

WBC Planning Application 260353 – OBJECTION (Rev 01)

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

Submitted by: A A Butler

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

Date: 7 March 2026

I wish to object based on the many reasons for previous WBC refusals to approve building on this 5SU030 site, and do hope WBC Planning maintain their position and promptly refuse this inappropriate Planning Application: 260353

(1) Summary: Surely this inappropriate “Permission in Principle”, like a pre-application, is intended to seek initial advice or guidance from the Council as to what is possible at the start of the planning process and if approved will procedurally require subsequent detailed applications? With this site 5SU030 already the subject of previous detailed planning applications and appeals, albeit “access only”, and this section of Broadwater Lane area providing valued physical and visually open space with rural vistas separating Whistley Green from Ward’s Cross, the risk of inappropriate and insensitive development harming the amenity value is high, a view already well established, and understood by WBC Planning with refusal for previous applications.

Do we really need to waste time commenting on this inappropriate application? The importance and prominence of this central Hurst site with its low, varied, characterful heritage buildings built with traditional and local materials, surely makes it unsuitable for approval of “PiP” allowing carte blanche for a developer to go ahead and build any eyesore they wish?

(2) The site fails to pass the sequential test: The proposed site location immediately northwest of Hogmoor Lane and northeast of Broadwater Lane (A321) lies within WBC designated site 5HU030, which has already been the subject of numerous refused speculative planning applications, the most recent being App: 240583 with Appeal APP/X0360/W/25/3359898 in August last year. This appeal was also dismissed, but disappointingly without either WBC Planning or the Planning Inspector addressing residents’ real concerns that the development would make existing regular flooding, drainage, and sewer surcharging problems much worse. This failure to address real flooding and drainage issues at appeal was more than disappointing especially as [Wokingham Borough Council Sequential and Exception test Wokingham Borough Local Plan Update: Proposed Submission Plan \(Regulation 19\) September 2024](#): concludes this site does not pass the sequential test, see screenshot table below:

Site	Address	Flood Zones	Flood Zone 2	FZ 3 + Higher Central CC	Risk of flooding from other sources	Conclusion	Summary of reasons for not allocating the site
5HU030	Land north of Hogmoor Lane	FZ1 FZ2 FZ3a FZ3b	8%	5%	13% of the site is at risk of surface water flooding in the 1 in 1000 year event. 100% of the site is within the highest risk category in JBA Groundwater map (groundwater is within 0.025m of the surface). 28% of the site is highlighted on the Historic Flood Map.	Does not immediately pass the sequential test and exception test required.	- Inappropriate relationship to established settlement form and pattern and landscape character. - Potential harm to a number of designated and non-designated heritage assets close by, including harm to the visual break between two historic settlements. - Site frontage covered by TPO trees. - Landscape sensitivities.

With complete acceptance by WBC Planning of the Developer's flawed FRA and impractical, inconsiderate-to-neighbours, drainage proposals for Land North of Hogmoor Application: 240583, this situation perhaps mirrors that with the earlier 2024 Lodge Road Appeal for "200 houses" when WBC Planning similarly chose not to raise, and to exclude any discussion of either increased flooding, or its man-made causes including Loddon floodplain-displacing Hurst Landfill or its associated contamination risks. At the more recent Lodge Road Appeal for "99 houses", actual real-world issues like the absence of any river for onward surface water drainage, and use of inaccurate, misleading core WBC and GOV.UK data, were insanely not addressed or even acknowledged. The lack of any discussion of Hurst's actual pluvial flooding issues, the lack of any challenge to the Appellant's KC's and Expert Witnesses' wrong statements or any technical questions to test the expert witness' actual drainage expertise from WBC Planning and legal team, and the apparent lack of any WBC representation or expert input as LLFA was both very frustrating, very disappointing, and astonishing to witness. Fortunately, WBC Planning's Mr Mark Croucher's laudable stiff defence of the Council's decision regarding failure to meet the sequential test saved the day.

Hence will WBC Planning's position, which for Lodge Road site moved in a couple of years from not allowing any discussion on real flooding issues to refusing the Lodge Road Application: 242067 based solely on GOV.UK theoretical fluvial flood risk data, be similarly repeated with site 5HU030? Had either Mr Mark Croucher or Mr Benjamin Hindle made a similar appropriate staunch case for the 5HU030 site failing the sequential test at appeal last year for Application: 240583, might we have avoided this current permission in principle application being submitted to unnecessarily waste Council time? Surely any part of a flat 37m AOD site with seasonal standing water, and which fails the sequential test is just not appropriate to even be considered for "PiP" and why was this significant issue of failing the sequential test not raised by WBC at last year's appeal?

(3) Worryingly, by fully accepting the Developer's Application: 240583 proposals and only recognising fluvial flooding as a problem, WBC failed to acknowledge at appeal that actual pluvial flooding experienced on and in the vicinity of the 5HU030 site, has been much worse than that predicted by new March 2025 roll-out GOV.UK Flood maps for Planning for both fluvial (rivers and sea) and pluvial (heavy rain). This apparent lack of acknowledgement snubs and disrespects the valid concerns highlighted by over 90 Hurst residents! Comments submitted regarding App: 240583 but applying equally to this Application: 260353 which is on the same plot. Many personal heart-felt statements already on record highlight the frequency, extent, depth, and sewage contamination of existing local flooding in surrounding roads and properties currently designated flood-free GOV.UK zone 1. Some statements recounting A321 and Hogmoor Lane flooding being impassable in wellington boots, obvious sewage

contamination, with regular sewage/landfill leachate surcharging from the Hogmoor Lane/ A321 junction sewer manhole cover. There are reports of property frontages and doors having to be sandbagged, and where a tractor stuck in the mud had to be pulled out of this proposed low 37m AOD waterlogged site.

A consistent theme in residents' comments is that the pluvial flooding problems across Hurst associated with heavy rainfall are getting worse. Reported problems with Hurst's drainage appeared in 2008, only a couple of years after 2005/6 when waste dumping stopped at Hurst Landfill and capped waste hills replaced 50ha of Loddon floodplain and drainage ditches west of Lodge Road. Reported flooding incidents then steadily increasing to include the recent "S-19" inundation at White Rose Cottage reported in Wokingham Today in March 2024, an extent of flooding which has never happened before. Within residents' statements are many "Proof of Evidence" photos of this regular, and worsening non-fluvial zone 1 pluvial flooding, as well as photos appearing in the press and online, some relevant examples copied in the screenshots below; A321 closed, and from Wokingham Today, "S-19" White Rose Cottage flooded, Hogmoor Lane outside neighbouring Apple Tree Cottage flooded Mar 2024, with off road "off-road" vehicle stuck in the ditch Hogmoor Lane.



5HU030 site frontage, and above (right) Hogmoor Lane southeast of 5HU030 site - both flood zone 1 and where Application: 260353 surface waters will drain!



