

WBC Planning Application 261624 – OBJECTION

Land West of Hogmoor Lane, Hurst: Permission in Principle application for the proposed erection of a maximum of 2 no. dwellings (or a minimum of 1 no. dwellings), including formation of an access from Hogmoor Lane.

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Date: 29/07/2026

Based on the many reasons for previous WBC refusals to approve building on this 5HU030 site, I object to the proposal and do hope WBC Planning maintain their position and refuse this inappropriate “Trojan Horse” PiP Planning Application: 261624

(A) For this alternative PiP, the Applicant has submitted a new document “**Flood risk Assessment, Hogmoor Lane, Hurst , Berkshire, Issue date 20/07/2026**” generated by Calibro Consultants Ltd, Bristol. The screenshot below is of the FRA Contractor’s disclaimer at the start of this document:

This report has been prepared by Calibro Consultants Ltd for the sole benefit and use of the Client. Calibro Consultants Ltd offer no liability for the information contained within the report to any third party.

Does the acceptance of no liability for the information contained within the report to any third party mean what is stated is perhaps already known to be misleading or not to be true, and consequently of no value to either WBC Planning or at-risk Interested Parties? What is the point of submitting the document if the Applicant is not prepared to stand by what is stated?

It is hoped WBC Planning and as WBC as LLFA reject this misleading document which offers “no liability” and fails to address the certain increased neighbouring flood risk; specific reasons for lack of credibility include the following (B) to (G):

(B) The screenshot below from the Applicant’s FRA “**2.4 Recorded Flooding**” displays an attempt to create a misleading impression of “**no historic flood events in the vicinity of the site**”. The Applicant’s FRA fails to mention easily found and relevant official WBC flood reports and previously submitted Interested Party irrefutable flooding evidence submitted both with App: 240853 and App:260353 – both applications directly relevant to WBC Site Ref: 5HU030. By association with what should be respected organisations, statements are made which misleadingly imply there is no local flooding history.

2.4 Recorded Flooding

Do

2.4.1 The Environment Agency’s (EA) ‘Recorded Flood Outlines’ dataset records no historic flood events in the vicinity of the site.

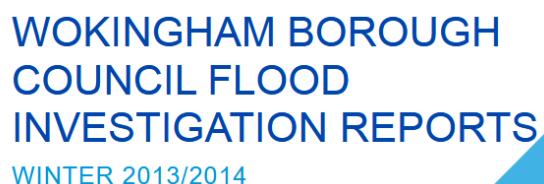
2.4.2 A search of British Hydrological Society’s Chronology of British Hydrological Events yielded no relevant flood records.

WBC as LLFA still agree with these “no liability accepted” statements which wrongly imply no flooding history or risk, made by FRA contractor Calibro on the Applicant’s behalf?

It would appear there has been a lack of due diligence on the part of the Applicant’s FRA Contractor to either properly research the flooding history of both the site and surrounding area or any attempt to either acknowledge, or present the local flooding history as it is.

(B1) Would it not be reasonable to expect a “Bsc Msc M.CIWEM CWEM Associate Flood Risk Consultant” to be capable of, and to have initially carried out a simple Google search using “WBC Flood Reports for Hurst”, or “WBC S-19 Flood Report”, WBC Site Ref: 5HU030, or something similar?

Had this simple task been attempted the following official, formal WBC-commissioned reports are easy to find:



While these reports represent only snapshots of Hurst’s recent flooding history, and with further informed review their accuracy and analysis could undoubtedly be improved, they do contain relevant historic information. For instance, the winter /spring 2013/2014 report (produced in 2016) describes the main A321 through Hurst being flooded in three separate locations (central Hurst being briefly cut off Feb 2014 for normal vehicles), Portaloo deployment in the Sawpit/Lodge Road area, and raw sewage around The Elephant and Castle, etc. The Sandford Lane investigation describes the extent of this regular flooding event but fails to mention the flooding results from high River Loddon level deliberately dumping over the Loddon’s east bank weir towards central Hurst C2. And despite its faults, the 2024 Section 19 report is very relevant as it accurately documents recent and serious flooding around the proposed PiP site, part of WBC Site Ref: 5HU030.

