

SUMMARY and OVERVIEW 28/08/2025

The unrealistic scheme suggested for surface water drainage from this relatively huge development – locally raising greenfield farmland within central Hurst's low-lying flood containment basin, significantly increasing neighbouring flood risk, and discharging to a virtual EA Main River which does not exist - is just not feasible and its approval would surely be irresponsible.

This core data dilemma is graphically indicated on the Appellant's Figure 2-3 showing the man-made drainage-obstructing Hurst Landfill hills immediately west of the site, now superimposed over virtual reality EA Main Rivers that no longer exist - the two features cannot exist together.

2.2 The Catchment

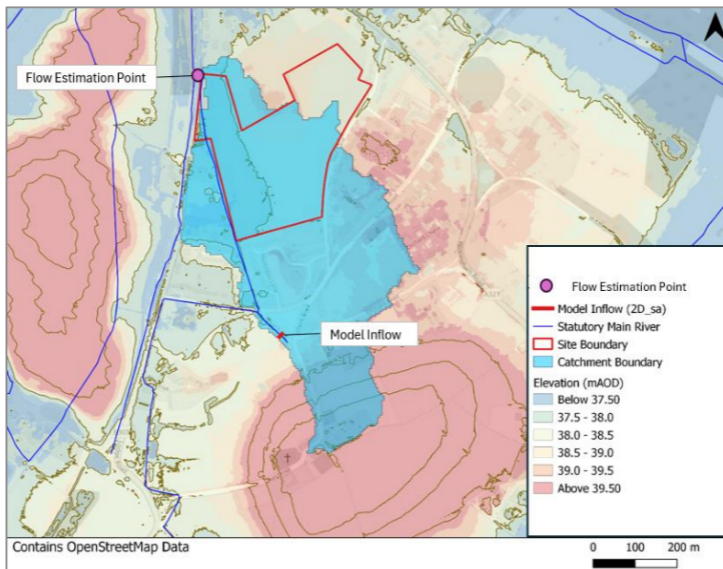
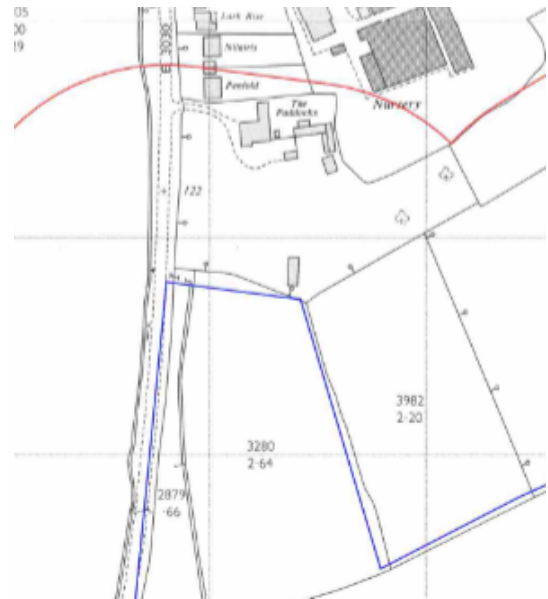


Figure 2-3 Location Plan Showing Statutory Main Rivers, Subject Catchment Area, Model Inflow Location and Site Boundary

North site entrance OS 1967 and now defunct Lodge Road Hatchgate Ditch



With no “unnamed tributary of the River

Loddon” now to accept site surface water drainage, and no discharge possible at the key hydraulic modelling boundary condition “*Flow Estimation Point*” – all the Appellant's submitted modelling becomes meaningless. The figure also graphically highlights serious problems with GOV.UK/EA/OS core data:

- For Hurst, OS Maps are particularly inaccurate with key relevant features, including landfill hills, stored water and active waterways – either not shown or not annotated.
- The online EA Main River database – largely matching pre-landfill 1967 OS Mapping - requires very urgent update to avoid wrong decisions being made in ignorance - based on seriously misleading information provided by normally respected official sources.

For now, surface water drainage from this site will continue its tortuous route first south anti-clockwise around Church Hill, then east and north – exacerbating reported S-19 flooding at Keyers Bridge and Hogmoor - before draining back northwest via the Green Man (Hogmoor) and Stowe (Broadwater) ditches to the Twyford Brook (ditches visible top right Figure 2-3).

Would it not be prudent for all to delay approval of all major building within the trapped Hurst Terrace C2/I4 low-lying, flat, pluvial containment basin, until the drastically changed drainage patterns within this area are further investigated by LLFA and properly modelled as a whole?

A A Butler, Cranford Dr, Hurst, READING 28/08/2025

(1) THERE IS NO RIVER – OFF SITE NATURAL DRAINAGE NORTH AND EAST IS NOT AN OPTION:

(1) There is no “*unnamed tributary of the River Loddon*” west of Lodge Road able to accept site surface water draining north and west directly to the River Loddon. Hurst Landfill contamination segregation ditch is now the only waterway to be found west of Lodge Road

(1.1) The conceptual design for site surface water drainage is fundamentally flawed, proposing to discharge water northwest to computer-predicted EA Main Rivers - rivers which do not exist. Referring to the Appellant's LVIA Figure 1 – Site Location Plan submitted 12/08/2024, the site between Lodge Road and Tape Lane annotated in red on 6 ¼” Ordnance Survey Map - the area west of the site and Lodge Road B3030 annotated as “Whistley Park”, shows no rivers, waterways, or ditches able to accept the Appellant's proposed surface water drainage northwest towards the River Loddon.

(1.2) FRA Rev06 7.6 “*Proposed Surface Water Drainage Strategy*” states, “*A manhole and pipe system shall then discharge to the southern drainage network before ultimately discharging to the onsite watercourse located along the western boundary.*” - and nothing more. According to this incomplete strategy statement, nothing is defined in writing with respect to where or how surface water is discharged off-site elsewhere - although a culvert from the onsite Hatchgate Ditch allegedly connecting with a non-existent EA Main River, is unfortunately being discussed at length as a key issue, instead of the complete absence of the assumed river connection.

(1.3) Hurst Landfill segregation ditch west of site still appears to have been mistaken for EA Main River – viz: latest FRA Rev06 para 2.2: “*An unnamed watercourse is location to the west of Lodge Road and appears to flow in a northerly direction*”. The normally fairly stagnant segregation ditch is not EA Main River and is definitely not suitable for the Appellant's site drainage discharge.

