

Hogmoor PiP Appeal: APP/6011047

Land north of Broadwater Lane and west of Hogmoor Lane, Hurst WBC App: 620353

Permission in Principle application for the proposed erection of a maximum of 7 and a minimum of 5 dwellings, including formation of an access from Broadwater Lane.

Submitted by: A A Butler

Address: Cherry Trees, Cranford Drive, Hurst, READING RG10 0ET

Date: 15 July 2026

The previous detailed WBC Planning Application and subsequent Appeal to permit development of this valued sensitive WBC Site Ref: 5HU030, were both refused and dismissed. With the benefits and harms having been only recently discussed at length and appropriate decisions made, is not the Developer's submission of PiP App: 260353 and subsequent appeal, with even less commitment to anything, or design detail to appraise, surely not only inappropriate but a rather an irresponsible waste of both WBC's and The Planning Inspectorate's resource.

(I) Previous representations/comments made objecting to the proposed development remain applicable:

My previous Interested Party comments still apply in full, see: [260353 Documents, Page \(3\), "AA Butler Date received 09/03/2026"](#) with one clarification to avoid possible confusion – the correct WBC Site Ref: for 5HU030 was used, but apologies for occasionally mistakenly using wrong reference "5SU030". *Note: A web search for 5SU030 came up with the same 5HU030 site reference "WBC 2023 SFRA interactive (Hogmoor) map" – with "AI" indicating an apparent common typographical system error.*

(II) The inspector's decision letter 17/10/2025 for Appeal: APP/X0360/W/25/3359898 (WBC App:240583) [260353 Documents, Page \(2\) "APP - Appendix 1 - Broadwater Lane Decision Letter 17 Oct 2025 Date received 09/06/2026"](#), records Inspector Mr T Burnham's considered points (1) to (62), and it is hoped The Inspectorate will support The Inspector's reasoning and previous decision and similarly dismiss this Appeal.

(III) In addition to the points documented by Inspector Mr T Burnham, it is hoped the Inspector will also consider earlier Interested Party Consultation Responses and concerns, at the time inexplicably ignored and not addressed by WBC Planning, and as a result residents' responses not likely to be considered credible or be given due weight or importance in The Inspector's decision. These serious and relevant concerns include likely increased neighbouring pluvial and sewer surcharge surface water flood risk directly caused by development, and absence of confirmation from Thames Water the increased drinking water supply and the additional sewage capacity can be handled without increasing incidents of either sewer surcharging or disrupting water supply to existing Hurst residents. This omission of any discussion on flooding and drainage by both WBC and the Inspectorate was surely not consistent with WBC's stated policy that ["views are important to the Council and are fully taken into account"](#)?

(III)(1) Firstly, please consider the 90 Interested Party Consultation Responses previously submitted with App: 240583 describing serious surface water flooding adjoining Site Ref: 5HU030 – responses apparently ignored by WBC Planning who appear to be placing undue reliance on computer-based, virtual, misleading GOV.UK “absence-of-flooding” predictions which ominously don’t match reality; unresolved issues described in detail in App: 260353 Representation: “(3)(4)(8) & (12) Comments AA Butler Date Received 09/03/2026”.

Summarising previous comments: For the Applicant’s previous App: 240583, ninety (90) Interested Party WBC Consultation Responses specifically mentioned flooding concerns. Many responses were heart-felt statements highlighting the frequency, extent, depth, and sewage contamination of existing local flooding affecting surrounding roads and existing properties designated flood-free GOV.UK Zone 1. Some statements recounting A321 and Hogmoor Lane flooding being impassable in wellington boots, with obvious sewage contamination present, also reporting sewer and landfill leachate surcharge from the Hogmoor Lane/A321 junction foul “sewer manhole cover. There are reports of property frontages and doors having to be sandbagged, and where a tractor stuck in the mud had to be pulled out of this proposed low 37m AOD waterlogged site. A consistent theme in residents’ comments is pluvial flooding problems across Hurst are getting worse. Typical of photographic evidence backing-up residents’ written statements, is the photo (right) of surface water flooding looking south along closed Broadwater Lane; the main A321 through Hurst between Twyford and Wokingham. Also looking towards the proposed site entrance to the left beyond the trees.



