



Ministry of Housing,
Communities &
Local Government

Mary Mescall
Environmental Planning Director
Stantec UK Limited

Please ask for: Mike Hale
Tel: 0303 444 8050
Email: Mike.hale2@communities.gov.uk
Your ref:
Our ref: PCU/EIASCR/Q3115/3347775
Date: 25 October 2024

Dear Mary

**Request for a Screening Direction
Town and Country Planning (Environmental Impact Assessment) Regulations 2017
Proposal for: ground stabilisation works at Thame Farm, Shiplake, Oxfordshire**

I refer to your request dated 4 July, made under 6(10) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017(S.I. 2017/571) ("the 2017 Regulations") for the Secretary of State's screening direction on the matter of whether or not the above development is 'EIA development' within the meaning of the 2017 Regulations.

The above engineering operation falls within the description at paragraph **10b) and also 13b)** of Schedule 2 to the 2017 Regulations. Since the proposal exceeds the threshold in column 2 of the table in Schedule 2 of the 2017 Regulations, the Secretary of State considers your client's proposal to be 'Schedule 2 development' within the meaning of the 2017 Regulations.

Having taken into account the selection criteria in Schedule 3 to the 2017 Regulations the Secretary of State considers that the development is likely to have significant effects on the environment, see the attached written statement which gives the reasons for direction as required by 5(5) of the EIA Regulations.

Accordingly, in exercise of the powers conferred on her by regulation 7(5) of the 2017 Regulations, the Secretary of State hereby directs that the proposed development described in your client's request and the documents submitted with it, **is 'EIA development'** within the meaning of the 2017 Regulations.

Any application for planning permission for this development must be accompanied by an Environmental Statement. Under regulation 2 of the 2017 Regulations, an Environmental Statement must contain, for the purpose of assessing the likely impact on the environment, the information specified in that regulation. I recommend that you refer to the Regulations before and during the preparation of the Statement.

Planning Casework Unit
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I am sending a copy of this letter and written statement to South Oxfordshire District Council.

Yours sincerely

M A Hale

Mike Hale

Head of Environmental Casework

This decision was made by officials on behalf of the Secretary of State, and signed on her behalf

Town & Country Planning (EIA) Regulations 2017
Secretary of State Screening Direction – Written Statement

Application name:	Proposed ground stabilising works associated with the following planning permissions; 95 dwellings on appeal APP/Q3115/W/16/3161733 (P16/S0970/O) and reserved matters (discharged) (P19/S0245/RM) at Thame Farm, Reading Road, Shiplake, Oxfordshire
SoS case reference:	PCU/EIASCR/Q3115/3347775
Schedule and category of development:	10 b) Urban development project and under 13(b)

Full statement of reasons as required by 5(5)(a) of the 2017 EIA Regulations including conclusions on likelihood of significant environmental effects.

The Secretary of State has considered whether the above proposal is likely to have significant environmental effects. She has undertaken this screening taking into account the criteria set out in Schedule 3 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. In doing so she considers the main matters to be addressed for development of this type are ordinarily those set out in Planning Practice Guidance (PPG), including with regard to cumulative impact to be the physical scale of such developments, potential increase in traffic, emissions and noise. However, the request relates to works later identified as necessary to implement outline planning permission for 95 dwellings on appeal (2nd August 2017) (P16/S0970/O) for which reserved matters have been discharged (P19/S0245/RM). The planning permission has been implemented through the construction of the access to the site. Subsequent to these consents the applicant identified a requirement for works to stabilise the site's underlying chalk geology. Such ground stabilisation works are an engineering operation and therefore require planning permission although ground stabilisation is not specifically mentioned in the EIA Regulations.