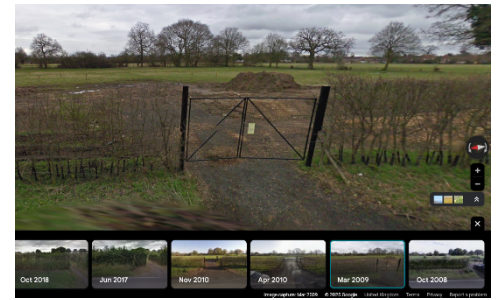
The leachate-contamination segregation ditch pictured in the Appellant's “Walkover survey site photos” (right) is located on Summerleaze's private land, part of the waste landfill, and drains south to Lea Farm leachate treatment plant and gas flare compound. The same Rev06 FRA Site Location Plan Figure 1-1, shows no rivers or ditches west of Lodge Road but does show the Appellant's on-site truncated and blocked section of Hatchgate Ditch (now swale) which no longer flows anywhere.



(2) “DECULVERTING” – RESTORING THE ONSITE OPEN DITCH/SWALE

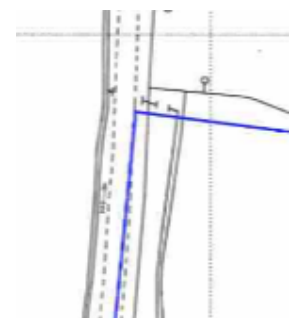
(2) Are LLFA WBC able to enforce full reinstatement of the on-site, filled-in, previously open sections of the Hatchgate Ditches, to reinstate local flood compensation, reduce seasonal ponding, and to increase bio-diversity as requested by The Environment Agency?

(2.1) Appeal Day 4, Tuesday, 19 August 2025 round table discussion - the Inspector asked the Environment Agency witness if she was aware of when the onsite ditch was “culverted”? Of those speaking - the Environment Agency, Appellant’s representatives and WBC - no one provided an answer. Google Streetview “see more dates” provides a clear answer and perhaps enough evidence for immediate WBC open ditch reinstatement and “deculverting” enforcement action. Looking east from Lodge Road, Streetview provides a photographic time-based record Oct 2008, Mar 2009, Apr 2010, documenting destruction of this onsite section of The Hatchgate Ditch.



WBC App 242067 reference for the irrefutable Streetview evidence was provided in Interested Party Planning Inspectorate Appeal representation – receipt confirmed 18/06/2025, see: [Planning Comments Comments_AndrewButler_242067_4584184.pdf](#) App Ref: 242067 Date Received 28/08/2024

(2.2) At the extreme northwest of the site, and shown on 1967 OS Map, the earlier culverted north/south site access over the ditch (as it turned sharply west towards Lodge Road), was at some time completely levelled/filled-in to create a wider joint access drive merging with “The Paddocks” access drive. Other Hurst residents may know the timing of this earlier work to modify site access near Thames Water Sewer Manhole 2801.



This history is relevant because it indicates a general position and layout of on-site culverts and open ditch in 1967 under the joint access drive with “The Paddocks” (on the right of IMG_0805 screenshot left). Other photos show Hatchgate Ditch immediately roadside west of Lodge Road is now defunct and completely filled-in, the present Landfill segregation ditch now running roughly 40m west of what was the roadside Hatchgate Ditch. Below left IMG_0803, a similar view east towards Thames Water Manhole 2801 from “Howard’s Way” footpath including the “vented” Summerlease landfill bio-solids

leachate pipe discharge manhole - giving access to the (pink) discharge isolation valve. The appellant’s own photos, immediately west of the site by Lodge Road, including in the view south in wrongly labelled Photograph 10, show the absence of any west roadside Hatchgate Ditch. The much-photographed Summerlease discharge Manhole in IMG_0801 is nothing to do with site drainage.