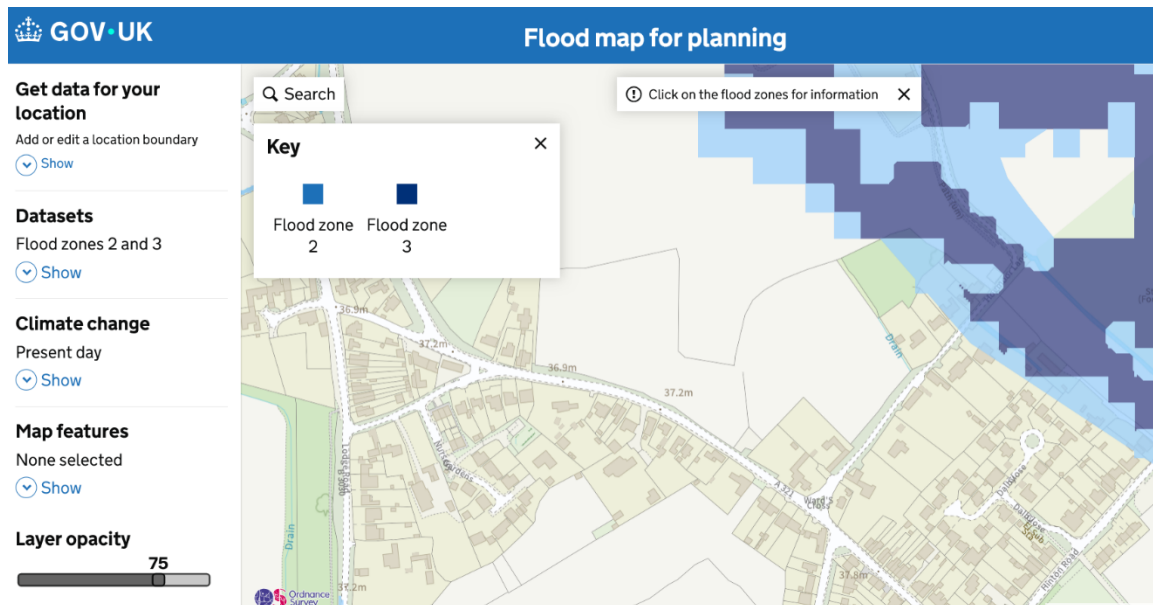
Above (left) A321 southwest of



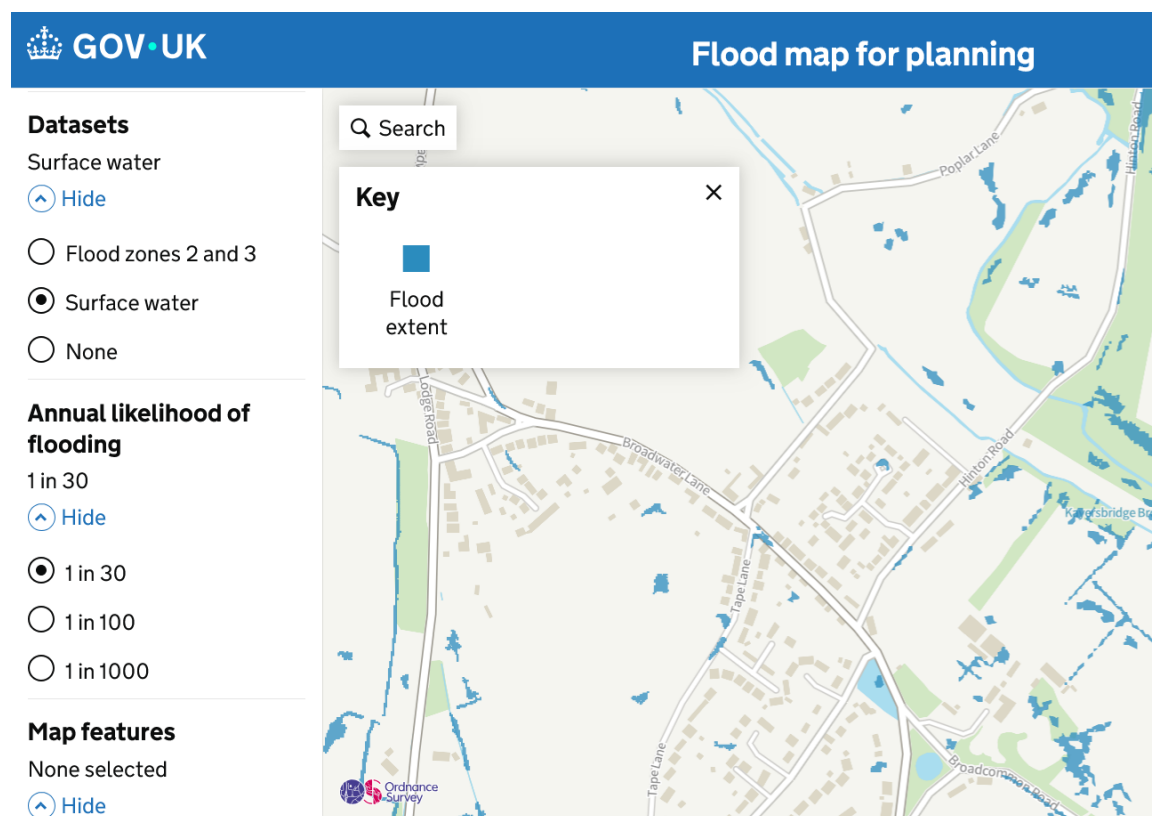
Why did Mr Tim Burnham of the Planning Inspectorate not address or consider 90+ residents' experience and real concerns regarding regular pluvial flooding as a major issue in his report APP/X0360/W/25/3359898 for Application: 240583? Did no one in authority read or look at this body of evidence – evidence a developer might present as irrefutable "Proof of Evidence"? Do WBC Planning just consider it unimportant, or as one Planning Inspector recently deemed - "of no import"?

(4) Fluvial and Pluvial GOV.UK Flood map for planning maps rolled-out in March 2025 are flawed and should be used only with due care and scepticism: In the screenshot (below), the current GOV.UK “Rivers and sea” flood map for planning shows zone 1 with absolutely no flooding on most of 5HU030 site, also zone 1 (no flooding) in surrounding Broadwater Lane/A321 or in Hogmoor Lane, the zone 1 designation extending northeast beyond Apple Tree Cottage bordering the northeast site boundary drain (by the stranded vehicle photos (1)).

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Similarly, the current “default” GOV.UK pluvial surface water flood map shows no flooding in the next 30 years next to the site in either Broadwater Lane or at all in Hogmoor/Poplar Lanes.



Neither the fluvial or pluvial GOV.UK Flood map for planning predicts the deep impassable flooding of “zone 1” reported and pictured by Hurst residents. This Government data grossly, misleadingly, and harmfully underestimates Hurst’s flood risk. The reconfigured 30 year “default” pluvial surface water flood map for Hurst is a misleading travesty and should surely

be withdrawn? Even the once in 1000 years flood map does not accurately predict the full extent of what typically in Hurst now approaches annual seasonal flooding (for example elsewhere, Church Hill was closed due to flooding last year 2025, the driest spring for 69 years, and similarly closed the year before). For more information see: [APPENDIX \(A\)\(MSWFR\) Misleading GOV.UK Surface Water Flood Risk data:](#)

The updated GOV.UK Rivers and sea flood zone map, although now locally showing a greater extent of fluvial flood risk in the Lodge Road area north of Sawpit Road*, elsewhere displays obvious serious errors, and should only be used as a guide to Hurst's actual more extensive flooding. Obvious errors include not showing flood zone 3 and zone 2 flood risk extending north, close to the west side of Lodge Road beyond Old Lodge towards Whistley Green following the Hurst Landfill perimeter ditch providing a conduit for both River Loddon fluvial flooding, also for Dinton's Black Swan Lake reservoir flooding via low-lying Sandford and Lea Farm (with associated contamination issues). The map now also absurdly shows flood zone 3 on top of the west landfill hill at 44m AOD; high risk 7m above the Hogmoor site. For more details see: [APPENDIX \(B\)\(FZGE\) GOV.UK Flood Zone Map Glitches and Errors to be Reviewed and Improved:](#)

** NHVS letter 24 Feb 2026 App: 260353 Land north of Hogmoor Lane, suggests "Updated surface water mapping by the Environment Agency (March 2025) shows increased risk of flooding on the site". This statement is not consistent with what is shown on current relevant GOV.UK Flood maps for planning, see screenshots (above) .*

Have WBC as LLFA provided feedback to GOV.UK to review and improve the fluvial and pluvial Flood maps for planning modelling and/or data for Hurst to match what happens, and if so, what is the response?

(5) Sewage and leachate contamination in increased flooding from sewer surcharging :

Poor drainage and overloaded sewer systems add to the extent of flooding and contamination around site 5HU030. The surcharging manhole cover pictured (right) is in Hogmoor Lane near its A321 junction, with Application:260353 southeast site boundary in the background. Thames Water apparently have no record of this 2023 or any sewer surcharging close to A321 adding to Hogmoor flooding (see April 2023 photo (right); the S-19 report includes a similar surcharging photo). The sewer surcharging is a likely result of combined pumped sewage from Wokingham Road, Hogmoor and Sawpit sub-pumping stations, pumped leachate from Summerleaze waste landfill, and pluvial flooding leaking into the lower sub-pumping station sewer manholes exceeding the capacity of Hurst's main A321 sewer and Broadwater (Twyford) SPS BROAP2ZZ pumping station to handle Hurst's existing foul water drainage. This sewage surcharging is heading first towards White Rose Cottage and then to the nearby Twyford Brook, which ultimately must handle all Hurst's natural surface water drainage together with untreated sewage and leachate surcharge on its way to the River Thames.



Should WBC as LLFA, or EA, or Thames Water be regularly sampling the water quality of the Kayers Bridge (Green Man) and Billingbear (Stowe) Brooks leading to Twyford Brook?

Should Summerleaze stop pumping leachate into Lodge Road sewer via Manhole 2801 during Hurst's main A321 sewer surcharging incidents?

(6) Lack of any specific verifiable house dimensions for size and location renders

sensible appraisal impossible: When viewing a WBC Planning Application site adjacent to Hurst's Townsend Pond over 20 years ago, Borough Councillor Annette Drake asked, "how big will the house be, and where will it be?" Why do WBC Planning never require an Applicant or Developer to answer these basic questions? Surely we should know the key dimensions before anything is built – intended raised finished as-built floor level, maximum roof or ridge height above finished floor level, maximum as-built depth of the house with roof included, maximum as-built width of the house with roof included, and minimum as-built distance of any part of the house from the existing roadside kerb and nearest part of nearest neighbours' houses?

Our recent experience of WBC's handling of "Sawpit" Little Acre development saw initial developer's drawings showing visually modest two storey houses with softer cottage-style half-hipped rooflines, in scale and keeping with existing development in Hurst end up as large three storey houses - doubling in roof area with full length stark high ridges. The massive design change happened retrospectively under WBC's control of "reserved matters" with a supposedly "full" planning application – which proved to be a de-facto build-anything-you-like PiP! Why can't we review the drawings a developer actually intends to use rather than the false, undersized "expectation management" fiction normally submitted and approved by WBC?

With Application: 260353 detailing and committing to even less than "for access only" previous Application: 240583", how for instance can the effects of infiltration loss and surface water displacement from large, raised houses and the resulting increased, faster rainwater run-off flood risk for the neighbours be accurately assessed? For Application: 260353 we don't know whether it is even 5 or 7 houses, let alone how big they are, the finished floor level, drive level, etc?

Rather than just an agreed CIL figure for internal floor area for Council funding, are WBC Planning ever going to request an Applicant or Developer to provide accurate "as-built" verifiable size and position dimensions for what is to be built before it is built? Stating exactly how big will it be and where will it be?

(7) With no dimensional details (or "figured dimensions") provided, how can displaced surface water, loss of greenfield infiltration and faster storm water run-off from roofs and drives be assessed? With regard to neighbouring flood risk and the lack of any specific dimensional information, and based on developer's survey information previously supplied with Application: 240583 - the approximate existing site levels where the developer now proposes to build are: Plot (1) 37.06m AOD, Plot (2) 37.03m AOD, Plot (3) 37.30m AOD, Plot (4) 37.39m AOD, Plot (5) 37.11m AOD, Plot (6) 37.00m AOD, Plot(7) 36.95m AOD.

This year 2026 standing water has already been visible on the site of Plot (1). With adjacent "zone 1" Broadwater and Hogmoor Lanes which flood currently at similar 37m AOD level, neighbouring flooding can only be made much worse by any development raising and paving-over this proposed 37m AOD low-lying site. With nowhere else for the displaced drainage to go other than towards immediate neighbours adding to existing flood risk and flooding, Hurst residents likely to be affected fully understand this certain outcome, but do WBC Planning?

(8) Risk of flooding in Hurst does not appear to be well understood or acknowledged by normally respected Government authorities: The new Local Plan is an important new document which in 10. Flooding and Drainage states in 10.2 “The risk of flooding is well understood”. The evidence does not support this statement.

Clearly flood risk in Hurst is not well understood by GOV.UK otherwise flood maps for planning would match residents’ experience. Less clear is whether Wokingham Borough Council Planning do understand but just don’t want to acknowledge or discuss the worsening storm flooding situation for perhaps legal reasons?

