

A A Butler, Cherry Trees, Cranford Drive, Hurst, READING, RG10 0ET
15/04/2026

Ref: WBC email Date: 13 April 2026, Development Management & Compliance

Revised Plans Consultation Application Number: 253074

Dear Madams and Sirs,

I stand by applicable comments already made to WBC 27/01/2026 with respect to The Planning Inspector's Report Paragraph (97) (screenshot below):

97. In the interests of adequate drainage, a drainage scheme should be submitted with or before the reserved matters. I consider it unnecessary for the drainage condition to list the various modelling, guidance and standards with which it should comply, as that could be a requirement of the Council's when it considers those details. Mindful of the possible presence of archaeology, a scheme of archaeological works should be approved. In the interests of public health, a condition should also be imposed addressing any unexpected contamination.

My 27/01/2026 comments remain unchanged in view of the Applicant's minimally revised recent submissions none clarifying the safe offsite discharge of drainage or consents required. In the latest Revised Drainage Report 14/04/2026, the Applicant hasn't even bothered to correct "Church Road" to "School Road" or acknowledge there are surface water drains in School Road, see page 4 (and others) screenshot below:

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

The Planning Inspector's specific conditions (5) and (9) expand on the theme, logic and requirements of paragraph (97), with WBC receiving a new response from the Applicant 01/04/2026 with regarding PI Condition (5) (see screenshot below).

- 5) Prior to the submission of any reserved matters applications an archaeological Written Scheme of Investigation (WSI) together with a timetable for its implementation, shall be submitted to and approved in writing by the local planning authority. The development shall then be carried out in accordance with the approved details and timetables within the WSI.

It is acknowledged the Archaeological Evaluation was submitted as required to WBC 01/04.2026, but it is disappointing the archaeological brief and analysis, apparently approved by WBC, does not include any reference to the possible drainage functions of ditches uncovered, especially as increasing local pluvial flooding problems in Hurst are a direct result of creeping "suburbanisation" with long-standing flood compensation ditches and swales being lost – and which might usefully be reinstated based on what is found during the dig.

However, and despite the relatively dry conditions this spring, the archaeological test trench results do provide very useful information regarding site hydraulic conditions which may help inform WBC's views regarding how Planning Inspectorate condition (9) (see screenshots below) will be met without increasing flooding in surrounding lower lying areas of Hurst.

- 9) With or before the submission of reserved matters, a detailed drainage strategy shall be submitted to the local planning authority for approval in writing. Where surface water cannot be infiltrated but requires disposal off site, evidence of consent to discharge/connect through third party land or to their network/system/watercourse must be provided. Prior to the first occupation of the development the drainage scheme shall be

Appeal Decision APP/X0360/W/24/3342812

carried out in accordance with the approved detailed drainage strategy and shall be thereafter retained.

The Applicant has not yet submitted anything regarding off-site disposal of pluvial surface water which cannot be infiltrated on site yet is proposing to cram 80% of this greenfield site with houses and paving. No onsite sewers are shown draining to anywhere offsite other than nowhere or to an "adoptable" PCC manhole – unacceptably treating the certain increased surface water run-off, and extra sewage as someone else's problem.

As stated, it is worth commenting on the Archaeological Evaluation as it has obvious implications for site drainage and informs us as to the locations where WBC could usefully request the Applicant to dig new "winter/spring" infiltration drainage test pits to provide more realistic data for the Applicant's infiltration calculations on this waterlogged site.

New comments regarding the Archaeological Evaluation and its relevance to site drainage:

(1) At approximately 39m AOD the site is significantly higher relative to surrounding and lower built habited areas of Hurst terrace than the 38m AOD stated in the Archaeological Evaluation (see Archaeology Evaluation SHR 26/36 screenshot below):

The site lies at a height of c. 38m above Ordnance Datum (aOD).

It doesn't! The site level and slope may not overly concern archaeologists dating pottery but is crucially important when it comes to site drainage. The slightly banked boundary with School Road lies above 39m AOD, and at the site boundary with Orchard Road the ground level rises towards the northeast from 39.11m AOD rapidly to 39.57m AOD. At all other boundaries with St Nicholas Hurst C of E Primary School, Vine Cottage and The Village Halls, the existing ground level is close to 39m AOD only going down locally to 38.55m AOD close to Willowmead house – never as low as 38m.

Why on earth would archaeologists need to lie about site level, unless in fluvially "trapped" central Hurst, where every cm above AOD (and the risk of storm/flash flooding) matters, they were instructed to do so?

Hence at present, Willowmead Fields form a significant greenfield “saucer” at the relatively raised centre of the Ward’s Cross/School Road area of Hurst, and currently able to hold-up and retain heavy rainfall. Hurst Parish Council have made clear in their comments “[The key issue is not flooding on the site itself, but the impact of the site drainage strategy on locations downstream from the site.](#)” If this crammed development goes ahead as proposed, with no onsite ditches, swales or surface water compensation and drainage features, storm pluvial flooding will rapidly displace over the surface paving and tarmac by gravity offsite to lower surrounding areas of Hurst, some approaching 37mAOD. Initially spilling out over the new let-down access kerbs across School Road, towards Tape Lane and past The Village Halls to Sawpit Road, Barber Close, Lodge Road, Nursery Close, even emerging close to A321 as sewer surcharging in and down Hogmoor Lane at 37.5m AOD level.

