F.A.O: Wokinham Borough Council Planning
Objection submitted by: A A Butler: Address: Cranford Drive, School Road, HURST RG10 0ET
09/02/2025

**Re: Planning Application: 252934 – Land at Lodge Road Hurst, RG10 0SG**

**I strongly object to Planning Application 252934 which proposes significant infill development on an inappropriate low-lying open greenfield site. The proposed site on C2 Hurst Terrace is largely classified as GOV.UK Flood Zone 2 and 3 with no surface water onward drainage routes or sewer connections other than displacing drainage and sewage south towards and onto near neighbours. The Environment Agency statement in the Applicant's FRA APPENDIX 5 states: "the location is in flood zone 3", this high risk based only on river "fluvial and tidal" flooding and not including likely coincident pluvial surface water flooding and sewer surcharging, or considering the less obvious flood risks from Black Swan Lake reservoir and ground water, etc.**

**Sensibly, there should just be no more building at all on this low 37m AOD area of Hurst where pluvial surface water is now trapped by 50ha of man-made landscaped hills immediately west of Lodge Road. Concealing 2 million tonnes of general waste, these 45m AOD capped hills now causing increased pluvial surface water run-off towards Hurst, have blocked any previous Whistley Park drainage ditches north and west of this Lodge Road site. With the waste landfill and its perimeter ditch acting as a conduit for zone 3 flooding within just a few metres of the proposed site, there will be ever present leachate and waste gas migration risks for any development.**

**I also very strongly object to the spurious, inconsiderate, factually incorrect, and sinister arguments now being advanced by the Applicants' FRA and FLOODING SEQUENTIAL TEST documents both for this Application: 252934 and for the adjacent plot Application: 242067 with identical flood risk issues. Ominous arguments suggesting it is now acceptable for WBC and Planning Inspectorate to approve development knowing that seasonal flooding will happen and that it is safe and acceptable for residents to occasionally expect to have to traverse flood water 200mm or 8 inches deep either on foot or by vehicle. Together with the GOV.UK roll-out last March of significant and unjustified downgrades of the severity for official predictions for Hurst's surface water flooding, namely using the "new" and reduced once in 30 years GOV.UK "default" prediction, Hurst is predicted to be virtually flood free! Unlike Hurst's actual regular surface water flooding recently photographed by residents which shows actual flooding experienced exceeding the "new" GOV.UK only once in a 1000 years flood risk predictions. And with the Planning Inspector for the recent Lodge Road Appeal stating in Other Matters 70. "Some other matters relating to flood risk have been raised in representations but are not of such import that they materially affect the outcome of this appeal." – matters raised of apparently "no import" such as: "the river which an Applicant proposes to use for drainage does not exist", and "March 2025 GOV.UK default 30-year surface water flood risk introduced an absurd, unjustifiable, and unrealistically reduced apparent risk", and "no Thames Water approval given for proposed sewage disposal", etc. It is very concerning that these actions would be consistent with implementation of an overall very short-term government policy to "lower the bar" and sanction just building using the "weight" of spurious arguments backed up by the new "March 2025" false, unverified, and absurdly benign once in 30 years "default" storm flooding extent hoping the public won't notice this sinister change and consequential harm likely to be caused. It is hoped Woking Borough Council Planning would never support such a damaging, inconsiderate and costly policy for the future of Hurst and its existing residents and refuse Application: 252934.**

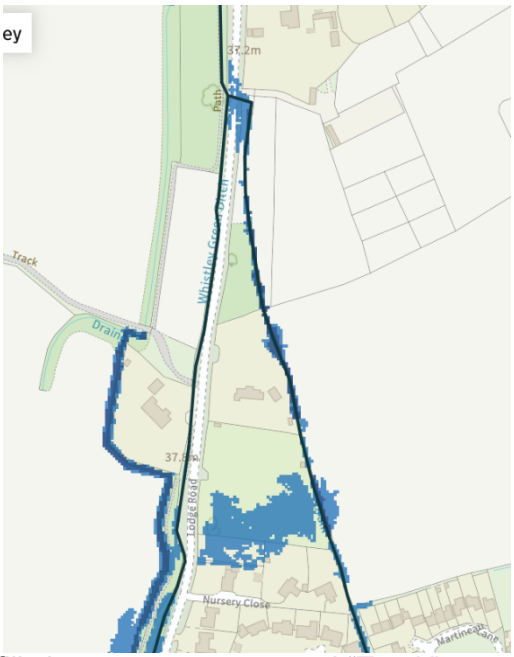
**Detailed comments justifying refusal of App;252934 follow:**

**(1.0) The Applicant's PLANNING FORM REDACTED 252934 "Assessment of Flood Risk" appears to have been completed incorrectly. Three of the "Yes" or "No" statements need to be reviewed by WBC Planning and resubmitted correctly by the Applicant as follows:**

**(1.1) "Is your proposal within 20 metres of a watercourse (e.g. river stream or beck)?" - Answer given by Applicant "No"; should not the correct answer be "Yes"?**

Wokingham Borough Council Planning will know from Interested Party responses to WBC Planning Applications for the adjacent site Application: 242067 Lodge Road, and a currently very sensitive site Application: 253074 Willowmead fields, there are different ways of looking at flood risk; using inaccurate virtual online GOV.UK/EA/OS data, using inaccurate and deliberately biased Applicant's submissions, or sensibly by WBC Planning assessing the actual site as it really is.

**(1.1.1) Consider official GOV.UK/EA/OS online data:** Looking first at GOV.UK/EA/OS data for EA Main Rivers shown in the photoshoot (right) of the current GOV.UK Flood Maps for Planning, Application: 252934 site location can be seen to the right (east) of Lodge Road bordering the Flood Zone 3 east side ditch and substantially covered mainly by medium blue Flood Zone 2 which, to the south extends into neighbouring properties in Nursery Close and crossing the eastern boundary into the Lodge Road fields site Application: 242067.

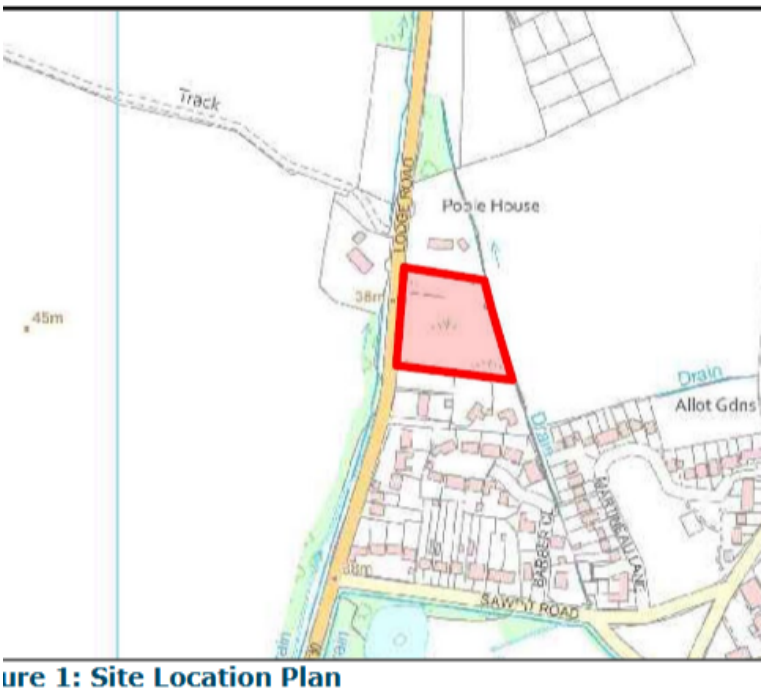



**Plot East Side:** Where the eastern boundary of this proposed site meets with the boundary of the Lodge Road fields site, and annotated with a black line, is a tributary of the Hatchgate Ditch. Hence to the east the proposal is within "0" metres of a watercourse currently officially designated online as "EA Main River". Hence the "Yes" box should have been ticked.

**Plot West Side:** To the west of the site, another online "EA Main River" is shown as a continuous black line running north* just west of Lodge Road in front of "Old Lodge" and Summerleaze landfill site entrance annotated "Track". South of annotated "Whistley Green Ditch"* this waterway apparently lies within 20m of the proposed site and on this basis alone the Applicant should have again ticked the "Yes" box. If this is a case of spurious semantics, the Applicant perhaps claiming an absence of the word "ditch" or "swale" in WBC's question allows a "No" answer, in this case the Environment Agency and GOV.UK/EA/OS online data classifies and annotates what one might normally call "ditches" as "EA Main Rivers".

