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Development Management, Wokingham Borough Council

Shute End

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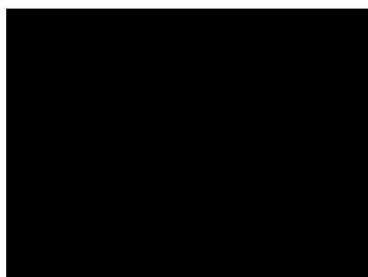
16 JUN 2026

Derek Scuffell

51 Foxborough

Swallowfield

RG7 1RW



Development Management

Wokingham Borough Council

Shute End, Wokingham RG40 1BN

Dear Sir or Madam,

OBJECTION to Planning Application 261171 (iLAP reference PP/14925203)

Site: Land opposite Charlton Lane, Trowe's Lane, Swallowfield, RG7 1RN

Proposal: Change of use of land to a caravan site for the erection of 5 no. gypsy and traveller pitches, each incorporating a static caravan, touring caravan, single-storey day room, bin store, associated parking, access, boundary treatment, hardstanding and hard and soft landscaping.

I am a resident of Swallowfield, and I write as a directly affected member of the local community to OBJECT to the above application, on which public consultation runs until 25 June 2026. My objection is made principally on grounds of flood risk and drainage, and on the conflict between the proposal and both the adopted Wokingham Borough development plan and national planning policy. The grounds are set out below.

1. The proposal and the site in context

The application seeks the change of use of an undeveloped, greenfield parcel on Trowe's Lane, Swallowfield, to a residential caravan site comprising five gypsy and traveller pitches. Each pitch would contain a static caravan (a permanent residential dwelling), a touring caravan and a day room, together with extensive hardstanding, parking, access works and



associated infrastructure.

The greenfield character of the site is not in dispute: it is the applicant's own description. The planning application form describes the existing use as "undeveloped agricultural land" and the last use as an "agricultural field / vacant land," and the Flood Risk Assessment describes the site as "approximately 0.31 hectares ... primarily comprised of undeveloped grassland and a scattering of hedgerows." In planning terms the land is therefore greenfield: it does not fall within the definition of "previously developed land" in Annex 2 of the National Planning Policy Framework, which covers land occupied by a permanent structure and its curtilage and expressly excludes land last occupied by agricultural or forestry buildings. An open, undeveloped agricultural field is not previously developed land.

Swallowfield sits close to the confluence of the River Loddon and the River Blackwater and has a long and well-documented history of flooding. The parish is recognised by the Environment Agency as a flood warning area ("River Loddon and River Blackwater at Swallowfield"), and significant flood events have affected the area in 2007, 2021 and 2024. Flood risk in and around the village arises not only from the main rivers but from surface water run-off, groundwater and ordinary watercourses. This local context is central to the proper determination of this application.

2. Summary of the grounds of objection

The application fails to apply the sequential, risk-based approach to flooding from all sources required by adopted Policy CC09 and national policy, relying instead on the site's fluvial flood zone alone.

The site is assessed in the applicant's own Flood Risk Assessment as being at HIGH risk of surface water flooding and MEDIUM risk of groundwater flooding, yet caravans are a highly vulnerable use that national policy says should not be located in areas at high risk of flooding.

The submitted Flood Risk Assessment is internally inconsistent, was prepared without any consultation with the Environment Agency, the Lead Local Flood Authority or the water company, and cannot be relied upon to demonstrate that the development would be safe for its lifetime.

The proposal would increase surface water run-off from a greenfield site and discharge it towards the Blackwater catchment, contrary to adopted drainage policy and directly at odds with the flood-relief work undertaken in the parish by the Swallowfield Flood Resilience Group.

All foul sewage would be stored in a 50,000 litre cesspool emptied by tanker at least fortnightly, in a flood-prone, high-groundwater location, contrary to the guidance in Building Regulations Approved Document H that cesspools should not be sited where there is a risk of flooding.

Safe access and egress in a flood event has not been satisfactorily demonstrated.



