

A A Butler, Cherry Trees, Cranford Drive, Hurst, READING, RG10 0ET
05/05/2026

Ref: WBC email Date: 13 April 2026, Development Management & Compliance

Revised Plans Consultation Application Number: 253074

Dear Madams and Sirs,

Three sets of comments have now been submitted for this Planning Application, WBC Dates Received 27/01/2026, 15/04/2026 and 05/05/2026. Apart from minor typing and silly date errors, all previous comments remain fully applicable,

Following receipt of your letter Date: 13 April 2026 "Revised Plans Consultation", a second response Date Received 15/04/2026 was promptly submitted. The WBC email/letter gave details of revised/additional Developer's plans for review which included a "drainage-relevant" archaeological evaluation but did not list the Revised Drainage Strategy Report WBC Date Received 14/04/2026, hence my third set of comments specifically addressed this document.

However, with the Developer being allowed to submit yet another revised "Revised Drainage Strategy Report" 01/05/2026 (which I had not previously noticed), I am puzzled as to how this consultation is being managed by WBC Planning? My concern is that by making a late resubmission, the Developer will claim that Interested Party comments made regarding earlier "superseded" documents no longer apply. Hence my apologies for making these after-submission-date-date comments but I feel a response is required in view of the Consultation procedural irregularities.

A quick review of the resubmitted revised Revised Developer's Drainage Strategy Report reveals nothing has materially changed, viz: Fourth comments 1 to 12 follow:

(1) Page 2 Rev E: The disclaimer remains unchanged and commits the Developer to nothing; see screenshot below:

E	30.04.2026	For approval	Fifth issue	RAC/STC
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Disclaimer

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(2) Page 4 Rev E: The Executive Summary remains unchanged still quoting misleadingly small totals for likely roof pluvial catchment area and total built/paved area – only 0.43ha over the 1.16ha greenfield site: see screenshot below:

The proposed development includes the construction of seventeen houses and six apartments with a total roof area of 1,720m² (including 10% urban creep), an impermeable access road with an area of 600m² and permeable paved drives and access road with a total area of 1,570m². A porous paved carpark with an area of 430m² is to be provided for school dropping off as well as general public use.

(3) Page 4 Rev E: The Executive Summary statement still quotes unchanged the incorrect range for the Developer's infiltration test results; see screenshot below:

(Clay, silt, sand) to the north and London Clay to the south. Soakage testing was completed in July 2025 with infiltration values in each test location ranging between 1.8x10⁻⁶m/s to 5.9x10⁻⁶m/s.

Very importantly, this statement does not include (the Developer's) deleted "worst-case" Infiltration Test Report Trial Pit Log INFL4 (7.8x10⁻⁷m/s) or (7.8E-07m/s) taking 40 hours to soak away 1 foot of water – in a site location photographed flooded in March/April 2023 . Also not included in the "range" statement is "best-case" result INFL5 1.2x10⁻⁵ (an "attractive" preferential infiltration-skewing result still apparently included in Developer's data set).(4)

(4) Page 4 Rev E: The Executive Summary still fails to mention "School Road" which means technically the Developer can't be accused of telling a lie as the irrelevant statements do not apply to Hurst; see screenshot below:

There are public foul sewers in Church Road. There are no public surface water sewers.

(5) Page 4 Rev E: The Executive Summary (see screenshot below) refers to The Flood Exceedance Plan in Developer's Appendix E which remains unchanged and does not show the likely storm drainage route west from the proposed car park straight across to the lower opposite side of School Road and into Tape lane.

To accord with LLFA drainage requirements a flood exceedance plan is provided

(6) showing the route flood water will take in the unlikely event of SUDS failure.

Page 6 (2.0) Existing drainage: As previous comment, the Developer's statement for infiltration range encountered during trial pit tests in late May 2025 remains unchanged and is not truthful. Actual trial pit range submitted in the Infiltration Test Report was from 7.8x10⁻⁷m/s to 1.2x10⁻⁵m/s: not as stated in the Developer's screenshot below:

Soakage testing was completed in July 2025 with infiltration values in each test location ranging between 1.8x10⁻⁸m/s to 5.9x10⁻⁸m/s.

A copy of the soakage testing results is shown in Appendix A.

New submissions have been made within Developer's Appendix A regarding soakage test results and comments on these WBC Date Received: 01/05/2026 document submissions,

which supersede the previous “Revised Drainage Strategy Report”, are made separately as “New Comments Addendum”.

(7) Page 6 (2.0) Existing Drainage: Again, no change here in the Developer’s text; Church Road is an irrelevant reference and there are nearby, lower level public surface water sewers in both in School Road and Tape Lane

There are public foul sewers in Church Road. There are no public surface water sewers.

A copy of the sewer records is shown in Appendix A.

Again, no change here with respect to sewers and sewage capacity and handling. A lot more development-specific (or any!) Thames Water information and consents must surely be made available for review – rather than just one out-of-date sewer map with limited coverage of the sewer facilities affected.

