

Objection to App:242067

From: A A Butler, Cranford Drive, Hurst, READING, RG10 0ET

To: Wokingham Borough Council Development Management & compliance.

Dear sirs,

I strongly object to Planning Application 242067, and do hope Wokingham Borough Council refuse this inappropriate development.

This "access only" application with all matters reserved, commits to nothing. With our recent experience how WBC recently handled a similar "access only" "Sawpit" development Application: 240985, where the "outline" homes "as-built" doubled in floor and roof area and became 3 storeys instead of 2, why should we believe that the "outline" 99 houses will not morph back into 200 house "as-built" scheme as proposed in the earlier similar refused Application 220458? To save us all time reviewing irrelevant documents which will never be applicable to the Developer's intended "as-built" development as happened with Sawpit, would it not be best if the Developer were required to submit a Full Planning Application for this revised application?

The scale and impact on the character of Hurst for App:242067 is essentially no different to that of App: 220458, which both WBC and The Planning Inspectorate rightly refused. The refusal decision was covered by Inspector David Wildsmith comprehensively in his "Summary, planning balance and overall conclusion, Appeal Decision paragraphs 137, 138, 139 and 140, and the reasons for coming to the refusal conclusion Remain the same.

However, I strongly disagree with the Inspector's statements and conclusions regarding Flood risk and drainage, covered by Appeal Decision paragraphs 114, 115, 116 and 117, and believe a different decision would have been made had the Inspector been properly and better informed by LLFA Wokingham Borough Council.

In Appeal Decision paragraph 117, the Pell Frischmann FRA is referenced as if totally accurate, but like all developer's recent FRAs this report was based, as is the current App:242067 FRA, on obsolete and incorrect on-line EA documents which bear little relation to reality and are likely, if referred matters are handled like Sawpit, not to relate even to the number or sizes of houses built, and involve a proposed surface water drainage scheme which is not viable.

It was a shock to discover WBC did not raise frequent flooding in Hurst as an issue during last year's Lodge Road Appeal, and did nothing to challenge the view outlined in Appeal Decision statement in paragraph 116 which states "watercourses on the southern and western boundaries of the appeal site currently serve as receptors for surface water falling on the undeveloped site". The applicable EA "Main river" watercourses don't exist. Schemes based on this assumption, including the currently proposed scheme, are not viable; they won't work. A copy of a document sent to the Environment Agency pointing this out and to urgently correct the on-line EA "Flood map for planning" is attached, which had the Inspector seen, it might have well tilted his flood risk decision the other way, see "Hatchgate Ditch".

The new draft section 19 flood report submitted with LLFA Wokingham Borough Council "Willowmead" Planning Application: 230074 is an encouraging start because it begins to address the specific flooding issues in Hurst. However, it is in the interests of Hurst residents at medium and high risk of surface water flooding for the final report to be as informed, accurate and professional as possible; unlike the usual documents we review produced by a developer's contractor. The draft report has been briefly reviewed and some suggested areas where it can be improved are attached. I am sure if WBC or the EA needs any more information on major and minor changes to Hurst's topography, or more details regarding Hurst's actual recent flooding history, many Hurst residents including myself would be happy to provide what information we can.

Although submitted with App: 230074 documentation, this report will of course apply for all future proposed development in Hurst and is very important for Hurst Village residents. It needs to be right and stand up to a developer's expensive King's Counsel scrutiny at Appeal, so I hope my comments are taken positively rather than negatively, see: Regarding Willowmead Appeal.

Request for the deletion of non-existent and non-viable “Main rivers” from GOV.UK. EA’s current, incorrect, and misleading “Flood map for planning” for Hurst, READING. Specifically, delete the main “Hatchgate Ditches” wrongly shown running approximately north either side of Lodge Road (B3030) to Whistley Green, and the connecting ditch west, wrongly shown connecting to the River Loddon; these ditches, designated “Main river”, don’t exist. A suggested site visit:

To be viable, essential surface water drainage proposals for recent major Planning Applications in Hurst, require the FRA predicted additional displaced surface water to discharge to local ditches (currently shown and classified on GOV.UK. EA **Flood map for planning** as “**Main river**”).

