

For the attention of the Planning Inspector

12 September, 2026

Re: Appeal reference number: 6014086

Address: Land at Lodge Road, Hurst, Wokingham, Berkshire, RG10 0SG, United Kingdom

Planning application reference: 252G34 Start date: 11 August 2026

Further to my previous, original objection submitted to Wokingham Borough Council on 9th February, 2026 I would like to add the following:

My objections still stand as per my submission to WBC portal in that this site remains an unacceptable development outside the settlement limit in an unsustainable location, which is prone to serious flooding and will cause substantial flood risk to the wider area.

Since the initial application, the NPPF has been renewed (17th August, 2026) and the Bellamy Roberts Flood Risk Assessment (FRA dated 17th October 2025, submitted on the WBC planning portal on 18th August, 2026) and the Bell Cornwell Flooding Sequential Test and Exception Test Report (dated November 2025 - submitted on to the WBC portal 18th August, 2026) are out of date as their argument is based on the outdated NPPF December 2024. No further updates regarding flooding are available on the portal for interested parties to comment upon.

The August 2026 NPPF abolished numbered paragraphs entirely in favour of lettered/coded policies grouped into thematic chapters and this applies to every decision made from 17th August 2026 onwards, including appeals and applications submitted under the old version.

1. The sequential test survives and the surface water exemption is now stronger.

The appellant is using the failure of the sequential test to argue the tilted balance is “nonetheless engaged” built on a presumption-in-favour mechanism that has been structurally replaced in the new NPPF.

The appellants Sequential Test Report (Paragraphs 3.2 - 3.3) that a site specific FRA can exempt surface-water-only risk from the sequential test was, in November 2025, resting on Planning Practice Guidance (PPG) alone; The PPG is non-statutory ‘supporting’ guidance status. Since then NPPF 2026 Policy F5(2)(bii) of the NPPF quite clearly states that:

ii. Where the site would be at risk of surface water flooding only, the proposed layout, design, and mitigation measures would ensure that occupiers and users would remain

safe from current and future surface water flood risk for the lifetime of the development without increasing flood risk elsewhere in accordance with Policy F7.

The exception test is now a standalone, three-limb policy (F6). It adds an explicit '**must not increase flood risk elsewhere and should reduce it where possible**' limb to the two limbs (wider sustainability benefit plus lifetime safety). The appellant cannot possibly confirm that this development will not increase flood risk elsewhere or the residents and the neighbouring properties 'lifetime safety' and therefore is in conflict with NPPF 2026 Policy F7 (1 C 2).

NPPF (2026) Policy F5 states that the aim of the sequential test is **to steer new development to areas with the lowest risk of flooding from any source**; This site brings no benefit, neither is it sustainable. It is located in an area at risk of flooding where alternative sites, appropriate for the development, are reasonably available in areas with a lower risk of flooding. On this basis alone the appeal should be dismissed.

2. Environment Agency Surface Water Flooding identified on Site.

In addition, since the Appellant's 2025 FRA and Sequential Flooding reports, the Environment Agency Flood Map for Planning carries surface water climate change extents and banded depth. Since 17th August, 2026 the new NPPF names that map as the evidence base for when a FRA and the Sequential Test are required. The NPPF (2026) Policy F4 can require a FRA on any site the map show at risk from surface water. Surface water is the most widespread source of flood risk in England. It is evident from the updated EA Map that this site is subject to a substantial amount of surface water flooding and clearly not only risking any future development on the site, but also the neighbouring properties in all directions.

