

**Land Between Lodge Road and Tape Lane,
Hurst, Wokingham, RG10 0EG**

Appellant's Design Proof of Evidence

PINS Ref: APP/X0360/W/25/3364304

Wokingham Borough Council Ref: 242067

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on behalf of

Mactaggart and Mickel Strategic Land

Contents

Section 1. Introduction.....	3
Introduction of the Witness.....	3
Qualifications.....	3
Section 2: Relevant Planning Policies	6
Section 3: Understanding Context	7
Section 4: Development Principles and Parameter Plan	20
Section 5: Response to Design Issues in RFR 1&3	24
Section 6: Response to additional Design Issues in LPA SoC and Officer's Report	29
Section 7: Summary and Conclusion	31
Appendix 1.....	33
Appendix 2.....	36

List of Figures

- Figure 1: Strategic Location Plan**
- Figure 2: Wider Settlement Plan**
- Figure 3: Historical Evolution Summary Plan**
- Figure 4: Development Parcel Scale Comparison**

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Section 1. Introduction

Introduction of the Witness

Qualifications

- 1.1. I am Marcus Adams a registered architect and a member of the Royal Institute of British Architects (RIBA), educated in the UK with Bachelor of Arts degree and a post graduate diploma in architecture and a master's in urban design and regeneration. I have been a member of the RIBA 1993.

Professional experience

- 1.2. I am Managing Partner of JTP with responsibility for the strategic planning and management of the practice.
- 1.3. JTP is an award-winning international placemaking practice of architects and masterplanners with extensive experience of delivering successful projects for both private and public sectors throughout the UK and internationally. From our studios in London and Bristol we undertake placemaking projects at every scale, from cities and towns, to neighbourhoods, streets and the design of individual buildings; creating new places and breathing life into old ones.
- 1.4. I have been Managing Partner of JTP since 2006 and am supported by the practice's Board of Partners, enabling me to maintain a hands-on approach to projects.
- 1.5. I am an architect and urban designer with substantial experience of working in both private and public sectors to lead the design and delivery of new neighbourhoods, large scale regeneration, and strategic placemaking projects in the UK and internationally.
- 1.6. I am a committed placemaker and drive design excellence and innovation throughout the practice through community planning, our charrette methodology and internal design reviews.
- 1.7. I am a passionate believer in environmental and social sustainability and delivering nature recovery networks and bio-diversity net gain, bringing this passion and experience to every project I work on.
- 1.8. I have pioneered JTP's Design Code methodology across an increasing range of major projects and have spearheaded JTP's ascent to leaders in the field of masterplanning and placemaking at

strategic scale – driven by a commitment to creating and sustaining high quality in new neighbourhoods.

Relevant Projects

- 1.9. Examples of relevant projects I have been responsible for are included in Appendix 1

Instruction

- 1.10. I was approached by the Appellant in 2025 to consider Wokingham Borough Council's (WBC) reasons for refusal (RFR) (Decision Notice, **CD 1.1**). The Appellant asked whether I could provide expert evidence for an appeal in support of the Appellant's case, to address matters pertaining to design because the Appellant's consultant, Mosaic (who was responsible for designing the scheme), was unavailable.
- 1.11. Having reviewed the submitted material, completed a preliminary desktop study and visited the site I concluded that I could appear on behalf of the Appellant. I consider the appeal proposals as described in development principles set out in the DAS (**CD 1.5**) and limits set by the Parameter Plan (**CD 1.4**) to be an appropriate response to the Site's context in design terms.

Approach and Evidence Structure

- 1.12. My evidence will focus on the design issues within RFRs 1 and 3. The relevant sections are in bold below:

RFR 1. *The proposal results in an unsustainable pattern of development by reason of the creation of a new unplanned large housing estate on a greenfield site in the countryside outside of settlement limits. **It would be significantly out of scale with neighbouring small village of Hurst and the level of existing infrastructure within the village.** The development is contrary to the spatial objectives of the development plan and policies CP1, CP2, CP3, CP6, CP9 and CP11 of the Core Strategy, CC01, CC02, CC03 and TB21 of the MDD Local Plan, the Borough Design Guide SPD and section 2, 4, 8, 9, 12 and 15 of the NPPF.*

RFR 3. ***The proposed development will have a detrimental impact on the landscape and the character and appearance of the area by reason of the quantum, scale, parameters and location of the development. It would result in the loss of characteristic landscape features and erode of the separation between existing villages and their rural setting.** The development is contrary to policies CP1, CP3,*

CP9 and CP11 of the Core Strategy, CC01, CC02, CC03 and TB21 of the MDD Local Plan, the Borough Design Guide SPD and section 12 & 15 of the NPPF.

- 1.13. In addition to design matters, RFRs 1 and 3 refer to issues of planning, sustainability, infrastructure and landscape. These issues, which are closely related to design, will be addressed in the Proofs of Evidence provided by members of the Appellant's consultant team with the relevant specialisms although there is likely to be some overlap with my evidence.
- 1.14. My evidence supports the appeal against the decision by Wokingham Borough Council ('WBC') to refuse an outline planning application for *'the proposed erection of up to 99no dwellings, green infrastructure, public 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).'*
- 1.15. I will focus on the Parameter Plan (**CD 1.4**) rather than the Illustrative Masterplan (**CD 1.3**) because as described in the DAS (**CD 1.5**) Page 6 *'This Outline Planning Application is based on fixed parameters rather than a fixed masterplan. The accompanying illustrative material serves as one example of how the development could be implemented, but is not the only way, in accordance with the development parameters.'*
- 1.16. However, I will refer to the contextual analysis and set out in the DAS (**CD 1.5**) which underpins the development principles and the Parameter Plan and will supplement the analysis in the DAS with my own analysis of the site and its context based on my site visit and desktop studies. I will use this evidence to demonstrate how the Appellant's Parameter Plan reflects an appropriate design response to the Site's constraints and opportunities, and to the character and context and historic growth of Hurst in compliance with national and local planning policy and therefore why I do not agree with the LPA's RFRs 1 and 3 in terms of design.
- 1.17. The structure of my evidence is set out below:
- Section 1: Introduction
 - Section 2: Relevant Planning Policies
 - Section 3: Understanding Context
 - Section 4: Development Principles and Parameter Plan
 - Section 5: Response to Design Issues in RFR 1&3

Section 6: Response to additional Design Issues in LPA SoC and Officer's Report

Section 7: Summary and Conclusion

Declaration

- 1.18. The evidence I have prepared and provide in respect this Proof of Evidence is true and has been prepared and is given in accordance with the guidance of my professional institution, and I confirm that the opinions expressed are my true and professional opinions.

Section 2: Relevant Planning Policies

2. Relevant Planning Policies

National

NPPF

- 2.1. The National Planning Policy Framework (NPPF) was first published on 27th March 2012 and has received several subsequent updates. A revised NPPF was published on the 12th of December 2024 after a consultation over the summer of 2024 once the Labour party was voted into power in July. The revised NPPF makes significant changes to the Framework in a move towards boosting housing delivery.

National Design Guide

- 2.2. The National Design Guide (NDG) sets out the Government's priorities for well-designed places in the form of 10 characteristics based on NPPF chapter 12: Achieving well-designed places. The NDG's 10 characteristics are context, identity, built form, movement, nature, public spaces, uses, homes and buildings, resources and lifespan. Page 19 of The DAS (**CD 1.5**) includes a table setting out how the principles of the NDG have been embedded in the DAS and underpin the parameter plans, design principles and illustrative masterplan.

National Design Code and Guidance Notes for Design Codes

- 2.3. The National Design Code expands on the 10 characteristics set out in the NDG and provides detailed guidance on the production of Design Codes. The Associated document, Guidance Notes for Design Codes, which is structured on the NDG's 10 characteristics, provides guidance on the requirements for contextual analysis and explains how this should inform design.

Local

Development Plan

2.4. Wokingham Borough Council (WBC)'s Development Plan documents are comprised of the following:

- Core Strategy (2010) **(CD 12.1)**
- Managing Development Delivery Plan (2014) **(CD 12.2)**
- Joint Minerals and Waste Plan (2023)

2.5. WBC has commenced the process of working on a New Local Plan which will replace the current Core Strategy and Managing Development Delivery Plan.

Supplementary Planning Documents

2.6. The relevant design Supplementary Planning Documents (SPDs) are:

- Sustainable Design and Construction SPD,
- Wokingham Borough Design Guide SPD June 2012,
- A Design for Hurst SPD March 2005

2.7. Appendix A of the DAS **(CD 1.5)** explains how the Appellant's design scheme aligns with the objectives of A Design for Hurst.

Section 3: Understanding Context

3. Understanding Context

Introduction

3.1. In this section I will explain the context of the Site with reference to the requirement to relate new development to its context as set out in the National Design Guide which states that the *'context, history and character of an area must influence the siting and design of new development. This context includes the immediate surroundings of the site, the neighbourhood in which it sits and the wider setting. This includes: an understanding of how the scheme relates to the site and its local and wider context and the value of the environment, heritage, history and culture.'*

3.2. I will make reference to the contextual analysis in the DAS which has been undertaken in accordance with Guidance Notes for Design Codes which states: *'It is necessary to undertake a context study of the area surrounding the site and the wider area for a full understanding of the place in order to respond positively to its*

distinctive features. Well-designed buildings need to respect and enhance their built and natural environment surroundings whilst addressing local constraints, the vision for its area type and responding positively to new issues such as innovation and environmental sustainability.

- 3.3. The check list for a contextual study in Guidance Notes for Design Codes includes the following: *'The network and hierarchy of surrounding streets, public transport, walking and cycling routes, notable local buildings, the characteristics of the local community, local shops and facilities, views, vistas and landmarks, such as places of worship, and the grain of the area, variation in built form, street scene and roofscape, landscape and natural features such as hedges, green spaces, trees and woodland, boundary features such as walls, fences and hedges, water features including rivers, lakes, canals, flood risk and other water features, topography, the local building vernacular, architecture, proportion, façade pattern and proportion, architectural details and materials such as the use of brick, stone or render for walls, slate or tile for roofs etc, colours, textures, shapes and patterns.'*
- 3.4. I will illustrate how the village of Hurst has grown over time and explain how this has informed its character today.
- 3.5. I will explain that contrary to the suggestion in RFR 1 which states that the proposed development would be of an inappropriate scale, the proposed development parcels described in the Parameter Plan would be of a similar scale to previous phases of Hurst's expansion and the proposed development is entirely consistent with the growth of Hurst.
- 3.6. I will describe the structure of the village and identify the characteristics and features that contribute to its distinctive character. I will also identify how the Site currently contributes to the village character.
- 3.7. I will discuss the reversed C form of the village and explain why I disagree with the view that the proposed development on the Site would *'erode the separation between existing villages and their rural setting.'*

Wider Context

- 3.8. The Site is located in Hurst, a village 2.4 km south of Twyford. Hurst is within the jurisdiction of Woking Borough Council for planning matters and is part of the civil parish of St Nicholas Hurst. It lies to the east of the river Loddon, between Reading and London. Figure 1 is the *Strategic location plan* from Page 8 of the DAS.

