

Planning Application: 253074: Land adjacent to School Road and Orchard Road, Hurst (Willowmead Fields) Application for Approval of Reserved Matters

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I strongly object to Planning Application 253074 which will result in significant increased flooding harm to neighbours, create avoidable traffic hazards and congestion, and spoil Hurst village amenity value. I do hope Planning Application 253074 is refused by Wokingham Borough Council for many reasons, including those involving drainage described in detail below:

(1.0) Condition 97: Appeal Ref: APP/X0360/W/24/3342812 Appeal Decision Conditions para (97) states:

“In the interests of adequate drainage, a drainage scheme should be submitted with or before reserved matters”

It would be reasonable to assume Inspector Mr JP Sargent intended the Applicant to submit a feasible scheme, acceptable to both Wokingham Borough Council Planning, Wokingham Borough Council as LLFA, Thames Water and existing Hurst residents.

Hence it is expected that a proposed Willowmead fields drainage scheme must properly address the actual flooding experience and concerns of Hurst's residents, who are directly and increasingly affected by seasonal pluvial flooding and sewer overloading problems.

Recognising Hurst village's unusual and concerning man-made pluvial flood risk situation, just like the developer's obviously unfeasible infiltration proposals initially made and approved by WBC for the "Sawpit" development, similarly impractical infiltration site drainage proposals submitted by the Applicant for Willowmead fields are inadequate and unacceptable. It is hoped Wokingham Borough Council Planning will promptly reject key Applicant's documents for drainage infiltration design basis, namely:

Applicant's Drainage Statement 16/12/2025

Applicant's Infiltration Test Report 16/12/2025

In summary, these documents are a waste of everyone's time (Applicant, WBC Planning and Hurst residents). With infiltration tests carried out in dry summer conditions, and with further manipulation of the data for these already unrepresentative dry summer results, making them even more unrealistic – these documents provide no sound or sane basis for approval of an acceptable drainage system designed to handle the certain substantial increase in surface water run-off from this site caused by, and to be expected from, the proposed high-density development – some specific details follow in (2.1) and (2.2):

(2.1) Summer timing of the infiltration tests is inappropriate. To be valid and representative infiltration tests in Hurst must be carried out in February/March: The Willowmead fields infiltration tests are reported as starting 21st May 2025 completed 22nd May 2025. This timing followed a period of particularly sunny, fine, generally dry weather in Hurst starting in early April 2025, through into May 2025. At best, the test pits and infiltration results reported will be an unrepresentative best case "Summer Conditions" (approaching Hurst Show time).

The worst nuisance pluvial flooding within Hurst is typically experienced in late winter and early spring.



The photo on the left of a car ploughing through deep pluvial flooding at the bottom of Church Hill was taken 24/02/2025 at the “W” junction with Lodge Road/ Davis Street/ Lines Road – in what Thames Water have stated has been the driest spring for 69 years.

Subsequently from 01/03/2025 School Hill was completely closed to traffic due to the depth of this surface water flooding. This is not a one-off or rare event; it was similarly closed due to flooding in 2024.

It is at the time of year pictured, late February/ early March when the worst of Hurst’s seasonal surface water flooding is

usually experienced. Hence for the infiltration tests to be realistic and valid as design basis for Winter/ Spring site drainage the Applicant should repeat Willowmead fields infiltration tests in late February and March. Any other timing will not be credible and will be unacceptable and unrepresentative as the basis for meaningful infiltration calculations applying to site drainage through the whole year; irrelevant and not applicable for winter/spring conditions.

Hence to provide credible, accurate and properly representative Willowmead development drainage system design information, would Wokingham Borough Council Planning please request the Applicant to repeat and use more realistic and representative Willowmead fields infiltration tests completed in late February and March.



The photo left taken 1 April 2023 shows the true nature of Willowmead fields typically waterlogged in Winter/ Spring, The sometimes-flooded lower central patch of circa 38.50m AOD land in front of Willowmead fence seen acting as an effective swale. If it could be seen, the Applicant’s infiltration test pit “INFL4” would be somewhere in the middle of the pond. Clearly to dig test pit INFL4 under the conditions photographed would be pointless as the test pit would be flooded and any infiltration test impossible to carry out. By simple inspection of Hurst residents’ seasonal photographs, and as with the “Sawpit” site, common sense dictates infiltration drainage solutions are just not

practical for these seasonally waterlogged fields.

The photograph above was taken from the School Road site boundary looking east, with the flooding not only covering the site of test pit INFL4 but also the proposed site of CAR PARK 3, including parking spaces 18,19,20,21,21 etc. When this area is raised, paved over and the permeable paving becomes quickly blocked with road silt, leaves, moss and lichen, this currently stored pluvial surface water will end up immediately flooding School Road down towards the Village Halls and Sawpit (as indicated by blue arrows in the Applicant’s [\(APPENDIX E FLOOD EXCEEDANCE ROUTE\)](#) and perhaps more importantly, and not shown by the Applicant, flow directly opposite straight over the road from the proposed School Road car park across to the lower side of School Road and into Tape Lane.

