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22nd January 2022

**Growth and Delivery Team,
Revised Growth Strategy Consultation,
Wokingham Borough Council,
Shute End,
Wokingham RG10 1BN.**

Dear Sir/Madam

Re; Wokingham Borough Council Draft Local Plan Update Revised Growth Strategy, Site 5HU030, Land Northwest of Hogmoor Lane, Hurst (12 dwellings); Site 5HU002, Land Next to Whistley Green Cottage, Hurst (3 dwellings); Site 5HU0006, Land North of Orchard Road, Hurst (16 dwellings)

I would refer you to previous correspondence from The Hurst Village Society (HVS) in relation to these sites, dated 10th June 2021 and addressed to The Planning Policy Manager. Also relevant is the response to that letter from Mr Ian Church, Team Manager – Growth and Delivery, dated 7th July 2021.

As you will see from that letter, HVS was concerned that “there is compelling evidence to show that the methodology used in the Council’s Housing and Economic Land Availability Assessment (HELAA) and Sustainability Appraisal regarding Site HU030 was unsound and in addition and what is most disconcerting to the Society is that material planning considerations that should have properly been considered as part of the process in evaluating the

site as a suitable option, or not, for development appear to have been omitted or disregarded. This highlights what appears to be a major inconsistency in the identification of sites for future development for inclusion in The Local Plan as this site shares many similar key characteristics with some other sites in the centre of the village which have not been included.” Our letter then included a precis of highly relevant information which we believed had inexplicably been omitted or ignored as a result of which HVS formally requested Wokingham Borough Council (WBC), in the light of this information, to reassess the future inclusion of site 5HU030 as part of the ongoing consultation process of the The Local Plan. The Society is aware individual local residents have raised these concerns with you, and following them and The Society raising this matter with Hurst Parish Council, they too wrote to you expressing their concerns about omissions in the HELAA (reference Hurst Parish Council letter, dated 4th August 2021).

In his response to HVS (7th July 2021) Ian Church said that “Work to prepare the next stage of the Local Plan Update is progressing, which will include the assessment of areas of land promoted for future development. An updated Housing and Economic Land Availability Assessment (HELAA) is therefore being prepared. As a result, information submitted as part of the consultation processes undertaken, alongside wider information, **including that raised in your letter**, will be taken into consideration as part of ongoing work. This will help to guide the next public consultation on the Local Plan Update” which as he correctly anticipated commenced late last year following the agreement of The Draft Local Plan Revised Growth Strategy by the WBC Executive at a meeting on Friday 12th November. The Public Consultation Period has been extended until 24th January 2022, and this letter should be considered as part of that process.

Before commenting on the two sites, 5HU030 and 5HU002 individually, HVS, whilst recognizing that the two sites share some characteristics, cannot understand the rationale for them having been combined as one site for the purpose of the Local Plan Update under the heading “5HU002 Group”. They are not contiguous in the true sense of the word in that they are separated by several dwellings. They are not in the same ownership, although it is accepted that in the Council’s view this is not a reason for necessarily preventing the grouping together of one or more sites. Importantly as has been confirmed by a Planning Inspector, Whistley Green Cottage and the adjacent field (site 5HU002) should be considered part of the settlement of Whistley Green. “The rear boundary along with those on either side, marks a consistent line and delineation from the open countryside beyond.” In contrast site 5HU030 is accepted as the land that separates the centre of the village of Hurst from the settlement of Whistley Green. Whilst both sites are outside the settlement boundary, development on site 5HU002 on it’s own could quite properly, having regard to the above, and therefore in terms of planning balance be considered as “infill”, and therefore allowed (which would be supported by HVS) whereas the



development of the larger site 5HU030 would have far greater negative physical and visual impact making it in The Society's view unsuitable for development.

Hurst Village Society (HVS) objects to the ongoing inclusion of site 5HU030 as suitable for development in the emerging Local Plan Update. Whilst the Society accepts that certain aspects of the HELAA assessment have been updated and revised it believes that many of the omissions and flaws in the methodology used in assessing this site as suitable for development and highlighted in our previous letter have still not been properly addressed. In The Society's opinion the revised HELAA assessment contradicts many national and local planning policies in respect of the rural landscape, green routes, woodland issues particularly in relation to mature veteran oaks, and preventing harm to heritage assets in an Area of Special Character. The HELAA assessment also gives scant regard to actual events that have taken place, such as the major flooding incidents that occurred along the A321, which borders the site, in 2014 and 2021 and fails to acknowledge any risk of additional flooding as a result of potentially building any additional houses. National and Local Planning Policies identify achieving a safe and accessible access as one of the most significant considerations when assessing a site for development and even the HELAA assessment accepts that "significant improvement work would be required to create access" whilst also accepting that there is no footpath to the village from the site side of Broadwater Lane and that the existence of the protected trees "will cause problems". Even if any potential solutions such as a pedestrian crossing were to be considered, this would require street lighting and road markings creating an unnecessary urbanising effect on one of the major approaches to the centre of Hurst, and in an Area of Special Character.

