

PLANNING REF : 253074
PROPERTY ADDRESS : New Hurst Village Society
:
: RG10
SUBMITTED BY : Nick Willson
DATE SUBMITTED : 26/01/2026

COMMENTS:

The Village Society objects to the Reserved Matters application in relation to the above site on the grounds of;

1. Failure to demonstrate compliance with appeal decision and conditions
2. Inadequate drainage/sewerage management plan
3. Dwelling appearance and design not in keeping with the village envelope
4. Traffic management conflicts with existing highways provision

Our reasons for objection are set out below:

1. Appeal conditions compliance failure

The Reserved Matters submission fails to include a single, scaled, fully dimensioned site layout plan showing horizontal distances between buildings, site boundaries, the public right of way, and Orchard Road. This omission is material in that outline planning permission was granted at appeal subject to strict parameter control, with compliance explicitly required with the approved Parameter Plan (Drawing 235.115 Rev C) and the appeal conditions, including Condition 4 (approved plans) and Condition 18 (minimum stand-offs from Orchard Road and School Road).

In the absence of a fully dimensioned layout plan, it is not possible for the local planning authority, consultees, or third parties to

verify:

- that all built form sits wholly within the approved parameter envelope.
- that minimum stand-off distances from Orchard Road and School Road are achieved in accordance with Condition 18.
- that the relationship between dwellings and the retained public footpath is no more harmful than that assessed and accepted by the Inspector.
- that the spatial assumptions relied upon at appeal (including openness, fragmentation, and a "loose village" character) are being faithfully implemented.

While the application includes civil engineering and highway drawings (including Section 278 layouts, road setting-out information, levels and sections), these documents are not substitutes for a dimensioned planning layout.

The Reserved Matters being determined include layout, and compliance cannot be inferred, approximated, or left ambiguous. The absence of a dimensioned layout frustrates meaningful scrutiny and prevents interested parties from concluding that the Reserved Matters accord

with the appeal decision and approved outline permission.

This is not a matter that can be deferred by condition. The Reserved Matters application, as submitted, is inadequately detailed and should not be approved until a fully dimensioned site layout plan is provided demonstrating compliance with the appeal-approved Parameter Plan and conditions.

2. Drainage/sewerage management plan

The Reserved Matters application relies fundamentally on an infiltration-led surface water drainage strategy, incorporating soakaways, permeable paving, and sub-base attenuation, as set out in the submitted Drainage Strategy and associated drawings. However, when assessed against both the site-specific infiltration evidence and the Council's recent approach to an immediately adjacent site (application 240846), the strategy lacks sufficient robustness and certainty to demonstrate that surface water flood risk will be safely managed for the lifetime of the development.

The infiltration testing undertaken by Peter Baxter Associates confirms that ground conditions across the site are variable and constrained, with recorded infiltration rates in the range of approximately 7.8×10^{-5} m/s to 2.4×10^{-5} m/s, and with at least one test location failing due to groundwater ingress.

These findings demonstrate that:

- Infiltration performance is marginal rather than robust.
- The presence of groundwater at test depth introduces a material risk of seasonal or storm-related failure.
- The strategy is highly sensitive to assumptions about continuous infiltration performance.

Despite this, the drainage design and hydraulic modelling proceed on the basis that infiltration will operate at the tested rate throughout design storm events, including the 100-year plus climate change scenario, with no allowance for reduced permeability, clogging, groundwater mounding or winter groundwater conditions. The modelling outputs indicate that system performance during extreme events is critically dependent on infiltration continuing to function as assumed, rather than on conservative attenuation alone. This approach does not represent a precautionary or resilient drainage design.

The limitations of the current strategy are underscored when compared with the Council's treatment of planning application 240846 (Sawpit Road, Hurst), which is located immediately adjacent and within the same geological and hydrogeological context.

For application 240846:

- Ground investigation and monitoring identified consistently high groundwater levels, measured at between approximately 2.0m and 2.4m below ground level.
- On the basis of this evidence, both the Lead Local Flood Authority consultation response and the Officer Report concluded unequivocally

that infiltration was unsuitable for managing surface water runoff at that location

- As a direct result, the drainage strategy was re-designed to remove reliance on infiltration entirely, instead providing on-site attenuation with a controlled discharge to the main river, supported by an Environment Agency Flood Risk Activity Exemption.

Please note that the main river referred to in application 240846, known as Hatchgate Ditch, has since been determined not to be a river but a ditch, without connection to a main river course.

Application 242067 was refused at appeal

(APP/X0360/W/25/3364304) in part due to failure of the sequential test on the site containing Hatchgate Ditches.

