

Thames Farm Action Group
Rambler Cottage, Reading Road, Lower Shiplake, OXON RG9 3PH

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By Email only

Dear Emma,

Reserved Matters Application no. 2 ref P20/S2808/RM-HAR

Please find attached a further report from JBA regarding the latest submission from Taylor Wimpey re Thames Farm Drainage Strategy/Condition 11 discharge.

You will see that many of the comments and content refer back to JBA's previous reports on this subject matter, as well as a report from HR Wallingford who are advising Henley and Harpsden on flooding issues. The report should therefore be read in conjunction with those documents and their findings as well, as there has been a series of documents circulated and updated to arrive at the current submission. The earlier reports are appendices within this latest report for ease of reference.

To remind ourselves of condition no. 11 of the consent and its subsequent amendment, I set this out below, again for ease of reference, albeit it must be viewed in the context of the entire consent document and the framework of subsequent approvals/rejections/ withdrawn applications:-

"No development shall commence until a drainage strategy, detailing all on and off site surface and foul drainage works, has been submitted to and approved in writing by the local planning authority. No discharge of foul or surface water from the site shall occur before the drainage strategy has been completed and brought into use."

This wording was subsequently modified by Approval to P20/S1303/NM to read:

"No development shall commence (save for the access works shown on drawing A253-278-1500 P13) until a drainage strategy, detailing all on and off-site surface and foul drainage works, has been submitted to and approved in writing by the local planning authority. No discharge of foul or surface water from the site shall occur before the drainage strategy has been completed and brought into use."

Reason: to safeguard the water environment and to prevent flooding of the area"

In addition to presenting you with JBA's report, we wish to highlight some key issues for SODC and its Consultees to consider/take into account:-

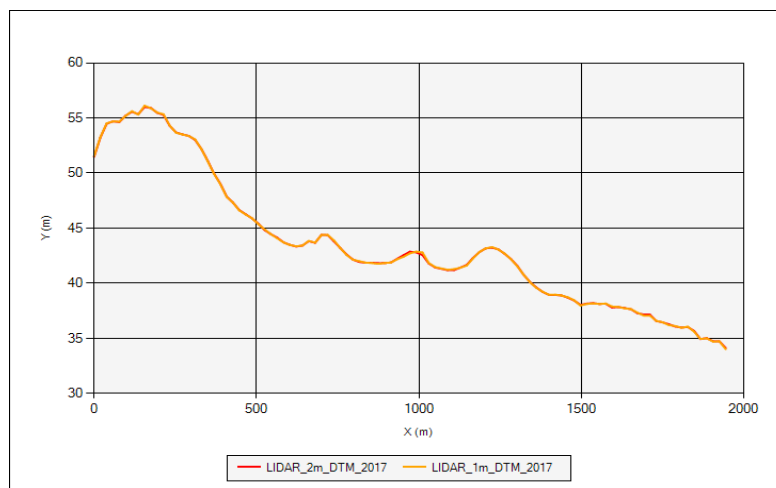
1. SODC specifically requested that Taylor Wimpey submit a full Flood Risk Assessment for its drainage proposals. The documents submitted do not include or comprise such an Assessment and are deficient when compared to the criteria set out by OCC (as LLFA) in their guidance - LOCAL STANDARDS AND GUIDANCE FOR SURFACE WATER DRAINAGE ON MAJOR DEVELOPMENT IN OXFORDSHIRE V1. November 2018. Indeed, the flood risk appraisal submitted, seems to have deliberately set itself to not cover all the requirements of a formal FRA. In section 4.1 is stated that "The development would only be compatible with NPPF and PPG ID: 7 after the completion of a satisfactory Flood Risk Assessment, inclusive of mitigation measures and a Drainage Strategy." It is, therefore, surprising that an FRA has not been submitted given your specific request of the Applicant.
2. As also highlighted by Thames Water, due to the sensitivity of this location, which is a Source Protection Zone 1, they are unable to support the discharge of condition 11 until details of how the "water

environment” (particularly groundwater) will be protected throughout each stage of the site development (i.e. including the required ground stabilisation for development).