- 3.9. Figure 2, *the Wider settlement plan*, shows the Site in relation to Hurst and the wider area. It illustrates that Hurst is one of a series of smaller settlements which are set within countryside crossed by major road infrastructure and surrounded by larger settlements. The Site forms part of the land partially encircled by Hurst village to the west of the B3030 Lodge Road.
- 3.10. The area is generally flat but with the land rising very gently from the Loddon Valley towards the village. There is a small but prominent hillock, surrounded by mature trees which is the site of St. Nicholas's Church and a Conservation Area.
- 3.11. The landscape around Hurst is characterised by areas of open fields and woodland, often linked by hedgerows with mature trees. Water courses and ponds are also features.
- 3.12. The village is located on the A321 Twyford to Wokingham Road. There are a number of other smaller areas of sporadic development on roads extending from the village, the main ones being along Davis Street on the B3030 Twyford to Winnersh Road, along the B3034 Forest Road, from Bill Hill to Binfield and on Broadcommon Road.
- 3.13. The *Connectivity plan* on Page 23 of the DAS illustrates the walking and cycling distance to a range of facilities within Hurst and Twyford, and the Strategic connectivity plan on Page 25 of the DAS illustrates the public transport, pedestrian and cycle network in the wider area.
- 3.14. The Site is an 8-minute cycle ride from Twyford train station and a 10-minute cycle ride from Winnersh train station. Twyford and Winnersh are both served by fast and regular Great Western train services to Reading and London. Twyford is also on the Elizabeth Line.
- 3.15. The A321 runs through Hurst providing connections to Twyford to the north and the A404(M) via the A4, enabling broader strategic connections to London and the Midlands.

Figure 1 Strategic Location Plan

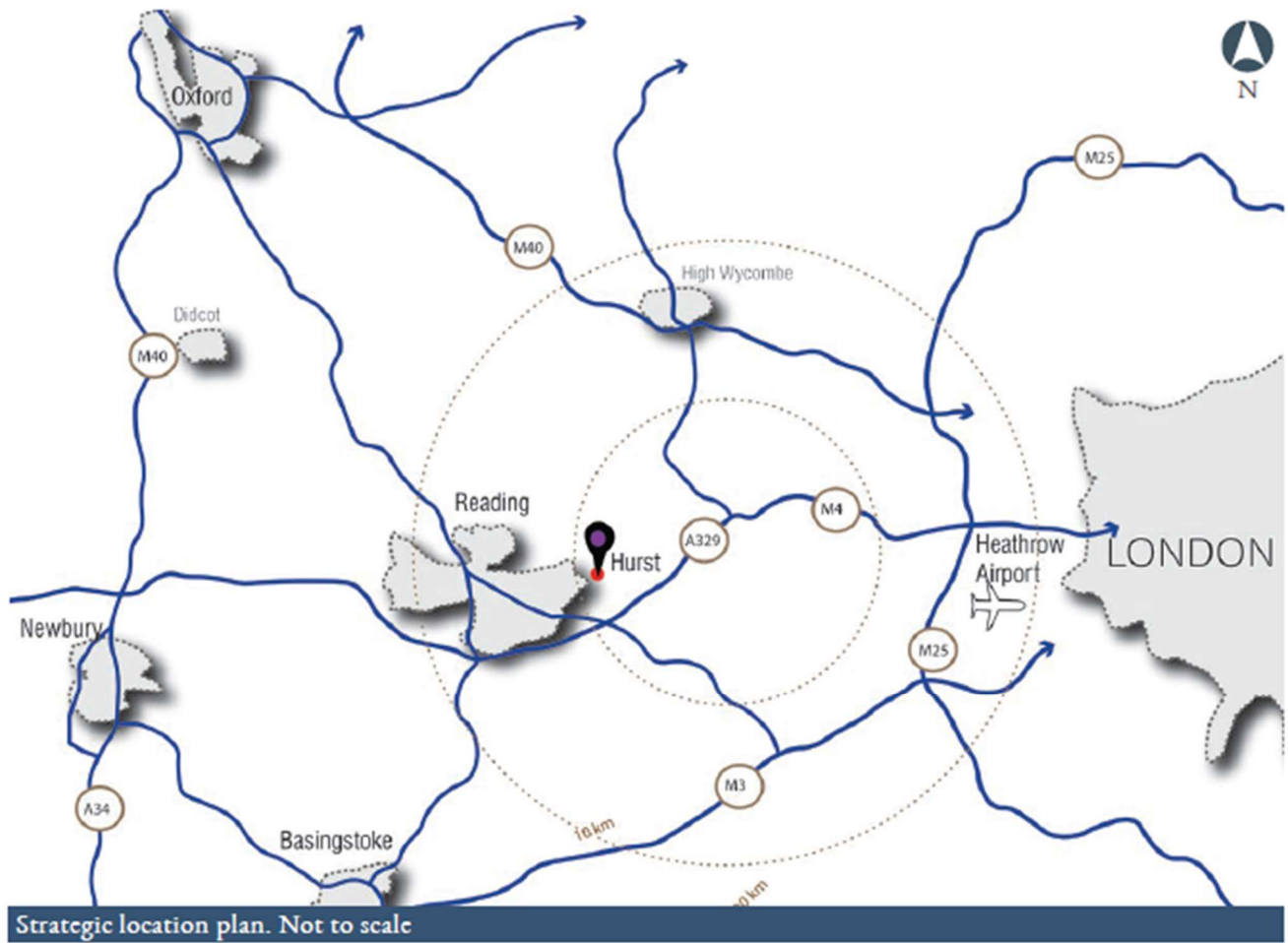
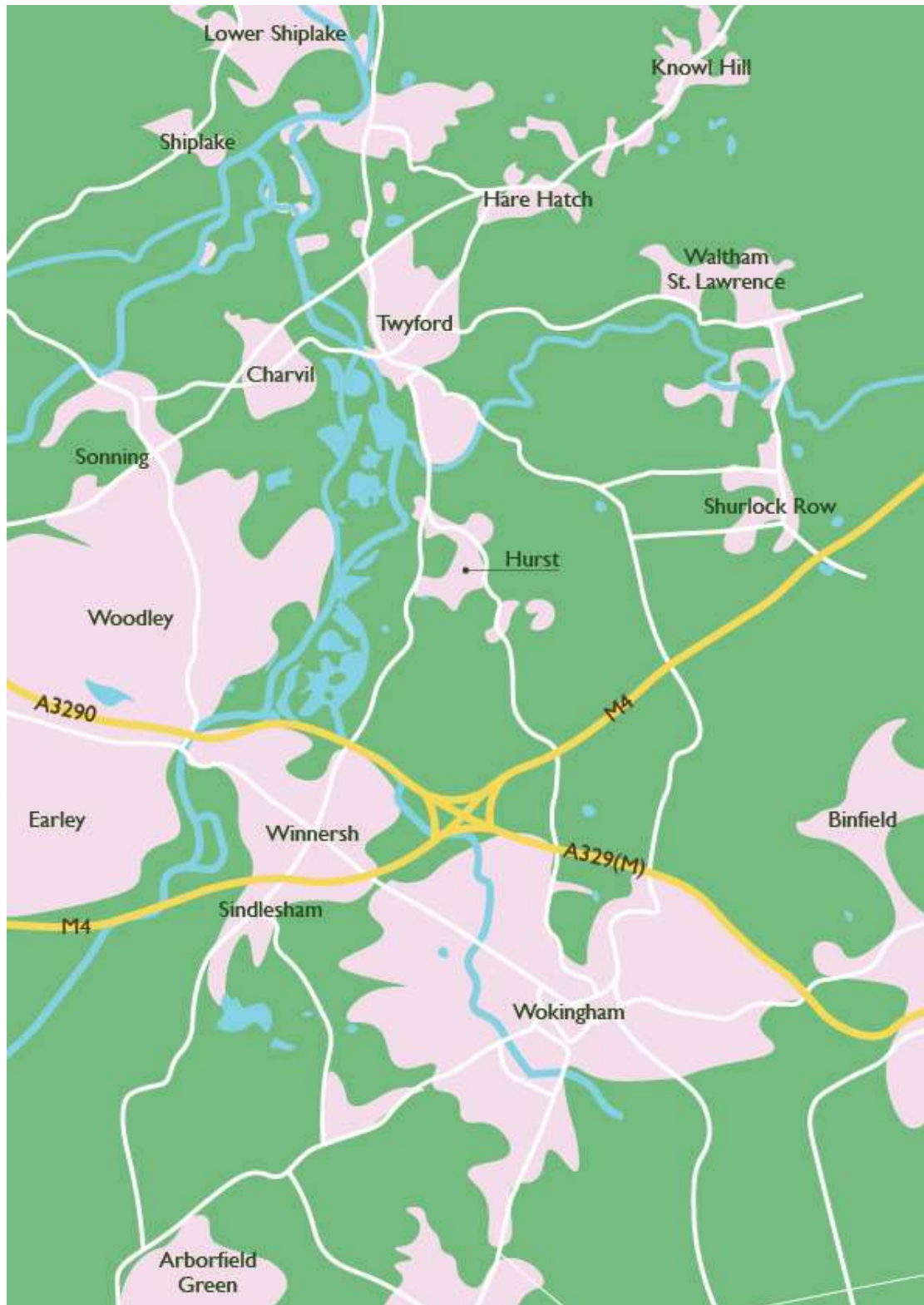