So far WBC Planning have avoided acknowledging the exceptional fluvial flooding problems experienced in Hurst which are not modelled correctly by GOV.UK/EA/OS, nor likely man-made causes like destroying River Loddon floodplain and replacing it with pluvial retention waste hill barriers west of Lodge Road/Davis Street – trapping storm flooding and forever changing surface water drainage patterns within and across central Hurst. Less damaging than Hurst Landfill hills landscaped in 2005, which not only trap and add to central Hurst pluvial flooding but destroyed EA main Rivers draining Hurst to the north and west, Dinton Pastures landscaping with raised Black Swan Lake reservoir and surrounds was completed in 1979. At some time, the Council must have agreed to and approved both these major changes which have destroyed and raised River Loddon floodplain in west Hurst. It is hoped that WBC Planning and as LLFA do understand the situation, but past and present evidence is not good, specifically:

- See (4) (Appendix A) Current (March 2025) GOV.UK Surface Water Flood Risk default 30-year maps for planning very seriously underestimate surface water flooding frequently experienced across Hurst.
- See (4) (Appendix B) Current GOV.UK Flood map for planning for flood zones for Hurst displays clear errors which need to be reviewed and improved.
- See (9) (Appendix C) Inaction by the Environment Agency to delete non-existent EA main Rivers from the database.
- See (10) (Appendix D) Ordnance Survey maps do not properly show or annotate Hurst’s topography and drainage.
- See (11) WBC core documentation such as area character descriptions for Hurst is currently misleading, wrongly describing Hurst’s topography especially for much altered B1.
- See (12) Hurst’s flooding history is incomplete and poorly presented. Past flood reports could have been better - in some cases failing to investigate fully and consequently lacking insight and reasonable understanding.
- See (13) Lack of action by WBC to advise on riparian responsibilities and enforce maintenance of flood compensation both roadside and on private property.
- See (14) (Appendix E) Is the Developer’s supplementary FRA simply a piece of ambiguous spin for a site unsuitable for infiltration drainage like Sawpit, and to help avoid considering all forms of likely flooding which weigh against passing the sequential test?

Review and improvement of key core data GOV.UK, EA, OS, WBC, is important for planning decision making because the Planning Inspectorate clearly looks primarily to WBC and Government core documentation for justification, sometimes quoting sections verbatim in Appeal decisions. Similarly, Inspectors have been seen to give significant weight to developers’ pleas even if such is information is false (for example the intention to drain surface water to an EA Main River specified in core documents but that does not exist. Little weight appears is given to Interested Party comments even if they are factually correct.

Hence, it would have been reassuring for Hurst residents had WBC's local plan included a commitment to urgently review and help correct this out-of-date and misleading in-house and GOV.UK core data and acknowledge the fundamental reasons for Hurst's unusual, largely man-made current pluvial flooding problems.

(9)) Inaction by the Environment Agency to delete non-existent EA main Rivers from the database: With an altered and lengthened route for the Emm Brook to the River Loddon on its far side, the creation of Dinton's embanked Black Swan Lake and surrounding landscaping raised a land barrier to the west of Davis Street Hurst. The subsequent creation of Hurst Landfill waste hills over 50ha of Whistley Park extended this barrier to the north beyond Sandford Lane. This has not only destroyed all original drainage ditches to the Loddon to the west and northwest of Hurst but now retains pluvial flooding within central Hurst. Developers assuming these incorrectly shown online but virtual non-existent EA Main Rivers exist and can be used is causing a huge waste of time for all concerned. This false data used in contractors' unfeasible drainage designs and hydraulic modelling results in a frustrating waste of WBC's time and wastes stretched resources discussing fictitious, but allegedly factual information, and worst of all results in bad misinformed planning decisions being made.

A main ditch concerned, which disconnected from its tributaries now provides no onward drainage flow north or south, and which now exists in some spots only as disconnected swales, is the northern Hatchgate Ditch west of Lodge Road (alternatively annotated as the Whistley Green Ditch on GOV.UK maps). The direct consequence is that since 2006 natural surface water drainage from the west of Hurst increasingly has to seep east around Church Hill anyway it can and then north to the Twyford Book via the ditches close to Hogmoor. This extra pluvial drainage load must contribute to the increased incidence of flooding around the Hogmoor Application: 260353 site and not yet modelled by GOV.UK. see: [APPENDIX \(C\)\(UEAMRM\) Update of the Environment Agency EA Main River Map Data Urgently Required:](#)

The sooner the GOV.UK EA main River map for Hurst is corrected the better for both WBC and Hurst residents; are WBC as LLFA able to help expedite the Environment Agency and others to make this long overdue change?

(10) Ordnance Survey maps do not properly show or annotate Hurst's topography and drainage. The huge changes to the topography and floodplain to the west of Hurst that have massively affected drainage are generally not shown or mentioned on any core documents. A key document not to show the changes are Ordnance Survey Maps. The EA and OS data logos appear on GOV.Uk flood maps and this topographical data crucial to the accuracy of the maps should be up to date and correct; not inaccurate and a generation or more out of date. See: [APPENDIX \(D\)\(UOSMH\) Update Ordnance Survey Map for Hurst:](#)

For earlier Hogmoor Application: 240583 versions of WBC's S-19 flood report were submitted, the latest being "Final Nov 24" included in Interested Party documentation ([currently 240583 Documents, Interested Party, page 5, 6 docs up](#)). Looking at "[S-19 Addressing flooding in Hurst](#)" it includes "[OS MAP AROUND HURST](#)" the text "[\(shows zero contours = very flat\)](#)". Central Hurst village between Hurst Landfill hill and Haines Hill is very flat but the map shows no contours for the three landfill hills, nor for Dinton's golf course hill, nor does it show the landfill perimeter ditch, nor the surrounding embankment and raised level of Dinton's Black Swan lake reservoir and its unannotated level raising weir at its northeast bank, nor does the OS map used show Hurst's active drainage ditches correctly, or even at all, also not shown are

the completed developments at Sawpit (Little Acre) or even at earlier Nursery Gardens. We might expect a contractor working remotely not to be aware of the errors on this topographically very misleading OS map for Hurst but not WBC. WBC's use of such inaccurate core data unfortunately questions the report's credibility as did the statement in S-19 4.3 "the River Loddon, flows south, along the eastern fringes of Wokingham Borough."

Hence to help improve the understanding of flooding in Hurst, and quality of GOV.UK flood modelling, are WBC Planning and as LLFA able to help Hurst residents expedite Ordnance Survey to get this crucial core document and associated online data reviewed, improved and updated?

(11) WBC core documentation such as area character descriptions for Hurst is currently misleading wrongly describing Hurst's topography especially for much altered "B1 Loddon River Valley with Open Water": Accurate core descriptions of the true character and appearance of this substantially modified and raised River Loddon floodplain within WBC core documents is long overdue. Correct descriptions are important because this is what the Planning Inspectorate looks at and uses verbatim their reports. To state B1 includes "landfill" and is "restored floodplain" does not honestly describe physically or hydraulically 50ha of actual capped waste hills forming a partial flood barrier with increased surface water run-off. Development of Dinton Pastures has created a much-valued leisure amenity but again is original floodplain topographically modified and replaced with raised landscaping that is largely no longer "restored" functioning floodplain or simply low-lying flooded gravel pits. The floodplain-displacing embanked and raised reservoir Black Swan Lake and Golf Course hill features created should be accurately described .

Although update of character descriptions for B1, C2 etc for Hurst across WBC core documents may appear low priority, WBC's current typically misleading benign descriptions are clearly what the authorities Planning Inspectorate, Ordnance Survey, Environment Agency read and give decision-making weight whether right or wrong - effectively disregarding factual Interested Party comments repeatedly submitted by Hurst residents. Even if Ordnance Survey and the Environment Agency don't want to detail Hurst as it is "warts and all" it would be good if WBC could at least make sure their documents are honest.

Would WBC please update area character descriptions as a priority to properly and honestly describe the massive historic topographical changes to river Loddon floodplain west of Davis Street and Lodge Road B3030?

(12) Hurst's flooding history is incomplete and poorly presented. Past flood reports could have been better - in some cases failing to investigate causes fully and consequently lacking insight and reasonable understanding as to what might be usefully improved:

(12.1) There is an apparent "lack of awareness" of Hurst's flooding and sewer surcharging history across the board, to quote "of recurrent flooding incidents and drainage problems on Broadwater Lane affecting residents next to the site, particularly 2014 and 2012." The screenshot of paragraph 5.1.2 of WBC's Level SFRA May 2023 document may give a clue to part of the problem, Hurst is never mentioned! Namely:

5.1.2 Section 19 Flood Investigation

Under the Flood and Water Management Act (2010), the Lead Local Flood Authority (LLFA) has a duty to investigate flood incidence where considered necessary or appropriate and produce a report. Section 19 Flood Investigation reports are available for the following flood events:

- Various locations, winter 2013/14
- Sandford Lane, January 2016
- Knowl Hill, February 2020
- Wargrave, June 2020

Reports detailing the flood events, recommendations and conclusions are available through the [Wokingham Borough Council website](#) or via request to the LLFA.

Knowl Hill and Wargrave are mentioned but “Hurst” becomes “Various locations” and “Sandford Lane”. Sandford Lane is flood zone 3b and regularly preferentially floods, but the Loddon flooding is directed into and spreads over “Hurst”; not just “Sandford Lane”. The flooding in winter 2014 which cut off Hurst for normal vehicles, with associated sewage problems in Hurst’s Sawpit area and at the Elephant and Castle, was reported belatedly in 2016 and was across many locations in Hurst. Hence Hurst’s flooding history should refer firstly to Hurst otherwise an awful lot of roads and lanes will need to be mentioned including Broadwater Lane, Hogmoor Lane, Tape Lane, Islandstone Lane, etc. At present when Planning Inspectors review SFRA documents “Hurst” doesn’t appear much.

More accurate reporting of Hurst’s flooding and sewer surcharging would help WBC as LLFA better understand the flooding and drainage issues within central Hurst. Might it be useful to compile a Hurst flooding history review for the benefit of both WBC’s and Thames Water’s decision making?

(12.2) WBC’s flood reports have not always been good value for taxpayers’ money. For instance, mentioned many times before, WBC’s 2016 flood report for Hurst’s Sandford lane flooding made no mention the area was zone 3b, or the flooding was expected and preferential from the weir in the Hurst bank of the River Loddon upstream of Sandford Mill. Had core documentation for Hurst been more accurate perhaps the contractor might have produced a more useful report.