**GOV.UK Maps refer to this virtual non-existent* northern section of the "Hatchgate Ditch" beyond "Old Lodge", which developers are mistakenly intending to use for drainage, as the "Whistley Green Ditch". Currently still wrongly shown in GOV.UK/EA/OS online flood maps, most of these annotated ditches or "EA Main Rivers" in and around "Whistley Park" no longer exist. For relevant details regarding defunct Whistley Green/Hatchgate and other destroyed ditches see:* ***APPENDIX (B)(UEAMRM) Update of the Environment Agency EA Main River Map Data Urgently Required:***

**(1.1.2) Consider Applicant's FRA submission "Figure 1":** Looking at page (2) of the Applicant's "Flood Risk Assessment, Site Location & Topography, Figure 1: Site Location Plan"(part shown in the screenshot right and below). The Applicant's map identifies in red the boundary of a marshy 37m AOD proposed site in the context of immediately surrounding land and drainage ditches. Low-lying 37m AOD land vulnerable to flooding lies to the south, east and north of the site. Higher man-made capped waste landfill lies to the west, where beyond Lodge Road shown at 38m AOD the waste hill rises to 45m AOD with its increased pluvial storm water run-off* now east towards Lodge Road and the site.



ure 1: Site Location Plan

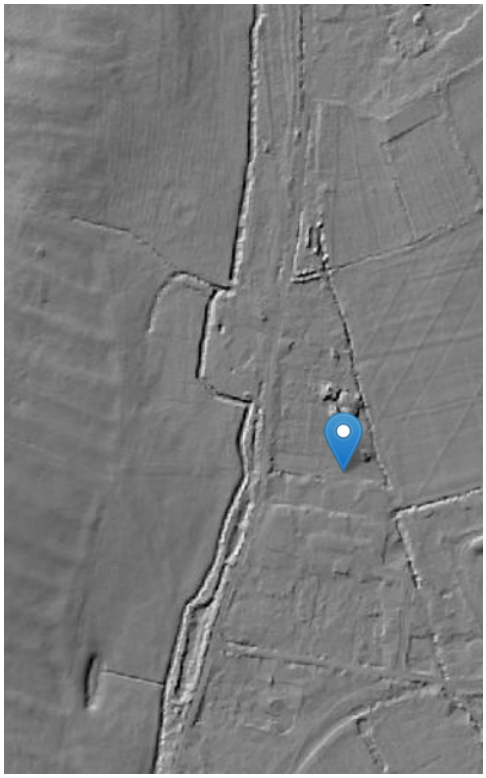
*Pluvial surface water waste hill run-off east towards Hurst drains first to the landfill perimeter ditch which is not shown on the Applicant's map and is the main conduit for zone 2 and 3 fluvial flooding.*

**Plot East Side:** The Hatchgate Ditch tributary marking the eastern boundary of the site is marked in blue and annotated "Drain". Clearly the Applicant's own documentation again shows this site boundary within "0"metres of a watercourse. Hence considering the eastern boundary alone the Applicant's own submissions (Figure 1 and full map FRA APPENDIX 1 Site Location plan) require a "No" response to be changed to "Yes". This degraded eastern boundary ditch is shown correctly terminating on Application: 242067 plot, but the watercourse flow direction arrow indication is clearly wrong indicating an impossible flow north along the closed ditch with no outlet. Any ditch flow or drift will be south towards existing low-lying development* to the south in the lower western arm of Hurst's "reversed "C" development*.

**With the site's east boundary "Drain" only draining south, what is not shown on Figure 1 in the low-lying Sawpit triangle opposite Martineau Lane, is the new development "Little Acres" which, with no infiltration drainage and larger than expected, has itself already added to local surface water drainage issues. Similarly, the Applicant's larger APPENDIX 1 Site Location Plan also does not show the Little Acre "Sawpit" development, which is also not yet shown on normal Ordnance Survey maps.*

The LiDAR topopgraphy (below right) confirms the east boundary ditch runs north to the right of the site marker, east of Lodge Road and east of Pool House/Badger's Bottom. This once tributary of the Hatchgate Ditch is shown correctly (as in Figure 1) terminating, filled-in and blocked within the site of Application: 242067.*

**Directly limiting surface water onward drainage from the proposed site for further details of the destruction of, and removal of this "EA Main River" flood compensation 15 years ago with no reinstatement action enforced to date by WBC Planning Development and Control, see:* ***APPENDIX (C)(HDDBFN) Hatchgate Ditch Destruction Blocking Flow North:***



**Plot West Side:** West of the site the most prominent feature on LiDAR (right) is the Hurst Landfill perimeter ditch running north to south, segregating possible contamination from the capped waste landfill hills rising to 45m AOD the west. Where this major new ditch diverts sharply at "Summerleaze site entrance" around "Old Lodge", first towards the site then again sharply south, the remains of the Hatchgate Ditch* can just be seen within 20m of the western boundary of the site marker leading to the more prominent swales. Again, this ditch just west of Lodge Road requires a "Yes" tick from the Applicant for its proximity to the site.

This section of Lodge Road ditch running south into the roadside swales is also shown in blue on the Applicant's Site Location Plan but again with flow arrows pointing in completely the wrong direction* north towards a blocked dead end.

**As can be seen from the LiDAR scan, and on Google Streetview, the roadside Hatchgate or Whistley Green ditch close to Lodge Road no longer exists in front of, and north of "Old Lodge" although still wrongly shown as existing on the Applicant's Site Location Plan and Figure1. For full details see* ***APPENDIX (C)(HDDBFN) Hatchgate Ditch Destruction Blocking Flow North:***

**(1.1.3) Consider Applicant's ENVIRONMENTAL DESK STUDY:**


**East side:** The Applicant's submitted ENVIRONMENTAL DESK STUDY, Photograph 4 Showing land drain at the eastern boundary, in the screenshot (right) again conclusively shows the site is within "0" metres of ditch again requiring a "Yes" response, albeit a degraded, badly maintained section of Hatchgate Ditch tributary that the riparian owners need to clean up.

**West side:** The same submitted Applicant's document includes Photograph 5 "Showing the stream to the fairly immediate west of the site", see screenshot (right). This again degraded roadside Hatchgate Ditch on the opposite side of Lodge Road to the site, is not really a stream* as it drains south but only as far as the flood compensation swales to the west of Lodge Road opposite Sawpit Road which are clearly visible on the LiDAR map (above) and have no onward drainage ditch.* Again, the Applicant's own submitted photos require a "Yes" answer to being within 20m of an "EA Main River".

**No roadside drainage ditches currently exist along either side of Lodge Road south of the swales opposite "Sawpit". The ditch shown just west of Lodge Road in GOV.UK Flood Map (screenshot right) and subject to Flood Zones 2,*

*and 3, posssible leachate contamination, is the Summerleaze Hurst Landfill perimeter ditch. All drainage from the proposed Lodge Road sites will now be south and east of this ditch over the surface anticlockwise around Hurst Hill. WBC Planning should note Application: 253074 Willowmead Fields drainage will also have to follow this route. This unacceptable situation where no waterways exist is highlighted on GOV.UK Flood Maps for planning as "Issues" in the screenshot ( right). Although GOV.UK have apparently annotated this "Issues" detail correctly, serious problems rendering GOV.UK Flood Maps for Planning as very poor or useless as a sensible flood prediction tool for Hurst are covered in:* ***APPENDIX (A)(MSWFR) Misleading GOV.UK Surface Water Flood Risk data: and APPENDIX (F)(UOSMH) Update Ordnance Survey Map for Hurst:***

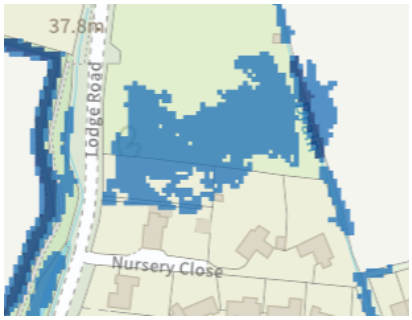

**(1.2) Will the proposal increase the flood risk elsewhere? – Answer given by Applicant "No"; surely the answer must be "Yes"?** As must be very clear from issues raised in **(1.1)** above, additional water supply to the site, resulting in domestic grey water and sewage, and reduction of the site's existing flood compensation capacity with "Archimedes-type" surface water displacement off the site due to Application: 252934 proposed buildings, hard surfaces, and embanked raised pond, will logically increase flooding elsewhere. With the local Hatchgate Ditch tributary system blocked north and south, this increased surface water discharge from the site has nowhere else to go and will increase flood risk right across the lower low-lying west arm of Hurst's reversed "C" residential development, around Sawpit and Lodge Road.

The now disconnected network of old Hatchgate Ditch tributaries is effectively a "Sawpit Swale" or pond, in summer mostly stagnant collecting and allowing infiltration of local surface water drainage, and in winter and spring filling-up and overflowing south and then east around Church Hill. The recent Little Acres development, not shown in the Applicant's Figure 1, and now also discharging surface water into this "Sawpit Swale" won't have helped matters, but being connected to the Thames Water sewer system "Little Acres" is without the public health risk of this Application: 2520934 which is to discharge treated sewage effluent towards neighbouring properties.