The Hatchgate Ditch, and its subsidiary ditches are the “Main rivers” involved. However, this ditch system is in a poor state, and no longer exists at all as a north and west waterway draining towards, and directly to, the River Loddon. The north/south Hatchgate Ditch either side of Lodge Road has, in many places, been completely blocked and built-on, and now provides only very local pond-type flood compensation for Lodge Road, but absolutely no flow north or west for drainage. Any developer’s scheme, based on using this now non-existent EA “Main river” to dispose of extra displaced surface water due to new raised and paved development, is not a viable or socially acceptable option. New raised development on such low-lying areas (typically 37.0m to 39.0m AOD(sea-level)) will displace storm water causing increased surface water flooding and harm to both near and far neighbours, situated almost anywhere within the Hurst Terrace water Trapping Triangle (the contained naturally flat area bounded to the northeast by Haines Hill, south by Ashridge M4/A329(M), and west by Dinton and Hurst waste landfill hills).

The stated intention of both the Lodge Road development Planning Application 242067, Willowmead development Appeal Ref: APP/X0360/W/24/3342812 App: 230074, and the now retrospective recently built Sawpit development App: 240985, is for the primary disposal of site surface water to the main Hatchgate Ditch. For the primary disposal of surface water from two large greenfield sites, and one previously greenfield site (now built-on), this strategy will not work which makes this an urgent and serious matter.



The Lodge Road and Willowmead sites pictured, historically are usually waterlogged during winter and spring. It is hoped that WBC Planning personnel fully understand this current situation and the true condition of the Hatchgate Ditch and its subsidiary ditches intended to drain Sawpit Road, Barber Close, Martineau Lane, and lower School Road (by The Village Halls). If not, the following site inspection route is suggested following Howard’s Way north, on the west side of Lodge Road:

- (1) Join Howard's Way footpath opposite the Sawpit Road junction. Crossing the wooden bridge over the north/south main Hatchgate Ditch ("Main river" on GOV.UK EA "Flood map for planning"), turning right (north) onto the footpath, which runs alongside the newer, deeper, parallel Summerlease landfill surface water run-off, and leachate, segregation ditch. At this point it can be seen that the Hatchgate Ditch is a series of old swales or ponds (as opposed to a well-defined ditch or EA "Main river"). At EA "Medium risk" of surface water flooding, this whole area just west of Lodge Road connects directly to medium flood risk areas opposite to the east, including Sawpit Road, the proposed development site, Barber Close, and Martineau Lane.
- (2) After heading north, with the Summerlease segregation ditch to the left, and the deteriorated Hatchgate Ditch to the right, follow the path right to rejoin Lodge Road for a short distance, along the verge around the recently redeveloped property "The Old Lodge". Heading left through the gate, using the Summerlease site access track to rejoin Howard's Way footpath north; note the roadside Hatchgate Ditch does not exist at this point. Running alongside the leachate segregation ditch on the left, with an open field with gas/contamination sampling points to the right, the path turns sharp right approaching the wooded area and then sharp left through the wood, now again closely following the original roadside Hatchgate Ditch route. At this point the ditch (EA "Main river") becomes less distinct, with various filled-in crossing points to Lodge Road.
- (3) After proceeding 50m or so north, reaching the prominent vented iron cover marked BHTCL, carefully make a diversion right, across a filled-in section of the roadside Hatchgate Ditch, towards the entrance/access on the opposite side of Lodge Road, at the southern boundary of



"The Paddocks". As the road is crossed, there is a manhole cover (2801), with perhaps the sound of running (pumped) water to be heard. This is the point where the existing foul sewer, running within the proposed development site from Sawpit pumping station, joins the sewer running north to Whistley Green connecting directly with the A321/ Broadwater Lane and Tape Lane sewers. It is near Tape Lane's junction with A321 Broadwater Lane, that "water" has been photographed issuing from the Hogmoor Lane sewer cover (during partial surface water flooding experienced 1 April 2023). It is also at this point on Lodge Road (manhole 2801), the Summerlease pumped "bio-solids" pipe, containing processed leachate (with cyanide, lead and copper compounds), joins the normal Hurst sewage system. Normally this would be expected to flow north to Thames Water's Wargrave facility, but with the possibility of cross contamination, which depending on surface flood levels, will flow to the lowest point. This flow may not be north but elsewhere and anywhere in Hurst connected through the sewer system, as witnessed at Hogmoor 1 April 2023.

- (4) From the confluence of the Hurst domestic foul, and Summerleaze bio-solids sewers, walk (very carefully) south on Lodge Road to look through the entrance gates to the development site on the east side. It can clearly be seen that this is now continuous flat grazing with no open ditch to act as either flood compensation or “Main river”. This leg of open Hatchgate Ditch running through



the proposed development site, and into which the Developer proposes to discharge surface water displaced from building 100 to 200 houses, is no longer there. The ditch destruction and site levelling is documented on Lodge Road Google Streetview photos 2008, 2009, 2010. Admire the horses grazing and, minding speeding traffic, carefully head back to rejoin Howard’s way, walking north.

