

and East of Lodge Road – Closing statement Friday 10<sup>th</sup> February 2023

I asked at the outset of this Inquiry what's changed to enable this development? This is what I have heard and what I have learnt:

1. I have learnt when it comes to planning Inquiries, don't ask cryptic questions and keep to the point! So I will try.
2. It's agreed the proposed development conflicts with the Local Plan.
3. We have all agreed that Wokingham has a 5 year Housing Land Supply shortfall, but only as a result of delivering too quickly.
4. We have all agreed that Wokingham are significantly ahead of their housing delivery plan. Maybe a slow start but all plans have a lead in, this Plan has had significant infrastructure improvements to accommodate delivery and the Plan now seems to be performing.
5. This doesn't mean that Wokingham can sit back on their laurels. When the plan is complete in 2026 Wokingham would have potentially exceeded their anticipated housing need by 18.7% (CD 1.6). The evidence seems to suggest this will happen and from a strategic Plan perspective it's a fantastic result.
6. In my 30 years of business, I have learnt delivery of goals is the best way of hitting targets, its more certain than simply setting up supply. The Government have woken up to this fact and the NPPF is soon likely to change to reflect this.
7. We heard that the economic benefits apply equally to any other development of 200 homes in Wokingham. The same applies to the social benefits and the environmental benefits can best be described as mitigation.

8. The question of how the harm to the village character caused by 4 new homes and the harm caused by 200 new homes compare has not been answered. I suspect this is because the fact is they are simply not comparable.
9. We have been told the Elizabeth Line makes Hurst a more sustainable Location, but then we heard in fact its actually the existing fast service that matters. Either way (GWR or TFL) the truth is the service has not changed for many years and has been well considered in Local Plans and past judgements.
10. I have learned what the Hurst bus timetable is, and its woefully inadequate for day to day needs and does not entice existing residents out of their cars. There is no proof that the residents of the new development will act any different to the current residents of Hurst, ie. we are all reliant on private motorized transport, although I don't know anyone with an e-bike.
11. I have learnt a new word – coalesce – I had to look it up [the Cambridge dictionary definition is – to join, to become one, the example given was - two lakes join, or, coalesce].  
Very romantic but the historic villages of Whistley Green and Hurst barely kiss, they certainly don't coalesce. If this development goes ahead, then they will definitely coalesce.
12. We have heard from Mr Friend on Landscape and Character that 200 homes will only cause moderate impact to the character of Hurst and Whistley Green. The village has grown steadily over the years with a controlled modest development in small numbers that have been considered modest harm, so the shock of 200 homes can only cause significant harm.
13. We looked a number of “indicative” verified wire frame views from the LVIA, the developer chose not to present indicative actual views, which may of, or may have not helped their case?  
The fact is they are all based on ground levels that are not fixed and houses that have not been designed. Only the methodology is verified, the views themselves are likely to change and can only get worse once levels rise.

There is no dispute the wire frames have been created scientifically and accurately, but it's not clear what they represent, it can all change. How can you have indicative evidence ? "It may look a bit like this – but then again it may not" !

14. We heard from Pell Frischmann that flood modelling on Hatchgate Ditch could be dealt with by condition as the development of 200 new homes didn't warrant the upfront time and expenditure without the certainty of a planning consent.

In the same evidence we heard Pell Frischmann state if there was a problem offsite site levels on site would not need to change, swales would just get wider, or, the highways would flood (only onsite Highways it was clarified). In my experience water runs downhill and when it breaks the bank of a river, a swale, a balancing pond, or even a kerb, who knows where it's going. The work has simply not been done, so what happens when this work is undertaken prior to development and it turns out this is a significant problem with flooding but planning permission has been granted?

The problem will undoubtedly be resolved but the solution will also undoubtedly change evidence that has been presented to the Inquiry. The Levels have a significant impact on the LVIA and connections to Tape Lane.

15. We heard from Pell Frischmann how the surface water ponding on the site was due to impermeable soil conditions and the ground saturated with water in heavy rain fall but this is not a problem swales could be lined to stop them filling up with this ground water. There is always a solution.

The Motion Drainage Strategy states the swales would be built in accordance with CIRIA 763 which requires a fall of 0.5% for impermeable swales (permeable swale not being feasible due to ground water saturation in heavy rainfall).

Working back from the proposed outfall in the south near the allotments, over the full site length of Tape Lane adjacent to the site (c.320 meters along Tape Lane) the ground levels could need to be raised by as much as 1,6m to the bottom of the last swale/ balancing pond, or, permeable paving to meet this design performance. In addition, there will be formation of 400-600mm for the banks for swales and c.580mm for permeable paving make up (Motion Drainage Strategy). So whilst the drainage can technically work, levels will be affected and

this does have a significant impact on the character and appearance of the new development along Tape Lane.