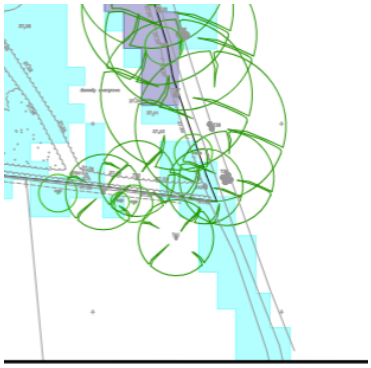
**(1.2.1) Online GOV.UK Flood Maps do not predict the seriousness and frequency of Hurst's flooding and likely cross-contamination affecting neighbours of this Lodge Road site:** A March 2023 photo (right) shows surface water flooding crossing from the flooded Application: 252934 site and eastern boundary ditch towards and across the neighbour's property in Nursery Close.

Submitted to WBC in August 2025 with Interested Party comments applicable to the recent Lodge Road Appeal (the continuation Lodge Road site seen in the background beyond the flooded boundary ditch), the relevant Interested Party comments, including this photo, remained relatively hidden as a "CD" document and were not posted by WBC on the normal Application: 242067 "Documents for Reference" website until October 2025 – five days after the Planning Inspectorate's decision to refuse the appeal 09/10/2025! Hence this 2023 photo is again submitted as it graphically shows a serious surface water flooding situation, occurring much more frequently and to a greater extent than suggested by misleading GOV.UK predictions. Two screenshots (below) from GOV.UK Flood Maps, will help to highlight the inaccuracy and irrelevance of GOV.UK surface water flood predictions for the corner of the neighbouring garden pictured,

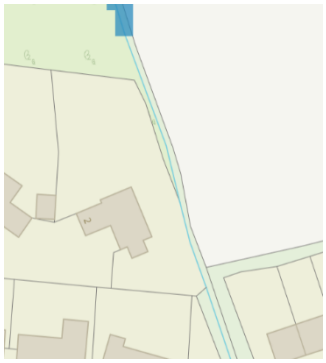
whose flood risk will be increased by the Applicant's development, hence requiring a "Yes" answer to the flood risk question.




GOV.UK Flood Zones Map*screenshot (left) shows zone 2 and 3 fluvial flooding impacting Application: 252934 plot and boundary ditch but not predicting actual flooding extent into the neighbouring Nursery Close garden pictured (above).



GOV.UK 1 in 1000 years Surface Water Flood Risk Map** screenshot (right) again does not show the pluvial flooding extent pictured (above), just flooding over the boundary ditch.



Patronizingly, following what was clearly just an unchecked data manipulation exercise, the current March 2025 roll-out "default" 1 in 30 GOV.UK pluvial surface Water Flood Risk see screenshot (right) is for no flooding at all in the neighbouring Nursery Close garden pictured flooded (above) in 2023. According to GOV.UK/EA/OS the pictured extent of flooding won't happen in the next 30 years, not even in the boundary ditch, not even in the next 100 years, and not even in the next 1000 years!

Presumably based on this false GOV.UK data - right at the start, the Applicant's FLOODING SEQUENTIAL TEST AND EXCEPTION TEST document misleadingly and wrongly states in 1 INTRODUCTION AND GUIDANCE BACKGROUND 1.1, the site "being prone to long term surface water flooding." The 2023 Nursery Close flooding "Proof of Evidence" pictured (above) is clearly "short-term" and typical of pluvial flooding regularly experienced in Hurst several times in the last few years. Surely by now Wokingham Borough Council as LLFA must know the 1 in 30 "default" predictions of the new GOV.UK maps for surface water flooding used by the Applicant are an unjustified, massive, irresponsible downgrade of the real surface water pluvial flood risk regularly experienced in Hurst and should never be used to justify an absence of real-world flooding to permit building on land known to flood like this site. Even the GOV.UK once in a thousand years pluvial flood risk prediction in the screenshot (above right) is obviously much too low! Surely, Wokingham Borough Council Planning should not now approve the use of this useless, irresponsible GOV.UK data which central government should retract, and which will lead to misinformed decisions and harmful and damaging outcomes. Are WBC Planning able to advise on their legal position with respect to an Applicant using this GOV.UK data now known to be false for Hurst, how it might affect house insurance claims and whether an ombudsman should be involved with what has been done?

**For more details regarding questionable GOV.UK online data see:* ***APPENDIX (D)(FZGE) GOV.UK Flood Zone Map Glitches and Errors to be Reviewed and Improved:***

*** For more details of this absurd official downgrade of flood risk see:* ***APPENDIX (A)(MSWFR) Misleading GOV.UK Surface Water Flood Risk data:***

**(1.2.2) Additional domestic grey water and treated sewage effluent will discharge to the existing east boundary ditch:** Recognising there is no possibility of connecting to a nearby Thames Water sewer, the Applicant's FRA 3.24 states: "A package treatment plant will therefore be provided which will discharge treated effluent to the existing ditch." This means discharging all extra clean water supplied to the site by Thames Water, resulting in additional domestic grey water and treated sewage effluent ending up in a ditch shared by immediate neighbours in Nursery Close and near neighbours in Martineau Lane. Surely to approve this would be madness, stagnant with no flow in summer and who knows what being discharged under storm conditions would be not only inconsiderate and antisocial, but also surely unacceptable as an obvious health and environmental hazard?

**(1.2.3) Where is the flood compensation provided for the proposed embanked pond that will displace the site's existing flood compensation capacity?** Like neighbouring Application: 242067, a nonsense proposal for a raised embanked pond which itself will displace existing flooding increasing flood risk elsewhere. Where is the replacement flood compensation provided onsite for flooding displaced by the raised embanked pond structure already full of domestic drainage? Any sensible pond on site with a surface level near 37m AOD, and being flood zone 2 will nearly always be full of water in winter and spring.

Bearing in mind combined with reduction in on site infiltration capacity, the consequent increased and more rapid surface water run-off from all the new-build hard surfaces will be into the raised attenuation basin, the Applicant's FRA 3.6 states: "for the first 5mm of rainfall will not result in runoff from the site to surface waters." Which begs the question what happens when more than ¼" rain falls in a typical Hurst thunderstorm? What else is going to happen but the pond's contents will overflow and increase flood risk elsewhere.

**(1.2.4) Does FRA include for "Sawpit-type" Reserved Matters Growth?** Application: 252934 typically gives no figured dimensions for the proposed buildings specifying firm details for each house for finished floor level, maximum external finished overall depth and maximum overall width across the eaves etc. All that is provided is the CIL internal floor area and indicative drawings with "Do not scale", and when the drawings are scaled it is difficult to match floor areas with what is shown in the drawings. Are carports and garages around 40 square metres included in the house CIL floor area figure or separate. When it comes to surface water run-off it is the roof area that matters, and with 6 internal carparking spaces and at least 5 outside parking spaces, is there going to be similar roof run-off growth of 30 to 40% as happened with "Sawpit" during the "reserved matters" stage where ground plan "to scale" increased 40% and two storey properties became three? Any reserved matters growth as happened with the Sawpit development will only increase run-off and flood risk elsewhere and the Applicant's FRA should either include for run-off growth, or surely WBC Planning should request proper finished external dimensions of all houses and ensure they are not exceeded during build to limit flood risk elsewhere?

**(1.3) How will surface water be disposed of? – Answer given by Applicant "Pond/lake"; don't they mean "Existing water course" or "Towards the neighbours"?** The Applicant's FRA states in 3.24 "A package treatment plant will therefore be provided which will discharge treated effluent to the existing ditch." From evidence already presented every bit of drainage from the proposed site will ultimately end up in the site's east boundary ditch, or next door in Nursery Close. As stated earlier this is not just a boundary ditch, it is officially a GOV.UK/EA/OS "EA Main River" and the Applicant should surely have ticked "Existing water course". If this development goes ahead the ditch will also become an open cess pool ultimately overflowing southwards in rainy periods.