Figure 2 Wider Settlement Plan



Village historical evolution

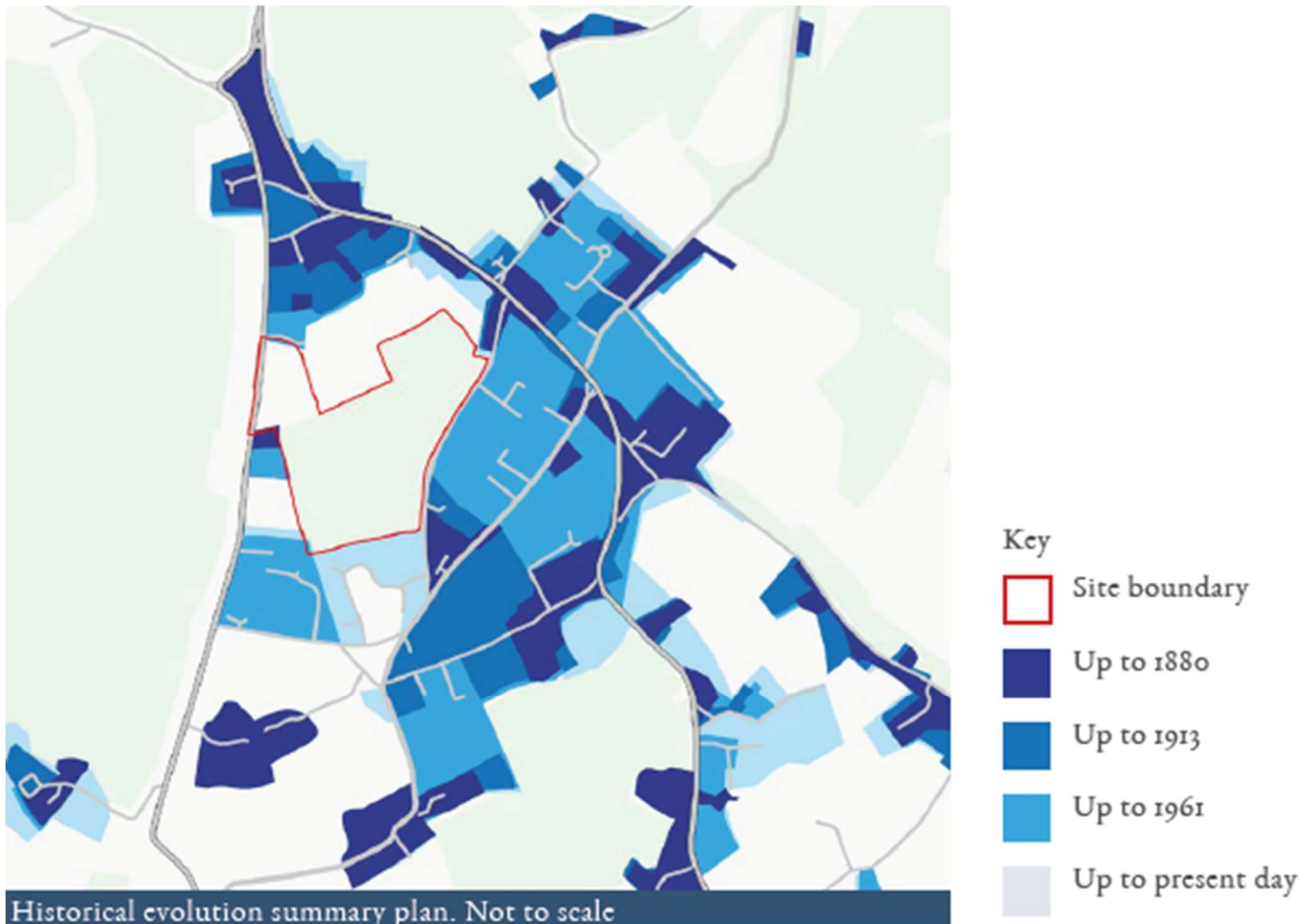
- 3.16. The way in which Hurst village has grown over time is key to understanding the form and character of the village today. Figure 3 the *Historical evolution summary plan* from Page 28 of the DAS illustrates the historic pattern of growth.
- 3.17. Appendix 2 includes a set of historic maps between 1912-2005 illustrating the growth of the village and highlighting the size of some more recent housing developments. It shows that these recent developments are of a similar scale to the three development parcels proposed in the Parameter Plan.
- 3.18. I will refer to the historic maps in the section below where I demonstrate that the size of development parcels proposed in the Parameter Plan are of a similar scale those illustrated on the 2005 map.
- 3.19. I will also use the maps to explain the structure of the village and its character.

Early settlements

- 3.20. A Design for Hurst SPD includes a description of the evolution of the village prior to 2005. In this section I have drawn on this description to highlight issues that help understand the character of the village today which is relevant to RFR 3.
- 3.21. Whistley (Anglo-Saxon wisc = marshy ground; ley = a meadow) was catalogued in the Domesday Book in 1086. Three years later a church dedicated to St Nicholas was built for the Parishioners of Whistley on Church Hill. Hurst (meaning woody hill) is only mentioned in 1220.
- 3.22. The Forest of Windsor which extended westwards to the River Loddon was cleared from the 13th century onwards, both to create arable land and for its timber. With the dissolution of the monasteries, the new secular owners of the land began building appropriate houses for themselves and developed estates on land in and around Hurst.
- 3.23. By the early 17th Century there was a small building boom as many smaller cottages were built to house their servants and farmworkers. This established the settlement pattern of isolated small groups of buildings. The largely agricultural nature of the Parish continued until the second half of the 20th century.

3.24. St. Nicholas's Church and its immediate surrounds, including the Almshouses, the Castle Inn, and church cottages date from the 17th Century or earlier, and now form the Conservation Area. Elder Cottage in Whistley Green dates back to the 16th Century.

Figure 3: Historical Evolution Summary Plan



3.25. The roads which cross at Townsend's Pond form the framework upon which the Wards Cross and Whistley settlements grew. It was in this area that the trades and shops were established, together with the other elements of a village, such as schools, public houses and village halls. Although there are still houses dating back to the 16th and 17th century, most of the buildings are from the 19th and early 20th century.

3.26. Prior to 1880, development was focused around the separate historic settlements creating small clusters of buildings generally centred on crossroads. This stage of growth led to pubs, churches, schools, shops and other local facilities being dispersed along the roads and lanes that run through the village rather than clustered together in a central place.

- 3.27. During the late 19th and early 20th centuries new development occurred along the main through roads resulting in the separate settlements of Ward's Cross and Whistley Green becoming linked together.

1912

- 3.28. The 1912 map in Appendix 2 shows an organic network of roads and smaller lanes following field boundaries. Ward's Cross and Whistley Green are almost linked by residential properties on Broadwater Lane. There is a large gravel pit between Tape Lane and School Lane to the east of the Site. Two schools and a working man's club are noted as well as nurseries, farms and a large area of allotments.
- 3.29. The boundaries of the two fields that make up the Site are evident, and it is notable that the larger field (230) is significantly larger than the fields to the north and east.
- 3.30. Whistley Park occupies all the land to the west of the B3030 Lodge Road. St Nicholas's Church and the Castle Inn are shown to the south adjacent to Hurst House which is set within its extensive parkland.

1912-1980

- 3.31. The period between 1933 and the 1980s indicates slow incremental growth with more semi-detached homes extending south-east from Ward's Cross and a new row of semi-detached homes facing Sawpit Lane.
- 3.32. The land between Tape Lane and School Road is the focus for most growth as land formerly occupied by the gravel pit and nursery is built out with a mix of street fronting houses and small culs de sac.
- 3.33. The village hall is built next to the working man's club and a recreation ground and cricket ground created at the junction of Wokingham Road and School Road.

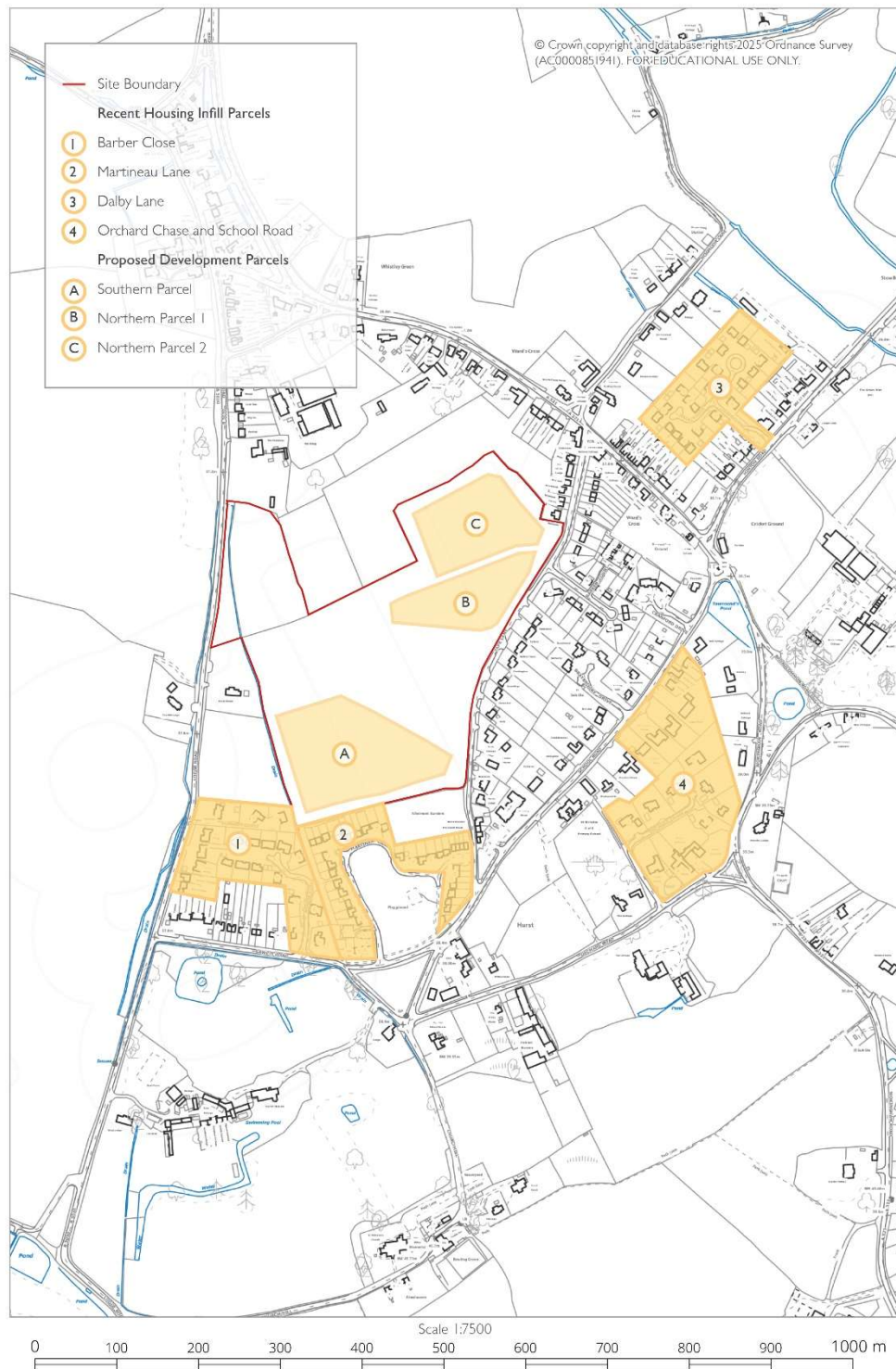
1980s-2005

- 3.34. The 2005 map shows an accelerated rate of growth between the 1980s and 2005. Two adjacent parcels of land to the north of Sawpit Road were built out in the form large culs de sac at Barber Close and Martineau Lane. Barber Close is located behind the frontage of older properties facing Sawpit Road. Martineau Lane includes an open space described as a village green which includes a play area. These developments start to infill land between Tape Lane

and Lodge Road. Martineau Lane is on land formerly used as allotment gardens.