Foul sewer covers for Thames Water manholes 6701 and 7805 in nearby surface water flood prone Tape Lane are at 38.38m (draining south) and 38.05m AOD (draining north). Manhole cover 4402 in Martineau is at 38.1m AOD and in Barber close manhole cover 3452 is at 38.15m AOD. The Applicant’s “adoptable” manhole is proposed at 39.00m AOD – half a metre higher than close-by School Road manhole 5302 at 38.53m AOD. The Applicant’s “adoptable manhole on Orchard Road side of the proposed development is specified at 39.60m AOD – a full 1.5m above the general “Sawpit” manhole level. Hence when sewers in the Sawpit area back-up due to overloading it will be existing residents that experience the additional sewage surcharging of Willowmead Fields development sewage first (as in 2014 but much more of it?).

Additionally, during pluvial surface water flooding, displaced surface water from the new Willowmead development will leak into these lower “Sawpit” foul sewer manholes to be pumped via the Thames Water Sawpit sub-pumping station into Hurst’s main A321 sewer, probably emerging as sewer “surcharging” in Hogmoor Lane (photographed both in the recent S-19 flood report and separately by A A Butler (right)).

This surcharging will happen slowly by gravity or faster if pumped exiting the Hogmoor foul sewer cover near the 37.5m AOD contour, the close-by sewer manhole 7902 in Broadwater Lane (A321) being slightly higher at 37.73m AOD, but both manholes significantly lower relative to Willowmead.



Clearly, with Hurst’s sewer capacity already exceeded at times, Thames Water (who claim to have no record of sewer surcharging in Hurst) need to fully understand and agree with what is being proposed by the Applicant and its likely effect on others who will feel the far-reaching impact of the Willowmead development across Hurst, particularly from the known, witnessed sewer surcharging in Hogmoor Lane. With these associated unpleasant issues already experienced of sewage and leachate contamination flowing down Hogmoor Lane, unexpected contamination issues are raised in Planning Inspector’s Paragraph (97), but these linked offsite sewer issues are apparently not addressed at all by the Applicant, WBC or Thames Water.

Again, why did the archaeologists not state accurately “[The site mostly lies at a height of circa 39m AOD, rising to over 39.5m AOD towards Vine cottage, and with a lowest point approaching 38.5m AOD near Willowmead](#)”?

(2) Archaeologists' comments on the hydraulics of the trenches “South field more affected by groundwater” help inform where new realistic “winter/spring” infiltration test pits should be dug:

Trench 1 (Figs 2, 3 and 6: Pls 1, 5 to 8) No archaeological comments are made regarding hydraulics in this trench but nearest to the camera the Topographical Report site level was measured at 39.57 AOD, the highest eastern part of the site, and the highest, driest location the Applicant chose for one of their four selected “summer-conditions” infiltration test pits (INFL4A). Despite relatively low rainfall this year, standing water is visible in the shallow trench as it slopes down west to 39m AOD.



Plate 1. Trench 1, looking West,
Scales: 2 x 1m.

Trench 3 (Figs 2, 3 and 6: Pls 10-11) “Due to the high water table, part of the trench was constantly flooded and operating in it proved difficult.”

Trench 4 (Figs 2 and 6) “The SE half of the trench was more wet than the NW part. In general, the southern field was much more affected by groundwater than the northern field.”

Trench 6 (Figs 2 and 6: PI 2) The Archaeologists have made no comment on the hydraulics of this trench, but considering the relatively low rainfall in Hurst this year 2026, the presence of water very close to the surface hints at the sheer amount of retained water which will be displaced by the proposed relatively dense impermeable house foundations and surrounding paving. This water-filled shallow trench lies at roughly 39m AOD in the centre of the “south” field. However lengthy and complex the Applicant’s infiltration calculations, increasing infiltration on this site (as elsewhere in Hurst) will clearly be difficult.



Plate 2. Trench 6, looking North-East,
Scales: 2 x 1m.

Trench 8 (Figs 2, 5 and 6: Pls 13-14) “Initially hand dug for the first 0.40m, the water influx was too rapid to allow digging by hand... Even using the machine, water was coming in too fast due to high water table and the soil being sandy, the sides collapsed quickly. The bottom of the ditch 18 was thus not reached...” Containing side by side ditches 18 and 19 and containing ditch 15 (which continued south in Trench 7 (slot 11) and on through Trench 1 (slot 14), was this an earlier buried drainage ditch running south across site towards Orchard Road? Are the archaeologists able to identify this feature as perhaps not only an earlier boundary but as a possible earlier drainage ditch? Or was identifying historic drainage features specifically excluded from the Archaeological Contractor’s brief?



Plate 14. Ditch 15, Trench 8, looking South-East,
Scales: 1m and 0.5m.

The March 2025 GOV.UK SWFR maps are now absurdly inaccurate and misleading but still illustrate Hurst Parish Council's point that it is properties below the level of, and around the site that will be at increased flood risk; not the Willowmeads Fields site itself. The "default" once in 30 years GOV>UK Flood map for planning for surface water flooding wrongly and optimistically predicts minimal flooding both on and around site (see screenshot below left). The once in 1000 years surface water flooding predicted by GOV.UK gives a better but still reduced extent of flooding to that now regularly experienced in Hurst (see screenshot below centre). Compare the picture taken of Willowmead Fields flooding in the direction of Trench 11, taken the day after peak flooding in April 2023 with GOV.UK's once in 1000 years prediction and it can be seen actual recent historic pluvial flooding is more extensive than the official absurdly rare GOV.UK prediction (blue patches above and extending into "Willowmead" (below centre)). It is hoped WBC will take note of this site's actual flood history.