- (5) Along this section of Howard’s Way the grassy Lea Farm and Whistley Hurst Landfill waste hills to the west, now preventing any surface water drainage to the River Loddon beyond, perhaps add to the rural feel of the area, even with the presence of the slightly strange gas collection and sampling points. A generation or more ago, this area was flat and marshy flood plain, and the surface water run-off from the east slopes of these impermeable capped waste hills is unfortunately now towards Hurst, rather than west to the Loddon. Together with the naturally higher land of Haines Hill to the northeast and Ashridge to the south, it is these new man-made barriers to the west that have created the present Hurst Terrace surface water Trapment Triangle, where all surface water can only naturally flow towards the Broadwater pinch point at Twyford Brook to the north.
- (6) On reaching the end/ beginning of the Howard’s Way footpath at Whistley Green, carefully walk through the scrub west to the Summerleaze segregation ditch, and looking west the landfill hill horizon can be seen sloping down to the north near Whistley Court Farm. What cannot be seen, and what has been covered and destroyed by the landfill, is the EA “Main river” ditch shown on EA “Flood map for planning” connecting the Lodge Road roadside Hatchgate Ditch directly west to the River Loddon. Now replaced by the new Summerleaze leachate segregation ditch, which extends around the perimeter of Whistley Court Farm and a little way west. The flow in this segregation ditch is not north, but south to the Lea Farm contaminant attenuation/ processing pond. There is no connection to the River Loddon or any other main river.

- (7) Walking north from the entrance of Howard's Way on the west side of Lodge Road, stop opposite Rhodesia Villas and look west. If it existed, it is at this point one should see the EA "Main river" (shown as existing on EA "Flood map for planning") running west from the roadside Hatchgate Ditch straight to the River Loddon. At this location, neither "Main river" now exists, and possible reinstatement would be difficult and unlikely due to the height of the landfill hill, and the need to cross the new contaminated landfill run-off/ leachate segregation ditch which crosses the path of the filled-in old ditch west to the River Loddon, and starting west of Whistley Court Farm, the new ditch flow is in the opposite direction.



- (8) Walking further north, Whistley Farm redevelopment opposite Corner House, with the raised roadside verge, pavement alongside and wide access road joining Lodge Road, has completely obliterated the Hatchgate Ditch and any evidence it ever existed. New buildings, such as the



large garage/barn at the centre of the photo, built on the line of the obliterated ditch, makes reinstatement of this now non-existent ditch difficult. The work does not simply involve ditch maintenance or "clean-up" by others as wrongly suggested by the Developer, but also major civil works demolishing new properties and installing new large culverts.

- (9) Walking a little further north, and if the timing is right, it might be appropriate to pop in The Elephant & Castle and reflect on the demise of the ditch. Unfortunately, this Whistley Green location is now surrounded and increasingly affected by local built-higher development. The recent nearby raised Nursery Garden development, and the associated removal of adjacent roadside ditch flood compensation, is likely to have made the surface water flooding problems for existing lower-built neighbours much worse. With the north section of Hatchgate Ditch now completely gone, The Elephant & Castle was already at EA high risk of surface water flooding, and unfortunately as widely reported in the media, in February 2014 sewage covered the car park.

App: 242067 specific comments on how proposed surface water discharge is handled:

More inconsiderate, higher-built, dense, new development in Hurst involving ill-conceived topographical changes, will cause harm to neighbours by making surface water flooding problems more frequent and worse. An “access only” application specifies nothing, and experience has shown with the recent “Sawpit” development, that “outline” roof areas alone doubled in size from that used for the Developer’s Flood Risk Assessment. And despite the Developer’s “outline” assurance that infiltration on site for surface water would be feasible, it now turns out rainwater is to be discharged offsite towards neighbours. It is essential we scrutinize a Developer’s true intentions on how to deal with the newly displaced greenfield surface water due to a development’s raised impermeable floor levels and associated paved areas. The “suggested site visit” described was specifically prepared in response to a developer’s “access only” approval request for: Wokingham Borough Council Planning Application Number: 242067 Site Address: Land Between Lodge Road and Tape Lane Hurst. A similar Application was refused at Appeal 9th March 2023, but unbelievably flooding issues were not raised by the LLFA Wokingham Borough Council at the Appeal, and under Section 6 representation, St Nicholas Hurst Parish Council were prevented from raising surface water flooding issues. Consequently, it is not surprising that Hurst residents currently with EA medium or high risk of surface water flooding would like assurance that the issue is being properly addressed and handled by LLFA. Based on past evidence it is reasonable for Hurst residents to question whether this is the case, or the issue is even properly understood by LLFA - hence the suggested site visit. Some brief comments relating to discharge of surface water for the Developer’s “access only” application App: 242067 follow:

Firstly, on EA “Flood map for planning” the on-site ditch is designated as “Main river”, and currently shown as being complete and functional which it is not. See GOV.UK. website. Or see Developer’s “Planning Statements and Reports”, Flood Risk Assessment and Drainage Strategy (FRA&DS), 4.2 FLOOD RISK STRATEGY, Page 5, Figure 2: Extract of EA Flood Map for Planning.