Unfortunately, in this instance WBC appear to be no better at recording Hurst’s flood history, inexplicably also not listing any of the three WBC flood reports in WBC’s 2023 SFRA Site Ref: 5HU030 site-specific flood history – or unbelievably any reports of any Hurst flooding after 2013. See screenshot of 5HU030 “Flood history” - [Ref: Interested Party Comment 44 – Hogmoor PiP App Ref: 260353 Date Received 22/07/2026 \(V\)\(3\)](#)

Whether or not the Applicant’s FRA Contractor has taken a lead from this criminally incorrect and hopelessly out of date “2023” WBC SFRA core data is not known, but it should be a wake-up call for the urgent update of these core documents to prevent further incorrect data misuse and consequent waste of resource.

(B2) The 2024 Wokingham Section 19 Flood Investigation specifically covers flooding in and around “Property 1 in Hurst” (White Rose Cottage) which lies directly downstream at increased flood risk from displaced extra surface water run-off due to any development on 5HU030 site which, raises land levels, reduces site infiltration, and results in faster and increased storm water runoff.

Screenshot of “S-19” Figure 8-1 (left below) shows the location of at-risk White Rose Cottage relative to 5HU030 boundary 175m to the south. S-19 Figure 8.2 comprises four photos of the Hogmoor/Poplar Lane flooding around White Rose Cottage. The S-19 report also includes a photo of foul sewer surcharging in Hogmoor Lane 50m from 5SU030 site adding to and contaminating the flooding (after the rain has ceased) and flood risk across the proposed Hogmoor Lane site entrance.

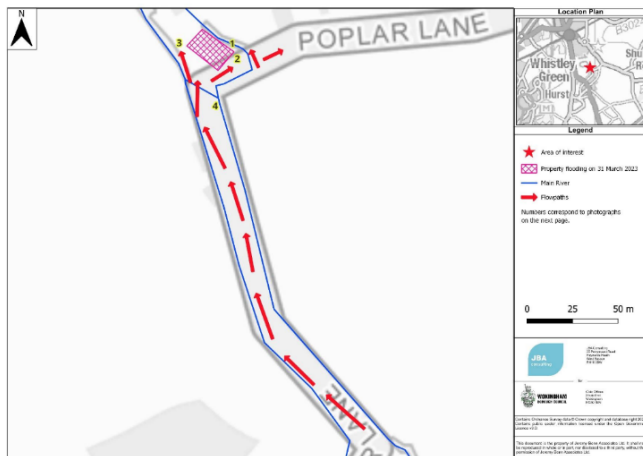


Figure 8- 1: Source-Pathway-Receptor mapping for Hogmoor Lane and Property 1 in Hurst

2.2.3 Mapping and site observations also show the presence of ditches to the north of the site, including along the northern boundary of the site, understood to drain to the ditch which runs along Hogmoor Lane. The location of these is also shown in Figure 2-2.

Figure 2-2 Hydrology



The Calibro FRA Figure 2.2 screenshot (right above) makes it appear there is a risk free surface water drainage path north from the site via the “Kayersbridge Brook” with no mention of the increased “S-19” indicated downstream flood path risk both to near neighbours and particularly White Rose Cottage, where the ditch distinctively kinks around the at-risk property. The FRA really needed to address WBC S-19: [Appendix A “Addressing flooding in Hurst”](#).

Until the agreed water hold-up/storage and derestriction recommendations of the 2024 “S-19 report” have been implemented, and been proved to improve flow into the Twyford Brook, surely no more development increasing surface water run-off in The Green Man and Stow Streams towards White Rose Cottage should be permitted?

Note: Identified as “Kayersbridge Brook” on online GOV.UK Flood maps - locally “Kayers” might be spelt “Keyers”, and this area of Hurst the ditch might be called “The Green Man Stream”, and the ditch to the north “The Stow Stream”. The S-19 report Figure 8-3 refers to flooding at “Keyers Bridge House”.

(B3) Ninety Interested Party Consultation Responses for previous WBC App: 240583 on this same 5HU030 site described recent serious pluvial surface water flooding adjoining the PiP site and included irrefutable photographic evidence, including Main A321 closure due to flooding: [Ref: Interested Party Comment 44 – Hogmoor PiP App Ref: 260353 Date Received 22/07/2026 \(III\)\(1\)](#).