- 3.35. Dalby Lane is an infill cul de sac development behind existing frontage on Hinton Lane at Ward's Cross, whilst Orchard Chase cul de sac and associated street fronting homes on School Road form another significant development parcel.
- 3.36. More recently, the site of the Nursery at Whistley Green has been developed for housing, infilling land to the rear of properties facing Lodge Road and Broadwater Lane.
- 3.37. Figure 4 Development Parcel Scale Comparison provides a comparison of the size of four recent development parcels at Barber Close, Martineau Lane, Dalby Lane and Orchard Chase with the three proposed development parcels shown on the Parameter Plan. It shows that the proposed development parcels are of a similar scale to the existing parcels.

Figure 4: Development Parcel Scale Comparison



Village Character

- 3.38. The evolution of Hurst has resulted in a village characterised by dispersed facilities and a loose arrangement of separate housing enclaves in a variety of styles set within a network of roads and lanes. The roads and lanes are generally quiet and characterised by a mix of built and green frontage. The built frontage is very varied and includes buildings from different eras, often set back behind front gardens with boundary hedges. This is interspersed with green frontage of mature field hedgerows with trees. Green verges and views of green spaces also contribute to the rural character of the village.
- 3.39. Behind the street frontage remnants of historic field hedgerows and ditches, often with lines of mature trees, form a strong framework enclosing and separating many of the more recent developments. The combination of this strong landscape framework and the location of infill housing on culs de sac behind older street frontage, screens many of the housing estates from the public streets, provides a sense of seclusion for residents within the enclaves, and contributes to the quiet and rural character of the village's lanes and streets.

Whistley Green and Hurst

- 3.40. Whistley Green has its own identity which derives from its origins as a settlement pre-dating Hurst. However, it is physically linked to Hurst by residential development fronting Broadwater Lane and, like the rest of Hurst, it comprises of buildings in a variety of styles reflecting the time they were built. These range from Elder Cottage, which dates back to the 16th century, to early 20th century semi-detached houses on Lodge Road and new infill development at Nursery Gardens with detached houses similar to those found elsewhere in Hurst. Local facilities are shared by residents of Hurst and Whistley Green so that the settlements function as a single village.
- 3.41. From the A321 Broadwater Lane the continuous built frontage along the road makes Whistley Green and Hurst appear to be a single settlement. This differs from the experience of travelling on the B3030 Lodge Road where, travelling from north to south, there is a change in character from Whistley Green's built frontage to the north, to the field hedgerow and woodland on the Site boundary, then to large properties further to the south set in their own grounds and on to the Barber Close and Sawpit Road developments which are screened by trees and hedgerows.

The 'reversed C'

- 3.42. The Village of Hurst has been described as a 'reversed or inverted C'; the C shape being formed by the linkage of Whistley Green to the rest of Hurst by houses fronting Broadwater Lane which back onto field pastures. As explained above, this shape has been created by the process of developing along road and lane frontages followed by infilling fields behind. The base of the 'reversed C' is formed by two recent developments (Barber Close and Martineau Lane) infilling land between Tape Lane and Lodge Road. It is a shape that exists at this point in the evolution of the village and there seems no rationale in rigidly fixing the shape as it is at this point in time.

Views of green space

- 3.43. Views into the surrounding countryside or to green spaces within the village contribute to the rural character of Hurst. However, views out of the village towards open countryside are often screened by woodland and hedges which contributes to the distinctive secluded character of the village.
- 3.44. Views of green spaces within the village from the streets and lanes include views of the recreation grounds, football ground and cricket field which contribute to the loose grained, green, character of the settlement.
- 3.45. Views into the Site from the Tape Lane and Lodge Road are very limited and filtered by the mature boundary hedges and trees.
- 3.46. The view of the Martineau Lane's small village green from Sawpit Road is an example of how a new development contributes positively to the rural character of Hurst. However, the green space seems closely associated with the homes overlooking it rather than a space that welcomes the wider community, so that its function as a traditional village green is limited.

Typologies

- 3.47. As described in Pages 29-45 of the DAS the village is characterised by a very wide range of building typologies and architectural styles defined by the era of their development. No architectural style or period is dominant overall.

Height

- 3.48. It is notable that most buildings are two storeys tall.

Density

3.49. Pages 34-35 of the DAS analyse the densities of both historic and modern development throughout the village. Densities of 29-33 dwellings per hectare are evident in some areas of narrower development plots – typically these are older houses but there are some more modern examples. There are also areas of large plots with densities as low as 5 dwellings per hectare. The proposed development described in the DAS has a density of 25 homes per hectare which seems a reasonable choice for the location and reflects a sensitive response to context whilst making efficient use of land for new homes. NB: Martineau Lane, which adjoins the Site, has a density of 26 dwellings per hectare.

The Site

- 3.50. The Site is 10.68 hectares in size and consists of two field parcels currently used for pasture. Mature trees and hedgerows line the site's boundaries, providing a strong sense of enclosure from within the Site and screening it from views in.
- 3.51. There are no Public Rights of Way across the Site. Access to the fields is from field gates on Lodge Road and Tape Lane.
- 3.52. To the north of the Site boundary are small fields and a residential property. These fields adjoin other small fields which are bordered by new residential development at Nursery Gardens in Whistley Green.
- 3.53. To the east lies Tape Lane which has a hedgerow boundary with a field gate providing access into the Site. Views into the Site from Tape Lane are screened and filtered by the boundary hedgerow. There are residential properties fronting Tape Lane on its eastern side and on both sides on its northern section which joins Broadwater Lane.
- 3.54. To the south the Site borders the Tape Lane Allotments and the rear gardens of homes in Martineau Lane. Filtered views of the rear of properties on Martineau Lane are visible from the Site through the screen of trees in gardens and the field boundary hedge.
- 3.55. To the west, the northwestern edge of the Site borders the B3030 Lodge Road whilst the southwestern edge borders large residential properties set within grounds and accessed from Lodge Road. This boundary is very heavily screened by mature trees and hedgerows which follow the line of a watercourse. There is a field gate into the smaller of the two pastures from Lodge Road.

3.56. The topography of the Site is flat.

Section 3 Summary

3.57. In summary, I have highlighted relevant features of the Site's wider context and referred to the contextual analysis in the DAS which underpins the design of the proposed development as required by Local and National planning policies.

3.58. I have explained how the piecemeal evolution of Hurst has shaped the form of the village settlement.

3.59. I have highlighted the contribution that the network of historic streets and lanes with their varied built frontage and hedgerows make to Hurst's rural character.

3.60. I have explained how housing areas behind the street and lane frontage are screened from public view and separated from each other by remnants of the historic field and ditch pattern, and that this contributes to the secluded character of these housing enclaves and the quiet character of the lanes.

3.61. I have highlighted the predominance of low densities and two storey development in the village.

3.62. I have highlighted the variety of architectural styles reflecting different eras.

3.63. I have explained the contribution to village character made by views of green spaces in and around the village and the limited contribution that the Site makes to Hurst's character due to limited views in and lack of public access.

3.64. I have explained the Site's key features, boundary conditions and access points.

Section 4: Development Principles and Parameter Plan

4. Development Principles and Parameter Plan

4.1. In Section 4, I will explain how analysis of the Site and its context has informed the development principles set out in the DAS and is appropriately reflected in the Parameter Plan. This explanation will support my argument that development brought forward within the

limits set by the Parameter Plan will not have a '**detrimental impact on the landscape and the character and appearance of the area by reason of the quantum, scale, parameters and location of the development.**'

Development Principles Reflected In Parameter Plan

- 4.2. The 10 Development Principles set out in Pages 62-67 of the DAS demonstrate a landscape-led approach to masterplanning the Site. Principles 1-7 set out the elements of green infrastructure which will combine to create the multifunctional green space within which the development parcels will sit. Principles 8 and 9 relate to movement and Principle 10 to the form of development.
- 4.3. *Principle 1. Retain, enhance and establish landscape features.* This principle is reflected in the Parameter Plan by limiting hedgerow removal to two localised sections to accommodate access points on Lodge Lane and Tape Lane. Locations of all other existing vegetation and trees are marked for retention and root protection zones for veteran trees are safeguarded. Areas with opportunities for hedgerow improvements are established. These parameters will ensure that hedgerows and trees, which contextual analysis has demonstrated make such a significant contribution to the village character, are retained and strengthened.
- 4.4. *Principle 2. Maintain the site's sense of openness between Lodge Road and Tape Lane through the establishment of new publicly accessible infrastructure.* The Parameter Plan excludes built development from the view corridor between Tape Lane and Lodge Lane. This will preserve the rural character of the B3030 Lodge Lane to the south of Whistley Green and help Whistley Green maintain its separate identity. It will create space for a generous publicly accessible common and preserve filtered views through the hedgerow on Tape Lane over the common which will contribute to the village's rural character. As identified in the contextual analysis, views over green open space are an important aspect of the village character.
- 4.5. *Principle 3. Establish landscaped gateway entrances.* The Parameter Plan designates areas around the Lodge Road and Tape Lane entrances as landscaped areas. This provides an opportunity for detailed landscape plans that filter views into the Site to be developed at Reserved Matters stage.
- 4.6. *Principle 4. Establish a multifunctional perimeter green infrastructure network to accommodate proposed tree planting, including veteran trees, a sustainable drainage network, and a network of cycle and pedestrian paths.* The Parameter Plan

designates areas around the Site's edges as green infrastructure to accommodate multiple community uses including the sustainable drainage network with ponds and swales which will be a key feature of the Site and contribute to the village character. The perimeter green space also safeguards root protection areas for veteran trees on the Site boundary and will support the function of trees and hedgerows as wildlife corridors. It will reinforce the Site's landscape edge on Tape Lane.

4.7. *Principle 5. Create a community orchard and extend the allotments on Tape Lane to encourage a sense of community spirit, promote healthier eating habits, enhance biodiversity and improve well-being.* The Parameter Plan designates an area for the expansion of the allotments and provides space for the community orchard in a location which will maintain a rural character to the section of the A3030 south of Whistley Green. As noted in the contextual analysis, the absence of built development in this area helps reinforce the identity of Whistley Green. Introducing more allotments and orchards also reflects the village's historical links to growing food that have been lost as former nurseries and allotments have been developed to accommodate housing as explained in Section 3.

4.8. *Principle 6. Establish multifunctional green and tree-planted landscape corridors within developed areas to weave landscapes through the built environment, create an attractive outlook for new homes establish wildlife corridors, and encourage walking and cycling from the doorstep.* The Parameter Plan shows the two proposed development areas in the north of the Site separated by a strip of green infrastructure associated with the access street. This requirement will help break the development into smaller parcels, reflecting the size of earlier infill development in the village. It indicates an expectation of tree planting in the linear space between the two parcels which could extend the line of trees located to the west and replicate the structure of housing enclaves within a treed landscape and drainage framework found throughout much of Hurst.

