

19 September, 2024 –

To: development.control@wokingham.gov.uk (email)

From: Mrs B L Robinson, Rosebank, Tape Lane, Hurst, RG10 0DP

Planning Application 242067 – Land between Lodge Road and Tape Lane, Hurst, RG10 0EG

Outline application for the proposed erection of up to 99 no. dwellings, green infrastructure, open space, pedestrian and cycle links, recreational facilities and other associated infrastructure and access points on Lodge Road and Tape Lane with required improvements. (All matters reserved except for means of access.)

This objection is from me personally and does not and should not represent the views of the other members of the same household, who will, should they choose, make their own representations which should be dealt with by WBC separately and independently.



Image 1: Tranquil dawn on the proposed greenfield site

I OBJECT TO THIS APPLICATION for the following reasons:

This objection has been submitted on 19th September, after WBC held the Council Meeting to Propose the WBC LPU 2023 -2040 (Proposed Submission Plan Consultation and Submission which was UPHELD. Therefore Regulation 19 Consultation will be held.

The location is not within the development limit for Hurst and therefore is contrary to current WBC Core Strategy Policy CP11. Neither does it fulfil any of the current national and local policy exception requirements.

This site was assessed in the most recent WBC proposed revised Local Plan Update HELAA as 'Unsuitable' for development. Contrary to the applicants Planning Statement the WBC LPU Regulation 19 Consultation has now been published and this confirms that the proposed site has not been allocated in the Emerging Local Plan which dates from **1 April 2023 to 31 March 2040**.

As with the current development plan, the LPU Proposed Submission Plan proposes the majority of new land for development is concentrated into strategic scale developments, which will provide the best opportunity to delivery sustainable communities with lower environmental and climate impact. THE VERY REASON WHY THIS SITE WAS NOT ALLOCATED AND HAS BEEN DISMISSED BY MANY OTHER APPEAL INSPECTORS AND WBC IS THAT HURST IS NOT A SUSTAINABLE LOCATION and does not fulfil this requisite for the new LPU.

The selection of land for development, if proven to be required, should be assessed fully through the process of the current Local Plan, the emerging local plan or the emerging Hurst neighbourhood plan, not dictated

through speculative landowners/developers such as MACMIC attempting to destroy the character of this village and the countryside. This is a greenfield site: Current National planning policy states that development should be prioritised on brownfield sites.

Yet again, as with the previous application (220458) which was dismissed at appeal in March 2023 (APPEAL APP/X0360/W/22/3309202), the proposal makes no attempt to fit with the organic growth of either the historic settlement of Whistley Green or the historic settlement of the village of Hurst/Wards Cross. What it does, is add 2 large, inappropriate, carbuncles (which the Planning Statement describe as 'clusters') of approximately 50 dwellings each on to a greenfield site, which would significantly erode the limited remaining gap between these historic villages to the extent that they would coalesce. The proposed 'illustrative' green gap in the guise of a 'Common' is not guaranteed for perpetuity, does not prevent or protect the rural coalescence between Whistley Green and Hurst settlements.

If allowed, this proposal would be a poor transition into the countryside as the scale and density is wholly inappropriate and is in conflict with WBC CS Policy CP9. It does not respect the transition between the built up area and the open countryside, by taking account the character of the adjacent countryside and landscape and is in conflict with WBC MDD Policy CC02. This rural green gap has been continuously under attack from developers and the landowners for decades and on each and every occasion either at LPA level, through planning inspectors at the numerous appeals, to the Secretary of State, this important local area of land has been regarded as an essential contribution to the character and landscape of Hurst and Whistley Green.

It is in conflict with CS Policy CP17 which sets out that sites to be identified in Limited Development Locations should generally not exceed 25 dwellings, having account of the limited nature of services and facilities within that location, including the limited capacity of the local primary school.

The Applicants statement is completely at odds with the findings of WBC and numerous planning inspectors (including the most recent dismissed Appeal on this very site) who have confirmed that Hurst only has a 'basic' range of services and facilities and the residents are overly reliant on the motor car to access better facilities further afield. There is only a very small convenience store, a part-time sub post office, a few pubs, a Church and a village hall.

