

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

Revised Plans Consultation Application Number: 253074

Dear Madams and Sirs,

Two sets of comments have already been submitted for this Planning Application WBC Dates Received 27/01/2026 and 15/04/2026. My original comments Date Received: 27/01/2026 are still fully applicable, and following receipt of your letter Date: 13 April 2026 “Revised Plans Consultation”, a second response Date Received 15/04/2026 was submitted.

Not then knowing then the overall context of the consultation, or 4 May 2026 end date, or even that further documents would subsequently be submitted by the Developer, my second response to WBC was somewhat rushed. Some typographical, spelling and grammar errors will be mostly obvious, but now given more time, I would like to correct and clarify a couple of errors and statements with respect to my second submission WBC Date Received: 15/04/2026.

Firstly, an important correction, secondly further evidence and clarification regarding Thames Water’s ability to properly supply clean water, and thirdly detailed points highlighting errors in the Developer’s revised [Drainage Strategy Report](#).

Serious questions must be asked and properly answered regarding anomalies with the site soakage testing and infiltration values quoted on [Pages 4 and 6 of the Drainage Strategy Report](#), as this issue fundamentally affects the validity of calculations submitted which falsely attempt to convey that Planning Inspectorate approval Condition 9 has been met.

Firstly: A correction (see screenshot below):

(4.2) The extra clean water supplied to the site by TW will end up in either Thames Water foul sewer system with additional sewage, or as surface water from vehicle washing, window cleaning, jet washing etc. For the foul and grey water discharge, where is the Applicant’s evidence and technical back-up data to show that the existing gravity sewer system to the Sawpit sub-pumping station, and the sub-pumping station itself, have sufficient spare capacity to handle peak flows from the proposed development? And combined with the discharge of Hurst’s other sub-pumping stations (Hogmoor, Wokingham Road) where is the Thames Water evidence the combined peak discharge will not exceed the capacity of the Broadcommon pumping station – resulting in increased sewer surcharging experienced within Hurst at lower level circa 38m AOD 321 main sewer manholes?

When referring to the Thames Water pumping station which is unable to handle peak foul sewage flow out of Hurst, I wrongly referred to “[Broadcommon pumping station](#)” when I meant to type “Broadwater” - in full: Thames Water Broadwater (Twyford) SPS BROAP2ZZ, just off the A321 near the Broad Hinton junction. WBC as LLFA should be aware from comments regularly made in the past by Councillor Wayne Smith and others, that the limited capacity of this facility is known to be a problem and pumping capacity needs increasing to avoid both the current

unacceptable, and probable future increased, Thames Water foul sewer surcharging within Hurst – particularly affecting low lying near 37m AOD Hogmoor Lane near A321 (see S-19 Flood report).

Secondly: A clarification regarding the issue of water supply, which should be of real concern to existing Hurst residents and was raised in second comments (WBC Date Received 15/04/2026 (4.1)) see screenshot below:

(4.1) Where is the evidence that Thames Water can provide the proposed Willowmead site with sufficient clean water?

Hurst Residents' concern, as with flooding, is not whether the existing Thames Water infrastructure may be able to supply the proposed Willowmead development without infrastructure modification, but whether this can be done without causing further harm and nuisance to existing residents at peak periods – particularly breakfast time.

Recently, Monday morning 20 April 2026, again on Sunday 26 April, and again Friday 1 May, there was insufficient Thames Water supply pressure in School Road to enable our simple mains-fed electric "Triton" bath shower to heat - the shower's internal low-pressure protection safely shutting off electricity supply permitting only cold showering. The variable water pressure resulting in fluctuating flow annoyingly making setting an even, constant shower temperature impossible on a Triton or similar water and electricity mains fed "stand alone" electric shower.