**(2) Spurious False Justification To build On Land Which Floods:** As highlighted in **(1.2.1)** the Applicant's FLOODING SEQUENTIAL TEST AND EXCEPTION TEST document starts by misleadingly and wrongly stating in 1 INTRODUCTION AND GUIDANCE BACKGROUND 1.1, the site as "being prone to long term surface water flooding." Yes, very much so, but importantly, of much more concern, and based on actual flooding history, the site is clearly prone to significant regular short-term flooding. Many documents are then referenced where questionable decisions have been made to presumably and perversely justify making a poor decision to build at the Lodge Road site - despite the likely expectation of flooding. Also, it appears the document is biased at preventing flooding issues with the new houses rather than addressing the real concerns of existing residents with respect to the effect the development will have on increasing flood risk to their properties . The first document referenced is appropriately for the adjacent Lodge Road plot Application: 242067 **Appeal Ref: APP/X0360/W/25/3364304 Land between Lodge Road and Tape Lane, Hurst RG10 0EG Decision date: 10th November 2025**. The relevance of statements made in this document is questionable because although the overall decision to refuse the

appeal on failing the sequential test was correct, supporting WBC Planning and WBC's original correct decision to refuse planning approval, some of Mr Guy Davies' decisions must have been based on him being given wrong information. Such as in paragraph 71, the Inspector states: "Thames Water raises no objection to the proposal in terms of foul drainage capacity". This is not true, Thames Water letters on WBC Planning files were included in the Applicant's original application where Thames Water specifically objected to the Applicant's proposed use of the necessary pumped sewage proposal, specifically stated there was insufficient capacity in Hurst's clean water supply for the development, and specifically would not allow use of Thames Water sewers for discharge of surface water. There are many more detailed problems with the Inspector's statements, which is perhaps why it is so important to get key core topographical information and flooding records up to date for Hurst should they be used for reference.

We don't know what is going on behind closed doors, but worryingly, this Application:252934 FLOODING SEQUENTIAL TEST AND EXCEPTION TEST tome making a case to ignore the Flooding Sequential Test by weight of paper referenced, coupled with the absurdly lowered March 2025 GOV.UK surface water flooding predictions for Hurst, is consistent with a sinister officially backed policy to sanction building on land which regularly floods. In the case of Application: 242067 the Appellant made very late, beyond cut-off date submissions, immediately posted on WBC's Planning website 09/09/2025, full of untruths which were not challenged by WBC's Mr Lewin and Mr Croucher, and which Interested parties were given no opportunity to respond to or challenge.

It is aspects of these late unchallenged submissions which were considered extremely worrying, and these documents are referenced in the referenced Appeal decision as CD 5.15, CD 5.16 etc. It is difficult to cross-reference the CD appeal file designations but for example one such document, which ultimately applies to Application: 252934 is "Supplemental Proof of Evidence, Ian Walton 09/09/09" on page 34 of 242067 of "View Plans & Documents", which remains posted promptly and unchallenged on the normal WBC Planning website. These documents appear to advance harmful and sinister arguments to approve building knowing that a site is likely to flood. It is hoped that WBC firmly reject such arguments as put for example by Mr Ian Walton "expert witness" in the screenshot below:

2.17 To set this is context, this is effectively still water that would reach just above the ankle of an adult and so with care could be traversed on foot should the need arise. The height of the underside of the average small family car is circa 0.2m and so again, with care the floodwaters could be traversed in a car should the need arise. This is principally why the '*Hazard to People Classification'* is considered *'Very low hazard – Caution'*.

2.18 The maximum depth of flooding along the internal access road during the extreme flood is 0.21m and the maximum velocity is 0.18ms$^{-1}$. It is my understanding that emergency service vehicles can readily traverse floodwaters of this depth and velocity along with the majority of motor vehicles. With this depth of flooding and low velocity of floodwater, there is no significant risk of vehicles being destabilised or washed away.

2.19 I therefore conclude that residents and users of the proposed development would be able to safely access and exit a building during a design flood and to evacuate before an extreme flood. It is clear from Table 2-1 above that the c
slowly.

Surely WBC Planning and the planning inspectorate should just not consider such stupid spurious arguments that it is safe for the old and young to expect to walk through mucky Hurst flooding* inches deep, contaminated with surcharging sewage and leachate, hiding kerbs and uneven verge and ditch edges. These submissions should have been challenged at appeal and retracted. As can be seen in the 2023 photo (right) of A321 pluvial flooding in Hurst near Thames Water's Wokingham Road pumping station, vehicles just do not normally "traverse" flooding with due consideration for the residents.

Technically the height of the underside of a Volkswagen Golf, or Skoda, or Seat etc. can be 131mm. With tyre wear and suspension settlement and with driver and passengers, this clearance is more likely to be around 0.1m or 4 inches half the 0.2m suggested by Appellant's expert witness Mr Walton. Not mentioned at all is the damage likely to be caused to expensive sensors under the car and particularly to the emissions control system. Most importantly the Oxygen sensor fitted to the catalytic converter needs to operate at over 300 degrees (ideally 800) and has an output of less than 1 volt (0.1V to 0.9V). Hence, anyone who thinks they can drive through dirty flood water 8 inches deep with no problem in a fuel-injected vehicle may be in for some very expensive repair bills. And if met by an oncoming inconsiderate speeding driver creating waves which cause flood water to enter the engine air intake, then the engine will be destroyed. It is a nonsense getting into such spurious discussions, when surely Woking Borough council Planning should just not be considering building where it is likely to flood, cause regular harm, public health issues, and consequent costs to Council tax payers' property, both built and vehicular – or their shoes and socks!

**(3) Interested Party Matters "Of Not Such Import":** As the first document referenced in Application: 252934 Applicant's FLOODING SEQUENTIAL TEST AND EXCEPTION TEST is Application: 242067 for the neighbouring Lodge Road fields, and what the Inspector had to say regarding Resident's comments in "Other Matters" is relevant. In paragraph 70 Mr Guy Davies states: "Some other matters relating to flood risk have been raised in representations but are not of such import that they materially affect the outcome of this appeal."

As these "other matters relating to flood risk", submitted in good time by Interested Parties, but not posted by WBC Planning on the normal application documents for review WBC Planning website until 5 days after the Inspector had made his decision, it is worth highlighting some of these relevant "other matters" not raised or discussed at the Lodge Road Appeal but which are equally applicable both to this Application; 252934 and other recent planning applications and appeals in central Hurst. It is recognised the Inspector may have made his decision before reading the documents covering issues described in the following Appendices:

**APPENDIX (A)(MSWFR) Misleading GOV.UK Surface Water Flood Risk data:**

**APPENDIX (B)(UEAMRM) Update of the Environment Agency EA Main River Map Data Urgently Required:**

**APPENDIX (C)(HDDBFN) Hatchgate Ditch Destruction Blocking Flow North:**

**APPENDIX (D)(FZGE) GOV.UK Flood Zone Map Glitches and Errors to be Reviewed and Improved:**

**APPENDIX (E)(BSLRFR) Black Swan Lake Reservoir Flood Risk and procedural irregularities:**

**APPENDIX (F)(UOSMH) Update Ordnance Survey Map for Hurst:**

**The Applicant has submitted a planning application including forms not truthfully completed supported by inaccurate documents including incorrect and out of date details. Inaccurate and misleading official data available online has been used without additional checks being made, consequently I do hope Wokingham Borough Council Planning refuse Planning Application: 252934.**

**APPENDIX (A)(MSWFR) Misleading GOV.UK Surface Water Flood Risk data:**

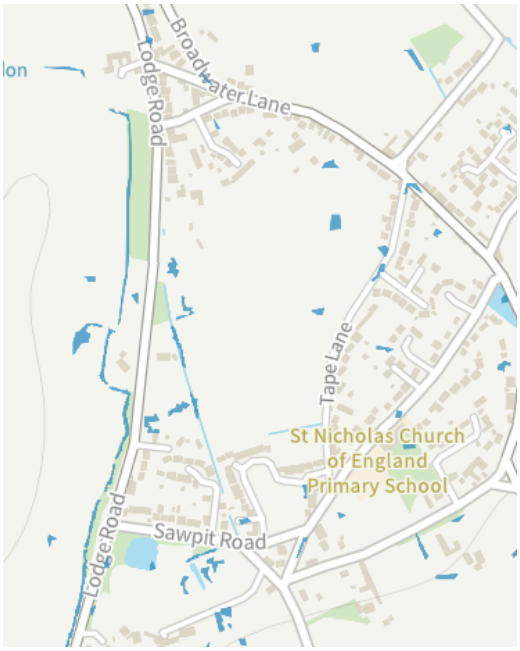
**(4.2) New "1 in 30 Annual Likelihood of Flooding" GOV.UK Flood Maps for pluvial surface water flooding are a misleading downgrade of previously predicted flood risk, grossly inaccurate, and should not be used for Hurst; unbelievably the 1 in 1000 year GOV.UK prediction now more accurately represents the typical annual winter/spring situation within Hurst , even that 1 in 1000 years prediction proving less than flooding recently experienced:**


Pre March 2025 the GOV.UK Surface water Flood Map classified the pluvial flood risk using four colours on the same map for high, medium, low and very low risk, see photo (left). This gave an immediate indication of the areas most at risk and the extent of possible flooding.

