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Land East of Lodge Road, Hurst.  
APP/X0360/W22/3309202.

Andrew Alsop, Foxhills, School Rd, Hurst, RG100DR.

FOA – The Planning Inspector.

Topic: -Road congestion at school drop off and pick up times on School Road.

I wish to frame my appeal under the theory of Primary Pain and Secondary Gain.

My primary pain is the vivid memory of attending a tree planting ceremony whilst at High School for my friends sister who was tragically killed whilst leaving school one afternoon. The accident rocked the school to say the least given somebody so young lost their life whilst only in her teenage years. To watch my fiend and his family painfully try and hold their emotions together whilst they planted the tree with many watching was so disturbing and upsetting and why I'm here today.

My secondary gain is to share my experience of living in School Road so to prevent a similar devastating accident from happening again. No family and school friends should have to witness and suffer the same ordeal as I did. School Road at school drop off and pick up time is already a devastating disaster waiting to happen.

The road, which is already a narrow Rd becomes a single lane road with cars parked from the pond all the way down to the Village Hall. The cars are parked school side and resident's driveways become passing places for oncoming vehicles. Should this coincide with the local bus, refuse collection lorry or any other large vehicle travelling along the road at this time then what is already a very dangerous situation becomes even worse. As a resident, if you have to leave your property and you live school side you have to pull out into the road blind as your unable to see left or right due to the line of cars. You only have sight once your side windows are beyond the car line so at this stage the front of your vehicle is in the middle of the lane of oncoming traffic. On 3 occasions I have been fortunate to avoid accidents, one which was very close. Whilst the speed limit is 20MPH, cars traveling in the line of traffic tend to speed up so they can get passed quickly helping those waiting in driveways so to improve the traffic flow which naturally makes this worse if your are pulling out into the road blind. The situation naturally becomes a horrible accident waiting to happen. The foot path is narrow, children are in the road as they walked to or from their parked cars on on the opposite side, Mums are pushing buggies, walking dogs, other children are on bikes or scooters, they are excited to see friends or heading home after school, it does feel like perfect scenario for a devastating accident waiting to happen.

- 2.45-3.30 pm

I would urge you to visit School Rd at drop off and pick up and experience what I'm trying to get across. Please park in my drive and pull out into the traffic so you see how dangerous this situation is at the height of drop off or pick up.

As a resident, this is my experience and my view is the road infrastructure of Hurst cannot cope with one single extra car travelling around the village. This is why I oppose the development of 200 additional homes in Hurst village. I truly and passionately hope that my secondary gain of sharing my knowledge and observations prevents anybody experiencing my primary pain of planting a tree to remember a child who was tragically killed in a road traffic accident whilst leaving School.

Thank you for taking the time to read this or hear me speak.

24 Clare Woodward

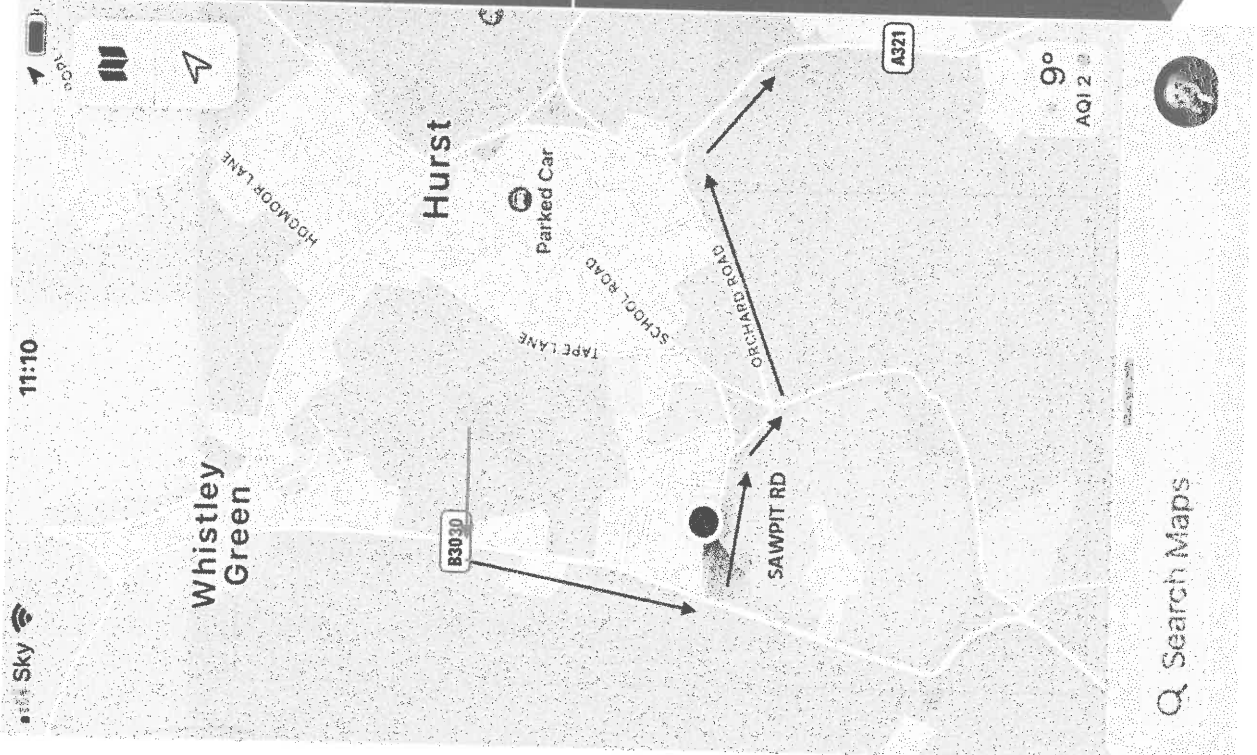
# 200 houses on the proposed development in Hurst

The impact on Sawpit Road





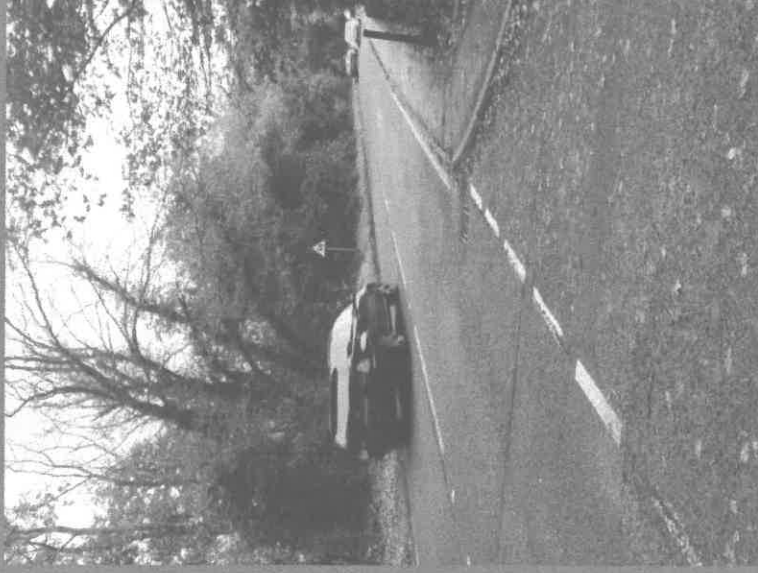
- I am Clare Woodward and have lived with my family on Sawpit Road for nearly 12 years. We love living here. Our son attends the local primary school, to which we walk each day, and our daughter now gets the local bus to her new secondary school in Wokingham.
- We are very concerned that our road will become a major thoroughfare and a cut-through for traffic to Wokingham if an additional 200 houses are built on the proposed site.



- The only vehicular entrance/exit from the new proposed development will be onto Lodge Road (B3030). This would see an approximate increase of 400 cars per day into and out of the new estate.
- The quickest route into and back from Wokingham (A321) from the new development would be left out of the site onto Lodge Road, and then left again into Sawpit Road. The only route given by all SatNavs and route planners is along Sawpit Road and Orchard Road. There is no other logical A or B road route from the B3030 to the A321. No one is going to drive from the site to Winnersh Crossroads and then onto Wokingham, and no one is going to drive up to Whistley Green and then turn onto the A321 to go to Wokingham. All the Wokingham traffic will go down Sawpit Road.
- Sawpit Road is not a suitable main road for this – it has width restriction, no pavements for the majority of the road, and it is a popular route for current residents to walk their children to school, walk their dogs and cycle.



- The junction of Sawpit Road into Lodge Road is a difficult righthand turn and there has been an accident there as recently as this summer.
- The sight lines to the right (where traffic from the proposed development will come) are very restricted. In the photos you can see the hedge gets in the way, and where the road bends cars “hide” and then pop out as they get closer.
- I am concerned about an increase in traffic at this junction.





Sawpit Road itself is unsuitable for road traffic, It has width restrictions for a reason – it isn't wide enough and it doesn't have pavements.



Midway down Sawpit Road there is a narrow width section where only one car can pass at a time. It leads into a junction where you would go left to School Road or right onto a single-track, poorly maintained road towards Orchard Road.



The road to the right would be used by traffic as the route to Wokingham (to the A321) – via Orchard Road. It is in poor repair and single track

The junction of Sawpit Road, School Road and Orchard Road is dangerous and you can't see cars coming from Church Hill.

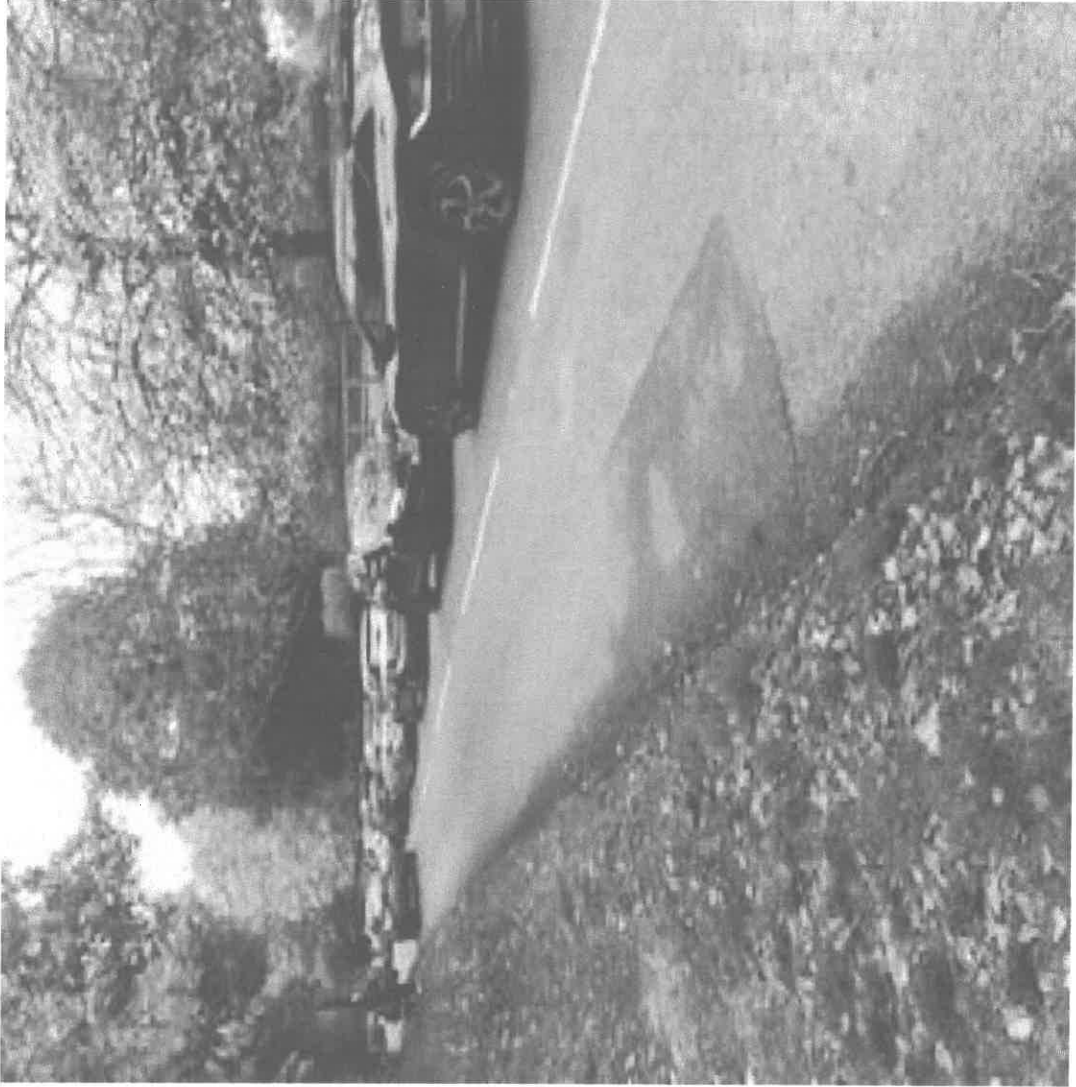
- To cross from Sawpit Road (single track section) to Orchard Road, which is the route the new residents would take to Wokingham (as I do from my house), is relatively safe as the site lines are ok
- However the return journey from Orchard Road to Sawpit Road is very unsafe, and risks car accidents as there is no site line to see traffic coming from the left.
- It is a route I as a resident avoid if possible and I choose to drive down School Road instead even if it is at school times adding to the traffic on School Road. Please see my photos of the junction – these photos are taken from Orchard Road looking towards Sawpit Road.





This shows the blind bend to where you cannot see the cars coming down Church Hill





### School Road

- School Road gets extremely busy at school drop off and pick up times and effectively becomes a single lane for traffic. I have seen cars come face to face on School Road and bring traffic to a complete standstill.
- Locals from Sawpit Road, Barber Close and Martineau Lane who walk to the school and local playgroup are often obstructed by parked cars when trying to cross the road safely with young children.
- The number of cars parked on School Road forces some cars to take a short cut to avoid School Road so they go down Orchard Road.



## Orchard Road

- Orchard Road sits between Sawpit Road and the A321
- Like Sawpit Road it has no pavements, no streetlights and is narrow at one point. As can be seen in the photo, it isn't a road suitable for lots of traffic.
- Orchard Road is already used as a cut through by people driving from Winkersley to Wokingham wishing to avoid the Reading Road. I am concerned if Sawpit Road becomes a cut through, it could turn into another Orchard Road with fast cars and lorries on a restricted road.
- I do not walk my children along Orchard Road due to speed and volume of traffic. I am worried that is what will happen to Sawpit Road.

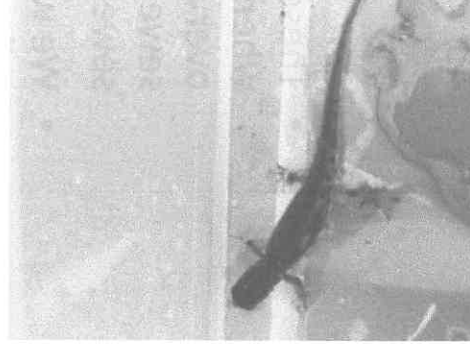
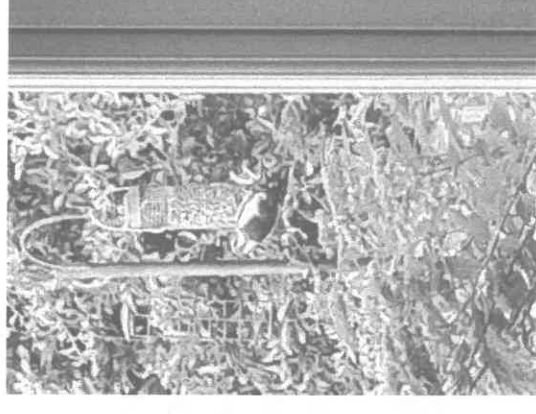
Sawpit Road is very rural – it has no streetlighting and we want to keep it that way.

- These photos were taken when I was walking back from dropping my daughter at Guides at 7.30pm on a November evening. They show how dark it is on Sawpit Road
- We have no light pollution and can see the beautiful stars in the sky. On this night I had an amazing view of the Plough in the north sky.
- I am concerned with the light pollution that the new development will create



Sawpit Road is home to lots of wildlife diversity. In building our extension we had bat and newt surveys and were advised of local species of both animals in the woods opposite our property

- We currently have a lot of amazing wildlife on Sawpit Road, and I am concerned that the new development will impact this
- Newts are very common, a family of foxes live on the road, a wide variety of birds frequent our garden, kites and an owl nest in the trees, parakeets are common, we get regular visits by stag beetles and bats, and loads of insects
- Increasing traffic and light pollution into this area will massively impact all of these species



Sawpit Road has inadequate sewerage to be impacted by a further 200 properties

- These photos are from February 2014, when the sewerage system became overwhelmed. Our garden was filled with sewerage coming up through the main sewer (top left) and polluting the garden.
- We were unable to have showers or flush toilets for over a week because of the extent of the sewerage overload.
- Thames Water at the time told us the existing system wasn't suitable for the village and needed a multi-million pound upgrade to prevent this happening again
- The proposed site would use the same sewerage system. The thought of an extra 200 properties on this already struggling, old sewer system is extremely concerning!!



**Summary** : Hurst simply doesn't have the infrastructure to support the size and site of the proposed development meaning that the proposed site is not sustainable

- The existing roads are not adequate to support the numbers of houses and the car journeys which will be generated.
- The proposed development will be a disaster for the residents who live on Sawpit Road. All new traffic will turn left out of the site to go to Wokingham and then turn left down our restricted access lane, turning it into a rat run.
- This will impact not only the current residents who live on this road, but also all the village residents who use it for walking and cycling in safety.
- With Church Hill currently closed for gasworks, we have seen what the future looks like as cars are using Sawpit Road to get to the A321. I have witnessed several near misses at the narrow width and single-track section, and the increase in traffic volume at rush hour makes walking down the road very dangerous.
- The local area (which is rural), and all the diverse wildlife in Sawpit Road will be impacted by light pollution and traffic pollution.
- The existing, inadequate sewerage in the area, and on Sawpit Road which has suffered before, will be overwhelmed by 200 new properties leading to sewerage flooding.
- For all these reasons the proposed development should not go ahead.