The proposal represents new traveller development in open countryside that national policy says should be very strictly limited.

3. Ground 1: Failure to apply the sequential, risk-based approach to flooding from all sources

Adopted Policy CC09 (Development and Flood Risk (from all sources)) of the Wokingham Borough Managing Development Delivery Local Plan (adopted 21 February 2014) requires that:

"All sources of flood risk, including historic flooding, must be taken into account at all stages ... to avoid inappropriate development in areas at risk of flooding"

and that "Development must be guided to areas of lowest flood risk by applying the sequential approach taking into account flooding from all sources and shall ensure flood risk is not worsened for the application site and elsewhere..." (Policy CC09, parts 1 and 3).

The applicant's Flood Risk Assessment and Drainage Strategy (Swallowfield FRA DS 01, November 2025) dismisses the Sequential Test and Exception Test solely on the basis that the site lies within fluvial Flood Zone 1. It states that "the Exception Test is not required, as the site does not fall within Flood Zone 2 or 3, nor is it subject to other significant sources of flood risk that would necessitate its application."

That conclusion is directly contradicted by the FRA's own findings. The same document assesses the risk of surface water flooding to the development as HIGH ("The risk to the development of flooding from surface water has been assessed as High") and the risk of groundwater flooding as MEDIUM. Policy CC09 requires the sequential approach to be applied to flooding from ALL sources, not fluvial sources alone, and requires historic flooding to be taken into account. The FRA does neither. The assertion that the site is not subject to other significant sources of flood risk cannot be reconciled with the High and Medium ratings the assessment itself records.

The change of use proposed is to a more vulnerable use (permanent residential accommodation). It does not fall within any of the limited circumstances in which Policy CC09 dispenses with the sequential test (replacement of a single dwelling, conversions or changes of use that are not to a more vulnerable class, or minor development). A proper sequential assessment, considering whether the identified need could be met on reasonably available sites at lower risk of surface water and groundwater flooding, has not been carried out. On that basis the application does not accord with Policy CC09, with Core Strategy Policies CP1 (criteria 9) and CP3, or with the flood-risk provisions of the National Planning Policy Framework.

National planning policy specific to this type of development reinforces the point. The Planning Policy for Traveller Sites (December 2024) states, at paragraph 13(g), that local planning authorities should ensure their policies "do not locate sites in areas at high risk of flooding, including functional floodplains, given the particular vulnerability of caravans." The proposal places highly vulnerable caravan accommodation on land that the applicant



accepts is at high risk of surface water flooding. That is squarely contrary to the thrust of national traveller-site policy.

It is also relevant that the National Planning Policy Framework (Annex 3) classifies “caravans, mobile homes and park homes intended for permanent residential use” as Highly Vulnerable development. The FRA reproduces this very table, yet in its mitigation section it describes the static caravans as a “more vulnerable” use. That mis-classification understates the vulnerability of the occupants and the weight that flood risk should carry in the planning balance.

4. Ground 2: The proposal conflicts with the parish’s flood-resilience evidence and investment

Swallowfield Parish Council maintains an established Flood and Resilience Group, the Swallowfield Flood Resilience Group, which was formed following the serious floods of 2007. The Group’s work provides a substantial local evidence base on flood risk in the parish that is directly material to this application.

The Parish Council has commissioned two significant reports from hydrological consultants which have been used to assess flood risks across the parish and to identify and prioritise flood-relief projects. These have informed practical schemes including a swale at Swallowfield Recreation Ground and, most recently, the Riseley Natural Flood Management scheme. That scheme, completed with Environment Agency grant funding and based on hydraulic modelling and recommendations in an August 2022 report, involved the construction of 67 leaky barriers and several clay-cored embankments across Coldharbour Wood, St Leger’s Copse and Collins Copse to slow the run-off of flood water.