Secondly, the correct functioning of this ditch is essential to the Developer’s proposed scheme for surface water drainage from the site. The Developer’s FRA&DS, Section 5.6, Proposed Surface Water Drainage Strategy concerning discharge of all surface water states, “*ultimately discharging to the onsite water course located along the western site boundary*”. Also Drawing Number 409.010068.00001-SLR-HD6-500-1 Rev P04, shows; INSET A – SECTION A-A PROPOSED OUTFALL TO EXISTING DITCH. The ditch shown in impressive technical detail (on the drawing), is 3.12m wide 1.5m deep, with a top edge level of 37.15m AOD (sea level), which is a very low level for land to be raised, and built on displacing storm surface water within the Hurst Terrace surface water trapment triangle. At present, with the ditch completely closed-off at the north end, on-site surface water collecting in the remains of the on-site ditch to the south, will have to seep further south and elsewhere through Hurst; Tape Lane, Lodge road, Martineau Lane etc, down to Hatchgate, across to Broadcommon, then north below Haines Hill to join the Twyford Brook and River Loddon.

Thirdly, the Developer’s Contamination Report Part 1, similarly requires Hurst’s system of ditches, (which to the west largely no longer exist either at all, or as continuous waterways), to function as they once did. Looking at the Executive Summary, the Developer’s report states under “Hydrology”, “*On site, along western site boundary. Ditch carries surface water from south to north, toward the inland river north-west of the site. Rivers are located 180m west and 244m north of the site*”. Under “Topography”, “*The ditch was filled with water at the time of inspection*” (which it would be because it doesn’t flow anywhere and can only soak away). Clearly any site inspection by the Developer’s contractor must have been rather cursory, otherwise they would have seen and known the Ditch is now not viable. Also looking at Google maps, the nearest actual river is the River Loddon over 400m west-north-west, to the north-west corner of the site, which does make one wonder about the veracity of the Developer’s observations and submissions.

**Why removing non-existent Hatchgate Ditch from EA “Flood map for planning” is important.
Summary and conclusions:**

Worryingly, use of the non-existent main Hatchgate Ditch is equally applicable to “access only” approval requests for: WBC Planning Application: 230074 Appeal Ref: APP/X0360/W/24/3342812 Site Address: Land Adjacent to School Road and Orchard Road, Hurst. And sadly, retrospectively applicable to “access only” approved for: WBC Planning Application: 240985 Site Address: Land at Junction of Sawpit Road and School Road, Hurst.

All three schemes propose or have proposed to drain additional surface water run-off into a nearby EA “Main river”, and all three planning applications are or were worryingly “access only” with nothing at all actually defined. As mentioned, approved “access only” with all matters reserved, the Sawpit development “as-built” doubled in size from the outline documents submitted, involved retrospective approval by WBC of what the builder had already built, and the Developer’s suggested “outline” infiltration measures for surface water drainage proved impractical on the soggy impermeable site. Sawpit “new-build” site surface water run-off is currently unofficially piped just to the nearest ditch, which should by WBC “reserved matters” design approval, connect by culvert to the Hatchgate Ditch tributary on the opposite side of the road. Clearly the main Hatchgate Ditch is no longer viable for sensible surface water drainage off site and what’s left of local Sawpit Road Hatchgate Ditch tributary, even with clearing and maintenance, will only provide a helpful increase in local flood compensation for Sawpit Road but no onward drainage to a “Main river”.

Surface water flooding for neighbours, including The Hurst Village Halls, will have been made worse by the new Sawpit development, which with “as-built” retrospectively approved buildings covering twice the area shown for outline approval, makes the developer’s flawed “outline” Flood Risk Assessment even more irrelevant. It is important that any similar deceitful and antisocial planning applications like Sawpit in the pipeline, with an underlying intent to just discharge excess surface water next door, increasing both the surface water flood risk and actual flooding harm to neighbours, must just stop. Official documentation that allows developers to do this using inaccurate base data for theoretical “desk studies”, which bear little relation to reality, must be brought up to date to prevent new development in the wrong place. Continuing with higher-built development in a low flat area as we are, has future potential financial implications for both the Environment Agency and LLFA Wokingham Borough Council to ameliorate the resulting current and worsening permanent surface water flooding in Hurst, such as at the bottom of Church Hill near Lodge Road/Davis Street.