The latest S-19 flooding report is perhaps the first to seriously consider Hurst’s regular flooding but does not address the largely man-made pluvial causes of the flooding problems within Hurst’s central pluvial trapment triangle into which the forgotten Billingbear Brook draining from the Popeswood area of Bracknell, seasonally tops up pluvial surface water in central Hurst. Addressing restrictions to the downstream flow to the Twyford Brook will hopefully help but will make little difference to trapped, low lying areas near 37mAOD like Broadwater Lane next to the proposed site. Destroyed flood compensation, filled-in roadside swales and ditches need to be reinstated and onward drainage created to match the changed internal upstream drainage pattern south and east around Church Hill. It doesn’t help that this otherwise constructive report contained the odd stupid mistake (River Loddon flowing the wrong way on the wrong side of Wokingham) and included an inaccurate and out-of-date OS map, which with input of local knowledge, deficiencies on the OS map could have been suitably marked up or annotated.

For more accurate WBC flood reports, consultation with Hurst Interested Parties and stakeholders, and their involvement in document review before release, could well improve final issue quality and usefulness to WBC.

(13) Lack of appropriate action by WBC to advise on riparian responsibilities and enforce maintenance of flood compensation both roadside and on private property: The

construction of capped waste hills and elimination of drainage ditches west of Lodge Road a generation ago resulted in a step change increase in the severity of pluvial flooding and surface water drainage patterns within central Hurst. However, problems appear to be getting worse and more frequent, and this could well be a result of subsequent new infill development and “suburbanisation” of frontages and destruction of ditches and swales on private land.

To alleviate this increased local surface water flooding, LLFA WBC need to improve monitoring, maintenance, and reinstatement of historic roadside ditches and swales across the whole of Hurst, but particularly where newer houses have been built close to roads. It is not appropriate to quote specific examples here, but Google Street View does provide WBC with before and after comparisons to assist enforcement without turning neighbour against neighbour. It would be sensible for the proposed Hogmoor development not to have the proposed full pond behind the raised houses but logically typical Hurst old-fashioned new roadside swales at the front between the raised houses and access drives and the road, to drain, catch and hold A321 flash flooding and to avoid making road flooding worse. It does look as if there once may have been a ditch or swale beside 5HU030 site along Broadwater Lane which has been gradually filled with debris over the years, and it is at the roadside where a swale to alleviate road flooding would make sense.

Within WBC’s core documents, including the new local plan, there is a stated presumption against culverting of open watercourses, maintaining natural drainage features and enhancing and restoring river corridors. In 30 years of living in Hurst there has been little evidence of this happening or any enforcement by WBC to make it happen. The most high-profile recent example is perhaps the Lodge Road site Application: 242067 where the EA suggested the onsite filled-in Hatchgate Ditch tributary be reinstated to full open ditch but backed down despite Policy FD3 in the Local Plan Update stating in 4, “**The culverting of any watercourses should be avoided where possible, and opportunities for the deculverting of watercourse should be actively explored and pursued.**”

It is easy to just blame riparian owners for lack of maintenance where, in the case of Lodge Road Hatchgate Ditch tributary on private land the responsibility is clear. But where one’s Land Registry property stops 5m from the roadside kerb, who is responsible? Where the ditch damage is due to inconsiderate passing heavy traffic driving verges into ditches, a big problem on Hurst’s narrow single-track roads, who pays? Where frontages have been suburbanised, filled in, fences moved, obstructive roadside or planting carried out, should not WBC as LLFA be first advising the riparian owner of their duty if they are the landowners, or if the land is Council owned verge and pavement simply take necessary action?

To reduce nuisance pluvial flooding within central Hurst, do WBC plan to step up advice to riparian owners to maintain or reinstate flood compensation, and/or step up enforcement action to reinstate Hurst’s long-standing passive drainage features and associated storm flooding compensation?

(14) Is the Developer’s supplementary FRA simply a piece of ambiguous spin for a site unsuitable for infiltration drainage like Sawpit, and to avoid consideration all other forms of likely flooding which weigh against passing the sequential test?

(14.1) Applicant’s SUPPLEMENTARY STATEMENT ON FLOOD RISK ISSUE 1 Ambiguity:

It is hard to understand how WBC Planning accepted the Developer's previous FRA when they disrespectfully submitted a random map or Esher in Surrey, rather than mention Hurst's reservoir flood risk, see screenshot (right).



Figure 18: EA Reservoir Flood Map

5.31 Based on the EA's reservoir flood map, the risk of reservoir flooding is considered to be low.

This latest FRA note does not start well in Figure 2.1 with the site for flood risk assessment including only house plots 1, 2 and 3, delineated in red, a site which does not match the PiP plot, see screenshot (below left). Elsewhere a familiar trick of using a thick site delineation line to conceal high Broadwater Lane surface water flood risk indication appears yet again.



(14.2) Applicant's hybrid

surface water flood map is more than ambiguous or, no it doesn't show the latest map:

Although the Applicant's Figure 2-2 in the screenshot (below) purports to show the latest EA risk of surface water flooding map, and looks a bit like the current online GOV.UK Flood maps for Planning SWFR for "Insurance and buying and selling", which as of March 2025 were unaccountably downgraded with previously **Med** risk postcode areas now reassigned as very **Very Low** risk. On inspection, the Applicant's SWFR map is not the "latest" map but consistent with a hybrid of an older pre-March surface 2025 water flood pluvial map with the wrong key for "Rivers and the sea" superimposed.

Why use a superseded map when the "new" default map (see (4)) shows no flooding at all with only a one colour key? Possibly because it is so obviously not credible in view of residents' evidence. The current GOV.UK Surface water maps for "insurance and buying and selling" have only a three-colour key set to the right of the map. Submitting this nonsense for review is irresponsible and surely WBC Planning should simply reject the document as should have been done with the previous FRA? With these obviously incorrect and false opening contributions how can anything else in the Applicant's document be taken seriously or be approved by WBC Planning?

2.2 Surface Water Flooding

2.2.1. Figure 2.2 below shows the latest EA risk of surface water flooding map. The map shows the site to largely remain unaffected by surface water flooding apart from a small area along the northern boundary. The change is linked to the release of mapping improvements in March 2025 that incorporate enhanced data resolution and refined flood modelling techniques. There is no surface water flood flow path linked to the small area of surface water flood risk and from review of the topographical survey it is considered that predicted flooding is associated with a level part of the site where surface water runoff from the site could potentially accumulate during a rainfall event. A swale is proposed in the location as part of the development, which would manage surface water runoff in a similar manner to the situation indicated on the flood map, so it is not considered to present an issue to development taking place or warrant any further mitigation.



Figure 2.2 EA Risk of Surface Water Flooding Map

P23-1019

09/07/25

2

(14.3) Reservoir flood risk is an issue for Hurst: Clearly the Applicant originally attempted a deception to evade Hurst's reservoir flood risk. The supplementary note appears to now address this issue in 2.5.1 stating the site remains in an area that is not at risk of reservoir flooding, see screenshot (below) unhelpfully zoomed out hiding any detail.

2.5 Flooding from Artificial Sources

2.5.1. Figure 2.5 below shows the latest risk of flooding from reservoir map from the Level 1 SFRA. The maps show the site to remain in an area that is not at risk of reservoir flooding.

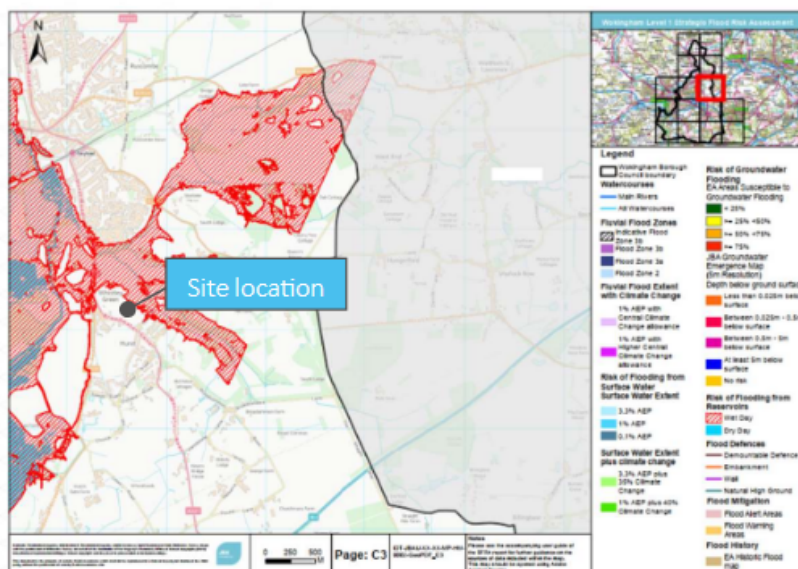


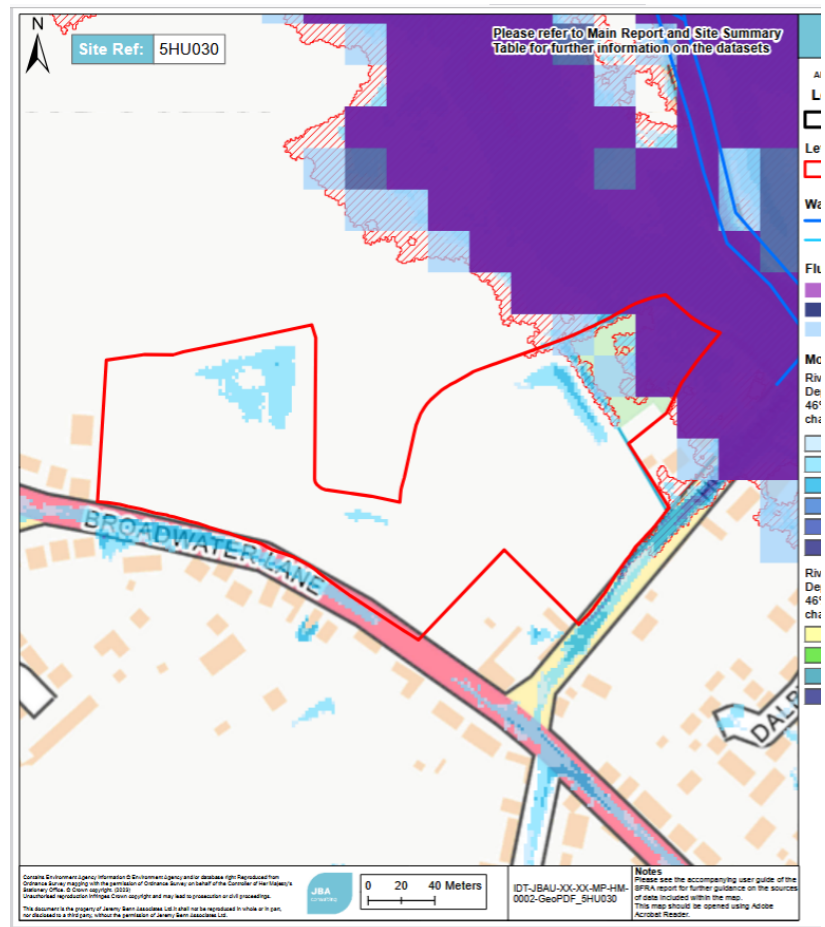
Figure 2.5: Level 1 SFRA Risk of Flooding from Reservoirs Map

