

PLANNING REF : 261171
PROPERTY ADDRESS : Northcote
: Swallowfield Street, Swallowfield, Reading
: RG7 1QX
SUBMITTED BY : Mr Graham Stanley
DATE SUBMITTED : 06/06/2026

COMMENTS:

I object to this application because the submitted Flood Risk Assessment (FRA) does not demonstrate, with sufficient evidence, that the development would be safe for its lifetime without increasing flood risk elsewhere, as required by national and local planning policy.

Swallowfield Flood Resilience Group, working with Swallowfield Parish Council, has acquired extensive learning about surface water flooding in the area, particularly through the severe surface water flooding which occurred in July 2007. Detailed studies have been undertaken on behalf of SPC, by Herrington Consulting (January 2017) and by JBA Consulting (August 2021). The comments I have made below are made in the light of the community's experience and these detailed studies of flood risk.

The proposed development site sits at the confluence of three major surface water flow paths. Firstly, there is a flow of floodwater along Trowes Lane, from south to north. Secondly, there are significant flows from high ground to the west of Swallowfield, which run in a large ditch which runs eastwards from Goddards Farm on the B3349, to Trowes Lane. Lastly, there is a major flow path along the surface of Charlton Lane, toward its junction with Trowes Lane. In July 2007, both these flows were observed to be deep and fast-flowing. It is unclear from the FRA whether the hydraulic assessment has taken account of exceedance flows arising from blockage or surcharge of the culvert beneath Trowes Lane, or whether site-specific modelling has been undertaken to assess the interaction of the three converging flow paths during extreme rainfall events. In the absence of such analysis, the FRA does not provide sufficient evidence that flood risk has been properly characterised.

From the above noted confluence of flows into the area of the site, flood water is dissipated either further northwards along Trowes Lane or into the ordinary watercourse known locally as the Naylor's Ditch, which drains eventually into the Blackwater River. In July 2007, the northward flows along Trowes Lane resulted in extensive property damage in the central area of Swallowfield.

In paragraph 6.3.1 of the FRA, it is acknowledged that the site has a high risk of surface water flooding. In paragraph 4.3.1, Table 5 it is highlighted that Annex 3 of the NPPF classifies caravans, mobile homes and park homes intended for permanent residential use as "highly vulnerable". Given that the proposed accommodation intended for residential occupation is classified as "highly vulnerable" and the applicant should clearly demonstrate why this use is appropriate in a location acknowledged by the FRA itself to be at high risk of surface water flooding.

I consider the flood risk mitigation in section 7 of the FRA to be inadequate, for the following reasons: -

The proposed SuDS measures appear to address runoff generated within the site boundary but do not appear to mitigate the substantial volume of surface water arriving from off-site catchments. The FRA does not demonstrate how the development will remain safe when subjected to these external flood flows.

Any raising of ground levels, including the suggested entrance ramp, should be supported by robust evidence demonstrating that flood storage will not be displaced and that flood risk will not be increased on neighbouring land, the highway network or existing properties.

The FRA places significant reliance on access and evacuation measures. However, surface water flooding in this location can develop rapidly, with limited warning and potentially hazardous flow velocities and depths. The FRA does not appear to demonstrate that safe access and egress can be maintained during severe storm events, or that occupants could reliably evacuate before hazardous conditions arise. Particular regard should be given to the vulnerability of residents who may have reduced mobility.

The proposal for a new cesspool has not been adequately justified. National planning guidance generally applies a hierarchy that favours connection to the public foul sewer where reasonably practicable. The application should demonstrate why connection to the Thames Water sewerage network is not feasible. Furthermore, the potential environmental and public health implications of a cesspool in an area affected by flooding require careful assessment. Notwithstanding the above, the capacity issues which exist on the Swallowfield foul drainage system should be addressed before any further connection to the public sewer is made.

For the reasons set out above, I do not consider that the applicant has demonstrated that the proposed development would be safe from flooding for its lifetime, that safe access and egress can be maintained during flood events, or that flood risk elsewhere would not be increased. I therefore request that the application be refused unless a revised and substantially more robust Flood Risk Assessment is submitted, supported by detailed hydraulic modelling and evidence addressing the concerns I have identified.