

Application Number: 253074 – Amended (documents as submitted by 17 April)

Address: Land adjacent to School Road and Orchard Road, Hurst, RG10 0SD

Proposed Development:

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 car parking spaces for the local primary school. Details of appearance, landscaping, layout and scale to be considered, *plus details for discharge of conditions 5 – 12 of the Outline Consent* ⁽¹⁾.

1. *Note : did not form part of original application description*

Consultation Period Ends: 4 May 2026

PROCESS

The Parish Council is concerned by the extension of this application to allow such a large body of material new information to be submitted by the applicant. We understand that there will often be revisions made to plans during the Reserved Matters stage, as applicants respond to issues raised by consultees. However, we believe that in this case the scale of the new information submitted by the applicant – over 40 new documents to date, including significant additions (e.g. BNG strategy) as well as amendments - far exceeds that which can be considered fair and reasonable, and calls into question the validity of the original application. The Parish Council believes that this application should have been refused and resubmitted when all of the information required was available.

DETAIL

The Parish Council objected to this application on three specific Reserved Matters, where we believed that the proposals needed to be significantly amended to conform to WBC planning policies:

01 – Design Statement

08 – Parking Management Plan

09 – Drainage Strategy

We set out specific objections in each of these areas in our submission to the original consultation, and these are included in the Appendix attached to this submission.

None of these objections has been addressed in the additional or revised documents submitted by the applicant. All our objections therefore stand, and we urge the Council to address these issues urgently and ensure full compliance with all WBC planning policies.

Some additional comments on these matters, based on the revised documents submitted by the applicant, are set out below.

01 – Design Statement

All the comments and suggestions submitted by the Parish Council, and by a large number of Hurst residents, about the design of the proposed development have been completely ignored. We pointed out that the proposed development did not conform to the objectives of Section 4 of the WBC Design Guide and the guidance in Section 12 of the Design for Hurst. We see no evidence in the applicant's new submissions that there is any intention of even attempting to conform to these design policies.

We accept that the applicant has permission to build 23 dwelling units on this site. However, we urge the Council's officers to ensure that these are built in full conformity with its own design policies, and specifically that the development "*responds to its context*" and "*creates a sense of place that is distinctive and memorable and help to enhance the character of the surrounding area*". The current application manifestly fails to do so, and the proposed materials palette in particular should be refused for these grounds.

Our concerns about the positioning of units 15-23, and resulting noise and privacy issues, have also not been addressed, and we urge a re-think of the positioning of these flats, setting them back further from School Rd.

08 – Parking Management Plan

None of our concerns regarding the car park have been addressed in the applicant's revised parking management strategy: there is still no detailed specification; the risks remain around possible non-completion of the car park; and both the length of the maintenance period and identity of the new owner at the end of this period, responsible for maintenance costs, are not addressed.

However, we do note the following comment in para. 7.0 of the applicant's Drainage Strategy : "*The school or Local Authority will be responsible for maintenance of the porous paved offsite car park*". We suspect this will probably be news to both the school and WBC.

09 - Drainage Strategy

We note and are extremely concerned that the revised Drainage Strategy still does not include any provision for exfiltration. The applicant's assertion that "*attenuation storage volumes are not compromised by groundwater ingress and will remain fully effective during storm events*" is not realistic and will be found out by the first period of sustained heavy rainfall. (Recent experience of flooding in Hurst has confirmed that "no plan survives first contact with the enemy".)

The plethora of infiltration devices proposed by the applicant will be overwhelmed, and it is inevitable that there will be a future application for connection of the site to external drainage, specifically the already overloaded Hatchgate ditch system. Exfiltration, and mitigation of the impact on the existing drainage system, needs to be dealt with now, in the context of this application, not in response to flooding in the future. Otherwise, there is a real risk not just of flooding on this site and in the surrounding areas, but also of flood water gaining access to foul sewers, causing these to back up, as has happened increasingly frequently in recent years in Hurst.

Other matters

In addition, we believe that the revised Landscape and Ecological Management Plan submitted by the applicant on 10 March does not satisfy Condition 11 of the Appeal decision. We also question the BNG baseline used in the applicant's models, given the habitat destruction on site by the applicant in 2025 (and we note the applicant's refusal to produce any metrics to support its BNG data).

SUMMARY

The Parish Council believes that the additions and revisions to this Reserved Matters application still fail satisfy a range of relevant and important planning policies, in particular in respect to layout and design, parking management, flooding, and bio-diversity.