**TOWN AND COUNTRY PLANNING ACT 1990**

**SECTION 78 APPEAL**

**BY MACTAGGART & MICKEL HOMES ENGLAND Ltd.**

**LAND EAST OF LODGE ROAD, HURST, WOKINGHAM OUTLINE PLANNING PERMISSION FOR THE DEVELOPMENT OF APPROXIMATELY 200 HOMES, OPEN SPACE, PEDESTRIAN AND CYCLE LINKS, RECREATIONAL FACILITIES (CLASS E) AND OTHER ASSOCIATED INFRASTRUCTURE INCLUDING THE FORMATION OF A NEW HIGHWAY ACCESS ROAD FROM LODGE ROAD LOCATED ADJACENT TO THE EXISTING FIELD ACCESS TO BE CLOSED (ALL MATTERS RESERVED EXCEPT FOR ACCESS).**

**APPEAL REFERENCE: APP/X0360/W/22/3309202**

**LOCAL PLANNING AUTHORITY REF: 220458**

**STATEMENT**

**OF**

**JOHN OSBORNE**

**JANUARY 2023**

## INTRODUCTION

- 1.1 My name is John Osborne and I have lived in Lodge Road, Hurst for over twenty years
- 1.2 I have a MSc in Management Studies from Brunel University, and a BSc Hons in Environmental Health from The University of Aston in Birmingham.
- 1.3 I am retired but have held the posts of Director of Environment for Bracknell Forest Borough Council, Deputy Director of Environment for Hampshire County Council, Project Director creating and delivering The Somerset Waste Partnership, and Project Director delivering the Bus Rapid Transit, a dedicated busway between Fareham and Gosport in Hampshire.
- 1.4 I am a member of The Hurst Village Society Committee. Hurst Village Society was founded in 1972, the object of the Society being *“to preserve and enhance the character of the parish of Hurst as a living community.”* The Society has 250 members, and I am the spokesperson on planning matters on behalf of the Committee.
- 1.5 Hurst Village Society made a written submission on 29<sup>th</sup> March 2022 to Wokingham Borough Council (WBC) objecting to the original outline planning application (Ref: 220458) by Mactaggart and Mikel Homes Limited. I understand that The Local Planning Authority has forwarded this to The Planning Inspectorate prior to this Planning Appeal Inquiry but for ease of reference I have attached it as Appendix A to this statement. Furthermore it is not my intention to refer to any of the matters included in that letter that have subsequently been removed from WBC’s reasons for refusal.
- 1.6 I make this statement in agreement with, and on behalf of, my colleagues on The Hurst Village Society Committee, and I believe all of the comments made therein to be true.

## **STATEMENT**

- 2.1 “This country desperately needs more houses” is a commonly heard phrase which is frequently used to justify Whitehall mandated house building targets, and as a consequence, the presumption is in favour of development in respect of many planning decisions in England.
- 2.2 It would be very easy to shout NIMBY when people like myself, and many other local residents who I am sure will address this Inquiry, who own and live in houses in a peaceful, semi-rural, leafy location such as Hurst try to stop more houses being built there. It’s not that simplistic. People will always want to preserve the things they hold dear and it is not selfish to be concerned about villages such as Hurst losing their character and identity through a loss of landscape as well as natural habitats being concreted over to make way for a swathe of new housing.
- 2.3 I believe in the general principle that the planning system should be seen to be plan-led both at the national and local level. There appears to be agreement between the Appellant and the Local Planning Authority that because the Local Plan Update is at an early stage of preparation it will only have limited weight in the decision-making process of this Inquiry (and the national and local planning policies relevant to the determination of this Appeal are agreed within the Statement of Common Ground).
- 2.4 I am aware that although the Local Planning Authority is currently unable to demonstrate a five-year housing land supply, it has made the case that the number of houses built across the borough over the course of the past few years is in excess of the housing requirement for that period. It appears therefore that Wokingham Borough Council’s inability to demonstrate a five year housing land supply could be said to be “theoretical rather than a genuine failure” to build the required number of homes across the Borough. I respectfully request that this is borne in mind when assessing the public benefit element of ‘the tilted planning balance’.

2.5 I am concerned that an unintended consequence of what appears to be a temporary shortfall in the calculation of the housing land supply and in the scheme of things the relatively short delay in the adoption of the Local Plan, which is now expected by the end of 2023 could result in the permanent creation of a largescale urban-style development on a greenfield site that would be irreversible and damage the rural appearance and character of the village forever.

2.6 The residents of Hurst are well aware of the huge number of houses that have been built across the Borough in recent years and, in particular, the negative impact that the large estates built to the north of Wokingham have had on local infrastructure. Hurst already feels the direct effect of the marked increase in the number of cars and heavy goods vehicles that use the narrow and inadequate village roads on a daily basis. Residents have justifiable concerns about the adverse effect that this large new development will have on the volume of traffic through the village, on local schools, GP surgeries, hospitals and utility infrastructure at a time when public services are overstretched and councils have limited resources available.

2.7 Nevertheless the “tilted planning balance” does allow us as individual objectors the opportunity to support the arguments put forward by The Planning Authority and The Rule 6 Interested Party (Hurst Parish Council) that **the major adverse impacts significantly and demonstrably outweigh the benefits of this proposed development when assessed against the policies in the National Planning Policy Framework as a whole, such that the proposal DOES NOT represent sustainable development.**

2.8 Those adverse impacts can be summarised as:

- A devastating and irreversible impact on the landscape, character and appearance of the area. Hurst Village Society defined these development proposals as “speculative” when they were initially announced and that remains the same now. I believe the Local Planning Authority has referred to the proposals as the **“Wrong Development in the Wrong Location”**. I would respectfully suggest how can it be

Wrong Time

described as anything else, by reason of the scale and density of proposed dwellings on the site.

- The proposals do nothing to “protect and enhance our natural, built and historic local environment” and the development cannot be considered to be “sympathetic to the local character and history, including the surrounding built environment and landscape setting.”

2.9 I am aware that the Appellant’s proposed drainage system has been agreed by Wokingham Borough Council and Thames Water and has been included in the Statement of Common Ground. I feel compelled however to request that the deficiencies in the local foul drainage infrastructure be given further consideration particularly in view of the known recurrence of flooding incidents that affect village residents.

2.10 Hurst is in the Wargrave Wastewater Catchment Area. A Wastewater Flow Capacity Report 2018 (Wokingham WCS Phase 1) commissioned by Wokingham Borough Council regarding site allocations in the Draft Local Plan states that “Wargrave Wastewater Treatment Works can accommodate up to 80% of the sites identified but would exceed its permit level should growth exceed this.”

*Wasted  
cap  
Full  
drainage  
side  
DWR*

2.11 The Thames Water Wastewater Network Assessment 2019, provided a view of existing network capacity (prior to future growth from allocated sites in the emerging Local Plan) and shows (Figure 6.1) that “Areas of least capacity for future growth include...Twyford south of the railway line and Hurst.”

2.12 It is well recognised that the capacity of the Broad Hinton pumping station to the north of the village can be exceeded and that it can be overwhelmed at times of heavy rainfall. Residents in the areas of Sawpit Road, Martineau, Lodge Road, Whistley Green and Broadwater Lane are well aware of the warning signs in their own homes that the drainage system is failing when WCs back-up and are unusable. The area of most impact is on Broadwater Lane which has a known, recorded history of recurrent flooding incidents requiring road closures for several days as a mixture of surface water and sewage

floods the road and residents gardens. Sandbags have been issued by WBC on occasions to prevent internal flooding of residents' homes. The last two severe incidents occurred in 2014 and 2021, the former was included in the WBC Flood Investigation Report of 2016. The Environment Agency and Thames Water have stated that alleviating flood risk to properties in Hurst would require a capital works scheme that would be highly unlikely to be economically viable.

*The situation is made more critical by the fact that a Licence Continuation permits the discharge of 80 tons of toxic leachate from the Whistley Court and Lea Farm Hazardous Waste Site to be discharged into the public wastewater drainage system at Lodge Road via manhole cover 2081.*

2.13 The Appellant's proposed foul waste drainage scheme may be within the capacity of the Broad Hinton pumping station when normal conditions prevail but not at times of heavy rainfall when the overall load to the pumping station is increased by surface water ingress. If the capacity of the pumping station is not improved then the increased amount of foul water coming from the proposed development is certain to overwhelm it, increasing the frequency and severity of flooding affecting residents. There is written confirmation from Thames Water that "the law recognises that we shouldn't be held responsible for the damage caused by these events...we are only responsible for damages if the flooding results from our negligence and cannot be expected to design a network that can cope with every eventuality." This gives those residents already facing inevitable further episodes of flooding affecting their homes, no comfort at all for the future if this proposal is approved.

Just  
before the  
England  
Castle

Thank you for the opportunity to contribute to this Inquiry.

John Osborne, January 2023

## APPENDIX A

Letter of Objection from Hurst Village Society to Wokingham Borough Council

E-Mail; [Development.Control@wokingham.gov.uk](mailto:Development.Control@wokingham.gov.uk)

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

29<sup>th</sup> 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 Whistle 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



My names is Frances Davis. My husband and I were born in London and we moved first to Caversham Park in 1967 and then to Wokingham in 1970 and subsequently moved out of Wokingham with 2 daughters aged 5 and 3 in 1974 to Hurst, to the house we live in now specifically for the true peace and quiet and benefit of rural life with a small village school and were heavily involved with PTA, Brownies, Guides and women's group. Along with later caring for 6 grandchildren and back and forth to elderly parents. We are now the 2<sup>nd</sup> longest residents in Tape Lane and have enjoyed living in Hurst and being part of the village community.

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We have attended every Appeal on this field and know its been firmly declared by other Inspectors that this is an important green gap for Hurst and Whistley Green.

**"That development would harm the character and appearance of the simple and open rural landscape "**

For last 3 years I have shopped every week for my 88yr old neighbour who lived here from 1966. She was unwell and had mobility issues, she could not catch the bus to shop as it was not convenient and it would have been impossible for her to wait outside for a bus that is intermittent at best and unreliable at worst.

With help from another neighbour we have helped her in many ways, including ferrying her back and forth to Wargrave Doctors, Royal Berks Hospital in Reading, Brants Bridge Surgery, Bracknell etc. Without that assistance she quite simply could not have continued to remain in a house she loved so much. That is the community spirit which exists in Hurst amongst long term residents which again is being shown today by HVS offering a free taxi service to get here because one simply cannot rely on the very limited bus service and parking at Wokingham is limited.

It is those of us who have lived here for 40 or 50 plus years who know at first hand, the limited services, the lack of pavements all around the locality, the sewage and drainage issues and the immense harm any development of approximately a minimum of 200 plus houses will do to our landscape and community.

Hurst like any other rural village has grown slowly, but our current limited facilities and services have not and cannot ever possibly expand to accommodate such a large suburban estate being dumped in a truly rural setting with very few pavements. We and so many others rely on this green field for our own mental wellbeing. Like me, the children, residents and leisure walkers from outside love to see the green field change through the seasons, enjoy the wildlife and watch the little Shetland ponies grazing as they walk along Tape Lane.

The appellants have a blank cheque to do exactly as they like, by using reserved matters to ride roughshod over residents views and will ultimately totally destroy our village and community...it is quite simply wrong to compare the effect of just 4 houses in Sawpit to dumping 200 to 300 houses in this important field which means so much to myself and the residents of the village.

To lose the valued view of the wooded horizon, the green verges and rural view of the field and the peace and quiet and instead be faced with wall to wall bricks, tiles and roofs will quite simply destroy the character which is the reason why those directly living around the site choose to sacrifice so

much to live here and the end result will be yet more harm to the village and the community, as they will move away if they possibly can .

For some in this village the sewage and pumping facilities simply cannot cope as the sewage system is nearly up to capacity and I understand Thames Water needs somewhere in the region of £40 million to fix this. Due to climate change, we now have deluges of rain which with Hurst's naturally high water table, ends up with surface water draining into the foul water system causing toilets to fill up to the brim with sewage and manholes overflowing with sewage into their gardens. This happened as recently as a few weeks ago.

I have personally noticed the impact of climate change and these deluges and the impact this has caused to the foul drainage system – it will only get worse.

I never used to have to water my garden as we had intermittent rain all year but now with climate change we get deluges mostly Oct to Jan and being a keen gardener each year for the last few years, I have diverted and stored nearly 9000litres of rain water to water my garden, rather than allowing this to run into the foul water drainage system, because I know it is near to capacity and also because it makes sense to store rainwater. But, even with water storage, the sewage from another 200 plus houses will make the situation much, much worse for the rest of the village, especially those that already have problems.

For us and others in Tape Lane whose houses sit naturally on higher ground and are afforded full view from both ground and upper floors of this entire field, along with Whistley Green, Martineau and the heritage houses along Broadwater Lane, such development will be particularly distressing because no amount of native planting can ever reach the heights needed to shield the sheer height of walls and roofs. Given the immense change of climate in recent years of scorching summers and monsoon winters, with the added long weeks of bitter cold and frosts taking a huge toll on our own gardens, any new plantings will need many many years beyond the 5 yrs prescribed, of intense maintenance to shield even the views from ground floor level of existing houses from the suburban estate. Also, with such a mass and density of housing proposed in the "Illustrative plan" root damage from trees will be yet another hot potato to emerge. At the moment when I look out at night, the field is pitch black, but all of this will be lost as the suburban estate residents will install outside lights in their gardens, lights in their conservatories (which they will build on), even the lights on inside their houses will harm the rural dark skies of Hurst.

Hurst quite simply cannot sustain such a huge intrusion and neither can the medical services in Twyford where weekly reports of 50 minute waits to get through on the phone, lack of doctors or appointments and general dissatisfaction appears regularly on social media. Wargrave Doctors have now stopped taking patients from Hurst and Twyford. GPs who have already retired are being begged to return as there's simply nationally not enough GPs.

The one shop in Hurst while great to buy a newspaper or use the limited service Post Office is only a Convenience store and anyone like us or our neighbour whose health depends on totally fresh produce, means a trip to Supermarket by car is an absolute necessity. Online ordering from supermarkets simply does not begin to match what a cost conscious and careful shopper can achieve.

The bus does not run regularly enough at the right times and you cannot cart a weeks food shop on the bus nor could you walk to and from Twyford or Winnersh with it. You simply cannot walk to the doctors in Twyford because it is too far to walk there and back and the bus does not correlate to making or trying to make or keep appointments – we know because we have tried.

The village school is virtually at capacity and the daft idea that primary school children from age 4 can be woken at 6.30am eat breakfast and be ferried by bus at 7.30am to Colleton, then wait for the gates to open at 8am, then pay £4 a day ( no food ) for a 'before' school club and then attend 'after' school club for a further £12 a day will be way beyond most incomes. The alternative suggestion of a mother trying to walk uphill to Colleton with another in a buggy crossing back and forth the A321 to pavements often blocked by cars does not bear scrutiny, unlike back in 50s 60s 70s when women had no option but to stay home, with the sheer cost of housing/living these days means many women have no option but to somehow work and get children to and from school or care services.

Hence 2 cars are the most basic necessity especially in rural areas and Hurst is no exception.

Contrary to the opinion of appellants, the narrowness of Tape Lane does not restrict speed and the Access Only restriction I fought for is not respected as it is used as a cut through from School Road to A321. Instead it is residents drives that are used and damaged as passing points and most especially the Allotments gate access is frequently used as a major passing place or stopping area for vans and trucks thus the proposal to bring out pedestrians and bicycles at this access and indeed anywhere along Tape Lane is total insanity .

To add to this the appellants now propose altering the road junction of Tape Lane with School Road to make it even more difficult to negotiate especially for delivery vehicles . The proposed build out kerb will make turning into and out of Tape Lane far more difficult for vehicles as it will narrow the entrance to the extent that the pedestrian area with a white line will be used as part of the road for vehicles, not solely for pedestrians, so far from making this safer for pedestrians, this will make it far more dangerous. We already have drop down kerbs across School Road, but due to congestion at School run times and when there are activities at the village hall, just when these are needed the most, they are completely blocked by parked vehicles – the installation of tactile pavements are just token gestures which don't resolve anything and will just urbanise our village.

Tape Lane is 'Access Only' so that means for access to 'Tape Lane residents only' but I believe would be illegal for residents of this appeal whose address and postcode is Lodge Rd (will not be Tape Lane)...hence how will the bollard at Emergency Access in Tape Lane prevent motorcycles and electric bikes accessing Tape Lane ?

How will this be monitored/enforced?

I have been continually requesting that Access only signs are correctly repositioned back to where it started just before 'Ballacloan' but response from WBC is " When we have time " .

In short, this entire application and all the appellants claimed experts simply do not live in Hurst nor do they experience on a daily basis what those of us who actually live here do experience, and so for all above reasons this appeal should, like all the others before, be very clearly rejected .





5

From: Jessica Lake jessica.lake2016@gmail.com  
Subject: Fwd: Planning Appeal  
Date: 26 Jan 2023 at 16:42:54  
To: clerk@hurstpc.org.uk

Hi Wayne,

Apologies, but I am in London at work and will not be able to make it back by 6pm to join the meeting this evening. I have summarised my points below – please let me know if there are any issues with the below. Would also be good to understand how long I should be aiming to speak for?