For the proposed ground stabilisation works, consideration on whether the development is EIA development, on the facts of this particular request, relate largely to the potential for the works to impact the water environment. No other significant effects have been identified in relation to the main matters set out in PPG for this project on any other issue. Furthermore, although in cumulative terms the residential development would follow the grounds works, significant cumulative impact on any issue considered is unlikely. The Secretary of State has also taken into account the fact environmental consideration featured in the appeal decision for the residential development to follow and that prior to the need for the ground stabilisation works being identified, satisfactory mitigation for the residential development to follow was provided during the planning process, including through conditions.

1 (a) – (f) regarding characteristics of development

The residential planning permission has been implemented through the construction of the access to the site. The proposed development comprises ground stabilisation works. The

works consist of compaction grouting which involves injecting a dense mortar grout into the ground to re-densify loose, granular areas of the ground, thereby reducing pore spaces and improving the ground strength. Before ground improvement works start, topsoil will be excavated and stockpiled on the site. The compaction grouting works comprise drilling a series of boreholes across identified areas at approximate 3-metre spacing and injecting a stiff mix grout to provide strength and compaction of the weakened subsurface.

The area of the site to be grouted is estimated as 11,000 square metres, of a total of 56,000sqm. The upper 3m of the soil profile will not be affected by grouting. Following compaction grouting, the shallower soils across the site (<3 metres depth) will be compacted using dynamic compaction methods where necessary to recompact any soft spots (i.e. areas affected by dissolution features) to densities similar to unaffected ground conditions. Once the compaction grouting and dynamic compaction is complete, the topsoil will be replaced across the site.

While uncommon ground stabilisation works are not unusual or an untested activity associated with development. Upon completion there will be no additional physical changes to the topography beyond that associated with the residential development to follow the ground stabilisation works, with the change from these works below ground.

2 (a)-(c) (i) – (viii) regarding location of development

There are no statutory ecological designations located on or directly adjacent to the site. Harpsden Wood Site of Special Scientific Interest and area of ancient woodland is the closest site at approximately 500m to the north west. There are no Local Nature Reserves, Special Areas of Conservation, Special Protection Areas within 5km.

There are no designated heritage assets on or adjacent to the site. The Grade II Listed Building 'Lower Shiplake War Memorial' is 200m south of the site. Approximately 550m to the north east is Grade II Listed Building barn. There are no World Heritage Sites or Registered Battlefields on or within 5km of the site.

Given the nature of the proposed works and short-term duration, the site is considered to not be sensitive in this regard. However, the site is classified as a Secondary Aquifer. The site is also in a Zone 1 – Inner Protection Area of a groundwater Source Protection Zone and an Environmental Permit would likely be required for the works. Further the Environment Agency (EA) indicates the site is around 135m from a borehole for public water supply. EA further indicates Zone 1 is defined by a 50-day travel time for pollution from any point below the water table to reach the abstraction source (See Water Resources below).

3(a) –(e) regarding characteristics of potential impact

Water resources

The Lead Local Flood Authority (LLFA) and LPA Senior Flood Risk Engineer (SFRE) indicate the proposal for grout stabilisation on this site will have an effect on surface water runoff from the site and how this will be discharged.

The works forming the stabilisation application therefore have the potential to affect above and below ground water in terms of surface water infiltration / run-off and groundwater

flow; as well as the potential for effects on public water supply (a groundwater abstraction for public water supply is close to the site).

A Flood Risk Assessment (FRA) and a Hydrogeological Impact Assessment (HIA) will be prepared and will be submitted with the planning application for the stabilisation works. An earlier iteration of the Hydrogeological Impact Assessment for the planning applications was provided.

Impacts of the stabilisation works identified include diversion of the overland surface water flow route currently running across the site with excess flows discharging off-site, and a reduction in the permeability of the ground, which will result in a reduction of rainfall infiltration.