The primary school will not be able to accommodate the children from the proposed estates, neither will the pre-school. There is no secondary school within acceptable walking distance or safe cycling distance; It is acknowledged by the current residents that Hurst pupils struggle to attain their first choice of secondary school and this is set to get harder with the increased developments in Twyford and Wokingham as those pupils, being nearer to the schools will take priority. The secondary school age children in Hurst do not have the benefit of assurance that that they will continue their education at the same schools as their peers/friends as there is not sufficient capacity or choice to accommodate this; The addition of 99 new dwellings will only make this situation worse and is contrary to NPPF which states there should be sufficient choice of school places available to meet the needs of existing and new communities.

This proposal contains dangerous and divisive community inducements:

The purely 'illustrative' inducements are just that '*illustrative*'. As MacMic no longer build developments, if this outline proposal is permitted, they will sell this on to a developer who will do their level best to achieve the greatest profit margin and in doing so, will find the more costly illustrative 'inducements', that are wholly reliant on third party negotiations, contributions and authorities, will not be viable and therefore unachievable.

In an effort to overcome the lack of sustainability for the proposed development of 99 dwellings, with at least 250 extra residents and their 250 cars (WBC has one of the highest car ownership rates in the country and Hurst, being unsustainable has even more) the applicant tenuously proposes:

- 1) An 'illustrative' introduction of a 16 seater minibus for a couple of hours in the morning and a few more hours in the afternoon, in the expectation that this will change the over reliance on the motor car, not only for the new residents, but also the existing residents – IT WON'T!
- 2) There are now approximately 440 dwellings in Hurst Village, with about 800 – 900 residents (This number was quoted in the last Appeal for this site by WBC – I have included the recently built 4

dwelling at Sawpit Road, as these have added a further 18 bedrooms overall). This proposal will increase the number of dwellings in the village of Hurst and Whistley Green by approximately 23% and therefore exponentially, there will be an increase in population, all of whom could and should have access to the proposed 16 seater minibus which would be wholly inadequate to meet that requirement and therefore will make little difference to the amount of car usage.

- 3) This proposed service will be costly to the new residents (especially those who don't have children who go to Wargrave Piggot or won't use the service) as 45% of the running costs will be derived from the service/management charges proposed on each and every new dwelling of this proposal. This is in addition to the management and service charges for all the other proposed 'inducements' and the management of the proposed 'Common', allotments, car share management, SuDS etc. All of which will raise annually to cover the increasing management costs.
- 4) This is an ill-conceived, and a divisive scheme, which serves to benefit so very few residents as to be of inconsequence, certainly not enough to override the harm that this inappropriate major development will bring. The list of controversy and unfairness between the new residents and existing residents, is endless. Anyone can see that this is not a realistic inducement, it is fraught with difficulties and logistical problems and is purely paying lip service in a poor effort to overcome the reality that Hurst is an unsustainable location.
- 5) Then there is the suggested rerouting of the existing 128/129 bus route through the new housing estate and exit in Tape Lane.
 - The RSA confirms that the bus will definitely swing out across the proposed exit at the Northern end of Tape Lane to exit the development and therefore any parking by the residents will be dealt with by parking restrictions. This certainly won't benefit the existing residents.
 - What will the proposed new reroute of the 128/129 take? Looking at the options it would seem that to accommodate the entrance at Lodge Road Access, the bus would either have to do a far longer route to accommodate the existing stops, thereby lengthening the journey (this currently is one of the longest TVB routes they have) and disrupting it for those further along the route, or it will necessitate the removal of the existing route through the village, almost certainly that along School Road. That is clearly a disbenefit to the existing residents.
 - What will stop the housing estate vehicles from using the proposed bus exit into Tape Lane? Broad Hinton has tried this, but fails as many SUV vehicles, trucks and vans are able to negotiate the road humps that were installed to prevent vehicles other than the bus accessing the route. All this will do is introduce yet more traffic and danger on to this Lane.
- 6) The introduction of the illustrative minibus does not improve the bus routes to Winnersh, Wokingham or Binfield/Bracknell and therefore the residents will continue to have a poor and unreliable service to these centres and will be overly reliant on the motor car.
- 7) The illustrative minibus will purportedly only run until 7 pm, that is not convenient for most commuters returning from London or further afield. Neither does it allow for any residents to engage in any social activities beyond the village in the later afternoons or evenings.
- 8) Even with the introduction of the minibus, there still won't be a bus service that runs every 30 minutes throughout the day and evening from and to Hurst from Twyford, Winnersh and Wokingham.
- 9) There still won't be provision for any bus service from Hurst on Sundays.
- 10) The dubious funding for the proposed minibus is only for 10 years – then what happens?