These composite maps are impressive but must be used with great care – notice for instance the reservoir wet day flood extent red hatching crossing into Maidenhead and Windsor grey area, stops abruptly east of a nne/ssw arbitrary boundary line between Thames Water and South East Water regions, not because “wet day” flooding stops but presumably due to an absence of South East Water data for that half of Hurst! Perhaps this arbitrary border between water regions is why the “South East Water’s” Billingbear Brook appears to be a bit under the radar as a source of flooding for central Hurst? If one clicks to see EA Main Rivers

superimposed the online GOV.UK information is consistently incorrect or cannot be trusted, with the non-existent rivers to the west of Hurst now buried by Hurst landfill hills but still shown as existing.

(Right) Ref: *Wokingham Council Evidence Studies – Climate change, flood risk and environmental sustainability – Level 2 SFRA 2023 Appendix D Site 5HU030 (PDF)*. Zooming-in on the (use-with-great-care) online flood risk information for the greater low-lying 5HU030 site, Broadwater Lane bordering the southwest boundary is subject to regular frequently photographed surface water flooding, as is Hogmoor Lane bordering the southeast boundary, which is also where sewer surcharging has been recorded close to the junction with A321.

Onsite, the computer prediction shows areas of standing water which again have been photographed with ponding standing surface water already visible this year 2026 in the proposed location of Application: 260353 **PLOT 1**. This computer tool does appear to show local surface water flood risk more accurately but not the full extent experienced.



Flood zones, 3a, 3b, 2, and reservoir wet day flood extent are still predicted to cross over significantly on to 5HU030 to the northeast immediately adjacent to the site of the proposed “offsite” attenuation pond. Importantly, Reservoir wet day flood risk extends to the edge of, and on to the plot adjacent to the pointless proposal for a surface water attenuation pond; if built below 37m AOD it will always be full of groundwater in winter and spring, if built up as a reservoir it would displace flood water to the neighbours. It is difficult to understand, unfathomable how at the last appeal WBC Planning fully accepted the Developer’s FRA, had no objections on flood risk grounds and Planning Inspector Mr T Burnham at Appeal Ref: APP/X0360/W/25/3359898 consequently did not even consider flooding as an issue.

Ref: WBC App No: 211532/ 240985/ 230657/ FOI Ref No: 18820 (Sawpit) – as a salutary example WBC Planning’s acceptance of unsatisfactory Applicant’s drainage proposals followed by failed “reserved matters” handling of these unfeasible infiltration drainage proposals. Treating natural site drainage and sewage disposal as reserved matters for recent developments, where “infiltration” is unfeasible almost anywhere in central Hurst, has failed and resulted in increased flood risk for near neighbours. This referenced recent “Sawpit” development in Hurst is a sad example where planning permission was given based on unworkable infiltration to dispose of surface water, and is now simply a discharge pipe draining to a local ditch, but a ditch which no longer connects to an EA Main river as the river itself does not exist, so Sawpit (Little Acre) drainage now simply increases flood risk for neighbours.

With the whole 5HU030 site flat near 37.0m AOD only very small changes in predicted levels put the whole zone 1 designated site at risk of all forms of flooding. With Dinton Pastures' embanked Black Swan Lake, built in 1979 when Hurst was more sparsely populated, and with the subsequent raising of Hurst Landfill hills and building of 150+ additional low-lying dwellings in central Hurst, now might be a good time to reassess the reservoir flood risk. With a water surface area of around 275,000 square metres, and with a level of over 1m above the Emm Brook and River Loddon 02/03/2026, the quoted volume of 200,000 cubic metres for stored water at risk of escape may be an underestimate.

(14.) The case for WBC as LLFA reappraising Dinton Pastures Black Swan Lake reservoir flood risk: Firstly, consider WBC SFRA 2023 statements:

3.2.3 Flood Zones - other sources of flooding

Other sources of flooding also need to be considered as part of the sequential test. This includes reservoir and groundwater flooding.

8.4.3 Reservoirs

As discussed in Section 5.8, the risk of reservoir flooding is extremely low. However, there remains a residual risk to development from reservoirs which developers should consider during the planning stage:

- Developers should contact the reservoir owner for information on:
 - the Reservoir Risk Designation
 - reservoir characteristics: type, dam height at outlet, area/volume, overflow location
 - operation: discharge rates / maximum discharge
 - discharge during emergency drawdown; and
 - inspection / maintenance regime.

Also: "A consideration with respect to the reservoir maps is that placing new development in locations potentially affected by reservoir inundation could potentially change the "risk category" of the reservoir and this could result in the reservoir owner "undertaker" having to invest in substantive remedial works to demonstrate that the reservoir had the appropriate level of safety. This is not strictly related to the sequential test but should be appropriately managed when planning new development."

It is certain that Hurst residents would rather the future of a great, much appreciated amenity at Dinton Pastures (Black Swan Lake) not be put at risk by speculative developers wanting to build on inappropriate, low-lying 37m AOD greenfield sites in central Hurst which flood. For further details see: [APPENDIX\(E\)\(BSLRFR\) Black Swan Lake Reservoir Flood Risk:](#)

Please refuse this PiP.

Andrew Butler 06/03/2026

APPENDICES:

APPENDIX (A)(MSWFR) Misleading GOV.UK Surface Water Flood Risk data:

APPENDIX (B)(FZGE) GOV.UK Flood Zone Map Glitches and Errors to be Reviewed and Improved:

APPENDIX (C)(UEAMRM) Update of the Environment Agency EA Main River Map Data Urgently Required:

APPENDIX (D)(UOSMH) Update Ordnance Survey Map for Hurst: Including issues restricting The Hatchgate Ditch flow to the south:

APPENDIX (E)(BSLRFR) Black Swan Lake Reservoir Flood Risk:

APPENDIX (A)(MSWFR) Misleading GOV.UK Surface Water Flood Risk data:

(4.2) New “1 in 30 Annual Likelihood of Flooding” GOV.UK Flood maps for planning (pluvial) surface water flooding are a misleading downgrade of previously predicted flood risk, grossly inaccurate, and should not be used for Hurst; unbelievably the 1 in 1000 year GOV.UK SWFR prediction now more accurately represents the typical annual winter/spring situation within Hurst – but with even the extent of 1 in 1000 years surface water prediction proving less than flooding recently experienced:



Pre March 2025 the GOV.UK Surface water Flood Map classified the pluvial flood risk using four colours on the same map for high, medium, low and very low risk, see old map photo of Lodge Road sites (left). This gave an immediate indication of areas most at risk, and the extent of possible flooding.

With respect to WBC Applications: 252934 & 242067, and if one looks carefully, this superseded map accurately shows the correct extent of flooding covering most of an adjacent neighbouring Nursery Close garden, see screenshot (right). This recent flooding extent is no longer predicted by the new GOV.UK roll-out flood maps for planning, fluvial or pluvial. Individual

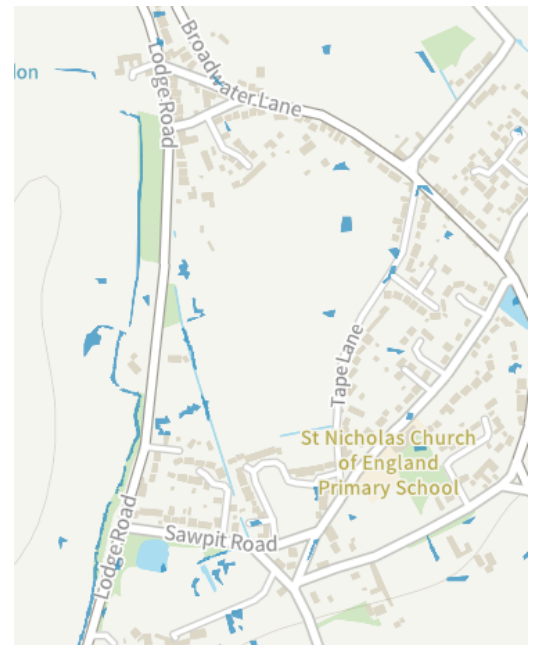


“postcode” risk has also been reduced, typically “Med” to “Very low”.

The March 2025 roll-out pluvial maps for planning now use only one flooding colour and rely on options being selected, once in 30 years (the default), once in 100 years, and once in 1000 years. The full extent of the predicted once in 1000 years flooding has been reduced and the “default” setting is 1 in 30 years or now a prediction of “no flooding” in areas previously at predicted flood risk.

In the screenshot (right), the new theoretical default, and severely downgraded unrealistic GOV.UK 30-year flood risk predictions rolled out in March 2025 are a misleading travesty; don’t be fooled into thinking that just because this is a new government/EA/OS roll-out it is an improvement! This appears to have been a sinister government-backed data manipulation exercise to downgrade apparent surface water flood risk without any reference to Hurst’s actual flooding history. A possible purpose being perhaps to make it easier to allow developers to override legitimate local objections and build on land which floods?

How absurd the “new” default GOV.UK predictions really are can be appreciated by considering one of the flooded properties White Rose Cottage in Hogmoor Lane the subject of the recent WBC “S-19” flood report. In the screenshot (below left) the 1 in 30 years default option of the GOV.UK surface water flood map for planning shows no flooding at all. The Wokingham Today photo of White Rose Cottage (below centre) shows actual flooding. In the screenshot (below right) the GOV.UK 1 in 1000-year flooding extent officially predicted only affects the nearby ditch.





