

PLANNING REF : 242067
PROPERTY ADDRESS : Linden House
: Tape Lane, Hurst, Berks
: RG10 0DP
SUBMITTED BY : Mr Huw Griffiths
DATE SUBMITTED : 17/09/2024

COMMENTS:

Objection to planning application 242067 - Land between Lodge Road.

I am writing as a resident of Hurst to object to the above planning application.

The site has a long history of planning applications which have all been refused in addition there have been several planning appeals to the Planning Inspectorate all of which have been dismissed. A clear indicator that the site is not suitable for sustainable development. The latest planning appeal for 200 was proposed by the same developer as this application for 99 homes was dismissed by the Planning

Inspectorate on the 9th March 2023. The Inspector's decision was after much consideration of many aspects of planning policy and the NPPF, which resulted in three main conclusions:

1. Despite a tilted balance in light of the 5 year Housing Land Supply, Wokingham's key policies relevant to the application still carried significant weight in assessing the application.
 2. The site is not a location that can currently be considered sustainable and does not meet the three sustainability tests as set out in the NPPF.P.8.
 3. The proposals cause substantial harm that significantly and demonstrably outweighs the benefits offered.
- The new development proposals merely seek to circumnavigate and at best insignificantly mitigate the reasons for the dismissal at appeal and do not resolve these reasons for the dismissal.

On Page 26 Para 137 of the Inspector's report he concludes that:

"I have found that the policies which are most important for determining this proposal accord strongly with the requirements of the Framework, especially with regard to the need to promote and secure a sustainable pattern of development, and I have therefore concluded that these policies should still carry significant weight in this appeal".

Since the dismissal there has been no significant change to the situation and it's clear the current proposal is contrary to the same planning policies that the previous application for 200 homes failed to comply with as decided in the Wokingham Borough Council's planning committee decision to refuse the application and later in the subsequent appeal decision on the 9th March 2023 which dismissed the Developer's appeal.

I have not tried to list out the policies that this application fails to comply with as I am confident your planning officers (amongst others) will identify these policies in their refusal of the application, but instead would like to reinforce the findings of the appeal on the 9th of March as the same issues apply. Firstly, it should also be noted that the decision by the Inspector to refuse the last appeal for 200 homes was made with full consideration of the lack of a 5 Year Housing Land Supply Wokingham held at the time and the tilted balance was applied. This situation

I believe remains the same.

There are no significant factors that should affect the weighting of the titled balance the Inspector applied to his decision in March 2023 and Wokingham's Policies still align closely with the NPPF framework and significant weight should still be applied to the policies that are most important to determining an application on the site. As the Inspector clearly stated in para 137 (excerpt above).

In March 2023 the site of the proposed development was deemed not to be a sustainable location. Once again nothing has changed to alter this position and today the site remains in a location that is not "sustainable" for the same reasons as provided in the Inspectors report.

The reduction in housing numbers does not improve the sustainability of the location. and the

NPPF Para 8 (excerpt below) set out objectives for sustainability.

"Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

a) an economic objective - to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
b) a social objective - to support strong, vibrant and healthy communities, by

ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support

communities' health, social and cultural well-being; and

c) an environmental objective - to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy

The reduction in the number of houses from 200 to 99 does not achieve any economic objectives set out in the NPPF Para 8. the reduced proposals are still providing the wrong homes in the wrong place with no provision of infrastructure other than mitigation of the developments adverse impact to existing local infrastructure. This is not sustainable.

As with the scheme for 200 homes the site fails to deliver any social objective, with a very significant 23% increase in homes sitting parasitically outside the existing settlement boundary and community. The scheme still fails entirely to form a cohesive

community bond between new and existing residents. This is exasperated with a remote access from Lodge Road that simply encourages car usage.

Car usage is the only realistic mode of transport to any destination for the new residents whether it be shopping for groceries, visiting the doctors, school runs, catching the train etc. all need to be accessed by car.

The introduction of a minibus service by the Developer is further divisive to the community, being restricted to the new residents only (with no use allowed for the existing community). In reality the provision of a minibus is simply not a realistic, or long term, economic initiative, providing little benefit for the new residents, no benefit for the existing community and unlikely to be funded by the new community when it becomes clear that it has significant cost and is unused, or at best use by only a handful of new residents.