The potential for contamination of a public water supply is a perceived risk. Thames Water propose the scope of an EIA should include confirmation:

1. The developments demand for Sewage Treatment and network infrastructure both on and off site and can it be met.
2. The surface water drainage requirements and flood risk of the development both on and off site and can it be met.
3. The developments demand for water supply and network infrastructure both on and off site and can it be met.
4. Build - out/ phasing details to ensure infrastructure can be delivered ahead of occupation.
5. Any piling methodology and will it adversely affect neighbouring utility services

The submitted information states that effects on groundwater and the public water supply will be addressed through the HIA. The effects of reduction of infiltration on the public water supply are demonstrated to be low owing to the small quantum of water involved. Thames Water indicates any grouting below the water table is not acceptable and any grout mixture shall be free from hazardous substances.

The information submitted around risk to water supply states this can be avoided through appropriate use of materials and methods. Similarly, effects on surface water flows and flooding will be addressed through the FRA (which includes climate change considerations).

LLFA confirmed changes to soils beneath will have an impact on greenfield runoff from the site and with the SFRE consider this should be considered in more detail and could affect flood risk elsewhere. Further previously proposed soakaways, will no longer be feasible once the area is stabilised.

However, while mitigation to be developed through the planning process cannot be considered to obviate the need for EIA, a variety of mitigation is proposed for addressing the surface water effects. This comprises the construction of temporary berms which will direct surface water run-off to an appropriate location on the site for storage and release at a rate, to mimic the pre-development natural condition.

The EA did not respond as requested to the LPA on the need for EIA. Nevertheless, the Secretary of State consulted EA who indicated the sensitivity with regards to SPZ1. In terms of the potential to affect above and below ground water in terms of surface water infiltration

/ run-off and groundwater flow; as well as the potential for effects on public water supply, these matters are of concern to EA. In particular, in relation to any surface water discharge options for the site/this scheme, which are not yet known. EA would have reservations if any infiltration soakaways were proposed at this location. EA considers that an HIA is essential and will review this alongside the application

Based on the available information and having considered the views of EA, significant effects on the water environment consequently cannot be ruled out. While the project indicates the likely mitigation to be employed, there is insufficient detail or certainty as to the effectiveness of any measure employed. Therefore a detailed mitigation strategy and suitable monitoring arrangements are best agreed in advance.

The Secretary of State has also considered the stabilisation works are not unusual or untested activity associated with development. However, in arriving at a Direction the Secretary of State is obliged to take into account the ***Schedule 3, 1. Characteristics of the development with regards to the risks to human health including water contamination (c) the 2. (1) Location of development with regard to the relative abundance, availability, quality and regenerative capacity of natural resources in the area and its underground (b).*** Therefore, she considers that the likely measures around protecting the water supply are insufficiently and in particular the detail of the mitigation to be insufficient to satisfy the requirements of PPG. She further considers the impact of the project on this natural resource is limited for this development, given the particular water supply vulnerabilities at this location. Therefore, based on the available information she considers there to be likely significant effects with regards to the water environment from this development and this should be further considered through the process of EIA in order to consider the possibility of effectively reducing the impact as per ***Schedule 3, 3 Type and characteristics of the potential impact, (h) the possibility of effectively reducing the impact.***

Conclusion

The foregoing consideration of the potential impacts from the proposed works on the water environment in respect of the issues considered above is sufficient to indicate to the Secretary of State that the development proposed is likely to have significant effects on the environment. This is due largely to the uncertainty over those effects arising from the proposal and the need to tailor an effective mitigation strategy and its monitoring. The practice employed in carrying out the works and mitigation apparent from the request cannot be relied upon in this case and therefore a full assessment of the potential effects, their significance and the appropriate mitigation measures is required.

The Secretary of State's conclusion is based largely in considering the single issue of impact on water environment, with a particular focus on the water supply. Based on the available information and implications of the proposal and likely mitigation, the Secretary of State considers there is uncertainty, to the extent it is not possible for him to reasonably conclude that there is no likelihood of significant effects in relation to water resource for this project. EIA is therefore required and should be suitably scoped around this issue.

This direction does not affect any duties of the requestor under other legislation, including The Conservation of Habitats and Species Regulations 2017.

Is an Environmental Statement required?

Yes

Name	Mike Hale
Date	25 October 2025