

Rosebank
Tape Lane, Hurst
RG10 0DP

Email to: development.control@wokingham.gov.uk

For the attention of the Planning Officer,

15 January, 2026

Re: Planning Application 253074

Application for approval of **Reserved Matters** pursuant to Outline Planning Consent 230074 (allowed at appeal APP/X0360/W/24/3342812) for the erection of 23 dwellings with associated access and 15 carparking spaces for the local primary school. Details of appearance, landscaping, layout and scale to be considered.

I wish to OBJECT to this application for the following reasons:

1) Condition 11 - Lack of up to date BNG Assessment and harm to biodiversity

The applicants PEA dated 25th November, 2025 does not include an up to date metric calculation for the site. The last BNG assessment (metric 3.1) for this site was carried out 3 years ago in January 2023 by Collington Winter Environmental ref: CW20-494 RPT 002 for **outline** planning application 230074¹ and just about scraped a 11.47% habitat biodiversity net gain requirement. Since then the application details and baseline have changed.

The applicant applied what appears to be a systemic weedkiller (probably glyphosate) to the site in October 2025 (See Fig 1 & 2) which has changed the baseline of the site considerably. As a result of this action there is a harmful effect to the habitat, prior and ultimately post to development due to the lack of vegetation available to the reptiles and small mammals that rely on this for hibernation and foraging; I suggest this was a deliberate attempt to clear vegetation and change the biodiversity baseline prior to reserved matters being agreed.



Fig 1: Field prior to weed killer application



Fig 2: Field after application of weedkiller October 2025

¹ [PEA Orchard Road Wokingham](#) Collington Winter Revision 1 dated 10 January 2023

Further views of the field pre-weedkilling can be seen in the Applicants Infiltration Test Report which contains images of the field in May 2025² as a meadow.

The applicant's PEA Habitat Survey concludes:

- 3.20 The site is considered to a site of importance for badgers
 - 3.24 The site is considered as valued as being important for roosting bats
 - 3.25 The site is considered as being a currently high value site for foraging bats
 - 3.36 The site is considered to be of importance for Great Crested Newts [The site is entirely within a red risk zone for GCN as modelled by the district licence process. GCN are regularly sighted by locals along School Road and Tape Lane].
 - 3.40 to 3.43 This site is of importance to Stag Beetles.
 - 3.48 Hedgehogs rely on this site for foraging. [There are sightings of hedgehogs regularly in the nearby allotments (<50 metres from site)] and this site is well within their foraging territory.
- **Given the applicants complete lack of empathy and disregard for protection and enhancement of the biodiversity habitat on the site, this proposal should be subject to obtaining a licence from Natural England which is necessary prior to any works commencing and should be the traditional site-based licensing route.**
The applicant should be denied the alternative financial compensation route for the loss and harm to GCN's or any other protected species.
- **Hedgehog highways should be mandatory in ALL gardens and not as suggested by PEA 4.71 on an ad hoc basis which is subjective and derisory.**
- **In addition, under NPPF Paragraph 192 to protect and enhance the very evident biodiversity and geodiversity on and around the site, the developer FAILS to include a wildlife habitat corridor before, during and after the construction, this corridor allows the existing large mammals including foxes, badgers and deer who regularly use this meadow to travel unharmed through and around the development leading from the countryside South of Orchard Road, travelling north to Tape Lane to the land between Lodge Road and Tape Lane as this area is a designated for habitat and biodiversity improvement within the Berkshire Local Nature Recovery Strategy agreed in November 2025.**

2) Condition 1 - Lack of sympathetic design, poor site layout, over-densification and overbearing development causing harm to the traditional character of Hurst.

The dwellings proposed to front School Road (Plots 15 -23) are crowded and overbearing and do not enhance the character and street scene of School Road. None of the existing dwellings in School Road or within the surrounding area are as densely built or so near to the road (the apartments in Dorndon House are set back from the road and encompassed within 1 acre of landscaped grounds with mature trees). This proposal has 'squeezed' in an overbearing building accommodating urban, cramped, apartments and (inadequate) parking in a very small area of land which is totally unsuitable for this part of the site; **The WBC Landscape Officer Report in the outline application 230074 stated that this area on the site was unsuitable for this type of building.** This large, bulky, urban building will be highly visible from the Area of Special Character as you transition from the countryside to the village. It is inappropriate in design, scale and massing.