Please will the Environmental Agency help and act urgently to remove non-existent “Main rivers” in Hurst still shown the **GOV.UK. EA Flood map for planning**, to stop developers using inaccurate official data to force approval via The Planning Inspectorate of proposed unviable surface water drainage schemes which will cause increased harm and misery to existing Hurst residents.

If required, I would be happy to attend and be involved with a site inspection and visit by EA Officer and WBC Planning Officer.

A A Butler

Table 2-1: Key Stakeholders (Page 12)

Residents are considered “Not Applicable” regarding “stakeholding”. Why?

It is Hurst Residents who are at risk of surface water flooding and have decades of experience and detailed knowledge of where and when this flooding happens in Hurst, and of major changes to topography, new neighbouring higher building, and suburbanization of road frontages, making things steadily worse.

Many Residents, some at medium and high flood risk; others not, are also involved with exercising (or ignoring) their riparian rights, especially where this involves physical changes to property road frontages, and lack of maintenance of adjoining roadside ditches, swales and entrance culverts. See 5.1.5 Riparian Landowners, many of whom are Local Residents (5.1.5).

It is suggested Hurst Residents be more involved and engaged when it comes to consulting on surface water flooding matters within Hurst Village.

3 Catchment characteristics, 3.1 Topography (Page 13)

For Hurst, with massive and relatively recent man-made topography changes to the west, it is suggested the report properly describes these changes, and with more detail. The Hurst Village area which was, and is, largely naturally flat, has now been turned into a largely man-made surface water “Trapment Triangle”, where all natural drainage of surface water collected and trapped on the Hurst Village Terrace, needs eventually, to flow north through a single pinch point near Twyford at the top of this flat Trapment Triangle. This change, and the current situation, should be properly described, viz:

To the northwest of Hurst Village, immediately west of Lodge Road, the original flat and marshy River Loddon flood plain has been replaced by capped, impermeable, artificial, landfill waste hills, with surface water on the eastern slopes now draining towards Hurst Village. Broken only by the “Sandford Lane Gap”, the Dinton Pastures gravel waste Golf Course hill, just west of Davis Street, extends this western, relatively new man-made barrier south to A329(M). The substantial landscaped landfill waste hills to the north of Sandford, result from Summerleaze Hurst Landfill operations completed in 2005 (landscaping) and 2006 (last waste accepted). Since then, surface water to the west of Hurst Terrace; Lodge Road, and Davis Street, can no longer naturally drain west, now having to drain south around Church Hill, east past Hatchgate, and into the Broadcommon system to then drain north. The Sandford gap connects the Hurst Terrace directly to an area which is Flood Zone 3b; the regularly flooded 3b area being fed by higher River Loddon levels via a weir in the east (Hurst bank) of The River Loddon, near and north of Heron’s water. The connecting Sandford Lane Junction with B3030, and the surrounding flat Hatchgate land, lies on a similar level 38.0m AOD to the Church Hill junction with B3030.

To the south, surface water on the Hurst terrace is contained by the higher land of Ashridge, and additionally by artificial man-made barriers formed by the M4 and A329(M). To the southeast, a stream running under the M4 and through Billingbear Park, carries surface water catchment from near Popeswood/Binfield, running under The Straight Mile, alongside Broadcommon Lane, and into the Broadcommon ditch system running northwest below the higher land of Haines Hill.

From the higher land of Haines Hill to the northwest of the Hurst Terrace Trapment Triangle, all surface water naturally drains towards the sparsely inhabited lower-lying Broadcommon and Broadwater areas (around 37.0m AOD) east and north of Hurst Village, eventually flowing north into the Twyford Brook. Apart from the Hurst Church hill itself (a few metres high), most of the natural Hurst Terrace surface water Trapment Triangle is very flat and low-lying relative to surrounding terrain at between 39.0m and 37.0m AOD.

It would be very helpful and instructive to include an up-to-date detailed coloured and contoured Terrain/ Lidar map, specifically showing the current topography of the Hurst Terrace catchment area (Haines Hill to the northeast, to the south M4/A3209(M) and Ashridge, and to the west, the new artificial Lea Farm and Whistley waste hills and River Loddon beyond.

