

PLANNING REF : 253074
PROPERTY ADDRESS : 2 Nursery Close
: 2 Nursery Close Hurst, Reading, British (United Kingdom)
: RG10 0EQ
SUBMITTED BY : Mr James Kiddie
DATE SUBMITTED : 20/01/2026

COMMENTS:

My wife and I have lived in Hurst for over 30 years. Our two sons went to school here. I believe this proposed development directly contradicts both the National Planning Policy Framework (NPPF 2025) and Wokingham Borough Council's comprehensive "Design Guide."

1. Flood Risk.

1.1 The Drainage Strategy Report (DSR) states that, with regard to surface water, "Attenuation involves the storing of surface water within pipework or underground storage tanks prior to controlled discharge into the public system. The DSR Executive Summary states that "There are no public surface water sewers." This is a clear contradiction.

1.2 The current design shows pre-cast concrete soakaways on DRG1111-2530-CIV-10 but says this "...could be changed to cellular storage tanks." In either case these systems will fill after prolonged rain and must allow some onward flow to somewhere. SA1 comprises 3x2100 diameter PPIC's. These are soakaways with no sign of onward flow. When they eventually fill where will the flow go?

1.3 If cellular storage tanks are used it is important to note the description of a typical system by the manufacturers (for example SDS Water Infrastructure Systems). In their promotional literature they say, "The stored water is gradually released in a controlled manner into the surface water drainage system or directly into watercourses, reducing the risk of upstream and downstream flooding."

1.4 The DSR shows in Section 5.5 that the outlet water flow will be attenuated by a vortex flow control. Increasing flow means increased differential pressure across the vortex and this reduces or modulates flow. This is a simple, reliable type of control, but it shows again that it relies on a forward flow in order to operate. The DSR states in Section 4.0 that, "Attenuation should be positioned as close to the outfall as possible and would control the surface water discharge from the site." The DSR does not identify a suitable watercourse, probably because there isn't one. No discharge or onward flow is shown in DRGs 1111-2530-CIV-10 & 11.

1.5 Wokingham Borough Council produced an S19 Flood Investigation Report following the severe floods in 2023, which showed that Hurst has a flood event risk of 1 in 3 years on land which includes the proposed site. This throws into question the DSR and the figures on which it is based.

1.6 In their Drainage Strategy Report, Peter Baxter Associates state in Para 1.3.3 that "Due to the low permeability [of the soil] less than three cycles of flooding was (sic) carried out at some of the pits." Not only were there less than three drainage test cycles, but 5 out of the 8 infiltration rate calculations were based on extrapolated graph readings.

1.7 The DSR says "The infiltration rates were calculated as defined in BRE365. "However, BRE365 clearly states that "Results of incomplete tests should not be extrapolated...If the water level does not drop below 25% of the original water level this can be an indication of a

high groundwater table or an issue with the infiltration rate of the soils in the lower section of the pit."

1.8 BRE365 also states that, "Ideally the test should be undertaken during the winter...Even better taken after a period of rain." By conducting the infiltration tests in late May the conditions were very favourable for obtaining compliant results.

1.9 The recent development of four houses on Tape Lane near this site relied on SuDS to suggest there was no flood risk. Within a matter of months an application was made to the connect the surface water to nearby Hatchgate Ditch as the Flood Risk Assessment was clearly

inadequate. SuDS ensures that a site will not flood. It takes no account of downstream drainage. Incidentally, there is no flow in Hatchgate; it is completely blocked.

1.10 The NPPF states in Planning & Flood Risk Para 182(C) that applications must, "have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development." In section 7 the DSR identifies numerous responsibilities for up to 25 years. This is not "the lifetime of the development"

2 Achieving well designed places

2.1 The NPPF (Para 131) states, "The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve." As the Hurst Parish Council (HPC) have so well described in their objections this application appears to fly directly in the face of this fundamental requirement.

2.2 The NPPF (Para 132) states that, "Design policies should be developed with local communities so they reflect local aspirations, and are grounded in an understanding and evaluation of each area's defining characteristics." Again, as the HPC have highlighted, this application appears to be diametrically opposed to the NPPF.

This application is ill prepared and lacking in accurate detail. I trust that these points will be carefully considered and the application rejected.