In their search to find “[no historic flood events in the vicinity of the site](#)” did not Calibro review this “proof of evidence” of recorded flooding made in response for previous recent 5HU030 planning applications and appeals? Is it considered Hurst residents’ experience of actual flooding is of “no import” or is inconsequential? Was a lead taken from the WBC Planning Officer’s inexplicable unopposed acceptance of a flawed App: 240583 FRA drainage proposal, and the Planning Inspector Mr T Burnham’s subsequent failure to even mention the word “flood” in his considered points (1) to (62)?

Do WBC as LLFA and WBC Development and Control agree that “views are important to the Council and are fully taken into account”? And will the flooding experience of Hurst residents continue to be completely disregarded and ignored by WBC Planning Officers as

it was with App: 240583? Hopefully residents' concerns will be acknowledged in the WBC Planning Officer's report. Are WBC intending to accurately update WBC the core data flooding history for Hurst and when?

(B4) Our recent experience with the Environment Agency via correspondence and at appeals is that they have some good intentions and ideas but as an organisation appear to be ineffectual, have lost their way, and their on-line data is unreliable. Specifically, the EA appears to be either unable or unwilling to remove Hurst's non-existent EA Main Rivers from the GOV.UK data base. [Ref: Comments – A A Butler – App Ref: 260353 Date Received: 09/03/2026 \(9\)](#) and [APPENDIX \(C\)\(UEAMRM\) Update of the Environment Agency EA main River Map Data Urgently Required:](#)

At the recent 2025 Lodge Road Appeal App: 242067, after initially requesting the significant onsite portion of the Hatchgate Ditch tributary filled-in 15 years ago without approval, be de-culverted and reinstated, the EA backed down. A desirable environmental and flood risk improvement to remove the buried undersized blocked plastic pipe, recover the lost flood compensation capacity this ditch once offered, reduce surface water ponding in the field, and reduce flood risk to the near neighbours was not pursued and is a great improvement opportunity lost.

EA GOV.UK online Main River data for Hurst is demonstrably wrong and at least a generation out of date, and it is strongly suspected EA data referred to for the wrong “no historic flooding” statement in the Applicant's FRA 2.4.1, is similarly inaccurate and in need of urgent EA update.

(C) Firstly, any comments made refer to GOV.UK/EA/OS Flood map online data specifically for **“for planning purposes or scoping a site”**. Not for buying, selling, valuing or other GOV.UK defined purposes.

(C1) GOV.UK Flood maps for flood zones for Hurst display demonstrable anomalies, errors and omissions - specifically for this PiP site, where the site and immediately surrounding area are all classed as Flood Zone (1) at no risk of fluvial or significant pluvial flooding. However, residents' experience is of both Hogmoor Lane and Broadwater Lane being recently completely impassable due to flooding. These online flood zone maps are suspect with errors perhaps in the algorithms but certainly in the topographical EA/OS database. The virtual output should not be used in isolation and especially where it obviously conflicts with experience within pluvially trapped flat Hurst Terrace C2. [Ref: Comments – A A Butler – App Ref: 260353 Date Received: 09/03/2026 \(4\)](#) and [APPENDIX \(B\)\(FZGE\) GOV.UK Flood Zone Map Glitches and Errors to be Reviewed and Improved:](#)

(C2) Pluvial GOV.UK Flood maps for surface water flooding rolled out in March 2025 are flawed, and unjustifiably, optimistically, reduced predicted surface water flood risk. Detail of flooding severity, previously indicated by colour intensity was changed to selected options for Annual Likelihood of Flooding, 1 in 30, 1 in 100, 1 in 1000 years, with 1 in 30 being the default option. This appears to have changed yet again to a change in colour and with 1 in 100 as the default option (perhaps to mask the absurdity of the 1 in 30 default predictions). This has made no difference to the uselessness within Hurst of these misleading surface water flood map predictions.

The 1 in 100 year GOV.UK surface water option still predicts virtually no flooding in Hogmoor Lane at the proposed site entrance (other than within the existing ditch), and none around at-risk White Rose Cottage. Some flooded areas are predicted within the overall 5HU030 site.