The barely adequate front gardens (to the properties along School Road (Plots 15 – 23) do not enhance the street scene and due to the removal of 3 large mature trees, to accommodate the access road, will appear urban and completely at odds with the rest of the dwellings along School Road. No amount of landscaping or hardscaping will disguise the fact that these are the utilitarian, uniform, 'affordable homes', built with the

² [ViewDocument](#) Infiltration Test Report May 2025

smallest of budgets, that will never integrate with the rest of the setting along School Road. These are the wrong houses in the wrong place.

The design of the remaining dwellings within the development are also out of character with the rest of the village. The predominant grey framed windows and grey weatherboarding do not reflect the Hurst Design Guide or the existing properties either in School Road, Orchard Road and have no relevance to the buildings and character of the adjacent Area of Special Character and the heritage asset Vine Cottage to the east.

In fact all of the proposed dwellings are so far removed from the character of Hurst that it beggars belief that the applicant believes them to enhance and be characteristic of the village. This estate will have all the hall marks of an identikit housing development – unimaginative and drab in design with no reference to the local character or tradition of Hurst whatsoever and for this reason the application should be refused.

3) Condition 8 - Lack of clarity in the Parking Management Strategy

The Parking Management Plan Strategy OSG Project 25-1791³ Plan states that it is for the ‘General Public’ and yet other submitted plans such as S3 of the proposed Construction Management Plan and the Harwood Tree Planting Plan P03 states that the parking is for the ‘School’. **This needs to be clarified as soon as possible as clearly there are ramifications that will need to be dealt with. Is it for the public or just the school?**

4) Condition 12 - Inadequate detail within the Construction Management Plan

There is clearly a lack of detail and clarity in the application.

- **S5. Neighbourly relations:** The details of the ‘letter drop’ does not stipulate who they consider the neighbouring residents are and who the ‘local groups’ are.
- The residents should have immediate access to the log of complaints, actions and unresolved actions at any time, not when the management think fit.
- **S6. Routing of traffic and access:**
- The Route Map (Fig.5 in CMP) is only ‘suggested’, is poorly thought out, difficult to read as road names in the centre of the village are omitted and it fails to highlight important information to construction vehicles and **therefore not fit for purpose:**
 - There is no route proposed for any construction traffic coming from Winnersh using the B3030. Church Hill is a narrow lane, unlit, unpaved lane popular with ramblers, through a Conservation Area and no construction traffic should be allowed to use this lane as it has a width restriction. Heavy traffic and wide vehicles will compromise the heritage assets (The Castle Inn and almshouses). Signs should be placed at both ends of Church Hill that there is no access for ALL construction vehicles associated with the development.
 - Although showing the ‘suggested’ preferred route, inevitably construction traffic will make their way down Sawpit Road. This is an unlit, unpaved road leading to a well-used public footpath. Again, signs should be installed at either end.
 - The Route Map does not mention that Tape Lane is an ‘Access Only’ lane with a width restriction and the proposed contractor delivery route should have been highlighted with these details in the instructions. The CMP should have included that signage be placed at both ends of Tape Lane stating that there is no access for ALL construction vehicles associated with the development.
- The CMP mentions that collections and deliveries should avoid impacting on the drop-off and pick-up times of the JOHN BULL PRIMARY SCHOOL. This denotes a carelessness on their part, there is no John Bull Primary School – it should of course state ‘ST NICHOLAS CE PRIMARY SCHOOL’.

³ [ViewDocument](#) Proposed Site Plan Parking Management Strategy June 2025

The times of collections and deliveries should also include the pre and post-school activities, not just the school drop off and pick up times.

- It fails to recognise that the **pre-school** is situated next to the construction site and many parents park in the Village Hall Car Park and walk to and from the pre-school to the primary school to collect children between 0800 and 0900 and 1500 and 1600 and will need to pass both access to the site and the contractors limited parking facility. **There is no statement as to how this will be dealt with as this is a safety issue on many levels.**
- The CMP TRAFFIC MANAGEMENT FAILS TO PROPERLY ADDRESS the inevitable queuing of delivery vehicles and where the holding of these vehicles will take place. The suggested average of 3 deliveries a day is unrealistic and having experienced all the delivery issues associated with the recent Sawpit Road development, which was just for 4 dwellings, the CMP needs to define where and when these vehicles will wait. A phone call from the delivery driver, just prior to delivery is not acceptable. The surrounding area has no pathways and narrow lanes which will make parking for waiting construction vehicles dangerous for pedestrians and other road users. School Road is a narrow road, which has regular farm traffic and buses most of the day. Installing a banksman does not mitigate the queuing and parking issues outside the site over the proposed 52 week construction period. **This needs further detail.**
- The CMP fails to address the low-level security lighting required to ensure the wildlife habitat is not harmed by the introduction and continuous use of artificial lighting and light spill. Currently this is an unlit area of Hurst and the Hurst Design Guide states Hurst is a 'Dark Skies' area.
- **FAILURE TO FACILITATE ALL CONTRACTORS to have ONSITE PARKING**
The CMP states that 15 contractors will park near to the Contractor Entrance (Fig. 4 on CMP), however, there will be far more than 15 contractors on the site most of the time and there does not appear to be any further on-site parking made available to accommodate this. This will ultimately end up with remaining contractors parking in the Village Hall Car Park, along Tape Lane, Sawpit Road and School Road, this is antisocial and unacceptable. Additional ON SITE contractor parking needs to be made before any work on this development is allowed.

