

PLANNING REF: 252934

Land at Lodge Road, Hurst, RG10 0SG

Full application for "the proposed erection of 3 no. detached dwellings with associated access, parking and landscaping and creation of a balancing pond."

OBJECTION

Submitted by: Andrew Dolinski

34 Martineau Lane, Hurst, Berkshire, RG10 0SF

Date submitted: 7 February 2026

My wife and I have lived in Hurst for 23 years. Our property is within 100 metres of the site subject to this speculative planning application, an application to which **I strongly object**.

GROUNDINGS FOR OBJECTION

The residents of Hurst and Whistley Green are united in their opposition to this speculative development. I concur with their many grounds for objection.

However in particular I wish to cite the following:

- The proposed development is on a greenfield site and falls **outside** the development limit of Hurst, and is therefore contrary to Wokingham Borough Council's (WBC) core strategy CP11. None of the exemption categories under the National Planning Policy Framework (NPPF) have been met.
- The site has not been allocated by WBC for housing and plays an important role in maintaining the open countryside along Lodge Road, separating the settlements of Hurst in the south from Whistley Green in the north. This visual gap must be maintained.
- The site is not in a sustainable location. Hurst and Whistley Green are semi rural settlements with few quality services, for example there is no doctors surgery, no pharmacy, no dentist. Whilst each settlement has a pub, there is only one small convenience store and a primary school. There are no secondary schools nor larger supermarkets within walking distance and transport links are poor. Only basic daily needs are met by the services within the settlements. Everything else requires transportation outside. The existing bus service is unreliable, as confirmed by Thames Valley Transport. The households will have an over reliance on their cars. Accordingly, this development does not comply with WBC core strategy policies CP1, CP3 and CP6.
- The proposed development is on an important wildlife corridor. The development of the site would result in a loss of an important bio diverse rural habitat in which all manner of flora and fauna cohabit and which adds to the semi rural aspect of Hurst and Whistley Green.
- The proposed development is likely to add undue strain upon the existing services to neighbouring properties in Hurst and Whistley Green, namely water supply, surface water runoff discharge and sewerage disposal.

- The applicant has admitted that the majority of the site is in the Environment Agency (EA) **Fluvial Flood Zones 3 and 2**. Accordingly under the NPPF they are required to carry out a Sequential Test, which they conclude they would fail. In doing so they erroneously attempt to rely upon passing the Exemption Test, thereby relying upon mitigation within areas affected by fluvial and pluvial flooding rather than avoidance of development. Additionally their drainage plans are devoid of detail and cannot prove that the proposed development would be safe from flooding for its lifetime, nor contribute to neighborhood flooding. These are clear and undisputable reasons for refusal. (see detailed discussion of the applicant's proposals below.)
- The applicant states that it would be uneconomic to connect the development to the public sewers situated 120 metres to the south of the site. They instead propose to discharge treated effluent into the ditch on their eastern boundary. Not only have they not provided evidence that they have sought the permission of the Environment Agency to do so, their plans do not comply with Statutory Guidance ("The Binding Rules") which state that "discharges must be made to a watercourse that normally has flow throughout the year". The ecology report submitted by the applicant, dated April 2025, states that in April 2025 "the ditch was found to have fully dried out".

The applicant's foul water drainage strategy is not fit for purpose and would be illegal to implement. (see detailed discussion of the applicant's proposals below.)

- The applicant has submitted an Environmental Desk Study. The report "identified a potential contamination concern "due to the possible presence of ground gases which may have migrated away from the degrading waste (at the landfill site to the northwest, west and southwest) of the site". Most damningly the report states that "there could be some degree of unacceptable risk to receptors; principally future site occupiers".

Given that the waste in the adjacent landfill site is likely to continue to degrade for many years to come, it is inconceivable that planning permission should ever be given on this site for the foreseeable future, not until such time that the risk of ground gases has been proven to have ended.

- In 2020, this same site had an application for five houses firmly rejected at appeal by a Planning Inspector (APP/X0360/W/3194044).

The reasons then given by WBC and the Planning Inspector to refuse that previous application should be applied to this new application. Little has changed in the intervening six years.

In the closing words of the 2020 Planning Inspector:

"The proposed development simply fails to address the fundamental shortcomings associated with the appeal site. Put simply, this would be the wrong development in the wrong place."

Prophetic words which continue to apply.

Conclusion

Whilst the applicant has laid what they consider to be the perceived benefits of the proposed development, I and many others are of the firm opinion that such perceived benefits **DO NOT** outweigh the considerable harms caused by it.

Accordingly the application must be **rejected**.

REVIEW OF THE APPLICANT'S DRAINAGE & SEWERAGE STRATEGY

Fluvial Flood Risk

The Environment Agency (EA) Flood Map For Planning confirms that the site is in **Flood Zones 3 and 2**, with the overwhelming **majority** of the site in **Flood Zone 2**.