With respect to this Application: 252934 and if one looks carefully, this superseded map accurately shows the correct extent of flooding photographed in (1.2.1) covering most of the neighbouring Nursery Close garden.

The March 2025 roll-out maps use only one flooding colour and rely on options being selected, once in thirty years, once in a hundred years and once in a thousand years. The full extent of the predicted flooding has been reduced and the "default" setting is 1 in 30 years or a prediction of "no flooding".

In the screenshot (right), the new theoretical default, and severely downgraded unrealistic 30-year flood risk predictions rolled out in March 2025 are a misleading travesty; don't be fooled into thinking that just because this is a new government/EA/OS roll-out it is an improvement! This appears to have been a sinister government-backed data manipulation exercise to downgrade apparent surface water flood risk without reference to actual flooding history. A possible purpose being perhaps to make it easier to allow developers to override legitimate local objections and build on land which floods?




How absurd the "new" default GOV.UK predictions really are can be appreciated by considering one of the flooded properties White Rose Cottage the subject of the recent WBC " S-19"flood report.

In the screenshot (below left) the 1 in 30 years default option of the GOV.UK surface water flood map shows no flooding at all. The press photo of White rose Cottage (below centre) shows actual flooding. In the screenshot (below right) the 1 in 1000 year flooding officially predicted only affects the nearby ditch. What is Wokingham Borough Council's view on the use of this false data for planning applications?



A little way from white Rose Cottage for example, roads surrounding the proposed “Land North of Hogmoor Lane” site pictured below apparently will no longer flood.

The main A321 Broadwater Lane impassable flooding recently photographed (left) extending across “Buttercups” front garden is now a GOV.UK once in 1000 years event.

The recent road and ditch flooding photographed in Hogmoor Lane and published in the press (above right) is predicted not to happen in a lifetime.

Thames Water apparently have no record of sewer surcharging close to A321 (S-19 report, and photographed in 2023, right below) adding to Hogmoor flooding just does not appear on the flood map. The sewer surcharging resulting from pumped sewage from either Wokingham Road, Hogmoor and Sawpit pumping stations, and leachate from Summerleaze waste landfill, and not able to be handled by Broad Hinton.

Similarly, GOV.UK now predicts almost no flooding at all is expected in Tape Lane (left)! This is where Willowmead fields development run-off drainage is most likely to drain in a storm and where Lodge Road developers planned an emergency access from the fields to the right.

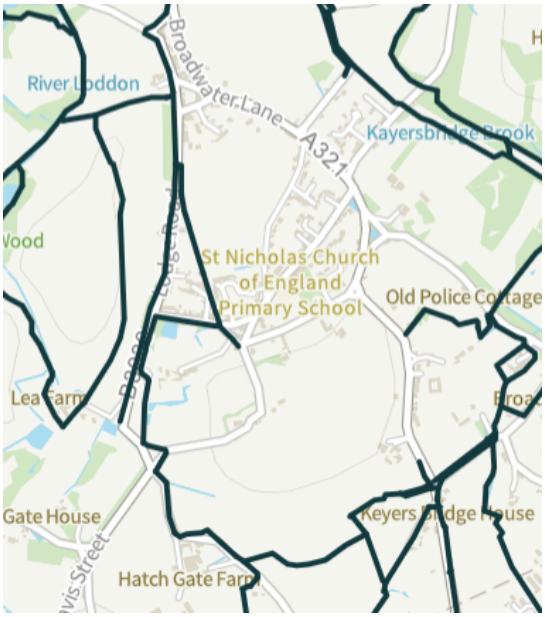
Photos above generally apply to the C2 central village area of Hurst Terrace, but the new GOV.UK March 2025 roll-out of irresponsible underestimates of Hurst’s once in 1000 years surface water flooding predictions, apply equally elsewhere across Hurst as the screenshot of the GOV.UK flood map of I1/K1 Broadcommon Lane (right) demonstrates.

The current 1 in 1000 GOV.UK surface water flooding prediction beyond C2/I4 at Billingbear Brook bridge in Broadcommon Lane (K1/I1 boundary), above shows the road still centrally clear for traffic. The photo (right) shows the road fully flooded, flooding worse than the GOV.UK once in 1000 years prediction - the muddy water too deep for pedestrians to cross comfortably or safely in walking boots - with hazardous deep ditches both sides and the sharp drop to the roadside Billingbear Brook obscured, makes this flooded road potentially extremely hazardous for pedestrians, cyclists and motorists. Broadcommon Lane's adjacent Billingbear Brook not flooded can be seen in the photo (left) – this single track road was never intended for heavy traffic!

Knowing this official flooding prediction information is clearly false, WBC must surely assess whether use of this false GOV.UK data is open to legal challenge, and meantime advise the Developer that this new GOV.UK online flooding data does not match Hurst's recent and regular flooding history and should never be used as a basis for Hurst flood risk assessment or predicting the theoretical outcome of worst case or unlikely flood events to justify their building on land which floods. For instance, for Willowmead fields which ultimately will use the same "Lodge Road" surface water drainage route - Applicant's unrealistic statements in Drainage Strategy Report 3.1 Surface Water drainage, like: "The calculations confirm no flooding occurs during the worst case 1 in 100 years storm event with a 40% climate change allowance."

Hopefully, as responsible LLFA and appreciating Hurst's unusual local topography and resultant enhanced flood risk, Wokingham Borough Council will not allow this bogus GOV.UK March 2025 surface water flooding information to be irresponsibly used by this Lodge Road site Applicant and refuse planning permission, or by the Willowmead fields Applicant to falsely gain planning approval for Willowmead PI drainage Condition (97).

**APPENDIX (B)(UEAMRM) Update of the Environment Agency EA Main River Map Data Urgently Required:**




Some EA Main Rivers (local drainage ditches), shown on GOV.UK Flood maps annotated black (screenshot right) are misleading and inaccurate, showing and annotating digital virtual EA Main Rivers that no longer exist, displaced by Hurst Landfill a generation ago. Particularly relevant to Hurst, are the now non-existent northern sections of the Hatchgate Ditch directly connecting with River Loddon - still wrongly and very misleadingly shown as potential waterways for onward drainage to the north and west of Hurst. All increased surface water run-off from the proposed Lodge Road development (as well as the current Willowmead fields development) will now take the tortuous southern/eastern route, draining first towards Sawpit Road, Lodge Road, then seeping south and east around Hurst hill towards Keyers Bridge – contributing to "S-19" flooding.

At the recent "Lodge Road" Appeal Application: 242067 it was asked directly "when will the Environment Agency update their wrong and misleading online GOV.UK/EA Main River data" but the question received no answer from EA representatives present or anyone else. Summarizing the EA response to a previous similar written request to correct the maps, the EA stated in their email response that *"While there is a process for challenging the flood map, there is not currently a process for challenging the main river data set."* See: EA reference Subject: GE35642_DC FW: 240910/IL16 – Wokingham Borough Council Planning App: 242067 22/10/2024. Subsequent follow-up emails have been sent to Joanna Marchant representing the Environment Agency at the Lodge Road appeal, but no response has yet been received.

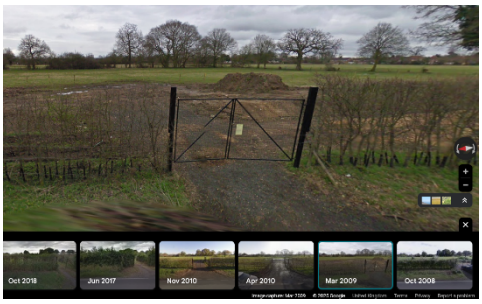
Also, after initially requesting the significant portion of the Hatchgate Ditch tributary (filled-in on the Appellant's Lodge Road site without approval or with the necessary permits 15 years ago), be reinstated – the EA inexplicably backed down during the appeal and withdrew all objections; WBC as LLFA also have inexplicably never enforced reinstatement of that lost flood compensation capacity (which is directly relevant to where increased Lodge Road site pluvial run-off will temporarily drain before it infiltrates and seeps south).

Hence Hurst residents expecting the EA to act in their best interests might be disappointed. This is an organisation that has perhaps lost its way and needs to reset priorities particularly for Hurst. Specifically in 2016, the EA were happy to let Summerleaze increase discharge of cyanide, lead and copper content of Hurst Landfill leachate pumped into Hurst's foul sewer system and decommission the landfill gas engine electrical generator (EPR/BV72221V/V004), but in over 20 years have not yet managed to delete non-existent "Main Rivers" from GOV.UK online data, despite obviously knowing all about their permanent displacement by general waste landfill hills. This lack of appropriate EA action is resulting in a considerable waste of Developers', WBC's, Residents', and Planning Inspectorate's time, valuable time unnecessarily spent producing, reviewing and discussing inappropriate FRAs and unfeasible drainage proposals.