From the dig description provided, would not the north end of Trench 8 be an excellent location to dig a new "winter-spring" drainage infiltration test pit for more relevant drainage and infiltration data to use to meet The Planning Inspectorate's Condition (9)?

Trench 8 is located to the north of the south Willowmead field, close to both the School and the neighbouring Ordnance Survey "marshy" area (potential PLWS) adjoining Vine Cottage (ie: near the site corner below the area annotated GOV.UK flood mapping as St Nicholas Hurst C of E Primary School). Note the selective, non-representative "summer-conditions" test pits used for the Applicant's drainage report do not cover either this area with groundwater influx or the flooded area photographed in 2023 close to Willowmead (see below).

Trench 11 (Figs 2, 4 and 7; Pls 4 and 15) Shallow Trench 11 is photographed in Plate 4 (below



right)



Plate 4. Trench 11, looking South-East,
Scales: 2 x 1m.

Trench 11 is pictured in a similar view to the flooded area photographed in April 2023 close to Willowmead's north boundary fence (above left). Again, would not this location close to Willowmead fence be another good place to dig a representative drainage infiltration test pit to balance the results obtained from the four "summer-conditions" relatively dry pits selectively presented in the Applicant's original drainage report (see screenshot right above INFL1A, INFL2A, INFL3A, and INFL4A).

(3) When 80% of the Willowmead Fields is replaced by concrete house foundations and surrounding paving, where will pluvial surface water be displaced?

(3.1) There are no existing swales or ditches: With the Sawpit "Little Acre" development, infiltration (although justified by pseudo-technical but misleading report) did not work and surface water drainage is now simply to the nearest roadside ditch. As has been explained many times, the remains of the "Hatchgate Ditch" system in the Sawpit and Lodge Road area are now cut off and provide only swale or flood compensation capacity rather than any onward flow.

By now WBC should be well aware there is no natural drainage to the north and west of Hurst to the River Loddon due to the creation of Hurst Landfill, where 2 million tonnes of general waste now cover 50ha of previous floodplain and removed any EA Main Rivers/ditches which existed in this area. Hence WBC's decision to allow the Little Acre development to drain into the closed Sawpit system has already added to local surface water pluvial flood risk for neighbours. The only natural way surface water can currently drain from this area is south via the surface along Lodge Road (the area labelled "Issues" on GOV.UK Flood maps for planning) and then east around the soggy bottom of Church Hill. If say, a surface water drainage pipe from the Willowmeads Field site were connected to the only adjoining ditch in Orchard Road, not only is this ditch now severely obstructed at Willowmead (see screenshot right), it would be draining into exactly the same closed, defunct Hatchgate Ditch system as Sawpit's Little Acre development and put many lower lying properties at increased risk of flooding – not to mention what Orchard Road will look like!



(3.2) Surface water displaced onto School road is likely to increase deep pluvial flooding in Tape Lane:

Pictured (right looking north and south) is deep surface water flooding in Tape Lane in April 2023 affecting safe access to Tape Lane/Barker Court. Not indicated on the Applicant's resubmitted Flood Exceedance Plan, this is a lower nearby location where surface water displaced from



the proposed Willowmead development will quickly end up. The only way this flooding can disperse is by infiltration or leaking into foul sewer manhole covers such as the one in the foreground – possibly 6701 at 38.38m AOD (if not



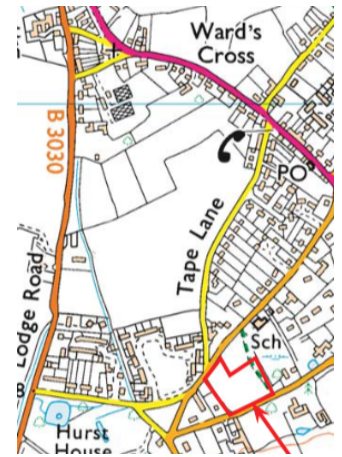
6701 will be nearby). From there any surface water leaking into the sewer will drain by gravity to Sawpit sub-pumping station to be pumped back up via Lodge Road towards the main A321 sewer and Hogmoor Lane (in the distance left photo) together with normal foul sewage and pumped leachate from Hurst Landfill.



The seriously flooded Tape Lane junction is shown above in the dry in screenshots of two Google Streetview photos – before WBC’s redevelopment and after. No doubt a pseudo-technical “smoke and mirrors” report is on file that shows the bigger houses, more dense development, the removal of trees, the substantial paving over of “green” front gardens and the elimination of the roadside grass verge, is predicted on paper to increase pluvial “infiltration” and reduce flooding. The evidence of subsequent 2023 flooding indicates what seems more obvious to anyone with common sense, that dense building and paving over green spaces increases the flood risk. If the Willowmead development goes ahead as currently proposed with no onsite retention and no alternative offsite drainage disposal scheme, the residents of Tape Lane will experience worse seasonal surface water flooding than that photographed in 2023. It is hoped WBC are improving their knowledge and understanding of Hurst’s unique, largely man-made (as in the example above) pluvial flooding problems which are hopelessly under predicted by GOV.UK Flood maps for planning.