4.9. The alignment of the green and tree-planted landscape corridor within the southern development parcel is not set on the Parameter Plan, but the Parameter Plan key specifies 'incidental open space and landscaping' which indicates opportunities for including green corridors at Reserved Matters stage.

4.10. *Principle 7. Create a central publicly accessible 'common' to help maintain a sense of openness across the Site.* The Parameter Plan designates and fixes the dimensions of the large area of green space for the publicly accessible common. (A dimension of approximately

121m widening to 154m between the frontage of the north and south development parcels is shown on the Principle 7. diagram in the DAS.) It will contribute to the rural character of Hurst and create a sensitive transition from the built-up areas of the village to the wider countryside to the west, although views into Whistley Park are very heavily screened by woodland so that there is no visual connectivity.

- 4.11. An indicative location for a required Local Landscape Area for Play (LLAP) is shown on the Parameter Plan near the southern development parcel. This space will be a significant new amenity for the village and a major benefit for the wider community. It is larger than the 'village green' at Martineau Lane, and its size, central location, and accessibility provide an excellent opportunity to make it a space for village events as well as a quiet space for enjoying exercise and nature. The Landscape strategy plan on Page 77 of the DAS illustrates how it could be successfully brought forward at Reserved Matters stage with strong tree lines and drainage ponds reflecting landscape features characteristic of Hurst.
- 4.12. *Principle 8. Create a comprehensive, sustainable, and active travel strategy for the Site.* The Parameter Plan sets out a movement corridor through the Site linking Tape Lane to Lodge Road. The detailed design of infrastructure for pedestrians, cycles and vehicles will be developed within this corridor. The access from Tape Lane is designated for buses, cycles, pedestrians and emergency vehicles only.
- 4.13. An indicative location for the mobility hub including, short-stay cycle parking, a bike repair/cycle maintenance area, a bus stop, car club parking space and parcel drop-off/pick up locker is shown within the movement corridor. This approach reflects sustainable design principles to encourage walking, cycling and public transport for local journeys and should protect the quiet character of the village streets and lanes. The alignment of off-road pedestrian and cycle routes is not prescribed by the Parameter Plan, but a pedestrian and cycle access from Tape Lane via the Site's southern boundary is shown. The Landscape Strategy plan illustrates how direct routes on desire lines through the Site linking the two access points on Tape Lane with one on Lodge Road could work, and how they would link to the network of paths running around the perimeter of the Site.
- 4.14. *Principle 9. Create a network of attractive, green and healthy streets.* The Parameter Plan does not indicate where these streets would be located within the development parcels which is a sensible strategy as Parameter Plans should avoid being too prescriptive. The

principle of creating a network of attractive, green and healthy streets is however a good one.

4.15. *Principle 10. Create a diverse mix of up to 99 beautifully and sustainably designed homes that seamlessly integrate with and reflect the unique character of Hurst.* The Parameter Plans define three development parcels, two to the north of the Site and one to the south. As described above, the two northern parcels are separated by a strip of green infrastructure associated with the access road corridor. This requirement will help break the development into smaller parcels with structural landscaping reflecting some of the characteristics of infill development within the village. The combined area of the Parameter Plan development parcels is 3.89 hectares. If 99 dwellings were proposed on the land the density would be 25 dwellings per hectare which would not be out of character with the village.

4.16. The Parameter Plan limits the height of dwelling houses within the parcels to two storeys which is the predominant height of dwellings in Hurst.

Section 4 Summary

4.17. In Summary, I have explained how the limits set in the Parameter Plan will shape proposed development in a way that is sensitive to the Site's context and the character of the village.

4.18. The creation of a large area of publicly accessible open space in the form of a common between the development areas also recognises the opportunity to bring forward local facilities alongside housing for the benefit of the wider community.

Section 5: Response to Design Issues in RFR 1&3

5. Response to Design Issues in RFR 1&3

5.1. In this section I will explain why I disagree with the suggestions in RFRs 1 and 3 that the proposed development described in the Parameter Plan:

- would be significantly out of scale with the neighbouring small village of Hurst,
- would erode the separation between villages and their rural setting, and.

- would be detrimental to the character and appearance of the area.

Scale

- 5.2. Section 7.6 of the LPA Statement of Case (CDXX) states *'The scale and quantum of the proposed development are wholly disproportionate when assessed against the size and character of Hurst. The village has historically grown through small-scale, incremental expansion, and the proposal would disrupt this pattern with a sudden, large-scale insertion of built form. This would be visibly apparent, resulting in an abrupt and unsympathetic contrast with the established settlement pattern. The housing land supply shortfall does not change the scale of development that is appropriate for this small rural.'* (I assume the word 'village' has been omitted in error here).
- 5.3. As demonstrated in Section 3 and illustrated by Figure 4., the scale and quantum of the proposed development are similar to those of the more recent phases of village growth comprising the four cul de sac housing infill developments at Barber Close, Martineau Lane, Dalby Lane and Orchard Chase.
- 5.4. As demonstrated in section 4, the Parameter Plan splits the quantum of housing proposed (up to 99 homes) into three separate parcels. As illustrated in figure 4., these parcels are each similar in scale to these four cul de sac housing developments which are highlighted in the 2005 map in Appendix 2.
- 5.5. Views of the proposed development from the village will be heavily screened by the existing mature hedgerows on the Site boundaries which will be strengthened by new planting around the Site's perimeter.
- 5.6. The Parameter Plan locates two of the development parcels to the north of the Site and one to the south, separated by wide area of green space (approximately 121 m at its narrowest point).
- 5.7. The outer edges of the proposed development parcels will be tucked in against the heavily treed boundary hedges and watercourse which will be protected and enhanced with additional landscaping as explained in Section 4.
- 5.8. Views of the edges of development parcels facing the new public open space 'the common' will be filtered through new landscaping including strong tree lines as illustrated by the landscape strategy on Page 77 of the DAS.

5.9. The combination of reinforced boundary hedgerows and new planting around the edges of the common will create a framework within which to new housing enclaves will sit.

5.10. This proposed development's design strategy will create a pattern of development that reflects the scale of recent village expansion and also reflects the pattern of infilling former agricultural fields, whilst retaining the landscape structure of treed hedgerows and watercourses, that has characterised the late 20th and early 21st century village expansion.

Height

5.11. The Parameter Plan limits development within the parcels to dwelling houses up to two storeys in height. This vertical scale parameter reflects the predominant scale of buildings within Hurst.

Separation

5.12. The issues of loss of characteristic landscape features, and erosion of the separation between existing villages will be addressed in the Proofs of Evidence prepared by the Appellant's planning and landscape consultants. However, I will address the issue of separation between Whistley Green and Hurst.

5.13. Whistley Green's origin as a separate settlement pre-dating Hurst underpins the perception of its separate identity. It is not a separate village but a part of Hurst which has been physically joined to development at Ward's Cross since at least the early 20th Century. Like other parts of Hurst, it has a variety of styles of building including houses recently built on the site of a former nursery at Nursery Gardens.

5.14. Whistley Green's separation is visible on the B3030 Lodge Road which has a rural character to the south. This contrasts with the character of Lodge Road further north where early 20th century semi-detached homes in Whistley Green create strong built frontage on the road.

5.15. The design of the proposed development demonstrates a sensitive approach to Whistley Green by excluding any development on this frontage and maintaining a sense of openness through the creation of the large central green space, the common. The design will retain the rural character on southern part of Lodge Lane and screen views into the Site.

5.16. The Parameter Plan will create a landscaped entrance on Lodge Road B3030 as described in Section 4 which will help retain the rural character of the road. The bent form of the access road leading

through the smaller of the Site's two fields will ensure that development on the Site is well screened from the Lodge Road entrance. Travellers on Lodge Road will have the impression of a green gap to the south of Whistley Green.

- 5.17. The northern development parcel will be screened by the hedgerow and mature trees on the Site's northern boundary and separated from homes at Whistley Green by small fields to the north of the Site. Opportunities for improving the landscaping around the development parcel's perimeter and further strengthening the screening and enclosure of the new development will be created by the landscaped perimeter strip designated in the Parameter Plan.
- 5.18. In design terms, the Parameter Plan therefore reflects a sensitive approach to the preservation of Whistley Green's separate identity on the B3030 Lodge Road.

Character and Appearance

- 5.19. In Section 3, I have defined what gives Hurst its distinctive character today by looking at the past evolution of the village and identifying features that make the place distinctive. The process has highlighted how each era of development contributed something different as the place responded to wider changes in the economy and society; from the building boom in the early 17th century to create cottages for servants and farm workers, to provision of recreational facilities, and different forms of housing to suit changing needs. The historic maps also show that some things were lost including many orchards, nurseries, and Sawpit Road's large allotment gardens which were once part of the village's economic and social life.
- 5.20. The process of change has left a variety of features that people value such as Hurst's organic network of characterful lanes, mature trees and hedgerows, ponds, historic buildings, homes in a variety of different styles, and a unique village structure rooted its origin as separate clusters of buildings that have become linked and expanded over time.
- 5.21. In Section 4, I explained how the landscape-led design approach has shaped the design principles and informed a Parameter Plan that responds sensitively the village context and character by:
- retaining and strengthening boundary hedges with additional landscaping and creating buffers to protect roots of trees and encourage corridors of wildlife habitat supporting the rural character,

- creating a strong landscape framework into which the proposed development parcels will be tucked, reflecting the character of previous larger housing developments in Hurst,
- reinforcing the perception of Whistley Green as a place with its own identity through the design of the Lodge Road landscaped entrance with its curved access road and community orchard,
- maintaining and enhancing the rural character of Tape Lane and the B3030 Lodge Road,
- screening and filtering views into the Site
- creating new ponds which are a characteristic feature of the village,
- preserving openness and views over open space within the Site including filtered views from Tape Lane westwards towards the B3030, which contribute to the village's rural character.

5.22. The development principles for movement are also sensitive to the village character and context and the Parameter Plan is designed to encourage walking, cycling and public transport which will help preserve the quiet nature of the village lanes and streets.

5.23. As described earlier, the development area is designed as three separate parcels to respond to the parcel sizes characteristic of late 20th century and early 21st century village expansion.

5.24. The number of homes proposed overall will result in an average density of around 25 homes per hectare which reflects the average densities within the village. As detailed designs are developed this density can be varied across the parcels to create variety, which is a characteristic of Hurst, reflecting the approach illustrated in the DAS.

5.25. Height is limited to two storeys which is characteristic of Hurst.

Opportunities

5.26. As well as setting limits on development which aim to avoid harm to the character of the village, the proposed development principles and Parameter Plan reflect major opportunities to improve the character of the village and its amenities.