3.3 Drainage system and river network (Page 14)

Correct the error regarding flow direction and location of The River Loddon, ie;

A tributary of the river Thames, known as the River Loddon, “flows north, along the western” fringes of Wokingham; replacing “flows south, along the eastern”.

Figure 3-5: Condition of EA assets in Hurst: (Page 17)

To be useful and relevant, Figure 3-5 needs to be updated and more accurate regarding what actually exists today. But at least it does convey an overall picture of an ancient, once efficient, natural drainage system, now changed and compromised substantially by major earth/waste works, and significantly by residents’ suburbanization of road frontages, heavy traffic damage pushing verges into ditches, and from general neglect, being allowed to deteriorate into a rather sorry state.

But some of what is shown is wrong and misleading. “Main rivers” as shown on this map and as shown on “GOV.UK Flood map for planning”, are not shown either accurately, or up-to-date. Some of what is shown is seriously out-of-date, closely matching a 1967 OS Map, and not reflecting recent changes to Hurst’s topography and drainage. A current map should clearly show the capped waste landfill hills created on previously flat flood plain west of Hurst, and not show the now missing surface drainage ditches, swales and ponds; changes which have significantly changed the topography and hydrology of Hurst, especially to the west. For instance:

As clearly seen on the 1967 OS Map, where the Hatchgate ditch on the east side of Lodge Road used to join the roadside ditch on the west side through two culverts, two adjacent red spots on “B3030” rate the locations as Condition 5, very poor. The ditch is now completely non-existent near intended access for a proposed Lodge Road 100/200 house development. The destruction of this ditch is well documented on Google Streetview on pictures taken in 2008, 2009, and 2010; see comments by A Butler submitted 27/08/2024 for WBC Planning App: 242067.

South of the two red dots are two yellow dots indicating the ditch in fair condition, but being blocked at the north, and now with the ditch just a local flood compensation swale (not a water way), the Lodge Road/ Tape Lane (often waterlogged) field surface water, now seeps south towards Martineau Lane, Sawpit Road, School Road/ Church Hill, and Orchard Road, before making its way south around Church Hill, past Hatchgate to Broadcommon. Or during heavy rain, north along flooded Tape Lane through the sewers, to add to A321 Broadwater Lane and Hogmoor Lane flooding.

Looking at the nearby yellow dot on the opposite side of the road, the Lodge Road west roadside ditch condition is classified as fair, but on inspection, while a lot of the deteriorated ditch which widens into larger flood compensation swales remains, it is no longer functional or continuous as a flowing ditch or “Main river” as shown on Figure 3-5. A better indication of where ditches still exist is the map for “Extent of flooding from surface water” (which is not included).

It is suggested the **“Extent of flooding from surface water”** map be included in the Report. From this map, a significant ditch is clearly visible to the west of Lodge Road which does not match Figure 3-5, or the “GOV.UK. Flood map for planning”. This is the new Summerlease contaminated “landfill” (impermeable capped waste pile-up) hill run-off and leachate segregation ditch, which at points, runs within 10m of the old Lodge Road roadside ditch, both of which are at medium risk of flooding, and connecting with the whole of Hurst Terrace, spreading possible leachate contamination; this is where a black “unchecked” dot is shown Figure 3-5, but checking would have been instructive.

The area on the Wokingham Road A321, where significant flooding has been recently pictured in Wokingham Today, and where the only remaining roadside ditch in front of Walden Acres has largely been filled with debris, has clearly not been inspected or assessed

Etc. etc. etc. this condition assessment is a bit random and patchy.

The very useful, but conflicting GOV.UK. “Extent of flooding from surface water” map, has not been, but should be included in this report, and used to identify and concentrate on inspection and assessment of problem areas.

Table 4-1 Flood history (Page 21)

The Flood history is misleadingly incomplete and needs to include more of the experienced flood events to properly convey the extent and frequency of localized surface water flooding in Hurst. For example, the following flood events need to be added:

“Date: Feb 2014. Source of flooding: Mainly heavy rain. Description of impacts: Many roads flooded and blocked; School Road, A321, Land’s End ford over 5 feet deep, Hinton Road blocked, at one stage causing Hurst to be completely cut-off, Portaloos deployed near Sawpit due to sewer system overload/failure.”

Perhaps not hard to research on-line by WBC and JBA, this event was widely reported in the media, including Meridian TV. Also, “The (Maidenhead) Advertiser”, February 20, 2014 “Now the mopping up starts” included pictures of both the Land’s End ford (level going down between Hurst and Charvil to only 5 feet deep) Ref:119067-7, and The Fire Service pumping water from School Road Hurst in front of the Village Hall (next to Willowmead); CLEAR UP Ref: 119066-14. How on

earth has this event been missed off Hurst's flooding history when toilets could not be flushed, "The Elephant & Castle" closed due to sewage, and access for emergency vehicles was, for a while not possible? This incident has implications for 5.5.1 Local Resilience Forum (LRF).