(3.3) With a view to reviewing to improve, the Tape Lane flooding pictured may not be entirely surface water run-off. Further along Tape Lane into the flood northwards and normally draining north, sewer surcharging from manhole 7805 at 38.05m AOD, reverse flow could be feeding this flooding from anything that gets into the main A321 sewer (including in future additional Willowmead sewage and surface water). With the Broadwater pumping station capacity exceeded, discharging or surcharging like the Hogmoor manhole cover from the main A321 overloaded sewer - but not as dramatic fountains, instead seeping out unseen deep below the muddy water (Tape Lane photo above right). To gain better understanding of what is going on, next time there is similar Tape Lane flooding, would it not be worth WBC as LLFA sampling this flooding above manhole 7805 and testing the sample not just for sewage but also for leachate (cyanide, copper and lead content)?

(3.4) Use of inaccurate and out-of-date core data: The point has been made many many times that a tremendous amount of time is being wasted due to the use of inaccurate core data involving OS mapping, EA non-existent on-line rivers, WBC's completely misleading character area descriptions of Hurst etc. It is just sad and depressing yet again to see the Archaeological Evaluation sloppily using a topographically misleading out-of-date map of Hurst to show the Willowmead Fields site location. The OS Map used does not show or annotate:



- The 40m AOD contours of the general waste landfill hills.
- The 2m tonnes 50ha of waste as “landfill”
- The Landfill perimeter ditch: the most prominent feature on the LiDAR map.
- The completed developments at Nursery Gardens Whistley Green, and Little Acre at Sawpit

One detail OS do get right is the marshy area above Vine Cottage below “Sch” adjacent to the site. Perhaps a minor point for the Archaeological Evaluation (an inaccurate current map) but wrong key data on file in WBC's core documents is a major issue causing unnecessary misunderstanding and a huge waste of time – How often does one have to point out there is no EA Main River draining to the River Loddon to the north and west of Hurst, although this nonsense is still written into WBC's SFRA and other documents. Even if we can't get OS and EA to change, surely WBC should be able to quickly correct their core documents? See Addendum (5).

(4) Meaningful technical input and consent is required from Thames Water and affected Third Parties: Other than one limited sewer map the Applicant has presented no evidence of communications with Thames water to confirm that they are prepared to accept discharge of sewage and surface water from the proposed development. See (3.1) of my previous comments highlighting the need for accurate technical information to be requested regarding peak breakfast time sewage flows, sub-pumping station pump heads/ capacities, sewer maximum capacities and pumping station tank ullage in the event of electrical power failure etc. Hurst residents likely to be seriously affected, dwelling in the low lying “Sawpit” arm of Hurst's reversed “C” pattern of development deserve to know more. Specifically the Planning Inspector requires: [“Where surface water cannot be infiltrated but requires disposal off site, evidence of consent to discharge/connect through third party land or to their network/system/watercourse must be provided”](#).

(4.1) Where is the evidence that Thames Water can provide the proposed Willowmead site with sufficient clean water?

(4.2) The extra clean water supplied to the site by TW will end up in either Thames Water foul sewer system with additional sewage, or as surface water from vehicle washing, window cleaning, jet washing etc. For the foul and grey water discharge, where is the Applicant's evidence and technical back-up data to show that the existing gravity sewer system to the Sawpit sub-pumping station, and the sub-pumping station itself, have sufficient spare capacity to handle peak flows from the proposed development? And combined with the discharge of Hurst's other sub-pumping stations (Hogmoor, Wokingham Road) where is the Thames Water evidence the combined peak discharge will not exceed the capacity of the Broadcommon pumping station – resulting in increased sewer surcharging experienced within Hurst at lower level circa 38m AOD 321 main sewer manholes?

(4.3) Rain butts or not, it is inconceivable that when 80% of the waterlogged Willowmead Fields are replaced with raised house foundations displacing groundwater, and surrounding by relatively impermeable paving and tarmac, there will not be an increased rate of storm water run-off down to the neighbours in Hurst's Sawpit and Tape Lane areas. As has been pointed out repeatedly to WBC, there is currently no actual watercourse draining from Hurst's "Sawpit" area - just the now-disconnected remains of Hatchgate Ditch tributaries forming a large swale/pond. Does Condition (9) mean the Applicant needs the consent of all riparian owners adjoining these ditches with no onward flow to allow for the increased Willowmead pluvial storm surface water discharge rate offsite for more rapid filling, overflow and resulting flooding of this remaining closed Sawpit ditch system?

(5) ADDENDUM COVERING GENERAL ISSUES WITH WBC'S INACCURATE KEY DATA RELATING TO HURST'S PARTICULAR PLUVIAL FLOODING PROBLEMS; WRONG DATA DAMAGINGLY STILL CONTAINED IN WBC'S CORE DOCUMENTS SUCH AS WBC'S SFRA.

(5.1) Update and correct WBC's core documents. Provide feedback to Ordnance Survey and the Environment Agency to update and correct OS mapping and EA Main River data: It is depressing to have to respond to the same core data errors with every planning application submitted to WBC. The March 2025 roll-out of revised and erroneous GOV.UK Flood maps for planning is hard to comprehend. The GOV.UK flood map for planning zone map for Hurst shows obvious major errors – particularly regarding Dintons' Black Swan lake, Hurst Landfill hills and perimeter ditch. The default GOV.UK Flood map for planning surface water maps give a disgraceful and dangerous underestimate of pluvial flooding in Hurst – particularly for the main A321 through Hurst which is classed as flood zone 1 (no flooding from river and sea) and no pluvial flooding based on the current default once-in-30-year surface water flood map, yet has recently been impassable, coned-off and officially closed due to pluvial flooding after heavy rain; not groundwater! I feel this is an issue of official deception and lack of technical competence worthy of airing in the national press but am surprised I have not yet seen the subject raised – perhaps it only affects Hurst .