Many thanks,

Jess

4 key points:

- Traffic
- Facilities
- children
- Flooding

I have four key areas that I want to focus on:

- Traffic: HVS estimated over 900 dwellings May 2021 - 20% of the
  - Developer proposes "Ways to encourage active travel and public transport" – I walk and cycle in the morning at various times between 6-7.50 and have seen a single other person cycling and only dog walkers walking. It is too far (beyond the 2km maximum for commuting and schools). There are also no street lights so not suitable for children. Single bus an hour, which does not run on time, nor every day or hour Distance to Colleton at top end
  - Current volumes of vehicles are high and queue already past the station waiting to turn left into Twyford at 7.30am Hognwood Lane
  - Waiting time to pull out of road in the morning has a significant wait – the 4,000 current volumes will be significantly impacted due to the inaccessibility to the site. Turn out lodge road dangerous
  - Car parking provision is insufficient – majority of people have multiple cars, especially in a location that exceeds the maximum preferred, just a look at the parking Hurst Road, where people have space for multiple cars and every night there are cars parked on the road and most houses opposite the shop have parking and also park on the road
- Facilities: only 16 one bed flats
  - Piggott school already >50 didn't get in last year and whilst already being extended to accommodate – do not want to further be impacted by my children not getting in
  - The facilities of a village shop and post office – people parking outside the shop causes significant congestion already and the sub post office often has lengthy queues past the door to the shop (also has been closed a lot of the past year due to unforeseen circumstances)
  - Green man – closed for significant time
  - "bakery" – is not one
  - Playpark – very small and kids often queuing to get on the different times
  - Doctor – over two week wait to get an appointment already, even with people from Twyford going to Wargrave
  - Dentist – no NHS dentists available in the area – where will all these people go, especially recreation - open space of which plenty wand.

from affordable housing

- Children:

- Hurst is a nice rural, safe area – doubling the number of houses in central Hurst will detract from this –
  - kids will not be able to walk safely to each other's houses with increased traffic
  - will not be able to even cross the road safely to go to shop / see friends other side of main road
  - Will not be able to safely cycle to Piggott (if they get in!)

- Flooding:

- The site floods every year, for weeks at a time
- Live on Hogmoor Lane, which often floods and has been closed before – extra development will worsen flooding on Broadwater Lane (knee high flooding) and Hogmoor Lane, by displacing extra groundwater to other areas
- I go running round the roads and am often forced into the middle of the road due to flooding – Sawpit Lane which has just had permission impassable in winter. Building work has stopped there – maybe due to water conditions in winter?
- Knee high water on Broadwater Lane  
– this would exacerbate this

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**Say **NO** to 200 new homes in Hurst**

Graham Welch  
Crackington  
Tape Lane  
Hurst

### Graham & Ruth Welch


- 22 years resident in Tape Lane
- Moved here to live in a quiet rural location
- Beautiful views across the field
- Horses, Ponies, Donkeys, Foxes, Deer, Badger
- Bird life using the hedgerows and trees
- No street lights polluting the night sky

### We love Hurst, however


- Everyone has to use a car for Shopping, Drs, Work etc
- Speeding is a major issue, in and around Hurst
- No pavements on numerous roads
- Challenging junctions at either end of Tape Lane, numerous near misses
- We have to have logs on the lawn




### Transport and Safety



- 200 new homes = 400 to 500 additional cars, vans and lorries using the local roads
- Nowhere around Hurst is easily accessible on foot
- Sawpit, Orchard, Broadcommon, Hogmoor, Church Hill, Whistley Green and Tape Lane have no Pedestrian Pavement
- We have to play 'Chicken' with the cars when walking in Tape Lane to get them to slow down
- I've spoken to numerous Mum's who have children at the school who play 'Chicken' with the cars every day
- Pets mown down by cars



Numerous Near Misses Turning Left on to A321 North





### Accidents are happening



02/02/2020 Diamond Villas, Broadwater Lane, three cars written off  
Driver fell asleep at wheel circa 6am



30/03/2017 Parked car written off by drunk driver

### Transport and Safety

- Parents and Children who can, do walk to the school on our roads with no pavements
- For those that don't walk, cars parked along School Road increase the risk to pedestrians and cyclists
- 400-500 additional vehicles will hugely increase the risks to drivers, cyclists, riders and pedestrians




School Road mornings and afternoons makes turning very challenging

### Increase in vehicle numbers

- Massive impact on Whistley Green
- A road with no pavement and parked cars
- This road is a 'proposed' walking route from the proposed development to Colleton School




Itinerary from proposed development towards Whittington, Brackley & Brackley



Cars don't turn right from the junction to go towards Whittington, Brackley, Whittleby unless absolutely necessary

So many motorists turn right from the junction that it is not possible to have a vehicle at a time BUT according to traffic from Hurst, also see the turning to turn left onto Lodge Road.



Hurst

Road map  
Proposed Site  
Exit options.

Impact on Whitley Green from proposed development

Drivers wanting to go South on A329

Towards Whittington, Brackley and Brackley



They will turn right into Whitley Green which will become more of a cut through than it already is.

If 50% of residents need to travel South on A321 that would be 200-250 Vehicles a Day!



### Rural challenges but we still love Hurst

- We do not want it to get worse
- 400-500 additional cars will make it much worse
- Tape Lane most affected Visually
- The whole village impacted by Traffic and associated Pollution
- An unwanted imposition on the Rural aspect of the village

### Overdevelopment

- Hurst is 575 homes in total across the wider catchment area
- Hurst centre which includes Whitley Green is just over 400 homes
- Proposed site adjacent to Lodge Road and Tape Lane is the only green space separating the two communities
- 200 New homes would be a 50% increase in homes
- Massive Overdevelopment

### Environmental Impact

- Loss of the field would have a massive impact on the local flora and fauna
- 200 homes and the associated roads and pavements would decimate the wildlife we all enjoy
- Noise, exhaust and light pollution from a housing estate will destroy the rural aspect of Hurst and its community

### In Summary

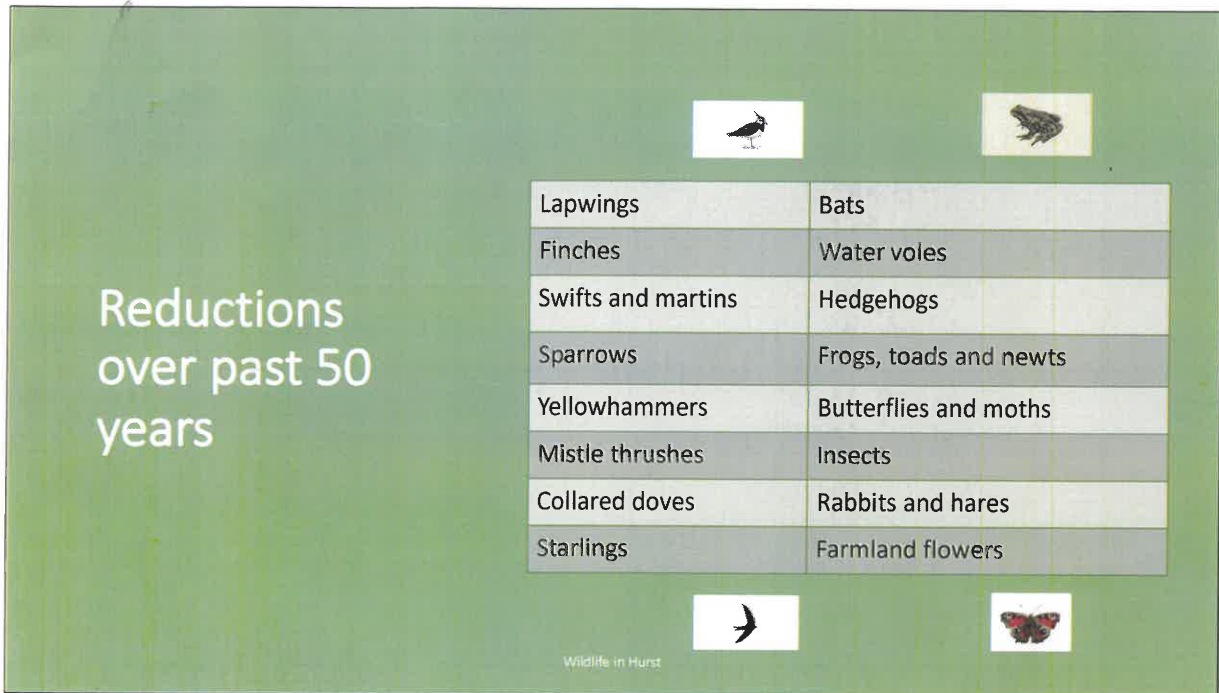
- 50% increase in homes in centre of village
- 400-500 additional vehicles
- Safety concerns for all
- Environmental Impact
- An overbearing unsustainable suburb more suited to a large town than a small rural village
- For the sake of residents this cannot be allowed to happen
- Develop Brownfield not Greenfield







My name is John Edwards. I live in an Area of Special Character just outside the main settlement and I am fortunate to have fields front and back. I have lived here for 52 years during which time I have noted a significant loss of flora and fauna in the locality.



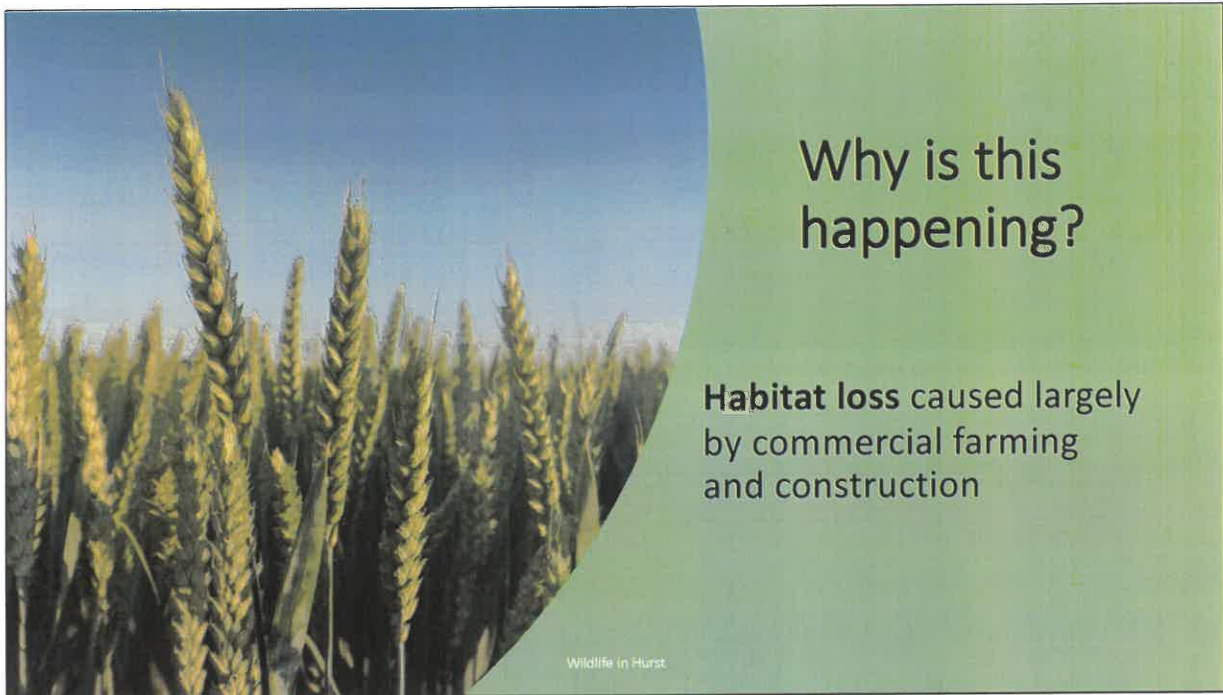
Numbers and types of farmland birds, garden birds, small mammals, amphibians, wildflowers, insects and especially pollinators and butterflies are all diminished. In that time Hurst's wildlife has been depleted of many lapwings, finches, swifts, martins, sparrows, yellowhammers, Mistle thrushes, collared doves, bats, water voles, hedgehogs, frogs, toads and newts, rabbits and hares, farmland flowers, many butterflies and moths and so many insects. My children used to help in the garden and enjoyed watching woodlice, earwigs, centipedes and ground beetles- these creatures are now rarities.

Just this weekend I participated in the RSPB's Garden Bird Watch as I have done over the past 40 years. This year I recorded just 10 species. 15-20 years ago, it was closer to 20 species.

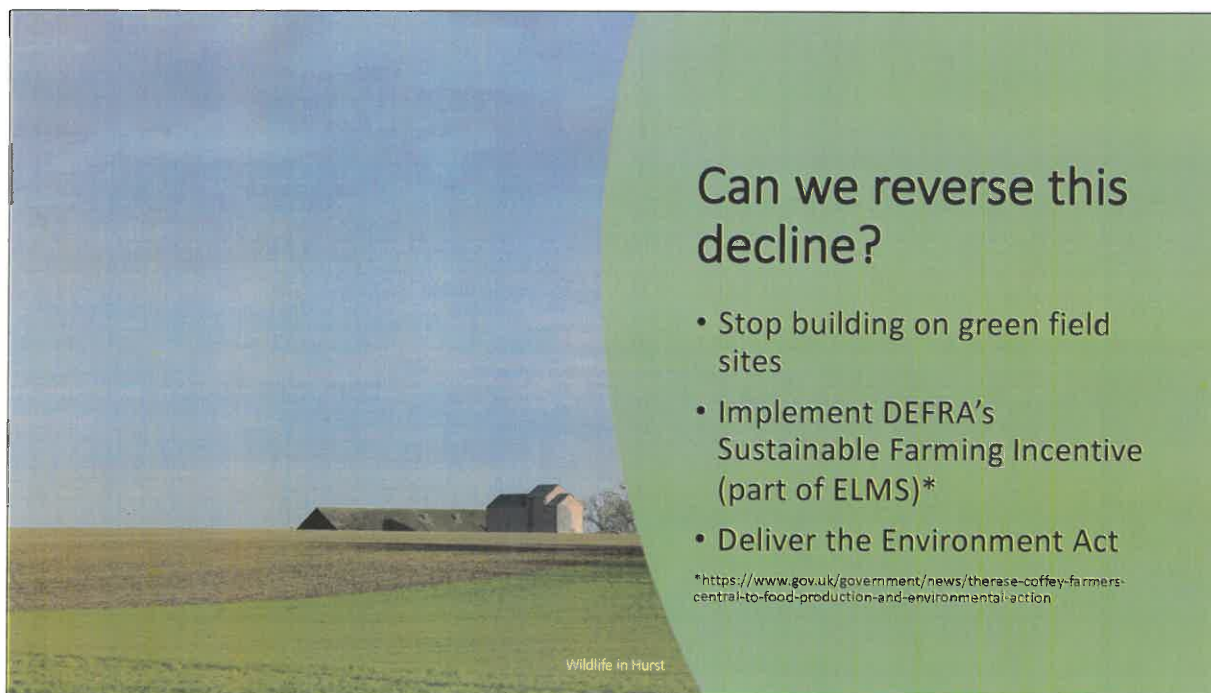
This is reflected throughout the UK with almost half of biodiversity disappearing in that same time frame.

Here's a couple of examples; In 1996 there were 36 bird species under threat and recorded on the Red List. Today the number is 70.

The butterfly survey last year recorded just 9 butterflies per count which is an all-time low in the 13 years the citizen science project has run. Surprising and worrying since it was warm sunny summer.



Much is caused by loss of habitat to commercial farming and construction, and this leaves the UK as one of the worst-rated nations in the world. Increased use of herbicides and pesticides over the years has degraded the habitats and removed valuable food sources for wildlife.



In the UK, DEFRA is rolling out the Sustainable Farming Incentive (part of ELMS) that will provide farmers with a range of paid actions to manage hedgerows for wildlife and grow crops without herbicides and pesticides.

Six additional standards will be added to the Sustainable Farming Incentive this year, meaning farmers can receive payment for actions on hedgerows, grassland, arable and horticultural land, pest management and nutrient management.

In addition, the Government has introduced the Environment Act 2021 that will deliver a raft of measures to protect our rivers, tackle deforestation and preserve habitats, and will be backed up by a set of legally binding targets due to enacted later this year.

## Are we making progress?

- Office for Environmental Protection report 2023 \* states:
  - *...many extremely worrying environmental trends remain unchecked, including a chronic decline in species abundance*
  - *We assessed 23 environmental targets and found none where Government progress was demonstrably on track*
  - *It identifies eight attributes essential for a new and effective Environmental Improvement Plan*

\*Progress on Improving the natural environment in England 2021/2022.

<https://www.theopen.org.uk/report/progress-improving-natural-environment-england-2021/2022>

- UK government allows 'emergency' use of banned bee-harming pesticide just days after EU tightens protections

<https://www.wildlifetrusts.org/news/government-allows-banned-pesticide>

### A sorry story

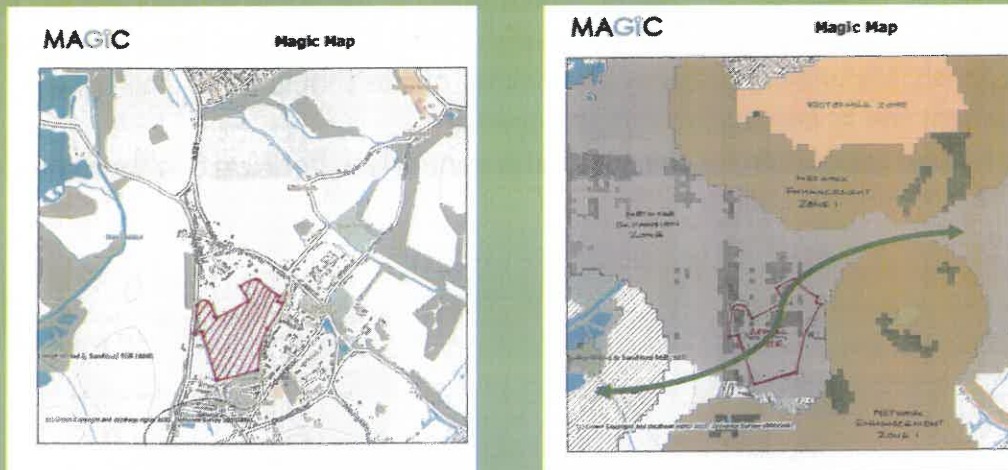
Just last week, the Government's own watchdog, the Office for Environmental Protection issued a damning report that highlighted "many extremely worrying environmental trends remain unchecked, including a chronic decline in species abundance."

"We assessed 23 environmental targets and found none where Government's progress was demonstrably on track."

The report goes on to identify eight attributes for a new and effective Environmental Improvement Plan (EIP). Let's hope the Government takes notice.

thiamethoxam on sugar beet. This is another example of the government failing to follow their warm words with meaningful action. It is shameful.