It would be good if the Environment Agency is able to prioritise, advise, and constructively contribute to what is finally decided for privately owned sections of the boundary Hatchgate Ditch tributary, originally putting forward a good idea to reinstate the filled-in section of the ditch. However, the EA needs to stay more focussed, commit to good decisions and see them through! Meanwhile Woking Borough Council Planning must be fully aware of the problems in core documentation for Hurst and be able to advise developers which EA Main Rivers no longer exist to be included as part of a developer's drainage scheme of FRA document.

**APPENDIX (C)(HDDBFN) Hatchgate Ditch Destruction Blocking Flow North:**

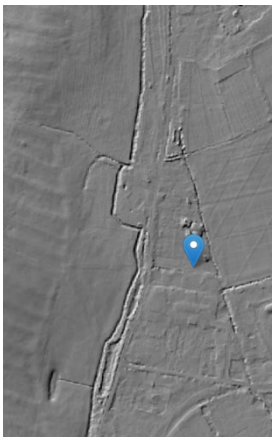
As LLFA and WBC Planning, is WBC able and willing to enforce full reinstatement of the on-site, filled-in, previously open sections of the Hatchgate Ditches on adjacent Application: 242067 plot, to reinstate local "Sawpit area" flood compensation, reduce seasonal Lodge Road fields ponding, and to increase bio-diversity as originally requested by The Environment Agency?




Tuesday, 19 August 2025 day 4 of the Appeal for adjacent plot Lodge Road Application: 242067, during the round table discussion the Inspector asked the Environment Agency witness if she was aware of when the onsite ditch was "culverted"? Of those speaking - the Environment Agency, Appellant's representatives and WBC Planning and Legal - no one provided an answer; the public were not asked.

*WBC Application: 242067 reference for the irrefutable Streetview evidence was provided in Interested Party Planning Inspectorate Appeal representation – receipt confirmed 18/06/2025, see:* Planning Comments Comments_AndrewButler_242067_4584184.pdf App Ref: 242067 Date Received 28/08/2024 Hence the Inspector appears not to have been aware of this information.

Had members of the public present at the round table been asked, or Google Streetview "see more dates" consulted as advised, the Inspector could have found an answer, namely:



Oct 2008: Google Street View shows a blue hatchback car parked in front of the site entrance onto Lodge Road. Beyond the gates, piled up waste or soil heaps can be seen in the vicinity of the onsite ditch, with the trees previously marking the line of this ditch (as seen on the right) having already been removed. The felled trees along the destroyed section of the ditch are shown in place on the Developer's "Planning Statements and Reports", Contamination Report, Part 4, Page 11, on the aerial photograph, capture date 04/09/1999.

Mar 2009: Google Street View shows work well underway to bulldoze the waste/spoil/soil heaps into the ditch, levelling this part of the site, completely blocking drainage flow north and removing many cubic metres of ditch/swale flood compensation capacity.

Apr 2010: Google Street View shows ditch destruction more or less complete, preventing any natural drainage north, and (now unsurprisingly) with standing water visible beyond on the waterlogged field, an associated increased flood risk to neighbours east in Tape Lane, and south in Martineau/Sawpit and beyond.

The LiDAR scan in the screenshot (right) clearly shows the east boundary blocked truncated ditch within Application:242067 site which if reinstated as an open ditch to create storm flood compensation, would help to lower the general risk of high surface water flooding generally in the Sawpit and Lodge Road areas. Why don't WBC just enforce the reinstatement? Perhaps this is enough evidence for WBC Planning to take immediate "deculverting" enforcement action to remove the undersized blocked culvert and have the open Hatchgate Ditch tributary reinstated?

**Would WBC please enforce removal of the blocked culvert that goes nowhere:** During appeal for Application: 242067 there were interminable spurious insane discussions and correspondence between the Appellant, EA and WBC Planning regarding roughness of the culvert pipe, hydrology etc, but with no one discussing the elephant in the room that there is no river into which it can flow; the river has gone as can be seen on the LiDAR scan (above)! During appeal session, among the stream of jaw-droppingly

wrong statements from the Appellant's "expert witnesses" with no detailed knowledge of Hurst, KC Mr John Litton claimed to have "CCTV for the length of the culvert on site going under and beyond Lodge Road with water flowing through it." This was of course a lie that went unchallenged in the appeal session by WBC's Mr Lewin and Mr Croucher, and presumably to avoid discussion of this issue in appeal session in front of the Inspector, the appellant made a late, late document submission under the radar which confirmed there was no such video. The survey report showed the video had been abandoned at least 30 metres short of Lodge Road noting 15% blockage some time before the camera apparently turned over and videoing was abandoned.

It is suspected that after 15 years of heavy Hurst rain dump flushing debris into this this culvert with no outlet, that it is thoroughly blocked, should be dug up and the original open ditch reinstated as the Environment Agency originally requested.

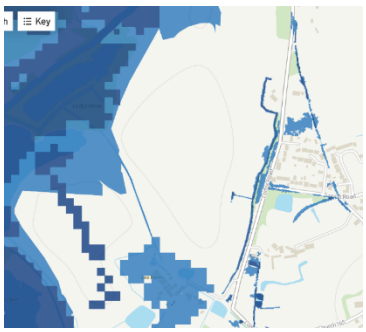
**There is no River!** Whether it is called the Hatchgate Ditch or Whistley Green Ditch there is no river running north on the west side of Lodge Road, replaced by 2 million tons of landfill waste covering 50ha but no river. In objections to Application: 242067 a site visit route was suggested to confirm the non-existence of the Hatchgate Ditch running north beyond Old Lodge and the Summerleaze site entrance on Lodge Road, see: Documents for reference 242067, Planning comments Comments – A A Butler -242069 11/09/2024 (page 73)

Residents have commented that the Hatchgate Ditch is blocked or does not function properly; it simply is not there anymore and in Whistley Green is built on. When will developers, Planning Inspectors, Wokingham Borough Council Planning Development and Control recognise west of Application: 252934 site, major man-made topographical changes have created a pluvial surface water trapment triangle within central Hurst. With natural higher land of Haines Hill to the east, Ashridge/M4/A329M to the south, and with new man-made raised land and water levels of both Dinton Pastures and Hurst waste landfill, built-up close to the Lodge Road site west of B3030, displacing original Loddon floodplain, a roughly triangular pluvial containment area has been created with these topographical changes now blocking all previous drains north and west. There are no rivers for onward surface water drainage north and west of the Lodge road site. Why is this never discussed or raised at Planning Appeals?

**APPENDIX (D)(FZGE) GOV.UK Flood Zone Map Glitches and Errors to be Reviewed and Improved:**

**While providing useful guidance, GOV.UK Flood Risk for Planning maps for Flood Zones currently display obvious glitches and serious errors in detail for Hurst and must be used with care:**

In the photo (right) the sheen of the previous day's rain can be seen still running off the landfill hill towards Hurst into the Hurst Landfill perimeter ditch north of "Old Lodge". This significant ditch and conduit for zone 3 fluvial flood risk pictured is not shown north of "Old Lodge" on the current GOV.UK map (screenshot below left). Surely knowing of this error and its proximity to the Lodge Road sites, the onus should be on WBC Planning or as LLFA to advise the Applicant of the omission together with its additional flood risk and contamination implications for properties built alongside Lodge Road?




Also in the current GOV.UK/EA/OS Flood Map for Planning photoshot (left) is the absurd designation on the top of the nearby 44m AOD western landfill hill, 7m higher than Application: 252934 37m AOD site, as Flood Zone 3. With two such very obvious errors within only a small area of Hurst should not WBC as LLFA be advising this online data for Hurst should carry a suitable warning *"GOV.UK responses may include errors"*?

If the Applicant insists that useful but suspect GOV.UK data should take precedence above what actually exists, and actual Interested Parties "Proof of Evidence" of actual recent flooding, then the Environment Agency statement included in Applicant's "FRA Appendix 5, EA Flood Map for Planning" (screenshot below) should take precedence, and hopefully WBC Planning will refuse the application on the basis the high risk flood zone 3 designation is almost certainly correct for the 37mAOD site and is not the place to build in Hurst.