To learn more, an external water pressure gauge to measure Thames Water supply pressure just above kitchen ground floor level was fitted Monday evening 27 April 2026 and immediately confirmed significantly fluctuating around 25psi (1.7bar) supply pressure at 19:22hrs. It's early days for monitoring average pressure, and Thames Water have been informed of a problem. However, it is already clear School Road water supply pressure at ground floor level through the day currently appears to be mostly steady at approximately 30psi but typically drops and fluctuates considerably just after 7:00am (breakfast, going to work and school time), also dropping below 30 psi with significant pressure fluctuations early evening around 7:00pm and later. The photo right was taken 2 May 2026 at 08:52am when the supply water pressure off School Road, at internal ground floor level with no usage, varied around 25psi (1.7bar) - which is marginal for upstairs, directly water mains fed, electrically heated, shower operation. This morning 04/05/2026 at 07:26 the force was with Thames Water enabling a steady supply pressure of 38psi to be maintained – presumably due to less usage on a bank Holiday morning. *Note: For Hurst residents wishing to check their water supply pressure, an indicated pressure range of 0-60psi (0-4bar) (as pictured in the photo) is suitable – providing a good central scale reading for 30psi*



For "Lodge Road" Application: 242067 Thames Water stated it would not be possible for the existing potable water supply infrastructure to supply the proposed new development. The

Thames Water letter for Lodge Road Application: 242067 can be found on Page 76 of WBC's App: 242067 documents - Addressed to Wokingham "District" Council, [3 September 2024, our DTS Ref: 77636 Your Ref: 242067 - see page 2 "Water Comments"](#). It appears this response was directly to WBC resulting from WBC's enquiry (which is probably the sensible route to get an accurate believable Thames Water response rather than rely on a response possibly redacted or angled by the Developer).

If Thames Water need to upgrade the clean water supply system to School Road Hurst for the new Willowmead development, shouldn't this sensibly be done before Willowmead building starts (so as not to adversely affect existing residents), and be financed by the Developer's CIL contribution?

It is important to highlight yet again the need for clear responses from Thames Water which should include technical back-up based on the proposed Willowmead finished floor levels up to [39.8 AOD](#) (around 1m above the existing south field site) to avoid serious predictable problems arising in a year or two; water supply problems perhaps preventing occupation of newly-built properties. For information and to save time, a screenshot of part of the Thames Water letter to WBC appears below

Water Comments

Following initial investigations, Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. Thames Water have contacted the developer in an attempt to agree a position on water networks but have been unable to do so in the time available and as such Thames Water request that the following condition be added to any planning permission. No development shall be occupied until confirmation has been provided that either:- all water network upgrades required to accommodate the additional demand to serve the development have been completed; or - a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan. Reason - The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development" The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning

Thirdly: Detailed clarification reinforcing the point that nothing involving Planning Inspectorate Condition (9) has been significantly changed by the Developer's new submissions. The original flawed Infiltration Test Report and Drainage Statement remain on the document file, unaltered and not marked "superseded". Hence it is worth briefly looking at the Revised Drainage Strategy Report, sign-off date 14.04.2026 and WBC Date Received 14/04/2026, to assess whether any significant changes have been made.

Page 2, Disclaimer: The disclaimer commits the Developer to nothing - and if the Developer's documents are accepted by WBC Planning and as LLFA will likely result in a repeat of the recent "Sawpit" experience where the proposed infiltration drainage proved impossible and WBC Planning have approved local discharge of excess surface water run-off into adjacent closed-off remains of Hatchgate Ditch tributaries and towards and onto low-lying neighbours in the "Sawpit" and Lodge Road area.

Page 4, Executive Summary – built area very probably understated: According to the screenshot below, including urban creep, only 0.43ha of this 1.16ha site is to be covered by building and paving – corresponding with 0.428ha used for S1,S2,CP1-CP5 ("permeable" built surface replacing greenfield) apparently used in the infiltration calculations.

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.

The 0.432ha stated above looks like a significant underestimate - if that is the Developer's intended total figure. A quick glance at the site plan indicates more than half the 1.16ha site will be covered with houses, garages, sheds, and associated surrounding paving, paths, patios and roads. Carrying out a quick check of one area the Developer knows is likely to be checked, the allocated public car park, this appears to be accurately assessed at 430m².

