

Representations and Objection to SODC regarding [P24/S2651/DIS](#)

Description

Discharge of conditions 4(vehicular access, footways, cycle ways, driveways and turning areas), 5(construction management plan), 8(landscape management plan), 9(method statement) and 11(drainage strategy) on application P16/S0970/O.(Outline Planning Application for up to 95 dwellings and associated public open space and landscaping. Means of access and strategic landscaping not reserved).

These representations to P24/S2651/DIS ('the Application') are made by the Thames Farm Action Group on behalf of each of the 4 members of the Steering Group, who are all residents of Lower Shiplake; also on behalf of the residents of Lower Shiplake whom the Action Group was formed to represent, and the 1500 local residents who signed the petition objecting to this development and its likely environmental impacts.

We are submitting these representations under the time pressure and deadline imposed by SODC for those representations to be made by 20 September 2024, notwithstanding our stated legal position, where we have confirmed to SODC that we consider this application to be ultra vires and premature, since it cannot properly be considered until after application [P24/S2642/FUL](#) ('the FUL application') has been considered and determined.

The reason for this is that the DIS Application can only be made and properly considered, pursuant to the FUL application, as it primarily relates to how surface water drainage might be managed both during the construction phases of the development and then as part of the long-term management of surface water following completion of the scheme.

There is no settled and approved scheme for the groundworks, and it is those very groundworks that are the overriding reason and responsible for, driving the applicant to this particular solution and design for coping with the surface water run off generated by the developed site.

Our engineers (JBA Consulting, who are specialist hydrogeological experts and whom were also used by the Local Authority in preparing its own Flood Strategy), are of the opinion that the overall scheme for the groundworks and drainage strategy and design will require substantial modification and reappraisal. The resultant changes would directly impact upon the drainage strategy and design proposed in this Application..

The Application is erroneously stated as being in discharge of P16/S0970/O, whereas it seeks to discharge a notional alternative development that could only be permitted under the FUL application and P24/S2652/S73.

It further follows that the third current Planning Application [P24/S2652/S73](#) (also pending determination), which seeks approval for the revised layout of the site pursuant to the approval of the FUL application, needs also to be considered and determined after any approval of the FUL application; should SODC be minded to approve that application.

We also note that the bundle of documents submitted with these applications has a number of sections missing i.e. Drainage Statement v15 Part 1, where there is a missing section 1.10 to 4.11. As a result it has not been possible to fully review this application yet

Without prejudice to the above statements, we are submitting these comments now, and will also submit the completed report / technical note prepared by JBA Consulting on the issue of inter alia the drainage proposals that the Applicant has put forward, confirming a number of errors and shortcomings. The latter has yet to be finalised and will be submitted in response to the FUL and S73 Applications.

It is apparent that there remains a major question mark over the design parameters that have been adopted by the Applicant in this submission, as it is clear that the location of the proposed 'balancing lake' is sited on top of land that contains dissolution features beneath it.

Without prior 'treatment' of those areas via ground remediation, the area of land surcharged by the structure of the proposed balancing lake, and filled with surface water from the entire site and perhaps part of the Highway, will cause collapses to occur below ground. It will also create a pathway for the potential contamination of the underlying groundwater, which forms part of the aquifer that, in turn, provides drinking water to perhaps 50,000 local residents in the area. (Extent of Catchment area for the Thames Water Henley Region taken from Thames waters website).

Should that ground be grouted/treated in the same way as much of the proposal to treat the rest of the site's developed areas, the balancing lake will be incapable of operating as a source of infiltration for the stored water. The lake design will need to consider any additional capacity then needed for the storage of water arising from the reduced ability for infiltration to take place.

The drainage solution proposed here, is also considered to be contrary to the NPPF, the SODC Local Plan (Policy DES8) and OCC 'Local Standards and Guidance' for surface water drainage. The NPPF, for instance, states:-

"The planning system should support the transition to a low carbon future..."

The applicants August 2024 Flood Risk Appraisal and Drainage Study remains some way from adequately demonstrating that the drainage strategy is appropriate, in line with planning policies and design good practice, and that it will not increase flood risk. Particular attention is drawn to the following points:

- The reliance on pumping to a high-level infiltration basin on the west side of the site makes this a carbon-intensive design. If adopted, the high operating costs would be passed on to water company bill payers or council tax payers.
- A number of design issues are highlighted by the drainage model, including velocities below the self-cleansing velocity for pipes, 28 Hydrobrake controls below the recommended minimum orifice diameter, and steep (1 in 4) slopes on the basins.

- The assessment of offsite flows does not take into account the whole of the contributing area draining into the site.
- Exceedance scenarios have not been considered for blockages and for a failure of the upper basin to infiltrate at the stated rate.
- The infiltration rate applied needs to be reassessed if compaction and/or grouting works are planned within the basin's footprint.
- Conversely, it is not clear whether the deep-seated voids identified in the area of the upper basin will be stabilised, and whether the risk of collapse beneath the basin due to high ground loading and scour of voids has been adequately considered.

We are also awaiting professional reports dealing with the issues of noise, vibration and air quality that will arise as a result of the proposals, taken both separately, and together, and would refer SODC to the very limited treatment of these issues in the various EIA submissions made by the Applicant.

Notwithstanding the receipt of further technical reports from professional advisors, it is felt advisable having regard to the nature and scale of the proposed developments (both in terms of groundworks and the subsequent years of construction work on site due to the phased construction of the housing development), that the Developer /Applicant should **require** the main contractor(s) utilised, in all phases of works to submit an application(s) to the Council for **Section 61 Consent** under the **Control of Pollution Act 1974**.

A condition is also considered prudent to cover the potential for noise impacts from the proposed pumping station(s) and the relocated substation for their normal operations post construction.

Conclusion

The Application works, if permitted, would cause immeasurable harm to the local environment, and will create a major risk to the flow of the aquifer underlying the site as well as the potential to contaminate the drinking water that supplies up to 50,000 local residents, for which, there is no piped backup in existence.

Accordingly, we urge SODC to reject this application.

Thames Farm Action Group

19 September 2024