The 1 in 1000 year GOV.UK option does predict pluvial flooding in Hogmoor Lane and on 5HU030 site but again none in the immediate vicinity of at-risk White Rose Cottage, “Property 1 in Hurst” in WBC’s S-19 flooding investigation. See screenshot (right) of the current GOV.UK 1 in 1000 surface water flood risk for White Rose Cottage (28/07/2026).



I regard this cynical 2025 GOV.UK downgrade of pluvial surface water flood risk as completely unjustified and a travesty with our own Hurst property previously at “medium risk”, with the porch having to be frantically baled out during a 2024 thunderstorm, an area apparently now at GOV.UK “no risk” as of March 2025.

Ref: Comments – A A Butler – App Ref: 260353 Date Received: 09/03/2026 (4) and APPENDIZ (A)(MSWFR) Misleading GOV.UK Surface Water Flood Risk data:

Overall, the no longer accessible superseded pre March 2025 GOV.UK Surface Water Flood Risk Maps gave a more accurate prediction of the extent of pluvial flooding within Hurst.

The Applicant’s FRA RoFSW mapping 3.4.3 for predicted surface water flooding matches the GOV.UK “for planning” 1 in 1000 prediction but neither prediction matches the depth and extent of surface water flooding recently experienced in 2023. Flooding is predicted elsewhere within the greater 5HU030 site.

3.4.3 The RoFSW mapping indicates there is a mapped risk of flooding running along the eastern boundary of the site which is clearly associated with the ditch in this location, as shown in Figure 3-1.

3.4.4 No other locations within the site boundary are at a mapped risk of surface water flooding.

In the Calibro FRA screenshot referred to above 3.4.4 the computer prediction indicates no surface water flooding on the PiP portion of the site, but Hogmoor Lane the site of the proposed access is predicted to flood; this GOV.UK 1 in 1000 year prediction proven to be a huge underestimate of the surface water flooding extent experienced in 2023.



The Applicant’s concern appears to be only for flood risk for the new build houses; not for the neighbours or Hogmoor Lane access road.

(D) The access route is defined in the Calibro FRA as south of the site, see screenshot below:

3.4.14 The safe access route off the site would be to the south of the site, down Hogmoor Lane and towards Broadwater Lane. Mapping for the medium surface water flood risk, which is equivalent to the 1 in 100 year event including an allowance for climate change, shows an area of flooding on Hogmoor Lane along this safe access route, as shown in Figure 3-1. However, as explained above, it is assessed that the flooding would, in reality, be contained within the ditch alongside Hogmoor Lane.

WBC 2023 SFRA for Site Ref: 5HU030 site specific “Access and egress” states “But access to the site using Hogmoor Lane connected to Poplar Lane is likely to be affected as water depths are between 0.30 and 0.60m: surface water flow paths have entirely covered this route.” This is before additional surface water is displaced by development and ditch flood compensation reduced by filling it in for a new entrance. Ref: Interested Party Comment 44 – Hogmoor PiP App Ref: 260353 Date Received 22/07/2026 (III)(1).



Note the predicted completely flooded area between Long Barn and The Old Posting House, the problem with traversing dirty muddy flood water is that one does not know what lies beneath! The 2023 photo above shows not only a vehicle that has driven off the narrow road, stuck close to the ditch fronting the PiP site – the photo graphically shows the massive underestimate of the depth and extent of flooding close to Apple Tree Cottage by the absurdly low and very optimistic 1 in 1000 year GOV.UK. prediction. Ref: Comments – A A Butler – App Ref: 260353 Date Received: 09/03/2026 (4) and APPENDIZ (A)(MSWFR) Misleading GOV.UK Surface Water Flood Risk data:

Which is correct, WBC’s SFRA or the Applicant’s FRA? It would appear neither, it’s worse than that! Flooding is not “contained within the ditch alongside Hogmoor Lane.”

(E) In the screenshot below the Applicant’s FRA proposes culverting, after filling in a section of the existing Hogmoor Lane north side ditch – in which the vehicle pictured above is stuck.

Capacity Assessment

3.4.17 To facilitate safe access to the site, culverting of the ditch which runs parallel to Hogmoor Lane would be required. Therefore, an indicative capacity assessment of

Arguments made in 3.4.17 to 3.4.26 are concerned only with discharging increased surface water run-off from the site into what remains of the ditch and downstream towards the neighbours, at the end committing to nothing, viz: “the results should be considered to be an estimate.”