Environment Agency

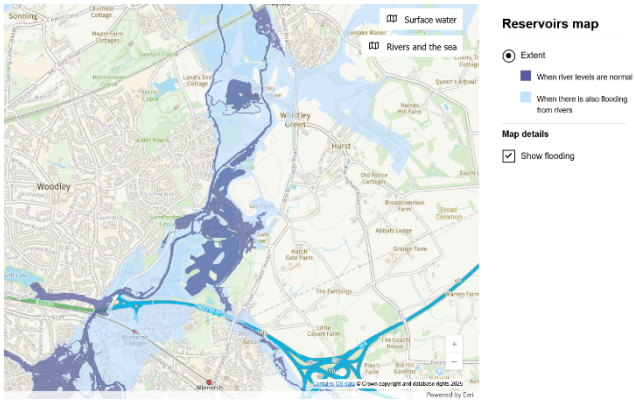
# Flood map for planning

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

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

**APPENDIX(E)(BSLRFR) Black Swan Lake Reservoir Flood Risk and procedural irregularities:**

Application: 252934 FRA and FLOODING SEQUENTIAL TEST AND EXCEPTION TEST documents make no mention of the official GOV.UK/EA reservoir flood risk from Dinton Pasture's embanked Black Swan Reservoir, with "wet day" flood extent potentially impacting low lying western areas of Hurst from Lea Farm and Whistley Green directions. With Hurst Landfill perimeter ditch very close to the site and acting as a conduit for flooding, this probably low but significant flood risk must be considered in the FRA. Earth embankments can be subject to failure, recent examples being on the Shropshire and Basingstoke canals, also the possible risk of mindless vandalism or failure of the level-raising stop-log weir cannot be ruled out.




The Applicant's hope to conceal Hurst's BSL reservoir flood risk is normal. Usually, as is the case with this Application: 252934, reservoir flood risk is simply not considered by not mentioning it or stating the risk is "low". Alternatively, Applicants have tried to deceive WBC and Hurst residents by patronizingly submitting a reservoir flood map for a random irrelevant area. Recently this has been the case with FRAs for both Application: 240583, and Application: 242067. The "Hogmoor" Applicant submitting a random map of somewhere in Esher Surrey, and the Applicant for the neighbouring Lodge Road plot Application: 242067 submitting a random map of somewhere in Radlett Herts. Hence this initial attempt to conceal relevant flood risk information or mislead regarding reservoirs appears to be standard practice but is surely a risk which should be properly considered for the Flooding Sequential Test and Exception Test?

The Applicant's submitted "FLOODING SEQUENTIAL TEST AND EXCEPTION TEST, APPENDIX 1" document is Application: 242067 Appeal Decision 10th Nov 2025, possibly to help support their case to ignore the sequential test? Although the Inspector's overall decision to refuse the appeal was correct and welcome and logically should also apply to Application: 252934, it appears from his statements the Inspector remained misinformed on many legitimate aspects of flood risk in Hurst, particularly those raised by Interested Parties, and gave undue weight to the Applicant's biased and wrong "Expert Witness" statements. Applicant's late document submissions made post agreed submission date with no chance for Interested Party challenge, were still accepted by WBC Planning and posted very promptly 12/09/2025 on WBC's Planning Application: 242067 "View Plans & Documents" website. These late Applicant's submissions generally rubbished and claimed "Factual Error" regarding Hurst residents' truthful Interested Party submissions. The Interested Party comments were made in good time before the end of August 2025 as agreed with the Inspector but remained **not posted** on WBC Planning's normal Application: 242067 "View Plans & Documents" website for public view for the duration of the Appeal; why was access to these truthful important responses made more difficult and effectively suppressed by WBC?

Subsequently at the "Flooding Round Table Discussions" 22/09/2025 the inspector honestly admitted that he had not read the relevant earlier "unposted" Interested Party documents to which the Applicant's "posted" documents referred, and which WBC Planning had still not then posted on the Planning 242067 "View Plans & Documents" website. The Interested Party comments were eventually posted with Application: 242067 documents 14/10/2025; five days after the Initial Inspector's decision had been made 09/10/2025! The Inspector's Decision for Application: 242067 was reissued on 10/11/2025 to correct an incorrect "CD" reference which had been given to the contentious but correct Interested Party comments.

Whether this disregard for all procedures happened deliberately or accidentally, this preferential handling and treatment of the Applicant's biased and often factually incorrect viewpoint and effective suppression of valid Interested Party comments by WBC Planning must never happen again. Hence there are tens or hundreds of incorrect and spurious late-submission statements made by the Application: 242067 Applicant

where the Planning Inspector may have been misled, and where Interested Parties were given no chance to respond. Just one relevant example relating to Black Swan Lake reservoir flood risk follows and is relevant because in the paper trail Application: 252934 Applicant is trying to use such erroneous statements to support their case to ignore the Flooding Sequential Test, and because the Lodge Road sites look likely to be subject to aggravated “wet day” reservoir flooding and should be properly informed regarding Black Swan Lake:

Ref: Application: 242067 “View Plans & Documents” Page 34 “Flood Risk and Drainage Supplemental PoE Ian Walton_Rev01”. The Applicant’s “Expert Witness” Mr Ian Walton states: “Factual Error 3.8 The Black Swan Lake is not recognised as a raised embankment reservoir and appears to be a flooded former mineral working.” This statement made in response to an Interested Party comment submitted 24 August 2025 but only posted with the planning application documents by WBC Planning on 14 October 2025.

The first “Proof of Evidence” to prove that it is “expert” Mr Walton’s false “PoE” which is wrong is a screenshot (below) of WBC’s own core document Table 5-4 which gives “Dam Type” as “TE Earthfill”. This applies to the embankment of around 2m in height which surrounds most of Black Swan Lake, most obvious on the east side above the level of the Emm Brook and to the north. Surface area is given as 260,000 m2 which on the 6 ¼” O/S map looks more like 275,000 m2 water surface area (ie: excluding islands)

Table 5-4: Reservoirs within Wokingham Borough. The locations of these reservoirs are shown in Figure 5-4.

| Reservoir | Easting and Northing | Reservoir owner | Physical Status | Risk Category | Category | Year built | Surface Area (m²) | Dam Type |
|---|---|---|---|---|---|---|---|---|
| Bearwood Lake | 477284, 168602 | Reading Football Club Ltd | In operation | B | Impounding | 1860 | 190,000 | TE Earthfill |
| Black Swan Lake, Dinton Pastures | 478074, 172285 | Wokingham Borough Council | In operation | Unknown | Impounding | 1979 | 260,000 | TE Earthfill |
| Longmoor | 478538, | Wokingha | In | C | Impoundin | 1800 | 40,000 | TE Earthfill |

Looking at an earlier WBC core document screenshot (right) the maxim height of the **dam** is given as 2m. Hence if the dam is 2m and the lake has a surface area of 260,000 m2, should the Capacity not be more that the 200,000 m3 stated? Perhaps something more like 300,000 m3.

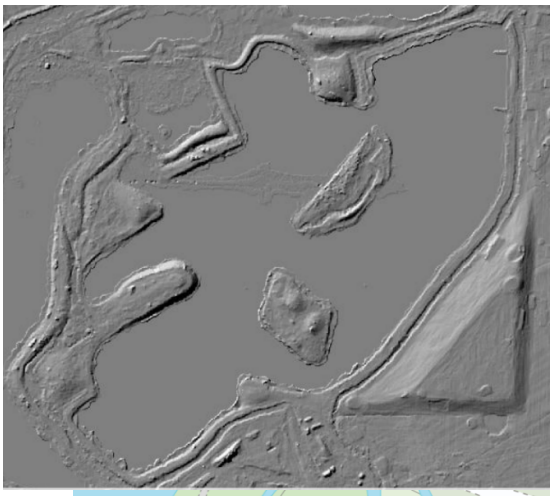
**Suggest WBC as LLFA review the normal Capacity of Black Swan Lake and what figure has been used by the Environment Agency to assess “wet day” reservoir flood risk.**

*Table 4-1: Reservoirs within Wokingham Borough*

| Reservoir Name | Bearwood Lake | Black Swan Lake Dinton Pasture | Long La |
|---|---|---|---|
| Physical Status | In Operation | In Operation | In Op |
| Situation | Near Wokingham | Near Wokingham | N Woki |
| NGR | SU7730068600 | SU7810072300 | SU785 |
| Risk Category | B | Unknown | |
| Undertaker Name | The Royal Merchant Navy School Foundation | Wokingham Borough Council | Woki Bor Co |
| Category | Impounding | Impounding | Impo |
| Year Built | 1860 | 1979 | 18 |
| Surface Area (m²) | 190,000 | 260,000 | 40 |
| Dam Type | TE Earthfill | TE Earthfill | TE E |
| Maximum Height of dam (m) | 6 | 2 | |
| Capacity (m³) | 314,000 | 200,000 | 70 |

Photos left show the 2m high “TE Earthfill” east reservoir embankment with perimeter path on top surrounding Black Swan Lake holding the lake’s water level above the River Loddon and Emm Brook. (Top left) near the Activity Centre looking south, and (bottom left) at the “doggy” paddling pool south of the Activity Centre where the wooden reinforcement is a metre high with the embankment rising another metre to the path with the higher lake beyond.