5) Condition 9 - OUT OF DATE, INADEQUATE and INACCURATE DRAINAGE STRATEGY

- The applicant has failed to take into account in their Drainage Strategy Report dated 12th July, 2025, the WBC S19 Flood Investigation Report 2024 undertaken by JBA Consulting for WBC regarding the Storm Event of March 2023 and other historic flooding events in Hurst.
- Based on an analysis of the rain gauge data from the 6.5 hour storm event on 31 March, 2023, the conclusion of the S19 Flood Report Investigation 2024 was that **Hurst had a 1 in 3 year storm event return period** – not the 1 in a 100 year return that the applicant's Drainage Strategy Report is based on. This together with other evidence means that the calculations for the drainage for this site are inaccurate and unreliable.
- **The proposed drainage strategy is based on conflicting Greenfield Runoff Rates.**
I have compared the Greenfield Runoff rates supplied by HR Wallingford for Campbell Reith for planning application 230074 in December 2022⁴ with the those supplied for RCD on 30 June 2025 and there seems to be a substantial difference in calculations – **the greenfield runoff rate in 2022 is estimated to be far higher than that in the 2025 calculation.** In the December 2022 version the total site area is stated as being 1ha, whereas the RCD Report area is stated as only being 0.421ha. The site is 1.16ha therefore I believe the runoff rates produced by RCD for this application are spurious to say the least and the SuDS calculations based on their greenfield runoff rates should be considered inadequate and should be investigated by WBC prior to any approval given to this application.
- The Drainage Strategy Report has not taken into account that the WBC S19 Flood Investigation Report 2024 highlighted that **Hurst has Very Poor EA and privately owned drainage assets at the**

⁴ [ViewDocument](#) HR Wallingford Greenfield Runoff Rate 22 December 2022

Junction of School Road, Sawpit Road, Church Hill (not Church Road as indicated by the RCD Drainage Strategy Report) **and Orchard Road** (See Figures 3 and 4).

It is highly likely that the proposed surface water runoff soakaways, together with the high ground water table will be **inadequate once every three years** and the SuDS will be reliant on the surplus runoff to be dealt with by inadequate Assets. Subsequently this will exacerbate the flooding already present in the surrounding areas.

Failure of the drainage assets to cope with the surface water might lead the developer to consider using the nearby Main River, Hatchgate Ditch as an alternative method of dispersal of surplus surface water, however, as was evidenced in the latest appeal for 99 dwellings for land in the nearby Tape Lane (dismissed in 2025 as it failed the sequential flood test etc), that this arrangement is flawed and should not be used as a fall back for a major development of 23 dwellings.

- Infiltration does not work in this area! The groundwater levels are high in this area of Hurst (after all Hurst is a floodplain) – it is interesting to note that the infiltration survey was carried out in the driest year on record for decades, with the soakage test taking place in July 2025 – yet no allowance has been made for this in the calculations.