(8) Page 6 (2.0) Existing Drainage: Again, the Developer’s statement in the screenshot below remains unchanged and incorrect:

The nearest watercourse is the River Loddon approximately 1.0Km north of the development.

The nearest water course is not the River Loddon both as Red Kite flies and Hurst’s pluvial drainage flows. The Loddon is nearly half a mile from site as the crow flies, and much further as rainwater flows naturally to lower levels – any route to the River Loddon now separated from the site by 50ha and 2m tonnes of general waste leachate and gas producing landfill hills “Hurst Landfill” built-up on previous floodplain a generation ago.

The nearest active EA Main River both as the crow flies and as water can flow anticlockwise south and east around Church Hill, is the Green Man stream flowing tortuously on to the Twyford Brook 4/10 mile away (as the crow flies and annotated Kayersbridge Brook on current GOV.UK Flood maps for planning) and then finally on into the River Loddon .

(9) Page 7 (3.0) Proposed Drainage Strategy: The wording for this paragraph (see screenshot below) has been changed but no evidence is provided of the 12 foot deep hole or trench in Willowmead where groundwater was not encountered. Adding a bit of spin into the text won’t dry out the soggy site. If the implications were not so serious Hurst residents would find this Developer’s revised statement just laughable and incredulous.

Groundwater observations across the site indicate levels typically between approximately 2.0m and 3.6m below ground level, based on the majority of infiltration testing and trial pit records undertaken during a notably wet period. Localised shallow standing water was recorded in isolated locations following prolonged rainfall events and is considered to represent perched or transient conditions rather than the prevailing groundwater table.

Why did the Developer need to change this text at all? With respect to the previously mentioned but now deleted reference to “BGL exploratory holes” claiming to find water at between 2m and 3.6m below ground level as part of a “GESL site investigation completed in March 2026” - this information does not match the Ground and Environmental Services Limited test hole data sheets date 18/02/2026 for WS5, WS8, and WS9, stating ground water level standing at 0.1m (4 inches)BGL, or the narrative and photos included in the Archaeological survey; excavations were inundated with water at only 0.1m (4 inches) below ground level in Trench 6 in the centre of the south/east field and comprehensively covering the whole of the Willowmead site.

It is outrageous to suggest either 2026 has been a very wet spring; flooding at the bottom of Church Hill which closed the road in 2025 and 2024, has been relatively minimal this year – or that when trial pit infiltration tests were carried out in dry late May 2025, that these were notably wet periods. As suggested, to be representative and accurate for winter/spring, Willowmead trial pit testing should be repeated in February/March and in locations specified by WBC Planning with the agreement of WBC as LLFA – March/April 2023 would have been a good time!

“New Comments Addendum”.

(10) Trial Test Pit Locations: In this revised, Revised, Drainage Strategy Report WBC Date Received: 01/05/2025 (but STATUS FINAL date 4th July 2025), the Developer has added an existing map showing preferentially selected, revised, reannotated trial pit locations from the Drainage Strategy Report which provides no new information, viz see screenshot below:

This shows test pits reannotated for the Drainage Strategy as:

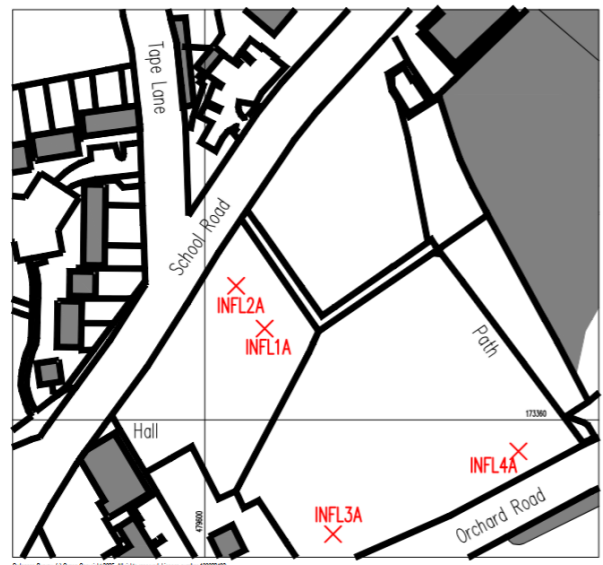
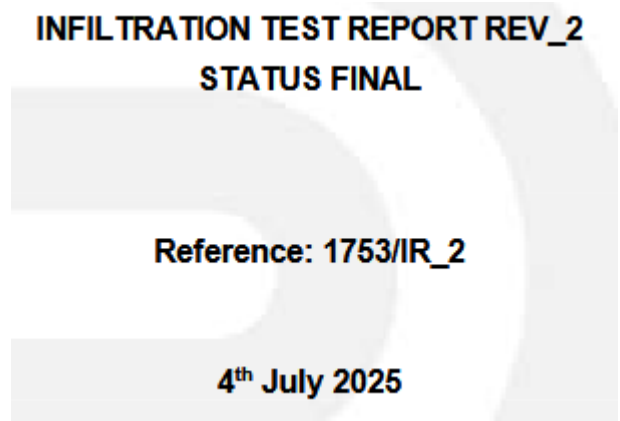
INFL1A (originally test INFL1)