Increased surface water run-off from the proposed built-on and paved site, raised 0.7m above the near-37m AOD levels pictured, is most likely to increase not decrease the present significant A321 flood risk, and the likelihood of increased incidences of main road closure due to flooding pictured above. Elsewhere on roads through Hurst, Church Hill (connecting A321 and B3030), was closed due to flooding both last year and in 2024 following the driest Spring for 69 years – Sandford Lane between Hurst and Woodley is a notorious flood zone 3b site of regular road closure due to flooding.

In the screenshot below WBC’s 2023 SFRA detailed 5HU030 site summary wrongly implies “the site is still likely to be accessible” – this is clearly not the case as pictured (above), and perhaps the SFRA theorising needs to be reviewed to match the reality.

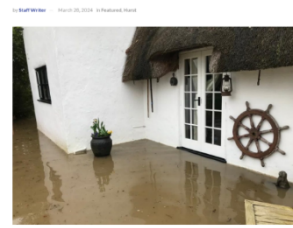
Access and egress

The site access is impacted by surface water.

For the 3.3% AEP scenario, all routes above are likely to be accessible as flood water depths are between 0.15 and 0.30m.

For both the 1% AEP and 0.1% AEP scenarios, there is a surface water flow path along Hurst Road A321, but the site is still likely to be accessible via this route as flood water depths do not exceed 0.30m. But access to the site using Hogmoor Lane connected to Poplar Lane is likely to be affected as water depths are between 0.30 and 0.60m; surface water flow paths have entirely covered this access route.

The pluvial flooding pictured above is much worse than that predicted by the current GOV.UK Surface water flood map for planning 1 in 1000-year case, the 1 in 30-year case showing no flooding at all. Similarly, the recent WBC S-19 flood report specifically addressed flooding at nearby at-risk White Rose Cottage; sewage and leachate contaminated flooding pictured in “Wokingham Today”, flooding which GOV.UK absurdly predicts won’t happen at all, even in 1000 years.



It is hoped The Inspector will not only support WBC’s previously stated reasons for planning permission refusal but also consider adding a need to first properly assess the likely increased surface water flood risk to Broadwater Lane, Hogmoor Lane, and neighbouring properties, as a further sound reason to dismiss this Appeal.

(III)(2) Secondly, Thames Water ought to reconfirm adequate Sewer Capacity:

The Applicant’s Thames Water responses included in previous “App: 240583 Documents “APP – File 05a – Flood Risk Assessment Issue 3_1 Oct 2024 Date Received 22/05/2025”, stated: “no sewer flooding (28 Nov 2022)” and: “sufficient sewer capacity (7 Dec 2022)”, and conditionally: “This confirmation is valid for 12 months or for the life of any planning approval that this information is used to support, to a maximum of three years.” Both these statements by Thames Water, apart from being wrong, are no longer valid and really ought to be reconfirmed for App: 260353.



Foul Sewer Capacity is currently Exceeded: Thames Water “no sewer flooding” information is wrong; even ignoring Hurst’s previous recent history of sewer flooding elsewhere particularly severe in 2014. The April 2023 photo of adjacent Hogmoor Lane foul sewer manhole surcharging (left) confirms Hurst’s sewer capacity is sometimes exceeded (a similar photo appears in WBC’s recent S-19 flood incident report). See Representation: (5) AA Butler Date received 09/03/2026, and among 90 INTERESTED PARTY

Representations for App: 240583 was Mrs Louise Kendall’s informative statement: “*The drainage system is already unable to cope with heavy rainfall - rainwater frequently bubbles out of the drain cover at the top of Hogmoor Lane near Long Barn.*” (240583 Documents, Page (8) fifth down). I have often reflected on what I was standing in taking this photo close to the Hogmoor site – containing some rainwater but mostly pumped foul sewage and leachate!

From comments regularly made in the past by Councillor Wayne Smith and others, the surcharging indicates limited capacity of Thames Water Broadwater (Twyford) SPS BROAP2ZZ, just off the A321 near the Broad Hinton junction, to manage Hurst’s sewage. WBC as LLFA should be aware of this problem and Broadwater pumping capacity needs increasing to avoid both the current surcharging, and increased incidences of surcharging due the connection of newly built properties.

In future sampling and testing for contamination would be informative - testing for not only for sewage but also for leachate contamination (cyanide, lead, copper discharge increased in 2016). If it has not yet happened, Thames Water need to urgently update and correct their sewer surcharging records for Hurst to provide correct information to Applicants and WBC!

