

BEGBROKE PARISH COUNCIL

Planning Application 21/03522/OUT

- Begbroke parish council **object** to this application.
- The parish council are not convinced that any notice will be taken of objections. Several thousand people objected to the removal of green belt and were ignored by CDC giving a green light for this application to proceed.
- The government is against building in the Green Belt. This was a manifesto commitment.
- We believe this application is about the demands of Oxford University, Begbroke Science Park and in the case of PR9 - Merton College. It is about a fictitious unmet housing need in Oxford. There are many brownfield and other sites that could be used.
- The sheer number of documents submitted and paid for by the applicant and their consultants do not give confidence on the impartiality of their findings and conclusions.
- It is impossible to properly assimilate the number of documents submitted – we are not planners or experts in the many fields presented.
- We think it will also be difficult for CDC Planning Committee to also evaluate the scheme.
- The parish council have read comments from other objectors and fully support their views for example (Emma, Rowel House, 7 Woodstock Road East, Begbroke, Kidlington, OX5 1RL; Mark Rowan-Hull, Foresters Lodge, Spring Hill Road, Begbroke, Kidlington, OX5 1RX; 8 Stocks Tree Close, Yarnton, Kidlington, OX5 1LU; Mrs. E. and C McDonnell 153 Rutten Lane, Yarnton, Kidlington, OX5 1LT; Richard Saunders 161 Rutten Lane, Yarnton, Kidlington, OX5 1LT; **Yarnton Flood Defence documents – less images – appended.**
- This planning application appears to have buildings up to four storeys. Apart from the probable **overbearing appearance** of such properties and their inability to blend into the landscape, we are concerned that they may exceed CDC Policy C28 of the adopted Cherwell Local Plan and Government guidance contained within the National Planning Policy Framework – see below:
- Begbroke Science Park. OUTLINE PERMISSION FOR DEVELOPMENT SUBJECT TO CONDITIONS. Date of Decision: 30th April 2014 Head of Public Protection & Development Management. **Application No: 01/00662/OUT SCHEDULE OF CONDITIONS 5** That the proposed development shall be constructed **as single or two-storey buildings only**. Reason - To ensure that the proposed development is in scale and harmony with its neighbours and surroundings and to **comply with Policy C28 of the adopted Cherwell Local Plan and Government guidance contained within the National Planning Policy Framework.**
- These plans, whilst mainly in Yarnton, offer little to Begbroke. It is difficult to see how the possibility of perhaps a thousand more residents could improve the village.
- These buildings will cause virtual coalescence with Yarnton.

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- **A Pedestrian crossing** for Begbroke village is not included in the plans This is a major priority for this village and there is much correspondence on this recorded with Oxfordshire County Council. There must be a commitment for section 106 monies from the developers. The current lack of a controlled crossing is also discriminatory to the old, the young and anyone who is mobility impaired. This needs to be addressed in advance of any construction works. A similar problem exists for Vehicles trying to exit service roads and Spring Hill due to traffic volumes and speed.
- Allowing traffic on to the A44 at the science park junction will further increase queuing and reduce the gaps in traffic through Begbroke making it even more difficult to cross - the current traffic light sensors are also defective.
- The speed awareness signs work overtime - another reason a crossing is required.
- Water infrastructure is inadequate for this development and substantiated by Thames Water response who may object
- Oxford Clinical Commissioning Group have objected saying: Insufficient Consulting rooms to cope with increased population growth as a direct result of the increase in dwellings. The addition of the Extra Care housing will put a significant pressure on the local practices, and we will have to determine if any have the capacity to take on this additional workload. This PCN area is already under pressure from future additional patients due to nearby planning applications, and this application will directly impact on the ability of The Key Medical Practice in particular, to provide primary care services to the increasing population. OCCG is in discussion with practices, the Council, landowners / developers, or agents, to consider how the Kidlington area can support health to the 4,400 dwellings.
- Lighting throughout the development should meet the general standards of BS5489-1:2020. Lighting plans should be provided which should set out how this standard will be achieved not only on adopted highways, but also un-adopted roads and parking courts.
- We object to proposals to close Sandy Lane. Shopping and many other types of journeys will require a car either via Langford Lane or Loop Farm if Sandy Lane is closed. People without transport will be stuck especially with one mini-bus trip/week. Retention and integration of Yarnton Medical Practice into the development is noted. Many people travel from Kidlington to the surgery, care home and nursery/retail Centre. This must be addressed.
- No retail provision meaning that all residents must go to a larger settlement such as Kidlington for shopping. The nearest small facility to Begbroke is Budgens Yarnton.
- Transport Links - no direct bus link from Begbroke to Oxford Parkway or Water Eaton P&R which has buses to hospitals. Impractical bus changes, in either Oxford or Woodstock necessary.
- There is bound to be Increased air pollution - is regular monitoring to take place?
- Oxford City Council prime reason for building on the greenbelt was that their unmet need for houses. Now thousands of houses are planned to be built around Oxford There is no reason to build on our bit of the greenbelt north of Oxford. The Data provided by Oxford city

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council does not match the reality of misleading data on infrastructure that is available example flooding, transport, Sewerage and Computer modelling on car movements.

