



E-Mail; Development.Control@wokingham.gov.uk

For the attention of the Case Officer; Planning Application; 220458

29th March 2022

Dear Sir/Madam,

Re; Land East of Lodge Road, Hurst RG10 0EH. Outline application for the proposed development of approximately 200 homes, open space, pedestrian and cycle links, recreational facilities (Use Class E) and other associated infrastructure and primary vehicular access via the existing Lodge Road gated access with required improvement (all matters reserved except for access).

Whilst as always Hurst Village Society (HVS) is grateful for the opportunity to comment on this application; for the avoidance of doubt, HVS is totally opposed to the proposed development as outlined in this application and wishes to register the most strenuous of objections to the proposals, and fully supports and endorses those objections submitted by The Hurst Parish Council and numerous other individual local residents. It is to be hoped that Wokingham Borough Council (WBC) acting in it's role as The Local Planning Authority recognises the strength of feeling in the local community in raising objections, based on material planning considerations, to these inappropriate and unacceptable development proposals and refuses this outline application.

HVS is aware that this is an outline planning application, and that it is therefore primarily to determine whether the development proposals, including the access

are acceptable in principle or not. However because of the lack of clarity and certainty in the application details eg “development of approximately 200 homes” and “primary vehicular access” (the use of the word “primary” could be interpreted as implying there may well be a “secondary” or even “tertiary” access) it is, HVS would suggest, very difficult for WBC to make any decision other than to refuse the application based on such uncertain information.

The quality, accuracy, reliability and relevance of much of the data included in the many documents supporting the application is questionable and therefore raises the question as to how much weight can properly be given to arguments put forward based on such information.

It is accepted that the Applicant did properly undertake a programme of community engagement as part of the pre-submission work for the planning application as outlined in the Statement of Community Involvement, and HVS, again quite properly, in our opinion, fully engaged in this process. However, because of perhaps “the speculative” nature of the original proposals, this process failed to attract a large, and therefore representative number of local residents, resulting in a very low response rate to questionnaires and other information gathering exercises, hence undermining the value, in terms of how representative of the views and aspirations of the local community, of such data, subsequently quoted in shaping and refining the development proposals included in the application. By way of contrast, two 2 hour Drop In sessions held under the banner “Say No to 200 Houses In Hurst” attracted 140 local residents eager to fully understand the details of the application and to raise their concerns against these development proposals.

HVS considers that the application does not comply with many of the National and Local Planning Policies against which the proposals have to be determined. The following detail gives a snapshot of the evidence available to support this statement. It is not accepted that this application satisfies the three objectives in Paragraph 8 of The National Planning Policy Framework (NPPF) eg Economic, Social, and Environmental as it fails to provide evidence as to how the proposals will “help to build a strong and competitive economy”, “support strong, vibrant and healthy communities” and “to protect and enhance our natural, built, and historic environment”. The application would appear to be in direct conflict with the Government’s statement that planning policies should aim to ensure that developments “Are sympathetic to local character and history, including the surrounding built environment and landscape setting”.

The proposed development is not within the Local Development Limit and WBC’s policy CP11 of the Core Strategy states very explicitly that “proposals outside of the Development Limit will not normally be permitted” unless by exception, specific conditions are met. These proposals do not meet any of these exceptions. As such



these proposals introduce an urbanised development onto a greenfield site in designated countryside, outside the development limit and should be refused on these grounds alone. HVS is of the opinion that this application conflicts with the current WBC Local Plan which remains in force until 2026 and NPPF guidance is clear that applications must be determined in accordance with the Local Plan and that those, such as this application, that conflict should be refused. The Draft Local Plan Update did not include this site in its list of sites suitable for development because it “would be inappropriate to the existing settlement form, pattern and character of the landscape”.

HVS has noted that the applicant has questioned the ability of WBC to meet its required deliverable housing supply over the next five years implying that many of the local planning policies, against which this application will be determined, will be out of date and therefore will carry little, or no weight. The local community will of course be beholden on WBC to strenuously refute this accusation in order to ensure proper weight can be given to all relevant policies with which this application conflicts.