"Date: Jan 2016. Source of flooding: high level River Loddon. Sandford Lane and surrounding area flooded and impassable. WBC commissioned WSP SANDFORD LANE FLOOD INVESTIGATION REPORT JANUARY 2016 FLOOD EVENT."

An event which should appear on the report is Sandford Lane flooding in 2016, which resulted in WBC commissioning a specific flood report. In terms of flood history, this regular flooding happens every year, and usually more than once a year. For instance, the last time I was unable to use Sandford Lane due to flooding was earlier this year, Saturday 30th March 2024. The significance of 2016 is that a flooding report was commissioned by WBC, and with a flooding report commissioned, it should surely be included in the flooding history Table 4-1.

The report is particularly relevant because it highlights the (then) worrying apparent ignorance of WBC, and their contractor WSP Parsons Brinkerhoff, about the true cause of flooding, and the nature of the area being investigated. This area of Hurst including Sandford Lane with Lavall's Lake to the North, and Sandford Lake to the south, must logically be deliberately flooded Flood Zone 3b; a 3b flood zone which directly links The River Loddon with the flat Hurst Terrace and Village "Trapment Triangle" to the east via the Sandford gap, over low-lying land between the recent man-made waste barriers, which now stop Hurst's surface water draining west. When the level of the River Loddon rises a couple of feet, the weir located in the Loddon's east riverbank, spills and dumps water into the Sandford Lane area towards Hurst, protecting Woodley.

The WSP report does not mention either the east riverbank weir, or that this area of Hurst is Flood Zone 3b, or that Black Swan Lake in Dinton is normally held 1m above the River Loddon's level, and does not provide initial capacity of the previous natural flood plain for flood compensation for a rising River Loddon. We need a lot more accuracy in these flood reports for the powers-that-be to have a better understanding of what is going on, and to make the appropriate decisions on where to build.

Importantly, Table 4-1 does not appear to include nuisance, semi-permanent, flooding and pooling, which this year has affected, and been prominent both in Orchard Road next to the proposed Willowmead site, and very prominent in Church Hill where it joins Lodge Road/ Davis Street, to hinder access to Willowmead from the west. Where is the history of these unacceptable "minor" permanent floods to be recorded?

Addressing flooding in Hurst (Page 58)

For "DOWNSTREAM: All the water to the east of Hurst flows into the Twyford Brook", it would be more accurate to state, *"All water to the west, south and east of Hurst now flows into..."*.

For "UPSTREAM" the flow of surface water from north of Bracknell into the Twyford Brook, past Ruscombe Lake and through Stanlake, is correctly identified as a water source which causes back-up of surface water in Hurst. What is not mentioned is the flow into Hurst of what could be called the Broadcommon Brook, directly adding to Hurst's surface water "from the M4", flowing north through Broadcommon below Haines Hill. It is suggested that this significant watercourse, in which fish are sometimes to be seen, be added to upstream water sources, viz:

“Southeast, the Broadcommon Brook runs from the Popeswood area near Binfield, under the M4 through Billingbear, under the Straight Mile, to join and run immediately alongside Broadcommon Lane, turning under a road bridge to join the Broadcommon drainage system.”

Again UPSTREAM, a significant water source is the weir in the east bank of the Loddon which spills only modestly higher River Loddon levels towards Hurst, like the Twyford Brook by causing drainage back-up, and preventing any flow west of additional storm surface water in Hurst. This Zone 3b flooding source seriously affects the Parish of Hurst but is perhaps wrongly identified as a Woodley problem because it stops many Woodley residents using the well-known commuting “rat-run”, Sandford Lane. The Emm brook also flows into this area – normally to the Loddon, but when River Loddon flooding levels rise and EmmBrook is flooded, spilling towards Hurst, and back-up occurs, who knows where?

“To the west, a weir in the Hurst east bank of The River Loddon, spills high river level towards Hurst regularly flooding a Flood Zone 3b area including Sandford Lane, Sandford Lake, Lavell’s Lake, to and beyond the Emm Brook preventing and restricting any flow and drainage of Hurst’s surface water directly west to the Loddon.”

Surface water run-off from the eastern slopes of the impermeable waste landfill hills should also be considered. Normally collected by the Summerleaze leachate segregated ditch system to rest/process, and for Thames water to deal with, when storm conditions and flooding happens, where does this landfill hill surface water, which never used to drain eastwards towards Hurst, end up?