As the Group’s Chair has explained, although that work was carried out at Riseley, “the whole parish will benefit as the leaky barriers and clay banks will slow down flood water run-off from reaching Swallowfield.” In other words, the community and the public purse have invested specifically in slowing the rate at which water reaches Swallowfield and the Blackwater. This application runs counter to that objective. It proposes to cover a currently undeveloped greenfield parcel with caravans, day rooms, parking and hardstanding, and to discharge the resulting surface water into an ordinary watercourse that drains to the Blackwater. Intensifying run-off at this location would tend to undermine, rather than support, the flood-resilience measures the parish has put in place.

5. Ground 3: The Flood Risk Assessment is deficient and cannot be relied upon

Even taken on its own terms, the submitted Flood Risk Assessment does not provide a sound basis for granting permission. It contains a number of material weaknesses:

No statutory consultation. The FRA expressly states that “Consultation with statutory authorities has not been undertaken in the production of this Flood Risk Assessment.” The Environment Agency, the Lead Local Flood Authority and the water company have not been engaged, despite the site’s high surface water and medium groundwater risk.



Internal contradiction on surface water. The FRA describes the site as being at "high risk of surface water flooding" while elsewhere asserting there are "no recorded areas of surface water flooding within the site boundary." These statements cannot both be relied upon, and the optimistic reading is not justified by any site-specific modelling.

No site-specific flood modelling or levels. No modelled flood levels (for example in metres above ordnance datum) are provided for any return period. Finished floor levels are set relative to existing ground level rather than to any modelled 1% annual probability plus climate change flood level.

Inconsistent mitigation. The body of the FRA states that the static caravans would be raised approximately 1 metre above ground level, whereas its conclusions state a minimum of only 600mm. The mitigation also depends on removing spoil to create flood storage and on clearing "unmaintained and overgrown" ordinary watercourses, neither of which is secured.

High groundwater and ruled-out infiltration. Groundwater was encountered at around 1.2 metres below ground level, the soils are recorded as having a naturally high water table, and infiltration drainage has been ruled out. Below-ground drainage features would require anti-flotation design, and groundwater mitigation is deferred to a later "detailed design stage."

Proposed discharge exceeds the required greenfield restriction, with no consent. The drainage strategy (FRA section 8.7) records that, under Wokingham Borough Council Lead Local Flood Authority guidance, surface water discharge from the site "must be restricted to the equivalent 1 in 1 year greenfield runoff rate," which the FRA calculates, using the UKSuDS / FEH Statistical method, as 0.3 litres per second. The strategy nonetheless proposes to discharge at 1.2 litres per second, four times that required rate, on the basis that the lower rate is "not considered practical." Whether that departure is acceptable is a matter for the Lead Local Flood Authority to assess and should not be accepted without scrutiny. An ordinary watercourse discharge consent has not been obtained.

Incorrect catchment stated. The FRA states, at paragraph 6.1.2, that "The site is located within the Wandle Catchment," and takes its peak river flow climate-change allowances on that basis. That is incorrect. The site drains to the River Blackwater, which is a tributary of the River Loddon and lies within the Loddon management catchment of the Thames River Basin District, not the Wandle catchment (a separate catchment in south London). Because the Environment Agency publishes peak river flow climate-change allowances by management catchment, the allowances used should be confirmed against the correct (Loddon) catchment. The error suggests a lack of care in the assessment.

Adopted Policy CC09 permits new development in areas of flood risk only in exceptional circumstances, and only where it can be demonstrated that the development will be safe for its lifetime, will not increase flood risk elsewhere, incorporates flood-resilient measures, and is supported by appropriate evacuation and flood-response procedures. The deficiencies above mean the FRA does not discharge that burden.

6. Ground 4: Increased surface water run-off and conflict with sustainable drainage policy



Adopted Policy CC10 (Sustainable Drainage) requires that development proposals "reproduce greenfield runoff characteristics and return run-off rates and volumes back to the original greenfield levels" for greenfield sites, and incorporate sustainable drainage systems of an appropriate design with clear arrangements for long-term maintenance to the satisfaction of the Council as Lead Local Flood Authority.