We therefore strongly urge WBC officers to engage with the applicant to enable further additions and amendments to be brought forward that address these policy areas, preferably in a new application that enables full scrutiny by statutory and public consultees.

St Nicholas Hurst Parish Council

22nd April 2026

APPENDIX (detailed_submission of 7 January 2026)

01 – DESIGN STATEMENT

The Design for Hurst (Section 12, page 24) sets out the following guidance to support WBC Local Plan policies:

- The local character and historical context of the buildings in Hurst can be reflected in design and the way that materials are used to give acceptable proportion, mass and detail in them.
- Stimulus for the design and construction of new buildings of originality will come from recognition of the merit of local traditional materials and vernacular style, shape and proportions.
- A sympathetic variety of house types and details lend interest to the street scene.
- Modern buildings, whether in design or in the imaginative use of traditional materials may be accepted where they enhance the location and add to the quality of the environment.

The Applicant's own Design Statement provides a good summary Key Character Elements of Hurst village, reflecting the wide mix of building styles, architectural features and varied materials palette. Although the Design for Hurst document is not explicitly referenced by the Applicant, the Key Character Elements identified by the Applicant are consistent with the description of Hurst in that document. (The very diverse materials palette seen in Hurst does now include some limited recent use of black weatherboarding on one development, which post-dates the Design for Hurst document, although that is not shown in any of the Applicant's photographs.)

The Applicant's Design Statement, however, also uses the assessed Key Character Elements of Twyford as part of its Guiding Principles. The Applicant should be aware that Hurst and Twyford are separate settlements, and substantially different in terms of age, size, layout and design. The character of Twyford is not relevant for the design of a development in Hurst and should not be used by the Applicant to guide the design of this development.

Layout

We consider that it would be preferable to set units 15-23 further back from School Rd. This is a busy road, with a lot of vehicle and pedestrian traffic, in particular at school drop-off and pick-up times, and the new homes will be significantly affected in terms of both **noise** and **privacy** (both of which are subject to various WBC Design Guide and other planning criteria).

- ***The Parish Council asks WBC to assess the position of units 15-23 specifically in respect of the noise and privacy aims of the Design Guide, and ensure that they are set back far enough from School Road to minimise these impacts on both residents and passers-by.***

Materials Palette

Having identified the Key Character Elements of Hurst reasonably well, in broad conformity with the Design for Hurst, the Applicant then seems to have completely ignored these in respect of the

proposed materials palette! There is almost no diversity in materials used and no reference to the existing Hurst materials palette. Every single housing unit comprises:

- RAL 7016 casement windows
- Cream stone cills
- RAL 7016 composite vertical panelled doors
- C18 slate grey weatherboarding

The garage doors on the larger units also all seem to be anthracite grey.

There is excessive use of the slate grey weatherboarding, large areas of which are included on almost all the buildings. The appearance of the whole development is dominated by this weatherboarding, its uniform greyness exacerbated by the identical anthracite windows and doors on every home.

There are no sash windows or dormer windows in the design, and no external timber framing, despite all of these having been identified in the Applicant's own Key Character Elements analysis. There is no mixing of brick colours or patterning in the brickwork, and no reference to the various vernacular styles prevalent in the village, as highlighted in the Design for Hurst.

In summary, in terms of the uniform materials palette, the unimaginative sameness of design, and the lack of diversity of feature or colour, this development could be anywhere in the country. It certainly does not reflect the current character and appearance of Hurst. It also makes no reference to the Key Character Elements which the Applicant itself identified for Hurst. It manifestly does not "*respond to its context*" or "*create a sense of place that is distinctive and memorable and help to enhance the character of the surrounding area*" (WBC Design Guide, Section 4).

➤ ***The Parish Council requests that WBC rejects the uniform materials palette component of the Applicant's Design Statement and instructs the Applicant to develop a diverse materials palette that reflects the clear objectives of Section 4 of the WBC Design Guide and the guidance in Section 12 of the Design for Hurst.***

08 – PARKING MANAGEMENT PLAN

The Parking Management Plan relates to the 15-space public access car park, provision of which is an undertaking by the developer that forms an integral part of the approved development plan. The Parish Council has three concerns regarding the proposed Parking Management Plan:

- i. The detailed specification of the car park has not been included in the Plan; rather, there is just an undertaking not to commence work on the development until a detailed specification has been approved in writing by WBC. In our view, a detailed car park specification should be available as part of this Reserved Matters application. Conforming to the rest of the development, this specification should exclude any form of street lighting.
- ii. Under this Plan, the Applicant will not be obliged to commence construction of the car park until the 20th (out of 23) dwellings in the development is occupied. In our view, this constitutes a material risk that the car park will not be constructed or will be constructed to a specification inferior to that initially agreed.