Since Thames Water's 2022 responses, new houses at Nursery Gardens have been occupied, as have new larger than planned houses built in 2024 at Little Acre, Sawpit. Also, WBC have since approved developments not yet commenced at Hatch Gate and Nelson's Lane with no defined water supply, drainage, or sewage disposal arrangements. The Planning Inspectorate has conditionally approved a development of twenty-three houses App: 253074 (Willowmead fields). As with App: 260353 the Applicant for Willowmead development has submitted no communication whatsoever from Thames Water confirming infrastructure capacity to handle increased sewage or drain increased surface water run-off without increasing neighbouring flood risk. Planned and Approved increases to handle both sewage and surface water drainage are adding up but with no commitment from Thames Water this proposed increase can be handled by Hurst's sewers.

(III)(3) Thirdly, low and variable Mains Water Pressure in Hurst must not be made worse: For recent refused WBC App: 242067 (Lodge Road, Hurst) Thames Water did respond: *"Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal."*

Since representations were made regarding App: 260353, we have increasingly experienced frequent lower and variable mains water supply pressure - now regularly dropping well below 2 bar (30psi), sometimes to less than 1.5bar. This has become worse since late April when a previously reliable upstairs Triton electric shower has failed to heat in the morning due to lower, variable, water main pressure. Thames Water have been made aware, and it is believed other Hurst residents are also experiencing problems including our immediate neighbour. Thames Water have since responded to my letter, telephoned twice, and visited site with no satisfactory resolution so far but with communication ongoing and a commitment to further response in two weeks.

Note: If other Hurst residents are considering fitting a mains water supply pressure gauge a suitable range is 0-4bar (0-60psi)- normally indicating mid-range near 2bar (30psi). However, Thames Water guarantee only 1bar (15psi) mains supply pressure at ground or kitchen floor level which will not provide sufficient head to allow a 7.5kW Triton electric shower to operate (around 1.7bar ground level supply pressure required for upstairs Triton 1bar minimum operation).

(IV) To help Thames Water supply mains water and handle sewage and drainage in Hurst without adversely affecting our lives and ability to shower first thing in the morning, would it not be sensible to make any Planning Application approvals for further development conditional on first obtaining suitably "informed" Thames Water responses and commitments on infrastructure capacity? (See (V1)(2) below)

Thames Water have statutory responsibilities to connect new properties once built, however Is The Planning Inspectorate able to sensibly require that WBC get the Applicant for App: 260353 to first consult, and get appropriate valid responses from Thames Water? And provide evidence that WBC has beforehand made Thames Water fully aware of all the WBC approved developments queueing up, and already committing to future additional load on Hurst's existing infrastructure?

(V) *Am I the only Hurst resident who feels frustrated and upset by WBC Planning's continued unquestioning use of, and continued failure to attempt to correct, demonstrably wrong core online*

GOV.UK/EA/OS drainage data for Hurst, as well as well continued use of demonstrably wrong in-house core data contained in WBC documents?

Instead of sticking our heads in the sand, is it not time Hurst’s flooding issues are recognised by all, the problems worked out, and how they might be ameliorated or solved? Following a general summary below of how WBC might review various issues within their control to help improve the situation (see (V)(1 to 5)), new comments are made relating to flooding and drainage applying to App: 260353 final WBC Planning Officers’ reports where there is disagreement with the opinion expressed and with misleading or simply wrong text.

(V)(1) Honestly and accurately describe man-made barriers now built on, and displacing Hurst’s western B1 River Loddon floodplain comprising the earlier embanked reservoir and surrounding raised landscaping in Dinton Pastures west of Davis Street, but more significantly the later huge waste landfill hills west of B3030 Lodge Road now restricting natural drainage from, and trapping pluvial surface water, in central Hurst C2.

(V)(2) Update Hurst’s WBC core document “Character Area” descriptions including WBC’s SFRA Hogmoor site ref: 5HU030 details. Urgently in the case of “Existing drainage features” to remove any reference to non-existent GOV.UK/EA Main Rivers “to the west of Hurst draining in a northerly direction to join the river Loddon”.

(V)(3) Urgently update WBC’s 2023 SFRA to show Hurst’s recent, worsening, post-2013 flooding history, including formal WBC Flood Reports (2014, Sandford Lane 2016, S-19 2024), incidences of recent repeated flooded road closures (A321, Church Hill (2024, 2025), Sandford lane (every year – more than once), and sewer surcharging (particularly near A321/Hogmoor junction), etc, etc. To class the 2023 SFRA WBC site specific flood history in the screenshot below as an understatement, would be an understatement!