White Rose Cottage lies within “Rivers and sea” flood zone 2, just touching flood zone 3. Had the flooding been fluvial due to rising main rivers, a lot more of Twyford and Hurst would also have been flooded. This again is an example of GOV.UK’s serious underestimation of Hurst’s largely man-made more serious pluvial flood risk exceeding the once in 1000-year prediction.

A little way from white Rose Cottage for example, GOV.UK flood zone 1 designated roads surrounding the proposed “Land North of Hogmoor Lane” site 5HU030 pictured below apparently will no longer flood due to surface water (or rivers and sea).



The main A321 Broadwater Lane impassable flooding recently photographed (left) extending across “Buttercups” front garden is now a GOV.UK once in 1000-year event.



The recent road and ditch flooding photographed in Hogmoor Lane and published in Wokingham Today (above right) is predicted not to happen in a lifetime.

Thames Water apparently have no record of sewer surcharging close to A321 (S-19 report, and photographed in 2023, (right below) adding to Hogmoor flooding - just does not appear on the flood maps. This sewer surcharging resulting from pumped sewage from either Wokingham Road, Hogmoor and Sawpit sub-pumping stations, and leachate from Summerleaze waste landfill, is exceeding the capacity of Broadwater (Twyford) SPS BROAP2ZZ to handle Hurst’s existing foul water, while the nearby Twyford Brook ultimately handles all Hurst’s surface water natural drainage including this contaminated surcharge.



Similarly, GOV.UK now predicts almost no flooding at all is expected in Tape Lane (left)! This is where Willowmead fields development run-off drainage is most likely to drain in a storm and where Lodge Road developer planned an emergency access from the field to the right.

Photos above generally apply to the C2 central village area of Hurst Terrace, but the new GOV.UK March 2025 roll-out of irresponsible underestimates of Hurst’s once in 1000-year surface water flooding predictions, apply equally elsewhere across Hurst as the screenshot of the GOV.UK flood map of I1/K1 Broadcommon Lane (below) demonstrates.



The current 1 in 1000-year GOV.UK surface water flooding prediction beyond C2/I4 at Billingbear Brook bridge in Broadcommon Lane (K1/I1 boundary), above shows the road still centrally clear for traffic. The photo (right) shows the road fully flooded, flooding worse than the GOV.UK once in 1000-year prediction - the muddy water too deep for pedestrians to cross comfortably or safely in walking boots - with hazardous deep ditches both sides and the sharp drop to the roadside



Billingbear Brook obscured, makes this flooded road potentially extremely hazardous for pedestrians, cyclists and motorists.

Broadcommon Lane's adjacent Billingbear Brook not flooded can be seen in the photo (left) – this single-track road was clearly never intended for heavy traffic! Flow in this seasonally very active brook, draining into Hurst from the Popeswood area of Bracknell, lies in South East Water's area and so may escape scrutiny in Hurst's flood risk modelling (unlike the Emm Brook and Twyford Brook).



Knowing this official flooding prediction information is clearly false, WBC must surely assess whether use of this false GOV.UK data is open to legal challenge, and meantime advise the Developer that this new GOV.UK online SWFR flooding data does not match Hurst's recent and regular flooding history and should never be used solely as a basis for Hurst flood risk assessment or predicting the theoretical outcome of worst case or unlikely flood events to justify their building on land which floods. For instance, unless something changes the approved Willowmead fields development will ultimately use the same irresponsible default "Sawpit and Lodge Road" surface water drainage route to nowhere as Sawpit's "Little Acres" has; draining to a closed and now defunct Hatchgate Ditch tributary soakaway.

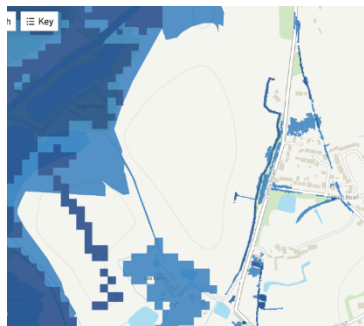
Hopefully, as responsible LLFA and appreciating Hurst's unusual local topography and resultant enhanced flood risk, Wokingham Borough Council will not allow this bogus GOV.UK March 2025 surface water flooding information to be irresponsibly used by developers to falsely gain planning approval for impractical drainage schemes that simply make flooding and risk of flooding worse for neighbours.

What is Wokingham Borough Council's view on the use of this known-to-be-false GOV.UK Surface water flood map for planning data for planning application approval, and the potential legal implications resulting from potential harm caused?

APPENDIX (B)(FZGE) GOV.UK Flood Zone Map Glitches and Errors to be Reviewed and Improved:

While providing useful guidance, GOV.UK Flood risk for planning maps for Flood Zones currently display obvious glitches and serious errors in detail for Hurst and must be used with care:

In the photo (right) the sheen of the previous day's rain can be seen still running off the capped landfill hill towards Hurst into the Hurst Landfill perimeter ditch north of "Old Lodge". This significant ditch and conduit



for zone 3 fluvial flood risk pictured is incorrectly not shown north of "Old Lodge" towards Whistley Green on the current GOV.UK map screenshot (left). Surely knowing of this error and its proximity to the Lodge Road sites, the onus should be on WBC Planning or as LLFA to advise any developer of the omission together with its additional flood risk and

contamination implications for properties built alongside or near Lodge Road?



Also in the current GOV.UK/EA/OS Flood Map for Planning photoshot (above left) The same GOV.UK map absurdly shows the 44m AOD top of the southwest Hurst Landfill hill (a similar height to Hurst's Church Hill) with a strip of Flood Zone 3 risk above waste storage cells 01 and 02. A full 7m higher than current developers' proposed building sites in Hurst, perhaps seemingly far apart but on the same low 37m AOD level such as Applications: 260353 (Hogmoor) and 252934 (Lodge Road). With two such very obvious flood mapping errors within only a small area of Hurst should not WBC as LLFA be advising this online data for Hurst should carry a suitable warning "[GOV.UK responses may include errors.](#)"

Note, comments above apply to detailed GOV.UK Flood map for Planning for "planning scoping". Less detailed map options for "buying and selling" and for "insurance" appear similar to superseded SWFR maps but with flood extents slightly reduced, and individual "postcode" flood risk assessment for individual properties was also unaccountably downgraded as of March 2025 with (for example) a previous "Medium" risk assessment now arbitrarily changed to GOV.UK "Low Risk" classification – despite climate change considerations and the actual risk remaining unchanged.

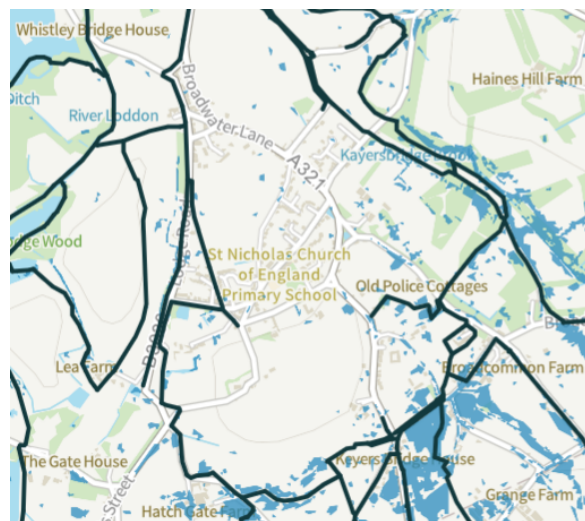
At present it appears WBC Planning only consider the GOV.UK River and sea fluvial flood map risk and extent for planning (rather than pluvial) when assessing whether a site meets the sequential test, in which case there must be confidence in the accuracy of the maps. However, these fluvial maps currently and unacceptably show clear errors due to wrong programming or wrong data input which begs questions:

Have WBC as LLFA provided feedback to GOV.UK/EA/OS regarding these obvious glitches or errors for Hurst and what is being done by the authorities to review and improve the accuracy of the flood zone predictions?

Designating an area in Hurst zone 1 based on questionable computer output does not mean that it does not flood and is ok to build on. Consider Broadcommon Lane, A321 Wokingham Road, Hogmoor Lane, Tape Lane, Church Hill – all roads nominally zone 1 but often closed due to flooding. Are WBC Planning ever going to acknowledge that the main flooding issue for central Hurst is human-enhanced pluvial, exacerbated by fluvial and pluvial flood mapping should surely be given precedence or significant due weight when approving planning applications and not ignored?

APPENDIX (C)(UEAMRM) Update of the Environment Agency EA Main River Map Data Urgently Required:

Some EA Main Rivers (local drainage ditches), shown on GOV.UK Flood maps annotated black (screenshot right) are misleading and inaccurate, showing and annotating digital virtual EA Main Rivers that no longer exist, displaced by Hurst Landfill a generation ago. Particularly relevant to Hurst, are the now non-existent Whistley Park northern sections of the Hatchgate Ditch directly connecting with the River Loddon - still wrongly and very misleadingly shown as potential waterways for onward drainage to the north and west of Hurst. All increased surface water run-off from proposed developments in central Hurst (Lodge Road, Willowmead, etc.) will now take the tortuous southern/eastern route, draining first towards Sawpit Road, Lodge Road “issues” area, then seeping south and east around Hurst hill towards Keyers Bridge and the Stowe and Green man streams – contributing to increased “S-19” flooding at Hogmoor (Green Man and Stowe streams appear as Kayers Brook on GOV.UK map (above)).



At the recent 2025 “Lodge Road” Appeal Application: 242067 it was asked directly “[when will the Environment Agency update their wrong and misleading online GOV.UK/EA Main River data](#)” but the question received no answer from EA representatives present or anyone else. Summarizing, the EA response to a previous similar written request to correct the maps, the EA stated in their email response that *“While there is a process for challenging the flood map, there is not currently a process for challenging the main river data set.”* See: EA reference Subject: GE35642_DC FW: 240910/IL16 – Wokingham Borough Council Planning App: 242067 22/10/2024. Subsequent follow-up emails have been sent to Joanna Marchant representing the Environment Agency at the Lodge Road appeal, but no response has been received.

