

St Nicholas Hurst Parish Council

Appeal: APP/X0360/W/25/3364304

(Planning Application 242067)

Land between Lodge Rd and Tape Lane, Hurst RG10 0EG

“Outline application for the proposed development of up to 99 dwellings, green infrastructure, open space, pedestrian and cycle links, recreational facilities and other associated infrastructure and access points on Lodge Rd and Tape Lane with required improvements. (All matters reserved except for access.)

Additional submission during extended consultation period to 2 September 2025 as granted by the Inspector, following submission of additional evidence by Appellant on 15 August 2025.

Having reviewed the approximately 30 new items of evidence submitted by the Appellant concerning the flood risk at the site and surrounding area, the Parish Council remains firmly of the view, set out in our original submission, that this site is highly unsuitable for development, as it will be prone to serious flooding and will significantly increase the flood risk for the surrounding area.

This view of the flood risk and the Appellant’s failure to address this adequately in its evidence has also been highlighted by the Environment Agency (EA) and Wokingham Borough Council (WBC):

- All the Flood Risk Assessment and Drainage Strategies (FRADS) previously submitted by the Appellant have been judged by the EA as “*not fit for purpose*”. The most recently submitted FRADS, awaiting review by the EA, presents no new evidence and indeed compounds its lack of fitness for purpose by including a series of serious factual errors and major assumptions that are demonstrably flawed. These are described later in this submission.
- The Flood Risk Modelling Report submitted by the Appellant was reviewed by WBC and also found to be “*not fit for purpose*”, again due to flawed assumptions in the model inputs.

Among the factual errors and flawed assumptions which have significant implications on the modelling and flood risk assessment are the following:

1. “*An unnamed watercourse is located to the west of Lodge Rd and appears to flow north*”. Firstly, this is not a floodwater drainage ditch, it is actually the ditch carrying leachate run-off from the landfill to the west of Lodge Rd, to the Lea Farm treatment works. This leachate is discharged under licence by

Summerleaze, the landfill owner. Second, it flows south, not north. Importantly, this ditch is not part of the Hatchgate Ditches system, as the Appellant assumes. It is a separate system that does not serve the land east of Lodge Rd.

2. The Appellant seems not to realise that there is a foul water sewer running across the site, running north from the Thames Water pumping station on Sawpit Road, which has received all the foul water from Sawpit Rd, Barbour Close and Martineau Lane. Residents in some houses on these roads already report their sewage systems backing up during prolonged periods of heavy rain. This major omission calls into question the Appellant's sewage risk analysis.
3. The Appellant has ignored the Black Swan lake at Dinton pastures when assessing the reservoir flooding risk. This lake is upstream from Hurst and regularly floods after heavy rain, closing nearby roads. Again, this omission calls into question the modelling and analysis submitted by the Appellant.
4. The Appellant's drainage strategy relies heavily on their assumptions about the Hatchgate Ditch system. However, put simply:
 - a) these assumptions seriously underestimate the catchment area served by the Hatchgate system (to which 27 new houses have just been or shortly will be added, not taken into account anywhere in the Appellant's evidence), and
 - b) they do not know where the Hatchgate system actually discharges – they just assume that water will somehow ultimately find its way to the River Loddon!

The one certainty is that Hatchgate Ditch runs into a culvert on the site. The major unknown is where water going into that culvert ends up. It does not run into the manhole on Lodge Road, as the Appellant assumes. The answer in fact is nowhere, as the main river into which this ditch used to discharge no longer exists, and this is why the site and surrounding areas have become so prone to flooding every time there is heavy rain.

All of these points are covered in more detail, with explanatory maps and photographs, in the submission on 24 August 2025 of Mr Andrew Dolinski, who is among a group of Hurst residents who have studied the growing flooding problems in the village over a number of years and are familiar with the infrastructure.