- They have had meetings regarding flooding with experts from Europe attending. The minutes of these meetings should be available for examination.
- Long-term management plans and effective, sensitive management (with regular reviews) will be needed for all sites - they all have green infrastructure and wildlife habitat. To ensure management lasts for as long as the built environment is built up (e.g., likely to be forever) then an endowment fund may be needed to ensure that management costs can be covered. Ideally, there would be a funded officer-role to coordinate and oversee this. This could be alongside or sharing a role as a community engagement officer. This role could for example be delivered by an officer in an external organisation with appropriate experience.
- According to their website “Merton College has a rich 757-year history of responsible stewardship of historic buildings, farmlands and the environment. This is in addition to our excellence in academic teaching and research. I am proud to be the Warden of a college community so committed to improving biodiversity and creating a sustainable future” *(from their website and hardly fits with destruction of green belt and local environment)*

Illustration set 1 – Hedge and tree damage at PR9 site



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- Ideas about Dolton Lane are upsetting. The nature of this lovely ancient rural lane is that sometimes it is impassable, but this is what makes it so special. It would be a disaster if it were turned into an urban pathway. The character of the lane would be lost forever. Turning the whole Binfield into woodland rather than just part of it is not a preferred option. It is a special field for wildlife.
- There is a wide range of wildlife species that inhabit the PR9 and Binfield. Owls fly over, swifts who are becoming endangered, hares, rabbits (also in decline) crickets, spiders on whose gossamer threads the swifts feed on, deer and insects.

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- Begbroke Parish Council could be involved in the stewardship of the woodland and nature areas that have been proposed for PR8 and PR9.

Dolton Lane after tree and hedge work.



- Cherwell Landscape said: The Parameter Green Infrastructure Plan must clarify that the hedgerows and trees within the productive areas are to remain and be protected. *The above images show what has happened in the past.*
- How can the development of agricultural land be considered to 'provide significant ecological and biodiversity gains'? Development and increased population bring disturbance to wildlife including the presence of cat's dogs and rats.

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- ***Footpath FP 124/9/10 is incorrectly shown on all diagrams in the documents.*** The definitive map shows it directly opposite Hall Farm, The Position where the incorrectly placed finger post and gate is opposite hall Fam Paddocks and is a permissive route only. A meeting earlier this year with Merton agreed this point.
- Ridge and Furrow fields are of significance from historical medieval Farming – especially in how they control surface water (Binfield)
- The sewage and Drainage will present problems and will impact of flooding in Yarnton and Begbroke
- CDC confirm the greenfield rate here is known to already cause downstream flooding in Yarnton. Therefore, it is desirable and important that the discharge is limited to less than the greenfield rate.
- Conclusion by WSP say: The principles of the proposed surface water drainage strategy including the use of 'cut-off' ditches and basins ensure the site may be developed safely and the post-development surface water flood risk may be considered low. The flooding Yarnton in 2021 and the images submitted by 161 Rutten Lane and Yarnton Flood Watch do not support this view. This clay soil is not free draining. [Soilscapes soil types viewer - National Soil Resources Institute. Cranfield University \(landis.org.uk\)](https://landis.org.uk/soilscapes-soil-types-viewer)
- Most of PR9 is slowly permeable seasonally wet slightly acid but base-rich loamy and clayey soils, seasonally wet pastures and woodlands and impeded drainage. Main risks are associated with overland flow from compacted or poached fields. Organic slurry, dirty water, fertiliser, pathogens, and fine sediment can all move in suspension or solution with overland flow or drain water. Mostly suited to grass production for dairying or beef, some cereal production often for feed. Timeliness of stocking and fieldwork is important, and wet ground conditions should be avoided at the beginning and end of the growing season to avoid damage to soil structure. Land is tile drained and periodic moling or subsoiling will assist drainage. Nearer Rutten Lane is Freely draining.
- *We fear that this development will impact Begbroke East as well as Yarnton.* Begbroke east experiences flooding both now and historically and there will be thousands of houses built because of PR8. They mitigate this by saying balancing ponds will be constructed with slow release.
- The city council has put on two conferences to discuss flooding around Oxford they then go-ahead spending Millions of pounds of taxpayer's money with Flood prevention to then be worse off by building thousands of houses north of the Abingdon Gap where there is a maximum amount of water flow that you can get through this gap at any one time. It is no good ignoring the advice given by the international participants. Flooding is not going to go away. You can sit in a traffic queue for hours on end and it will not really affect anyone whereas water movements will, and the councils are negligent in looking after their residents which is a statutory requirement.
- Oxford City Council should be compelled to pay for an independent hydrologist report on this area before a single house has been built.