(2.2) Unacceptable selective use of infiltration data: Inappropriate timing of infiltration tests is an obvious problem, what is not so obvious is the Applicant's further manipulation of test results to make them even more unrepresentative, namely:

View northeast to INFL1A top, view to east bottom

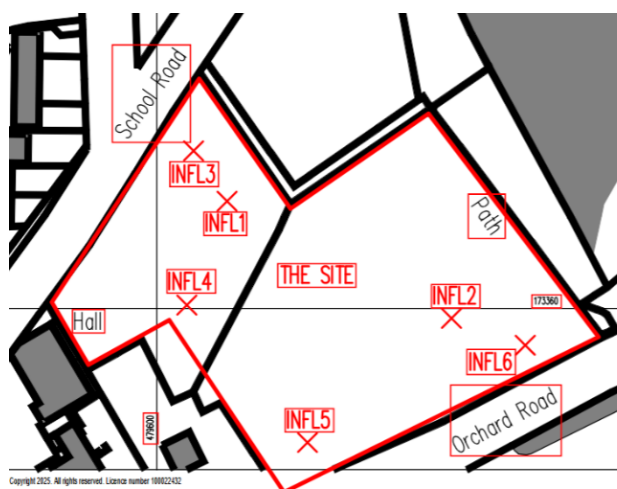


The photo to the left is the Applicant's own photo of the site taken from the School Road direction, orientated similarly to the photo showing 1st April 2023 flooding. Except this Applicant's photo was taken in drier Summer conditions, with the trees in full leaf, and with the Willowmead fields overgrown and ungrazed (before weedkiller application).

The same Applicant's photo appears in both the **Drainage Report** and **Infiltration Test Report** documents but with slightly different titles, the other

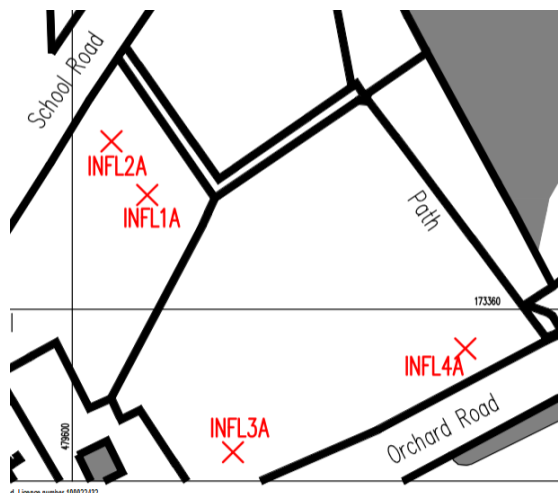
identical photo annotated "View northeast to INFL1 top, view east to INFL2 bottom". The change in titles and test pit nomenclature is a clue to data manipulation which is due to either a lack of care, or due to what might be interpreted by some as a deliberate attempt to confuse and knowingly deceive to falsely gain approval for an unrealistic scheme which from local experience is certain to cause serious future flooding harm to many near, and not-so-near, Hurst residents.

The Applicant's infiltration test pit locations are detailed on two screenshot maps below:



Infiltration Test Report (left)

Drainage Statement (right)



Comparing locations of the infiltration test pits in the two documents, the Infiltration Test Report photo description of the view from School Road "east to INFL2 bottom" is correct, but INFL2 is then not referenced in the Drainage Report.

Test pit INFL4, located near the north corner of Willowmead's garden fence and in the lower flooded area at 38.50m AOD, had relatively poor infiltration results - and has been deleted in the Drainage Statement, viz: **INFL4 0.3m DipmBGL to 0.6m in 2400 (mins)** – taking perhaps 40 hours to soak away a foot of water?

Test pit INFL6 at 39.50m AOD, at a huge elevation difference for Hurst (1m higher than test pit INFL4), consequently provided much better infiltration results, viz: **0.35m DipmBGL to 07m in 900 (mins)** taking only 15 hours to soak away more than a foot of water. This test pit has been renamed INFL4A – making it look a bit like INFL4; why not use INFL6A – when INFL1 has logically become INFL1A etc? At best this erratic change in nomenclature is just confusing.

Using only selective and unrepresentative preferential infiltration results from test pits located at higher, drier parts of the Willowmead fields for overall theoretical drainage infiltration and run-off calculations,

would be very wrong. To properly meet PI Condition (97), such unrealistic predictions must never be used to justify a feasible and practical infiltration drainage scheme for the Applicant's dense proposed development on waterlogged fields which flood. It is hoped WBC as LLFA and WBC Planning will ensure realistic data is used by the Applicant for any future calculations for surface water absorption and run-off.