Overall the illustrative provision of the minibus will only be a very limited benefit to very few of the new residents (at a cost) and a DISBENEFIT for the existing residents due to it being an unequitable, ill-conceived scheme which will not solve or reduce the over-reliance of the residents of the 99 dwellings or the existing residents on the motorcar to access services further afield.

The rerouting of the 128/129 is a **DISBENEFIT** as it will reduce the service to the existing residents.

Having spent quite a while cycling around Belgium recently, where they have cycle lanes and cyclists are catered have priority over and above every other form of transport, including pedestrians, I can see how properly introduced cycle lane network works – by comparison, the scheme proposed, having looked at the Road Safety Audit (RSA), is worryingly dangerous and lures the inexperienced cyclist on to busy main roads and a wider network of unlit roads with no cycle lanes at all.

- The roads going to Twyford are not wide enough to accommodate (and this has been acknowledged by the RSA) for continuous, designated, legal, cycle lanes, so they have suggested that 'Advisory' cycle lanes be introduced – however the caveat is that even these 'Advisory' cycle lanes cannot be continuous, due to the inadequate width of the A321, the cyclists will be advised to go on to and off the proposed 'shared surface footway (pavement)' between Hurst and Twyford.
- 'Advisory' cycle ways are not legally enforceable; Buses, large vehicles including large lorries and wide tractors (and despite the applicants very limited traffic survey reporting there aren't that many large vehicles along the A321 – there are enough to put off all but the most confident cyclists) are allowed to and will use the advisory cycle lanes to drive in.
- Advisory cycle lanes can still have cars legally parked in them – this in itself presents a danger.
- The number of entrances to residences is considerable along the proposed element of 'shared surface route' between Hurst and Twyford and all of these will have cars turning into and coming out of their driveways. Despite the proposal to put add lines etc the inevitable will happen and a cyclist will either have to swerve to miss a car and go into the A321 and collide with a vehicle, or there will, as predicted by the RSA, have a collision with a car driving in and out of their driveway. This is not a safe option for either pedestrians or cyclists and contrary to NPPF.
- What the RSA has not taken into account is in the Autum/Winter/Spring, when the sun is low, many vehicles are blinded momentarily as they drive along the A321. It is even worse when it has been raining and the sun is reflected off the wet road. This is an added danger to cyclists who will perceive they are safe on the Advisory cycle lanes.
- The RSA has not acknowledged that the A321 floods along Broadwater Lane frequently and this also causes dangerous traffic conditions. As the area is now determined by WBC S19 Flood Report that there is a 1 in 3 year flood event, it confirms, what all local residents know, that this is a frequent event. Of course the introduction of a further 99 dwellings will only serve to exacerbate that.
- The roads in Hurst are unlit until you reach Broad Hinton.

Overall, the indicative cycle routes in the proposed development only lead to unsafe, unlit networks; There are no improvements to routes to Wokingham (A321), Binfield (A321/Forest Road), Winnersh (B3030) or Woodley which will remain treacherous. The applicant is even suggesting that you can ride across the Ford (Whistley Mill Lane) towards Waingels College, which rises quickly and is inaccessible for much of the winter months; Or ride along muddy tracks, which also flood along the Loddon; Or along Sandford Lane to Woodley, which is a notorious, flood ridden, narrow, twisty, rat run that is closed almost as much as it is open between October to May.

It is evident that as usual, the report/assessment prepared by i-Transport, which all the developers rely on, is a flawed desk exercise and once again, I-Transport clearly do not understand, have not experienced, the lived experiences of cycling in and around this area and perceive that a proposal which proposes a small amount of unenforceable 'tweaking' is acceptable and safe and makes the site more sustainable – **it doesn't.**

The inevitable introduction of yet further development in and around the area (including Binfield, Charvil, Twyford, Wokingham and Winnersh, means the traffic along the A321 will continue to increase exponentially. The RSA quoted a figure of over 7,000 vehicle moments on an average day along the A321, in reality as the government demands that WBC build an additional 12763 (or it would well be 20,000 more dwellings under the new NPPF) dwellings over the next 15 years and it won't be long before this increases to well over 10,000 vehicle per day.

The illustrative introduction of the cycle lanes/routes will encourage cyclists on to a network they believe will be safe, when in fact it will be the opposite and will get progressively worse as development in the area increases. Would I ride or encourage children to cycle along these adapted routes? Absolutely not!

Unachievable 'Illustrative' Inducements:

Lockers: The proposed lockers aren't of any great benefit. At the moment the Post Office and Village Shop offer this facility.