Flood history	The Environment Agency’s historic flooding and recorded flood outline datasets show that 1.1ha of the northeast side of the site is within the historic flood map and the recorded flood outline dataset. Historic flooding records provided by Wokingham Borough Council did not show any records of flooding on the site. However, there were three records of flooding in the surrounding area of the site, one 2013 record 450m north of the site and two records, dated 2008 and 2013, within 800m south of the site.
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(V)(4) Update WBC’s 2023 SFRA to include the main Black Swan Lake reservoir flood risk for site ref: 5HU030. At present remote Bearwood Lake and Southlake reservoirs are documented but not the much higher risk, larger, nearer, stored water in Dinton’s BSL embanked leisure lake.

(V)(4) Place increased weight on Hurst’s documented flood history “proof of evidence” and recognise the deficiencies in GOV.UK Flood zone maps for planning, which must surely now be considered unsafe for sole use in WBC Planning’s decision making? Following 2025 roll-out, the largely unchanged GOV.UK Flood maps for planning for “flood zones” currently display impossible, easily checked, omissions and anomalies (eg: designating flood zone 3 on top of Hurst Landfill hill, landfill segregation ditch and raised Dinton features completely missing, etc.

(V)(5) For Hurst, completely disregard seriously downgraded 2025 roll-out 30-year default GOV.UK Surface water flood risk maps for planning, which have wrongly and massively reduced predicted short-term flood risk – for instance predicting zero risk of flooding on A321 pictured above closed to traffic!

General note: Bearing in mind the PiP site lies within overall Hogmoor site WBC ref: 5HU030, and a significant aspect of the previous application was the two “roads north to nowhere” with unusually detailed “figured dimensions”, indicating a clear intent to support future extended development beyond that proposed fronting Broadwater Water Lane. Presumably on the same basis that once area character harm has been caused by this initial “Hogmoor Lane” development, it will be easier for the Applicant to obtain further approval to develop the whole site. Similarly, with this “Trojan Horse” PiP it is easy to imagine how the incongruously tortuous access road would be adapted to serve additional intended development to the north. Hence, the following comments are made regarding the PiP but also realistically consider the planning history and a reasonable view as to what is likely to happen with the whole 5HU030 site once development starts.

(VI) Comments on WBC App: 260353 Planning Officer comments:

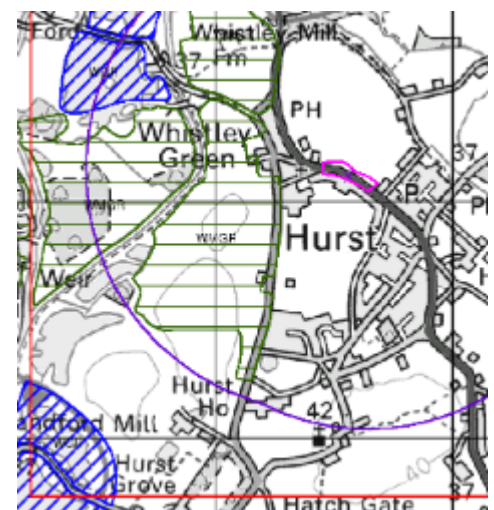
(VI)(1) Decision Notice PiP, Date Received 30/03/2026: Informatives: “Supplementary Statement on Flood Risk ISSUE: 01, ref. P23-1019 Issue 01, dated 09/07/25 prepared by Simpson TWS”. Specific comments made in “AA Butler Date received 09/03/2026 (14.1 -14.3)” still apply.

The Applicant can’t be bothered to correctly delineate the PiP site within 5H030. Absurdly insists GOV.UK Flood zone map predicts zone 1 with no flooding yet presents a strange composite surface water flood map which doesn’t match current GOV.UK Surface water flood map for planning default case – which itself implausibly shows no flooding on the A321, or on Hogmoor Lane “frontage” (respectively pictured flooded and impassable (above) with sewer surcharging).

Reservoir flood risk impinging on site ref: 5HU030 is not addressed in the supplementary statement, or addressed in the Applicant’s earlier FRA - the Applicant deliberately evading the subject, using a typical contractor’s FRA ploy experienced before, to disrespectfully submit a meaningless random “*Figure 18: EA Reservoir Flood Map*” of an irrelevant site location – in this case near Esher, Surrey; not Hurst!

