

Application no: P20/2808/DIS-2/3

Location: Land at Thames Farm Reading Road Shiplake

Lead Local Flood Authority

Recommendation:

Objection to Discharge of condition 11 (Drainage) on planning application P16/S0970/O

Key issues:

- Thames Water objection reference; DTS Ref: 37121, UPDATED 30 JUN 21.
- There is still not a viable outfall that has been demonstrated.
- Additional information required is noted in the McCloy Review and must be provided to LLFA and SODC.
- Objection as per points contained in “Detailed Comments” below.

Detailed comments:

The revised scheme has been assessed with consideration to the following reports:

Enzygo Technical Note (reference SHF.1850.001.HY.R.001.A November 2020),
Thames Farm - Hydraulic Modelling Report - March 2021
(SHF.1850.001.HY.R.002.B),
Thames Farm - Soft Bed Assessment (SHF.201.088.HY.N.001.A)
Abbey Letchford Partnership Drainage Strategy report (reference A253-R001 v11 – dated 16 March 2021).
H. R. Wallingford Thames Farm Development – FRA and Drainage Proposal Review (reference FWM8833-RT001-R02-00. Dated July 2021.)
McCloy Consulting, Discharge of Condition 11 – Review. (Reference: M03174-01_DG01. Dated: September 2021.)

The following comments have been authored in partnership with SODC Drainage Team and Oxfordshire LLFA:

South Oxfordshire District Council's engineering services team and Oxfordshire County Council's Lead Local Flood Authority team have appointed McCloy Consulting to undertake a comprehensive independent review of the above referenced reports.

We (SODC Drainage Team and Oxfordshire LLFA) are supportive of the conclusions set out in the McCloy Consulting Review and as such recommend objection to the discharge of Condition 11.

The following comments consider the recommendations made in the independent review undertaken on behalf of OCC LLFA and SODC by McCloy Consulting titled, "Discharge of Condition 11 – Review." Reference: M03174-01_DG01. Dated: September 2021. The "Review."

It is not the purpose of this response to replicate the comments made in the "Discharge of Condition 11 – Review," document. To this end The Review has been placed in the public domain and is to be considered material evidence in supporting SODC Drainage Team and Oxfordshire LLFA position.

In conjunction with the above "Key Issues" reasons for refusal to discharging of condition 11, are the following points that require addressing:

The FRA does not take into account the following in determining whether the site is in compliance with planning policy:

- Change in overland flows and reduction of site potential to infiltrate caused by proposal (grouting and vibro-compaction of the site).
- Flood risk caused by infrastructure failure of the pumping station or pumping main
- Flood risk to the Northern Watercourse
- The Enzygo report does not confirm if the revised proposals comply with National or Local flood risk related planning policy.
- No calculations or evidence have been presented to validate or acknowledge the presence of an overland surface water flow route.
- The Review clearly notes it; does not accept the assertion by the CEC FRA (Para 3.10) or the ALP Drainage Strategy (para 4.5) that the development will reduce flood risk from overland flow sources to sites downslope of the site. The reviewer also considers that overland flow has not been adequately considered by the drainage design and that the volume of flow contributing to Northern Watercourse via pumping main may also be under-represented by the flood study.
- No calculations are provided to demonstrate that there is sufficient capacity within the drainage system to contain the (critical duration) rainfall events.
- OCC LLFA consider that the current modelling study does not fully justify that there will be no increase in flood risk elsewhere and that the effects of the additional flow (8.5l/s) generated by the development may be drowned out by the flood level in the Thames for the scenarios considered by the Enzygo flood study.
- The LLFA requests the hydraulic modelling be updated in line with the recommendations contained within the Review.
- Detail Required for Standard Detailed Design Condition: The submission fails to provide the level of detail stipulated by the LLFA Checklist F.
- A SuDS approach has not been applied in accordance with OCC Local Standards and SODC: South Oxfordshire Local Plan 2035.

Conclusions:

- Whilst the flood study indicates that the effect on the northern watercourse is imperceptible for the events modelled, further modelled runs should be undertaken to assess the effect of flood extents from lower order return events. This is to assess the affect the proposed discharge would have on the potential for nuisance flooding, i.e., increased frequency or magnitude.
- The conveyance route issue raised by HR needs to be clarified with suitable supporting information provided to resolve this matter.
- The applicant must provide evidence that permission to discharge has been agreed with the relevant landowner(s).
- Calculations should be provided to confirm suitable mitigation is in place in case of pump failure.
- Further detail on overland flow paths and consideration for rainfall on vegetated areas should be provided.
- Consideration should be provided to the potential for flooding associated with the surface water flow route indicated on EA surface water flood maps.
- Calculations should ensure that the critical event is fully assessed, and network node information should be confirmed on a plan.
- The submission fails to provide full details stipulated by the LLFA Checklist F and further information should therefore be provided.
- A SuDS approach has not been applied fully in accordance with OCC Local Standards and South Oxfordshire Local Plan 2035 and this should be addressed.

As per the recommendations contained within the Review the LLFA request that the Review report be used as a basis for the applicant to reconsider their drainage proposal and flood study and provide a more detailed / complete submission for the LPA and LLFA to consider.

Officer's Name: Adam Littler - Flood Risk Engineer (South and Vale)

Officer's Name: David Bell – South Oxfordshire District Council

Date: 12 October 2021