

Lodge Road Representation Flooding Planning Inspectorate Number:
APP/X0360/W/25/3364304

WBC Planning Application: 242067

My comments support WBC's and the Environment Agency's objections to the Appellant's not-fit-for-purpose FRA – as all likely causes of flood risk have not been properly considered and given due weight.

The oddly suppressed, very selective boundary used for the Appellant's hydraulic flood risk modelling, will only ever produce worthless results; a much wider relevant area must be considered to produce valid and realistic flood risk assessments for Hurst

This much larger site boundary is needed to accurately assess the likely significant increased risk and flooding harm this development will cause, not just on site – but much more importantly, to existing neighbouring low-lying properties – especially in vulnerable areas north of Sawpit Road, near Lodge Road, and connected properties already at risk in Hogmoor including White Rose Cottage - recently damaged by surface water flooding - triggering last year's S-19 flood report.

The appellant's site location defined on 6 ¼ OS mapping is a useful reference to describe the overall site context within the massive surrounding man-made changes that created Hurst's current surface water "Trapment-Triangle"- a logical modelling boundary.

This map also highlights serious problems with misleading official data used by the Appellant.

Just west of site, beyond Lodge Road, and annotated as flat low "Whistley Park", the low marshy meadow has been replaced with 50ha of general waste landfill - as high as Hurst hill. Capped with geomembrane and with little infiltration, increased water run-off and drainage is now east towards central Hurst.

Hurst Landfill, not shown or annotated on the OS Map - is clearly shown in Appellant's FRA Figure 2.3. - obliterating any previous EA Main Rivers draining north and west still shown in the appellant's Fig 2.3.

An FOI request was made to the EA to delete these non-existent EA Main rivers from the GOV.UK online database. The EA have responded stating this is difficult and no procedure exists for doing this.

Also not shown on the OS Map is the "new" prominent leachate segregation ditch near Lodge Road, separating landfill from habited Hurst.

Replacing all previous waterways running north and west, this segregation ditch now drains south – not north – for processing leachate at Lea Farm.

Contaminated to some degree with cyanide, copper and lead, the ditch is not shown on OS mapping but clearly appears on all GOV.UK Flood Risk Maps - being subject to:

Surface Water Flooding,

Zone 3 fluvial flooding and,

Wet day reservoir flooding.

Shown in flood in Figure 2.3, the Appellant has drawn the west flood model boundary line to carefully exclude this problem waterway.

Earlier west of Davis Street, south of Hurst Landfill and flood-prone Sandford Lane, a similar area of Hurst floodplain gravel was extracted, and subsequently landscaped with raised features becoming Dinton Pastures Country Park. The up-to 2m high wooden slat weir for 28ha Black Swan Lake is only ¾ mile from site.

Reservoir flood risk from weir failure, vandalism, or wrong core data volume assessment, needs reassessment by the Appellant and LLFA wbc/EA.

But initially, rather than highlight this very local reservoir flood risk, the Appellant's FRA misleadingly used a random site map 40 miles away in Battler's Green, Herts - perhaps to avoid reservoir risk inclusion for the Sequential Test.

Stored water in Black Swan Lake reservoir and its retaining weir, are not annotated on the OS map, nor the contours for the golf course hill or raised features surrounding the lake.

OS have been requested to update their map of Hurst to correctly show and annotate features. An answer is currently awaited to the third request.

If OS "paper" mapping is incorrect, do glitches and errors for Hurst similarly apply to OS online data supporting all flood maps for planning - which absurdly show a strip of highest flood risk Zone 3 crossing the top of the southwest landfill hill?

Resident's annual photos confirm this site floods regularly, annually, and more than the computer predicted once in 1000 years – sensibly requiring all other forms of flooding to be properly assessed.

For modelling Hurst's surface water hydraulics, the trapment-triangle containment pan – the three surrounding higher land and high flood risk sides are defined as follows:

- To the east Flood Zone 3 below Haines Hill,**
- To the west Landfill and Dinton barriers with Loddon Flood zone 3 beyond – but with Flood Zone 3b at the Sandford Lane gap exposing Hurst to fluvial flooding.**
- To the south by extensive areas Flood Zone 2 contained within the catchment area with the higher land of Ashridge beyond.**

The Billingbear Brook feeds into the southeast corner of this big triangular basin, and the only natural flow out to the Twyford brook is via the north, by and through Hogmoor.

Within this area normal surface water from precipitation on the Lodge road site first drains south (not north), around and south of Church Hill – an area now prone to regular flooding - closed yet again in April this year due to flooding – the driest spring for 69 years.

From the soggy junction of Church Hill with Lodge Road and Davis Street, surface water flows south directly towards Hatch Gate Farm in what was the start of the Hatchgate Ditch – originally flowing in the opposite direction - and again not shown on OS mapping.

From Hatch Gate, surface water flows east across Hurst via Lines Road and Keyers Bridge, then north towards Hogmoor.

Both properties, the subject of last year's S-19 flood report are in the path of this increasingly overloaded drainage route – Keyers Bridge House, and Hogmoor's White rose Cottage.

The close near 37m AOD Hogmoor site is hydraulically connected for flood risk to the proposed near 37m AOD Lodge Road site -on the surface via the 16m wide low green gap in Broadwater Lane between Elder Cottage and Skomer – this route is apparent on the Appellant's Lidar diagram.

Both sites are connected by sewer - the Hogmoor manhole, where sewer surcharge adding to flooding was photographed in 2023, is just 100m from site – located near A321 just outside the Appellant's modelling boundary. Linear distance is not important – flood water and sewage will find its own level - the sites are connected hydraulically potentially above and always below.

Regarding sewage - the Appellant has submitted no sewage disposal scheme or Thames water correspondence to check Hurst sewer capacity or the likely risk of sewer surcharging and sewer flooding. This key issue appears not to have even superficially been considered – why not?

At the same time as the massive landscape changes, the subsequent building of around 150 extra dwellings mainly in central Hurst, and the relentless suburbanization of their frontages, removing ditches and swales, has added to the problems of surface water flooding and sewer capacity.

With WBC developments already approved at Willowmead, Hatch Gate Farm and Nelson's Lane – all without defined detailed drainage and sewage handling schemes, is there spare reserved capacity in the system available or being monitored by WBC or Thames Water? From Hogmoor sewer surcharging experience, it would seem not...

I would have liked to have spoken about a new allegedly technical report in Appellant's latest late FRA submission which is pure speculation - very wrongly suggesting Thames Water's Manhole 2801 in Lodge Road, and close-by Summerleaze Landfill vented manhole is part of the Appellant's site drainage system. Thames water sewer maps confirm this is where the Summerleaze pumped bio-solids leachate pipe, and Sawpit pumping station pumped foul rising main connect to the gravity fed Hurst sewer system.

The Appellant's FRA remains even more unfit for purpose.

Andrew Butler