It is appreciated getting Government organisations OS and EA to change anything in their wrong core data is incredibly difficult, but would it not be possible for WBC to reasonably quickly correct the wrong data in their core documents such as the SFRA. It has been noticed that in their reports Planning Inspectors quote chunks of these documents verbatim, right or wrong. It would also help stop applicants coming up with impractical drainage schemes and pointless hydraulic studies based on rivers that don't exist. Without knowing really how to move forward I contacted Wokingham Today with random thoughts as to how to review to improve, and as Willowmead is specifically referred to, my tome (5.2) follows for information, and within in the text some relevant points are made.

(5.2) Related comments sent to Wokingham Today covering WBC's damaging SFRA errors: Hurst's absent Flood history, false description of drainage features, worrying false justification for allowing flooding, and not clearly or accurately presenting Hurst's reservoir flood risk

The two appeal results that I missed seeing in Wokingham Today are:

Application: 242067: Land between Lodge Road and Tape Lane, see also formal Appeal APP/X0360/W/25/3364304 held in August and later last year.

Application: 240583: Land north of Broadwater Lane and west of Hogmoor Lane Hurst, with informal Appeal APP/X0360/W/25/3359898 in August last year. This site, WBC designation 5SU030 is yet again subject to current Application: 260353.

With both appeals (Lodge Road 99 houses (previously 200) and Hogmoor 9 houses (likely 27)) being refused, although it was welcome and unexpected news for most Hurst residents, and clearly a loss for the developer, it did not feel like a “win” just a stay of execution as both the current Application: 260353 for Hogmoor and the recently refused Application: 252934 for land adjacent to the Lodge Road site shows; the pressure from developers to build on low-lying 37m A.O.D. land in Hurst which floods is relentless.

The efforts of WBC to make the right decisions is much appreciated, but at the same time it appears the Council Planning Officers are walking a tightrope – trying to get to the right decision but apparently not wishing to recognise or address worsening incidences of road-closing pluvial storm flooding in Hurst or the mainly man-made inadequacy of the surface water drainage system to cope with any new building. These issues involving worsening flooding and lack of drainage are also very relevant to another current Hurst Planning Application: 253074 PI decision for Willowmead Fields. Next to St Nicholas Primary School, the Planning Inspector allowed the appeal for this sensitive central Hurst site but made it conditional (Condition para 97, APP/X0360/W/24/3342812) on a suitable drainage scheme being proposed before or with reserved matters.

Without repeating a lot of information, detailed comments made by Interested Parties (including myself A A Butler) regarding these applications are available on the WBC Planning website. There are always many aspects to consider but the one that WBC Planning seem particularly reluctant to talk about or recognise is Hurst’s pluvial flooding and it causes, namely:

Lodge Road Appeal history: At the Lodge Road appeal for 200 houses a couple of years ago, WBC Planning completely accepted the developer’s flawed Flood Risk Assessment and did not raise any issues regarding flooding of the 37m A.O.D. site, or adjacent Tape Lane at appeal. Hurst Parish Council hired their own lawyer under Section 106 but were unable to discuss flooding as WBC had already excluded it as an issue.

At last year’s appeal, Mr Mark Croucher argued strongly that the site did not meet the sequential test, which is basically rejecting the site due to what is considered to be “unsafe” GOV.UK theoretical online flood risk data but without acknowledging Hurst’s real man-made surface water flooding problems. In brief, the construction of embanked reservoir Black Swan Lake at Dinton Pastures and the associated landscaping including the golf Course Hill, followed by dumping of 2 million tonnes of general waste across 50ha of River Loddon floodplain to the west of Hurst (an incomplete man-made flood barrier west of Lodge Road and Davies Street), has created a surface water containment basin for flat central Hurst and destroyed any ditches or Environment Agency Main rivers previously draining north towards Whistley Green and west directly to the River Loddon (perhaps there are legal reasons why WBC do not want to talk about these historic works which must have had Council approval)

At appeal much time was wasted discussing the efficacy of a blocked onsite culvert illegally installed 15 years ago, allegedly leading to a river which no longer exists. The developer’s Flood Risk Assessment including pointless hydraulic modelling with inappropriate boundaries and which assumed site drainage outflow to the non-existent river and suggesting a flow gauge be installed in this non-existent river. For those sitting in the Council chamber, not allowed to speak this was an insane waste of time – discussing the surface finish and flow characteristics of a

culvert, but not the “elephants in the room” the fact there is no river, or the risk of leachate contamination and gas migration from very nearby landfill.

WBC and Planning Inspectorate procedural inconsistencies were experienced which intentionally or unintentionally concealed Interested Party comments and favoured developers’ lies, particularly regarding Hurst’s reservoir flood risk (Black Swan Lake) and the acceptability of building on land which is expected to flood in the short term – the developer justifying that it is reasonable and safe for residents to occasionally expect to have to traverse through 8 inches or more of contaminated flooding.