Also, after initially requesting the significant portion of the Hatchgate Ditch tributary (originally filled-in on the Appellant’s Lodge Road site without approval or with the necessary permits 15 years ago), be reinstated – the EA inexplicably backed down during the appeal and withdrew all objections; WBC as LLFA also have inexplicably never enforced reinstatement of that lost flood compensation capacity (which is directly relevant to where increased Lodge Road site pluvial run-off will temporarily drain before it infiltrates and seeps south).

Perhaps the EA has lost its way and needs to reset priorities particularly for Hurst. Specifically in 2016, the EA were happy to let Summerleaze increase discharge of cyanide, lead and copper content of Hurst Landfill leachate pumped into Hurst’s foul sewer system and decommission the landfill gas engine electrical generator (EPR/BV72221V/V004), but in over 20 years have not yet managed to delete non-existent “Main Rivers” from GOV.UK online data, despite obviously knowing all about their permanent displacement by general waste landfill hills. This lack of appropriate EA action is resulting in a considerable waste of Developers’, WBC’s, Residents’, and Planning Inspectorate’s time, valuable time unnecessarily spent producing, reviewing and discussing inappropriate FRAs and unfeasible drainage proposals.

It would be good if the Environment Agency is able to prioritise, advise, and constructively contribute to what is finally decided for privately owned sections of the boundary Hatchgate Ditch tributary, originally putting forward a good idea to reinstate the onsite filled-in section of the ditch. However, the EA needs to stay more focussed, commit to good decisions and see them through! Meanwhile Woking Borough Council Planning must be fully aware of the problems in core documentation for Hurst and be able to advise developers which EA Main Rivers no longer exist and not to be included as part of a developer’s drainage scheme of FRA document, and work with EA to identify which surface water drainage routes, all now towards Hogmoor, are active and need to be enhanced.

APPENDIX (D)(UOSMH) Update Ordnance Survey Map for Hurst: Including issues restricting The Hatchgate Ditch flow to the south:

(OS supports GOV.UK info)
The normal OS maps for Hurst available to the public are quite misleading regarding lack of annotation of major man-made topography changes to Hurst's River Loddon floodplain and incomplete and random annotation of Hurst's currently active surface water drainage ditches south and east of Church Hill draining C2: Hurst River Terrace and I4: Hurst Farmed Clay lowland.



Raised man-made features now displacing most of Hurst's original River Loddon floodplain, B1 (Loddon River Valley With Open Water), and now trapping surface water within Hurst village and not shown are: Whistley Park not marked as "Landfill" site, no appropriate 40m contours for 3 general waste hills, also Dinton's gravel-waste golf course hill not shown. The surrounding embankment of Black Swan Lake EA reservoir stored water, raising lake level above the adjacent Emm Brook and River Loddon level (quite clear on LiDAR map), is not shown or annotated with hatching - whereas some raised landscape features are. The level raising stop-log dam/weir is not shown or annotated (but shown and annotated as "sluice" on both OS master maps GOV.UK flood maps).



Annotated just below "Black Bridge", the important "Weir" (screenshot left) in the east (Hurst) bank of the Loddon is shown (but not annotated on GOV.UK flood maps see screenshot right). This preferentially dumps higher River Loddon levels towards Hurst into the Flood Zone 3b water storage area of Sandford Lane/Lavell's Lake, a preferential flood water storage area indicated by the OS wading bird "Nature reserve" (not "cross-hatched" EA



"stored water"). Details of this old weir, which is located just west of the Woodley/Hurst boundary by a few metres, were not included in WBC SFRA 2020 Table 12 list of structures.

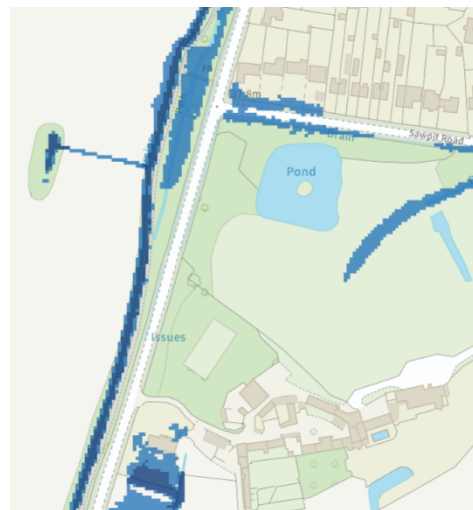
The "Sandford Gap" low-lying conduit via Lea Farm and the Summerleaze landfill perimeter ditch exposes central Hurst to a preferential Loddon fluvial flooding - the perimeter ditch, or leachate/run-off/contamination segregation ditch, this the only significant water feature now remaining in Whistley Park, is not shown (although part shown on GOV.UK fluvial flood maps for planning).

West of Lodge Road non-existent Whistley Park EA Main Rivers are correctly not shown by OS (in contrast to the wrong online GOV.UK/EA data). East of Lodge Road the now non-existent onsite filled-in and blocked north section of the main Hatchgate Ditch tributary is wrongly still shown as open active ditch.

Ordnance Survey have been contacted with a view to correct misleading aspects of the OS map. This has resulted in a reported OS surveyor site visit to Lodge Road lasting two days, with me being advised

19/12/2025: “These updates will be in the January release of MasterMap, available to customers 05/01/2026”. However, without access to OS master mapping, the OS Map a normal member of the public can purchase online remains unchanged and misleading.

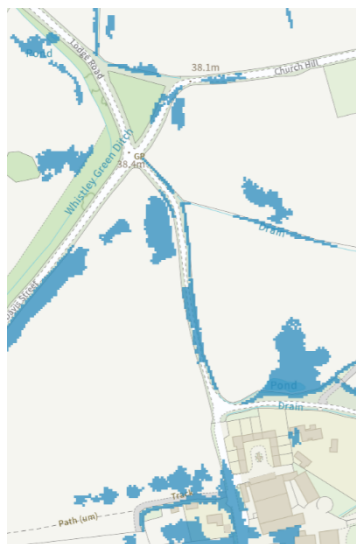
Do WBC Planning have access to OS master maps, or had any contact with OS to verify any updates? Are the Council able to add weight to Hurst residents’ efforts to get this normally-trusted-but-wrong core document to properly show the man-made topographical situation to the west of Hurst seriously affecting surface water drainage, and show actual current pluvial drainage routes south of Church Hill to the Twyford Brook?



GOV.UK data utilizes OS data and the screenshot towards the south of Lodge Road (right) is currently annotated “Issues” on the GOV.UK Flood Maps (see later detail). What these issues are is not known but are likely to include the following:

- No ditches draining south or north either side of Lodge Road.
- To the west, very close proximity to the adjacent Waste Landfill perimeter ditch shown as GOV.UK Zone Flood Zone (3) and (2) risk with the added pollution risk of leachate and dissolved gas contamination.
- Close to Landfill gas vents/ sampling points.
- No active culverts under Lodge Road although damaged remains of headwalls can be found.

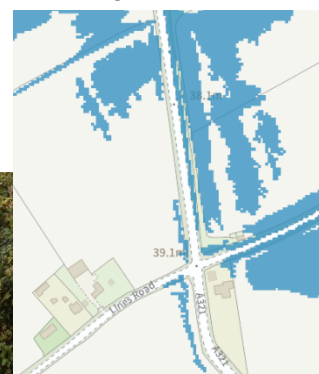
All surface water drainage from the Martineau, Sawpit and Lodge Road area and Willowmead Fields will have to pass across this area before draining anticlockwise around Church Hill towards Keyers Bridge. From the soggy area south of Church Hill neither the GOV.UK Flood Maps or Ordnance Survey Maps show active ditches draining towards Keyers Bridge correctly or at all. For instance, all that is left of the active flowing Hatchgate Ditch to the west side of Lines Road is pictured in the photo



(right) with a strong flow south directly towards Hatch Gate Farm, as indicated by the stick and ribbon in the foreground. Lots of maps wrongly indicate this flow north. February and March are perhaps a good time for WBC as LLFA to survey what is happening in these ditches. There are simply no ditches shown along Lines Road on the 6 ¼” OS Map. In the GOV.UK Flood Map screenshot (left) the active ditch pictured is not shown at all but the stagnant “swale” ditch on the opposite side of Lines Road is shown.



At the opposite end of Lines road joining A321 things are not much different with a turbulent active flow heading east on the south side then crossing on the surface to join the A321 ditch towards Keyers Bridge and “S-19” flooding. Again, this active ditch is not shown on official maps OS or GOV.UK Flood Maps.

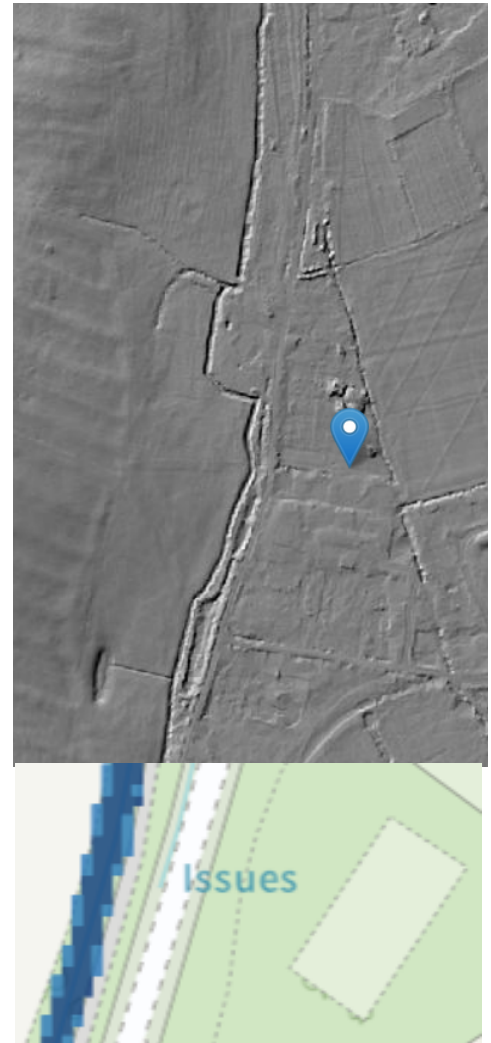


Returning to Hurst Landfill perimeter ditch, although not shown at all on the OS map this ditch is the most prominent feature on LiDAR (right) clearly running north to south, segregating possible contamination from the capped waste landfill hills rising to 45m AOD the west.

