

## Peter Boros Home

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**From:** Peter Boros Home <[REDACTED]>  
**Sent:** 20 December 2020 19:33  
**To:** 'Bowerman, Emma'  
**Cc:** 'Polly Reynolds'; 'mark.stone [REDACTED]'; 'David.Bretherton [REDACTED]'; 'Anne-Marie [REDACTED]'  
**Subject:** P20/S2808/DIS, Thames Farm Drainage Condition 11

Emma,

I write further to the above matter, and without prejudice to my earlier comments regarding the non-material variation application and approval which brought forward the commencement of the scheme as well as the mechanism now being used for the consideration of this condition 11 via reserved matters discharge as opposed to a Material Variation application.

I believe the following is an accurate summary of the material contained on the web portal in relation to this application, but if I am wrong no doubt you will point this out.

### **Forestry**

*"I have considered the position outlined in the additional information provided by the applicant on 6 October 2020 and this does not alter the view expressed in my earlier consultation response. An Arb Impact Assessment and Arb Method Statement is required to enable an assessment of the impact on any significant off-site trees".*

This has not been prepared.

### **EA**

*"This planning application is for development we do not wish to be consulted on. Please see the attached which was issued to your council to screen applications before sending to us".*

### **OCC (LFFA)**

No visible comment on the portal but OCC has commented via email to a local Councillor:

*"We can assure you that the drainage scheme submitted for the discharge of the drainage condition associated with this application has and is being given full scrutinization and consideration against the required standards".*

Obviously because of the lack of detail submitted as part of the application, not a lot can be fully scrutinized at this time.

### **SODC Drainage**

*"In general, it is considered that the discharge option to the Lash Brook is higher in the drainage hierarchy as this would avoid discharge to what would effectively become a combined sewer, however as either option will be wholly adopted by Thames Water and the proposals will need to be constructed to Thames Water standards, it will be for Thames Water to decide how this discharge is best accommodated.*

*We would therefore recommend that this condition is not discharged until Thames Water have confirmed that the report suitably covers all off-site works requirements.*

*I trust the above is of assistance, however if you have any queries, please let me know".*

This confirms that the condition should not be discharged until the report and detail submitted suitably covers off-site works requirements.

### **Thames Water**

*"Thames Water are happy in principle with what has been agreed with the developer - provision of a new surface water system from the site to the Lash Brook. This is based on an 18 to 24 month timescale and as stipulated under Condition 11, no discharge from the site occurring before the drainage strategy has been completed and brought into use. If there is any change to this strategy,*

*Thames Water would need to be consulted".*

This confirms that all that has been submitted as part of the application is the concept of a new surface water system off site. There is no off-site detailing whatsoever.

### **SODC Planning**

1. No visible report or recommendation or substantiation of what SODC previously proposed doing before local residents complained just prior to 23 October exists on the portal.
2. No visible comment regarding Environmental and or ecological impact of proposals nor the effects of on-site works to the aquifer lying beneath the site or the effects of capturing and moving surface water from this catchment area to a different catchment area a mile away exist on the portal.
3. No visible comment regarding the substantial variations that this scheme requires on site viz: Major engineering works to grout the site with cement and ash mixture to great depth and associated vibro-compaction; omission of public realm and s106 benefits, addition of pumping stations and associated wet and dry wells, addition of major structures on site for water catchment and storage.
4. There is also inadequate/no detail of the necessary on-site changes brought about by the drainage concept proposed which are many and varied and inter alia include information regarding the matters above, both in terms of how they will be achieved, whether they can indeed be achieved at all, and what the consequences of carrying out that work would be either in principle or in detail.

### **Taylor Wimpey**

FRA requested within 4 weeks of 23 October (allowing 2 further weeks for comment by consultees) – not yet produced and inference recently that further work is being done to examine alternative routes as stated in a letter to all residents 04/12/2020.

I further understand that Taylor Wimpey are re-looking their entire drainage strategy and are unlikely to have completed this until next spring hence will not be submitting anything till then, and which may in fact be a wholly different approach methodology different route.

You will also be aware that I am Chair of the Thames Farm Action Group which represents the interests of in excess of 1,100 residents whom have signed a petition objecting to this proposal.