Hogmoor history: At last year’s appeal WBC Planning yet again accepted the developer’s flawed Flood risk assessment and surface water drainage proposals, and the Inspector did not even mention flooding or the word flood in his report. Yet over 90 Hurst residents had specifically mentioned flooding as a major concern in their submitted comments together with photographs of road-closing flooding on the main A321 Broadwater Lane and Hogmoor Lane which GOV.UK flood maps designate as zone 1 – no flooding! Wokingham today has published some of these photos yet according to WBC Planning no flooding happens here!

Clearly inaccuracy in the GOV.UK flood maps for Hurst is an issue that is not apparently being recognised by WBC Planning, and of course like the “unquestioned” Post Office Horizon programme, this online “river and sea” data is currently used by developers as the gold standard for saying a site is zone 1 subject to flooding only once in 1000 years and is suitable to build on, and to question this data has perhaps not just implications for Hurst but much wider national implications – although I’ve seen nothing in the press I read regarding this dodgy data, or the dodgy Ordnance Survey topographical data, or the dodgy Environment Agency online Main River data. The errors and inconsistencies for Hurst may be unique but perhaps not?

Inaccurate core data provided by organizations one might normally trust, cannot be trusted: In my comments on various Hurst planning applications significant errors in Ordnance Survey mapping for Hurst have been highlighted, such as no contours for the landfill hills or Dinton’s Golf Course Hill, no indication of the embanked raised level of Black Swan Lake or that is 27.5ha of stored water. Similarly, the Environment Agencies Main River (think drainage ditches) online map is misleading and out of date showing rivers that don’t exist. Why is this important – because the developer’s contractor uses this official but wrong data to produce inappropriate flood risk assessments to justify building on land which floods.

Government pressure and policy: Last March 2025 GOV.UK rolled out a new suite of flood risk data including a revised set of flood maps for planning – some details of this are covered in my comments on various WBC Planning Applications including 260353 which includes screenshots of the current “rivers and sea” and “surface water” flood maps for planning. This roll-out represents a significant downgrade of flood risk which would be consistent with Government policy to make it easier for developers to override residents’ concerns regarding increasing flood risk.

I first noticed the change when I looked at my postcode flood risk which overnight changed from “Medium” to “Low risk” – which would mean we would not have to bale out our porch during a heavy thunderstorm any more.

Looking at the revised GOV.UK “default” once in 30-years surface water risk for the Hogmoor area of Hurst, your own Wokingham Today photos show how unrealistic and misleading this official ridiculously low prediction of flood risk is – and that is without considering the sewage and leachate surcharging contamination of the flooding in this area.

It is unfortunate that New Hurst Village Society have made a comment for Application: 260353 that “*Updated surface water mapping by the Environment Agency (March 2025) shows increased risk of flooding on the site.*” One can no longer access the previous data, but from the paper copies I have this is not the case; there has been no obvious change to the extent of GOV.UK “river and sea” flooding on the all-important flood zone map. What it does show is no flooding either onsite at Hogmoor 5SU030 on or on the surrounding roads – all misleadingly designated zone 1 (no flooding), despite the considerable recent flooding history showing this is not the case. Furthermore, it has been pointed out the GOV.UK flood zone map does not show Hurst Landfill perimeter ditch extending north of Old Lodge/Summerleaze site entrance. This low-lying conduit for zone 3 and Black Swan Lake reservoir flooding into central Hurst is shown on the surface water map, highlighting inconsistency in the base topographical or LiDAR data being used. If one were to consider building high up on top of the western landfill hill, this is absurdly designated flood zone 3 – so building would not be allowed. It was thought these couple of examples would be enough to demonstrate that use of this online data on its own is unsafe. But a better example is to look at how incorrect base data and crude algorithms misrepresent the flood risk situation at black Swan Lake; what is shown on GOV.UK rivers and sea “flood map for planning” is clearly nonsense.

This Government-backed downgrade of flood risk needs to be exposed for what it is - coupled with ominous developers’ arguments that it is ok to build on land which floods it is clearly intended to aid planning approvals, but with expensive consequences for the future. With one in 13 new homes built in flood risk areas in the decade up to 2022, and with that figure now thought to be one in nine, and with this GOV.UK unjustified downgrading of official online flood risk data in March 2025, should not Hurst’s council tax payers expect WBC Planning to seriously address the issue of worsening largely man-made pluvial surface water flooding in Hurst, contamination risks, and the potential costs of approval of new build approval on low lying sites that are known to flood and with no offsite natural surface water drainage more seriously?

I have personally contacted OS and EA to try and get inaccurate core data changed but seemingly without any success – OS do claim to have made a site visit to Hurst’s Lodge Road area, and it can be seen the flood map is now marked with “Issues”. However, WBC as LLFA should have the local knowledge and at least be able to put their house in order starting with properly recording Hurst’s actual flooding history and correcting incorrect core data descriptions. A couple of “for instance” examples follow (with apologies for repetition):

WBC failure to either acknowledge or properly record Hurst’s “Flood history” – something that is entirely within WBC’s power to action - now.

Importantly for Hurst’s residents, Hurst’s actual regular recent flooding history which should concern WBC as LLFA with respect to WBC Planning decisions, is not appropriately or accurately recorded in WBC’s core documentation. For instance, as covered in Wokingham Today photographs and reports such as that showing Mr Frank Whittaker, see screenshot (right) Wokingham Today 5 Apr 2023, trying his luck in Hogmoor Lane Hurst.