Photograph 10: Manhole in a northeastern direction from site



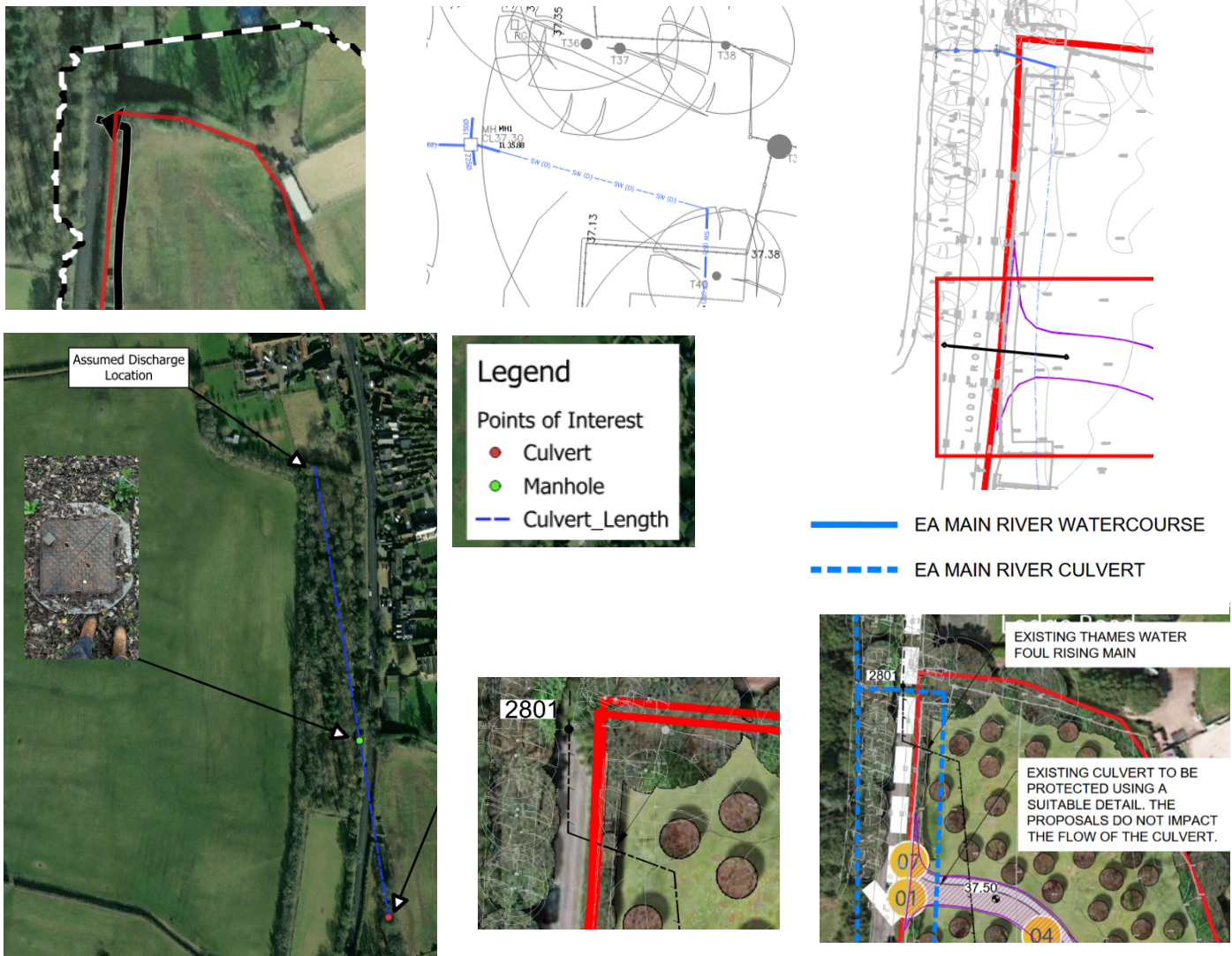
(3) THE BLOCKED OFF SITE

CULVERT DILEMMA – IMAGINARY OR REAL?

(3.1) With the Appellant's representative clearly stating at Appeal 19/08/2025 - *the route of the culvert is known, water flows through it, and CCTV shows the length of the culvert goes beyond Lodge Road*, surely it is important that both The Planning Inspector and LLFA WBC be able to review this CCTV for themselves to close out the matter.

(3.2) The Environment Agency have already expressed a view namely "*APP - Non-real time Hydraulic Model Review Land between Lodge Road and Tape Road_Hereview appendix D*" – "*The model reviewer has misinterpreted the CCTV survey of the culvert completed by A1 Wokingham Wet Waste Ltd 1st July 2025*".

(3.3) The first question for the Appellant is which of the many culvert suggestions submitted 15/08/2025 is the one used for the CCTV survey? Viz:



We are provided with options showing a foolhardy (blue) direct connection to Thames Water Manhole 2801 in Lodge Road southbound – the manhole where the Summerleaze pumped leachate and Sawpit pumped rising foul main join Hurst's sewer system under pressure. Such a connection – resulting in sewage and leachate discharging on site – would never be allowed. Another option annotated with blue broken lines (EA MAIN RIVER CULVERT) crosses near Manhole 2801 and joins a north/south culvert in a random position on the opposite side of Lodge Road. Another option - the hydraulic modelling boundary, and probably the most realistic option, shows a thick black line stopping and blocked at the site boundary.

The option the Appellant appears to favour is a particularly poor-quality SLR Technical Memorandum dated 8/04/2025 - now resubmitted 15/08/2025 as “[APP - C3 Site Visit Note 250320_Hurst_Drainage_Site_Note 0 appendix C](#)”.

On the first day of the Inquiry the Planning Inspector’s attention was specifically drawn to this document. As with much of the Appellant’s late submissions, this document has now been unhelpfully split up for resubmission 15/08/2025 with Appendices submitted randomly as separate documents, making it much more difficult and time-consuming to review. When reviewing this allegedly technical note, the following submissions also need to be viewed:

“[APP - C3 - Appendix D Photomontage2 appendix C](#)” - includes Photo 10 of Summerleaze Leachate Discharge Valve Manhole northwest of site

“[APP - C3 - Appendix C Culvert_Map appendix C](#)” - Shows a photomontage “deduced” route for a culvert passing through the Summerleaze manhole with a blue hatched line to an “Assumed Discharge Location”.

“[PP - C3 Appendix B Ditch_directio appendix C](#)” - A an onsite photo montage of a “predicted” “drawn-on” culvert pipe leading northwest off site.

“[APP - C3 Appendix A Site_Sketch_appendix C](#)” a perhaps less-than-professional “site survey” sketch making rather hopeful assumptions.

The SLR Technical Memorandum describes the route as follows - “[3.0 Particular Features](#)

- [3.1 Culvert beneath Access](#)
- [A concrete culvert runs from the location of the large oak tree towards the north west](#)
- [boundary of the development site was inspected \(refer to Photograph 4\). No outlet was](#)
- [found for this culvert on site, however, a deduced pathway for the culvert directly to a](#)
- [manhole \(Photograph 10\) would pass beneath/close to the proposed site access, and pass,](#)
- [with sufficient cover, beneath Lodge Road. Whilst the outfall for the culvert was not located,](#)
- [it is predicted to be at the Main River outfall to the northwest of the development site.](#)
- [Refer to Appendix B and C for the ditch and culvert alignment drawings respectively”](#)

If correct, the Summerleaze leachate discharge valve (Photograph 10) will appear on the CCTV footage at some stage which should also reveal whether the culvert is concrete, plastic, or just simply short and blocked.

It appears the personnel carrying out the site visit were not competent for this basic survey task – apparently not even first consulting beforehand either Thames Water Sewer maps or Summerleaze landfill site drawing where the detail of the sewer function and connection at Thames Water manhole 2801 is made clear.

A clear statement is needed from the Appellant confirming which of the alleged culvert routes is correct and make the CCTV survey available for a competent LLFA representative to review – or a retraction of the statement previously made that the culvert crosses Lodge Road.

(4) NO SEWAGE/FOUL DRAINAGE CONCEPTUAL DESIGN HAS EITHER BEEN SUBMITTED OR THAMES WATER AGREEMENT OBTAINED AND REBUTTALS NOT DECLARED

(4)Background: although Thames Water has a statutory duty to connect houses to the sewerage system once houses are built, it would be surely irresponsible to push ahead with this relatively huge development where absolutely no thought has been given to the consequences, and where cash-strapped Thames Water's priorities will possibly not be Hurst! Already developments approved in Hurst but not yet built, where the drainage and sewerage arrangements were not defined at approval include - Willowmead 23 dwellings (sewage to Sawpit pumping station and surface water to blocked Hatchgate ditches), Hatch Gate Farm 5 dwellings (near -37m AOD no mains sewer anywhere nearby), Nelson's Lane caravan pitches and day rooms (drainage/sewerage not mentioned), and probably soon - Land North of Hogmoor Lane 9 dwellings, but including two roads to "nowhere", so maybe possibly 27 dwellings (flooding apparently no problem and site drainage and sewerage directly linked to this Appellant's site overland and via sewers just 100m away. Who is keeping tabs on available spare sewer capacity, which developments will have priority, and which if built will have to remain unoccupied?