5.27. The unusually generous size of the Site's larger field, in comparison with other fields in the village, creates a unique opportunity to provide a generously proportioned new public open space for the benefit of the wider community in the form of a common. The dimensions of this space are fixed by the Parameter Plan.

- 5.28. A Local Landscape Area of Play (LLAP) will be located where it is well-overlooked by new homes. Its size is fixed by the Parameter Plan.
- 5.29. A community orchard and allotments reflecting the village's agricultural past, reinforcing Hurst's rural character and encouraging community cohesion and healthy lifestyles are included.

Section 5 Conclusion

- 5.30. In conclusion, my evidence has;
- demonstrated that the scale of development is appropriate for Hurst in terms of design,
 - shown how the design will protect the separate identity of Whistley Green by providing appropriate separation and screening on the B3030, and
 - explained why the Design Principles and Parameter Plan reflect a good design response to the Site constraints and opportunities which would allow a development of up to 99 homes to be delivered in a manner that is sensitive to the village's character and context.
- 5.31. Therefore, there is no case for refusing the Appeal on grounds of design as suggested in RFR1 and 3.

Section 6: Response to additional Design Issues in LPA SoC and Officer's Report

6. Response to additional Design Issues in LPA SoC and Officer's Report

- 6.1. The LPA's Statement of Case and the Officer's Report include references to some design issues which have not been included in the RfRs. I will address these issues in this section.

LPA's Statement of Case (SoC)

- 6.2. Section 7.7 of the LPA's SoC (**CD 2.2**) summarises the design concerns as follows: *'Overall, the location of the access road, parameters of development, and the overall scale would result in a scheme that is visually and functionally incongruous. The development would neither reflect the existing settlement's grain nor successfully integrate with its surroundings. Instead, it would appear as a disconnected and poorly integrated development that results in lasting and unacceptable harm to the character and appearance of the area. This harm would not diminish or assimilate over time but would continue to erode the village's distinct rural*

identity. The proposal is therefore contrary to section 12 of the NPPF, which seeks to secure well-designed places that respond positively to local character and reinforce a strong sense of place. '

- 6.3. My evidence has explained that the overall scale of the proposed development is similar in scale to previous recent infill housing developments in the village. Section 4. explains how the design principles in the DAS have informed the Parameter Plan and reflect a sensitive approach to the character of the village based on an understanding of its historic evolution and unique settlement pattern. I have explained how the landscape-led approach will provide a framework for the proposed development parcels that reflects the characteristic structure and grain of the existing settlement's recent housing developments, which have been culs de sac set within the framework of historic field boundaries. I will not repeat my explanation here.

The Access Road

- 6.4. The LPA's concerns about the access road which are detailed in Section 7.4 of the LPA Statement of Case **(CD 2.2)** include: the location of the access 'in an isolated position along Lodge Road, away from the core of Hurst village', and its detachment from the main built form of development. The access road is described 'an uncharacteristic and visually intrusive urban feature, unlike the typical lanes in Hurst, which are enclosed, modest in scale, and well-integrated into the landscape'. It is described as lacking 'definition, enclosure, or relationship with built form.'
- 6.5. As explained in the DAS, the proposed entrance on Lodge Road will provide vehicular, pedestrian and cycle access for up to 99 homes. The internal network of streets, footpaths and cycleways will be designed in accordance with the Manual for Streets adopting healthy street principles with walking and cycling prioritised. There will be two pedestrian and cycle accesses on Tape Lane as well as an emergency and bus only access.
- 6.6. This approach to movement is designed to retain the quiet character of the village streets and lanes.
- 6.7. The vehicular access to Lodge Road is not associated with built frontage as described in Section 5 to maintain the rural character of the B3030.
- 6.8. The Parameter Plan designates a corridor within which the vehicular access will run. The corridor runs close to the boundary hedge to the north of the proposed common, and then between the two northern development parcels. Its detailed design will be brought

forward at Reserved Matters Stage and will include associated landscaping reflecting the approach illustrated in the landscape strategy in the DAS.

- 6.9. The form of the access on Lodge Road mirrors that previously agreed with WBC in conjunction with the previous application for the Site and has been subject to a Stage 1 Road Safety audit.

Officer Delegated Report

- 6.10. Page 18 of the Officer Delegated Report **(CD1.2)** includes an assessment of the design which includes the key issues brought through into the RfR and LPA SoC **(CD2.2)**.
- 6.11. Many of the criticisms of the design relate to the suggestion that the proposed development does not reflect Hurst's characteristic pattern of development. It states: *'The failure to relate well to the existing pattern of development in the village is also compounded by proposed landscape buffers between the housing areas and the existing settlement, which creates an uncharacteristic separation and detachment from the compact village form.'*
- 6.12. As described in my Proof, Hurst does not have a compact form. It is a village with a distinctively loose structure, created by clusters of buildings that became linked together over time and infill cul de sac housing developments set within a landscape structure including field hedgerows.
- 6.13. The proposed development will reflect this structure as well as preserving openness across the centre of the Site.
- 6.14. The Officer Delegated Report makes multiple references to the suburban character of the proposed development and seems to assume 'suburban' is a derogatory term and unreflective of Hurst's character. However, the cul de sac infill housing that comprises much of Hurst's recent growth is suburban in style and density.
- 6.15. The detailed criticisms in the Report therefore seem to be based on a misunderstanding of Hurst's character and the way the proposed development reflects it.

Section 7: Summary and Conclusion

7. Summary and Conclusion

Summary

7.1. My evidence has focused on explaining how the evolution of Hurst over time created the structure and character of the village.

- I have identified the features that contribute to the village's rural character,
- I have illustrated the scale of recent infill housing developments and demonstrated that these are similar in size to the proposed development parcels,
- I have explained how a landscape-led approach has informed the design and will create a green infrastructure framework for the new homes that appropriately reflects the character of Hurst,
- I have explained how the design will maintain separation between Whistley Green and Hurst on the B3030 Lodge Lane,
- I have explained that the proposed design will maintain openness between Tape Lane and the B3030 Lodge Road, and last but by no means least,
- I have highlighted the generously sized new public open space in the form a rural common that will be a significant benefit to the wider community.

Conclusion

7.2. In conclusion I believe the proposed development illustrated by the design principles in the DAS and the Parameter Plan provides a sound basis for developing the detailed design and delivering well-designed, high-quality homes on the Site. I do not believe the design issues within RFRs 1 and 3 or the design concerns within the LPA's Statement of Case and the Officer's Delegated Report are reasons to refuse the Appeal.

Appendix 1

Examples of Marcus Adams' relevant projects



Kings Barton in Winchester.

Client: Cala Homes

A new suburb influenced by landscape, topography and biodiversity

Kings Barton is a sustainable new suburb to the north of Winchester, which will be integrated with the city centre and its neighbouring communities. Once completed, it will include 2,000 private and affordable homes, a primary school, commercial and community uses, public open space, sports pitches, children's play areas, a village green and a town square. The masterplan was informed by a detailed analysis of Winchester suburbs and their character.



Knowle Park in Cranleigh

Client: A2 Dominion

A landscaped-led neighbourhood forming a new edge to the countryside

Covering a total of 38 hectares and located to the south-west of Cranleigh in Surrey, Knowle Park will deliver a unique place that is part of the rural landscape and provides 265 new homes. Dwellings will be provided in a variety of house types, sizes and tenures including affordable homes across the neighbourhood to support a socially sustainable community and aspirations of people at different stages of their lives.



Smallfield in Surrey

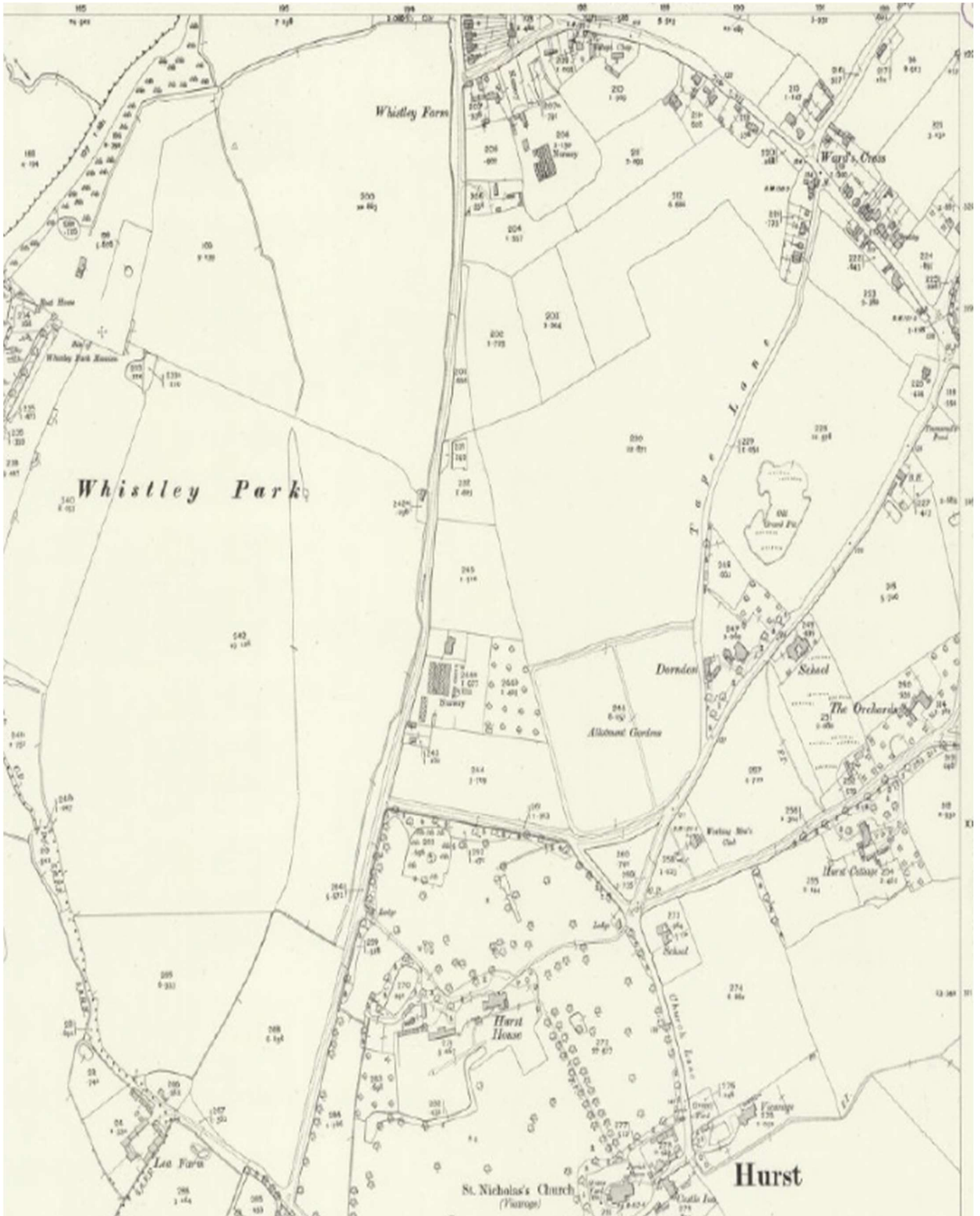
Client: Landform Estates

A new neighbourhood sensitively integrated with its surroundings

A landscape-led, sustainable extension to the existing village with 120 new homes (40% will be affordable) ranging from one-bedroom flats to four-bedroom family homes. Existing tree lines and hedgerows will be incorporated and enhanced, and two major areas of open space will be created. The neighbourhood's edges will be defined by a richly planted new boundary to the Green Belt.