(3.0) The Applicant must submit much more comprehensive sewage handling information for WBC and Interested Party review, and be able to demonstrate that the proposals have Thames Water approval:

(3.1) applicant has submitted insufficient relevant or accurate foul sewer information to allow informed WBC approval: With just one sewer map submitted, the Applicant states:

"There are public foul sewers in Church Road. There are no public surface water sewers."

"3.2.1 Foul drainage from the buildings will be collected via pipes and will be discharged to public foul sewer in Church Road."

In Applicant's submitted documents, the proposed development's foul sewer is shown connected to Thames Water 150mm (6") School Road (south) sewer running southwest to TW Sawpit Road (Hurst) SPS SAWPP1ZZ pumping station. Also draining by gravity to the same School Road 150mm sewer, existing properties most at risk, should sewage capacity prove restricted by addition of the extra Willowmead fields development sewage, include those in School Road south of Braybrook Drive, properties in Tape Lane south of Barker Court, and east Martineau properties - all discharging to Sawpit Pumping station via the same School Road sewer pipe running near the Village Halls. Other properties discharging to and handled by Sawpit pumping station are on School Hill, Orchard Road, and in the vulnerable lower arm of Hurst' "Reversed C" village development in Little Acre (built over the sewer), Martineau Lane, Barber Close, Sawpit Road, Lodge road and Nursery Close.

The existing Sawpit Road pumping station and 100mm rising foul main crosses under Lodge Road fields to Manhole 2801 in Lodge Road, where it pumps into the main 225mm (9") Hurst sewer system (as does pumped landfill leachate via the Summerleaze bio-solids pipe). Hopefully before WBC approval, Interested Parties will be able to see a Thames Water's response to the Applicant's proposal. Rather than simple unsubstantiated TW assurances, perhaps WBC should be requesting specific information from Thames Water such as Sawpit sewage flow/head pump capacity and 100mm (4") rising main capacity to handle the proposed additional Willowmead fields load? Also, the existing sewage peak load, expected additional peak load from Willowmead fields development, and any pumping station sewage ullage available in the event of electrical power or mechanical failure, and how long before sewage backs-up into the lowest properties most at risk before and after Willowmead fields development?

Perhaps similar capacity and spare capacity information for all Hurst's sewage is required for the already sometimes overloaded Thames Water Broad Hinton facility?

Rather than just blame Thames Water for any future problems and hold them responsible for future infrastructure improvements, it would be prudent to check and plan for future problems now before any building takes place.

Interested Party suggestion: Being so close to the Willowmead fields site, Thames Water might suggest for instance that the Orchard Road (west) 150mm sewer, at present handling sewage from only few properties, would be a much better Willowmeads fields connection point with much less likelihood of backing-up sewage discharge from existing upstream School Road properties, especially during peak sewage flows.

(3.2) The Applicant appears ignorant of Hurst's surface water sewers and will need Thames Water's permission for their flood exceedance proposal to School Road surface sewers:

The Applicant has incorrectly assumed there are no public surface water sewers. There are surface water sewers, the road drain (photo right) is in School Road immediately outside the Village Halls. The photo was taken to show how agricultural activity involving large tractors and trailers can regularly block Hurst's surface sewers in summer as well as the normal blockage with leaves in Autumn/Winter. The expected surface water run-off from the Willowmead fields site shown in the applicant's **Appendix E FLOOD EXCEEDANCE PLAN** will either flow over and into this road drain, left to right, or help block it with "agricultural trailer" debris.



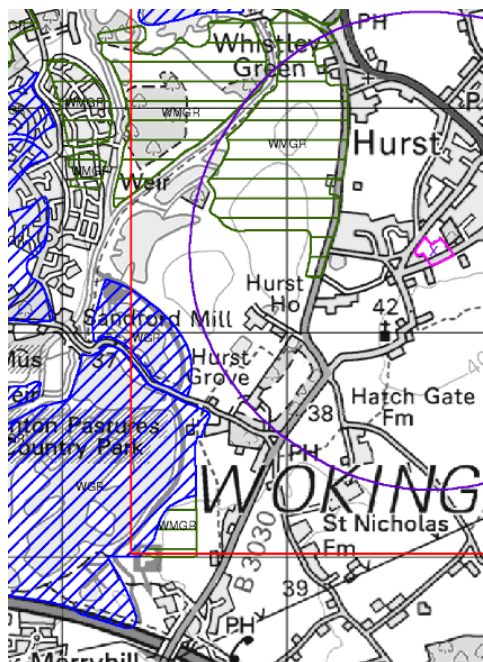
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Thames Water and WBC must be consulted on the Applicant's proposals to utilize School Road's surface water sewer, and Interested Parties need to see a satisfactory TW and WBC response before WBC approval is given for a proposed drainage scheme. It is also clear from this oversight and from the applicant's lack of attention to using accurate street and school names, the Applicant has spent little or no time in Hurst to actually look at, properly survey, and properly assess the site location in context with its surroundings.