3. The documents submitted do not provide the required detail for Thames Water or anyone else for that matter, to fully assess ground stabilisation. The ground stabilization is referred to as a precursor to the construction on site of the necessary infrastructure and then the housing development itself. The concern is that the development is in Source Protection Zone 1 (SPZ1) of Thames Water’s, strategic groundwater abstraction, and so they require the developer to confirm appropriate mitigation measures to ensure the water abstraction source is not detrimentally affected by the proposed development before, during and after its construction.
4. As previously confirmed, we do not believe that the current documents comprising the latest submission are capable of allowing the condition to be safely discharged, and they leave a very considerable number of important queries and questions unanswered. It would therefore be unsafe for SODC to determine and/or approve the Application in its present form particularly knowing that this is the last condition of a series to have been discharged prior to development occurring. We are also of the opinion that SODC do not have any mechanisms within it’s control to require any further approvals/submissions to be required/made by the Applicant, and could only deploy development control mechanisms after the development is underway once again, where an issue arises on site. **Given the above uncertainty, SODC must reject the current application or invite the applicant to submit the necessary information to address those issues.**
5. Whilst technically and legally there may be a way by which the developer can connect their drainage to existing water courses that are distant from the subject site, that does not in any way guarantee the future maintenance position of the ‘new system’. The route taken for the connection and thereafter for the flow downstream is across land in various people’s ownership and there is no legal right to maintain what is already a blocked and defective series of routes/water courses. Equally there is no reliable compulsion on riparian owners to actually proactively and positively maintain the route as free flowing. Works of maintenance whilst technically the responsibility of ‘riparian’ owners practically will only be undertaken reactively and under duress if at all. It is inevitable therefore that the proposals will cause long term problems and lead to flooding of land and or houses/public highways and means of access. This is not an acceptable solution either for the intended residents of the development nor other land owners and residents elsewhere who will be subjected to the long-term effects of the proposed solution. A robust and clear method of maintenance must be part of the drainage solution proposed and the necessary means of maintenance proven as legally enforceable and deliverable in a timely fashion. A residual obligation on public resources/providers is wholly inadequate.
6. The proposed strategy can in no way be considered to be a SuDS compliant or even a SuDS based solution, nor does it seek to bring about any meaningful SuDS based features. Indeed, a number of elements/features run contrary to the principles of SuDS.
7. Peak run off figures in the documents do not account for a whole series of inter-related issues not least of which is the impact on ground permeability and subsequent run off of the proposed ground stabilization works. Extra run-off due to compaction and grouting would either prematurely fill the site’s drainage and attenuation systems, or lead to increased surface water run-off escaping the site in an uncontrolled manner on to Reading Road. This is already known to occur and result in large scale ponding along the Reading Road. Over flows into the properties sited along the east side of Reading Road then occurs. This is a dangerous and unacceptable outcome were this proposal to be approved.
8. Section 5.17 states that site-wide offset of soakaways by 10m from all structures (to prevent solution features forming close to buildings) was not feasible as it would not have been possible with the approved

layout. This may be true, but no mention is made of considerations to change the layout to account for the findings of the ground investigations. Indeed, the layout is such that it directly interferes with the natural site flows of water and the 2 primary flow corridors.

9. During regular, minor rainfall events, runoff from the majority of the development's estate roads and all roofs will flow straight to the pumping station and thence to the River Harp. This does not demonstrate adequate design for water quality, and will lead to surface water discharges from the site even during minor rainfall events. Given that the pre-development nature of the site is one of largely permeable soils and bedrock, this is a significant change to the site hydrology and therefore not in keeping with the principles of SuDS, which seeks to achieve drainage systems which as closely as possible reproduce the natural hydrology of the site. The design therefore is not compliant with the principles of SuDS as set out in the NPPF, in the Lead Local Flood Authority's guidance and in the SODC Local Plan (policy EP4).
10. Apart from money/cost, there seems no reason why a pumped system has been selected over a gravity fed arrangement, given that the levels are arranged such that a gravity fed system would be achievable. There is zero evidence of any whole life costing being employed on the alternative solutions. The levels data from pumping station to outfall is shown in the table below:



Such a pumped system is contrary to Thames Water's 'Net Zero' objectives and counter to the sustainability objectives of SODC and others.

11. There is no up to date Hydrogeological Impact Assessment. The one from April 2020 does not deal with the current Drainage Strategy submission at all, and dealt with a wholly different set of proposals.
12. There is inadequate information regarding the water table height on the site as compared to that at the local borehole. There is no information regarding the proposed grouting and ground stabilization works that are proposed nor any modelling thereof. There is no groundwater monitoring data over time that has been submitted. There is therefore no method by which SODC and its consultees, can fully and properly consider this aspect without it being submitted as part of a wider material variation application or extending the scope of this RM Application.
13. Despite its request of the Applicant to submit a separate Planning Application for the Groundworks, this has not been provided. SODC cannot, therefore, determine this Application unless and until it receives the additional necessary information about the proposed groundworks. SODC has acknowledged, that it cannot force the applicant to submit a separate Application for Groundworks

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The legal advice received by TFAG is :-

“The LPA can approve the RM application provided that the details/information provided fall within the scope of the OPP and satisfy their concerns, and together with any of those raised by the statutory and other consultees. However, if the LPA has any doubts/concerns, or the details are not sufficiently clear upon which to reach such a decision, they should refuse the application.”

14. There is no detail of the proposed grouting of the site, showing the depth to which grouting and compaction work would be undertaken, how this sits in relation to the water table at the site, and what impacts any residual voids under the site will have once the development is carried out. There is no detail of the timescales that would be involved, the scope of the engineering works nor the likely impacts on either the site, residents other land and highway safety issues.

Moreover, it is well known that voids exist on site down to a depth of c 15/16m. If the water table is at a depth of 10m, and grouting works are to go no lower than 8m, will such an arrangement lead to further sink holes appearing at a later date or other structural instability that might give rise to extensive differential settlement and damage to people, property and the constructed development's infrastructure?

Given the above matters, the comments of Thames Water, the JBA reports and other reports from HR Wallingford, we request that SODC either refuses this application as providing insufficient information for all issues to be properly considered. Alternatively, SODC may choose to request that the Applicant makes good these deficiencies in their application, and provides a comprehensive suite of documents to address all issues including seeking approval to all material on site variations it proposes, particularly those relating to onsite water storage, attenuation features, and also the long-term methods of maintenance thereof as well as the off-site elements.

Peter Boros

Signed Electronically

Chairman,
Thames Farm Action Group