

Emma Bowerman
Principal Major Applications Officer
Planning Department
South Oxfordshire District Council
135 Eastern Avenue
Milton Park
Milton
OX14 4SB

4th August 2021

Dear Emma,

Re: P20/S2808/DIS – Thames Farm, Shiplake

I am writing on behalf of Henley-on-Thames Town Council to raise the following concerns and objections regarding the flood risk appraisal and drainage study (Enzygo study) submitted by the developer of the above site for the discharge of condition 11. These concerns are only discussed here in brief, and should be read in conjunction with the more detailed analysis in both the HR Wallingford (HRW) and JBA Consulting (JBA) reports appended to this letter.

- (a) **Flood risk from short intense rainfall.** As highlighted in both the HRW and JBA reports, the Enzygo study does not assess the impact on the flow rate along the proposed northern watercourse as a result of short intense rainfall, which will increase flow volumes by a factor of up to 3.5, and would likely lead to additional flooding at the sports pitches at Jubilee Park and property and houses further downstream. Jubilee Park has been identified by both South Oxfordshire District Council and the Town Council as a site for a new artificial sports pitch, necessary to meet future needs and the District Council's strategic aims, and the risk of flooding as a result of these proposals would likely jeopardise those plans.
- (b) **Climate emergency.** It should be noted that the above figures are based on current rainfall and flooding patterns. South Oxfordshire District Council has declared a climate emergency and, as such, recognises that these incidents are likely to worsen in both intensity and frequency. The Enzygo study makes no allowance for this.
- (c) **A4155 culvert.** As also noted in the HRW report, flooding at Jubilee Park and further downstream is currently mitigated by the obstruction at the A4155 culvert which acts as a throttle and causes flood water to back up on the field to the west of Jubilee Park. The clearance of this culvert necessary to facilitate the proposals will further impact on flooding of sports pitches and residential properties downstream.

- (d) **Thames discharge point.** The proposal is inaccurate and misleading in showing the finish of the pumped water course as being south of the Mill Lane residential properties, and not identifying the discharge point into the Thames. In reality, the watercourse continues north to the Thames downstream of the weir at Marsh Lock, through six private gardens of homes in Mill Lane. The gardens have a number of restrictive bridges and stepping stones. The stream is prone to flash flooding which can affect Mill Lane itself. Any additional water introduced by pumping will likely result in further flooding.
- (e) **Mill Lane stream water quality.** The HRW report notes that there is currently high-quality water flowing through the stream that runs through the properties on Mill Lane. The stream is currently totally clear, and an important habitat – full of fish, wildlife and plants, all of which could be at risk by the large increase in surface water from the development, including pollutants from the cold starting of cars, herbicides, car oil and paint solvents, as well as an additional c.200m of run-off from the A4155. This will be further impacted if the sediment that helps filter the water is removed from the A4155 culvert to the west of Jubilee Park. The proposals will undoubtedly upset a very delicately balanced ecosystem with potentially disastrous results.
- (f) **Riparian ownership duties.** As riparian owners of part of the proposed watercourse we have the right under the Land Drainage Act 1991 to receive the flow of water in its natural state, without alteration. In addition, whilst we have a duty to maintain the natural flow of the watercourse, there is no obligation to cater for increased flows resulting from works carried out upstream such as a new housing development. However, there is no mention in the Enzygo study of how, considering point (a) above, any required improvements will be met.
- (g) **Future waste water / surface water misconnections.** The HRW report also raises concerns that any future misconnections between the waste water and surface water systems will not be captured, as sustainable drainage systems (SuDS) will not be in use.
- (h) **Changes to aquifer.** The HRW report also states that the Enzygo study does not reference any discussions with the Environment Agency regarding the management of risk of pollution and the changes to the source protection zone (SPZ) 1 aquifer below the site caused by the proposed grouting operations. This concern has also been highlighted by Thames Water.
- (i) **Uphill run-off.** The HRW report states that the Enzygo study makes no consideration of the overland runoff from uphill of the site or management of the flows that exceed the capacity of the drainage system.
- (j) **Existing surface water flow pathways.** The JBA report notes that two existing flow pathways running west to east through the development site have been identified, but that neither the site layout nor the drainage arrangements are designed around these pathways, contrary to SuDS drainage principles.
- (k) **Options assessment.** Whilst the Enzygo study assesses four potential surface water options, the HRW report states that this assessment is weak and does not include a rigorous appraisal of the relative merits and difficulties of each of the options.

- (l) **Sustainability and carbon emissions.** The adoption of a pumped surface water system by Thames Water would be contrary to their position on becoming carbon neutral, and South Oxfordshire District Council's climate emergency declaration. As the JBA report notes, there has been no consideration of a gravity sewer alternative and evidence of a whole-life costing or hydraulic calculations to justify the selection of a pumped system. The proposed scheme will also require Thames Water to adopt highways drainage infrastructure, contrary to its current policy, and will likely require a high level of maintenance relative to other potential options. Therefore, the proposals do not represent a sustainable long-term solution.

It is clear from the findings of both the HRW and JBA reports that the proposals are contrary to current planning policies, including:

- (a) **Local Plan INF4: Water Resources.** It has not been demonstrated that there is adequate surface water capacity off-site.
- (b) **Local Plan ENV4: Watercourses.** It has not been demonstrated that the proposals will protect or enhance the watercourse and its biodiversity. On the contrary, we have demonstrated that they will be wholly damaging.
- (c) **Local Plan EP4: Flood Risk.** The proposals will increase the risk of flooding elsewhere; provide no wider environmental benefits in relation to flood risk; do not meet the expectation that SuDS will be incorporated into the development; and therefore do not seek to enhance water quality and biodiversity in line with the Water Framework Directive.
- (d) **National Planning Policy Framework para.169.** The developer has not provided clear evidence that SuDS is inappropriate, and SuDS should therefore be incorporated.

In accordance with the HRW and JBA reports, the Town Council remains convinced that infiltration SuDS, enabled by a lower-density development, is likely to provide the most appropriate and sustainable drainage solution, and will most closely reproduce the natural hydrology of the site. It would provide multifunctional benefits; reduce pollutants in the water; and help protect water quality and biodiversity. SuDS is widely used across the area and yet has not been adequately considered in this instance.

In summary, the Town Council believes the proposals to be entirely inappropriate and based on weak and incomplete research that lacks clarity. The proposals are highly likely to cause long-term damage to the environment and property, when other sustainable and suitable solutions are still to be explored. We would therefore strongly urge you to reject the proposals.

Yours sincerely,



Sheridan Jacklin-Edward CertHE FdA BA MA PSLCC
Town Clerk