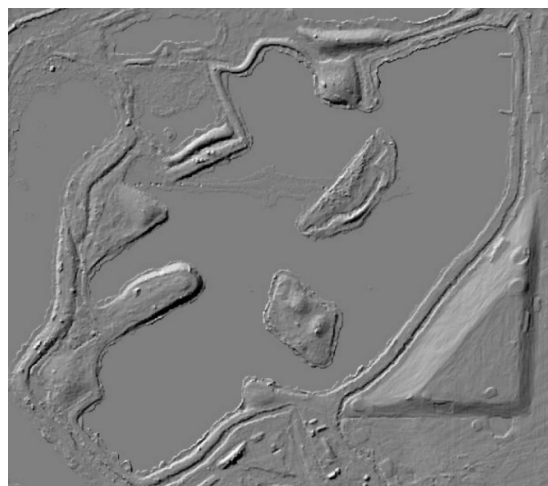
(3.3) Have Thames Water confirmed drinking water can be supplied? Thames Water's water supply response 3/09/2024 for App 242067 (99 dwellings Lodge Road) was – *"Following initial investigations, Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal."*. Are WBC Planning able to confirm Thames Water has responded to the Applicant agreeing the existing water supply/infrastructure has sufficient capacity to supply the new dwellings without adversely affecting supplies to existing residents?

(4.0) Incorrect, official-looking, core drainage design information submitted by the Applicant must either be properly corrected and resubmitted before being used to support any design basis for surface water drainage within Hurst, or removed from the Application:

Unfortunately, use of wrong core drainage information for Hurst for planning applications is a major and troublesome issue which applies most seriously to core information provided by normally respected Government agencies. This information one would normally expect to be correct, but is not correct, it particularly affects just about all documents describing Hurst's **B1: Loddon River Valley With Open Water**. Such an unacceptable official-looking design document has been submitted by the Applicant within the Infiltration Test Report which, unless it is corrected, should be withdrawn – see screenshot left:



This **Landmark map Page 2 of 5** is meant to indicate those areas where the ground surface has been significantly modified by human activity – which Wokingham Borough Council Planning knows all about and at some time must have approved. A main reason for the current pluvial flooding problems within Hurst is the 2 million tonnes of general waste deposited over 50ha of Hurst's River Loddon floodplain west of Lodge Road. These landfill hills now block all surface water drainage west and north directly to the River Loddon from **C2: Hurst Terrace**. These capped waste landfill hills now cover and block EA

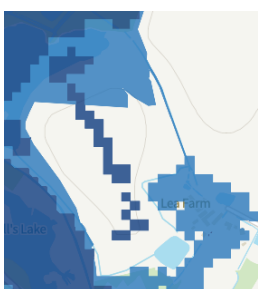


Main Rivers (or drainage ditches) that previously existed in this area. Unlike the current misleading Ordnance Survey map, the Landmark map does correctly show the 40m contours of the three distinct landfill hills northwest of Hurst Hill. But inconsistently, the waste hills with their gas collection system and perimeter leachate segregation ditch, are not marked as “ground surface significantly modified by human activity”. Similarly, west of Davis Street, the raised level of Dinton’s embanked Black Swan Lake reservoir/stored water above Flood Zone 3 level, and the surrounding raised landscaping replacing and displacing original floodplain, is clearly marked in blue hatching but not the man-made, gravel-waste, and distinctive triangular old golf course hill, which shows up clearly on LiDAR (right above) – a man-made raised feature that again now helps to trap increased redirected surface water run-off and pluvial flooding within Hurst village.

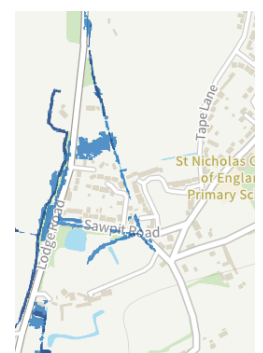
Hence, unless this document allegedly highlighting the bigger picture regarding man-made topographical change around the proposed site is corrected, it serves absolutely no useful purpose and should be retracted by the Applicant. It simply contributes to misunderstanding and misleading statements such as in the Applicant’s [Drainage Statement, Drainage Strategy Report, 2.0](#) “[The nearest watercourse is the River Loddon...](#)”. Correct as the crow might fly but not in terms of ground level where water flows to the lowest point. With waste-contaminated man-made features now blocking any direct flow west, Willowmead fields run-off surface water will tortuously seep and drain south into Hurst’s still active “EA Main Rivers” beyond Church Hill. First alongside Lines Road towards Hatch Gate Farm and across towards Keyers Bridge, then beyond A321 in the Broadcommon ditches, and on into Twyford Brook and only then discharged to the River Loddon and River Thames.