16. We have heard how the property management company of the new development will maintain these ditches. I have heard nothing about how the developer will secure the rights of access for maintenance and rights of connection for discharge to the Southern ditch, which is entirely on private land and for they have no rights to maintain or connect. Ownership dictates no riparian rights exist on this ditch, they are private and agreements will be required.
17. The drainage strategy agreed with WBC is on the basis that its "imperative" that connections are made to the "water courses" to the West (Hatchgate Ditch) and the Southern ditch and these are maintained for free flow. Well one is not a water course and not available for connection.

So back to my original question – What's changed ?

My conclusion is that nothing has really changed in the context of this site being suitable for sustainable development. However, along the way Wokingham have created a Local Plan and that Plan seems to be working better than expected when it comes to housing delivery.

The application is a Reserved Matters application, but there seem to be many material questions unanswered when it comes to delivery, much has been kicked down the line to be resolved later. A little bit of extra work would have put many of these questions to bed and I question with these shifting sands how can a true opinion be formed on the impact of the development of the site? Too much remains unresolved and in my mind delivery within the parameters presented to this Inquiry have not been demonstrated.

This is not an "Outline application for 200 houses....." – but rather a " It will be alright on the night application for 200 houses.....".

The current Local Plan was agreed through a democratic process, as will the new emerging local plan, it's been historically recognized that this site in Hurst is not a sustainable development location and it isn't sustainable today.

Its clear that 200 houses will cause significant harm to the character and setting of the village, how can it not. This harm is specific to this site while the benefits are not.

The Local Plan is working for housing delivery and the and there has been no evidence to suggest this will change. Plans are made for a reason, and on the basis it's not failing we need to stick to this one.

I would therefore respectfully request this Appeal is dismissed.

## **Dr Gemma Moore, Closing Statement**

Thank you for the opportunity to reflect on what I have heard presented, evidenced and discussed during the Appeal. Over the last eight days we have heard competing and conflicting views about the proposed development, and what impact it will have on Hurst, and beyond. These viewpoints depend upon experiences and positions. I would like to share two key reflections in my closing statement, drawn from my position as both a resident (who has lived in Hurst since 2014) and an Associate Professor at UCL (who helps those working in planning, development and policy to create places that will support health today and for future generations).

### **1. Fragility**

The Appeal has confirmed that Hurst and Whistley Green are locations that fall short on any definition or example of 'sustainability'. Instead, the evidence we have heard demonstrates the fragility of the infrastructure in the local area. For instance:

- We have heard discussions on the precariousness and unreliability of our public transport system. Modern life is busy and unpredictable; if you are a commuter and 'get caught up at work' or a school student that runs 5 mins late - then your transport options are critically reduced;
- We have heard how difficult it is for the average working family to get their children to school and travel to work in a timely manner;
- We have heard how our local facilities (clubs/activities/the preschool) are at capacity;
- We have heard that access to doctors, dentists and chemists are a car drive away;
- We have heard how our walking environment - down lanes with no pavements, next to traffic - becomes unattractive or considered dangerous at certain times of day or during certain seasons.

The discussions have demonstrated that we have spatial inequality in service provision within the village. Our village's ability to support daily activities - travelling to work; collecting kids from school; picking up shopping for dinner - is fragile. The evidence made a strong case that the proposal of 200 homes, and the influx in population, is unsuitable for Hurst and Whistley

It would involve working in collaboration with communities to find solutions that work for everyone. The reality, in this case, is that the needs, knowledge and experiences of the existing communities have not been considered. There is a wealth of research (and practice) that shows that failing to involve local people in the design process is problematic: it may result in seemingly positive short-term outcomes for developers. However, without support from local communities such developments contribute to social fragmentation and marginalisation in the long-term<sup>2</sup>. There is a clear risk this proposal falls into that trap.

Not only has there been no involvement from the local communities but little thought has been given to how the existing communities will be affected. The existing communities of Hurst and Whistley Green will be changed: negatively impacted by the introduction of this out of place, 'suburban' housing estate on the sparse, rural settlement.

This proposal goes against the theory and practice on how to plan and design places that create healthy, integrated communities. To provide just one example, the addition of around 370 cars to local, rural lanes will make walking and cycling even less attractive than they are now, reducing opportunities for social connection and decreasing physical activity.

Where is the enhancement of biodiversity? Where is the promotion of resource efficiency? Where is the improvement in walkability? Where are the inclusive processes? The answers to these questions are not considered, and as such the proposed development will lead to unintended health disbenefits to local communities.

**For the reasons described above, the proposed development would have a negative impact on the local communities and I would like the inspector to dismiss the appeal that has been raised against the wishes and decision of the local Council.**

---

<sup>2</sup> Imrie, R., S. Pinch and M. Boyle. 1996. 'Identities, Citizenship and Power in the Cities', *Urban Studies*, 33, 1255– 61. <https://doi.org/10.1080/0042098966637>.  
Institution of Civil Engineers. 2017. 'ICE Code of Professional Conduct'.