- iii. The car park will be maintained by the developer for an initial “Maintenance Period” after which responsibility for maintenance will be transferred in perpetuity to a management company. The length of the maintenance period is not specified, and no details are provided about the management company, and how this will be constituted and funded. In our view this gives rise to a risk that the costs of maintaining the car park will end up being borne by either WBC or SNHPC.
- ***The Parish Council requests that WBC rejects the Parking Management Plan and instructs the Applicant to deliver an amended Plan that addresses the three points set out above.***

09 – DRAINAGE STRATEGY

Flooding has become an increasingly serious problem in Hurst, and roads adjacent to the site of this development have been badly flooded in recent years, including Orchard Rd and Tape Lane. It is therefore imperative that the drainage strategy for this development is effective, to prevent a further worsening of the flooding problem in the village. The key issue is not flooding on the site itself, but the impact of the site drainage strategy on locations downstream from the site.

During 2025 both the Environment Agency and WBC updated their flood risk assessment data. This followed several winters of severe flooding, and new information being brought to light by an S19 Report into a severe flooding event in 2023, and further analysis during a lengthy planning appeal in 2025. It is not clear that the Applicant’s Drainage Strategy Report takes account of the updated information now available. For example, the applicant is still working to 1 in 100-year risk of flooding, whereas the S19 Flood Report concludes that there is a 1 in 3-year risk of severe flooding.

- ***The Parish Council requests that WBC confirms that the Applicant’s Drainage Strategy is based on the most recent data and analysis available from both WBC and the EA.***

The Applicant’s proposed Drainage Strategy relies on use of infiltration, porous driveways and soakaways only to manage surface water run-off. There is no provision for exfiltration to existing ditches or drains. This is unrealistic - Hurst has a high water-table!

The recent development of the four new houses on Sawpit Lane, 200m from this site, also relied on these same SUDS options. However, within a matter of months after occupation, an application was made to connect the site to the Hatchgate Ditch (via a pipe across Church Hill), as the SUDS used could not manage the volume of surface water created during heavy rain.

It is inevitable that if the Drainage Strategy is implemented as proposed at this site, an application will follow subsequently for a connection to the existing drainage system, with the water almost certainly ending up in Hatchgate Ditch. Recent planning appeals have highlighted the shortcomings of Hatchgate Ditch after heavy or prolonged rain, and these will be made substantially worse by the addition of 23 new houses upstream.

- ***The Parish Council requests that WBC rejects the Applicant’s Drainage Strategy and instructs the applicant to develop a drainage strategy that recognises the need for***

connection to existing drains and watercourses; and proposes methods to mitigate the adverse downstream impact on the of surface water exfiltrated from this development.

OTHER MATTERS

The Parish Council has no material comments regarding the other conditions in the application.

However, we would urge WBC to ensure that the other conditions proposed are implemented in conformity with the application, in particular the Landscape and Ecological Management Plan and the Construction Management Plan.

In respect of the Landscape and Ecological Management Plan, we note that the whole site was sprayed with weedkiller in the autumn, and while this might have facilitated some of the aspects of the site survey work, it did not demonstrate the level of environmental awareness that is reflected in the proposed Ecological Management Plan (e.g. protection of existing trees and roots, sympathetic native tree, hedge and wildflower planting).

The Construction Management Plan envisages that the development will take up to 52 weeks to complete and so there is a lot of scope for disruption for the Primary School and pre-school, as well as nearby residents, users of the village hall, and passers-by. The Plan sets out the ways in which this will be minimised (deliveries outside school hours, on-site parking for builders' vehicles, specified working hours, etc.) and it is essential that these are adhered to by the applicant and its employees.

It is also essential that all construction traffic is made aware that Tape Lane is access-only and this road should therefore not be used by any construction traffic whatsoever. (This is single-lane road and sees a lot of pedestrian traffic, particularly at school drop-off and pick-up times.) The Parish Council expects this to be enforced both by the developer's prime contractor and by all relevant authorities.