INLF2A (originally test INLF3)

INLF3A (originally test INLF5)

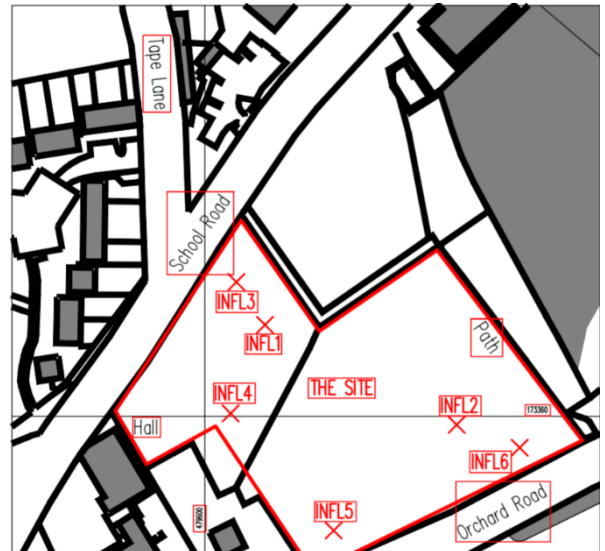
INLF4A (originally test INLF6)

INLF4 the poor-infiltration-result test pit located in the flood prone ponding area of the west field, just north of Willowmead’s boundary fence (see 2023 April photo), has been deleted from the map and not included for use in infiltration calculations based on this unrepresentative “summer” test data.



INFL2 2.24×10^{-6} has also been removed from the map. For easy comparison, see screenshot of the trial pit locations from the Infiltration Report – this test pit location and nomenclature discrepancy is highlighted in original comments made to WBC Planning Date Received: 27/01/2026.

Seasonally realistic February/March retests to obtain more representative infiltration values for the whole site, must include pits near the flood prone INFL4 area, and at the north of the east field near the school, where the archaeologists could not fully excavate their trench as intended due to the speed of water ingress, viz: “Trench 8 (Figs 2, 5 and 6: Pls 13-14) “Initially hand dug for the first 0.40m, the water influx was too rapid to allow digging by hand...”



Importantly, neither map shows a trial or test pit dug near or next to this neighbouring soggy, marshy area north of Vine Cottage – this would be a good place to dig a “wet” test pit or two!

(11) 1.1 Summary and Infiltration Test Results: The screenshot of Table 1 below, a new submission, confirms unchanged what has already been stated in my third set of comments WBC Date Received: 05/05/2026. The Reference annotation has changed slightly – presumably INFL01A is INFL1A, which was INFL1 etc.

1.1.2 The infiltration tests are denoted on the table below:

Reference	Test depth (m)	Infiltration rates		
		Cycle 1	Cycle 2	Cycle 3
INFL01A	2	1.8×10^{-6}	2.4×10^{-6}	-
INFL02A	0.7	2.4×10^{-6}	-	-
INFL03A	0.5	1.2×10^{-5}	5.9×10^{-6}	9.9×10^{-6}
INFL04A	0.75	2.1×10^{-6}	2.1×10^{-6}	-

Table 1 Infiltration test summary

It is clear INFL4, the trial pit with “worst case” “summer” infiltration 7.8×10^{-7} , has not been included in the data set.

The most attractive outlying infiltration “best case” (21/05/2025) trial pit INFL03A (also INFL3A, also INFL5) 1.2×10^{-5} is included in the data set but see comments (3) and (6) above, has not been used by the Developer to define the lower 5.9×10^{-6} upper limit of this skewed summer infiltration range. **The test data anomalies remain unaltered, just more clearly presented.**

(12) Appendix B1 Trial Pit Logs: Four “Trial Pit Logs” (only four out of nine tests) have been added for original tests 21/05/2025 on four test pits INFL1A to INFL4A – presumably because of the typical note at the bottom of each data sheet remarking “No groundwater” (see screenshot below) – which is no doubt is why only these particular logs are being submitted and presented.

Remarks
No groundwater. Ground level interpolated from client's PDF survey

The Developer’s Ground and Environmental Service Limited Window Sampler Log data sheets tell a different story for tests made 04/02/2026 where the similar positioned remarks at the bottom of the data sheet confirm groundwater present only 4 inches below the surface, as found in the archaeological trenching. See screenshot below:

Remarks:
Groundwater standing at 0.1m upon completion. Hole unstable so undertook continuous CPT

Summarising, nothing submitted in the revised Revised Drainage Strategy Report WBC Date Received: 01/05/2025 technically changes the unfeasible, flawed drainage scheme proposed by the Developer or materially affects my previous first, second, and third comments.

To obtain accurate and appropriate pluvial infiltration results for the Willowmead site to ensure a proposed scheme is likely to properly meet Planning Inspectorate Condition 9, infiltration testing must be repeated at an appropriate winter/spring time of year and with sufficient representative test pits located sensibly spaced across the site.

A A Butler 05/05/2026