In the Applicant’s contractor’s defence, working remotely, and clearly not having the benefit of local knowledge, official Government agency information is utilized. Unfortunately, it has become apparent that especially for Hurst, what should be accurate topographical and flooding information available online from respected Government agency sources is at best suspect, and often completely wrong and out of date. Unless advised otherwise by WBC Planning these incorrect or misleading documents will be inappropriately used wasting a lot of everyone’s time. Potentially very misleading government agency core documents include the following:

(4.1) GOV.UK Flood Maps for Planning for Flood Zones: this online data should only be used as a guide and not taken as gospel – these maps displaying obvious, easily-checked errors in only a small area of Hurst, makes one wonder what other hidden more complex programming bugs or data input errors exist which are not so obvious, namely:



On the left the GOV.UK map shows an impossible strip of maximum Flood Zone 3 risk on top of Hurst’s western waste landfill hill – several metres above actual Zone 3 flood level. On the right the landfill perimeter ditch is wrongly shown ending and is not shown at all north of Old Lodge/Summerleaze Lodge Road site entrance. This new ditch running north close to Lodge Road, provides a conduit for zone 2 and 3 flooding into central low-lying Hurst for both preferential Zone 3b River Loddon fluvial

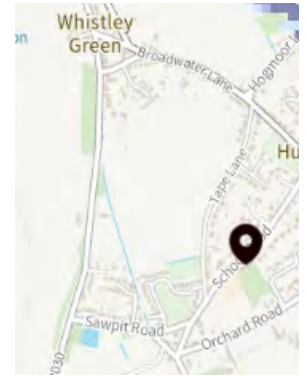


flooding, increased “capped” landfill surface water running east towards Hurst, and Black Swan Lake “Wet Day” reservoir flood risk. The full extent of the ditch should be shown; why is it missing and when will these obvious errors be sorted out? Meantime WBC should not rely on this information for Hurst flood risk assessments or recommend its use to others. In para (64) of the Willowmead Appeal Decision, the Inspector has abdicated responsibility by stating “[I was told though that the site is in Flood Zone 1](#)” – placing responsibility on Wokingham Borough Council’s word that the Willowmead site floods once in a thousand years! Who will be legally responsible for an incorrect decision causing significant increased flooding harm - bearing in mind GOV.UK Flood Zone data is now known by WBC Planning to have easily-checked flaws?

Also, unlike the fluvial flood zone map, the GOV.UK surface water data does in fact show the existence of the Hurst Landfill segregation ditch north of Old Lodge/Summerleaze site entrance. These errors and discrepancies, highlighting not only the presence of errors within maps but between GOV.UK flood maps, surely point to a need to base any credible Willowmead fields drainage proposals on actual site survey

information and Hurst's actual recent flooding history; information first checked and verified by WBC acting as responsible LLFA before WBC Planning acceptance?

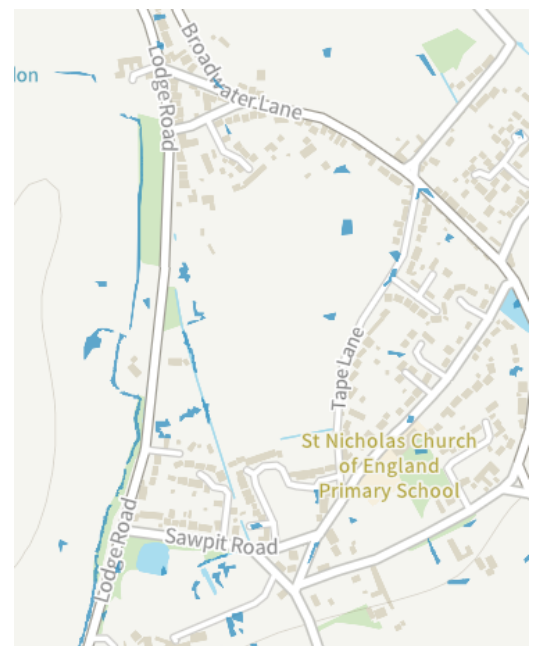
(4.1.1) For Willowmead fields specifically, the Applicant has submitted an allegedly GOV.UK flood zone map showing a remarkable absence of surrounding local fluvial flooding: Specifically looking at GOV.UK data submitted with this planning application for Willowmead fields, a screenshot (right) shows the Applicant's submitted flood zone map ([Drainage Strategy Report 1.1 Fluvial Flooding](#)). The site marker is on St Nicholas Primary School (not the site) with accompanying text claiming the site is Flood Zone 1. Comparison with the current GOV.UK flood zone map (screenshots above in 4.1) shows that all Flood Zone 2 and 3 flooding predictions either side of Lodge Road/Sawpit via the landfill segregation ditch and impinging on vulnerable areas of Sawpit and Lodge Road, are just not present. With the text suspiciously stating "[Yearly chance of flooding between 2036 and 2069](#)", is there a GOV.UK prediction for the River Loddon to run dry before 2036? The Applicant's presentation of clearly bogus, inappropriate flooding data in the guise of believable GOV.UK data, would be consistent with what looks like an inconsiderate, deliberate intention to deceive, or at best mislead. But much more serious than this one-off Application misrepresentation is the change in surface water flooding data predicted by the GOV.UK March 2015 roll-out described in (4.2) superseding more accurate Willowmead fields App: 230074 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:

In the screenshot (right), the new theoretical, 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 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 allow developers to override legitimate local objections and build on land which floods?