Flood map for planning

Your reference: Unspecified
Location (easting/northing): 479296/173579
Created: 14 October 2025 11:03

Your selected location is in flood zone 3, an area with a high probability of flooding.

This means:

- you must complete a flood risk assessment for development in this area
- you should follow the Environment Agency's standing advice for carrying out a flood risk assessment (see <https://www.gov.uk/guidance/flood-risk-assessment-standing-advice>)

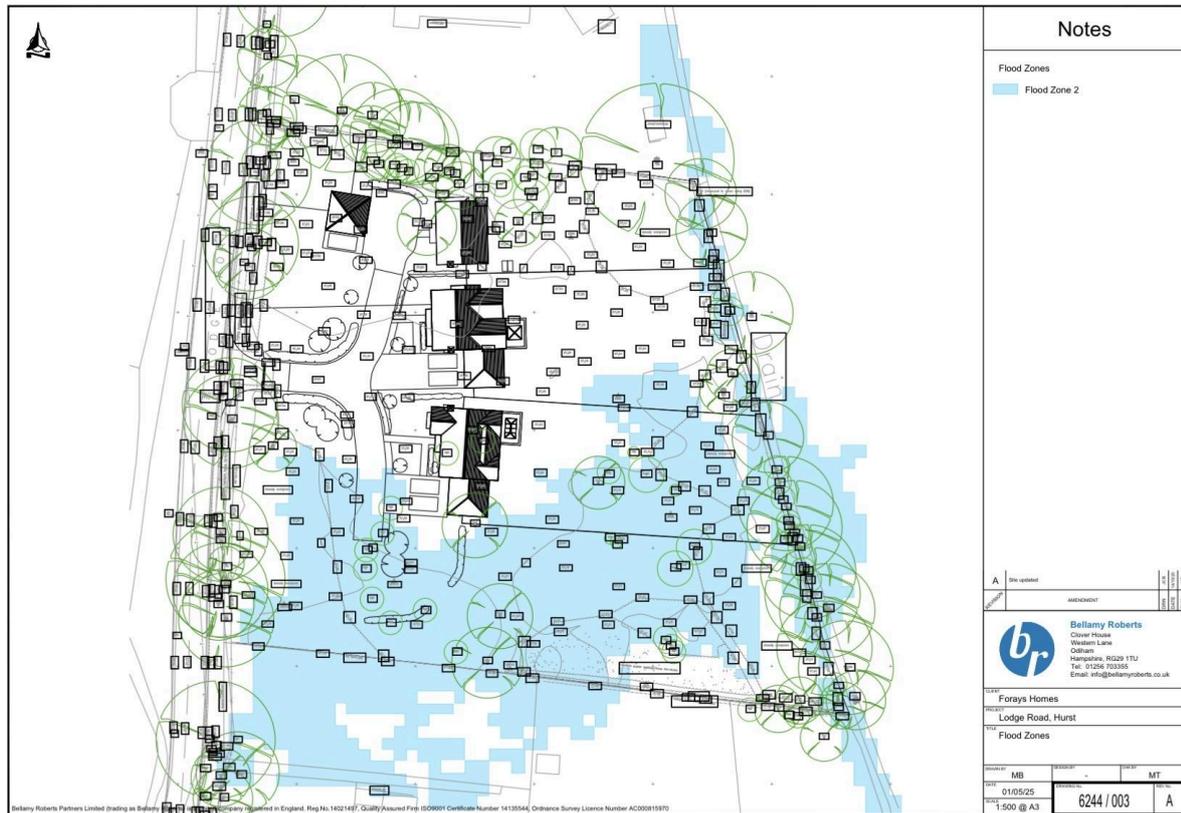
Notes

The flood map for planning shows river and sea flooding data only. It doesn't include other sources of flooding. It is for use in development planning and flood risk assessments.

EA Fluvial Flood Risk Acknowledgement Flood Risk Assessment (Page 36, Appendix 5)



EA Flood Map for Planning (Fluvial & Pluvial) Flood Risk Assessment (Page 7)



**Fluvial Flood Risk (showing encroachment upon proposed houses)
Flood Risk Assessment (Page 39, Appendix 6)**

When looking at the above maps and diagrams it is hard to imagine that there can be a less appropriate site within the borough on which

Surface Water Flooding & Drainage

Surface water flooding is an issue many residents of Hurst are increasingly concerned about.



Surface water flooding on the field adjacent to the applicant's site (February 2026)

The applicant acknowledges that with respect to pluvial flood risk, their site lies in flood zone 2 and that surface water flooding is likely. Their solution, due to a high water table, is to attenuate surface water in a raised bunded “balancing pond” within the southern part of their site, with a controlled discharge to the ditch which borders their eastern boundary.