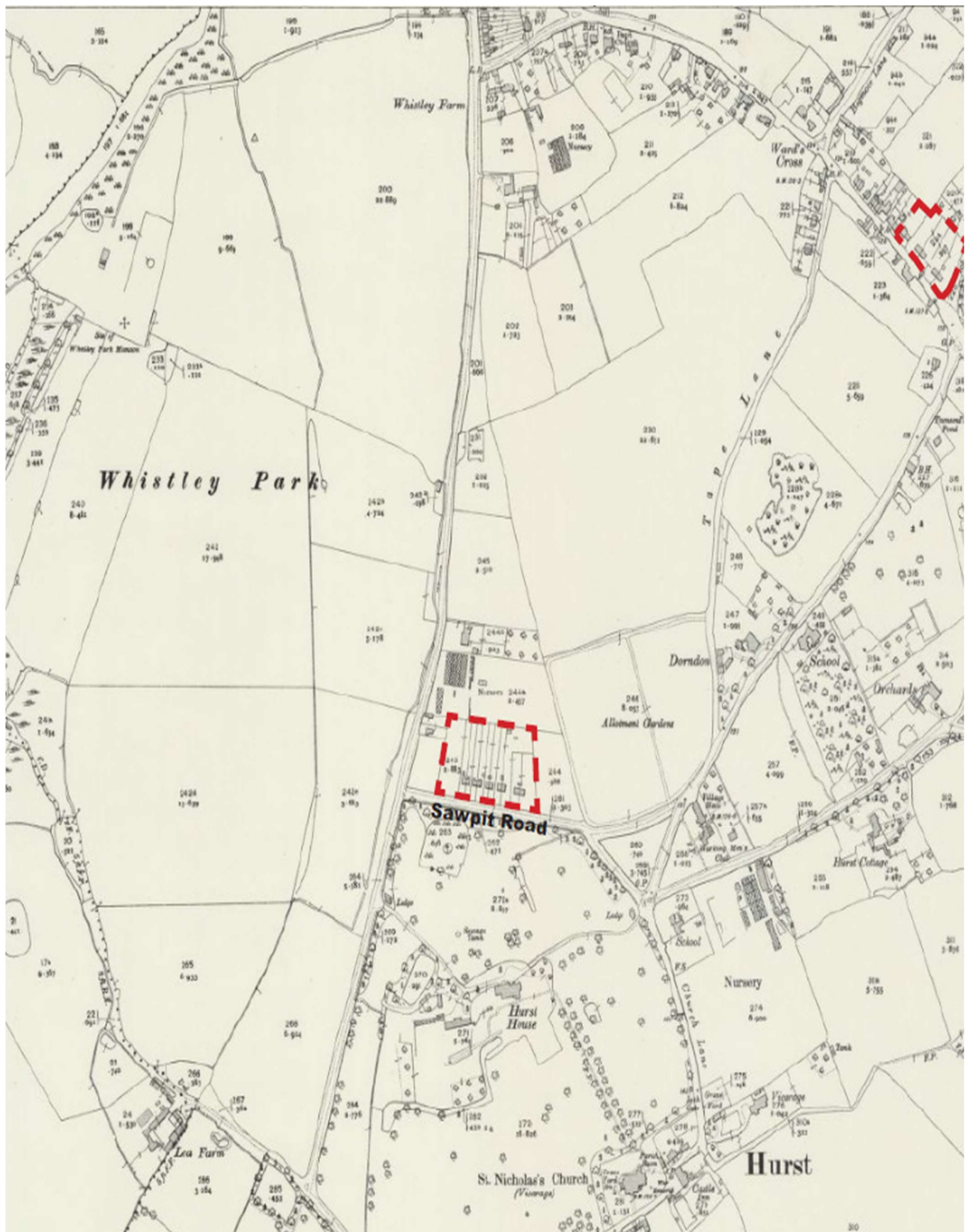
Appendix 2

Hurst – Historic Maps



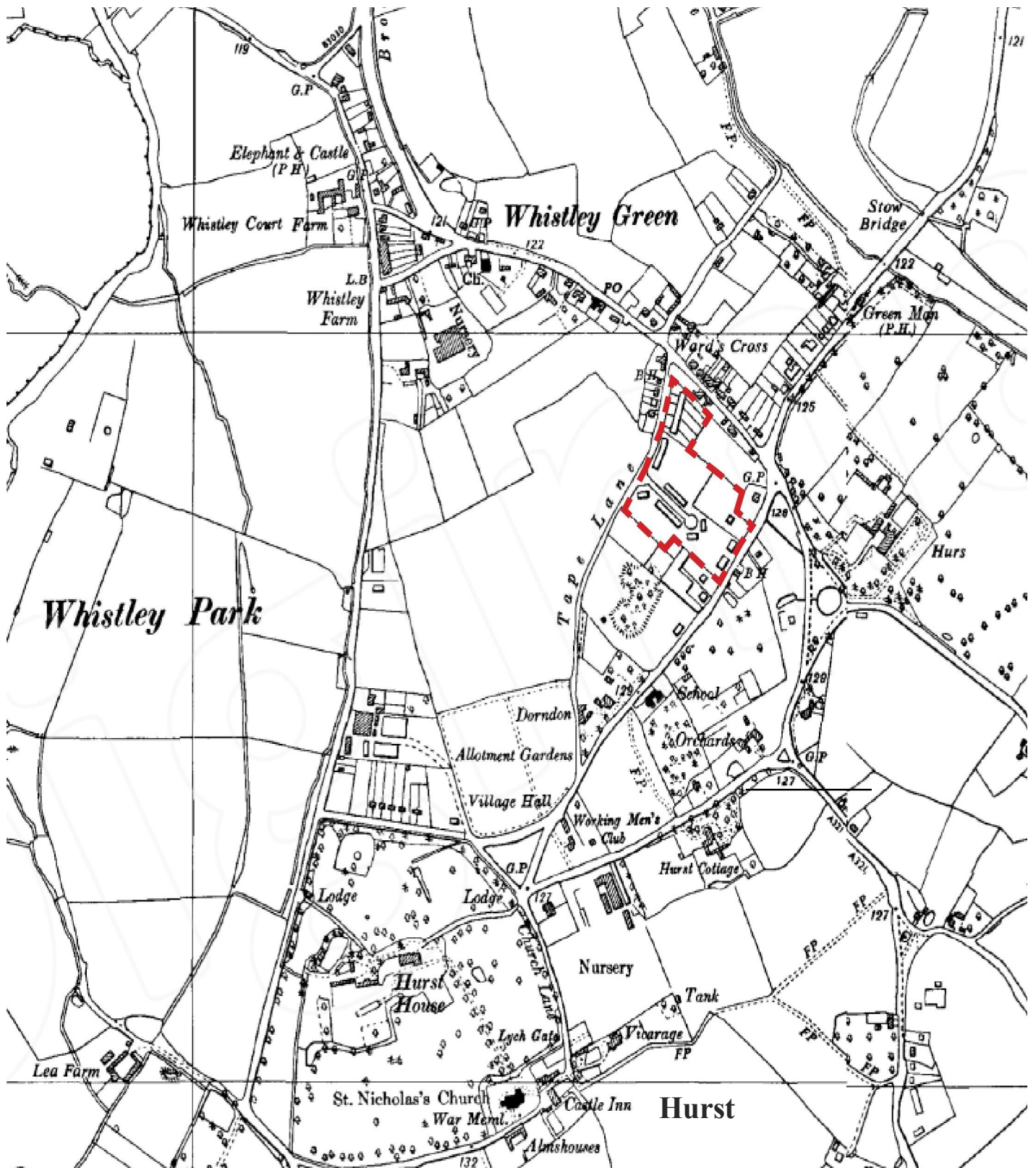
1912 Historic Map

- Organic network of roads and lanes following field boundaries.
- St Nicholas's Church, Castle Inn and vicarage to south.
- Hurst House set in extensive parkland south of Sawpit Road.
- Two schools and a working man's club.
- Whistley Park to west.
- Small settlements of Ward's Cross and Whistley Green to the north almost linked by development fronting Broadwater Lane.
- Allotment gardens, nurseries, orchards and agricultural fields.