(4.1) The Planning Inspector Mr JP Sargent for Willowmead Appeal Ref: APP/X0360/W/24/3342812 11 October 2024 did place a sensible condition on the development *"(97) In the interests of adequate drainage, a drainage scheme should be submitted with or before the reserved matters. In the interests of public health, a condition should also be imposed addressing any unexpected contamination."* We are still waiting to see what drainage is proposed for this soggy site which currently drains surface water towards the Hatchgate Ditches and Sawpit sewer.

(4.2) The Appellant's FRA Rev 06 states – *"13.7 Foul Drainage - The proposed development will drain to the public Thames Water sewer network."* However, no agreed, feasible, conceptual foul drainage design has been submitted with FRA Rev 06, and earlier negative responses already received from Thames Water, have not been highlighted or apparently followed-up by the Appellant, FRA Rev 06 stating *"11.0 Proposed Foul Drainage - The proposed foul drainage strategy for the proposed development is to discharge the on-site foul flows to the existing Thames Water public combined sewer located in Tape Lane. As the site is relatively flat, coupled with the distance of the southern-most development area of the site, foul flows will need to be pumped to this combined sewer. A pre-development enquiry has been submitted to Thames Water to seek an agreement in principle for the proposed connection point."* With Hurst sewers already "surcharging" on occasion and in view of the "Sawpit experience" - it would be appropriate and prudent for such a relatively large development to require the Appellant to submit full conceptual design details for water supply and sewage handling – already agreed with Thames Water and WBC – before "reserved matters" are considered. Why has Thames Water's Waste and Water response 03/09/2024 App: 242067 not either been highlighted or since followed-up?

(4.3) Regarding Thames Water's water supply response 3/09/2024 was – *"Following initial investigations, Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal."* At present, there is insufficient infrastructure to provide the necessary clean water pressure for this development; how will this be handled?

(4.4) Regarding Thames Water's foul flows response –*"Comments based on the assumption that foul flows will connect to the public network via gravity."* – The Appellant's design needing to pump foul flows from a low, near-37m AOD site cannot meet this requirement. Pumping additional sewage into Tape Lane sewer as proposed, only 100m from where Hogmoor sewer manholes are already surcharging (spewing sewage and

leachate) near A321 - additional surcharge would be totally unacceptable and should never be approved.

(4.5) Resubmitted 15/08/2025 - “**APP - C1 - Thames Water Maps appendix C**” – the Appellant’s Thames Asset Location Search Sewer Maps were submitted 1/03/2021. At more than 4 years old, the sewer details submitted are out of date. These resubmitted Thames Water Sewer maps do not include connections from recent developments at Sawpit/Little Acre (5 dwellings) and the much more significant recent adjacent development at Nursery Gardens (17 dwellings) which have



already since taken-up spare sewer capacity. A new sewer search should be requested including the surcharging Hogmoor Lane Manhole connection close to site - within 100m north of the junction island (near A321 Manhole 7902, 37.77m AOD and on a similar level).



Surcharging here directly links the

site to S-19 flooding of white Rose Cottage beyond. This extra sewer information is needed to assess the risks of sewer connectivity flooding which the appellant has not addressed at all – in central Hurst it is not distance that matters but level! Whether it’s pumped sewage and leachate, or just floodwater, the trapped water will find its own level.

(4.6) The Thames Water response received also rules out use of Thames Water’s sewers for surface water drainage, viz: “*The application indicates that SURFACE WATER will NOT be discharged to the public network and as such Thames Water has no objection, however approval should be sought from the Lead Local Flood Authority. Should the applicant subsequently seek a*

connection to discharge surface water into the public network in the future then we would consider this to be a material change to the proposal, which would require an amendment to the application at which point we would need to review our position”

By stating that Thames Water responses are still pending, the Appellant appears to be less than transparent.

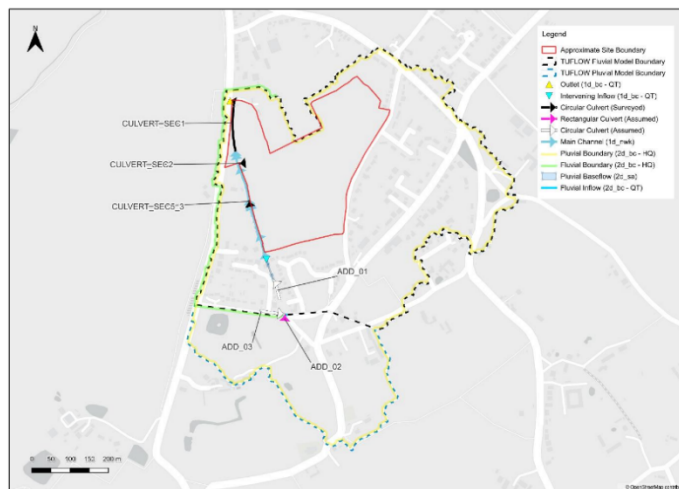
(4.7) Should drainage to the public network be considered, continued agricultural activity in Hurst is not compatible with urban surface water drainage practice using restrictive drain covers and culverts – or highly blockable “pits” as strangely used at Nursery Gardens . Hurst’s ancient open ditches, swales and ponds which once efficiently drained “contained” Hurst Terrace should be retained if at all possible. The roadside flooding compensation capacity of open ditches, allows regular debris from continued agricultural traffic not to cause rapid blockage – particularly during storm flooding. The public network drain photo (right) taken outside Hurst Village Halls perhaps illustrates a seasonal ongoing straw “littering” problem not experienced in more urban environments where straw/debris deposited continually along the kerbs will simply be washed towards, and block manholes – a particular problem in increasingly urbanized School Road. Will the new Lodge Road Access be provided with suitable traditional “Hurst” ditches or with drain grills and small culverts that frequently or permanently block?