However the appellant is silent upon whether they have verified that the ditch is a functioning watercourse, with an onward connection beyond their neighbours land. Without such verification it would be **irresponsible and negligent** to give planning permission.

Those of us who have properties adjacent to these ditches can attest that they **are not functioning**. Water is not able to flow freely. The ditches have been neglected by riparian owners. In most part they are a disconnected series of swales, with the main ditch, known as Hatchgate Ditch potentially blocked in a culverted section under Lodge Road and with no visible onward connection thereafter.

This state of affairs was acknowledged in a Section 19 Flood Report (2024) published on behalf of WBC. The report highlighted that certain aspects of the ditch referred to by the applicant are in a “poor condition”.

Field water run off, both from the applicant’s site and the larger field to east, is unable to flow in a northerly direction. It backs up in a southern direction causing localised flooding to the rear of properties in neighbouring Nursery Close and the ditch at the rear of Martineau Lane.



Fluvial flooding, rear of No. 3 Nursery Gardens (March 2023)



Fluvial flooding, rear of No. 3 Nursery Gardens (March 2023)

Furthermore the applicant has **not** provided confirmation that the EA has provided permission to the applicant for the ditch to be used in the manner they propose.

Additionally it is negligent of the applicant and its advisors not to make reference to the Wokingham Section 19 Flood Investigation Report, nor for them to have carried out their own due diligence as to the viability of the ditches.

Accordingly the applicant's surface water drainage solution **is not fit for purpose**. It cannot reasonably ensure that the discharge of excess attenuated surface water into the ditch will not be increasing the flood risk to neighbouring properties.

Sewerage

The applicant has stated that the nearest public sewer is 120 metres to the south from their site and is therefore uneconomical to connect to.

They therefore (in no more than a few words, and bereft of any detail) propose "a package treatment plant" "which will discharge treated effluent to the existing ditch".

The applicant is disingenuous by the brevity of their plans. The design and specification of the "packaged treatment plant" is not provided. Questions regarding the suitability, location and adequacy arise and cannot be answered.

Importantly to what extent does the one line proposal comply with Statutory Guidance, *General binding rules for small sewerage discharges (SSDs), October 2023*?

Of note in those "Binding Rules" is no. 19, ***Discharges must be made to a watercourse that normally has flow THROUGHOUT the year.***

It is IMPORTANT to note that the ditch, into which the applicant proposes to discharge their treated sewage, **DOES NOT** flow throughout the year. For much of the year, especially in the summer and autumn it is dry. At other times it might contain water, but it does not flow, often remaining stagnant.

The applicant will be aware of this as this was disclosed to them by their ecology surveyor who wrote the following:



RE: Land to the East side of Lodge Road

To Whom it may Concern,

AKB Ecology were commissioned by Forays Homes to undertake a GCN survey at Land off Lodge Road, Hurst, RG10 0SG at central grid reference SU 79279 73580 to help inform the proposed development of the site.

A PEA was carried out on the site on the 20th January 2025 by Annika Binet, a GCN licenced ecologist. During this survey a ditch present along the eastern boundary of the site was identified, the ditch was holding water and contained some aquatic vegetation. It was considered to be of below average suitability for GCN given an HSI score of 0.55.

Whilst early in the season the January survey was carried out after the first reports by Amphibian and Reptile Conservation (ARC) and local Amphibian and Reptile Groups of breeding amphibians in the Southeast, an egg search was therefore carried out within areas of the ditch containing suitable vegetation. No eggs were identified during the survey.

Whilst a survey of an adjacent site in June 2024 had noted that the ditch was dry it was unknown as to when the ditch dries annually and as GCN are known to be present within the wider area further survey for GCN within the peak season was recommended to be carried out.

A site visit was carried out by Annika Binet on the 15th April 2025, this is during the peak breeding season and a time of year when eDNA survey to confirm presence or likely absence of GCN can be carried out.

During this survey the ditch was found to have already fully dried out, due to this it is considered that the ditch is unsuitable for use by breeding GCN due to the restricted presence of suitably wet conditions to allow eggs to be laid, hatch and embryos to develop prior to the ditch drying out.

The ditch is considered to not be a suitable as a breeding site, all other confirmed and potential breeding sites are located over 250m from the site. Based on the area of the site to be impacted, and the location of these water bodies to the site a Rapid Risk Assessment calculation carried out for the site identifies that if breeding GCN are present in ponds

The applicant has therefore provided third party evidence that the ditch had **fully dried out** by April 2025.

The ditch is **not** a watercourse that normally flows throughout the year. The ditch is unsuitable for use as a means to discharge treated sewerage. If allowed, the effluent will at best fester in stagnated water, and be of harm to the local ecology and the ponies and donkeys who frequently drink from the ditch.

The applicant's sewage proposals are ill thought and illegal.