(E1) If the applicant were serious about minimizing increased flood risk to the neighbours, should we not see a suitable assessment of how the certain increased surface water run off will be contained in a thunderstorm? Firstly, the volume of potential standing water displaced by the raising of the built-on land. Secondly, due to loss of infiltration the volume of water no longer absorbed running rapidly off rooves and paved areas. Thirdly, the several cubic metres volume of roadside ditch flood compensation capacity lost by the filled in ditch access. This would give some idea of the extra volume of ditch or swale that needs to be created within the development, in front of the properties, to protect the neighbours from increased storm flooding risk. The flooding problems in Hurst happen when it rains heavily. The “suburbanising” of property frontages mainly associated with new development in Hurst, the filling-in of roadside ditches and swales is cumulatively significantly adding to Hurst’s increasing pluvial surface water flooding problems.

(E2) Typical recent examples of loss of roadside ditch and swale flood compensation where no WBC action has been taken to ensure the storm flood compensation is maintained are locations around the Nursery Gardens development in Whistley Green, now driving increased flash surface water flooding onto the main A321 near 5HU030 site, and in Orchard Road where a large new culverted access for Willowmead has removed many cubic metres of ditch compensation capacity, but with the old culverted access left in place.

Google Streetview is a useful tool for viewing earlier photos to see the changes and destruction of essential ditches and swales. This is particularly important in the case of this PiP because it is clear the Hogmoor Lane ditch as it is now not big enough and any access approved by WBC should surely not include filling in any of the existing ditch?

When Hurst's roadside ditches are filled-in and storm flooding compensation lost, will WBC ever require the property owner, or riparian owner to create new adjoining ditch or swale compensating capacity within their property?

(F) Hogmoor Lane residents might strongly disagree with the Applicant's FRA statement in the screenshot below:

3.6.3 The risk of sewer flooding is therefore considered to be **Negligible**.



Thames Water pumping station ineffective

Left is a photo included in WBC's 2024 S-19 flood report of Hogmoor Lane foul sewer manhole surcharging 50m from the PiP site. Right is my photo of the same Hogmoor lane foul sewer surcharging adding to the Hogmoor Lane flooding taken the day after peak pluvial flooding 01/04/2023 when it



was no longer raining. Calibro might consider this negligible flooding; I

don't.

This likely contaminated sewer surcharging, which includes pumped sewage and leachate, has been previously reported to WBC: [Ref: Interested Party Comment 44 – Hogmoor PiP App Ref: 260353 Date Received 22/07/2026 \(III\)\(2\)](#) and [Ref: Comments – A A Butler – App Ref: 260353 Date Received: 09/03/2026 \(5\)](#).

All sources of flooding should be considered a part of a site-specific FRA. This omission applies not only to the Applicant's FRA but also to WBC's SFRA application of the sequential test and exception test for site ref: 5HU030

(G) A google search for "WBC Site Ref: 5HU030 will locate the interactive map [Appendix D – Geo PDF Mapping Site 5HU030](#) indicting wet day reservoir flood risk shown as red hatching in the screenshot below, or use site address:

https://www.wokingham.gov.uk/sites/wokingham/files/2024-05/WBC%20Level%20%20SFRA%202023%20-%20Appendix%20D%20Site%205HU030_0.pdf

The theoretical reservoir flooding extends over the east boundary ditch and would fill it. The reservoir flooding extends more than half way along the Hogmoor Lane frontage and would fill the ditch. This site is at risk from Dinton's embanked Black Swan Lake and its northern stoplog weir less than a mile away.



It may be the reservoir flood risk has been underestimated if the WBC figure of only 200,000 m³ for Black Swan Lake has been used for the computer simulation, or not even the correct reservoirs identified; [Ref: Interested Party Comment 44 – Hogmoor PiP App Ref: 260353 Date Received 22/07/2026 \(VI\)\(7\)](#) and [Ref: Comments – A A Butler – App Ref: 260353 Date Received: 09/03/2026 \(14\)](#). APPENDIX (E)(BSLRFR) Black Swan Laake Reservoir Flood Risk.