## The site in the landscape



Wildlife in Hurst

The left hand map shows the site positioned between Whistley Green to the north and the main settlement to the south and east.

Parts of Hurst and Whistley Green are designated by DEFRA and Natural England as Network Enhancement Zones. This land connecting existing patches of primary and associated habitats that is likely to be suitable for creation of primary habitat. The land between these sites is designated as a Network Expansion Zone and this is land with potential for linking/joining networks across the landscape. All of this has been dismissed by the appellant and WBC as being of any relevance or importance to Hurst, which I disagree with.

To the west lies the Lodge Wood and Sandford Mill SSSI, Lea Farm and Lavell's Lakes. To the east is the Haines Hill estate and the Green Belt. Thames Valley Environmental Records Centre has gathered sightings from wildlife organisations visiting these sites dating back to 1993. Thousands of records of flora and fauna demonstrate the value to wildlife of these sites and many animals have been seen by local residents visiting or passing through the Appeal site.

There are other DEFRA maps show the area is targeted in Countrywide Stewardship schemes with Lapwings shown as a priority species. Habitats for Redshank, Turtle


Dove, Yellow Wagtail and Grey Partridge are also to be encouraged.

The Appeal site sits in the middle of a critical wildlife corridor between these east and west habitats. Shown as the green arrow. Consequently, the development of the site will cause demonstratable and irreplaceable harm to Hurst's wildlife. By the appellants ecologists own admission, Hurst will be losing nearly 45% of its wildlife habitat on this site. It doesn't matter how much green infrastructure they propose to plant, this will never make up for the loss of wildlife habitat area. It would be an even greater loss to Hurst as the Appellant proposes to claim offsite BNG 8 kilometres away in another distant parish; My understanding is that habitat offsite should be as close to the development site as possible, to mitigate the harm.

A more helpful application for the site that is generally waterlogged in the winter, would be a rewilded wetland.



**Biodiversity Net Gain**



Wildlife in Hurst

- Durrell Institute of Conservation and Ecology (DICE) at Kent University reports

Exploring the ecological outcomes of mandatory biodiversity net gain using evidence from early-adopter jurisdictions in England \*

- *However, this preliminary evaluation highlights that mandatory BNG as currently implemented at the local level risks poor outcomes for biodiversity when implemented nationally, unless key aspects receive additional attention. Many of these problems are paralleled by those in other biodiversity offsetting systems around the world*

<https://conbio.onlinelibrary.wiley.com/doi/full/10.1111/conl.12820>

**Transformative action on biodiversity required by Government**

*We have conducted recent work showing the biodiversity outcomes of mandatory Net Gain are threatened by the potential for biodiversity gains to go unenforced, by a lack of coordination between Net Gain and councils' Local Nature Recovery Networks, and by a lack of relevant ecological expertise amongst both planners and consultants*

\*<https://www.kent.ac.uk/news/environment/29240/expert-comment-transformative-action-on-biodiversity-required-from-government>

**Poor outcomes so far with little enforcement and evaluation.** We don't have a Local Nature Recovery Network in Berkshire as yet – so who will be monitoring the offsite implementation, monitoring and effectiveness? The resources of WBC are limited and with the increase in offsite BNG sites to monitor throughout the Borough, I am not confident that any conditions agreed will be properly governed and what actions of recourse will the residents have?

## Summary

- Not only will Hurst lose a valuable greenfield site, but we lose our wildlife within it.
- Government vision and rhetoric is great but the tools and commitment to implement effective nature recovery and BNG are under question.

The Government mantra is "the right homes in the right places."

This development would clearly be the wrong homes in the wrong place.

Wildlife in Hurst



POLICY PERSPECTIVE | Open Access |

## Exploring the ecological outcomes of mandatory biodiversity net gain using evidence from early-adopter jurisdictions in England

Sophus O. S. E. zu Ermgassen , Sally Marsh, Kate Ryland, Edward Church, Richard Marsh, Joseph W. Bull

First published: 09 June 2021 | <https://doi.org/10.1111/conl.12820> | Citations: 2

Figures References Related Infor

### Recommended

[Aligning ecological compensation policies with the Post-2020 Global Biodiversity Framework to achieve real net gain in biodiversity](#)

Jeremy S. Simmonds  
Amrei von Hase  
Fabien Quétier  
Susie Brownlie  
Martine Maron  
Hugh P. Possingham  
Mathieu Souquet  
Sophus O. S. E. zu Ermgassen  
Kerry ten Kate  
Hugo M. Costa  
Laura J. Souter

Conservation Science  
and Practice

[Moving from biodiversity offsets to a target-based approach for ecological compensation](#)

Jeremy S. Simmonds

### Abstract

Net outcome-type biodiversity policies are proliferating globally as perceived mechanisms to reconcile economic development and conservation objectives. The UK government's Environment Bill will mandate that most new developments in England demonstrate that they deliver a biodiversity net gain (BNG) to receive planning permission, representing the most wide-ranging net outcome type policy globally. However, as with many nascent net-outcome policies, the likely outcomes of mandatory BNG have not been explored empirically. We assemble all BNG assessments (accounting for ~6% of England's annual housebuilding and other infrastructure) submitted from January 2020 to February 2021 in six early-adopter councils who are implementing mandatory no net loss or BNG requirements in advance of the national adoption of mandatory BNG, and analyze the aggregate habitat changes proposed. Our sample is associated with a 34% reduction in the area of nonurban habitats, generally compensated by





**Office for  
Environmental  
Protection**

# **THE OFFICE FOR ENVIRONMENTAL PROTECTION**

Presented to Parliament pursuant to section 28(7)(a) of the  
Environment Act 2021

January 2023

# Executive Summary and Recommendations

Government's ambition is to be the first generation to leave the environment of England in a better state.

This ambition was first articulated in 2011 in the Natural Environment white paper. It was a manifesto commitment in 2017, followed in 2018 with the 25 Year Environment Plan (25 YEP). This Plan set out Government's commitments and goals for realising its ambition.

The Environment Act 2021 then provided a new governance framework for the environment, with four key provisions: a new oversight body; a long-term Environmental Improvement Plan (EIP) that must set out the steps HM Government intends to take to improve the natural environment; statutory targets; and an Environmental Principles Policy Statement applicable across government.

Parliament has established the Office for Environmental Protection as the new oversight body and has designated the 25 YEP as England's first EIP. But Government has been slow to act. It was late to set the legally binding long-term targets for the environment required by the Environment Act 2021 and has not yet published the required Environmental Principles Policy Statement. It is due to complete the first statutory review of the EIP by 31 January 2023.

With this report, we provide our independent assessment of Government's progress in improving the natural environment, in accordance with the EIP for England in 2021/2022. This is as required by section 28 of the Environment Act 2021. Where appropriate, we also assess progress over a longer period.

## Are Government plans for the environment working?

**Our view is that the 25 YEP has so far failed to bring about the changes needed, at the pace and scale required, to meet Government's stated ambitions for the environment in England.** The natural environment in England remains under serious threat. It is characterised by adverse trends in many areas, frequent failure to make progress towards targets, and a lack of progress in addressing existential risks, including from climate change.

**We assessed 32 trends across the breadth of the natural environment; nine trends were improving, eleven were static, and eight were deteriorating.** We were unable to make a sufficiently reliable assessment of trends in four areas due to a lack of evidence. National trends for clean air and climate change mitigation are somewhat encouraging. Conversely, there is a deeply concerning decline in biodiversity. Our assessment here is especially hampered by a lack of adequate reporting of recent data. However, the available evidence suggests that, among other adverse trends, abundance of priority species declined by 17% between 2013 and 2018, coming at the end of a chronic decline between 1970 and 2018. The situation is poor across the board, with adverse trends across marine, freshwater and terrestrial environments.

**We assessed 23 environmental targets and found none where Government's progress was demonstrably on track.** For 14 of 23 targets (61%), we considered progress was off track, in some cases significantly so. We were unable to assess the remaining nine targets due to baselines set in the future or a lack of sufficient evidence. Government data show that many targets are at significant risk of not being achieved, including targets relating to improving water quality and halting the decline in the abundance of species.

**Climate change is exacerbating the challenge facing government and its impacts are likely to increase.** Progress towards climate change adaptation is poor and many of the steps necessary to adapt and to improve resilience have not yet been taken. With around two-thirds of land in England in agricultural use, it is particularly concerning that climate change adaptation within this sector is consistently given the worst rating by the Climate Change Committee.

## **Why have Government plans not worked and what can be done better?**

There are several background reasons why the 25 YEP is not yet delivering improvements as it should. To begin with, it was not grounded in a comprehensive baseline for the state of the environment and did not state clear and ambitious targets for all goal areas, leaving some areas adrift. Then, during its lifetime, strategy and policy responsibilities were repatriated to the UK, with Defra developing a significant number of new policies in recent years. The Government has faced exceptional challenges since 2018: a pandemic, a war in Ukraine, and now a cost of living crisis. Together, these developments have exacerbated a known problem – a lack of coherence in environmental strategy and policy within Defra and across government – that in all probability has held back progress.

This picture of progress with the existing 25 YEP need not be dispiriting. There are opportunities for Government to change trends, make positive progress towards targets, and secure significant environmental improvements. The requirement for Government to review and refresh the EIP at the end of January 2023 provides a clear basis for a new plan and more effective implementation. **With this in mind, we have identified eight attributes of a new and effective EIP:**

**An effective new EIP would clearly translate vision into policies, commitments and actions for the whole of government.** The 25 YEP had ambition but lacked clarity and commitment. Government’s ambition “to leave our environment in a better state than we found it” represented a positive shift away from simply protecting the environment and towards environmental recovery and enhancement. Realising the ambition will require alignment and co-ordination at all levels, local and national, and actions that extend beyond Defra, across government and all sectors of society.

**An effective new EIP would establish clear governance arrangements that drive delivery on the ground.** Governance arrangements for the 25 YEP were unclear and complex. There is an abundance of environmental plans, strategies and policies. These are often presented without context or explanation of how policy measures interact, or of their relative importance. The bodies and mechanisms for delivery and decision-making for all these strategies and policies are similarly numerous and unclear, making it difficult to discern who is responsible for what.

**An effective new EIP would have a unifying overall delivery plan and one for each goal area.** The 25 YEP lacked a unifying delivery plan. This hampered effective policy development and left implementation inadequate. Effective delivery plans would define outcomes (including targets and their means of assessment) and the specific policies and activities that contribute towards their achievement. Effective delivery plans will provide assurance that government’s activities will deliver outcomes, improve coherence across policies, and make clear who is accountable.

**With new long-term targets set, an effective new EIP would set and pursue clear and achievable interim targets that are as ambitious as possible in the areas needing most attention.** The Environment Act 2021 long-term targets are now set and specify a vital set of long-term outcomes. Interim targets must be suitably ambitious in order to front-load action, to stimulate nature's recovery, and to make early and rapid progress towards long-term outcomes. Gaps in targets remain to be addressed and there must also be clarity in how Environment Act 2021 targets work alongside wider, existing commitments.

**An effective new EIP would make clear use of robust and current data and analyses that are well aligned with all targets.** Government's published data about the natural environment are not yet adequate for monitoring progress across all goal areas. The Outcome Indicator Framework is a challenging endeavour and is a work in progress, but it is not yet sufficiently comprehensive. The Framework should include indicators to track progress against all targets. Some indicators are unsuited to measuring the specified policy outcome. For others, reporting of available data lags by several years.

**An effective new EIP would establish an evaluation framework and use it to generate feedback on actions and progress, to learn and to improve delivery.** The 25 YEP lacked a purpose-driven monitoring, evaluation and learning framework. The Outcome Indicator Framework is the main platform for bringing together and sharing environmental monitoring information. The Annual Progress Report addresses the statutory requirement for government to report on EIP implementation, but it remains largely an account of policy development and actions taken, more than of progress made, outcomes and impacts realised, or prospects of environmental improvement. These two reporting mechanisms should be more closely integrated and embedded in a broader EIP evaluation framework for learning promptly how to improve delivery.

**An effective new EIP would diagnose the cause of adverse trends, identify the most urgent, harmful or widespread concerns, and develop effective and timely responses.** There has been limited progress in synthesising and interpreting evidence for the key drivers of change and the pressures on the environment, or the relationships between these drivers and pressures and their cumulative impacts. This understanding is critical to effective implementation and adaptation.

**An effective new EIP would develop assessment regimes that look more to the future, anticipate trends and project outcomes.** Assessing progress towards an improved natural environment has so far been largely retrospective. Robust predictive quantitative and qualitative assessments of future states of the environment can help government foresee the effects of current and proposed policy, and indicate the likelihood of achieving, or not achieving, targets in future.

## Conclusion

**Overall, we do not think the current pace and scale of action will deliver the changes necessary to improve the environment in England significantly, as required by the Environment Act 2021.** The Act provides government with the tools necessary to achieve this, but only if they are used in a timely manner and with commitment.

Government must review the 25 YEP by 31 January 2023, set interim targets, and ensure it details the measures intended to deliver a significant improvement in the natural environment. We look forward to welcoming an enhanced EIP, that rises to the challenges of realising Government's ambitious vision.



**Government must do more to close the gap between the current reality and its vision of the future or it will fail in its ambition. It must act with energy and urgency if it is to deliver significant improvement of the environment in England for the next generation.**

## **Recommendations**

In last year's *Taking Stock* report,<sup>2</sup> we made 16 recommendations to Government (Annex One). They all remain entirely relevant. We make five further recommendations here. We hope to see all our recommendations followed through as Government publishes and implements the new EIP for England.

### **Recommendation 1: Implement the next Environmental Improvement Plan effectively.**

Government should take the opportunity to jump start the next EIP immediately after publication. We have identified eight attributes of a new and effective EIP that should address the shortcomings of the previous plan. Government should drive bold, prompt action where most needed, for example in relation to species abundance. It should use all tools at its disposal, and work at pace and at scale.

**Recommendation 2: Develop and implement clear governance.** Government should make clear who is accountable, how decisions are made, and how delivery of the new EIP will be assured across government as a whole. In our view, the Cross-Government 25 YEP Delivery board could have full authority to oversee, co-ordinate and drive forward action to implement the new EIP and should be accountable for ensuring delivery. Publication and application of the Environmental Principles Policy Statement remain indispensable in this regard.

**Recommendation 3: Develop and implement unifying delivery plans.** Government should establish a unifying delivery plan for the new EIP, and a delivery plan for each of its goal areas. Each plan should build on an understanding of drivers and pressures, define outcomes, set out all targets and their means of assessment, establish clear governance, and identify the specific policies and activities that contribute towards their achievement.

**Recommendation 4: Set and vigorously pursue clear and achievable interim targets that are as ambitious as possible in the areas needing most attention.** All targets will require prompt and concerted effort. To ensure adequate progress, Government should now set interim targets that will drive immediate action, enable nature's recovery, and allow assessment of progress.

**Recommendation 5: Implement an effective monitoring, evaluation and learning framework.** Data must be made available that are adequate for understanding underlying drivers and trends in environmental protection, as well as monitoring improvement and assessing progress towards targets. By the time of government's next annual reporting period, data should be comprehensive, current and consistent with the standards detailed in targets. Predictive assessments should underpin government's plans and actions. Government should establish an evaluation framework for the EIP to enable learning and feedback that will ensure effective delivery in the long-term. Government's reporting should combine quantitative assessments with evaluation evidence to provide more rigorous accounts of progress.

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<sup>2</sup> Office for Environmental Protection, *Taking Stock: Protecting, Restoring and Improving the Environment in England*.



# Transformative action on biodiversity required from Government

**Olivia Miller**

1 July 2021

**Environment**

(<https://www.kent.ac.uk/news?category=environment>)



Picture by Unsplash

Following the UK Government Environmental Audit Committee's report on Biodiversity and Ecosystems, focusing on how to reverse declines in biodiversity in the UK, Sophus zu Ermgassen

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(<https://www.kent.ac.uk/legal/cookies.html>)

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the Durrell Institute of Conservation and Ecology (DICE)  
(<https://research.kent.ac.uk/dice/>), says:

‘The Report outlines the scale of the crisis facing the natural world in the UK. It also documents the many government targets and policy statements aiming to direct action towards reversing this decline, such as the government’s proposal to adopt a target for species abundance for 2030. Such targets are promising and have the potential to underpin genuine action to halt biodiversity loss.

‘But concerningly, the report highlights the great distance between the government’s actions and the rhetoric. Despite the promises, the government failed to achieve 14 of its 20 international biodiversity commitments (Aichi targets) in 2020; a major failure for one of the world’s wealthiest economies with a population that generally supports better nature protection. We have also conducted recent work demonstrating that the UK has significantly deprioritised spending on nature over the last decades in comparison with other nations; whilst other countries have generally increased their spending on nature protection as a percentage of GDP over the last decade, the UK has reduced their spending relative to GDP, showing that protecting nature has actually declined as a real policy priority.

‘Additionally, the report highlights the benefits that could come from better coordinating different nature protection policies, investing in improving ecological capacity within local councils, and improving the enforcement of environmental policies. These are all essential pieces of the puzzle, and I highly welcome these recommendations. For example, all of these weaknesses have been identified in the context of the government’s commitment for all new developments to deliver a mandatory Net Gain in biodiversity. We have conducted recent work showing the biodiversity outcomes of mandatory Net Gain are threatened by the potential for biodiversity gains to go unenforced, by a lack of coordination between Net Gain and councils’ Local Nature Recovery Networks, and by a lack of relevant ecological expertise amongst both planners and consultants. We urge the government to take the Report’s recommendations extremely seriously, and to translate their positive rhetoric into transformative action’.