Making light of a situation but according to “2025” GOV.UK Flood risk map for “planning”, this section of road is designated zone 1 - free from any flood risk. And it is this proven-to-be-false (in Hurst) dodgy GOV.UK information



Gone fishing - Frank Whittaker tries his luck in Hogmoor Lane Hurst

that developers use to claim a site is flood zone 1, flooding only once in 1000 years to justify building on land which floods. In practice this means raising the new-build land causing increased flood risk and actual flooding for lower-lying neighbours. The “water” Mr Whittaker is sitting in will have contained sewage and leachate surcharging from the upstream manhole near A321 junction.

Nearby Broadwater Lane, the main A321 route through Hurst between Twyford to Wokingham has also been similarly pictured closed due to flooding, with both roads bordering a potential low-lying 37m AOD building site WBC designation 5SU030, the subject of a Planning Appeal last year where flooding was not even raised as an issue by either WBC or the Inspectorate – hence the many similar comments made regarding the current Application: 260353 for this same site.

As an example of how inadequate for sensible planning WBC’s current 2023 Strategic Flood Risk Assessment for Hurst’s Flood History actually is, see the screenshot below:

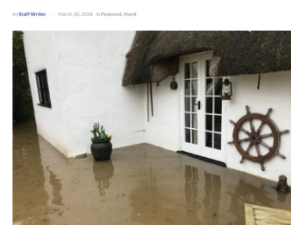
Flood history	The Environment Agency’s historic flooding and recorded flood outline datasets show that 1.1ha of the northeast side of the site is within the historic flood map and the recorded flood outline dataset. Historic flooding records provided by Wokingham Borough Council did not show any records 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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Nothing is mentioned after 2013! In 2014 there was flooding that completely cut off Hurst for residents using normal cars. Associated with this flooding were sewage issues with Portaloos needed in Hurst’s low-lying Sawpit area and sewage contamination in the car park of the Elephant and Castle in Whistley Green – a belated flood report was produced in 2016; why is this not mentioned in the official “Flood history”?

Sandford Lane in Hurst (not Woodley!) is regularly flooded and closed. A WBC flood report was produced in 2016 but was a complete waste of £18k? as it failed to mention the old weir in the east (Hurst) bank of the River Loddon which deliberately floods Sandford/Lavell’s Lakes and Sandford Lane – a flood zone 3b area. Why is this Sandford Lane flood report, although deficient, not included in Hurst’s “Flood history”. The screenshot (right) shows the weir upstream of Sandford Mill in the Hurst bank of the River Loddon. WBC as LLFA should have known about this – why Sandford Lane in Hurst regularly floods; it should be no surprise as it is in a flood zone 3b and deliberate!



More recently a WBC S-19 flood report was produced including flooding pictured in Wokingham Today at White Rose Cottage (close to, and at increased flood risk from the 5SU030 site), also subject to sewer surcharging pictured in Hogmoor Lane (both sewage and waste leachate heading untreated to the River Thames). This report was welcome but did itself no credibility favours by stating “*the River Loddon flows south, east of Wokingham*” instead of north, west of Hurst! Why is this important WBC S-19 report not highlighted in WBC’s SFRA “Flood history”? Also, WBC, as LLFA must improve accuracy of content... I’m sure there are Hurst locals prepared to help.



Surely, as a matter of urgency WBC-commissioned flood reports for Hurst must be included in WBC’s SFRA “Flood history”? But as Wokingham Today photos show, these few actual reports don’t begin to cover actual regular nuisance flooding within central Hurst such as the closure of Church Hill near Lodge Road last year (the driest spring for 69 years) and the year before, and closure of the main A321 fronting the 5SU030 site, see screenshot (right) of again what dodgy “2025” GOV.UK data designates as a road which does not flood. **As a priority, is an update to Hurst’s official “Flood history” by Wokingham Borough council not long overdue and urgently required to avoid wasting everyone’s time on not only inconsiderate, but with no practical drainage solutions in sight, potentially very harmful development proposals affecting existing residents? Actual data should be accurate and available to override dodgy virtual GOV.UK data.**



The next screenshot from WBC’s 2023 SFRA for 5SU030 “Existing drainage features mentions unnamed drains - which next to Lodge Road will be The Hatchgate ditch or Whistley Green Ditch. These ditches no longer exist for onward drainage and definitely don’t flow north or join the River Loddon (all previous ditches in this area have been buried by waste landfill – only the new landfill perimeter/segregation ditch exists; it is not a general drainage ditch). It is this WBC core misinformation a Planning Inspector uses and quotes verbatim whatever Hurst residents or other Interested Parties may point out, which is why it is so important it is corrected as soon as possible to save masses of wasted time and wrong decisions.

The two drains to the east which now also carry all drainage from the west of Hurst are the Green Man stream and the Stowe stream (now annotated Kayers Brook on GOV.UK flood risk for planning maps) – the use of a different or misspelt name does not help.

	northern boundary, which is an existing field boundary.
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.

WBC should be able to quickly correct the errors in this description to make it clear for Applications such as 242067, 252934 and 253074 that there are no drains north to the River Loddon. How often do we have to point out “there is no river”.