In the screenshots below the Applicant's FRA makes light of this risk, but since embanked Black Swan lake was constructed when population density was very low in vulnerable Hurst C2, many more houses have since been built, and it is perhaps now much more important this risk be reassessed.

3.7.1 The EA's 'Reservoir Flood Extents – Wet Day' national dataset predicts flooding in the northeast corner of the site. Again, this flood extent is limited to the ditch which runs parallel to Hogmoor Lane and would not impact the location of the proposed dwellings.

3.7.5 The risk of flooding from artificial sources is concluded to be **Very Low**.

The risk may be very low, but it is a risk which must be considered. How often is the bottom plank of the stoplog weir replaced? What is the risk of mindless weir vandalism or failure of the earth bank. It does happen.

Again, all sources of flooding should be considered a part of a site-specific FRA. This applies not only to the Applicant's FRA but also to WBC's SFRA application of the sequential test and exception test for site ref: 5HU030

(H) Instead of sticking our heads in the sand, is it not time Hurst's flooding issues are recognised by all, the problems worked out, and how they might be ameliorated or solved?

There is an urgent need for incorrect core data describing Hurst's topography and drainage features to be updated by WBC, GOV.UK, Ordnance Survey, the Environment Agency. [Ref: Comments – A A Butler – App Ref: 260353 Date Received: 09/03/2026 APPENDICES](#).

While the Wokingham Section 19 Flood Investigation 2024 S-19 is a welcome start, and the recommendations to derestrict the Twyford Brook will hopefully help reduce flooding at White Rose Cottage, do not expect this work to improve the general pluvial surface water flooding problems within central Hurst.

Comments were made on the S-19 report in September 2024 highlighting deficiencies and areas that should be reviewed and improved, but a consistent theme across the board is the failure by WBC to acknowledge the man-made changes made to the west of Hurst C2 on B1 Loddon floodplain which have created a roughly triangular pluvial C2 catchment area with changed drainage patterns.

Until this reality is recognised by WBC new building on raised land almost anywhere in Hurst C2 will always cause the neighbours increased flood risk. The problem starts at the beginning of S-19 with the incomplete description of Hurst's topography as described in the screenshot below:

3.1 Topography

A large proportion of Wokingham Borough is relatively low lying, particularly in Hurst Parish where the majority of the flooding occurred. Hurst is located within the centre of the district, north of Wokingham and south of Whistely Green. The area is characterised by low lying elevations, surrounded by steeper topographies to the north and south of the district. Areas of steeper topography include the town of Wokingham, southeast of Hurst, as well as Wargrave and Remenham, located in the northern part of the district. Figure 3-1 indicates

Central Hurst C2 is characterised by low lying elevations, surrounded by steeper topographies to the north and south – natural higher land of Haines Hill to the northwest, and Ashridge to the south. However central Hurst is now also surrounded by higher man-made ground to the northwest, the raised landscaping of Dinton with its embanked Black Swan lake, surrounding features, and golf course hill, and to the north, the hills of Hurst landfill replacing B1 River Loddon floodplain, previously flat Whistley Park. This has formed a new man-made pluvial catchment area, a rainfall trapment triangle where all surface water in the west of Hurst now must first flow south around Church Hill, then east past Hatch Gate towards Keyers Bridge, and then north past Hogmoor. When the Twyford Brook is debottlenecked, we shall still see worsening road closing flooding at the bottom of Church Hill.

Surely the time for all the relevant documents to be updated to show Hurst's topography as it is, is now long overdue, and properly identify what is causing the massive mismatch between hopeless GOV.UK Flood risk predictions and residents' flooding experience? This discrepancy needs to be properly understood and recognised. Is the problem legal where WBC wish to avoid admitting any liability for past Council approved changes that have raised and destroyed Hurst B1 River Loddon floodplain?

Before any more significant development takes place within Hurst C2, it is hoped that as LLFA WBC can look again at S-19 follow-up improvement, and work towards a better understanding of the Hurst's changed surface water drainage pattern and flood risk and how things may be improved.

It is also hoped that WBC do not approve the Applicant's inappropriate FRA and refuse this PiP App: 261624, which in view of the planning history for Site Ref: 5HU030, is clearly an attempt to initiate ultimate development of the whole site.