This is a greenfield site. The applicant's own drainage strategy records that the Lead Local Flood Authority requires discharge to be restricted to the 1 in 1 year greenfield run-off rate of 0.3 litres per second, yet proposes to discharge at 1.2 litres per second, four times that rate. That does not meet the required greenfield restriction, and the long-term maintenance of the proposed system and of the receiving ordinary watercourses is not secured. The proposal therefore conflicts with Policy CC10, and, by discharging surface water at a rate above that required to protect the receiving watercourse, with the requirement in Policy CC09 that flood risk must not be worsened for the application site or elsewhere.

7. Ground 5: Foul drainage by cesspool in a flood-prone, high-groundwater location

The application does not propose connection to the mains foul sewer. The Flood Risk Assessment (section 9.3) records that the nearest public sewer is around 300 metres away and concludes that, applying the relevant distance test, a connection is "not reasonable." Instead, "all foul water generated from the development will be collected via a gravity fed drainage network and discharged into [a] cesspool," which it recommends should be 50,000 litres in capacity and "emptied on a frequency of not less than fortnightly."

A cesspool is a sealed storage tank with no treatment and no outfall: it simply stores all foul sewage until it is removed by tanker. It is generally regarded as the least sustainable foul-drainage solution and a last resort. The reason a conventional septic tank with a drainage field is not proposed appears to be the same reason the surface water strategy rules out infiltration, namely the high water table. Groundwater was recorded on site at around 1.2 metres below ground level, and Building Regulations Approved Document H advises that the groundwater table should not rise to within 1 metre of the invert of a drainage field. A drainage field is therefore unsuitable at this location.

This location is, however, precisely where Building Regulations guidance says a cesspool should not be placed. Approved Document H (Wastewater treatment systems and cesspools, requirement H2) provides that wastewater treatment systems and cesspools should be "sited and constructed so as not to ... be in an area where there is a risk of flooding." The Flood Risk Assessment assesses the site as being at HIGH risk of surface water flooding and MEDIUM risk of groundwater flooding, and the parish has a documented history of flooding. Siting a 50,000 litre foul store in such a location runs directly contrary to that guidance.

Two further practical concerns arise. First, flotation. The FRA accepts that below-ground structures such as the surface water attenuation tanks and manholes require flotation, or anti-buoyancy, assessment because of the high groundwater table, yet the foul-drainage section is silent on the flotation risk to the far larger 50,000 litre cesspool. A buried tank in saturated ground is at risk of uplift, and the inundation or surcharge of a foul store during a



flood would release raw sewage into floodwater and into the adjacent ordinary watercourses that drain to the River Blackwater.

Second, tanker access. The strategy depends on a large tanker reaching the site at least fortnightly, in perpetuity, along the same narrow rural lanes that the FRA itself accepts are subject to flooding. If that access is interrupted during prolonged wet weather, the cesspool will fill and overflow. As a local resident, I have witnessed Thames Water deploying tankers, at times around the clock, near Swallowfield village hall during recent peak flood periods because the wastewater network could not remove water quickly enough. The FRA's own assessment records 181 sewer-flooding incidents in the RG7 1 postcode area between January 2000 and May 2022, which indicates that the local wastewater system is already under stress in wet conditions.

For these reasons the foul-drainage strategy conflicts with the guidance in Approved Document H, does not demonstrate that the development would be safe and free from pollution for its lifetime as Policy CC09 requires, and would place undue pressure on local infrastructure and services, contrary to the sustainability objectives of Core Strategy Policy CP1 and to paragraph 13(f) of the Planning Policy for Traveller Sites.

8. Ground 6: Safe access and egress have not been demonstrated

The FRA relies on occupants self-evacuating using their own four-wheel-drive vehicles "that have sufficient ground clearance," along a route running south via Trowe's Lane, Part Lane, Odiham Lane and onward to the B3349 and A33. No dry pedestrian egress is demonstrated, no flood-warning registration is proposed, and the named route runs along narrow rural lanes that the assessment itself acknowledges are associated with flooding from the Blackwater. Reliance on residents owning suitable vehicles, and on self-evacuation without a flood-warning mechanism, is not a sound basis for concluding that the site would be safe for its lifetime, particularly for a use occupied by families with children, older people and those with health needs.