The proposed build outs and widening of footways to the village shop, making the village high street a one way street at a time, will only encourage more traffic along (Access Only) Tape Lane as drivers will want to avoid the wait as the streaming traffic from the opposite end will cause issues. This would make the narrow, rural Tape Lane a rat run which would be dangerous for pedestrians, cyclists, horse riders as most of this lane is a shared surface with vehicles. **Therefore a DISBENEFIT** to the existing residents.

The build outs will also necessitate reduced parking and/or difficulty to access parking for the residents along The Street and discourage use of the Village Shop from passing trade, as cars will no longer be able to park alongside the entrance and entering/exiting from the car park will even more difficult than it is now. Another **DISBENEFIT** for the existing residents.

Access into the proposed indicative 'Common'. There is no indication that the illustrative 'Common' will be registered as 'Common Land' and therefore no guarantee it would delivered or remain as such in perpetuity. As hundreds of existing residents have testified in the previous application/appeal and again this time round, Hurst and Whistley Green settlements would like to retain the historic character, rural landscape, this tranquil green field with grazing ponies and dark sky that has served as a backdrop since the Domesday, which is enjoyed by many as they walk to and from the village hall and schools. The proposed illustrative urban 'Common' will not be in keeping with the rural character; The quiet and tranquility will be lost as not only will the quietly grazing ponies disappear, the wildlife that we all enjoy, which includes, [REDACTED] foxes, deer, hedgehogs, owls, wetland birds, butterflies and bats to name but a few, will also disappear; only to be replaced with 99 dwellings with their 250 residents, street lighting, back garden lighting, board fences, noise and domestic pets and general suburban influences. The proposed, artificially, manufactured 'Common', managed within an inch of it's suburban life, and loss of rural landscape character is a **DISBENEFIT** to the existing residents of Hurst.

Hurst residents already enjoy a 3 acre Village Green, a recreation ground, village ponds, ample play grounds for small children, plenty of public footpaths, with views across fields (not urban estates like this). There is nothing in the proposed inducements that Hurst residents need or want. At no point have the residents suggested that they would like public access to this field, only that it should be protected from development.

The proposed 3 accesses and associated visibility splays on Tape Lane will leave wide gaping holes where there were once old hedgerows with wild brambles, honeysuckle and dog rose where the hedge sparrows, Gold Finches and Blue Tits forage and make their habitat.

It is clearly evident from the flawed LVIA and photo montages (which incidentally did not show the 3 access points in Tape Lane) the densely packed dwellings will dominate the landscape views from Tape Lane and Broadwater Lane. The loss of hedgerows, habitat and visual amenity is a significant harm and a **DISBENEFIT**.

The view from Lodge Road, will not be that of a verdant country road, but once the wide access and associated visibility splays have removed the existing hedgerow and wildlife ditches that run along the site, even with the proposed replacement hedging (set further back, which will take years to mature) the 99 dwellings will be highly visible as you walk along the permissive path along Lodge Road.

The rural landscape and the inverted 'C' between Whistley Green and Hurst that has stood unchanged for centuries, will disappear and so this is a significant harm and a **DISBENEFIT**.

Proposed Orchard and Allotments: Hurst residents already have access to allotments and a lovely orchard with stunning views (next to a pub, which is even better). The proposal of further allotments and orchard are only for the benefit of the new residents, they are not a benefit for the existing residents. Neither are they a benefit or protection for the wildlife as all areas will be overrun with human and domestic pet interaction. Hurst residents do not need or want additional orchards or allotments – it's a poor exchange for the decimation of a wildlife habitat and rural and historic landscape – so another significant harm and **DISBENEFIT** as far as I am concerned.

Loss of Biodiversity and flawed ecology report:

The ecology survey and report do not follow the 'Good Practice Principles for BNG' set out by the IEMA, CIEEM and CIRIA. Outline planning on this scale, with a flawed survey cannot possibly, realistically, and accurately identify gain or loss of Biodiversity. Ecology and BNG calculations are required to take into account the state of the site prior to any work that that have occurred which would change the Metric – they haven't done this.