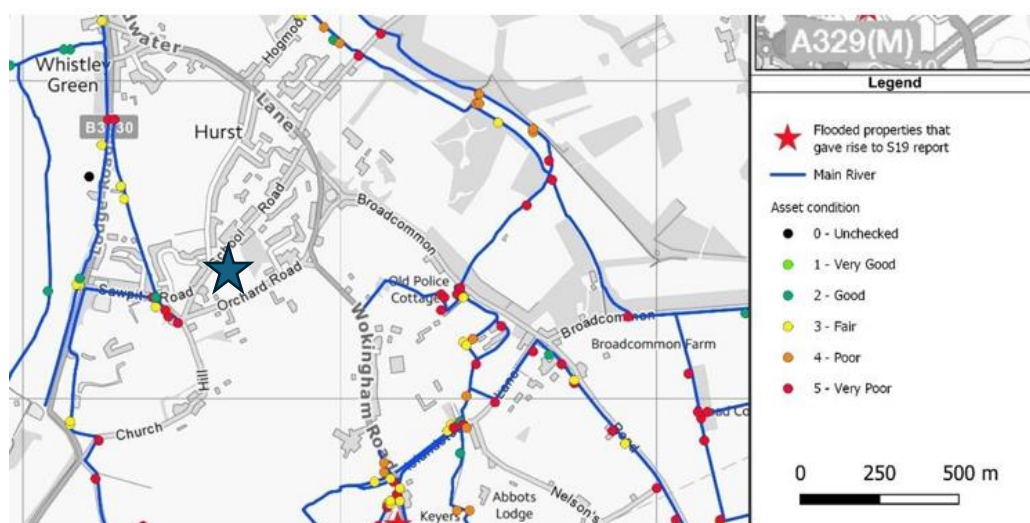


Figure 3 Showing Very Poor Condition of EA assets in Hurst proposed drainage strategy for site is reliant upon.

Application Site = 

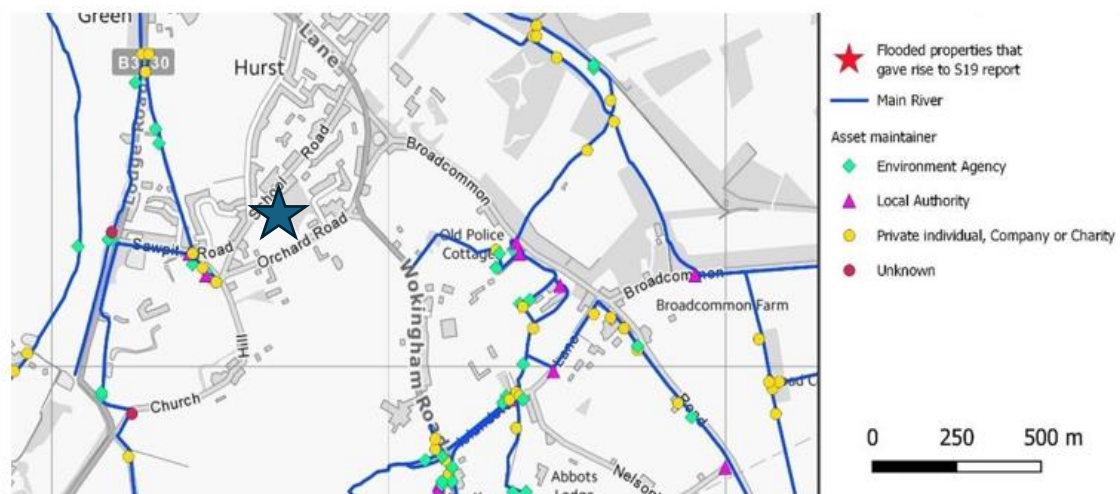


Figure 4 taken from S19 Report 2024 showing ownership for maintenance of drainage assets that the drainage strategy is reliant upon, including private individuals.

➤ **Inadequate Foul Water Strategy**

The drainage strategy has failed to consider that even if the drainage assets weren't inadequate, there will be an increase in loading on the foul sewer pumping station as a result of this development. The WBC S19 Flood Report Investigation 2024, Annex A *Addressing Flooding in Hurst* states:

'The Plan 4. Thames Water: It is widely recognised that Thames Water's pumping station [Broadwater Road] 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.'

Neither Thames Water or WBC have solved the problem since the WBC S19 Flood Investigation Report 2024 has been published. The pumping station now has even more dwellings reliant on it since this statement and the regular flooding of both surface water and foul water down Broadwater Road and the surrounding area is testament to the fact that it is still 'woefully inadequate' and the introduction of a further 23 dwellings, reliant on this pumping station, will exacerbate flooding in the surrounding area. The cost to upgrade the pumping station will be millions of pounds, which neither TW or WBC can afford. Nearby Sawpit Road dwellings and those down Broadwater Lane already suffer from inadequate foul sewage drainage, causing toilets to back up when there is heavy rainfall.

To conclude, this application omits very relevant, important information and detail.

The design and layout are unsympathetic and unacceptable brought about their complete lack of understanding of the local vernacular, historical landscape and biodiversity/ecology of the area.

The CMP is poor and shows lack of understanding of the transport issues and conflicts with narrow country lanes that are unlit with no pathways, and the poor infrastructure in this area for pedestrians, horse riders and cyclists and other road users whose safety will be compromised during this construction.

The drainage strategy has used inaccurate, out of date information, is unviable and incapable of confirming that this development won't exacerbate the already existing flooding issues in the immediate and wider area.

For the reasons given above and the lack of accurate information and detail WBC should refuse this application for reserved matters.

Yours faithfully,

Lou Robinson