However, a quick check elsewhere (to drawing scale) of the combined roof areas of houses, garages, sheds, indicates a direct hard roof storm runoff area of 2279m², with the developer quoting only 1720m². A similar discrepancy is found for paved areas. A quick block check indicates the total site paved and built-on area including roads, paths, patios, all buildings, looks more like 6780m² of greenfield replaced rather than the 4320m² total suggested (screenshot above) by the Developer - more than half as much again. The eyes don't deceive and surely WBC must be reviewing this aspect in detail as it directly affects likely increased storm surface water runoff towards the neighbours and the validity of the infiltration calculations?

From experience, Developer's "for planning" indicative drawings typically show linear dimensions 10% undersized resulting in "as-built" floor plans being < 20% larger, taking up more of the plot green space and increasing roof pluvial runoff. "Sawpit" Little Acre is a classic recent example of this generally accepted planning deception as a normal part of planning procedure. Hurst residents have also experienced this "as-built" growth with WBC's own housing redevelopment at the flood prone Tape Lane junction leading to Barker Court. Pictured in my "second" 253074 comments, WBC Date Received 15/04/2026, the new housing turned out larger than "expected" and existing trees that were to be retained as part of the approved plan had to be removed as well as the elimination of previous green front gardens and the grassy roadside verge. Hence unfortunately, based on consistently repeated "reserved matters" growth experience, is the 6780m² more likely to be exceeded, perhaps covering as much as 80% of the current greenfield site not only displacing existing groundwater but also substantially decreasing existing pluvial flooding compensation and infiltration capacity.

The only definite figure provided by the Developer for house size is the CIL 2,641.7m² figure. This figure, which is meant to include all ancillary buildings, is not easy to check against the submitted drawings – one would need to subtract the first floor area (not separately given) and then add wall thickness, the roof overhangs comprising eaves/soffits and gutters, to obtain the roof pluvial catchment area. The upshot being there is little point in Interested Parties pouring over and checking the Developer's visually undersized "for planning" drawings where typically, like "Sawpit" there is no intention from the Developer and no expectation from WBC Planning that these "expectation management" submissions subject to "reserved matters" will ever be used – **wouldn't it be much easier if the real working drawings with accurate, verifiable dimensions for the completed "as-built" houses, be submitted by the Developer "for WBC Planning approval" at the outset?**

Page 4, Executive Summary – confusing, unrepresentative and unacceptable infiltration test pit data has been presented: This issue is covered pictorially in some detail in previous comments Date Received 27/01/2026 in (2.1) and (2.2) – Summer timing of the infiltration tests is inappropriate. To be valid and representative infiltration tests must be carried out in February/March. The seasonal test data error is further compounded by unacceptable selective manipulation of this "summer" data. See screenshot excerpt below from the Executive Summary:

(Clay, silt, sand) to the north and London Clay to the south. Soakage testing was completed in July 2025 with worst-case infiltration values in each test location ranging between $1.8 \times 10^{-6} \text{m/s}$ to $5.9 \times 10^{-6} \text{m/s}$.

Very importantly, this statement does not include (the Developer's) "worst-case" Infiltration Test Report Trial Pit Log INFL4 ($7.8 \times 10^{-7} \text{m/s}$) or ($7.8 \text{E-}07 \text{m/s}$) taking 40 hours to soak away 1 foot of water – in a site location photographed flooded in March/April 2023.

As per original submitted comments, infiltration testing carried out under dry conditions in late May 2025 (test sheets dated 21/05/2025 and 22/05/2025) will never be representative for Hurst's soggy winter/spring conditions as photographed by AA Butler 1st April 2023.

It is difficult to understand or explain the situation because of confusing unnecessary lack of clarity and changes in test pit annotation between Developer's submitted infiltration reports and drainage statement, and suspected consequent use of preferential skewed test infiltration values for overall infiltration calculations.