Please be aware, that we continue to have major concerns about this application and how it is being both addressed and managed within SODC and also by the Consultees responsible for checking the proposals both on and off site such as they currently exist. This includes validating that the scheme is fit for purpose, certifying that the scheme will not cause any additional flooding, both on and around the Application site and also at the currently proposed point of discharge (albeit that it would seem that both the proposed route and discharge points may be the subject of further variation by the applicant).

These proposals are in a state of flux and provide insufficient detail for the proposals to be properly considered and assessed, as specifically confirmed by the various statutory consultees as above. This includes the on-site detailing of the consequential changes to the basic development scheme which are significant and constitute Material Changes and Variations, all of which would be a direct consequence of this drainage strategy, and hence it is implicit that the drainage strategy needs to be considered simultaneously as the physical changes to the proposed scheme. The strategy itself is not sustainable if the physical changes required are unacceptable, and thus it is inconceivable that such a radically different strategy can be considered in isolation. The new structures required on site; the methodology and consequences of grouting and the omission of a number of public realm and/or s106 benefits all need to be considered together as the strategy fails without any one of them.

A similar position applies to the proposed outfall location where there is no detailing of the outfall or any environmental ecological or physical impacts nor any hydrological impacts at either end of the pipe.

Nowhere in the proposal is there any detail of what is proposed off site which cannot be correct. The discharge of a condition must provide sufficient information and not be stated as being by reference

to what may or may not be acceptable to Thames Water as a concept, as the hierarchy of drainage already sets out these concepts.

I quote from Thames Water “provision of a new surface water system from the site to the Lash Brook”. That is simply a concept or idea – one of the hierarchy that is already implicitly defined as acceptable.

If this was all that was required, then no reserve matters discharge would be necessary and so cannot be correct.

This solution may or may not be capable of being implemented or constructed and may or may not be feasible in this location, and certainly does not provide the level of detail necessary to check and validate that the proposal is feasible or viable or capable of being implemented. It also does not consider the on-site Material Variations that should be properly considered as part of the application.

You have advised that “Application P20/S2808/DIS will remain open for Taylor Wimpey to consider their options and submit further information in 2021”.

The applicant has failed to provide anything like sufficient information for this condition to be properly assessed and validated for discharge. There are also other implications of this proposal that need to be considered. The applicant is now reviewing its entire drainage strategy. Please can you advise why it is therefore, that what is no more detailed than a conceptual solution, described and already validated

by the hierarchy, is to remain in situ whilst the applicant considers a variety of other alternatives? At the present time, this application is no more than a request for reiterating the acceptability of a drainage

concept that is already recognised and catered for in policy. The Application should therefore be refused for the reasons given above forthwith.

I also note that you have not agreed to the request made by our solicitor for an extension of time for the residents to consider and comment upon the/a FRA once it has been received, despite the fact that a

variety of extensions have been agreed to for other persons including the Applicant. The Applicant is now also reviewing its entire drainage strategy for the next 3-4 months.

Your approach therefore would seem to be wholly inequitable. It is quite apparent that this is a hugely complex and difficult matter and to date we have your commitment to give only 14 days for residents to comment, which bearing in mind that the residents are not an organisation used to doing such things, and need to appoint advisors whom are expert in this field and available to turn matters around in

a very short period. This is so that residents can then review that advice and make decisions about a response. This appears to be a somewhat biased position in favour of the applicant who has had the last

15 months to marshal its resources, consider the options and provide a solution, all of which it has not actually done yet and is now likely to require a further 4 months to do so.

In the interests of equity, transparency and good governance, please reconsider your position on the request for more time for a response to the FRA, as well as the matter of now rejecting the Application for the various inadequacies and reasons set out above. Finally, the on-site and off-site changes to the scheme consequent upon this radically different drainage solution are significant and material variations to those

identified at the time of original application/appeal and also each subsequent application to discharge whether approved or withdrawn following consultation. The new structures required will displace other parts

of the development and will not be invisible nor have allotments and play areas floating in the air above them, and are an intrinsic part of approving the strategy.

I look forward to hearing from you.

Peter Boros  
Chairman

Thames Farm Action Group