(5) THE SUBMITTED HYDRAULIC MODELLING IS UNFORTUNATELY NOT RELEVANT

(5) The oddly suppressed, very selective hydraulic modelling boundary chosen, with a major error in a key boundary condition, will sadly only ever produce worthless results; for Hurst a much wider logical relevant area of the containment basin must be considered to produce realistic results.

Figure 2-1: 1D/2D Hydraulic Model Extent and Features



The west boundary of the model stops just short of the Summerleaze landfill segregation ditch, stops just short of the surcharging Hogmoor Lane Manhole, only includes a little bit of Church Hill, and no inflow from the impervious landfill hills, etc.

(5.1) Rebuttal of latest FRA Rev06 statement: “*13.6 Surface Water Drainage - A preliminary drainage strategy has demonstrated that runoff from the propose development can be managed using SuDS to ensure the proposed discharge to the Highgate Ditch does not increase the flood risk elsewhere.*”. Nothing of the sort has been demonstrated.

(5.2) Regarding FRA Rev06 submission 15/08/2025 as stated in (1) – there is no river to accept the assumed drainage flow to the northwest of the site.

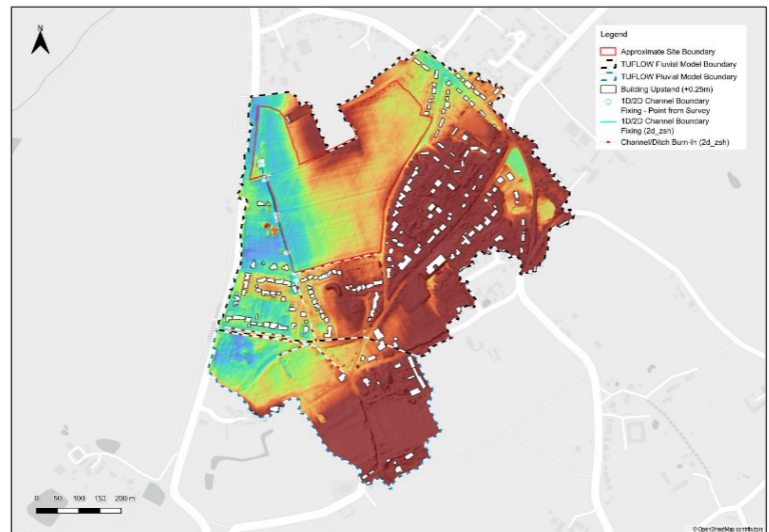
“*APP_20250811_LIT65087_Hurst_Hydrolog-appendixE* - The assumed one-dimensional discharge of any flow through “*Flow Estimation Point*” 0.3m diameter culvert is fundamentally wrong and this wrong assumption unfortunately invalidates everything else. Any flow, blocked culvert or not, will never be physically possible as there is no river into which the discharge can flow. However diligent the detailed modelling work, this demonstrates a serious lack of background information regarding the site on the modeller’s part – which also applies to the recommendation to install a flow gauge, viz:

“*Recommendations for future work: A key recommendation for further work that would improve the understanding of flood frequency estimates would be installing monitoring equipment within the catchment i.e., installing a river gauge on the unnamed watercourse.*”.

Looking at the absence of any river in the Appellant’s own photos in (2.2) clearly the modeller has not been suitably briefed by the Appellant.

(5.3) For comparison hydraulic modelling would one not expect to see a “base case”, with the site “as is”, then an “as-built” case for comparison – complete with raised dwellings and the site built-up as implied with 50,000+ cubic metres of soil, rubble, paving and concrete? If this aspect is covered by 5ha of the site being modelled by a catch-all “*urban*” factor, we need to know how this corresponds to what is actually to be built? Appellant’s LiDAR terrain “*Figure 2-2*” has a title “*Hydraulic Model Topography Changes*” but shows no changes – just the undeveloped as it is now? The purpose of the model appears to quantify “*flood risk to land proposed for residential development*” - so just a “base case” rather than the more relevant **flood risk to neighbours from the “as-built” developed raised site** – which is what Hurst residents really need to know. Where are the comparable “LiDAR-type” terrain details of the dwellings and surrounding raised developed site for meaningful modelling comparison?

Figure 2-2: Hydraulic Model Topography Changes



(5.3.1) Item 22 of the “Not agreed Conditions 19/08/2025” states “*proposed finished ground levels and finished floor levels across the site to be set at a minimum level of 38.13mAOD*” – note the word minimum above the present near 37.5mAOD seasonally waterlogged site. The Appellant’s “access-only” indicative drawings show the surface of the on-site “retention pond” at 38.0m AOD – the new pond raised more than 0.5m above the level of existing seasonal ponding on-site and relative to neighbours. A common-sense statement (or perhaps responsibility shifting disclaimer?) is made at the end of FRA para. 7.4.3 affirming Archimedes’ principle and most Hurst residents’ understanding of what will happen: “*7.4.3 Exception Test – Fluvial Flooding: Therefore, provided there is no land raising within design flood envelope without suitable compensation elsewhere, the proposed development would not increase the flood risk elsewhere by virtue of the reduction in floodplain storage or the obstruction of flood flows.*” The unanswered question is – “By how much is the near 37.5mAOD 10.68ha site to be raised – and to meet the condition, where is the 50,000+ cubic metres of suitable flood compensation elsewhere provided?” The indicative 38.0mAOD high retention pond at less than 2000 cubic metres would have negligible effect - being less than 4% of the required volume needed of flood compensation ditches, swales and ponds below 37.5mAOD – which in winter and spring, in Hurst, will be full of water anyway.

The modelling carried out and presented unfortunately involved a lot of someone’s specialist work but appears to be of no use to inform a sensible planning decision.

(5.4) In terms of the changed topography to the west of Hurst village, as a consequence of landfill and landscaping, it would be appropriate to hydraulically model the whole surface water containment basin created as a base case - to properly assess the effect on overall flood risk from proposed individual developments. A crude characterization is the Hurst

surface water “Trapment Triangle” with higher land and high flood zones on all three sides – but with three significant gaps, or boundary conditions.

(5.4.1) To the east of the Trapment Triangle is the Higher land of Haines Hill leading southeast to higher land east of Ashridge with continuous Flood Zone 3 within the containment area. The delineation of the exact modelling boundary along surrounding low ridges across Haines hill towards The Warren will need careful consideration, and won't look much like a straight line. However, the lowland gap where the Billingbear Brook feeds into the central Hurst containment area is an easily defined boundary inflow condition.