The very fact that a document has been produced which even begins to look at the surface water flooding problems in Hurst is a move forward. For “THE PLAN”, would it not be a good idea to first add to, and correct, this draft S19 Flooding Report, before rushing to decide “what has to be done” and formulating detailed plans, what, who, when, where etc? As a start, planning to pave over and raise levels building on the Willowmead site (App. 230074) should sensibly be left on hold until the worsening surface water flooding problems in Hurst are better understood, viz:

When flooding is so extensive that it completely cuts off Hurst as in 2014, has the risk of “landfill” leachate escaping as surface water makes its way east across Hurst to drain north through the Broadcommon system of ditches, been properly assessed? Mr Lowe of Summerleaze, in a “Hurst Villager” article, apparently assured us that, despite waste still being received in 2006, the piled-up “landfill” will degrade over the next 30 years and no longer produce leachate. But 8 years ago in 2016, the levels of what are benignly described as “soluble minerals” in leachate (actually, cyanide, lead and copper) were rising and failed to meet the then specified compliance levels, resulting in EA Permitting Decision EPR/BV72221V/V004 for Hurst Landfill operated by Summerleaze Limited. Hence, perhaps a more pressing question might be “have leachate contaminants reduced back to compliance levels permitted before 2016, prior to the EA permitting decision”? Where is the hydraulic study allowing the Loddon flood plain to the west of Hurst to be destroyed and its effect on surface water flooding in Hurst? Where is the possible landfill contamination due to flooding/ surface water flooding risk assessment?

ORDNANCE SURVEY MAP AROUND HURST (shows zero contours = very flat) (Page 61)

Do not include a map unless it is up to date. At the bottom of this Report’s OS map, the 40m contour for Church Hill is visible, but the Map included does not show contours for the recently

constructed landfill hills on Whistley Park. However, the latest OS Map does show the Whistley waste hill 40m contours, both close to Lodge Road and extending north to Whistley Court Farm.

It is wrong to include a map showing unobstructed flat flood plain which misleadingly implies surface water in the west of Hurst can drain directly to the Loddon; it can't. Also, although the now closed-off ditch to the east of Lodge Road is shown, the Summerleaze Leachate segregation ditch just to the west of Lodge Road, which is very clear on the "Extent of flooding from surface water" map, is again not shown.

On the plus side, the OS Map does show the deteriorating complex and tortuous Broadcommon and Broadwater ditch systems below Haines Hill, where all the natural drainage of surface water within the "Trapment Triangle", must drain north into the Twyford Brook pinch point.

Do not include this map in the final report; include the up-to-date issue with contours or don't include it at all.

The Elephant (or mammoth) in the room?

No one seems to want to mention, know of, show, or talk about, the waste previously tipped and piled in the west of Hurst, its obvious effects on topography and hydrology, trapping surface water changing flooding patterns, whether it presents any risk to human health, and whether it is sensible to now build houses near it. The recent application for 99 (ne 200?) houses App. 242067 for Lodge Road, contains precious little information regarding these waste heaps immediately opposite within metres, their construction, condition, effect on flooding, and still venting gas and draining leachate (liquid containing cyanide, and lead, copper compounds), which with just medium risk flooding, could spread across much of Hurst.

As LLFA (Local Leading Flood Authority), do the EA and WBC Development Management & Compliance support Mr Mike Lowe's Summerleaze view (ie: that piling up of refuse and waste in sealed impermeable heaps, on previously flat flood plain, has no effect on surface water flooding in Hurst), and is there any relevant up-to-date credible hydraulic study by EA, WBC, Summerleaze, or anyone else which supports this case, and which is available to the public? Does one need to make a freedom of information request to find out what has or has not been considered? Does a new competent and truly independent hydraulic study now need to be carried out in view of both the massive, and smaller changes to Hurst's topography, before any major building projects are approved by WBC and The Planning Inspectorate, and before surface water discharge arrangements are approved by EA?

Near Sawpit Road, the Summerleaze landfill leachate segregation ditch at some points lies within 10m of the remains of the Lodge Road roadside ditch. With both ditches at medium risk of surface water flooding, easily connecting, then draining across the whole of Hurst Terrace. The Summerleaze pumped "bio solids" leachate pumped discharge pipe connects directly with Hurst's foul sewer system near the proposed Lodge Road development site entrance, linking most of Hurst to potential contamination during flooding. Has an appropriate contamination risk assessment ever been carried out?

A A Butler