- The Ecology reports were, by their own admission, rushed and incomplete. The BNG inaccurately measures the loss of hedgerow making it to be far less than it will be and it has not taken into account the offsite harm from the removal of hedgerow and trees to accommodate the proposal of a footway at the southern end of Tape Lane.
- The Ecology Report and BNG metric does not take into account the removal of two large oak trees prior to the previous application (dismissed at Appeal) as this is the only way that application and this application could have viable access from Lodge Road.
- Neither does the Ecology Report account for the decimation to the field where the entrance from Lodge Road is to reduce the value of the Biodiversity; this was not only done prior to the previous application but has been repeated prior to this application.
- The BNG does not acknowledge, take into account the disruption and resowing after an extensive number of Archaeological trenches were dug prior to the previous application.
- The BNG and Ecology Report has no regard that this site is a valued local wildlife corridor adjacent to DEFRA National Nature Recovery Network Enhancement Zone 1 and quite rightly this site is within the designated DEFRA Habitat Network Expansion Zone as it clearly contributes as an important wildlife and habitat corridor between Haines Hill BOA and Loddon Gravel Pits BOA and the Nature Recovery Network Zones.
- The proposal purports to increase the biodiversity, but in reality, [REDACTED], hedgehogs, deer, owls, bats, Great Crested Newts, foxes and birds will not benefit from the 99 dwellings, 250 cars and associated service vehicles driving in and out of the site; Interaction with 250 people with their domestic pets, hardscaping, external lighting – which is contrary to the Principles of enhancing habitat. The proposal does not avoid this impact and the mitigation proposed is far from adequate. Once again our declining, depleted and valued biodiversity habitat is threatened and discarded.
- This application is contrary to WBC Biodiversity Action Plan (2014)¹ para 1.2.1 states which specifically states:

Towns and villages can contain other habitats covered elsewhere in the Wokingham Borough Biodiversity Action Plan. As the demand for housing continues, increasing amounts of the Boroughs wildlife habitats will fall within the boundaries of residential areas. It is increasingly important to make the links between biodiversity areas in villages and towns and the surrounding countryside.

Exacerbation of Drainage and Flooding Risk to the Wider Area

With the recently published WBC DRAFT S19 Flood Investigation for Hurst (which the applicant's flawed FRA and Drainage Report does not take into account), there is no doubt that the introduction of 99 dwellings, in a field that has a high water table and frequent surface water flooding, the tenuous SuDS and unachievable drainage plan proposed, will exacerbate and increase flood risk in Hurst, this is contrary to the NPPF.

Flood risk in Hurst is **now accepted by WBC as a 1 in 3 year event** (not 1 in 30 or 1 in 100), and foul drainage will also overwhelm the 'woefully inadequate' combined foul water drainage system as the pumping station doesn't cope with the existing residents, let alone a further 99 dwellings. This will inevitably cause damage to local Heritage Assets along the A321 and continue to flood the Heritage Asset along Hogmoor/Poplar Lane; It

¹ WBC Biodiversity Action Plan 2014 <https://www.wokingham.gov.uk/resources/assets/attachment/full/0/414550.pdf>

will also cause further flooding on the A321, causing traffic chaos at best and danger to pedestrians and drivers at worse.

In addition to the above, the Thames Water Wastewater Network Assessment Headroom Concern report for the Emerging WBC LPU identified that the areas with the least capacity for future growth included Twyford south of the Railway line and Hurst. As Twyford has recently been given permission for a further 200 dwellings (Bridge Farm) that will use the very same Wastewater facility as Hurst (Bowsey Hill) the headroom concern must now be increased from 'High' to 'Very High'.

The site is within 10 metres of Whistley Court and Lea Farm Landfill Site which generates an additional 80 cubic metres of toxic leachate per day that enters the wastewater drainage network in Lodge Road – the very same network that has the least capacity for future growth, it beggars belief that the FRA and SuDS have not taken this concerning issue into consideration, as the flood risk and combination of toxic leachate is a very real hazard for the community and habitat.

This is yet **another** harmful **DISBENEFIT to the existing residents and the quality of life for existing residents in Hurst.**

To conclude, there is nothing in this new planning application, which overrides the reasons for refusal and subsequent dismissal at appeal for the same site in March 2023. The indicative inducements that propose to mitigate the acknowledged substantial harm, the unsustainability (ie the residents will still be over reliant on the motor car), the loss of habitat, the intrinsic landscape value and historic character are unrealistic and unachievable.

This is a 'rushed' flawed, speculative application submitted in the wake of the recently dismissed appeal decision, which robustly stated that this was not a good site for major development such as this. It is a desperate to attempt to attain planning permission before WBC have their new local plan adopted and have the requisite housing targets in place.

The poorly devised benefits do not demonstrably outweigh the significant harms on Hurst and Whistley Green.

On the basis of the above reasons, I ask WBC to immediately REFUSE this application.