Pictured (left) as a normal babbling brook flowing west into the model, from the road bridge (centre) looking east, partially flooded, and (right) flooded, also looking east and not safely passable with the road bridge in the background with higher containment land beyond – at present, this EA Main River is not shown alongside Broadcommon Lane on OS 1 ¼” Maps (or Phillip’s Street Atlas) and the bridge road crossing not annotated as such on OS 6 ¼” Maps.

(5.4.2) To the south the modelling boundary might be defined by the M4/A329 (M) and Junction10, and/or the higher land of Ashridge. To the north of this boundary is a largely a continuous contained area of Flood Zone 2.

(5.4.3) To the west is the area which was once River Loddon floodplain, and now comprises raised man-made landscaping in Dinton Pastures to the south, 50ha of landfill hills to the north with the Sandford Lane gap in between – with continuous River Loddon Flood Zone 3 beyond and flood Zone 3b near Sandford Lane. The likely modelling boundary might run across the ridge of Dintons’ old golf course hill (with the Emm Brook beyond) and across the ridges of the three distinct landfill hills. The Sandford Gap is a significant boundary condition as it is a lowland route towards the site for not only preferential “3b” fluvial flooding from the Loddon, but also Black Swan Lake reservoir flooding leading to contaminated flooding via Lea Farm and via the landfill segregation ditch.

A significant boundary condition will be the deliberate River Loddon fluvial flooding model inflow resulting from the old weir in the east Hurst bank of the Loddon just north of Heron's



water – a heinous or perhaps inexcusable omission from WBC's "*WSP Sandford Lane Flood Investigation Report January 2016 Flood Event FIGURE 01/02*" (it is quite hard to find and hazardous to access during flooding). Pictured (left) this weir is marked on OS Maps and preferentially floods Sandford Lane in Hurst (rather than Woodley), also Sandford lake and Lavell's Lake nature reserve etc. More seriously this flooding is towards leachate treatment facilities at Lea Farm and affects the Zone 3 landfill segregation ditch just west of

Lodge Road and close to the proposed development site.

Risk of flooding from black Swan Lake reservoir - which the Appellant has failed to address at all in FRA Rev06 – is another possible boundary condition to consider for inflow at both the Sandford gap, but more so for inflow at the Whistley Green gap at the north of the Trapment Triangle. Pictured (right) with high "wet day" flood risk river levels this wood slat weir $\frac{3}{4}$ mile from site – not shown on OS Maps – is holding back around 300,000 cubic metres of water and the risk of failure or vandalism, albeit probably very low, should be addressed. WBC core data gives the weir height as up to 2m and the reservoir volume as 200,000 m³ – but with the water held over 1m higher than river level as photographed, and a lake area approaching 300,000m³, it might be prudent to review the core data being used for EA Reservoir Flood Maps for Black Swan Lake.



The other possible inflow at the Sandford Gap, but perhaps not highly significant, would be the Emm Brook, a short tributary of which leads from the weir outfall pictured above. But the significance of fluvial flooding via Sandford Gap Main River inflow, is not only that it backs-up and prevents trapped surface water escaping, but that it takes Zone 3 and reservoir flooding into central Hurst, close to the proposed site, via the leachate segregation ditch – see (5.5).

(5.4.4) Finally the outflow at the north of the Trapment Triangle to the Twyford Brook, is northeast of Whistley Green via the Green Man (Hogmoor) and Stowe (Broadwater) ditches. Aspects of this outflow boundary flow are covered in detail in WBC's S-19 Flood Report.

(5.5) FLOOD RISK AND CONTAMINATION RISK FROM LANDFILL SEGREGATION DITCH BOTH NEED TO BE PROPERLY MODELLED – GOV.UK/EA/OS MAPPING FOR FLOOD ZONES DOES NOT SHOW THE FULL NORTHERN EXTENT AND CONNECTIVITY OF THIS CRUCIAL DITCH.

(5.5) Not shown at all on Ordnance Survey mapping, and not on GOV.UK (fluvial) Flood Risk Map north of Summerleaze landfill access by Old Lodge, and mistaken for EA Main River by the Appellant - only 50m from site - the landfill segregation ditch runs parallel to, and on the opposite side of Lodge Road. Subject to fluvial, surface water and reservoir flooding from the south, and with surface flooding connectivity risk across Lodge Road – the

associated flood contamination risk must be properly assessed: *Ref: List of Recommended conditions (updated 19/08/2025) Agreed Condition (17).*

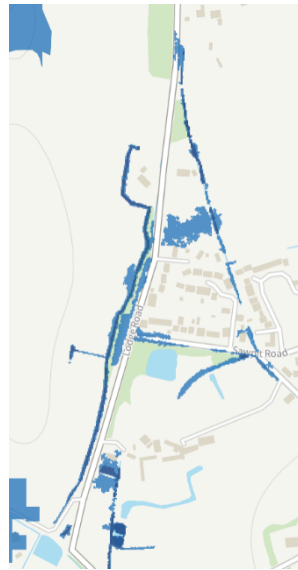
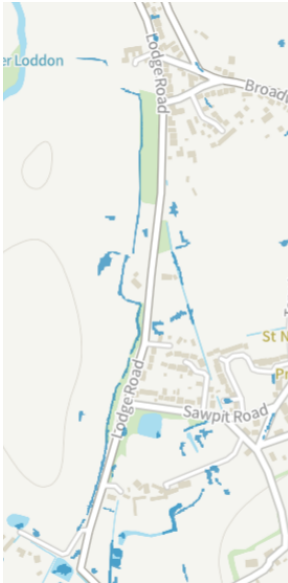
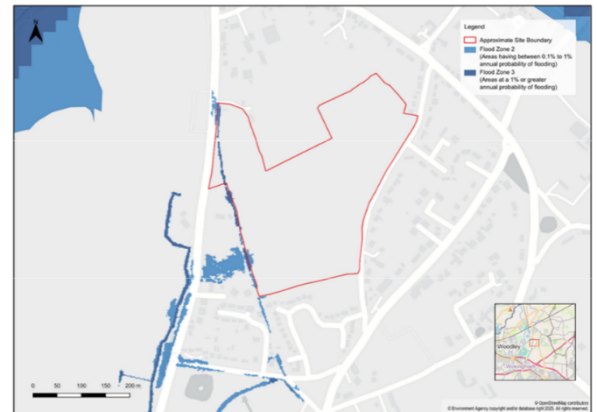


Figure 1-2: Extract of the Flood Map for Planning

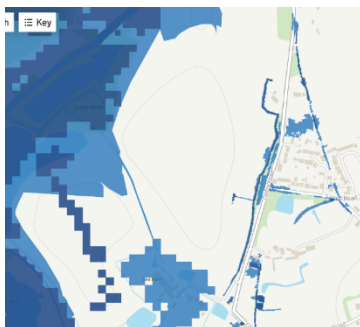


This report provides an assessment of flooding risk to the site and surrounding area and follows the Government guidance regarding development and flood risk.

