclement and the roads are flooded, people resort to their cars, usually incurring 2 journeys there and back, twice a day (not sustainable) as the parking at the station is woefully inadequate and expensive. The B3030 and A321 are very busy roads, the TS omits to state that there are no designated cycle routes. Commuter cycling is only for the experienced and not everyone has a bike, rides a bike or wishes to ride a bike along such busy roads.

There is no secondary school, GP Surgery, Post Office, Library, Chemist, or large supermarket within acceptable walking distance (and back from the destination). The small village shop carries very limited supplies – there is no longer a sub-post office and the bakery has been closed for some time.

It conflicts with **CP6 as it does not give reasonable and safe choice** in the mode of transport the residents will use, neither does it improve the existing infrastructure, or enhance road safety.

INCORRECT TRICS OUTPUT. As ever with these types of applications, the Transport Statement has used inappropriate comparisons in the TRICS. Of the 4 areas 'selected' 3 are edge of Town and 1 is a Suburban Centre, all of which are sustainable and **none of these align with a site that is in the countryside and on the extremities of a semi-rural village, with very limited facilities and poor public transport.** Therefore the calculation of how many trips the future residents will take is woefully underestimated and almost every journey will be by private motor car as the safety of walking to and from the few amenities is compromised by lack of pavements, speeding traffic and darkness.

7. CONFLICT WITH ESTABLISHED WILDLIFE AND HABITAT CORRIDORS

The Ecology Report and the Environmental Report fail to acknowledge that the site is:

- Opposite the Loddon Valley Gravel Pits Biodiversity Opportunity Area
- Adjacent to a designated (November 2025) Berkshire Local Network Recovery Strategic Area (Land between Tape Lane and Lodge Road).
- Opposite the Proposed Loddon Valley Valued Landscape Area

Therefore this application under NPPF Paragraph 192 FAILS to protect and enhance the very evident biodiversity and geodiversity on and around the site. The application FAILS to include a wildlife habitat corridor before, during and after the construction, which would allow the existing large mammals including foxes, [REDACTED] and deer who regularly use this site to travel unharmed through and around the development leading from the Biodiversity Opportunity Area through to the adjacent LNRS and beyond.

8. UNACCEPTABLE DRAINAGE STRATEGY, CAUSING FLOOD RISK to the wider area.

a) Failure to observe the S19 Flood Investigation Report (2024) for Hurst

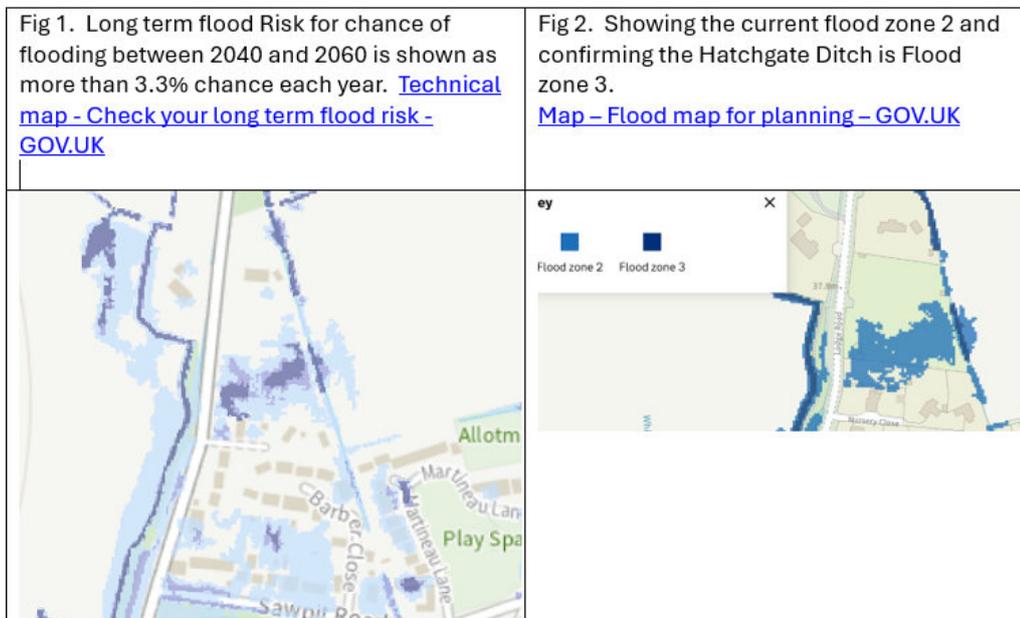
First and foremost, the application has chosen to ignore the fact that in 2024 WBC carried out a S19 Flood Investigation into Hurst. The conclusion of this report was that Hurst is a flood plain, that areas (including this site) are prone to flooding and the Storm Event to cause flooding in **Hurst is now 1 in every 3 years. Not 1 in 30, 100 or 1000 years!**