The Supplementary Planning Document, A Design for Hurst, (which is a material consideration) and which outlines a variety of objectives for new residential development within the village, would also support the refusal of this application in that is very clear in Objective 5.1 – that open views and vistas need to be retained as far as possible, Objective 6.1 – consideration should be given to existing wildlife corridors, and where appropriate create new ones and 11.6 – the character and housing density of the surrounding area is an important factor in considering the impact of new development on its surroundings. The latter objective is particularly

relevant when even at this Outline Planning Stage the density of dwellings proposed is too large for a countryside location such as this and represents over development.

HVS strongly refutes the statement in the application “that there would be no adverse impact on the highway network of the proposals” and would suggest that the Transport Assessment underestimates the number of vehicles entering and leaving the site and does not appear to take into account tradesman and service vehicles. Clearly WBC’s Transport and Highways Engineers will examine and analyse all the figures quoted in the report in detail and make the necessary comparisons with relevant National data and computer models. Concerns over the proposed “primary vehicular access” were raised at the beginning of this letter but the design of the junction of the proposed access with Lodge Road; a ghost island/lane, is considered to be totally inadequate and potentially unsafe even after the provision of lengthy visibility splays along Lodge Road. The Society is concerned that contrary to what is said in The Transport Assessment the proposed provision of pedestrian routes and cycle ways within and across the site do not safely link to a wider network of safe routes for cyclists and pedestrians.

Contrary to the comments in The Flood Risk Assessment there is anecdotal local evidence to suggest that areas of this site regularly flood in times of excessive rainfall, and that the network of SuDS features including detention basins and swales will be insufficient to negate the risk of surface water flooding on or off site. The Thames Water sewerage pumping stations in Hurst are known to already be at full capacity as a result of which at times of heavy rainfall they can fail and the sewers can be overwhelmed resulting in flooding along Broadwater Lane and the wider area. Because there is a combined sewer system in the area, foul sewage from kitchens and toilets mixes with rainfall so that if sewers are overwhelmed, sewage can overflow from manholes and road gullies onto land and into rivers and in the worst cases, sewage can even flood homes. In terms of wastewater management Thames Water has rated Hurst as an area of High Concern with very limited capacity, and the current sewerage network requires more extensive upgrades/reinvestment and where any new development requires early engagement with them. Thames Water has calculated that the necessary remedial action to increase the capacity of the wastewater drainage system in Hurst would require a capital investment in the region of £25,000,000. The viability of the drainage system in Hurst is made worse as a result of the licence that is in place to allow 85 tons of toxic leachate per day from the Whistley Court and Lea Farm Landfill Site to enter the public wastewater drainage network in Lodge Road. It is hard to equate this information to the pre-planning confirmation of sufficient capacity by Thames Water based on information supplied to them by the applicant and HVS therefore believes it is imperative that The Planning Authority properly consults with Thames Water and The Environment Agency to ensure to the satisfaction of local residents



whether or not water management represents a serious impediment to any progress of this outline application. Nevertheless because of the very real risk, as has been shown by recent events, that the drainage network will be overwhelmed resulting in the potential flooding of existing residents homes this application cannot be seen to comply with the National Planning Policy Framework.

HVS is concerned that The Ecological Report fails to recognise the true biodiversity and ecological value of this site, and because of the close proximity to various Natural England projects it is hoped that they have been properly consulted on the proposals not least to confirm that any appropriate action has/will be initiated in order to properly identify any protected species, which inhabit the site or adjoining land.

HVS fully supports the concept of Planning Balance where it is applied correctly, but is not persuaded by the arguments put forward by the applicant under this heading in The Planning Statement. The economic, social, and environmental benefits associated with the development cannot be regarded as “significant” and therefore most definitely do not outweigh the harmful effects of the development, which in the Society’s opinion have either been grossly underestimated or omitted entirely and so the application should be refused.

Hurst Village Society hopes that these comments are helpful to the Planning Authority in their determination of this application.

Yours faithfully,

John Osborne, on behalf of The Hurst Village Society