Against that background, it is notable that the current Reserved Matters application:

- Relies heavily on infiltration as the primary means of surface water disposal
- Acknowledges variable ground conditions and a failed infiltration test, yet continues to assume infiltration viability

- Does not present groundwater monitoring data comparable to that relied upon for planning application 240846

- Does not demonstrate why infiltration should be considered acceptable here when it was explicitly rejected on an adjacent site with similar conditions.

No clear or compelling justification is provided to explain this divergence in approach. Accordingly, the Reserved Matters submission fails to demonstrate compliance with national and local planning

policy requirements to avoid increased flood risk and to ensure the long-term effectiveness of drainage infrastructure. The application should not be approved unless and until a more resilient, non-infiltration-dependent drainage strategy, or equivalent level of evidential assurance, is provided.

If we look at the wider issue of flooding and drainage in Hurst, WBCs S19 Flood Investigation Report, January 2024, Appendix A: Addressing Flooding in Hurst states:

"If the threat of flooding in Hurst is to be addressed during periods of intense rainfall, the amount of water pooling in the village needs to be mitigated. Whilst the nature of the local topography (flat, with limited elevation above sea level) and the geology (heavy clay sub-soil) make it likely that flooding will never be eradicated, an initiative bringing together local landowners to help solve the problem has produced a practical plan. This essentially comprises the following: A. The flow of water downstream from Hurst must be vastly improved (ie. via the Twyford Brook and onwards to the River Loddon). This will ensure floodwater is taken away from the village as efficiently and as quickly as possible. B. The water upstream from Hurst - which otherwise exacerbates any flooding issues in the village - needs to be held back when there is excessive rainfall."

And, from 'The Plan', point 4:

Thames Water: It is widely recognised that Thames Water's pumping station is woefully inadequate for the job, resulting in drains

overflowing and adding to the flooding issues in Hurst. Therefore, WBC should deal with Thames Water to find a resolution for this problem.

No upgrades have been performed on pumping station capability since the S19 report was published and yet the Nursery Gardens and Sawpit Road developments have been allowed to proceed at appeal.

3. Dwelling appearance

Much of the proposed development facade appears as brick at ground floor level, with grey cement weatherboarding for the upper floor. In some cases, weatherboard is used across the entire facade. This appearance is not typical of Hurst village and the adjacent Area of Special Character designation. The proposed design creates visual discordance with neighbouring properties, the large, dark grey structures, exacerbated by grey window frames everywhere, looking monolithic and out of place. The properties look "windowless" and, frankly, unappealing.

The applicant's own Design Statement, section 2 - Local Character and Distinctiveness - page 6 shows a selection of established and appealing properties in Hurst, most of which are clearly red brick with red or grey tiled roofs and light or wood window frames. Page 7 shows established homes in Twyford which, overall, share very few characteristics with the houses shown for Hurst. Twyford is a town, which neighbours the village of Hurst, but is distinct from it. The appearance of some properties there are noticeably different and are not found anywhere in Hurst. It seems that Twyford property pictures have been included to somehow justify the introduction of grey weatherboard facades into the proposed development.

We respectfully suggest the facades be revised to fit in with neighbouring properties in Hurst.

4. Traffic Management and Highway safety

Paragraph 115 of the NPPF allows refusal on highway grounds where a proposal would result in an unacceptable impact on highway safety.

While the Reserved Matters submission demonstrates that the access and internal road geometry are technically workable, highway safety depends on how traffic and parking operate in practice, not geometry alone. The scheme relies heavily on garages and short driveways to meet parking demand, without evidence that those spaces will function as effective long-term parking. Experience shows such garages are often used for storage, increasing the likelihood of on-street parking.

The internal road layout has limited tolerance for informal parking, meaning overspill would risk carriageway obstruction, restricted refuse and emergency access, and increased vehicle reversing. These risks are amplified by the site's immediate relationship with School Road and the adjacent Primary school and Pre-school, where peak traffic coincides with high pedestrian activity that includes large numbers of young children.

No operational traffic or parking management strategy has been

provided to address peak-time interactions or overspill. As a result, the safety of development, particularly for young children crossing the access points, to get from one pavement to the next, is dependent on behavioural assumptions rather than secured design or management measures. In these circumstances, the proposal has not demonstrated that it would avoid an unacceptable impact on highway safety, as required by paragraph 115 of the NPPF.

New Hurst Village society urges WBC to review these and other aspects of the planned development, once the developer has submitted further detail and clarification, and to refuse the Reserved Matters until the plans are modified and submitted for further review.

Yours sincerely,

Nick Willson
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New Hurst Village Society