The Planning Process has to be both transparent and consistent, and the assessment methodology applied to this site that has led to its recommendation for future development in The Local Plan Update when looked at both in its own right, and in

comparison with the results of the same assessment methodology applied to other sites in Hurst leading to them not being recommended for development is mystifying, and puts that simple statement into jeopardy.

As has already been stated HVS does not understand the need to combine site 5HU002 with Site 5HU030 and The Society would want to ensure that our comments in relation to the latter do not in any way adversely affect the ongoing inclusion of the former as a site that in it's own right we believe is suitable for development in the Draft Local Plan Update. Whilst site 5HU002 is relatively small being allocated for 3 dwellings HVS believe it is of sufficient size to be considered on it's own as part of The Local Plan Update. In addition the site does not in our opinion suffer from the same physical concerns and the adverse effect of material planning considerations against development as described above in relation to site 5HU030. The statements and comments made in the revised HELAA assessment, (and which, when considered in relation to the large portion of the combined site "5HU002 Group", are considered contradictory and in conflict with National and Local Planning Policies) can be seen to support potential development on site 5HU002 which should therefore be continued to be considered, in the Society's opinion, as suitable for development in The Local Plan Update.

HVS would also wish to take this opportunity to comment on Site 5HU006, Land North of Orchard Road, Hurst. This an ideal opportunity for The Society to promote this site for inclusion in The Local Plan Update as suitable for future development as an alternative to Site 5HU030 which we believe should be excluded.

Using the same HELAA methodology Site 5HU006 has been assessed as potentially suitable for development, but then is precluded from development in the Sustainability Appraisal by virtue that it "is potentially valuable open space (used annually for the Hurst Show)." The Society is aware that The Hurst Show has not been held on this site since June 2019 and permission to hold this or indeed any other community recreational event on this site will not be reinstated in the future. In a letter to HVS (referred to above) following the Society raising concerns as to the lack of consistency, and flaws in the methodology used, and the omission of relevant information and material planning considerations WBC responded that as the Planning Authority they would be reviewing the suitability of all sites promoted for development. Importantly they stated, " The review must look at all sites promoted, along with all representations received, other views and any change in circumstances." It is clear that The Growth and Delivery Team were informed of this change of status of Site 5HU006 and have failed to take account of up to date information in assessing this site, and so the decision to exclude the site as suitable for future development on the basis of this single issue is flawed. In the Society's opinion it would not be reasonable or acceptable to assess this site as a Local Green Space or as an Asset of Community Value as any such designation will not provide an additional local benefit to the community, in that it does not further the cultural, recreational or sporting interests of the local community, it has no historic



significance and does not provide a habitat to any protected or rare wildlife species and has little or no biodiversity value. In almost direct contrast to Site 5HU030, Site 5HU006 is adjacent to the current development limit and does not protrude into open countryside, is in Flood Zone 1 with low flood risk, situated close to village services (including the Village Hall and St Nicholas Primary School) with safe pedestrian access and could benefit from two vehicular access points on Orchard Road and School Road. It has the added benefit of being larger than Site 5HU030 with a larger potential allocation of 16 dwellings.

For the avoidance of doubt Hurst village Society is recommending that;

Site 5HU002 (3 dwellings) and Site 5HU006 (16 dwellings) be promoted as suitable for development in The Local Plan Update, and,

Site 5HU030 (12 dwellings) be excluded from The Local Plan Update as unsuitable for development.

HVS also supports the designation of Dinton Pastures as a Green Space in the Local Plan Update.

Hurst Village Society hopes these comments are helpful to The Growth and Delivery Team in the preparation of The Local Plan Update, and is grateful for the opportunity to have been able to take part in this Public Consultation process.

Yours faithfully,

John Osborne on behalf of The Hurst Village Society