This latest GOV.UK prediction (right) with the [Figure 5.2: EA Updated Flood Map for Surface Water](#) can be compared with the original CampbellReith Flood Risk Assessment and Drainage Strategy submitted for Willowmead App: 230074. The superseded prediction more closely matches the actual surrounding frequent flooding experience. For example, roads surrounding the proposed "Land North of Hogmoor Lane" site pictured below apparently 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 (right) is predicted not to happen in a lifetime. Thames Water 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.



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 above 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 really hazardous for pedestrians, cyclists and motorists.



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, the 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 the Willowmead fields Applicant to gain planning approval for PI Condition (97).

(4.2.1) Directly relevant to Willowmead fields, despite this massive GOV.UK downgrade of flood risk, theoretical flood ponding is still predicted around Willowmead fields infiltration test pit INFL4 - where the actual much larger pond photographed (right) forms. This 2023 photo showing an extent of flooding which is yet again greater than the GOV.UK once in a 1000 years prediction. This photo highlights the overall problem for draining this contained, soggy site, which topographically rather like a large saucer, at present retains pluvial storm flooding usefully holding-up storm water run-off which would otherwise immediately deluge School Road, Tape Lane and the Village Halls.



Surely, as part of a proposed development, this valuable “swale” capacity for flood compensation within central Hurst must be retained on site so as not to harm neighbours. However, the Applicant appears to have no intention of replacing the present onsite flood compensation and hold-up, as confirmed by: [Drainage Statement, Drainage Strategy Report, 5.7](#) which states:

“Swales, suitable for use – No, there is no space available.”

To meet PI Condition (97) if there is no demonstrably feasible surface water drainage scheme acceptable to WBC as LLFA, then logically there must be no houses! As a way forward would it not be appropriate to reduce the number of houses proposed by the applicant to make way for suitable onsite swale capacity? Perhaps with sympathetic redesign setting back the proposed houses to allow room for a swale, green buffer space and wildlife corridor to protect the boundaries at increased flood risk? For clarification details of specific sensitive boundaries follow (5):

(5) Surrounding flood prone areas that would benefit from swale storm flood compensation being kept within the proposed development: An effective northern boundary “M” (or inverted “W”) swale and buffer along the School Road frontage and the School/Vine Cottage boundary footpath, could surely be included onsite to protect immediate Neighbours at certain risk of increased and damaging storm run-off flooding:

(5.1) Vine Cottage: To the northeast of the site is Vine Cottage. This area adjacent to Willowmead fields behind the school is shown as marsh on the OS map (photo right). It is understood that since the School was extended, waterlogging in this marshy area has increased and WBC must surely ensure the proposed Willowmead fields development does not adversely change flood risk to Vine Cottage. Creating a neighbouring new swale would help control the proposed development’s storm run-off and maintain a wildlife corridor. The Vine Cottage site is mentioned in WBC character area core documents 2019, namely: [“C2.6 There is one Proposed Local Wildlife Site \(PLWS\) at Vine Cottage, Hurst designated for wet woodland. The main features of habitat are small water bodies including the drainage channels and small farm ponds with permanent aquatic vegetation some of which support great crested newts and a good population of water voles.”](#)



(5.2) St Nicholas Primary School play area: To the north, the adjacent School play area (2023 photo right) gets seasonally quite muddy and sometimes unusable. WBC should probably be looking at if at all possible ameliorating this situation in any case, but with no roadside ditch on this section of School Road, again replacing the proposed hard car park with a neighbouring swale at this point could well be a sensible way to help make this educational space more usable.



(5.3) School Road opposite Tape Lane: To the northwest along School Road boundary, there is no ditch but a slight bank which currently keeps storm surface water within Willowmead fields. Once this boundary bank is removed and replaced with flat paved car park and let-down kerbs, storm flooding will simply spill both across School Road into Tape Lane, and past the Village Halls towards the adjacent ditch (photo left).



The ditches in the Sawpit area approaching Church Hill (pictured above) are Hatchgate ditch tributaries which are no longer linked to any EA Main Rivers for onward flow. Extra storm run-off from the proposed development will simply add to flooding accumulating around at the bottom of Church Hill and Little Acres near the Village Halls. Both

WBC and the Parish Council should be concerned at the prospect of worse flooding in front of the Village Halls (not so long ago pictured in the press with flooding being pumped away by fire engine).