b) Presumption of Failure of Sequential Flood Risk Assessment

The applicant has confirmed that the site would fail a Sequential Flood Risk Test although appear unwilling to carry out a test. They then go on in great detail to try and justify why such a failure doesn't matter. The fact is, they should be made to carry out a Sequential Flood Risk Test. The majority of the site is in Flood Zone 2 and runoff will (as it does now) flow into a Flood Zone 3 (Hatchgate Ditch) and surrounding properties. In no uncertain terms, Paragraph 174 of the NPP Framework says that development should not be permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. That is a strongly worded policy. Since there are bound to be reasonably alternative sites available in this case, it follows that the development should not be permitted.

c) Inadequate Surface Water Drainage Strategy

To prove my point the Figures 1 and 2 below provided by the Government site for checking Long Term Flood Risk shows categorically that between 2040 (only 14 years away) and 2060 the site shows that there is a 3.3% chance of serious flooding as currently the majority of the site is within FLOOD ZONE 2 and will flow into Hatchgate Ditch which is currently designated a Main River and is FLOOD ZONE 3.



There is no doubt that to build on this site whilst suggesting that the *'balancing pond is not a requirement'* (See my S3 Para d) which the drainage strategy completely relies upon, confirms the inadequacy and poorly conceived thinking behind the proposed drainage strategy which proposes that surface water is discharged into this balancing pond (Flood Zone 2) which then discharges into Hatchgate Ditch (Flood Zone 3) which it neither owns or is responsible for, has no licence to do so and

in doing so will undoubtedly and substantially increase the flood risk to those properties in Barber Close, Martineau Lane, Nursery Close etc

d) Inadequate Sewage Treatment Strategy

The applicant is also relying on a sewage treatment plant to treat the sewage from these 3 large properties and then discharge treated effluent into the Flood Zone 3 Hatchgate Ditch – this is unacceptable strategy in a flood zone and given the groundwater vulnerability of the site.

e) Groundwater Vulnerability Pollution Risk

The groundwater vulnerability in the Environmental Report in and within 50m of the site is the second highest on the vulnerability scale, which means it is an area which is able easily to transmit pollution to groundwater. This site is within 50 metres of where the (licensed) leachate emission continues to run from the nearby landfill site into a ditch opposite the site, which can easily overflow towards this site. This is a potential hazard with the increased flooding forecast. In addition any contaminated runoff from the suggested sewage treatment plant, softscaping and hardscaping from this development will automatically run into the Flood Zone 3 Hatchgate Ditch and affect the biodiversity and neighbouring properties.

To conclude

This development conflicts with Policy CP1, it cannot demonstrate that it will reduce the need to travel by private car, neither can it ensure the provision of adequate drainage. It does not avoid increasing (and where possible reduce) risks of or from all forms of flooding (including from groundwater).

I disagree with the Planning Statement 4.8 That ‘There is no actual harm that would result from granting permission for houses on the site’. This is an utterly and totally irresponsible application in so many ways. There will be significant harm, this application will undisputedly fail the sequential flood risk test and if allowed will exacerbate flooding and pollution at the nearby properties and beyond. It is quite clear from the NPPF and NPPG that mitigation of flood risk cannot be guaranteed in perpetuity. Active mitigation measures cannot be relied on to justify not satisfying the sequential test.

For the reasons given above, the harms do not and cannot outweigh the very minor benefits and therefore this application, like all those beforehand, should be refused.

Lou Robinson