Rather than try to understand the Developer's calculations based on incomplete information submitted, it is worth highlighting a few key relevant points regarding the validity of input data upon which all calculation will be based, namely:

- The low infiltration result in Developer's Appendix B2 The **Infiltration Test Report** for trial pit **INFL4 ($7.8 \text{E-}07$) (7.8×10^{-7})** has been discarded and not used by the Developer for The **Drainage Statement**. Hence $1.8 \times 10^{-6} \text{m/s}$ infiltration range limit quoted, was not the "worst-case" measured – INFL4 an unattractive result the Developer understandably might not want to use.
- Ignoring INFL4 result, a better INFL1 result 1.8×10^{-6} ($1.8 \text{E-}06$) has been used to wrongly define the lower quoted range limit as "worst-case" in the current Drainage Strategy

Executive Summary, and trial pit INFL1 in the Infiltration test Report is renamed INFL1A in the Drainage Statement.

- At the more attractive high limit of the Developer's quoted infiltration range, three tests for INFL5 have been included in The Drainage Statement 1.2×10^{-5} (21/05/2026 test) to 9.9×10^{-6} (22/05/2026 test) with the Developer choosing to quote a (22/05/2026) middle test result of 5.9×10^{-6} as the upper range value, and not highlighting the outlying but very attractive INFL5 1.2×10^{-5} test result still included in the Drainage Statement (an attractive outlier not discarded from the Drainage Statement like unattractive INFL4 result). For the Drainage Statement INFL5 has been reannotated INFL3A.
- If as it appears, outlying very good test result 1.2×10^{-5} has been included to assess the Developer's infiltration factor, then the calculated infiltration results will be skewed towards an unrealistic and over-optimistic result – good for the Developer; not good for neighbouring Hurst residents being flooded.
- INFL6 (2.1×10^{-6}) is inappropriately renamed INFL4A in the Drainage Statement, confusingly using similar nomenclature to INFL4 - the discarded "wet" pit (in the area photographed flooded in 2023) and intentionally or unintentionally perhaps wrongly infers the INFL4 poor infiltration test pit result was transferred to and included in the Drainage Statement.

This means out of nine trial pit results originally presented, infiltration results for 7 pits were in the 10 to the minus 6 range, the outlying wet pit result (bad for the Developer) INFL4 in the 10 to the minus 7 range has been removed from the range, and a single outlying good result in 10 to the minus 5 (INFL5) perhaps wrongly retained in the data, but not used to define a lower infiltration range; this (21/05/2026) INFL5 test pit data is itself a misleading outlier. Hence the problem here is what could have been valid data for summer conditions looks as if it is being manipulated and skewed in its presentation by the Developer to achieve false planning approval to meet Planning Inspectorate Condition 9 – where even summer infiltration conditions will not be met.

It is hoped WBC fully recognise the mistake or deception to which a complete disclaimer applies in any case. As per my second comments Date Received 15/04/2026, I feel the Archaeological Report, both narrative text and photos (especially wet, central, shallow Trench 6), together with my own 2023 flooding photos shows that shallow groundwater affects most of the site in winter/spring when further infiltration will be near impossible.

Page 4, Executive Summary, the Developer's statement is incorrect: See screenshot below:

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

In the Developer's resubmission no attempt has been made to correct "Church Road" to School Road. Nor is there any acknowledgement that there are public surface water sewers in School Road, where increased surface water runoff is likely to be discharged. Why have WBC Planning not ensured these obvious errors were first corrected by the Developer before posting this resubmission on the WBC Application 253074 Planning Documents website?

Page 4, Executive Summary, likely Tape Lane flood exceedance path not identified:

Following the previous comment, Tape Lane immediately opposite the Willowmead site, at a lower level, is a likely primary flood exceedance path via the let-down kerb of the proposed public car park. This surface water drainage path is not shown in [Appendix E Flood exceedance plan](#). Like School Road, Tape Lane also has public service water sewers, although it should be noted that these sewers have been overwhelmed and incapable of handling deep pluvial flooding such as in 2023 – pictured in previous comments. Hence the statement made by the Developer (see screenshot below) is misleading and Appendix E needs correction.

To accord with LLFA drainage requirements a flood exceedance plan is provided showing the route flood water will take in the unlikely event of SUDS failure.

Based on Hurst's actual recent flooding experiences the word "unlikely" should be change to "likely".