[Map - Flood map for planning - GOV.UK](#) for RG10 0SG

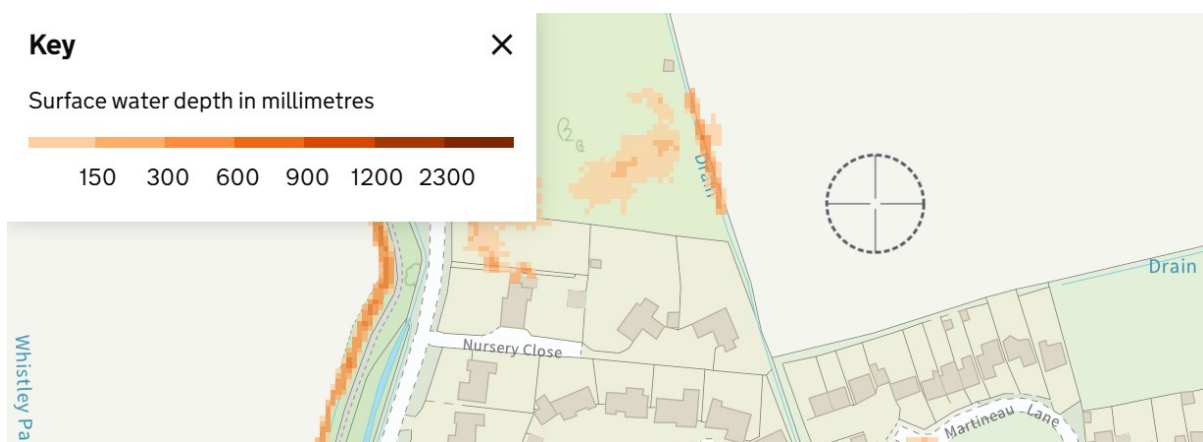


Image 1 - EA Surface Water mapping

Image 1 Screenshot demonstrates Environment Agency Surface water depth and how the runoff will substantially and detrimentally affect the neighbouring properties and land. The Drain

referred to, is in fact the Hatchgate Ditch, which EA identify as a 'main river' which runs at the back of the property. However, due to interference by the landowners of the field to the East of the site, the Hatchgate Ditch is blocked and therefore the water flow backs up to those properties in Martineau Lane which are adjacent to and back on to the 'Drain' (which also runs into Hatchgate Ditch). So it is not just Nursery Close that will be significantly at flood risk, but also those properties in Martineau Lane.

3. Failure to consider 2024 WBC S1G Flood Investigation

In November 2024 Wokingham Borough Council produced their final S19 Flood Investigation Report on the flooding in Hurst in March 2023 which concluded in S6 and S9 (6.1 p28 C 9.1 p49) that Hurst had a **1 in 3 year flooding event (APPENDIX 1)** and that the rain fall event in 2023 was relatively frequent and would not be considered an extreme storm event to cause this flooding. The appellant has chosen to ignore this information in their reports.

4. Substantial Loss and Harm to Visual Amenity and Historic Character

Looking at the Appellants Landscape and Visual Appraisal, the LVIA's do not represent a true picture of the substantial impact this proposed development will have on the surrounding area, including the visual amenity enjoyed by those who live on Tape Lane, as in the winter months, the dwellings will be highly visible as inevitably they will have to raise the floor levels to try and counter the substantial flood risk and in doing so will be substantially harming the reverse 'C' landscape which is part of the historic and rural character of Hurst and Whistley Green.

5. Emerging Local Plan Update

The Local Plan Update ("LPU"), the plan which will supersede the current CS and MDD LP, was published for Regulation 19 consultation in October 2024 and submitted to the Secretary of State for independent examination in February 2025. The examination hearing sessions have now concluded, and the Inspectors issued a **Post Hearings Letter on 4 August 2026**.

The Inspectors have advised that, at this stage, the Plan is likely to be capable of being found sound and legally compliant, subject to the preparation, consultation and consideration of Main Modifications, together with updated Sustainability Appraisal and Habitats Regulations Assessment work. The Inspectors make clear that their conclusions remain subject to consultation on the Main Modifications and consideration of any representations received before a final report is issued.

Whilst the Inspectors identify a number of amendments to the housing trajectory and certain allocations within Policy SS14, they also conclude that no additional housing

allocations are required for the Plan to be sound. Furthermore, they confirm that the housing land supply assumptions are broadly robust and justified, subject to specified adjustments. Additionally, no required amendments are identified in relation to policy SS2 which sets out the spatial strategy and settlement hierarchy, wherein the application site would remain outside of settlement limits within designated countryside.

NDMP DM4: Emerging development plan proposals states that weight may be given to relevant policies in emerging development plans according to:

“(a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);

(b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and

(c) the degree of compliance of the relevant policies in the emerging plan with the policies for plan-making in this Framework (the closer the policies in the emerging plan to the policies in this Framework, the greater the weight that may be given to them)”

In this case, the LPU has progressed through examination hearings, and the Inspectors have indicated that it is likely to be capable of adoption subject to Main Modifications.

Although those Main Modifications have not yet been published or consulted upon, the LPU has **reached a very advanced stage** in its preparation and attracts moderate weight as a material consideration. It continues to direct development towards defined settlements and provides strong support for the conclusion that the site is not an appropriate location for residential development.

Summary:

The appellant clearly has not bothered to update any of their planning documents since their original planning application, instead they are relying on outdated policies and case law; using an outdated Framework as the basis for their argument.

For the reasons given above together with my original objection, I request that this application be dismissed.

APPENDICES:

1. Wokingham Borough Council (2024) Final S19 Flood Investigation Report on the flooding in Hurst in March 2023.