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The series of images below shows water flow from east of Hall Farm Spring Hill down to St Michaels Lane, flooding the Old Rectory, high water by Orchard House, a flooded burial ground at the church and continuing to the A44.



Blocked and hidden drains



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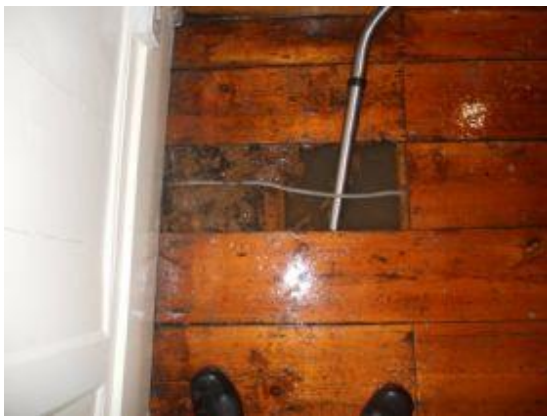


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Flooded property



Dolton Lane

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Alongside FP 10



Begbroke West near FP 10

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PR9 fields



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PR9 from A44 Cycle path with water on ground



Begbroke East

Rowel very near house boundary.

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Site of proposed school



Footpath 7 Near pumping station

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Views of flooding adjacent to Rowel Brook and pumping station

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Begbroke Science Park – from Begbroke Lane near Roundham



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Outflow of Rowel Brook to Oxford Canal



Flooding in 1975 – Fernhill Road

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Dec 2021 archeological survey trenches

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Appendix 1

Planning Committee
Cherwell District Council
Bodicote House
Bodicote
Banbury
Oxon
OX15 4AA

Ref: Planning Objection - 21/03522/OUT

Date: 22nd November 2021

Dear Planning Committee,

We are writing to make a strong formal objection to the planning application 21/03522/OUT - Land West of Yarnton based primarily on the failure to address increased risk of flooding to the existing community.

As recently as January 2021 our village has been severely affected by surface water and foul water flooding with properties inundated with water ruining homes and gardens, causing anxiety across our community every time a significant period of rainfall approaches. Whilst we are

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working to address the insufficiencies in the existing drainage system with various agencies who have a responsibility for drainage, there is a genuine fear that if the development of PR9 proceeds without full integration and assessment of current flood-related issues in Yarnton the overall impact from flooding will increase to a level that is entirely unknown.

Our objection is based on the following:

1. There is no acknowledgement or consideration of the combined flood risk at the development site and the existing village – there is a large omission in the flood assessment maps of the known River Thames Flood plain (see comparison maps below).
 2. There is limited documentation demonstrating an understanding of historic drainage channels and local topography. The proposed development will lead to a heightened flood risk for the Yarnton community due to a squeezing of available drainage capacity between the PR9 development site (the source) and the Thames flood plain, (the sink) on which the village of Yarnton borders highlighted by point 1 above.
 3. No measures have been detailed for the displacement of ground water within the development site either during construction or upon completion.
 4. No information or assessment of grey water systems within development site and their impact on existing foul sewage networks has been included in the PR9 plans.
 5. No information is in the PR9 plans about proposed foul sewage pumping main routes or outfall points in the existing village of Yarnton.
 6. There is concern in regard possible exceedance flow routes and flow depths from the development site through the existing village of Yarnton which does not have sufficient capacity in its drainage, as has been proven in recent flooding events.
 7. There is a lack of clarity in regards the management and maintenance responsibility for the drainage scheme post development ensuring liability is clearly defined from outset.
- Empirical evidence and in-depth community knowledge to support our objection can be provided to applicable planning officers upon request. Please refer to our prior detailed letter to the Development Briefs Project Team dated 08.09.2021 ref: Local Plan Partial Review Draft Development Briefs for PR9 (Land West of Yarnton) which is also included in this objection for reference.

We have serious concerns that if these factors are not fully considered and addressed through the planning process the community in Yarnton will suffer from increased flooding risk both in severity and frequency. Should this indeed be realised we would in the first instance pursue a remedy via the local flood authorities. If unsuccessful we would encourage private individuals to seek recompense for future damages from the stakeholders concerned.

Our objection is fully supported by Yarnton Parish Council.

We look forward to receiving your response.

Kind regards,

David Thornhill, Colin Rhodes and Steve Smith
Yarnton Flood Defence

Development Briefs Project Team
Planning Policy, Conservation and Design
Cherwell District Council
Bodicote House
Bodicote

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Banbury

OX15 4AA

Ref: Local Plan Partial Review Draft Development Briefs for PR9 (Land West of Yarnton)

Date: 08.09.2021

Dear whom it may concern,

Thank you for the opportunity to comment on the development briefs recently released for public response with particular focus on the development PR9 – Land West of Yarnton. On behalf of the village residents, we have concerns regarding several points outlined below and believe these should be taken into careful consideration within the planning of the proposed development.