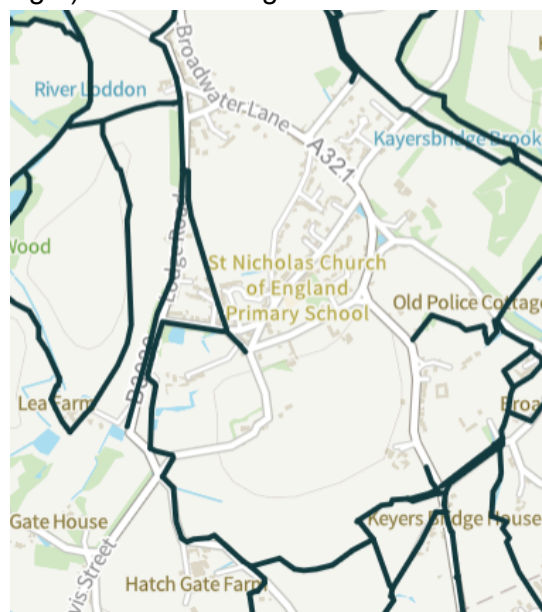
(5.4) Orchard Road is a mess: The southern boundary of the site is with Orchard Road. The site of Willowmead's original entrance, surely the vehicular entrance for the proposed development should be onto this quieter road rather than creating foreseeable traffic hazards on School Road?

The photo (right) also demonstrates the results of WBC's lack of enforcement action to maintain Hurst's roadside flood compensation. To the right a new entrance to Willowmead has been made by filling-in the ditch with only a small culvert. In the foreground the previous access still remains in place. Several cubic metres of ditch flood compensation have been lost and not replaced. Opposite to the left, shallow roadside swales have disappeared. Combined with heavy traffic pushing the verges beyond into the roadside ditches, like many other similar situations in Hurst, the Road is becoming the drain as suburbanisation of frontages continues unchecked. Google Streetview "See more dates" is a useful tool for a quick assessment as to what has changed with time. Again, other than storm flood compensation there is no onward drainage from these linked but disconnected from any EA Main River Hatchgate Ditch tributaries.



Specifically, regarding the proposed Willowmead fields development, from the onsite road plan it looks as if a south Orchard Road entrance is already tentatively planned for the more upmarket proposed dwellings. Will this additional south entrance require even more of Orchard Road roadside ditch to be lost without compensation? For much of the year Orchard Road is already a semi-flooded mess and really does need some WBC action with or without any Willowmead fields development - perhaps first via WBC LLFA advice to riparian owners, or ultimately enforcement to maintain local ditch/swale storm flood compensation capacity?

(4.3) Update of online Environment Agency EA Main River data is long overdue: EA Main Rivers (local ditches), shown on GOV.UK Flood maps (screenshot right) are misleading and inaccurate - showing digital virtual EA Main Rivers (drainage ditches) 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 the 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 Willowmead fields development will now take the tortuous southern/eastern route, draining first towards Sawpit, Lodge Road, and then south and east around Hurst hill towards Keyers Bridge – contributing to “S-19” flooding.



At the recent “Lodge Road” Appeal it was asked directly [“when will the Environment Agency update their wrong and misleading online GOV.UK/EA Main River data”](#) but question received no answer from EA representatives present or anyone else. Summarizing the EA response to previous similar written request to correct the maps, the EA stated in their email response that it would be difficult and no procedure existed to alter the online EA Main River map. 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 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 Willowmead fields pluvial run-off will temporarily drain before it 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 the Willowmead fields site; they have put forward good ideas, the EA needs to stay more focussed and committed and see them through!

(4.4) Ordnance Survey Map for Hurst (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" in the east (Hurst) bank of the Loddon is shown (but not annotated on GOV.UK flood maps). 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?

(4.5) Wokingham Borough Council core documents need general updates specifically for Hurst to avoid misuse by developers, resulting wasted time in planning review and appeals, and to reduce risk of poor decisions being made: It's hard to know where to start, but it would be helpful if WBC can make Hurst a priority when updating core information concentrating first on properly describing man-made topographical changes to the River Loddon floodplain B1: Loddon River Valley with Open Water.

(4.5.1) For instance: The Environmental Designation Plan has no designation for "General waste landfill" or any landfill, although the hills themselves are shown with contours and shaded relief on "Topography and Watercourses". The WBC SFRA CHARACTER AREA maps still show the virtual non-existent EA Main Rivers; the Whistley Park Ditch still wrongly shown running north to the Loddon through the landfill; the Whistley Green Ditch (the now filled-in northern section of the Hatchgate Ditch) running north by Lodge Road, no longer connecting with the River Loddon and even built-on in Whistley Green.

