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From: planning@cherwell-dc.gov.uk <planning@cherwell-dc.gov.uk>

Sent: Sunday, September 29, 2019 9:11 PM

To: Planning <Planning@Cherwell-DC.gov.uk>

Subject: New comments for application 19/01705/OUT

New comments have been received for application 19/01705/OUT at site address: Land Adjoining And West Of Bloxham Recreation Ground South Newington Road Bloxham

from David C Phennah

Address:

4 Hyde Grove, Bloxham, Banbury, OX15 4HZ

Comment type:

Objection

Comments:

The drainage plans involve using Hyde Grove piping to channel water away, but it's not clear that the effect of the increased volume has been analysed properly. The report refers to historical records of flooding but that of course is without 95 more dwellings draining into the same pipework and brook. The past incidence of sewer and groundwater flooding is not a good indicator of the future risk after doubling the number of dwellings using the system. In any case, such calculations would be affected by the number of bedrooms in total and that isn't specified in Gladman's paperwork.

The report on Foul Drainage states that the plans should cope with waste from half the dwellings, but 20 months of further work is needed to address the remainder. They see no reason to hold up the development in the meantime, but this seems inadvisable without any guarantee of a solution. The connection to the sewers is at the bottom of Hyde Grove, but you can already see that the road surface is bulging underneath the manhole cover. This would seem to indicate that the system is already stressed to the limit without twice as many properties using it.

Thames Water piloted SuDS between 2010 and 2015 and now intend to install further systems in London in the Summer of 2019. These involve permeable paving and road surfaces, allowing water to flow into subterranean storage structures that then control the flow rate into the sewer system. The use of SuDS is apparently quite recent so Gladman needs to do a thorough analysis to meet the requirements of 95 extra dwellings and an area next to one that is often waterlogged. The document that discusses SuDS and drainage solutions lists the options but doesn't establish the eventual combination that will meet all requirements. This seems to be because the calculations haven't been carried out yet.

The site plan shows the SuDS as though it is a sort of 'pond' in one corner of the site, but as Thames Water explains, a SuDS is a system of permeable surfaces feeding into underground structures. It doesn't seem possible for that system to be applied to Gladman's site when the roads and pavements are so far from the area labelled 'SuDS'. Is Thames Water fully aware of the proposed SuDS plan?

The recreation field has a drainage system that feeds into pipes that run under Hyde Grove and they connect with pipework under Brookside Way. The road surface surrounding the manhole covers is

already bulging in this area and the recreation field is often water-logged in the centre, so the present arrangement is already overloaded.

Thames Water spent 5 years designing and evaluating pilot SuDS and only now in Summer 2019 are they installing them as permanent features in 8 roads in London. A separate company, Barhale Ltd., is undertaking their construction and as it is a novel solution, their expertise is unlikely to be widespread.

Existing good practice guidance requires there to be a SuDS Management Plan to support any SuDS scheme. Typical headings cover the following:

- Litter management;
- Wetland maintenance: vegetation;
- Wetland & pond maintenance: silt;
- Ornamental planting;
- Native planting;
- Hard surfaces;
- Inlets, outlets, & gratings;
- Inspection & control chambers;
- Silt traps;
- Low flow channels.

Furthermore, once surface water runoff has been cleaned using the SUDS, then, as confirmed in Building Regulations 2000: approved document H: Drainage and waste disposal, water will either flow to natural drainage or discharge to the sewer in the following sequence of preference:

- An adequate soakaway or some other adequate infiltration system; or, where that is not reasonably practicable.
- A watercourse; or where that is not reasonably practicable.
- A surface water sewer.

There is no acknowledgement of these complexities in the Gladman booklet, let alone any information.

According to Cherwell DC "Level 1 Strategic Flood Risk Assessment Update (May 2017)", site SFRA206 (the one Gladman is proposing to develop) requires:

"a (sic) FRA which must assess risk from rivers, surface water, sewer, and groundwater flooding. Sites within or adjacent to indicative floodplains will require detailed assessment of the extent of the floodplain as part of a site-specific FRA. Thames Water's DG5 dataset identifies that the site is located within a postcode area reported to have had 14 incidents of historical sewer flooding in the last 10 years."

The majority of potential sites CDC has identified do not require an assessment of risk from all four sources of flooding as this one does, and Gladman's proposal does little to acknowledge this, let alone address it with specific building solutions. In addition, the point about adjacent sites is particularly important here because they aren't all floodplains. Instead an existing housing development is juxtaposed to site SFRA206, and this has already been used to accommodate floodwater from recent new developments, so capacity has to be a prime consideration. The intended SuDS is located right next to this boundary. However, the document does not specify whether the SuDS is a detention basin, an infiltration basin, a retention pond, a soakaway, or a sump. The choice will depend on the volume of water involved and its ultimate destination.

Case Officer:
Samantha Taylor

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