By way of a worked example; If a mini bus made one trip to Twyford train station in the morning and one return trip in the evening at a cost of say 100 per trip, @ 365 days a year this would amount to an annual cost of c 73,000. If this cost was to be split equally between all residents of the new development, then the cost would be an annual cost of 737 per household. This does not represent good value and penalizes those who do not use the service or cannot afford it, such as the affordable housing occupants. If this charge was only to be applied to the private dwellings, then the cost would be 1,474. The reality is that to be a useful service the minibus would need to be available for more trips, which would simply add costs.

Unfortunately, the reality of the situation is that once the developer has departed the minibus would cease to exist and the car will prevail as the primary transport mode.

It is very clear the Inspector's view is that the previous scheme proposed for 200 homes did not meet these three sustainable objectives and there is nothing in the new developments proposals for 99 units demonstrably changes this.

Anecdotally you would think that a reduction of 50% from 200 to 99 new homes would have less impact on the environment, but the reality is that you cannot crack half an egg. There is no halfway position.

The reduced number of homes will have an equal adverse impact on the environment compared to the scheme of 200 homes, for whilst the quantity is less the intrusion into the local environment remains equal with an un-defendable intervention to the countryside with clear urbanization. Less development on the site does not make the location more sustainable.

The inspector considered the sustainability of the location and the harm on the wider environment and concluded very clearly substantial harm would arise with development (not characterized by size) that cannot outweighed by the benefits proposed: Para 139.

"I consider that substantial harm arises from the fact that the appeal proposal is plainly in conflict with the Council's spatial vision set out in the adopted development plan policies to which I have already referred. This harm is added to, at the upper end of

the moderate scale, by the adverse impact which the proposed development would have on landscape character and in visual terms. Modest harm also arises from the loss of BMV agricultural land. In addition, and taking a precautionary approach on this matter, some further harm arises as a result of the lack of clarity as to whether the appeal proposal would have an acceptable impact on ecology and biodiversity. Whilst the appeal proposal would give rise to some benefits, as detailed above, my clear conclusion is that the adverse impacts of the proposal would significantly and demonstrably outweigh these benefits, such that the proposal should not succeed."

The new proposal for 99 homes remains a significant amount of development and whilst the developer has tried to appease the impact with illustrative information, the improved design intent, more open space (described as "visual amenity"), rerouting the bus, unlikely to succeed cycle lanes, etc. the impact of the development remains significant with substantial harm will occur and the benefits proposed will not outweigh this, even if the proposal set out actually materialize.

The design information provided in the new proposals remains entirely indicative and there is no way of ensuring this quality of development proposed will be achieved once a consent is granted. This situation means that the harm is more likely to become more substantial as the development is delivered.

Even when it comes to the affordable provision which was probably the only aspect of the scheme that could arguably be considered moving towards a benefit the new scheme proposes 50% of 99 units are affordable, which is a total of 49.5 units. This compares to the dismissed proposal of 40% of 200 homes, which is 80 affordable homes. The Inspector in his findings was clear that the benefits that may have occurred with 80 units in the 200 schemes were demonstrably outweighed by the significant harm. Therefore, how can a reduction of 30 affordable units be considered as an increase in benefit for the new scheme. So, the harm remains at best the same as when the Inspector made his decision, and the benefits are in fact reduced.

Notwithstanding the debate on number and tenure and benefit of affordable housing the fact remains that proposed affordable housing is a requirement of development and is not a benefit to the local community. The question of the location of affordable housing was acknowledged in the Inspectors report and the conclusion is clear the location is not sustainable for housing (that includes affordable housing and private housing). The proposed affordable housing does not create any additional benefit sufficient to outweigh the substantial harm caused by the 99 houses.

As stated at the beginning of this objection, this site has had a long planning history and despite many attempts by developers to develop the site this has not been successful. The overriding reason for this is that the site is not a sustainable development site. This was re-affirmed as recently as 18 months ago in the Inspectors decision on the 9th of March in which after much consideration he dismissed an appeal and the fact the site has failed to be identified as suitable for development in past and emerging local plans.

The site Is not a sustainable location and provides no benefits to outweigh its harm so I object to the planning application and ask you to refuse this application.

Yours Faithfully

Huw Griffiths MRICS

Linden House, Tape Lane, Hurst.