It has been disturbing discover how inaccurate the core information used for Hurst planning applications has been, Misleading data provided by what should be respected Authorities; GOV.UK, Environment Agency, Ordnance survey and WBC.

Unfortunately, professional-looking, inaccurate, misleading, confusing information is present in almost everything one reviews. For instance, the screenshot of the “Landmark” geological “Artificial Ground and Landslip” map from the Applicant’s preliminary risk assessment, is meant to show disturbed and man-made ground. Incongruously, west of Lodge Road on B1 the map shows 40m contours for the three distinct



waste landfill hills replacing floodplain yet incorrectly does not show the area as disturbed ground; Ordnance Survey do not even show the contours.

This Applicant's supplementary statement does little to inform except to confirm the Applicant is obviously not at all concerned with the likely increase in flood risk elsewhere in Hurst due to the intended substantial raising of the near 37m AOD existing greenfield ground level with the associated reduction of infiltration at the 5HU030 site.

From a technical point of view, it is perhaps surprising such obviously flawed FRA documents aren't simply rejected by WBC as LLFA; it is very disappointing that WBC Planning don't appear to question the obvious flaws, such as in the "Landmark" screenshot above and get them either corrected by the Applicant, or have the misleading document withdrawn.

(VI)(2) WBC's Delegated Officer Report: "Planning Decision Notice & Officer Report, Signed Officer Report, 260353 Date received 27/03/2026". In WBC's consultation responses "**Thames Water Utilities Ltd – Wished to make no comments**". The screen shot below from WBC's 2023 SFRA states that for the site-specific FRA, consultation with the Water Company should be undertaken at an early stage. "No comment" is clearly not a satisfactory response for Hurst residents at risk, and surely WBC as LLFA must insist on an informed Thames Water response being submitted by the Applicant for App: 260353? See (III)(2), (III)(3) and (III)(4) comments above.

Thames Water may have their faults but are responding to my variable mains supply water pressure off School Road query (if slowly) ((III)(3) above) – WBC Planning surely need to persist and try harder to make the Applicant come up with an appropriately informed and valid Thames Water response?

	Flood Risk Assessment: • At the planning application stage, a site-specific FRA will be required as the proposed development site is shown to be allocated in fluvial Flood Zones 2, 3a and 3b and at surface water flood risk. For surface water the site is particularly at risk in the 1% AEP, 0.1% AEP and 1% AEP plus 40% climate change events. • All sources of flooding should be considered as part of a site-specific FRA. • Consultation with the Local Authority, Lead Local Flood Authority, Water Company, and the Environment Agency should be undertaken at an early stage.
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(VI)(3) WBC's Delegated Officer Report: "**WBC Drainage – No objection (subject to condition)**". Unfortunately, the **planning constraints status** is partially clipped and not fully readable. Dependent on the planning condition or constraint of course, this is a disappointing WBC response for Hurst residents especially in view WBC's mishandling of the recent "Sawpit" Little Acre development where WBC accepted clearly flawed, unfeasible, Applicant's FRA

drainage proposals for onsite infiltration drainage from what became much larger houses, approving clearly impractical proposals which predictably proved useless on a typical waterlogged Hurst site. Excess surface water has now been simply inconsiderately directed offsite towards a neighbouring ditch/swale with no onward flow increasing neighbouring flood risk, see; “AA Butler Date received 09/03/2026, APPENDIX (D)(UOSMH) Update Ordnance Survey Map for Hurst: Including issues restricting The Hatchgate Ditch flow to the south” – Ordnance Survey have apparently visited site simply marked this Lodge Road area lacking any onward flow ditches as “Issues” on GOV.UK Flood maps.

(VI)(4) WBC’s Delegated Officer Report: Page 3 of 35, REPRESENTATIONS, – “Flooding in Hogmoor Lane”: Why does the WBC Planning Officer document only state a “flooding in Hogmoor Lane” representation, a quiet narrow country lane leading to relatively few dwellings and providing no traffic short-cuts, yet not mention the more serious flooding and closure of Broadwater Lane, the main A321 Twyford to Wokingham road through Hurst pictured above? Was this just an oversight or is it because flooding in the lower sections of Hogmoor Lane is consistent with GOV.UK Flood map predictions but A321 flooding is not – inconveniently challenging the validity and unverified use of current wrong GOV.UK data? This aspect is covered in more detail in earlier comments “AA Butler Date received 09/03/2026 (4) Fluvial and Pluvial GOV.UK Flood map for planning maps rolled out in March 2025 are flawed and should be used only with due care and scepticism”, and “APPENDIX (A)(MSWFR) Misleading GOV.UK Surface Water Flood Risk data”, and “APPENDIX (B)(FZGE) GOV.UK Flood Zone Map Glitches and Errors to be Reviewed”.