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/ News / UK government allows 'emergency' use of banned bee-harming pesticide just days after EU tightens protections

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# UK government allows 'emergency' use of banned bee-harming pesticide just days after EU tightens protections

Monday 23 January 2023

## UK government allows 'emergency' use of banned bee-harming pesticide just days after EU tightens protections

Today, 23 January 2023, the government has announced that for the third year in a row, it will permit the use of the banned pesticide thiamethoxam - a type of neonicotinoid - on sugar beet in England in 2023. A single teaspoon of neonicotinoid is enough to deliver a lethal dose to **1.25 billion bees**. This comes just four days after the Court of Justice of the EU (CJEU) declared that providing emergency derogations for expressly prohibited neonicotinoid-treated seeds is not in line with EU law. [3]

This emergency authorisation comes a month after the UK government was advocating for a global pesticide reduction target at the [UN COP15 biodiversity talks in Montreal](#). Despite a global pesticide target being significantly watered down in the final deal signed at COP15 [4], UK negotiators supported more robust action. It is disappointing that the same approach is not being taken when it comes to domestic pesticides.

Three neonicotinoids (NNS) including thiamethoxam were banned for outdoor agricultural use in the UK and the EU in 2018 due to their devastating impact on bees. [5] Despite UK guidance stating that emergency applications should not be granted more than once, last year the government handed the industry a second

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This year the UK Expert Committee on Pesticides (ECP) once again advised against allowing thiamethoxam to be used and likewise were again ignored by the government. Despite significant public interest in the plight of bees and other pollinators, the process for emergency authorisation has been shrouded in secrecy, with no opportunity to scrutinise the application [6].

This authorisation is another example of the government failing to follow their warm words with meaningful action when it comes to pesticides and biodiversity. This latest move is completely at odds with the stronger pesticide reduction targets the UK advocated for at COP15, as well as the Leader's Pledge for Nature it signed in 2020, which sought to raise global ambition on reversing biodiversity loss. It highlights the growing discrepancy between government words and action on pesticides in particular and broader environmental issues.

This latest authorisation also raises wider concerns over whether the government will maintain existing restrictions on neonicotinoids and other harmful pesticides, or whether they may be overturned as part of a forthcoming bonfire of regulations that protect nature, wildlife and communities as part of the Retained EU Law Bill [7].

**The Pesticide Collaboration, a coalition of health, environmental, farming and consumer groups, academics and trade unions - including organisations such as Breast Cancer UK, Unite and Friends of the Earth - says that the government's decision to approve its use for the third consecutive year is a total failure of responsibility to protect vital species, and shows a lack of urgency in reducing pesticide use for the sake of human health and the environment.**

**Joan Edwards, director of policy & public affairs at The Wildlife Trusts, said:**

"Just last month, the Secretary of State Thérèse Coffey committed the UK to halving the environmental impact of damaging pesticides by 2030. However, today she has incompatibly authorised the use of a banned neonicotinoid, one of the world's most environmentally damaging pesticides, defying the advice of the Government's own Expert Committee on Pesticides for a third year in a row.

"Only a few days ago, the EU's highest court ruled that EU countries should no longer be allowed temporary exemptions for banned, bee-toxic neonicotinoid pesticides, putting half of all such derogations to an end. Yet this Government deems it acceptable to allow the use of a toxic pesticide that is extremely harmful to bees and other insects, at a time when populations of our precious pollinators are already in freefall. This is unacceptable when the Government should be implementing fast, meaningful support to help farmers move away from a reliance on toxic pesticides."

**Amy Heley, Public Affairs and Media Officer at the Pesticide Collaboration said:**

"In previous years, Defra insisted that the sugar industry must make progress in finding alternatives, but we are yet to see any outcomes of this. The Pesticide Collaboration is deeply concerned that this emergency derogation is simply another example of the government failing to follow through on their own pledges to improve the environment and protect human health."

**Anabel Kindersley, Co-owner of Neal's Yard Remedies said:** "Many businesses beyond farming benefit from the UK's track record of high standards on environmental protection, including manufacturers, brands and retailers with a British agricultural supply chain, as well as hospitality and tourism businesses based in the British countryside. It is challenging for businesses to maintain a reputation for quality, if they are linked to activity that is destroying nature. We believe that by acting against the advice of its own scientific advisors, the government is putting the UK's well-deserved reputation at risk."

Press release

# Thérèse Coffey: Farmers central to food production and environmental action

Government speeds up Sustainable Farming Incentive roll-out with new sets of paid actions to support food production and environmentally responsible farming.

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From: [Department for Environment, Food & Rural Affairs \(/government/organisations/department-for-environment-food-rural-affairs\)](#) and [Rural Payments Agency \(/government/organisations/rural-payments-agency\)](#)

Published 26 January 2023



Credit: Dmitry Naumov

Rural Affairs has today (Thursday 26 January 2023) set out detailed plans for the nation's farming sector, supporting farmers to be profitable and resilient as they produce food sustainably while protecting nature and enhancing the environment.

The accelerated roll out of the Sustainable Farming Incentive - a key part of the Government's Environmental Land Management schemes - will provide farmers with a diverse range of paid actions to manage hedgerows for wildlife, plant nectar-rich wildflowers and manage crop pests without the use of insecticides.

These incentives will make food production more resilient and efficient over the longer term whilst contributing towards the UK's environmental goals on carbon, biodiversity, water quality and net zero. Together this will safeguard the long-term prosperity of the farming industry and protect the environment for future generations.

Environment Secretary Thérèse Coffey said:

“ Farmers are at the heart of our economy - producing the food on our tables as well as being the custodians of the land it comes from.”

“ These two roles go hand-in-hand and we are speeding up the roll out of our farming schemes so that everyone can be financially supported as they protect the planet while producing food more sustainably.”

## **Environmental Land Management**

Six additional standards will be added to the Sustainable Farming Incentive this year, meaning farmers can receive payment for actions on hedgerows, grassland, arable and horticultural land, pest management and nutrient management. They build on the three existing standards to improve soil health and moorlands introduced in 2022 – which nearly 1,900 farmers already have in agreements.

The Government has also detailed what farmers will be paid to deliver through an enhanced version of the



Countryside Stewardship scheme, which will see around 30 additional actions available to farmers by the end of 2024. The expansion builds on the more than 250 actions farmers can take at present with the scheme seeing a 94% increase in uptake since 2020 and is now part of thousands of farm businesses. The next round of Countryside Stewardship Higher-Tier will open in February, with Mid-Tier following in March.

Countryside Stewardship Plus will reward farmers for taking coordinated action, working with neighbouring farms and landowners to support climate and nature aims. It will deliver the same high environmental ambition previously planned for Local Nature Recovery, including managing floodplain meadows to reduce flood risk and improve biodiversity, restoring and maintaining peatland for carbon capture and storage, and enhancing and managing woodland to mitigate against drought and enhance its resilience to climate change.

The scheme will also be improved so farmers benefit from greater flexibility over when they can apply and how they manage their agreements, with improved access for tenant farmers and increased access to Higher Tier options and agreements.

Elsewhere, following high demand last year, Defra has confirmed it will open applications for the second round of the Landscape Recovery scheme in the spring to support ambitious large-scale nature recovery projects, focusing on net zero, protected sites and habitat creation. This could include projects creating and enhancing woodlands, peatland, nature reserves and protected sites such as ancient woodlands, wetlands and salt marshes.

They involve groups of land managers and tenant farmers, working together to deliver a range of environmental benefits across farmed and rural landscapes. 22 projects began last year aiming to restore nearly 700km of rivers and protect and enhance 263 species.

Today's announcement provides clarity and certainty to farmers, allowing them to make business decisions and cover costs as direct payments are phased out

whilst getting involved in Environmental Land Management schemes. The plans also deliver on the assurances provided by the Farming Minister earlier this month (<https://eur03.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.gov.uk%2Fgovernment%2Fnews%2Fgovernment-to-pay-more-to-farmers-who-protect-and-enhance-the-environment&data=05%7C01%7CHenry.Robertshaw%40defra.gov.uk%7Cdedf0e9ac4bb4933255608dafa306d8a%7C770a245002274c6290c74e38537f1102%7C0%7C0%7C638101781772959773%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTil6lk1haWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&sdata=ds9XKImtV6vVReuJsTtJcldvwNe91Gy2DCV3DgUV4s4%3D&reserved=0>), during a speech at the Oxford Farming Conference announcing increased payment rates.

Further details on the new standards and payment rates being rolled for the Sustainable Farming Incentive as well as information on the future roll out of Countryside Stewardship Plus from 2024 will be available on [gov.uk](https://eur03.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.gov.uk%2Fgovernment%2Fpublications%2Fenvironmental-land-management-update-how-government-will-pay-for-land-based-environment-and-climate-goods-and-services&data=05%7C01%7CHenry.Robertshaw%40defra.gov.uk%7Cfd1d961828ac40443a8608dafebc97b0%7C770a245002274c6290c74e38537f1102%7C0%7C0%7C638102383186706294%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTil6lk1haWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&sdata=t7SM5KndQFJOLqe2gjWQxpFIWrTVrPmz1yyo8BjMzcE%3D&reserved=0) (<https://eur03.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.gov.uk%2Fgovernment%2Fpublications%2Fenvironmental-land-management-update-how-government-will-pay-for-land-based-environment-and-climate-goods-and-services&data=05%7C01%7CHenry.Robertshaw%40defra.gov.uk%7Cfd1d961828ac40443a8608dafebc97b0%7C770a245002274c6290c74e38537f1102%7C0%7C0%7C638102383186706294%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTil6lk1haWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&sdata=t7SM5KndQFJOLqe2gjWQxpFIWrTVrPmz1yyo8BjMzcE%3D&reserved=0>) later today.

## **Straightforward applications**

The Sustainable Farming Incentive has been made as straightforward as possible to apply online for with farmers giving positive feedback over the simplicity and speed of the application.

The 2023 offer has been made as flexible and accessible as possible to enable farmers to get started in the scheme and start to deliver the outcomes for

their business and the environment. These improvements are based on learnings from extensive pilots and feedback to make it simpler, clearer and more workable for farmers.

Over time, it will continue to evolve so that it supports and incentivises farmers to deliver the right combinations of actions, at the right scale, in the right places and in a joined-up way with their neighbours. This will be essential for us to make the required progress towards our environment and climate targets alongside food production.

Harry Baker Cresswell, an agent working with two arable farmers from Northumberland, said:

- “ I work with two holdings which are part of the SFI pilot, neither of which were in existing schemes.”
- “ The application and payment experiences have been good to date, and the objectives of SFI for arable land have been clearly set out.”
- “ SFI is different to previous Environmental Stewardships models in that the option-requirements are much less prescriptive. This is welcome, but does require a little steering to ensure objectives are met – something that Defra has recognised with its SFI Management Payment.”
- “ This is a real step forward in the journey towards enthusing widespread participation in the ELM schemes.”

Kitty Hamilton, a mixed farmer from East Lincolnshire, said:

- “ The big positive of the SFI pilot is the flexibility, which we really like. We were able to retain habitats from previous schemes which we were really proud of. The pilot fits well with our current and planned farming methods, which means it’s gently nudging us towards a more regenerative system.”
- “ The fact that we can layer the standards, and use all of the land on the estate, means that we can generate a good income. Generally I’ve enjoyed

engaging with the learning activities, helping us to upskill professionally and personally within our organisation.”

Robin Milton, a livestock farmer from Exmoor, said:

“ We’ve been on three standards to give the SFI pilot a trial run because we felt it would benefit our business.”

“ The application process was straight-forward and, although the guidance was lengthy, I learned quite a bit and we ended up doing more than we needed to – which isn’t a bad thing.”

Taken together the Environmental Land Management schemes mean there is something on offer for every type of farmer.

For tenant farmers there is range of actions relevant to their holding, especially through the Sustainable Farming Incentive which has been designed with them in mind. Shorter three-year agreements have been introduced with no landlord consent required meaning the risk of entering an environmental scheme has been reduced considerably. There are also no penalties in the event a farmer leaves the scheme early.

Upland farmers can be paid for actions on moorland, grassland and upland peat with over 100 actions in all schemes applicable to them. From this year, farmers in existing Higher Level Stewardship agreements will be able to expand their activities and increase their payments by having a Countryside Stewardship agreement as well.

The 2019 manifesto commitment maintains the annual farming budget of £2.4 billion until the end of this Parliament, with all reductions from farmers’ direct payments reinvested back into the sector. All three Environmental Land Management schemes are accessible to farmers with the budget managed flexibly so that we can achieve the best value for money and deliver the intended outcomes in ways that best suit farmers and land managers.

8

ALASTAIR LYON.  
PLEASE COPY

**TOWN AND COUNTRY PLANNING ACT 1990**

**SECTION 78 APPEAL**

**BY MACTAGGART & MICKEL HOMES ENGLAND Ltd.**

**LAND EAST OF LODGE ROAD, HURST, WOKINGHAM OUTLINE PLANNING PERMISSION FOR THE DEVELOPMENT OF APPROXIMATELY 200 HOMES, OPEN SPACE, PEDESTRIAN AND CYCLE LINKS, RECREATIONAL FACILITIES (CLASS E) AND OTHER ASSOCIATED INFRASTRUCTURE INCLUDING THE FORMATION OF A NEW HIGHWAY ACCESS ROAD FROM LODGE ROAD LOCATED ADJACENT TO THE EXISTING FIELD ACCESS TO BE CLOSED (ALL MATTERS RESERVED EXCEPT FOR ACCESS).**

**APPEAL REFERENCE: APP/X0360/W/22/3309202**

**LOCAL PLANNING AUTHORITY REF: 220458**

**STATEMENT**

**OF**

**Alastair Lyon**

**JANUARY 2023**



## **INTRODUCTION**

- 1.1 My name is Alastair Lyon. My family and I have lived in Lodge Road, Hurst for around 12 years, and another house in Hurst for the preceding 8 years. In that time my 2 daughters have been able to walk to the village school and then more complex travel arrangements for secondary school.
- 1.2 I am a Parish Councillor for St Nicholas Hurst Parish Council.





## STATEMENT

Thank you for giving me this opportunity. I would like to raise only 2 brief but important matters which I experience from living in Lodge Road.

- Traffic volumes in Lodge Road
- Lodge Road footpaths

Firstly - Traffic in Lodge Road.

The rural character of Lodge Road was seen by one of your fellow inspectors in December 2019, as something of value and to be preserved. Traffic levels are increasing, and we now see virtually no horse riders using Lodge Road, which were a much more regular feature 5 or so years ago. There are now occasions when it can take several minutes waiting for a gap in the traffic to leave my drive to join Lodge Road. A further 200 -250 homes each requiring 2-3 cars (each in turn making 2 journeys a day) could add 1,800 more passing vehicles, and this is before we add grocery deliveries, Amazon deliveries, plumbers, window cleaners and many other tradespeople.

If these houses are built, then these vehicle movements are necessary. There is no effective infrastructure in Hurst – it's a rural community, and therefore a lifestyle we all bought into on moving to Hurst.

All residents in Lodge Road will find it even harder to leave their drives, no sane horserider will use the road, and that "rural character" that your Inspector colleague understood the value of, and sought to preserve, will be gone forever.

### Footpaths

There is, in some form, a footpath running from Lea Farm, up past the proposed site and on towards the Northern end of Lodge Road. There is no path at the very most Northern end with some tight bends, no lighting and a fast moving junction.



The section I wish to speak about is the section from the development junction with Lodge Road, heading south to Sawpit Road.

This footpath is a dirt path, screened away from the road by trees. It is unlit and uneven. Whilst fine for a group of leisure ramblers in the daylight, I can assure you it was not appropriate for my school age daughters to use, in the dark or on their own, and certainly would not work for me to push my mother's wheelchair.

From my house, the walk to secondary schools required getting to Twyford. The majority of academic term time takes place in GMT rather than BST. Returning home from school is in the dark therefore. These paths are not suitable. Besides the uneven, unlit surface, with mud and puddles in the winter, it's the personal safety aspect that worried us the most. My wife and I ended up adding to Lodge Road's vehicle movement by driving each morning to Twyford station to drop the girls off in the morning and return, by car, in the afternoon to pick them up again.

The point of raising this matter to you is that whilst all these paths are fine for the leisure rambler or dog walker, they are of no use as a viable means of getting to and from a place of work or education, and it is therefore important to read the developers proposals in that context.

I appreciate that these paths could of course be replaced, by ripping out the trees along Lodge Road, and replaced with a thick swathe of tarmac, but that would be a further nail in the coffin of Hurst as a rural community.

May I close by quoting your colleague, Inspector Philip Major, when when deciding an appeal on an adjacent plot of land on East of Lodge Road, who so eloquently said "Put simply, this would be the wrong development in the wrong place. For the reasons given above I conclude that the appeal should be dismissed."

I trust you reach the same conclusion.

Thank you for the opportunity to contribute to this Inquiry.

Alastair Lyon, January 2023



PLANNING REF: 220458

Land east of Lodge Road, Hurst, RG10 0EG

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 east Lodge Road gated access with required improvements (all matters reserved except access).”

### WRITTEN STATEMENT

Submitted by: Andrew and Jean Dolinski  
34 Martineau Lane, Hurst, Berkshire, RG10 0SF

Date submitted: 31 January 2023

We have lived in our property for 20 years, directly adjacent to, and overlooking the fields subject to this planning application.

We wish to record our strong objection to this unwanted, speculative development, a viewpoint shared by Wokingham Borough Council, Hurst Parish Council and the overwhelming majority of the residents of Hurst and Whistley Green.

However before we talk to you about our lived in experience we wish to refer to planning application 172894, Land at Lodge Road and the appeal decision dated 31 January 2020 (Appeal ref APP/X0360/W/18/3194044). The reasons to refuse 172894 by both WBC and the planning inspector should be applied to this adjacent parcel of land.

In the closing words of the Planning Inspector, Philip Major:

*The proposed development simply fails to address the fundamental shortcomings associated with the appeal site. Put simply, this would be the wrong development in the wrong place.*

Prophetic words which have a direct bearing upon this application.

If we, the residents of Hurst and Whistley Green are to have any faith in the planning process, and the judgements of Planning Inspectors, it is imperative that the findings of Philip Major are applied to this application. We reiterate, ‘*the wrong development in the wrong place*’. Case closed!

The reality is that over the next two weeks the developers and their team of barristers and ‘paid for experts’ will seek to paint a vision that this is indeed ‘the right development in the right place’. Such vision is not borne out by the lived in experience. Philip Major listened, and he agreed. We urge that you listen to the concerns of the local residents, the parish council and the borough council and come to the same conclusion. Please do not be misled.