Comparison of online Flood Zones (right), one without the site marked, and one with the site outlined in red – both show the ditch subject to Flood Zone 3 stopping immediately north of its detour around Old Lodge at the Summerleaze site access.

The flood map for surface water flooding (above left) on the other hand indicates the ditch continuing to run northwards beyond the Summerleaze access to its start near Whistley Farm. The reasons for these differences may be that two different LiDAR databases are being used – perhaps one data set scanned when trees were full leaf – the other in winter. But whatever the reasons for the differences, this ditch -not shown on OS and EA data – very much exists and must be included in any modelling.

(5.6) The more general issue arising is while providing useful guidance, GOV.UK Flood Risk for Planning maps are displaying obvious serious errors in detail - as in the photo (right) of the officially missing waterway. Surely knowing this, the onus should be on the Appellant to stop looking at the computer and carry out a competent site survey both in and around the site before proposing an unfeasible building project?



Shown left is the absurd designation by GOV.UK/EA/OS Flood Map for Planning of the top of the nearby landfill hill 9m up as Flood Zone 3. With two such very obvious errors within only a small area of Hurst should not this online data carry a suitable warning “*GOV.UK responses may include errors*”?



(5.7) Once a base hydraulic model has been established for the “Trapment Triangle” which matches current observed flow patterns, it can then be realistically used to sequentially look at the single and cumulative effects of building major approved and proposed projects on potentially raised low-level land within central Hurst

(6) REBUTTAL OF APPELLANT’S S-19 CLAIM *“IT IS UNLIKELY THAT RUNOFF FROM THE SITE CONTRIBUTES TO FLOODING IN THE AREA DESCRIBED IN THE S-19 REPORT.”* - THIS DEVELOPMENT WILL MATERIALLY INCREASE “S-19” FLOODING ELSEWHERE

(6.1) FRA Rev06 “3.3 Section 19 Reporting” states – *“A site visit of the Section 19 reporting was requested, and a review of these locations showed that only one (Site 1) was in closer proximity to the development site. Refer to Figure 2 for the proximity of the sites. The other two sites were more distant, and whilst these were visited, no further detail was deemed necessary, as they were not deemed to be in hydraulic connectivity”*.

This opinion, expressed in the Appellant’s poor-quality SLR Technical Memorandum dated 8/04/2025, claims that because White Rose Cottage (the subject of flooding in S-19 report) is 0.47km away, it will not be affected by additional surface water runoff from the raised Lodge Road site – based on the opinion of survey team that had not apparently consulted Thames Water sewer maps beforehand or managed to spot a missing river. Given time, floodwater will of course find its own level over the surface and via the sewers. The Appellant has not acknowledged the close direct surface water and sewer flooding connectivity of their site with the nearby near-37m AOD Hogmoor area.



The 1/04/2023 photo (left) of Tape Lane looking north immediately adjacent to the site’s east boundary on the left - shows deep flood water (over one foot) badly affecting the entrance to Barker Court and extending towards Broadwater Lane A321 and junction with Hogmoor Lane. Pictured the day after the major flooding - this deep flooding covers several manholes, like the one in the foreground, and manholes can leak.

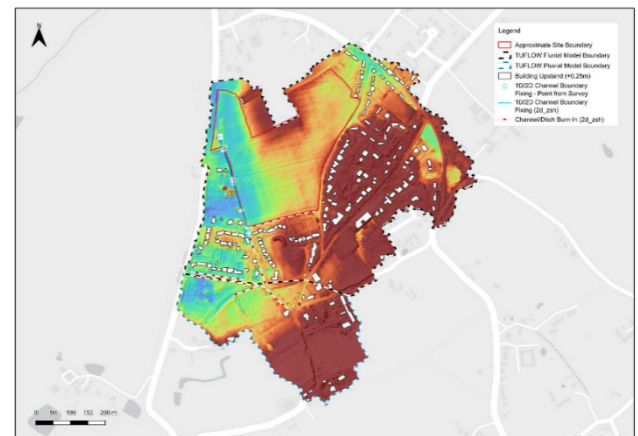
Looking in the same direction on the same day (right) , but just a little further north across A321 in Hogmoor Lane 0.1km from site, sewage/floodwater/leachate from this surcharging manhole is draining to, and adding to the subsiding flooding at S-19’s White Rose Cottage – a further 0.37km down Hogmoor Lane. This sewer flooding connectivity is also pictured in WBC’s S-19 Report – titled “Thames Water Pumping Station Ineffective”.



Wokingham Today press photos (left) taken the day before, looking along the same section of Hogmoor lane a little further on, perhaps demonstrate why sewer flooding is not always obvious – because the surcharging fountains are flooded and hidden from sight! As are Hurst’s ditches!

A photograph of a large, traditional stone house with a prominent chimney, partially obscured by trees and a wooden fence in the foreground. The house has a dark roof and white window frames. The foreground is a grassy field with a wooden fence. There are trees and a cloudy sky in the background.

A photograph showing a car driving on a road that is partially flooded with water. The car is moving away from the viewer towards a house in the background. The road surface is wet and reflective, and the surrounding area is lush with green trees and vegetation.



western arm of the “The Reversed C” village growth – will experience increased severe surface water flooding should this development go ahead.

(6.2.2) Drainage that previously drained northwest in the defunct Lodge Road north Hatchgate Ditch now begins its tortuous route south anti-clockwise around Church Hill. The photo right taken earlier this year, the driest spring for 69 years, shows a vehicle ploughing through the flooding near the increasingly soggy junction with Lodge Road/Davis Street and Lines Road. The day after this photo was taken Church Hill was closed to traffic.



