

PLANNING REF : 261825
PROPERTY ADDRESS : 5 RYECROFT CLOS Wargrave
: Reading, Berkshire
: RG10 8BL
SUBMITTED BY : Mr Richard Thomas
DATE SUBMITTED : 19/08/2026

COMMENTS:

I object to this application.

GREEN BELT

I disagree with the grey belt land designation arrived at because of previous land use.

Only a small part of the overall site was used as the plant nursery. If you scroll back through GoogleEarth time series satellite images you can see the majority of the site overall has been heavily overgrown since around 2004.

Trees and overgrowth within the site have been recently cleared since August 2025 and the debris /remains of quite large trees can be seen on site and in the photographs in the ecology report. This has not

been recognized in the arboricultural report, the ecology report or in the planning statement. Presumably a cynical attempt to make the site appear more derelict, more brownfield, less greenfield/ greenbelt and of lower ecological and arboricultural value than it actually was a year ago, for the purposes of securing a planning consent.

I would urge planning officers to designate the site as a whole as "Green Belt" land, and as such the application should be refused.

The footprint of the new dwelling, garages and paved areas is at least 5 times larger than that of the previous polytunnel and greenhouse. Therefore there is very significant expansion (500%) of built

development away from the footprint of the original buildings, and loss of green space in the green belt. Contrary to Policy CP11 items 2) and 4), and TB01, 2. and 3.

DRAINAGE

The Drainage Strategy and outline design submitted by the Applicant is flawed in my opinion and I would urge the Planning Officer to ensure the drainage proposals are scrutinized in detail by a suitably qualified and experienced specialist during the consultation process. In order to ensure there is no increase in risk of surface water flooding whatsoever in the surrounding area.

Main points of concern (not exhaustive) based on National Standards for Sustainable Drainage Systems (SuDS) (National standards for sustainable drainage systems (SuDS) - GOV.UK) are:

- The surface water drainage solution relies completely on pumping.

(National Standards (NS) 1.24 to 1.26 states: 1.24 The use of pumping within surface water drainage systems shall be by exception only and agreed with the approving body due to the associated carbon, energy and maintenance implications, and the risks associated with failure and exceedance. 1.25 The need for pumping should be assessed against the use of a lower priority final destination which is achievable by gravity. 1.25.1 The assessment should consider the cost effectiveness of pumping and risk of pump failure, including mitigation against

pollution and flooding. 1.26 Pumping shall only be utilised for any parts of the development that cannot be drained by gravity.

Parts of the site can be drained by gravity, the drainage report does not assess energy, carbon implications and other risks. Pumping

and energy consumption in themselves are not sustainable and the consequences of pump failure or orifice blockage are not assessed.

- Digging a pit and saying the water did not drain away is not the scientific investigation required to determine the infiltration rate is less than 1×10^{-6} m/s as required (National Standards (NS) 3.15.

- NS 3.18 to 3.20 require the greenfield runoff rate to be established and attenuation discharge to the receiving watercourse to be designed on this basis. This has not been done. A discharge rate of 5.2 litres per second has been selected (not based on greenfield runoff rate) but arbitrarily because they claim in 4.2.2 of the drainage report that is the maximum flow through a 50mm diameter orifice.

The drainage report and design suggests this is a minimum permissible size orifice but NS actually states 3.22 Where the peak allowable discharge rate requires flow controls with orifices (or equivalent) with a diameter of less than 50mm, the flow control shall be robustly protected from blockage risks. Regardless of this, the risk of blockage for all flow controls shall be assessed and mitigated against.

5.2 litres per second may be more than the permissible safe greenfield runoff rate. A smaller discharge and therefore a smaller orifice may be necessary with the protections and risks assessed as per 3.22. Other types of flow control devices are available.

Such fundamental misunderstanding of the National Standards is worrying.

- No assessment of the receiving ditch has been undertaken. Where does it flow to? Is it blocked or overgrown? Does it connect with a wider drainage network or is it a closed system that could be overwhelmed during certain flood events? Does discharge into this ditch increase flood risk /flooding downstream /down gradient to other properties ?. Is the ditch actually on the Applicants property? Does the Applicant have the right to discharge into the ditch? Who is responsible for maintaining the ditch alongside the site and downstream? The Drainage Report ignores all these very important questions. I note also that the watercourses and ditches alongside Blakes Lane near its junction with the A4 and along the A4 are constantly overflowing and causing floods every winter. Highways and drainage are well aware of this. Any increase in flooding anywhere locally as a result of this development is unacceptable.

- Table numbers are wrong in Section 4.2.4 of the report or a table is missing so it is not clear the data shows an appropriate level of treatment in the attenuation systems for the hydrocarbons and metals in the surface water that will run off the driveway and parking areas.

- 4.2.5 of the Drainage Report "the 4 pillars" is very misleading. As I have shown above none of these "pillars" can actually be demonstrated. The discharge rate (pillar 1) does not follow greenfield runoff rate principles, the treatment (pillar 2) tables are a muddle, the lack of investigation and data on the receiving

ditch /watercourse means they cannot show any reduction in impact for adjacent places or biodiversity /environment (pillars 3 and 4).

- Flood exceedance routes (NS 3.40) for runoff have not been assessed. From the contours flow will be to the east or south east where there are neighbouring properties.

- There are several other statements in the Drainage Report where the author appears to make comments favourable for the Application that are not actually supported by the facts and adherence to the National Standards. An objective critical review of the report is required.

ECOLOGY

As can be seen from time series satellite photographs on GoogleEarthpro most of the site was heavily overgrown from 2004 until at least August 2025. As such it must have been of considerable ecological and wildlife value. Between 2025 and July 2026 when the ecology survey was carried out, the site was cleared of much of its vegetation. So the Ecology report is not representative of its ecological status and the habitats present just a short time ago.

You can see the site has been cleared from the photos in the ecology report, and actual inspection that I have undertaken. The Ecology Report is clearly a "cut and paste" job from a previous report for another site. For instance 4.1 states there are 8 habitats on site whereas Appendix C lists 4 and the report text describes 5. Section 4.1.1 refers to 7 fields and I don't recognize from site inspection and the photographs that most of the site is neutral grassland or the proportions of grass species. Following site clearance in the last year or so it is clearly being recolonized with thistles, brambles, docks, nettles and weeds which are the species that first start to grow after sites are cleared of dense vegetation. I think the start of 4.1.1 refers to another site.

Just because the trees that are being retained around the site margin retain their bat roost potential does not in my opinion negate the requirement for aerial surveys to determine whether bats use the site for foraging, and how the development might affect their feeding if it was to go ahead. The impact on bats might not be low as claimed if further work is carried out. A full bat survey is required.

In view of the piles of felled wood and brash on the site present after site clearance there are habitats there for reptiles, and a full reptile survey with refugia being placed on the ground at the site and regular inspections should have been undertaken. The potential for reptiles to be present might not be low and the impact on reptiles might not be low.

With both bats and reptiles, if the proper survey work is not undertaken then it is not possible to state that any impact is low. Section 5 of the report contains various reference to a landscaping scheme that will be delivered, however such a "landscaping" scheme is not described in the Planning Statement or elsewhere in the Application submission. Its waffle, probably left in there from the cut and paste nature of the report as described earlier.

CONCLUSION

For the reasons above this Application should be refused.