From the Developer's topographic survey "[Appendix A](#)" WBC Planning can easily verify that, from the proposed School Road access to the public car park at 39.06 AOD, the road surface slopes down across to Tape Lane at 38.61AOD to the north and 38.69AOD to the south. With the existing slight bank removed, local increased Willowmead surface water runoff will flow straight into Tape Lane, a probable flow path not either suggested or shown in the Developer's [Appendix E](#). Alternatively, should not the Developer be required show the detailed flood exceedance site contours around the public car park entrance across to Tape Lane to show why this likely drainage route will not happen?

Recognising that ultimately the whole of central "trapped" Hurst village is connected both over the surface and through sewers (road sewers the Developer states do not exist, and foul sewers as evident by Hogmoor surcharging), this extra Willowmead storm drainage will add considerably to the existing deep pluvial flooding in Tape Lane, Sawpit, etc. Should not the surface water drainage implications of the proposed raised and crammed development of Willowmead involve Thames Water as well as WBC as LLFA in reviewing the flood exceedance limit plans?

Page 6, 2.0 Existing Drainage: The screenshot below provides references to soakage testing completed in July 2025 together with some new data from testing carried out by Ground and Environmental Services 04/02/2026.

Soakage testing was completed in July 2025 with worst-case infiltration values in each test location ranging between $1.8 \times 10^{-6} \text{m/s}$ to $5.9 \times 10^{-6} \text{m/s}$.

A copy of the soakage testing results is shown in [Appendix A](#).

The first statement again highlights and repeats an unrepresentative and skewed optimistic infiltration range which surely must be rejected as nonsense by WBC? Actual trial pit range submitted in the [Infiltration Test Report](#) was from $7.8 \times 10^{-7} \text{m/s}$ to $1.2 \times 10^{-5} \text{m/s}$.

The second statement applying possibly to new 04/02//2026 sampling and in-situ testing data (and not the original infiltration test pits) does reference groundwater standing levels on test completion. Results of 7 tests numbered WS1 To WS9 are included, but with no WS2 or WS3 or location plan to show where the tests have been physically taken, it is hard to attach any value to or see the purpose of this additional information. Groundwater standing levels for three of

the tests WS5, WS8 and WS9 is given as 0.1m or 4 inches, which is consistent with standing water close to the surface with little infiltration capacity recorded in the narrative and photos of the Archaeological report.

Page 6, Existing Drainage: The screenshot below repeats the incorrect statement subject to previous comments.

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.

The sewer map is undated and may be Thames Water's latest version but is out of date; the "Sawpit" development Little Acre is not shown. Much more detailed (or any!) evidence of Thames Water involvement in terms of sewer capacity and Sawpit sub-pumping station capacity is surely required before PI Condition 9 is met and subsequent WBC Planning approval of the drainage scheme?

Page 6, Both Developers and WBC Planning need to recognise there are no EA Main Rivers to the west and north able to drain surface water from central Hurst – they don't exist! Yet again it seems a remote working contractor looks at online OS and EA data which is out of date and wrong and makes the dangerously incorrect misleading statement in the screenshot below:

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

"The nearest water course is the River Loddon" - no it is not; the Loddon is nearly half a mile from site as the crow flies and is separated from the site by 50ha and 2m tonnes of general waste leachate and gas producing landfill hills. The nearest active EA Main River both as the crow flies and as water can flow is the Green Man stream flowing to the Twyford Brook 4/10 mile away - annotated Kayersbridge Brook on current GOV.UK Flood maps for planning.

By now WBC Planning and as LLFA should be fully aware of previous Interested Party concerns and irrefutable back-up data that much official core documentation for Hurst, at all levels of government, is currently seriously misleading. Important detail on GOV.UK flood maps for planning is hopelessly inaccurate, Ordnance Survey Maps not showing Hurst's landfill hills and important changed waterway features, the Environment Agency still showing EA Main Rivers that don't exist on GOV.UK maps, WBC's character descriptions of Hurst's virtually non-existent B1 River Loddon floodplain totally out of date and misleading, etc. Although WBC Planning's refusal decision was very welcome, the recent Planning Officer's decision notice for Hogmoor (App: 260353), in failing to mention Interested Party reports and photos of recent deep pluvial flooding in GOV.UK Flood zone 1 Broadwater Lane (closing the main A321 Twyford to Wokingham road), it gives little confidence that WBC want to be seen to acknowledge or understand the extent of Hurst's largely man-made pluvial flooding problems – flooding which GOV.UK Flood maps for planning often fail to accurately or closely predict.