9. Ground 7: New traveller development in open countryside

The Planning Policy for Traveller Sites (December 2024) provides, at paragraph 26, that local planning authorities "should very strictly limit new traveller site development in open countryside that is away from existing settlements or outside areas allocated in the development plan," and should ensure that sites in rural areas respect the scale of, and do not dominate, the nearest settled community, and "avoid placing an undue pressure on the local infrastructure." The application site is an unallocated greenfield parcel in open countryside served by narrow rural lanes.

The same policy, at paragraph 27(a), directs that weight should be attached to the "effective use of previously developed (brownfield), untidy or derelict land." This proposal is the opposite: it would develop an undeveloped greenfield agricultural field. That positive consideration therefore does not apply, and the greenfield, open-countryside character of the site weighs against the proposal. Insofar as the Council is asked to weigh need against harm, that exercise should be carried out in the knowledge that the flood-risk and drainage



objections set out above weigh heavily against the suitability of this particular location.

10. Conclusion and request

For the reasons set out above, the application is contrary to the adopted development plan, in particular Core Strategy Policies CP1 and CP3 and Managing Development Delivery Policies CC09 and CC10, and to national policy in the National Planning Policy Framework and the Planning Policy for Traveller Sites. The applicant has not demonstrated that highly vulnerable residential accommodation can be safely and sustainably located on a greenfield site that is at high risk of surface water flooding, within a parish with a well-documented history of flooding.

I therefore respectfully request that the application be REFUSED. If the Council is minded to consider it further, I ask, as a minimum, that it should not be determined until the Environment Agency, the Lead Local Flood Authority, Thames Water and the Council's environmental health and building control officers have been formally consulted, and until a revised Flood Risk Assessment and drainage strategy has been provided that properly applies the sequential, risk-based approach to flooding from all sources, includes site-specific modelling, addresses the flotation and pollution risks of the proposed cesspool in this high-groundwater location, and demonstrates compliance with Policies CC09 and CC10 and with Approved Document H.

Please register this objection against application 261171 and confirm receipt. I should be grateful to be notified of the committee date, should the application be determined by committee, and of the decision in due course.

Yours faithfully,

Derek Scuffell

Annex: sources and policy references

Application

Wokingham Borough Council planning application 261171 / PP/14925203, Land opposite Charlton Lane, Trowe's Lane, Swallowfield, RG7 1RN. Consultation 04 June to 25 June 2026.

Flood Risk Assessment & Drainage Strategy, Swallowfield FRA DS 01, prepared by Debby Booth CEng MICE, November 2025 (submitted with the application).

Development plan and national policy



Wokingham Borough Managing Development Delivery Local Plan (adopted 21 February 2014), Policy CC09 (Development and Flood Risk (from all sources)) and Policy CC10 (Sustainable Drainage).

Wokingham Borough Core Strategy (2010), Policy CP1 (Sustainable Development, criteria 9) and Policy CP3 (General Principles for Development).

Wokingham Borough Strategic Flood Risk Assessment (2012; updated 2023).

National Planning Policy Framework, flood-risk provisions and Annex 3 (Flood Risk Vulnerability Classification).

Planning Policy for Traveller Sites (December 2024), paragraphs 13(f), 13(g) and 26.

Building Regulations 2010, Approved Document H (Drainage and waste disposal), requirement H2 (Wastewater treatment systems and cesspools).

Swallowfield Flood Resilience Group

Swallowfield Parish Council, Flood Resilience Group page and "Riseley Natural Flood Management Project" (presentation by Graham Stanley, Chair of the Swallowfield Flood Resilience Group, April 2025).

Environment Agency flood warning area "River Loddon and River Blackwater at Swallowfield."