Hurst and Whistley Green are semi rural villages with few quality services. You will have heard repeatedly that there is no doctors surgery, there is only one small convenience store/post office, there are no secondary schools within walking distance and transport links are poor. The households have an over reliance on their cars. These are irrefutable facts which no highly paid PR company, consultant or barrister can refute.

### Impact concerns

Let us be clear, the proposed development is for the “wrong houses, in the wrong place”.



The residents of Hurst and Whistley Green settlement are united in condemnation of this flawed speculative development proposal.

We strongly believe that WBC are best placed to ensure that "right houses are placed in the right place". Houses should be located where they are needed, in a location that is sustainable and which has the lowest environmental impact. The heart of the semi rural village of Hurst is not such a location.

The developers have not properly assessed whether there is a need for their houses in this semi rural location. Where is the local employment which would not require the use of private cars to reach?

**Why then have the developers chosen this site? For no other reason than commercial gain. Do they really care about the impact of adding 200 more homes to the village (a 34% increase), adding 480 more residents and at least 400 more cars.**

### **Personal amenity**

From a personal perspective my wife and I object to the loss of a private personal amenity which we have enjoyed uninterrupted for twenty years. The developers are seeking to replace a field grazed by twenty horses and three donkeys with a net work of roads, paths and 200 houses. This overwhelming development, situated to the rear of our property will have a profound impact upon both our physical and mental well being. This is contrary to the Human Rights Act 1998 (Article 1 of the First Protocol). We have a legal right to live our life privately, and to enjoy the family life we have been accustomed to for twenty years. The development would destroy the open aspect of our property and therefore deprive us of our cherished personal private amenity.

The development of the fields would result in a loss of an important bio diverse rural habitat in which all manner of flora and fauna cohabit and which adds to the semi rural aspect of Hurst. The planet needs to preserve such areas and it must not be lost for speculative commercial gain. The generations who follow will not forgive us if that was allowed to happen. Please have the foresight to listen to them.

This developer cannot be trusted to protect the local ecology. To demonstrate why we wish to take you back to the events of March and April 2021:

**5 March 2021**



The developers undertook a topographical survey of the site.

Two mature oak trees block access to the main site from Lodge Road.





**10 March 2021**



Two mature Oak trees are felled at the north west corner of the large field.

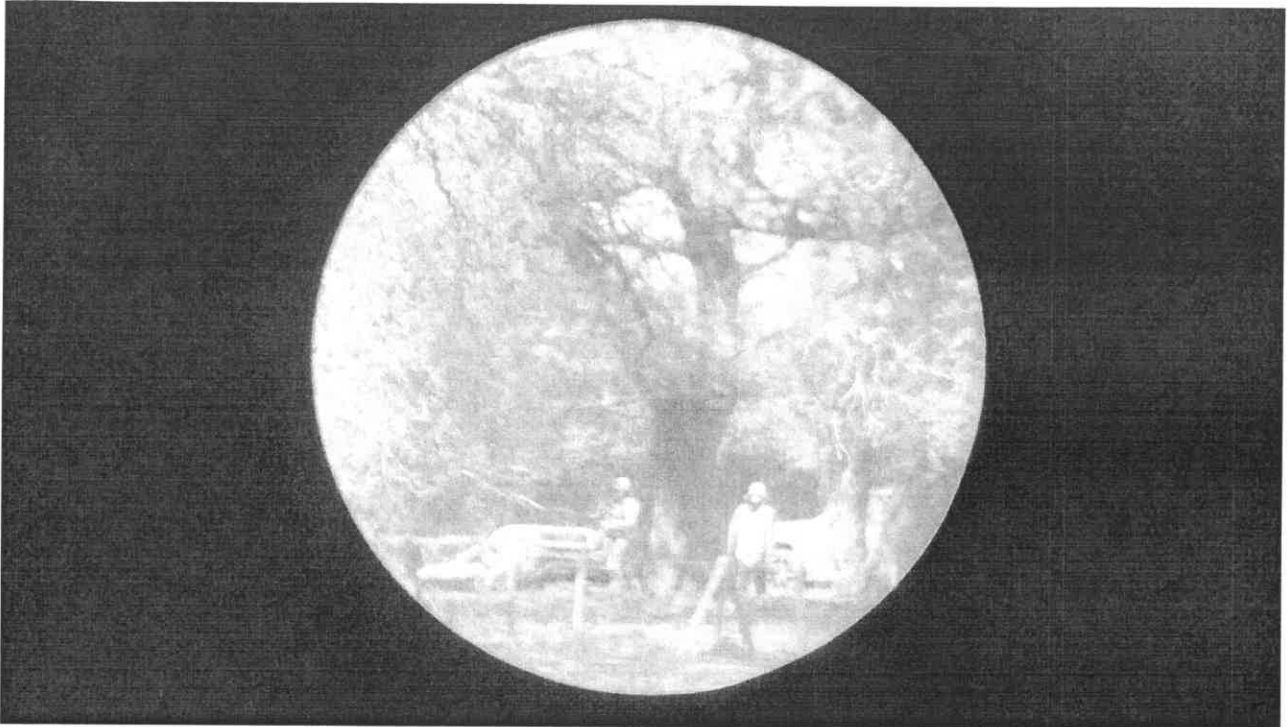
These trees stood in the way of providing an access road into the large field from the small field which has gated access to Lodge Road. This ecological vandalism predated the imposition of a TPO by a few days.

**15 April 2021**



Further ecological vandalism then took place within the small field adjacent to Lodge Road, which had lain largely undisturbed for many years. Workman were present from sunrise to sunset removing a container, felled trees and other log piles which had accumulated over the years.





The workmen used a wholly inappropriate (destructive) remote controlled scrubland clearing machine (eg McConnel Robocut). These are generally used on large civil projects to cleanse the land of fauna and vegetation. We observed this machine being used destructively for hours on end. No creature in that field would have been spared.

### **22 April 2021**

A week after cleansing the field adjacent to Lodge Road an initial ecological site visit was conducted by the developers environmental consultants. Unsurprisingly they concluded that there was little biodiversity and ecological value of note. Those who observed the wanton destruction of the previous week would not be surprised by such findings.

Please do not be fooled by the misleading Ecological Impact Assessments submitted by the developers nor of their stated environmental credentials.

The importance to maintain the semi rural aspect of Hurst must not be underestimated. At night my wife and I often hear the sounds of nocturnal wildlife. These and other sounds are what makes living in Hurst unique and desirable. Not the sound of an additional 200 households and their cars and pets. Please do not deny future generations such experiences.

### **Sustainability**

Clearly the developers do not know the area, for they should know the difficulties that families currently have finding secondary school places for their children, and when they do find places, the difficulty they face in finding transport to take them there. Walking and cycling to secondary schools is almost impossible, especially in the depths of winter.

They also have no idea how difficult it is to get an appointment at the over subscribed GP practices, none of which can easily be accessed other than by private car.



## Invitation to visit

My wife and I cordially invited you to visit our home which directly abuts the southern boundary of the proposed ill conceived and unwanted development. You accepted and we look forward to welcoming you.

We invited you to arrive by sustainable transport. Please do not arrive by car. Experience for yourself the tortuous walk from either Winnersh or Twyford train station. If you are lucky it might not be cold and wet. If it is, be prepared. Wear wellington boots as you will be forced to walk through surface water on flooded roads or slippery muddy foot paths. Welcome to our semi rural location.

If you arrive early in the morning, or in the evening, bring a torch, and for your safety wear high viz clothing. The walk is not for the faint hearted at best of times. We hope you are a fit person. Whilst you undertake the 40 minute brisk walk consider having to endure that walk day after day, rain or shine and in particular in the depth of winter. Perhaps you have mobility issues, or are of a certain age. You might not be able to walk such a distance or negotiate roads without pavements with cars pounding alongside you. Is there an alternative? Yes, the bus.

Both train stations are served with a local bus service. Erratic and inconveniently timed so as not to allow residents to use it for their daily commute, nor secondary school children to go to, and return from schools outside one or two services. Woefully inadequate especially for those with pre or after school activities.

The inconvenient timings of the buses make trips to hospitals, dentists and doctors impractical. If you can get an appointment that is.

Shopping by bus is also an impractical solution. Miss a bus connection and the next bus may not be for another hour or more, or at all.

Oh, don't bother on Sundays. There is no service!

Perhaps you cycle. If you do, take your cycle on the train and come to our house by this sustainable means. This is after all the vision such developments propose. Arrive at Winnersh or Twyford station and embark on a life threatening cycle along narrow roads, hounded by impatient motorists. There is no network of safe cycle routes here. As you cycle consider the secondary school children which the developers expect will cycle to school. The boys to Forest School in Winnersh, the girls to Holt in Wokingham. Long unlit journeys without safe cycle paths. Some though will need to go to Piggott in Wargrave or Waingels in Woodley. Look at the map and see how distant these schools are and how involved and tortuous those cycle trips would be. Cycle those routes and see for yourself how dangerous those routes are, especially in inclement weather or on a dark winters evening having attended an after schools club.

This is the "lived in" reality of this unsustainable location. The residents of this area know what the reality is. It is a far cry from the fantasy vision being put forward by the developers.

The Inspector involved in the recent Sawpit Road planning appeal (No. APP/X0360/W/21/3280255) woefully disregarded the residents "lived in" experiences and misguidedly allowed the appeal. In particular we highlight paragraphs 50 to 53 of the judgement, and his comments therein which are erroneous, mistaken and not in keeping with reality. Please do not be misguided. Be informed.

Both Hurst Parish Council and Wokingham Borough Council oppose this development on numerous grounds. Lack of sustainability is an irrefutable objection. They fully agree that the ill-suited imposition of 200 homes on this land is wholly inappropriate. The wrong homes in the wrong place. These authorities know their communities. They are best placed to ensure that the right homes are built in the right place. Locations where communities can thrive with safe sustainable transport. Locations where residents are not placed at risk. Locations where children can happily walk or cycle to school without fear.



Having arrived at our property, by foot, by bus, or by cycle we will rejuvenate your spirits and aid your recovery from your ordeal with a restorative cup of coffee or tea. You will then be best placed to observe from a "lived in" point of view why this field means so much to so many.

You will see why the field is essential as a separation between the distinct and historically independent communities of Whistley Green and Hurst. Together, these are not a single village or community. The development would not fill a void within a village, it would seek to inappropriately join these two communities together, by way of a wholly inappropriate, urbanised estate. 200 new homes shoe horned into a combined community of 400 homes is preposterous.

You might be lucky that some wildlife has survived the carnage currently being caused by the mammoth archaeological dig. Why this has been allowed when planning is currently disallowed is a mystery. It is obvious that the ecological equilibrium has been disturbed. Our field is bereft of its long term residents, the twenty horses, ponies and donkeys. Even the birds, rabbits, foxes and deer are now largely in hiding.

If evening sets in, hopefully calm will ensue, and with the dark skies currently to our north, you will be rewarded with an abundance of bats. Part of the nocturnal community that have lived in and adjacent to the field for centuries. Is such habitat to be replaced with houses, people, cars, cats and dogs, intrusive lighting and noise pollution? Come and experience our "lived in" experience before it is lost forever. Never to be experienced by future generations.

As we say good bye to you we will contemplate our future and those of our neighbours. Our community is at risk of being destroyed. The future of our community rests in your hands. Be informed, do not be mislead.

### **Mental Health Impact Assessment**

We wish to end by asking why have the developers not provided a Mental Health Impact Assessment? Do they not have a duty to consider the effect this proposal has had, and will continue to have, on our mental well being, an issue which we believe you also have a duty to consider.

Our personal amenity is in danger of being taken away, something that we have enjoyed for the past 20 years. An amenity which has a profound impact on our health.

Andrew & Jean Dolinski

34 Martineau Lane  
Hurst  
Berkshire  
RG10 0SF

[andrew.dolinski@icloud.com](mailto:andrew.dolinski@icloud.com)





Paul Martin

35 Martineau Lane

Hurst

My name is Paul Martin. I moved into 35 Martineau Lane in February 1996, my house overlooks the proposed development. I also rent an allotment behind my house. The allotments are between Martineau Lane and the proposed development, with access from Tape Lane.

I feel the proposed development, will have a huge effect on the people of Hurst, but even more so on the wildlife that use the field. The field is surrounded by ditches which link into a network of other ditches throughout Hurst, the river Loddon and nearby Lavell's Lake nature reserve. These are the highways of our amphibian animals.

Throughout the year the field is used by large flocks of birds. When it is wet, large shallow ponds appear which attract large number of wading birds. In the autumn there are large number of geese can be seen feeding and getting ready to migrate. In winter, there are native gulls, Terns, Rooks and jackdaws. In the spring other migrant birds return, and as we move into summer House Martins return build nests on the surrounding properties. House martins only feed on insects, which they find in abundance over the field.

At night we get several bats, possibly from the colony at the Dolphin School. Also at night we get hedgehogs which have successfully breed on the allotment. Unfortunately for the allotment holder, their favourite food is beetles, which that can find amongst the horse dropping on the field. We also have pheasants running up and down the field, again with young in toe.

I often see Muntjac deer in the early morning or evening, and foxes with their cubs. When St. Nicholas and Dolphin schools visit the allotments, I can usually find one or too toads that are in abundance. I spend a lot of time on my allotment, and every day I see something different on the field.

All these animals depend on the field for food and shelter. To build on it would destroy a complete ecosystem.





## RESIDENT STATEMENT

APP/X0360/W/22/3309202– Land East of Lodge Road, Hurst

### Drainage & Flooding

- My name is Jonathan Norris. As a Hurst resident living in Martineau Lane for almost 30 years I speak today with some experience as to the fragility of the Hurst infrastructure in coping with localised flooding and poor drainage, and significantly its impact upon day to day life within the community.

### Introduction

- Hurst is wholly unsustainable for a variety of reasons, my experience of living in Hurst is that drainage and flooding is a common denominator to so many aspects of everyday life. So let me begin by putting this into context.

#### For example:

- Whether travelling to work, school, shopping, attending health centres, using recreational facilities, visiting friends and family outside the village centre – all require the use of roads, be that by car, taxi or exceptionally by bus; and in some instances for the purpose of onward travel by train. Invariably the necessity to carry some form of luggage or shopping preclude walking or cycling irrespective of weather or road conditions.
- In the absence of contiguous footpaths, unlit country roads, surface water from overflowing ditches, road spray and soft verges are all contributory factors against walking or cycling for any other reason than well-timed leisure purposes, but in any event are thwart with danger.

### Sewage Flooding

- With regard to sewage flooding this too is very much a historic and ongoing issue attributed to seasonal increases in surface water ingress into the sewerage network which in turn is unable to cope with such large spontaneous increases in both foul and surface water.
- Consequently there are frequent instances of groups of houses within the centre of the being subjected to:
  - Sewerage flooding causing manholes to lift and discharging sewage into gardens and garages;
  - Manholes being pumped out by tankers;
  - Ground floor toilets backing up;
  - Flooding necessitating deep cleaning;
  - Debris clearance;
  - Slow flowing / gurgling drainage.

**RESIDENT STATEMENT**  
**APP/X0360/W/22/3309202– Land East of Lodge Road, Hurst**

- For example, this month there have been instances of sewage flooding in Sawpit Road, School Road, Tape Lane, Broadwater Lane, Lodge Road and in Whistley Green.
- Many of the problems experienced by residents have been attributed to foul and surface water pumped via the Thames Water Sewage Pumping Station (SPS) in Sawpit Road under pressure through a “foul rising main” across the west side of the Appeal site adjacent to Hatchgate Ditch and into Lodge Road at (node 2801) where it is joined by water piped from the toxic waste remediation site on the west side of Lodge Road and from where it continues northwards downstream through Whistley Green.
- It is interestingly noted that the Appellant only makes reference to proposed site flow rates, not the combined flow rates or volumes from all upstream sources connecting to node 2801; just from the development site. Which given that Whistley Green already suffers from sewage flooding and in the past month at that, it is of little comfort to suspect that 200 additional houses will inevitably only make flooding worse.

In noting that the Appellant concedes on page 21 in para 8.5 of the *Flood Risk Assessment and Drainage Strategy* that ...

*“8.5 There are no suitable connection points to the south of the development site. If there were, it would not be appropriate to send foul flows to them as they flow to the existing pumping station in the village centre, which would have been designed only for the existing flows and loads that it receives.”*

... hence it seems surprising that whilst the Appellant acknowledges that by design that the Sawpit Road SPS lacks surplus capacity and yet is of the opinion that the connected downstream network capacity would be more than capable of supporting an additional 200 houses given that in all probability that only 50% of about 570 houses in the village centre use node 2801 by design given that other properties use an alternative network route to the north along Broadwater Lane.

Given the age and design of the existing sewerage network it begs the question as to when and where has this extra network capacity come from to now support new 200 houses.

### **Surface Water Flooding**

- Surface water levels are gradually rising year on year in Hurst whereby, for example, tree lined ditches alongside Lodge Road and adjacent to the Summerleaze Remediation site (containing toxic waste) have become much wider with trees now growing in standing water and with the passage of time some have taken on the appearance of mangrove swamps of fallen and decaying trees.

**RESIDENT STATEMENT**  
**APP/X0360/W/22/3309202– Land East of Lodge Road, Hurst**

- The development site is renown for its high water table, for being waterlogged and its recognisable year on year display of large areas of surface water adding credence to Environment Agency flooding mapping, despite perhaps at times not being quite so up to date, but nevertheless an accurate representation of a waterlogged field framed on two sides and coloured coded to varying degrees as being “at risk” of flooding ditch locations.
- With the introduction of “heat maps” as recent as 2018 (ref: *WBC SFRA 2020 Appendix A.12*) it would appear that climate change is impacting upon surface water levels.
- For example, tree lined ditches alongside Lodge Road and adjacent to the Summerlease toxic waste remediation site have become much wider with trees now growing in standing water and with the passage of time some have taken on the appearance of mangrove swamps of fallen and decaying trees.
- Such trees standing in water logged ground frequently become unstable, fall and block roads resulting in road closures, diversions and power cuts.
- The impact of climate change on Hurst’s environment is becoming self evident in many areas, such that the Appellant’s proposed raising of floor slabs and discharging water onto neighbouring property is simply not a convincing solution for mitigating flood risk.
- My point here is that flooding and drainage has a direct impact upon every aspect of life and the environment way beyond this proposed development site, and cannot simply be excluded from consideration on the back of a Statement of Common Ground pertaining to the Appeal site, whereby it is simplistically stated that ...