The LiDAR screenshot (right) shows embankment, together with raised landscaping features, completely surround Black Swan Lake with the stop-log level-raising weir and and overflow at the northeast of the lake 1km from the proposed Lodge Road site.



The stop-log weir to the northeast of Black Swan lake is shown on GOV.UK Flood Maps for Planning and on Ordnance Survey master maps as “Sluice”. This weir or **dam** (as referred to in WBC core data is not shown or annotated on normal OS Maps. There is no indication on GOV.UK or OS maps of the raised level and embanked nature of Black Swan Lake or that it is stored water that can be released.

The photos of the weir show that it comprises removeable stop-logs, held in steel slots in concrete pillars with steel sheet piling running into the surrounding earth/gravel embankment.

The 13 Sept 2025 photo to the left shows the lake during dry conditions at the lowest level ever with duckweed in the outflow, and (right) still above the level of a flooding River Loddon.


There is no “sluicing” or significant flow going on here, the stop-log weir is acting as a dam raising the level of Black Swan Lake and should surely be shown as a “weir” on normal OS maps where it is not shown at all.

In summary, Black Swan Lake is definitely recognised as a raised embankment EA reservoir within Wokingham Borough and is a much loved and appreciated amenity. However the raised landscaping and embankment of this reservoir has displaced River Loddon floodplain and now helps to retain pluvial flooding to the east within Hurst as well as being a stored water flooding risk.

It is not merely "a flooded former mineral working" to be ignored by an Applicant who does not want to include it in their FRA as a potential Flood Risk. It is disappointing that WBC's Mr Lewin and Mr Croucher said absolutely nothing as LLFA to challenge this and many other wrong statements relating to flood risk made on behalf of the Applicant by their KC and Expert Witnesses at the recent Application: 242067 Lodge Road Appeal.

**Application: 252934 needs to include Black Swan Lake flood risk with the lake dam only 1km from site and a low connecting flow path via Sandford, Lea Farm and Hurst Landfill perimeter ditch conduit.**

At recent Application: 242067 Lodge Road Appeal Round Table Discussion on Flooding 22/09/2025, other than WBC Planning's Mr Croucher's laudable stiff defence of the Council's decision regarding the Flooding Sequential Test essentially based only on fluvial considerations, the lack of any discussion of Hurst's actual pluvial and sewer surcharging flooding issues, the lack of any challenge to the Appellant's KC's and Expert Witness' wrong "PoE" statements and not a single technical questions to test the expert witness' actual expertise from WBC Planning and legal team, and the apparent lack of any WBC representation or expert input as LLFA was both very frustrating, disappointing, and astonishing to witness. This situation where an Applicant's late, unchallenged, inaccurate, misleading "PoE" submissions were promptly posted by WBC and still remain unchallenged on Application: 242067 Documents file, while Hurst Residents' truthful comments submitted in time were not posted by WBC on the normal Application Document file until 5 days after Appeal decision, demonstrates an absolutely disgraceful disregard both for following agreed and reasonable procedures and active suppression of Hurst residents' views and comments.

**APPENDIX (F)(UOSMH) Update Ordnance Survey Map for Hurst:**

**Including issues restricting The Hatchgate Ditch flow to the south:**

(OS supports GOV.UK info) The normal OS maps for Hurst available to the public are quite misleading regarding lack of annotation of major man-made topography changes to Hurst's River Loddon floodplain and incomplete and random annotation of Hurst's currently active surface water drainage ditches south and east of Church Hill draining C2: Hurst River Terrace and I4: Hurst Farmed Clay lowland.

Raised man-made features now displacing most of Hurst's original River Loddon floodplain, B1 (Loddon River Valley With Open Water), and now trapping surface water within Hurst village and not shown are: Whistley Park not marked as "Landfill" site, no appropriate 40m contours for 3 general waste hills, also Dinton's gravel-waste golf course hill not shown. The surrounding embankment of Black Swan Lake EA reservoir stored water, raising lake level above the adjacent Emm Brook and River Loddon level (quite clear on LiDAR map), is not shown or annotated with hatching - whereas some raised landscape features are. The level raising stop-log dam/weir is not shown or annotated (but shown and annotated as "sluice" on both OS master maps GOV.UK flood maps).

Annotated just below "Black Bridge", the important "Weir" (screenshot left) in the east (Hurst) bank of the Loddon is shown (but not annotated on GOV.UK flood maps see screenshot right). This preferentially dumps higher River Loddon levels towards Hurst into the de-facto Flood Zone 3b water storage area of Sandford Lane/Lavell's Lake, a preferential flood water storage area indicated by the OS wading bird "Nature reserve" (not "cross-hatched" EA "stored water").


The "Sandford Gap" conduit via Lea Farm and the Summerleaze landfill perimeter ditch exposes central Hurst to a preferential Loddon fluvial flooding - the perimeter ditch, or leachate/run-off/contamination segregation ditch, the only significant water feature now remaining in Whistley Park, is not shown (partially shown on GOV.UK flood maps).

West of Lodge Road non-existent Whistley Park EA Main Rivers are correctly not shown by OS (in contrast to the wrong online GOV.UK data). East of Lodge Road the now non-existent onsite filled-in and blocked north section of the main Hatchgate Ditch tributary is wrongly still shown as open active ditch.

Ordnance Survey have been contacted with a view to correct misleading aspects of the OS map. This has resulted in a reported OS surveyor site visit to Lodge Road lasting two days, with me being advised 19/12/2025: "These updates will be in the January release of MasterMap, available to customers 05/01/2026". However, without access to OS master mapping, the OS Map a normal member of the public can purchase online remains unchanged and misleading.

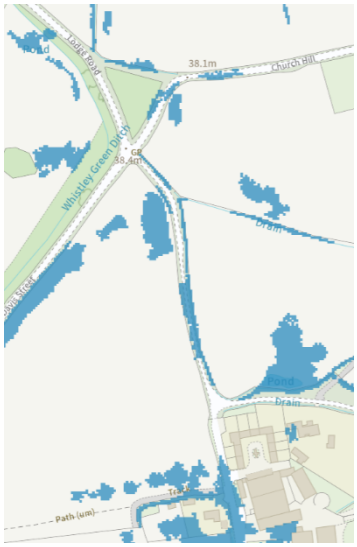

Do WBC Planning have access to OS master maps, or had any contact with OS to verify any updates? Are the Council able to add weight to Hurst residents' efforts to get this normally-trusted-but-wrong core document to properly show the man-made topographical situation to the west of Hurst seriously affecting surface water drainage, and actual current pluvial drainage routes south of Church Hill to the Twyford Brook?

GOV.UK data utilizes OS data and the screenshot towards the south of Lodge Road (right), already highlighted in **(1.1.3)** is annotated "Issues" on the GOV.UK Flood Maps. What these issues are is not known but are likely to include the following:

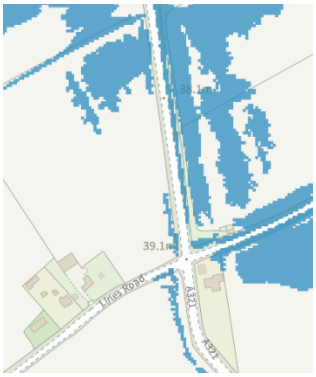
- No ditches draining south or north either side of Lodge Road.
- To the west, very close proximity to the adjacent Waste Landfill perimeter ditch shown as GOV.UK Zone Flood Zone (3) and (2) risk with the added pollution risk of leachate and dissolved gas contamination.

- Close to Landfill gas vents/ sampling points.
- No active culverts under Lodge Road although damaged remains of headwalls can be found.

All surface water drainage from the Sawpit and Lodge Road area and Wiilowmead Fields will have to pass across this area before draining anticlockwise around Church Hill towards Keyers Bridge. From the soggy area south of Church Hill neither the GOV.UK Flood Maps or Ordnance Survey Maps show active ditches draining towards Keyers Bridge correctly or at all. For instance, all that is left of the active flowing Hatchgate Ditch to the west side of Lines Road is pictured in the photo (right) with a strong flow south directly towards Hatch Gate Farm, as indicated by the stick and ribbon. Lots of maps wrongly show this flow north. February and March are perhaps a good time for WBC as LLFA to survey what is happening in these ditches. There are simply no ditches shown along Lines Road on the 6 ¼" OS Map. In the GOV.UK Flood Map screenshot (left) the active ditch pictured is not shown at all but the stagnant "swale" ditch on the opposite side of Lines Road is shown.




At the opposite end of Lines road joining A321 things are not much different with a turbulent active flow heading east on the south side then crossing on the surface to join the A321 ditch towards Keyers Bridge and "S-19" flooding. Again, this active ditch is not shown on official maps OS or GOV.UK Flood Maps.




Are WBC Planning able to help get these crucial core documents reviewed and improved and updated for Hurst?