The next screenshot also from WBC’s 2023 SFRA for 5SU030 covers flooding depth. Interesting as according to GOV.UK flood maps for planning as the zone 1 A321 doesn’t flood? To state that

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. For the 1% AEP plus 40% climate change scenario, access to the site using Hogmoor Lane, connected to Poplar Lane, will be very difficult as maximum water depths reach 1.13m and water velocities reach 0.90m/s with a maximum hazard classification of 'Danger for most'. Access to the
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A321 flood depths do not exceed 0.30m is not consistent with residents’ reports or the earlier screenshot with the flooded road coned-off with road closed sign. As an engineer I hate to think what damage is being done to vehicles as they try to pass through this flooding, particularly emission control system Oxygen sensors exhaust-mounted which need to work above 400 degrees C and have an output of less than 1 Volt.

This warped thinking would be consistent with a government policy to build now and load extra future costs on to others and of course does not begin to consider the safety aspects, particularly for the old and young. The pavements in Hurst are narrow and uneven enough, let alone when covered with muddy contaminated floodwater. **Any WBC risk analysis surely has to be much more far reaching to justify building on land which is known to regularly flood, and even more so where sewer surcharging can be expected which also contains waste landfill leachate pumped into Hurst’s sewer by Summerleaze (pumped biosolids discharge pipe with cyanide, lead and copper compounds joins Hurst sewer at Manhole 2801 Lodge road).**

Again, the screenshot below is from WBC core 2023 SFRA data and covers “Reservoir” flood risk. This again makes interesting reading as the 5SU030 site may well be at risk from Bearwood Lake reservoir and Woodley’s South Lake Reservoir, but why is the much larger Dinton pastures 300,000 cubic metres of stored water not mentioned with its direct path via Lea Farm and the landfill perimeter ditch into central Hurst. Typically, developers avoid disclosing this flood risk by not mentioning it or devious distraction tactics such as typically substituting a random map of somewhere else in their FRA – recent examples Radlett Herts and Esher Surrey for Lodge Road and Hogmoor developers’ FRAs.

	surface water flow path in the 0.1% AEP scenario.
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.
	The AStGWF dataset suggests that the entire site has greater than 75%

The wet day reservoir flood risk map shows flooding impinging on Hurst from the west through the “Sandford Gap” via Lea farm and from the north via Whistley Green impacting the 5SU030 site from the northwest. **There is quite a lot for WBC to check here:**

Is the flood risk correct, has too small a volume been used to assess the black Swan Lake risk?

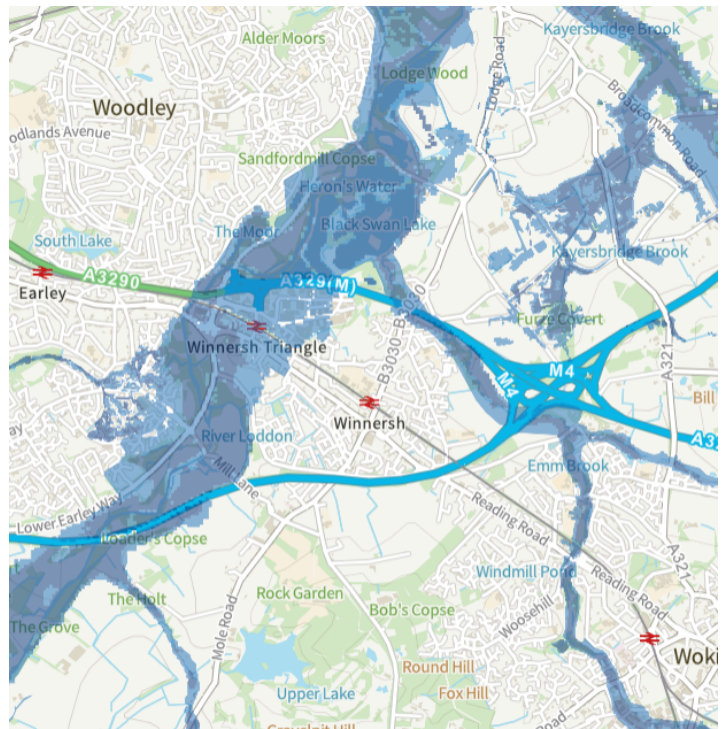
Does not the SFRA 5SU030 text need to be altered as the stoplog weir at the northeast of Black Swan Lake is clearly a lot nearer Hurst than Bearwood?

Interestingly the islands and features around Black Swan Lake, including the embankment path 2m above the Emm Brook correctly stand proud above the surface on this map – which they don't on the GOV.UK rivers and sea flood zone map where the whole area is incorrectly shown flooded (indicating incorrect base topographical data is being used). See screenshot below, Black Swan Lake is already flooded above the zone 3 flood level; even if the adjacent Emm Brook and surrounding land is flooded to a depth of 1m the embanked surrounding features will still be 1m above the flooding. The GOV.UK flood map for planning also shows the relative locations of South Lake and Bearwood (Upper Lake) reservoirs. The absurd strip of flood zone 3 across the western landfill hill can also be seen on this screenshot.



The screenshot also indicates the pluvial surface water trapment triangle created by the destruction and building-up of flood plain west of Hurst. With the higher land of Haines Hill to the east and Ashridge to the south, the only way left for surface water to drain from Hurst is via what is labelled on the flood map as Kayersbridge Brook – better known in Hurst as The Green Man and Stowe streams.

WBC may have much more important planning issues to address than those for a few council taxpayers in Hurst, but a relatively small amount of time spent correcting core data could save massive amounts of Council time spent dealing with planning applications which could not be sensibly made in the first place were Hurst's flooding history and key core data records correct.



A A Butler 15/04/2026