WBC core documents Key Characteristics for C2.1 state "**The Hurst River Terrace is a relatively flat lowland landscape above the River Loddon lying almost entirely at 40m AOD with gentle shelving slopes falling to the river valley below.**" Firstly, 40m AOD is misleading with respect to the Willowmead fields site and other similarly low potential development sites in central Hurst Terrace, a roughly triangular area surrounded by Flood Zones 3 and 3b to the east and west and Zones 2/3 to the south. Willowmead fields partly lies near 38m AOD level, three other sites in Hurst Terrace (the subject of recent Planning Applications), Hogmoor App:240853 and Lodge Road Apps:242067/252934, have significant levels in the 37m AOD range. Secondly gently shelving slopes do not "fall" into the river valley below; except for Church Hill central Hurst is a good definition of the word "flat". Immediately west of Lodge Road the low flat land of C2 (near 37m AOD and at nearby new App: 252934 site) meets the new raised man-made features of Hurst Landfill hills beyond the Landfill perimeter/segregation ditch. Further south on B3030 west of Davis Street, the low land of Hurst Terrace meets the higher embanked Black Swan Lake and raised landscaping including the gravel waste "golf course" hill. Why is this altered topography not described as it is, a man-made barrier which now effectively traps pluvial flooding in Hurst village?

East of the (Hurst) river bank weir located a few metres within Woodley, where the River Loddon dumps rising river level into Hurst's defacto Sandford Lane/Lavells' Lake Flood Zone 3b area, means at this point not only is Hurst River Terrace and Loddon River Valley C2 and B1 not "falling to" the River Loddon, but upstream of Sandford Mill Hurst is actually below the level of, and rising to an embanked higher rising and higher River Loddon – often flooding Sandford Lane in Hurst; not Woodley!

The raised level of earth embanked Black Swan Lake's 300,000 cubic metres of stored water and surrounding landscaping above the original floodplain and Flood Zone 3 level is not highlighted or clearly described; this valued recreational amenity is not, as currently described, a "restored" floodplain once again providing flooding compensation, with its stoplog level-raising weir, it is an EA designated "reservoir" and potential if low flood risk for habited central Hurst. Etc.etc,etc.

By now WBC Planning must be aware of what needs updating from residents' previous planning application responses and it has been evident at Hurst planning appeals information provided to the Planning Inspector by WBC Planning carries much more weight than residents' comments. It may be a lot of admin work but had relevant WBC core documents been accurately and honestly updated beforehand then perhaps less time would have been wasted reviewing Applicants' inappropriate FRAs and drainage schemes, and perhaps the Planning Inspector might have better appreciated the Willowmead fields situation, supported WBC's correct decision to refuse planning permission, and not have granted the conditional Willowmeads field appeal.

I'm sure there may be Hurst residents with local knowledge who could help support WBC with accurately updating Hurst's flooding and drainage history via perhaps Hurst Parish Council or New Hurst Village Society if required...

(4.5.2) Is the risk of flooding in Hurst well understood by WBC Planning? The new Local Plan is an important new document which in 10. Flooding and Drainage states in 10.2 “The risk of flooding is well understood”.

It is hoped this proves to be the case in future, but past and present evidence is not good, specifically:

- See (4.1) current GOV.UK Flood Maps display clear errors.
- See (4.2) current March 2025 GOV.UK Surface Water Flood Maps very seriously underestimate surface water flooding frequently experienced within Hurst.
- See (4.3) inaction by the Environment Agency to delete non-existent EA main Rivers from the database.
- See (4.4) Ordnance Survey maps do not properly show or annotate Hurst’s topography and drainage.
- See (4.5) WBC core documentation for Hurst misleads in many respects. Past reports like 2016 for Sandford Lane flooding not identifying the permanent weir source of deliberate “3b” flooding. The otherwise positive and constructive “S-19” report carelessly issued stating “the River Loddon flows south, east of Wokingham”.

It would have been reassuring had the local plan included a commitment to help review and improve this out-of-date and misleading in-house and GOV.UK core data and acknowledge the reasons for Hurst’s unusual, largely man-made current pluvial flooding problems.

At the recent Lodge Road Appeal, other than WBC Planning’s Mr Croucher’s laudable stiff defence of the Council’s decision regarding the sequential test based primarily on fluvial considerations, the lack of any discussion of Hurst’s actual pluvial flooding issues, the lack of any challenge to the Appellant’s KC’s and Expert Witness’ wrong statements or any 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 – as it similarly was at an earlier appeal; the complete acceptance by WBC Planning of the Developer’s clearly flawed FRA and drainage proposals for Land North of Hogmoor.

Hence how WBC Planning now handle the drainage issues at Willowmead fields to meet the Planning Inspectorate’s condition (97) will be a chance for WBC as LLFA and Development Control to demonstrate WBC really do now understand the flooding risk in Hurst and prove it to Hurst’s residents by making sound technical decisions and taking firm enforcement actions – a relevant recent demonstration of WBC’s past competence handling drainage and all other reserved matters is still very fresh in the mind and the “Sawpit” debacle must not be repeated.

A.A. Butler