(6.2.3) Pictured (right) flowing earlier this year is what could be all that is left of a functioning Hatchgate Ditch that is no longer simply a swale. Looking south towards Hatch Gate Farm entrance, this traffic-damaged roadside ditch is not marked on OS Maps but is designated EA Main River. Once perhaps the start of The Hatchgate Ditches system, the “stick and ribbon” ditch flow indicator shows flow in this remaining section of ditch is now strongly south – not north as wrongly indicated by arrows on some maps.

Hatch gate Farm entrance in the distance is where planning permission has been approved for new dwellings on yet another near 37mAOD site, and where there is no Thames Water sewer nearby. Any disruption of this “reversed” now essential drainage will have upstream consequences.



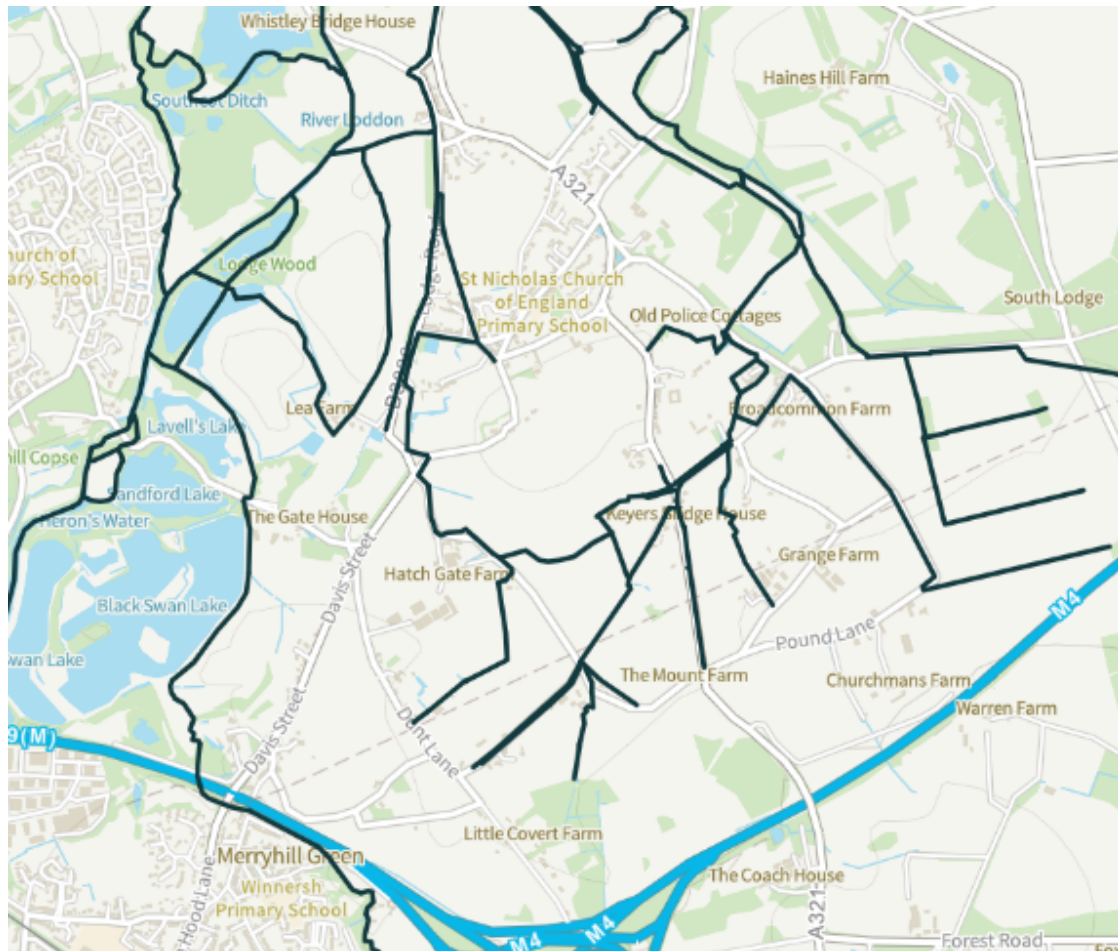
(6.2.4) looking northeast, at the opposite east end of Lines Road, at its junction with A321, with Pound Lane opposite – the turbulent flow from the ditch on the south side of Lines road crosses the road north to drain into the A321 roadside ditch towards Keyers Bridge and towards regularly flooded Islandstone Lane.

This very active roadside waterway near and opposite “The Mount Farm” - is not shown on OS 6 ¼” Mapping, and is not shown on GOV.UK/EA/OS MAIN River Maps but is clearly another

unexpected “reverse flow” contributing directly to increased “S-19” flooding at Keyers Bridge House. – adding to flows from the original ditch system already converging on Keyers Bridge. It is these changed drainage flows that need to be properly understood as a result of the historic destruction of floodplain and raising of land to the west of Hurst. The



online EA Main River Map below shows the locations of the observed new and reversed surface water drainage routes east and north across Hurst Terrace C2/I4. This map showing in black waterways that no longer exist and not showing waterways that should exist - needs very urgent update.



(7) Rebuttal of incorrect Rev06 FRA statements: “**13.5 Offsite Impacts - The proposed development will have no impact on the flood risk elsewhere.**” also, “**7.4.1 Exception Test – Surface Water (Pluvial) Flooding: as the flood risk from fluvial flooding in this area is greater than from surface water flooding, it is addressed through the consideration of the exception test for fluvial flooding at Section 7.4.3.**”

The site is defined in the FRA as fluvial (river) Flood Zone 1 – a risk of flooding once in a thousand years. The experienced risk of pluvial, normal rainstorm flooding photographed by Hurst residents every year (see example photos in (6) and many residents’ submissions), is clearly the much greater flood risk - made much worse at times such as in 2014 by surrounding fluvial flooding. Raising any part of this near 37.5mAOD flat seasonally waterlogged site is not an option without materially seriously increasing pluvial flood risk elsewhere, throughout central Hurst Terrace C2/I4. Accentuated by huge man-made topographical changes, normal storm surface water flooding is the primary flooding problem for contained, central Hurst Terrace as confirmed by Hurst Residents’ experience and many photos. Until surface water flooding and run-off on and around the site is given the top priority and sensibly addressed, the Appellant’s FRA will remain unfit-for-purpose.