Where this major new ditch diverts sharply at “Summerleaze site entrance” around “Old Lodge”, first towards the site then again sharply south, to the north the blocked remains of the Hatchgate Ditch* can just be seen just west of Lodge Road (left of the site marker) preventing onward flow north. To the south leading to more prominent sizeable swales which again peter out blocking onward flow of surface water south.

Degraded and trapped Hatchgate Ditch tributaries bordering Lodge Road Application: 242067 site and Martineau development can be seen to the right of the LiDAR screenshot; these ditches drain nowhere with their extent incorrectly shown on OS mapping.

Further south in the GOV.UK Flood map for planning screenshot (lower right) and subject to Flood Zones 2, and 3, leachate and dissolved gas contamination, the Summerleaze Hurst Landfill perimeter ditch can be seen just to the west of Lodge Road. All natural surface water drainage for central Hurst east of Hurst Landfill ditch is now south across the surface area annotated “Issues” and then east anticlockwise around Church Hill as already described. This includes drainage from Lodge Road, Martineau, the Sawpit area, the new development Little Acre and in due course Application: 253074 Willowmead Fields drainage. Ultimately surface water this Lodge Road area will flow and seep towards Hogmoor Lane.

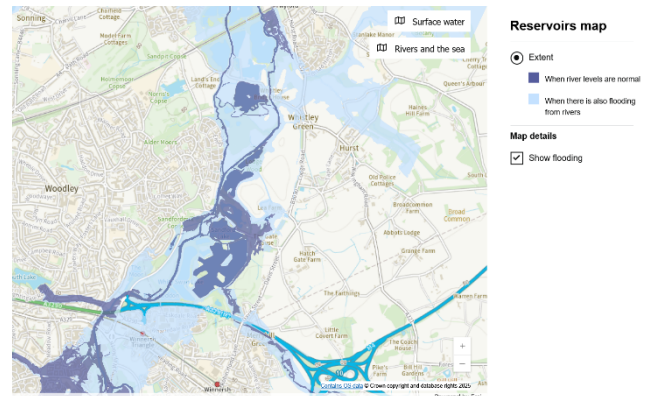


in

Why is this significant ditch feature forming a conduit for fluvial flooding not shown on OS mapping?

Are WBC Planning able to help expedite Ordnance Survey to get this crucial core document and associated online data reviewed, improved and updated for Hurst?

Application: 240583 FRA and FLOODING SEQUENTIAL TEST AND EXCEPTION TEST documents typically made no mention of the official GOV.UK/EA reservoir flood risk from Dinton Pasture's embanked Black Swan Reservoir, with "wet day" flood extent potentially impacting low lying areas of Hurst from Lea Farm and Whistley Green directions. With Hurst Landfill perimeter ditch acting as a conduit for flooding, this probably low but significant flood risk must be considered in the FRA. Earth embankments can be subject to failure, recent examples being on the Shropshire and Basingstoke canals. Also, the possible risk of mindless vandalism or failure of the level-raising stop-log weir cannot be ruled out.



The Applicant's hope to conceal Hurst's BSL reservoir flood risk is normal. Usually, as was the case with Application: 252934, reservoir flood risk is simply not considered by not mentioning it or stating the risk is "low". Alternatively, Applicants have tried to deceive WBC and Hurst residents by patronizingly submitting a reservoir flood map for a random irrelevant area. Recently this has been the case with FRAs for both Application: 240583, and Application: 242067. The "Hogmoor" Applicant submitting a random map of somewhere in Esher Surrey, and the Applicant for the Lodge Road fields plot Application: 242067 submitting a random map of somewhere in Radlett Herts. Hence this initial attempt to conceal relevant flood risk information or mislead regarding reservoirs appears to be standard practice but is surely a risk which should be properly considered for the Flooding Sequential Test and Exception Test?

A typical example of a Developer's intent to avoid considering reservoir flood risk is Application: 242067 "View Plans & Documents" Page 34 "Flood Risk and Drainage Supplemental PoE Ian Walton_Rev01". For appeal the Applicant's "Expert Witness" Mr Ian Walton states: "Factual Error 3.8 The Black Swan Lake is not recognised as a raised embankment reservoir and appears to be a flooded former mineral working." This statement was made in response to a factual Interested Party comment submitted 24 August 2025 but only posted with the planning application documents by WBC Planning on 14 October 2025 - after the Inspector's dismissal decision. It is hoped the procedural irregularities experienced are not repeated by WBC.

The first "Proof of Evidence" to prove that it is "expert" Mr Walton's false "PoE" which is wrong is a screenshot (below) of WBC's own core document Table 5-4 which gives "Dam Type" as "TE Earthfill". This applies to the embankment of around 2m in height which surrounds most of Black Swan Lake, most obvious on the east side above the level of the Emm Brook and to the north. Surface area is given as 260,000 m2 which on the 6 1/4" O/S map looks more like 275,000 m2 water surface area excluding islands.

Table 5-4: Reservoirs within Wokingham Borough. The locations of these reservoirs are shown in Figure 5-4.

Reservoir	Easting and Northing	Reservoir owner	Physical Status	Risk Category	Category	Year built	Surface Area (m²)	Dam Type
Bearwood Lake	477284, 168602	Reading Football Club Ltd	In operation	B	Impoundin g	1860	190,000	TE Earthfill
Black Swan Lake, Dinton Pastures	478074, 172285	Wokingham Borough Council	In operation	Unknown	Impoundin g	1979	260,000	TE Earthfill
Longmoor	478538, 172285	Wokingham Borough Council	In operation	C	Impoundin g	1800	40,000	TE Earthfill

Looking at an earlier WBC core document screenshot (right) the maxim height of the **dam** is given as 2m. Hence if the dam is 2m and the lake has a surface area of 260,000 m2, should the Capacity not be more that the 200,000 m3 stated? Perhaps something more like 300,000 m3?

Suggest WBC as LLFA review the normal Capacity of Black Swan Lake and what figure has been used by the Environment Agency to assess “wet day” reservoir flood risk.

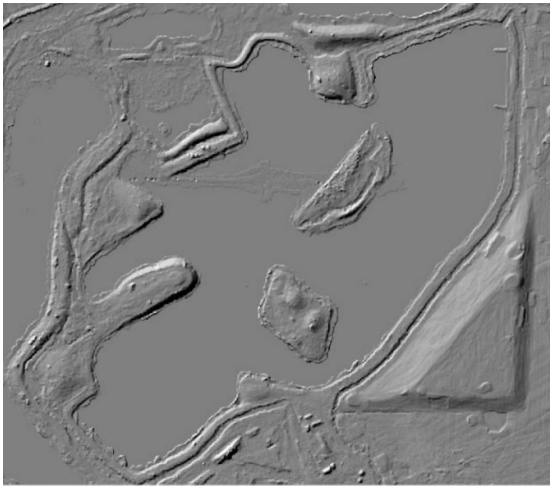


Photos left show the 2m high “TE Earthfill” east reservoir embankment with perimeter path on top surrounding Black Swan Lake holding the lake’s water level above the River Loddon and Emm Brook. (Top left) near the Activity Centre looking south, and (bottom left) at the “doggy” paddling pool south of the Activity Centre where the wooden reinforcement is a metre high with the embankment rising another metre to the path with the higher lake beyond.

The LiDAR screenshot (right) shows embankment, together with raised landscaping features, completely surround Black Swan Lake with the stop-log level-raising weir and and overflow at the northeast of the lake 1km from the proposed Lodge Road site.

Table 4-1: Reservoirs within Wokingham Borough

Reservoir Name	Bearwood Lake	Black Swan Lake Dinton Pasture	Long L...
Physical Status	In Operation	In Operation	In Op...
Situation	Near Wokingham	Near Wokingham	N...
NGR	SU7730068600	SU7810072300	SU785...
Risk Category	B	Unknown	
Undertaker Name	The Royal Merchant Navy School Foundation	Wokingham Borough Council	Woki Bor Co
Category	Impounding	Impounding	Impo...
Year Built	1860	1979	18...
Surface Area (m²)	190,000	260,000	40...
Dam Type	TE Earthfill	TE Earthfill	TE E...
Maximum Height of dam (m)	6	2	
Capacity (m³)	314,000	200,000	70...



The stop-log weir to the northeast of Black Swan lake is shown on GOV.UK Flood Maps for Planning and on Ordnance Survey master maps as “Sluice”. This weir or **dam** (as referred to in WBC core data) is not shown or annotated on normal OS Maps. There is no indication on GOV.UK or OS maps of the raised level and embanked nature of Black Swan Lake or that it is stored water that could be released.

The photos of the weir show that it comprises removeable stop-logs, held in steel slots in concrete pillars with steel sheet piling running into the surrounding earth/gravel embankment.

The 13 Sept 2025 photo to the left shows the lake during dry conditions at the lowest level ever with duckweed in the outflow, and (right) still above the level of a flooding River Loddon. In early March 2026 the higher lake level had recovered to more than 1m.



There is no “sluicing” or significant flow going on here, the stop-log weir is acting as a dam raising the level of Black Swan Lake and should surely be shown as a “weir” on normal OS maps where no dam or weir is shown at all.



In summary, Black Swan Lake is definitely recognised as a raised embankment EA reservoir within Wokingham Borough by WBC and is a much loved and appreciated amenity. However the raised landscaping and embankment of this reservoir has displaced River Loddon floodplain and now helps to retain pluvial flooding to the east within Hurst as well as being a stored water flooding risk.

Black Swan Lake is not merely “a flooded former mineral working” to be ignored by a Developer who does not want to include it in their FRA as a potential Flood Risk weighing against passing a sequential test.

No risk category is provided in Table 5-4. When Black Swan Lake was first built Hurst was more sparsely populated and gravel working still in progress, hence for mainly agricultural land and gravel workings at risk the flood risk was probably considered relatively unimportant. With the subsequent further loss of floodplain to 50ha of Hurst Landfill hills and the subsequent building of 150+ new low-lying dwellings in Hurst, now is perhaps the time to reassess the risk.

Application: 260353 needs to include Black Swan Lake flood risk with wet day flood risk extent already reaching the 5HU030 site and with the likelihood the 200,000 cubic metres volume of stored water is an underestimate.