*“There are pockets of the Appeal Site that historically suffer from surface flooding however the proposed drainage strategy addresses this and provides appropriate mitigation.”*

... it is abundantly clear, and I refer to *Drawing 2101015-0500-01 Drainage Strategy Surface Water* that this strategy is without any substance or credibility. To merely state ... *“Connection to existing ditch. Location to be confirmed at detailed design stage”* and repeat it 4 times alongside a proposed modification to the alignment of the Hatchgate Ditch rivercourse is hardly an award winning implementation of a rural SuDS system – it might have as well stated ... “and then a miracle happens”

- And yet, ironically, here we are today at an Appeal that could sanction a disproportionate 34% increase of 200 houses in the absence of an intelligible drainage solution.

The drainage strategy as proposed is simplistic insofar as the Appellant is wholly reliant upon discharging water away from the development site and thereby compounding historic flooding elsewhere. Such an approach affords no benefit and is without any credible risk assessment to the Village infrastructure or the Community.

**RESIDENT STATEMENT**  
**APP/X0360/W/22/3309202– Land East of Lodge Road, Hurst**

... notwithstanding that the Statement of Common Ground goes on to state:

*“Following submission of revised drainage information, the Lead Local Flood Authority removed their drainage objection (subject to appropriate conditions) on 20 May 2022 although there is a holding objection from the Environment Agency that is presently subject to negotiation and may be resolved by conditions 5 and 10.”*

Hence I have to question WBC’s rationale and justification for agreeing to such a Statement of Common Ground at that time, given the Environment Agency’s justifiable ongoing flood risk objection, has seemingly now existed for over 8 months.

That aside, I refer to the recently produced by Pell Frischmann (*CD 8.9 Appellants Flood Risk PoE*) that states in conclusion of the report in para 4.1.6 that ...

*“Any areas of localised flood risk or residual risk could be secured through appropriate condition, such as measures outlined in the illustrative layout, comprising suitable standoff from the watercourse, and raising of finished floor levels above current ground levels”.*

... strangely it would appear that the Appellant is of the opinion that flooding within the development site can be mitigated by simply raising floor slabs above ground level and by discharging attenuated water outside of the development area into ditches onto neighbouring land; indeed land that has been verified by the Land Registry and confirmed to be outside of the Appellant’s curtilage and owned by a number of Martineau Lane residents and Wokingham Borough Council (See attached)

- I have a significant concern that in the event that this Appeal is upheld that the proposed Environmental Agency Condition (*Environment Agency Letter dated 23/12/22*) regarding the introduction of *“a minimum 8 metre buffer zone on both sides of Hatchgate Ditches [albeit there is only one such named ditch] is to be agreed”* would not be feasible due to what I believe to be a presumptuous intrusion on neighbouring third parties.
- However, the very suggestion that one half of an 8 metre buffer zone be imposed upon me and my neighbours is wholly unacceptable and in any event would not afford us any defence from an increased risk of flooding from surface water discharged into any ditch adjacent to the south side of the Application Site Boundary or the west of Hatchgate Ditch.
- With 400+ letters of objection citing many instances of flooding, be that just surface water, surface water ingress into foul sewers and culminating in sewage flooding; not to mention businesses forced to temporarily close, road closures impacting upon local travel, scant bus services being diverted where limited road widths permit or simply just cancelled, trees rotting in standing water and falling onto power lines; it is extraordinary that the impact of flooding and drainage on any community should be excluded from consideration due to an ill considered Statement of Common Ground; to which as a resident I disagree with.

**RESIDENT STATEMENT**  
**APP/X0360/W/22/3309202– Land East of Lodge Road, Hurst**

- The frequent flooding of roads due to overflowing river courses (from Black Swan Lake, River Loddon, Twyford Brook, Hatchgate Ditch & other unnamed rivercourses) and by rural surface water runoff collectively contribute to frequent road flooding resulting in road closures and travel restrictions *e.g.* along Sandford Lane, Lodge Road, Whistley Mill Lane, Broadwater Lane, Wards Cross, Hinton Road, Tape Lane and Sawpit Road, Islandstone Lane and Wokingham Road and others.
- The notion that Hurst can grow as a sustainable community through enforced and disproportionate housing development mitigated by the Appellant raising floor levels above ground level and by introducing 8 metre standoffs in order to mitigate flooding is less than convincing, as stated in a seemingly last minute desktop piece of research produced by Pell Frischmann (*CD 8.9 Appellants Flood Risk PoE*).
- As for the viability of implementing a rural SuDS network solution in support of this development site and in the absence of a wider rural drainage infrastructure to connect it to, this development is simply not sustainable and constitutes a flood risk to the wider community of Hurst. As alluded to in (Drawing no: 2101015-0500-01 Drainage Strategy Surface Water) this proposal lacks any substance or credible design detail.
- In conclusion, I reassert that Hurst's drainage and flooding issues will be exacerbated by the Appellant's notation that raised floor levels and by offloading attenuated water a matter of yards away onto neighbouring property is not a credible solution to a waterlogged community.





Certificate Date: 26 JUN 2006  
Certificate Time: 00.00.01  
Certificate Ref: 057/F00FPFB

Property

Land tinted pink on the plan attached to the application and described in form SIM as  
LAND AT THE REAR OF, MARTINEAU LANE, HURST, READING,  
WOKINGHAM, RG10 0SF.

**Result**

The index map has been searched in respect of the Property with the following result:

Plan reference	Title No.	Registered Estate or Caution	Notes
Not Applicable	BK320011	Freehold	WBC
Not Applicable	BK323531	Freehold	30
Not Applicable	BK323566	Freehold	32
Not Applicable	BK323968	Freehold	36
Not Applicable	BK324233	Freehold	38
Not Applicable	BK324265	Freehold	40
Not Applicable	BK324780	Freehold	34

\*\*\*\*\*

You will notice that more than one title affects the land searched. Normally we would supply an illustrative plan showing the registrations affecting the Property but, in this instance, no plan has been supplied. This is because, in order for the search service to operate efficiently, it is presently restricted to searches of a routine nature. Searches of large areas or areas of complex registrations, such as this, are presently outside the scope of this service.

Continued on page 2

Your Reference:  
PAS NORRIS

Key Number:  
1352083

Any enquiries concerning this certificate to be  
addressed to: WOK & BRACKNELL

HERRINGTON & CARMICHAEL SOUTHORNS  
DX33501  
WOKINGHAM

GLOUCESTER DLR  
TWYVER HOUSE  
BRUTON WAY  
GLOUCESTER  
GL1 1DQ

Tel. No: (01452) 511111



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DITCH

MARTINHEAD LANE

Allotment Gardens

ORIGINAL 1978  
HEDGE LINE  
ON BK154069

BK323968

INTERSECTION OF  
HEDGE LINES

40

38

36

34

32

30

46



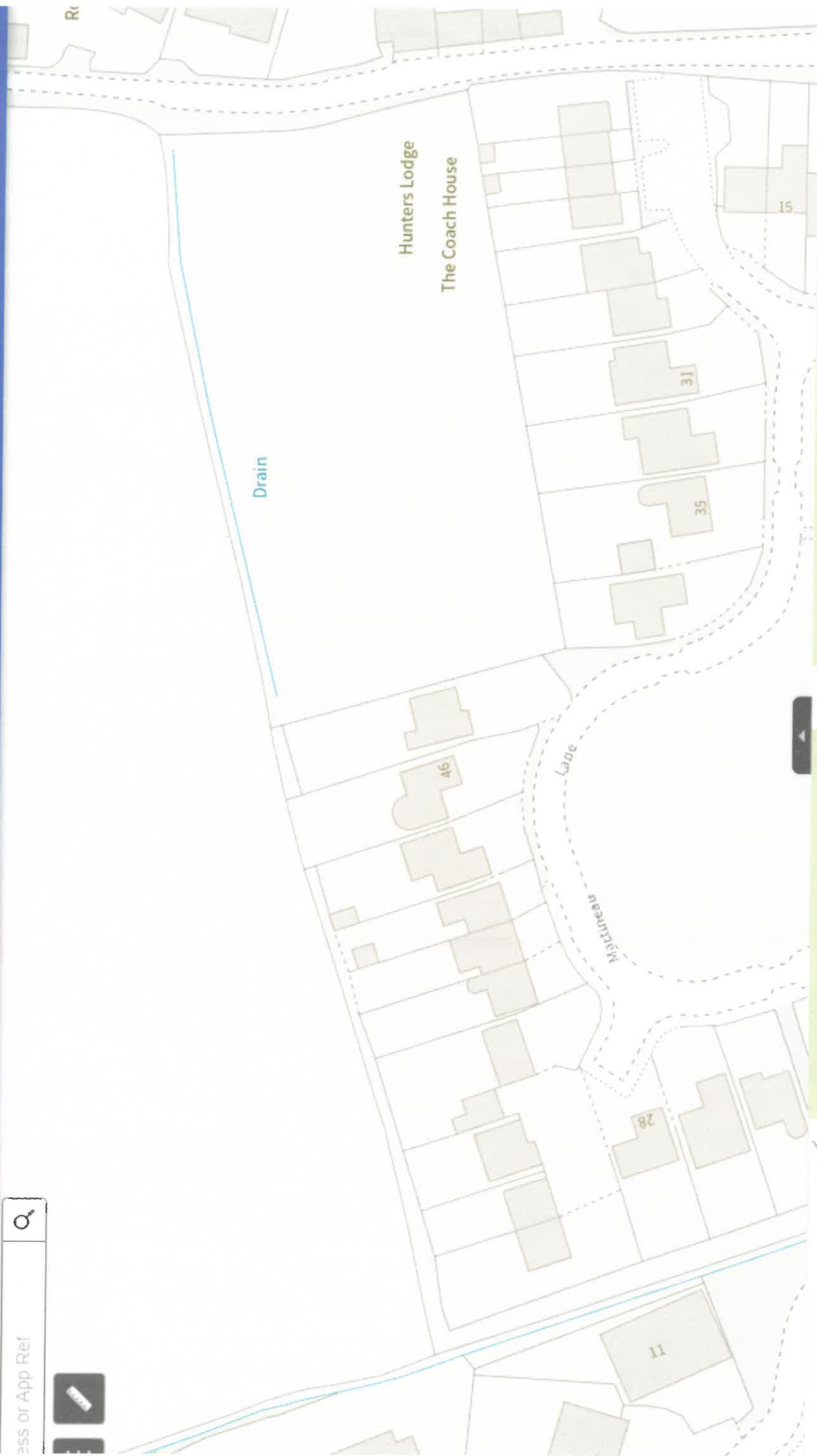
**WOKINGHAM**  
DISTRICT COUNCIL

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Address or App Ref







**NOTES**  
 This drawing has been prepared on the basis of information provided by the client and is not to be used for any other purpose without the written consent of the author. The author shall not be held responsible for any errors or omissions in this drawing or for any consequences arising therefrom.

**KEY**  
 Application Boundary (B.20(a), 24.17(a))

1. DESIGN: **BOYER**  
 2. DATE: 21.12.2006  
 3. SCALE: 1:1000  
 4. SHEET: 1 OF 1

Author: **MacLaggan & Wickett**

**Boyer**

Land East of Lodge Road  
 Hurst

Application Boundary Plan

Scale: 1:1000  
 Date: 21.12.2006

Author: **MacLaggan & Wickett**





**Statement for Planning Appeal. Planning Ref 220458. Land Adjacent to Tape Lane/Lodge Road, Hurst**

**Overbearing Impact of the Proposed Development** 31.1.2023

My name is John Vimpany. My home is at the Wards Cross entrance to Tape Lane. I have lived in Hurst since 1974. My family first moved to this area in the late 1940s when my father flew in civil aviation from Woodley aerodrome. My three children attended the village school. Sometime ago now I served for five years as a member of the Council of the University of Reading.

I am very attached to Hurst and privileged to have many friends here who share similar views on the issue that we are now faced with - one which has the potential to greatly affect the quality of our lives.

My comment is informed by the 'Guidelines for Valid Objections' suggested by the Wokingham Borough Planning Website. It lists several, such as Highway and Safety, Local and National Planning Policies, Previous Planning Decisions and Wildlife and Ecological factors. This Development would conflict with all these and more.

But the main 'material consideration' in support of objections listed by the Council is, unsurprisingly, 'Overbearing Impact' (repeat 'Overbearing Impact'). This scheme would, at a stroke, add around 50% more residents to the settlement area of Hurst and on protected green space, resulting in yet more suburbanisation of a semi-rural community.

The consequences of 'Overbearing' development will be unsustainability of the community services offered in the locality and traffic and people movement problems generally, problems that are already evident. To me, 'Overbearing Impact' is a fundamental reason that enables the Inspector to dismiss this Appeal.

Politicians are now suggesting that future planning legislation will take more account of the views of residents whose communities would be affected by inappropriate development. At present, we feel Hurst is viewed as a business opportunity by landowners and developers. We need you, the Inspector, to respect our views and agree that the Overbearing Impact of this proposed large-scale scheme is, in itself, sufficient reason to dismiss this Appeal.



## Geoff Manning

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**From:** Geoff Manning <gtmanning@btinternet.com>  
**Sent:** 27 January 2023 11:57  
**To:** 'Geoff Manning'  
**Subject:** Appeal

Appeal Statement for

WBC 220458

### Statement by Geoffrey Manning

This statement I shall read concerns the flooding of said field and the adjacent areas so affected.

I have lived at West Hope, Wards Cross, for 23 years and have a commanding view across and down the length of the field which is subject to this Appeal.

I would remind everyone that the last Appeal for an Equine Centre was rejected and the INSPECTER DECREED THAT THE FIELD SHOULD REMAIN A GREEN LUNG BETWEEN HURST and TWYFORD.

Every winter this field floods to a greater or lesser extent to that seen this winter. With more than the average rainfall in a few weeks there is a greater area of flooded land despite the upheaval suffered by the ground investigations. There have been two very dry summers where the water table had fallen to a very low level, but once the water had percolated its way down the field rapidly flooded as can be seen on the drone photos. The extent of the water is in the usual areas and has now entered Godsals field, that is the field between my garden and the Appeal field. It has filled the ditch at the bottom of my garden and is now seeping into my garden. There is now a fine dividing line between further encroachment should we get further rain, thus making the area under water unusable.

The EA map shows the ditches they are responsible for, which are along Lodge Road and Sawpit Road, WBC are responsible for Tape Lane, thus all other ditches around this field are the responsibility of the land owners. The field boundary's are delineated by the time honoured method of ditch and bank, which method dates back to various Enclosure Acts of the 18<sup>th</sup> cent. In my time here the land owners have never made any effort to clean and maintain their respective ditches. This would help in the flood water draining down to the Loddon and its tributaries, however in recent years the Loddon had been neglected and in places almost stagnant with reeds and other aquatic growth.

This brings me to my situation, my garden is under water most years, which when the level is sufficiently high runs past my garage and into the Cricketers front garden and then into the road ,the A321. In fact all the properties in the Tape Lane, A321 and Hogmoor Lane areas suffer flood water to a greater or lesser extent. The A 321 is renowned for flooding and becoming impassable between Tape Lane / Hogmoor Lane and Whistley Green . See the photos. The recent development at Whistley Green is a classic example of putting houses in a flood prone area, where ditches were filled in and construction was halted while expensive ground works were undertaken and very large underground holding tanks constructed. How long before they silt up and have to be opened up? Wrong sort of development in the wrong place.

20 years ago when we digging the foundations for my garage we found that there had been a ditch running down the side of my garden and along the back of all the houses in Tape Lane on my side, but had been filled in with a clay pipe land drain at its base. No one knew when this infill had taken place , but as the house is post second world war it was assumed the in fill was done at or about this time. This set me wondering, that, if in the past there had been a ford on what is now the A321 to allow the ditch in Hogmoor Lane to drain through to the ditch on my side and thus down to the ditch on the Appeal field. This would probably have alleviated some of the flooding problems in Hogmoor Lane in the past.

Hurst seems to suffer from a unique problem of being a little land locked village, when Castle Hill is flooded on the bend into Lodge Road, the A321 between Tape Lane and Whistley Green and again at Twyford Station. Going the



other way to Wokingham the various roads between us can also be flooded . We can then observe frustrated motorists doing three point turns trying to find a way out and at times over the years there hasn't been a way out, or in.

This brings me to the next point, in a village with no infrastructure such as Doctors, Dentists, Chemists, Shops, or bus service we are isolated, seriously isolated. To get emergency services in or out is a non starter. Thus to be blunt, this is not a sustainable situation and needs resolving before one more house is ever built here. It is foolhardy to consider building on this field, rain is rain and is not selective where it falls, thus if you cover that field in bricks and mortar there will be less area for rain to drain into and with the already inadequate ditches and foul water drains in the village then the problem will get worse. Seriously worse .Building here will only cause further problems in years to come which will be costly and time consuming to resolve.

This little unstainable village has suffered lack of investment in infrastructure since time immemorial and no authority seems interested in resolving our problems, just to build more houses and hope things might turn out alright, or that they will be retired and collecting their pensions before things go wrong. Which they will.

It has been noted that during the recent freezing weather the foxes that live around the field have been out in daylight looking for drinking water and food. What will their fate be if the field is covered in houses? Is no one concerned about their sustainability?

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One last point almost every one that lives in Hurst has driven here today in their own cars, there is no bus service. Is that sustainability?