In this vein the Developer's infiltration report still contains the uncorrected, not superseded Envirocheck document allegedly detailing "Artificial Ground and Landslip" but which fails to

show the true nature of the waste landfill hills west of Lodge Road B3030 – still impossibly showing land which has been first subject to gravel extraction and then filled/piled-up with 2m tonnes of general waste as pristine undisturbed land, but at the same time inconsistently showing the present landfill hill contours! **Surely a lot less time would be wasted by all if WBC put in some expeditious effort to ensure key core documents are accurate and brought up to date, properly recording Hurst's actual flooding history and properly describing the now largely man-made, modified B1 River Loddon valley as it really is?**

Page 7, 3.0 Proposed drainage strategy: The Developer's statement in the screenshot below was surely intended for a different site in another year?

With the exception of the southeast corner of the site ground water levels ranged between 2.0 and 3.6m BGL in the exploratory holes as part of the site investigation completed by GESL in March 2026, following a very wet February.

2026 has not 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. As I write this response, the Ground in Hurst is dry and covered in dehydrated debris including new dry fallen spring leaves with us all probably heading for an early hosepipe ban.

With respect 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 Willowmead south field site.



The screenshots above are again included as a reminder of the seasonal susceptibility of this site to flooding (A A Butler photo 1 April 2023 left – pluvial pond formed north of Willowmead fence). Two nearby local permanent ponds are shown at a similar ground level to Willowmead fields on GOV.UK flood map. These close-by ponds and the adjacent marshy area between the School and Vine Cottage are clearly shown on the OS map, this marshy area apparently becoming worse following the building of extensions to the School. The potential future consequences of a wrong decision made based on false flood risk data will be serious, and

surely the Developer's unsubstantiated absurd claim digging down to 3.6m (12 feet) below ground level is required to reach ground water level at this central Hurst site beggars belief; the statement is totally at odds with both the irrefutable submitted Archaeological report photographic evidence and contractor's trial infiltration pit data sheet evidence, and should be withdrawn.

Page 3, Proposed drainage strategy: based on "Sawpit" experience infiltration will not be feasible: The developer unrealistically sums up an unfeasible drainage strategy in the screenshot below:

Surface drainage discharges to the porous paved drives and the impermeable access road discharges to a cellular storage tank soakaway.

Unbelievably no increased pluvial runoff is apparently to be discharged off site from the proposed development which will have finished floor levels around 3 feet (1m) higher than the present site; it will not be the new houses at increased flood risk (eg: Plot 4 has FFL at 39.8AOD – nearly 3m above A321 Broadwater and Hogmoor Lane near 37mAOD road level. How is this below ground cellular storage tank to be kept empty ready to accept rainfall? In typically winter/spring waterlogged conditions with flooding likely on the existing greenfield site, and during summer thunderstorms, if not already full any onsite cellular storage tank "soakaway" will rapidly fill with rainwater and the excess pluvial surface water runoff will be straight towards the neighbours both over the surface (and ultimately through sewers) from this proposed higher-built, densely-built, and largely paved-over estate. Presumably WBC will at some time be adopting the proposed "permeable" roads, paths and paved areas?

In practice the thorough complex maintenance procedures described in "[Appendix F SUDS operation and maintenance schedules](#)" are probably unlikely to be carried out. It is more likely the porous surfaces will become rapidly blocked with moss, leaves and road silt, and initial porosity will rapidly reduce. Has a factor been built in by the Developer for this certain loss of infiltration?

As this comment is being written 4 May 2026, here in Hurst along the kerb of the main A321 by the Hurst village sign and Recreation Ground entrance opposite the Hurst Cricket Club, the roadside is still clogged with 2025's autumn leaves and debris - not yet cleared or swept by WBC or anyone else in months.