(VI)(5) WBC’s Delegated Officer Report: Page 11 of 35, also para (35) of Mr T Burnham’s report, see the screenshots below:

The appeal site and the wider countryside beyond make for a pleasant backdrop to Broadwater Lane. The residential development on the opposite side of Broadwater Lane is largely continuous, linking Hurst and Whistley Green. This makes it difficult to assess when on the ground on this part of Broadwater Lane where these respective settlements begin and end meaning that there is no obvious gap between the two settlements in this particular location (para 35).

Despite the conclusion by the Inspector, it is worth noting that this proposal would only see the partial closure of this gap along Broadwater Lane, however open land to the west would be retained, and so the erosion of the ‘gap’ in full would now not occur. Given the Inspector’s previous conclusions, it is not considered that development in the parcel of land fronting Broadwater Lane would result in settlement coalescence.

35. The appeal site and the wider countryside beyond make for a pleasant backdrop to Broadwater Lane. The residential development on the opposite side of Broadwater Lane is largely continuous, linking Hurst and Whistley Green. This makes it difficult to assess when on the ground on this part of Broadwater Lane where these respective settlements begin and end meaning that there is no obvious gap between the two settlements in this particular location.

There has been much discussion on the degree of “coalescence” between Ward’s Cross and Whistley Green, but the 16m green gap to the west between Skomer and Elder Cottage pictured (right) is a much-valued gap offering pedestrians a welcome vista towards Lodge Road. The existing low rise character buildings, set back, and with a low roof line and a soft gradual height transition, these pleasant semi-rural surroundings are good for the soul. Do we really want this current Hurst character environment permanently lost destroyed to a new build housing estate corridor with dominating houses (like Sawpit’s), their ground floors already selfishly raised 0.7m (2ft) above those of the neighbours to protect the new properties from the known surface water flood risk?



A serious point illustrated by this picture is that apart from Hurst Hill, central Hurst C2 is very flat. The low near 37m AOD land pictured leads to the area of Hurst that is probably at most risk from increased surface water flooding due to raising land levels within site ref: 5HU030 – the vulnerable lower arm of the reversed “C” pattern of Hurst’s present development - the area between Sawpit and Lodge Road. With Hurst Landfill hills (in the distance in the photo) now trapping water within C2, all-natural drainage in this area must now flow first south around Hurst Hill, then east, and then north just east of the Hogmoor 5HU030 site. Raising land levels across the narrowing north of Hurst’s flat Pluvial “Trapment Triangle” (bounded by natural Haines Hill, natural Ashridge, man-made Hurst Landfill) should not be done lightly as it will risk making Hurst’s man-made increasing pluvial flooding problem worse. Was an hydraulic drainage study never done before Wokingham Council approved the landfill? If not WBC as LLFA really do need to look urgently at the resulting drainage changes due to what was completed a generation ago.

I’m sure most Hurst residents would disagree with the WBC Planning Officer views and do not approve of any closure of the gap along Broadwater Lane as this partially open space currently contributes significantly to the perceived rural character of Hurst when entering the village from the north.

As well as for the real technical concerns regarding drainage, it is hoped The Inspector will agree with WBC’s decision for refusal of PiP App: 260353 for unspecified development that could potentially cause massive harm to the present agreeable area character, closing the current small, but very significant separation between Ward’s Cross and Whistley Green.

(VI)(6) WBC's Delegated Officer Report: Page11 of 35: A typical example of WBC's continued use of misleading character area descriptions and data is shown in the screenshot below:

The key aspects to be conserved and actively managed are;

- the open views overlooking the adjoining floodplain of the Loddon. There are opportunities to enhance the landscape through restoration and management of the hedgerows. Opportunities also exist to restore lost wetland and grassland habitats and reinstate woodland planting, which may mitigate the influence of the M4/A329 (M).