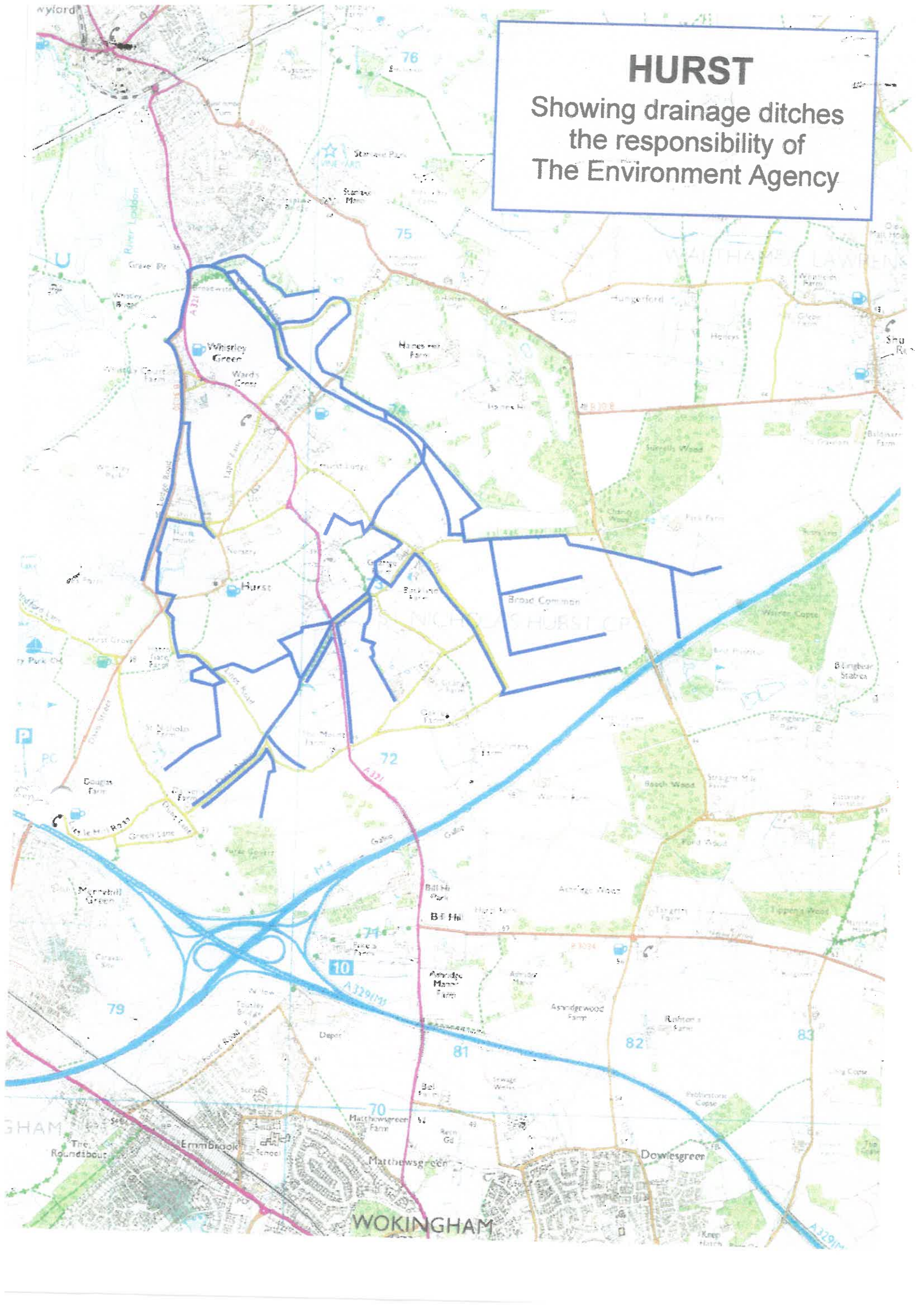
PA Mearns  
G.A. MANNING

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# HURST

Showing drainage ditches  
the responsibility of  
The Environment Agency







1



VIEW OF A321 TOWARDS FINYFORD FROM WEST HOPE



VIEW OF HOBMOOR LANE FROM WEST HOPE





3 VIEWS OF BACK-GARDEN OF WEST HOPE





VIEW WEST HOPE ACROSS  
DITCH INTO GODSALS FIELD

3



VIEWS OF BACK GARDEN OF  
WEST HOPE





4



2 GENERAL VIEWS OF GODSALL FIELDS, FOREGROUND





5



2 VIEWS OF DITCH AT BOTTOM OF WEST HOPE'S GARDEN



2 GENERAL VIEWS FROM UPSTAIRS



14

**Huw Griffiths**

**Address at Planning Inquiry for the Land to the East of Lodge Road.**

**Starting 31<sup>st</sup> January 2023.**

**Good morning,**

**My name is Huw Griffiths I have lived in Hurst & Whistley Green over the last 25 years, I'm a Chartered Surveyor with 30 years in regeneration, development, and construction, exclusively on brownfield land.**

I have come along today to find out why we are all here: what's changed?

The NPPF defines what Sustainable development needs to be and how this is established through the creation of local Development Plans, Policies etc.

Wokingham have done this with extensive consultation, debate, and scrutiny, with various stakeholders', communities, landowners the public at large and ultimately the Planning Inspectorate and the result has consistently been:

- the Local Plan is clear the site is not suitable for Sustainable Development
- the previous Local Plans were clear that the site is not suitable for Sustainable Development.
- the emerging Local Plan is clear the site is not suitable for Suitable Development.
- The Planning committee was clear that the site is not suitable for Sustainable Development. On several occasions.
- The Planning Inspectorate have agreed it and since reinforced the site is not suitable for development.
- Pretty much all the residents of Hurst have made it clear that they don't believe the site is suitable for development.

This is not a view that has been formed by a bunch of NIMBY's from Hurst but this is a view of the whole Borough and has been through a thorough democratic process of; proposals, consultation, feedback, scrutiny and agreement.

This must be respected if there is any hope for the planning system.

If the Local Plan concludes its not a Sustainable development site, then it cannot be a sustainable development because the Local Plan is an instrument of the NPPF. I struggle to see how this can be disputed and I don't see the need for further debate on the point – this has been debated endlessly in the past and the answer has always been clear – IT IS NOT

Many of us didn't like Brexit (that dragged on too) but it was democratic.

It seems now the fate of the site will now be rest on the relevance of a small, short fall in the 5 Year Housing Supply – but let's be clear – this is a timing issue not a material factor in Wokingham meeting its Housing Need.

Wokingham are not failing they are significantly in advance of where it should be, as Mr Ian Church points out in his Proof of evidence:

*“Housing completions against the Core Strategy local plan have exceeded the requirement by 1,727 dwellings in the period 2006/07 to 2021/22, significantly boosting the delivery of housing to date. Adding projected completions over the remaining plan period to 2026 would see total completions reach 15,702 compared to the total requirement of 13,230, a boost of 2,472 dwellings or 18.7%.*

It seems that because Wokingham have over delivered 1727 homes and will ultimately deliver 2,470 additional new houses all its planning Policies are “Out of Date”, and the decision is therefore down to whether the site can be delivered Sustainably and without Significant Harm.

Development Sites simply don't become Sustainable and Harm is not reduced because of of the 5 yrs. HLS.

I think Planning history [ Core documents] has well established the site is NOT CAPABLE of being developed Sustainably and its development causes Significant Harm that can't be offset with any Benefit. Regardless of timing of housing delivery.

In the 2019 Appeal (Ref: APP/X0360/W/18/3194044) on the Adjacent Site along Lodge Road where the Inspector Philip Major pointed out in Para 9 onwards:

He found it difficult to accept Policy CP17 was entirely out of date due to change in housing numbers, in Para 10 & 11 he concludes that its it is not the most important matter in determining the appeal and ultimately the titled Balance should not apply. Para 12. To state the same about Policy C9 (scale & nature of settlement that sets out the scale and locations of developments should not be considered out of date due to housing numbers as with CP11 (Development outside the settlement) and Policy CC02 (Development Limits).

In para 15, he concludes he cannot accept the main baskets of Policies (many that same the current appellant is claiming are out of date) are out of date as a result of Housing numbers changing as they have little influence on these Policies.

In para 16. He points out this decision is support by a High Court Judgement.

Summing up in para 50 & 51 Mr Major says

50. Although it is apparent that the proposal is not in conflict with some development plan policies, such as housing supply policy CP17 and policy CC04, taken overall the proposal is in conflict with the most important policies for determining this appeal, and with the development plan as a whole. The proposal cannot be regarded as sustainable development and there is consequent conflict with policy CP1. There are no material considerations of sufficient weight which indicate that a decision should be made other than in accordance with the development plan

*51. Even had I concluded that the tilted balance of the NPPF or Policy CC01 should apply my overall judgement is that the harm I have identified significantly and demonstrably outweighs the benefits in this case. By either route to a decision, therefore, the appeal must be unsuccessful. The proposed development simply fails to address the fundamental shortcomings associated with the appeal site. Put simply, this would be the wrong development in the wrong place. For the reasons given above I conclude that the appeal should be dismissed.*

*This appeal is directly relevant to the current appeal in hand with many similarities but at a significant enlargement – 5 properties v 200.*

**So, I ask again what's changed?**

Therefore there can only appear to be two real questions that really need to be addressed at this Appeal: and I believe they are:

1. Is the site capable of providing Sustainable Development (as required under the NPPF and Local Plan)
2. Does the proposed development cause Harm?

Taking the first and easiest question,

**Can the site take Sustainable Development:**

The site is not capable of delivering Sustainable Development and this question has been asked and answered many times previously (ref Local Plan and Planning History)

Unsustainable Development Sites don't suddenly become Sustainable (not even when housing numbers change)

**So will the development Cause harm:**

The answer can only be Yes – if a smaller adjacent site of 5 houses causes harm sufficient to refuse at appeal, then surely 200 do.

Furthermore, the developer agrees their proposals are not sustainable by the very fact they acknowledge that the proposals are not consistent with a significant number of the Wokingham Development Plan policies (para 04 – Appellants | Statement of Case Oct 22).

They chose to push the 5yr Housing Supply shortfall as the reason the proposals should be allowed as a result of Out of date Policies – but are the baskets of key Policies Out of date?

The proposed development kills the Character and Appearance of the village with inappropriate scale, density, and form, nearly doubling the size of the village. The proposed development will occupy the green lung between villages and its developments will simply suffocate both villages.

The parody is that the development destroys the very essence of what the developers seeks to exploit.

In return it fails to integrate what will be an appended new standalone community that likely to become alienated and isolated because of ill-thought-out plan. This is not what the NPPF intends.

This rises harm above any Policy and this development clearly causes significant harm:

Sustainability is about supporting and developing communities not about destroying them.

So back to my original question **“what’s changed”**.

Sawpit road!! Was approved at appeal last year:

Saw Pit Road simply isn’t comparable to the site being considered – it was 3 properties in the middle of the village in a well screened and shielded site, whilst it wasn’t disputed this caused harm it was only 3 properties, this does not compare to 200+ homes in a large open expanse of the village setting.

So, what about the 5 Year Housing Land supply? Wokingham is short. Is it relevant?



The fact is that Wokingham **are not failing** in delivery of housing and are ahead of target in overall numbers. This is an agreed fact and others will discuss this.  
(Statement of Common Ground).

More importantly does change in housing numbers make the current Policies out dated? Mr Philip Marsh and the Secretary of State don't think so.

It would be perverse to penalise a Local Authority for beating their stated Housing Need. The result would be the quicker housing is delivered the more they have to provide. A never-ending quest.

Such penalty will not encourage faster development, it will simply delay housing production as Local Authorities across the country more closely restrict the timing of permissions.

For these reasons above I think the 5 yr. HLS is insignificant and should carry very little, or no weight in this appeal.

Government reforms to the NPPF seek to address this over delivery *faux pas*.

In most aspects of law there is also a doctrine of "proportionality" – where the response should be relative to the offence, I see no reason why this should be different.

Turning to the detail of the Application (albeit "detail" is a bit of a generous description) – I've been in the business for 30 years and in recent times I haven't seen such a lightweight proposal – how can you really challenge this – there is little substance, and all is reserved matters and likely to change. Management of this will be difficult.

My experience tells me there seems little point in debating the various technical matters.

The experts are here to tell you there are solutions to all the problems - It what Humans do –solve problems!

However, what many fail to realise is that they are creating the problems in the first place and the solutions are not necessarily Sustainable.

- Offsite biodiversity? Destroying biodiversity and take it elsewhere does not make the site sustainable.
- Offsetting payments to satisfy energy efficiency and construction carbon targets – does this make it sustainable. For 200 housings in 2023 the detail proposals on this aspect is appalling .
- Proximity to a fast train service to London – People generally don't drive into London– its amelioration for the development? But it does highlight the problems with transport in the village – no mention of where do those who don't work in London go?

Transport is a further reinforcing point against the site being capable of providing sustainable development. I've lived in Hurst for 27 years and for all that time I have depended on a car.

I work in London and travel from Twyford station regularly (the fast train) – let me tell you about my experience - the winter is too wet, dark and dangerous to ride a bike, its too far to walk and the buses are not realistically practical , infrequent and not aligning with key Fast Trains. (£106,000 will not change that)

The default is worse than driving it's a LIFT (= two trips a.m. and two trips p.m. v one for driving. This is due to the carpark being full of 0720. The reality repeated by many residents. The car is essential to live in Hurst to function – it's just a fact of rural life.

So, what about the alleged Benefits the development will bring -

Frankly the benefits the developer has proposed are too insignificant to register, and very weak

Sustainability – access to community facilities that are not able to cope with the scale of interjection- proximity to a station you will have to drive to – leisure facilities that don't exist.

Economic Benefits – recognising there will be some benefit it's important to note these can also be provided from other developments that will be in Sustainable locations in Wokingham, so there is no real Benefit, and they can only be regarded as neutral Benefit at best.

Social Benefits – those that are not simply mitigation will also be derived by Wokingham from other developments and should also be neutral in consideration to this appeal.

The reality of the situation is that these 200 homes can be better provided in Sustainable development locations elsewhere in the Borough with better, job prospects, transport, social and living amenities closer to communities where these families want to be, so the benefit must be neutral at best.

Its true that the Affordable Housing is always welcome but this cannot be placed just anywhere, it needs to in locations where it can best serve the whole Borough of Wokingham.

80 properties in Hurst would be misplaced, whilst Hurst does have a requirement its more modest.

There were recently 11 new affordable homes built on Tape Lane and I think only 1 or maybe 2 families came from the village. Interesting those who were decanted choose not to return.

These homes would be better serving the residents if they were built next to the communities that ~~has~~ *they belong to*

The NPPF has a presumption in favour of sustainable development.

This is not Sustainable development; it creates significant harm to the setting and character and appearance of the village and has no credible sustainable features.

It destroys what's it aims to become.

If this appeal is allowed, then every field in Wokingham becomes an acceptable development site – this simply rips up the whole planning system.

For these reasons above I believe the appeal should not be allowed.

Good afternoon,

My name is Aisling and I have lived in Hurst village since I was born, my family have moved house three times within the village.

After briefly moving away for university, I moved back home to live with my parents. I am a young professional working in London commuting in 3-4 days a week from Twyford station.

Anyone else in this room that is familiar with Twyford station will know the difficulties of parking your car. I already car share with 3 others and over recent years, despite hybrid working, we are finding it increasingly difficult and **often impossible to find a car parking space.**

I regularly commute on the 7:09 and 7:23 trains and there have been numerous times that I have been unable to find a car parking space. This results in me having to drive all the way home, leave my car and get a lift in. By this time, I have missed my train and I am late for work.

If the car park can already be full by 7:20am, this is evidence that more houses, meaning more people and more commuters, will only make this problem worse.

You may say, why not cycle? Or why not walk? The walk takes me approximately 30 minutes, I already get up just after 6am, and a 30-minute walk before you even reach the train is not realistic. The roads are dark, wet and lonely and this is not realistic walk when you are in a professional job and expected to turn up to work looking presentable, especially in the winter months. The taxi rank has lost most of its drivers and are very unreliable and have often left me stranded at Twyford station late at night after work.

If you manage to get a car parking space, the problems don't really stop there.

The trains have become increasingly busier, and I am lucky if I get a seat in the mornings. I often have to stand for 30 minutes to get into London and by the time the train stops at Maidenhead the seats are full. This is also the case on the train home, I rarely ever get a seat on the way home.

Over the past year I have actually seen multiple commuters collapsing on the train due to overheating and overcrowding. This was particularly bad during summer months.



**Everyone seemed to think the resolution to all our problems was the Elizabeth Line.**

However, anyone who has actually been on the Elizabeth Line realises it is not at all what it was made out to be. It is a slow stopping service, taking nearly an hour to get to Paddington. It is a tube, no different to any other tubes, and during commuting hours you are packed in like sardines, standing, for an hour. There are no toilets, it is so slow, always delayed and not realistic for a commuter trying to get to work.

The lack of transport in the village is not something that only affects me now, this is a recurring problem that I have experienced first hand growing up in the village.

The reality of living in Hurst is that children must rely entirely on adults in their household to get around until they can drive.

I went to school on the outskirts of Reading and then in Sonning and had to rely entirely on my parents throughout that time for transport.

As I already mentioned, the station is a long walk with school bag, books, sports kit, instruments etc and this was not suitable for the dark winter mornings/late evenings coming home from school.

The public buses were also not an option for school transport, not everyone goes to a school at the end of a bus stop or train line. I did not have the option of public transport to get to either school and school buses did not service this area.

Also, most children do not only just 'go to school' and come back. I personally participated in many clubs and sports and this required even more driving from my parents as none of these were accessible by public transport.

Aside from transport, I have witnessed first-hand the increase in road traffic. I am a keen runner and cyclist, and I have experienced many near misses from speeding and inconsiderate drivers. The roads in Hurst are not able to handle the current flow of traffic safely and the addition of more roads users would only make these matters worse.

A few years ago, I used to keep my horse in the village, but it was too dangerous to ride out, speeding has been a serious issue and I didn't want to risk my own life.





Aisling HG – Hurst Planning Appeal 31/01/2023

I hope the points that I have raised, in regard to transport, accessibility and road safety are first hand evidence that the village is not well connected or as 'close' as it may seem to the station and towns on the map.

Thank you.