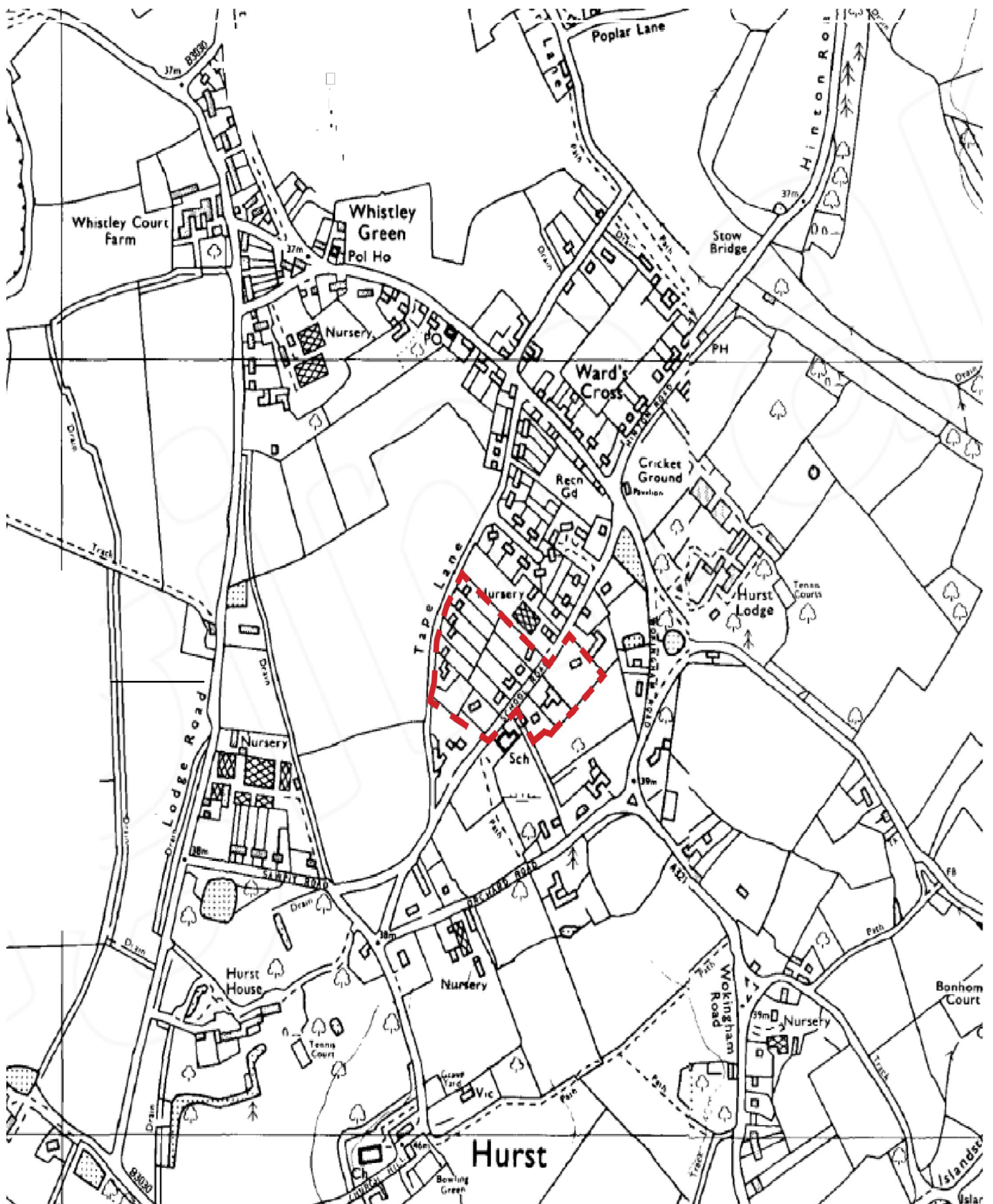
1933 Historic Map

- New semi-detached homes fronting Sawpit Road and School Road
- New village hall next to working man's club.



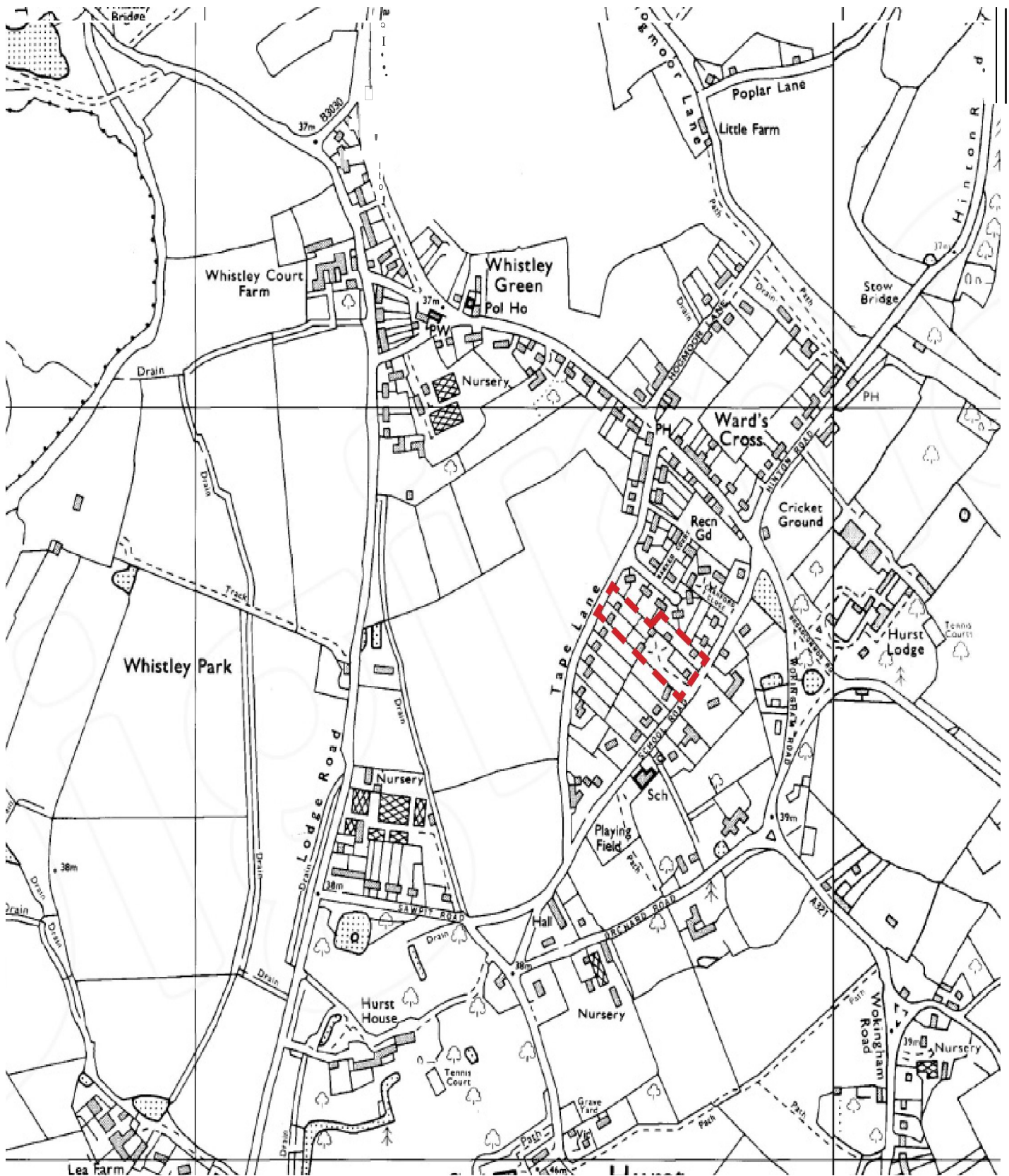
1960s Historic Map

- New homes between Tape Lane and School Road – some street fronting and others on a cul-de-sac.



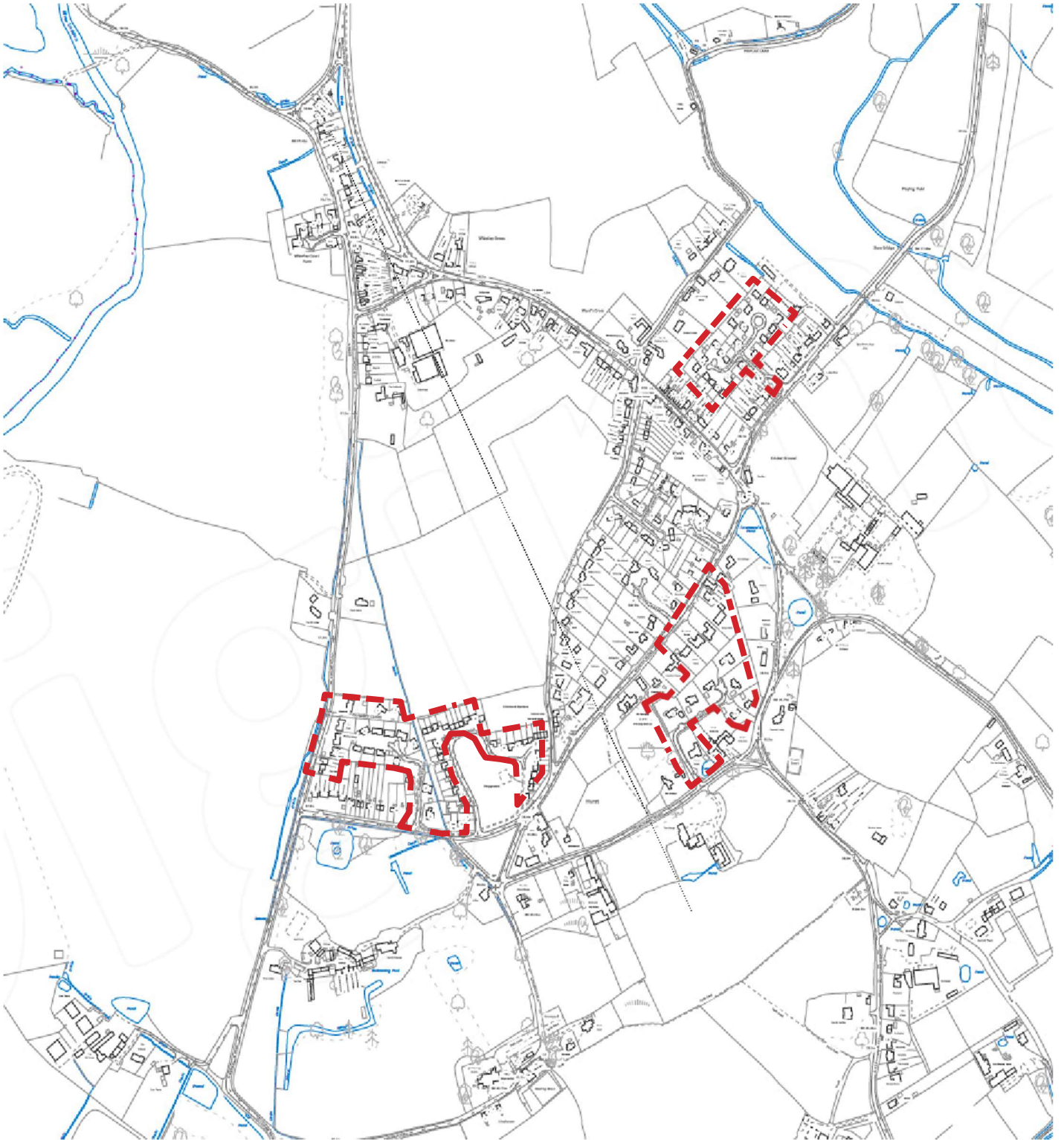
1970s Historic Map

- Gaps in development on Broadwater Lane between Ward's Cross and Whistley Green filled in linking settlements together.
- New homes fronting Tape Lane and on both sides of School Road.



1980s Historic Map

- Nursery between Tape Lane and School Road replaced with street fronting houses and a cul-de-sac.
- Second small cul-de-sac added to north replacing an older building.
- Recreation ground and cricket ground noted.



2005 Historic Map

- Significantly more development in four larger parcels.
- Mainly in the form of culs-de-sac but some new street fronting houses on School Road replacing older buildings.
- Barber Close and Martineau Lane culs-de-sac on adjacent sites have a mix of detached, semi-detached and terraced houses.
- Martineau Lane includes a 'village green' with play area.
- Dalby Close cul-de-sac of detached and some semi-detached houses infills land behind existing street frontage in Ward's Cross accessed from Hinton Road.
- Orchard Chase cul-de-sac of 4 & 5 bedroom detached houses is accessed from Orchard Road and adjoins site of large new detached homes facing School Road.