From the Lodge Road, on the west side of Hurst C2, one does not have open views overlooking the adjoining B1 floodplain of the Loddon. From the lodge Road "Howard's Way" footpath, the boundary between character areas C2 and B1, 50ha of "B1 Loddon River Valley with Open Water" has had gravel extracted and then been filled and piled up with 2 million tonnes of general waste (landscaping completed in 2005). What is now viewed are quite rural gentle green landfill hills, not shown on Ordnance Survey mapping, but with incongruous waste gas collection vents, unmistakably landfill. The original floodplain was destroyed and its flood compensation capacity has completely gone – as have any EA Main Rivers which once drained west and north by and across this landfill. Running north to south between the Lodge Road footpath and landfill is the new landfill perimeter or leachate and run-off segregation ditch, the most significant feature on LiDAR maps - but not shown on either Ordnance Survey maps or GOV.UK Flood maps for planning flood zone maps. In some way the landfill hills make Hurst seem more rural and isolated than it is – they block views not only of The river Loddon but of Woodley and Reading beyond!

Similarly, WBC's hopelessly out of date core data allows Applicant's to propose drainage proposals that in practice are impossible, being based on utilizing virtual natural drainage that is no longer there as the screenshot below from WBC's 2023 SFRA "Existing drainage features" for Hogmoor site ref: 5HU030 shows:

Existing drainage features	Online mapping shows a small drainage channel which runs along the southern part of the eastern boundary of the site. There are also several drainage features surrounding the site. There is an unnamed drain which flows along Hurst Road approximately 145m west of the site. There is an unnamed drain which flows along Lodge Road (B3030) approximately 200m west of the site. These drains flow in a northerly direction to join the River Loddon. There are also two drains located parallel to the eastern border of the site, approximately 60m east of the site, flowing north towards Twyford Brook. The north and south areas surrounding the site do not have any drainage features.
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The unnamed drain "which flows along Lodge Road", known locally as "The Hatchgate Ditch" is long gone and only exists in parts in the Sawpit area as disconnected swales. Nothing "drains flow in a northerly direction to join the River Loddon". Presumably Wokingham Council originally approved Hurst Landfill and has similarly approved development over The Hatchgate Ditch near Whistley Green Farm now making any reinstatement of this destroyed, built-on ditch unrealistic. Also, the nature of the landfill perimeter ditch, now flowing south in the opposite direction to the Lea Farm facilities with a risk of contamination, raises further technical issues with possible reinstatement of original north and west natural drainage.

The two drains located just east of the site now must handle all natural surface water drainage north to the Twyford Brook from Hurst C2 with GOV.UK annotating the Green Man stream as “Kayers Bridge Brook” and Stow stream as “Billingbear Brook”.

Two things are obvious; WBC is not getting accurate work or good value from their SFRA contractor and, it appears there is no one in WBC Planning or as LLFA who has sufficient local knowledge to properly check the contractor’s output. Hurst residents and taxpayers at increased risk of surface water flooding from new higher development surely deserve better, and the sooner something is done about these misleading, inaccurate, core documents and the confusion and wasted time they cause, wouldn’t it be better for all? Is it possible for the Planning Inspector to recommend WBC urgently review and improve core documentation for Hurst.

(VI)(7) WBC’s Delegated Officer Report: Page 26 of 35: The WBC Planning Officer’s comments here are not clear to me, viz: **“More Vulnerable development – is compatible in Flood Zone 1 without the requirement of a sequential or exception test”**. WBC’s 2023 SFRA site ref: 5HU030 site specific information in the screenshot below appears to require the exception test.

NPPF and planning implications

Exception Test requirements	The Local Authority will need to confirm that the sequential test has been carried out in line with national guidelines. The sequential test will need to be passed before the exception test is applied. The NPPF classifies residential development as ‘More Vulnerable’. ‘More Vulnerable’ development is not permitted in Flood Zone 3b. The exception test is required for this site because development classified as ‘More Vulnerable’ is within Flood Zone 3a.
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See: **Wokingham Borough Council Level 2 SFRA 2023: appendix A Site Summary Tables**

See also previous comments: **“AA Butler Date received 09/03/2026, (2) The site fails to pass the sequential test:**

While the vulnerability of the Hogmoor 5HU030 site to groundwater is acknowledged by WBC, all sources of flooding should be considered for a site-specific FRA and for application of the exception and sequential tests. No evidence is provided that WBC Planning have properly considered the following additional sources of flooding which clearly affect flood risk to the site and neighbouring properties:

Sewer surcharging: Sewer surcharging adds to surface water flooding in Hurst in Hogmoor Lane; the example pictured in (III)(2)