Surely, we need to be realistic regarding what maintenance will be achievable – like "Sawpit" using a false, unproven, "smoke and mirrors" theoretical desk study may be convenient for the Developer and WBC as a way of achieving a planning approval. But in the real world, and for many reasons (mainly confused responsibility and ownership, parked vehicles in the way etc. and cost), based on current experience there will be in practice be only limited maintenance and any paving porosity will rapidly deteriorate. It would be better if the likely issue of "lack of maintenance" were to be recognised now at the design stage by those who will ultimately be held responsible for the approval of a scheme certain to cause significant future increased surface water runoff and flooding problems in lower residential areas of Hurst.

In summary, much of the premise or basis for the Developer's latest "[REVISED DRAINAGE STRATEGY REPORT](#)" is simply wrong - hence would it not be the reasonable thing to do for any planning authority not to accept such a technically flawed document as a basis for

approval of a feasible drainage scheme enabling App: 253074 to meet Planning Inspectorate Condition 9?

There will be increased pluvial surface water runoff from a heavily developed previously greenfield Willowmead site and consent to discharge is a PI Condition 9 requirement for approval. Key authorities and interested parties who should be properly informed and involved with drainage scheme consent, are of course Thames Water and WBC as LLFA, but should not riparian owners in lower-lying near-37mAOD properties adjoining the now closed-off "Sawpit" Hatchgate Ditch tributaries, and in sewer surcharging near-37mAOD Hogmoor most likely to be affected by increased flooding and sewage surcharge problems, also be involved, identified and consulted by WBC Planning or WBC as LLFA?

Reducing River Loddon Pollution: Looking to the future, articles recently appeared in the national press "Thames Water sewage dumping is killing rare chalk stream" - specifically referring to the only north flowing chalk stream in the UK that runs immediately west of Hurst - the River Loddon. With pressure groups forming and increased attention on river pollution and an ongoing court case, it will be just a matter of time that authorities other than Thames Water will come under increasing scrutiny for who actually is responsible for making pollution-resulting decisions. In reviewing WBC's planning applications and finding significant core data errors in key documents with apparently no action being taken by government authorities (with Thames Water currently getting all the blame for bad outcomes), I felt the need to express my feelings to the press in an unpublished letter, namely:

It's very easy just to blame Thames Water sewage dumping for killing the River Loddon chalk stream. Hurst village residents increasingly experience the situation where the sewer system reaches capacity resulting in surcharging to the River Loddon and Thames. Discharge not just of sewage but also leachate from waste landfill piled up between the village and the River. Yet the Government's agency for implementing policy, the Planning Inspectorate, has approved dense building which the beleaguered water company will have a statutory duty to connect to the sewage system regardless of capacity or consequences. Are not the real villains here the Government and their agencies? The Government imposing unrealistic housing targets and rolling out GOV.UK Flood maps in March 2025 which revise and now hopelessly underestimate flood risk "for planning". Local planning authorities without the will, time, or necessary technical expertise, wrongly approving Developer's impractical, virtual drainage schemes. Hopelessly inaccurate Ordnance Survey topographical maps not annotating Hurst's 2m tonnes 50ha waste landfill replacing original River Loddon floodplain, not showing the waste hill contours or the prominent landfill perimeter segregation ditch. The Environment Agency who apparently are unable to remove EA Main Rivers or ditches to the River Loddon buried by landfill for over a generation from still appearing active on GOV.UK online mapping. Thames Water has its many faults, but whoever would want to be a water company amid this jaw-dropping official regulatory incompetence?

Perhaps a bit harsh or not? But this subject of river pollution is not going to disappear and should be considered and perhaps be given greater weight when making and considering the long term effects of today's planning decisions involving drainage.

I do hope WBC Planning and as LLFA can achieve a more appropriate overall scheme for the sensitive Willowmead fields site, a scheme which perhaps might include sensible flood compensation and hold-up swales actually within the site and refuse this materially unchanged Planning Application: 253074.

A A Butler 04/05/2026