Site Visit Note submitted by the Appellant (APP C3)

The Appellant's consultants visited the site on 20 March 2025 and submitted a site visit report to the Appellant on 25 March. (Given these dates, it is not clear to us why this note could not have been submitted with the Appellant's original evidence.)

The note reveals that the visiting consultants were not able to identify the way in which the site drains, or fails to drain, after heavy rain. Among the specific comments in the report were the following:

- Page 2 “*Whilst the culvert was traced to a location in land opposite Lodge Rd, it was not possible to confirm the precise location of the outfall into the Main River watercourse. A search for the outfall into the linear ditch that passes to the North was unsuccessful, despite following all accessible pathways and river access points*”. This is effectively saying that they have no idea where the water drains to!

Additionally, the culvert does not in fact drain to “*land opposite Lodge Road*”, which is part of the landfill leachate drainage system described above.

- Page 3 states that “*Whilst the outfall for this culvert was not located, it is predicted to be at the Main River outfall to the northwest of the development site*”. Predicted but not actually identified, despite the extensive search reported! In fact, they could not find the outfall as it no longer exists. Again, this lack of hard evidence about how and where the water from the site will drain away does not fill one with confidence about the output from the Appellant’s models.
- Page 5 Summary of Findings: “*Land north of the site has identified that the Main River is connected to the River Loddon northwest of the site*”. This is not accurately summarising what that report said earlier on, which is that the outfall was not “*identified*”, just that it was “*predicted*”. There is no evidence presented anywhere by the Appellant that identifies the route in which water from the site makes its way to the Loddon. This lack of consistency undermines the report and resulting FRADS.
- Although it was a dry day and there had not been recent rain, parts of the site around the boundary were found to be waterlogged, indicating that “*groundwater might be relatively high in the area*”. This high water table is a well-known feature of Hurst, where no houses have ever been built with cellars, and many gardens and driveways flood after heavy rain.

Summary

The Appellant’s FRADS and supporting documents submitted on 15 August have failed to provide evidence that the development will be able to mitigate the serious flooding that occurs regularly at the site and surrounding residential areas.

On the contrary, the evidence presented by the Appellant confirms the view of the Parish Council and the majority of Hurst residents that the development will significantly exacerbate the existing flooding problems in the surrounding area, with all of the resulting economic harm this will entail.

Specifically, the Appellant has failed to demonstrate how water from the site will drain to the main river, basing its modelling and resulting proposals on a series of assumptions and predictions that do not stand up to even the most basic scrutiny.

Additionally, the Appellant has singularly failed to take account of relevant features such as a major reservoir upstream from the site, and a foul sewer that runs through the site. These omissions undermine all of the Appellants modelling and analysis.

Section 14, paragraphs 170 to 182 of the National Planning Policy Framework set out clear guidelines regarding Planning and Flood Risk.

The view of the St Nicholas Hurst Parish Council is that the proposed development does not conform to these guidelines, and specifically:

- That this has site been demonstrated to be an area of high risk of flooding and that development is therefore inappropriate and should be avoided.
- That the Appellant has clearly failed to demonstrate that the proposed development can be made safe for its lifetime without increasing flood risk elsewhere.
- That the Appellant has failed to provide a strategic flood risk assessment that a) considers flood risk from all sources and b) considers cumulative impacts in, or affecting, local areas susceptible to flooding. There are glaring omissions.
- That the Appellant's flood risk assessment and modelling have been deemed to be "*not fit for purpose*" by both the Environment Agency and WBC, whose input must be considered under the guidelines. The Appellant's assessments are heavily based on assumptions rather than hard evidence and robust analysis.
- That the development absolutely will not provide wider sustainability benefits to the community that outweigh the flood risk. On the contrary, it will increase flood risk for many Hurst residents and cause material economic harm.

In short, the new evidence submitted by the Appellant confirms that this development does not conform to NPPF Flood Risk criteria, and that it cannot be a sustainable development. We therefore request that the Appeal is denied.