Reservoir flood risk: See previous comments **“AA Butler Date received 09/03/2026, (14.3) Reservoir flood risk is an issue for Hurst”**. (14.3) includes a screenshot of WBC’s interactive map which shows reservoir flooding impacting the site. The risk from Black Swan Lake a little over 1km

Reservoir	Reservoir flood mapping shows the northeast corner of the site to be affected by the Wet Day flood extents from the Bearwood Lake and Southlake reservoirs. The Bearwood Lake reservoir affects a larger area of the site, extending approximately 60m into the site. The wet day scenario from the reservoirs is larger than Flood Zone 2. These extents encroaching the sites are deemed as high risk, which means that in the very unlikely event the reservoir fails it is predicted that there is a risk to life.
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away may be low but must be considered. As can be seen from the screenshot below the 5SU030 site specific WBC 2023 SFRA data does confirm “the northeast corner of the site to be affected”. Strangely, more remote Southlake and Bearwood Lake reservoirs are mentioned but not the larger, nearer more ever present risk of Dinton’s embanked Black Swan Lake with its stoplog north end weir just over 1km from the Hogmoor site.

Has the obvious reservoir flood risk from nearby embanked Black Swan Lake been properly considered by WBC’s SFRA contractor, it would appear not?

Surface Water Flood Risk: The highest risk identified by 90 Hurst residents and not considered by WBC is pluvial surface water pluvial flooding; Hurst’s flooding incidents happen during and after heavy rain. Clearly GOV.UK computer output gives hopelessly wrong results for Hurst and must be based in incorrect data and algorithms. WBC as LLFA should recognise this, work out what is causing the problem and include it in the FRA for the exception and sequential tests.

Wokingham Borough Council

Level 2 Strategic Flood Risk Assessment

Detailed Site Summary Table

Site details

Site Code	5HU030
Address	Land north-west of Hogmoor Lane
Area	4.0ha
Current land use	Greenfield
Proposed land use	Residential

It is encouraging the WBC Planning Officer will require the Applicant to further demonstrate that the development can be carried out without increasing flood risk on or off site. However, is it not also the case that WBC should update incorrect core data, including 5HU030 site specific data for the screenshots above, and ensure all sources of flooding are considered for the site-specific FRA and for exception and sequential tests?

(VII) Archaeology and drainage: For WBC App: 253074 (Willowmead fields) the recent archaeological survey revealed the existence of, but did not comment on, earlier ditches across the site (as well as experiencing trenches dug rapidly filling with water). Should archaeological investigations take place on 5SH030 site, would it not be an idea to dig trenches close to A321, at right angles to the road to investigate whether a roadside swale or ditch once existed providing flood compensation for surface water flooding on the main road? Typically, in Hurst roadside ditches fronting properties are being suburbanised which usually starts with disposal of garden and other rubbish in the inconvenient swale until it is finally fully encroached and levelled and no longer provides flood compensation. Has this loss of flood compensation happened along the section of Broadwater Lane fronting 5SH030 site where the proposed entrance for App: 260353 is planned?

(VIII) Chalk Stream Contamination: It may be convenient for Ordnance Survey to continue not to annotate Hurst Landfill as landfill or show the hill contours, convenient for the Environment Agency not to confirm that EA Main Rivers have been destroyed but leave them on the online database, but perversely allow increased discharge of landfill leachate to Hurst's sewer, and convenient for WBC to pretend Hurst's B1 Hurst floodplain remains idyllic just as it once was, but it is likely that in the next few years pollution of the River Thames will come under increased scrutiny by individuals and organisations very concerned with increasing river pollution.

Hurst village residents face a worsening situation with pluvial flooding and where the sewer system reaches capacity resulting in surcharging directly to the River Loddon and Thames. Discharge not just of sewage but also leachate from the waste landfill piled up a generation ago between the village and the river. Yet the Government's agencies for implementing policy, the Planning Inspectorate and WBC continue to approve building which beleaguered Thames Water will have a statutory duty to connect. It's quite easy just to blame Thames Water for sewage dumping killing the only north flowing chalk stream in Britain, the River Loddon, but will planning decisions made in the past and being made currently, also rightly come under increased environmental scrutiny for killing rivers? Agreeing to dump a huge pile of general waste on floodplain next to the River Loddon was probably not the best decision but it's happened, and surely the consequences and long-term risks can't continue to be erased from core documents and ignored by the powers that be?

It is very much hoped the Planning Inspectorate will dismiss Appeal App/6011047