Our primary concerns are:

1. No acknowledgement or consideration of the combined flood risk from groundwater and flash flooding at the development site or existing village both of which have been shown to be at real risk and not just hypothetical with recent evidence to showcase this
2. No acknowledgement or consideration to address existing flood risk from foul sewage, again, which has occurred recently and historically
3. Limited understanding of historic drainage channels and local topography with disconnected development leading to a heightened flood risk for the whole community
4. Inadequate drainage assets both historical and part of development sites which have not considered the wider community context and been neglected for many years

What we are seeking is a well-planned and empirically evidenced proposal from the developers that addresses the existing flooding risk to the wider village of Yarnton and not just the site of development with an adequate surface water and drainage strategy in place. The overall risk of flooding should not be increased either during development or post development. Given the known flooding risk to the village, both of which ODC and CDC are fully aware of, we believe an in-depth flood survey across the full village should be undertaken as part of the project and a condition placed

on the development to achieve it so that the risk of flooding is mitigated against through design and maintenance. We believe that the local flood authority has a duty to protect our community and may

even consider extending the flood assessment and management to PR8 due to its close proximity and likely connected influence.

We would very much welcome the opportunity to engage with you and the planning team on these matters and look forward to receiving your response.

We have extensive evidence of the flooding that occurs in our community and have spent time mapping all water courses within the village to identify the issues and possible solutions all of which we can make available should they be beneficial to the development brief. Below is further evidence and information to support our response.

Local context:

Yarnton is a historic village with human settlement dating back 3000 years with a permanent settlement being recorded here in the Domesday book. Over time the village has grown from five farms at or near the junction of Cassington Road, Rutten Lane, and Church Lane to the village it is today with hundreds of properties with thousands of residents.

Flooding in the village is not new and has been occurring over many years. The Environment Agency has issued flood alerts and warnings for large areas to the south of the village on many occasions which often coincide with perfect flooding conditions, a high water table and heavy surface water

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run off, events we have experienced far too frequently.

The hap-hazard expansion of the village without careful consideration of local topography and drainage has without doubt contributed to the increased risk of flooding to the whole community with the historic core at greatest risk. We fear that further development will exacerbate this issue, increasing the frequency of large flooding events without careful planning and consideration.

Proposed development site:

The proposed PR9 development site is located on the eastern slope of Spring Hill and falls sharply towards the A44. The top of the hill comprises an ancient river gravel terrace which overlays the Oxford Clay band. The terrace gravel is known to store groundwater and there is a spring-line on the slope at the junction with the clay band, hence the name Spring Hill. To the east of the Oxford Clay is the River Cherwell/Thames alluvial drift deposits mostly consisting of sandy clays which is relatively permeable in comparison to the heavy clay. The topography and geology of the area would suggest the ancient surface water and groundwater regime was for the terrace gravel to discharge at the spring-line onto the surface of the clay band and flow across land to meet the alluvial drift deposits and from there into open channels feeding into the Thames.

We suspect that Rutten Lane was at first an un-metalled track connection to Begbroke, its route being along the bottom of the Spring Hill slope. The track bed lays mostly on the impermeable Oxford Clay leading to it becoming rutted and virtually unpassable in winter. The metalling of Rutten Lane enabled the village to expand northwards first by speculative frontage development on both sides of the road and later by infill development.

The impact of this has been to disrupt the original flow pattern off of Spring Hill, training it towards a constantly reducing number of open gaps in the now continuous dwelling frontage. There is still an open ditch in parts on the west side of Rutten Lane which we think was originally intended to cut off the flow from Spring Hill keeping the road dry and channel the water to crossing points under the lane. With the now continuous dense frontage development the ditch has largely been made redundant with perhaps the exception of being used as an open soak-away for the school roofs and hard paving which is particularly noticeable.

It is not entirely clear how the drainage of the village between Rutten Lane and the A44 is now supposed to work. We have been reliably informed that there are no public surface water sewers in the village and it is entirely drained by a patchwork of highway drains and riparian ditches. Many of these seem to have been abandoned or backfilled resulting in their continuity having not been maintained. There seems to have been a disjointed and only rudimentary consideration of how a combination of flash flows and groundwater runoff will reach the River Thames through this system which has further exacerbated the problem faced in the village of seasonal flooding.

Having extended north over the past 50 years the village has gradually cut off the natural combination of groundwater and surface water flows from the higher ground overlooking the village.

The proposed PR9 development will continue this trend extending the village yet further north and more or less fill the remaining drainage corridor between Spring Hill, the Cherwell and Thames flood plains.

One of the most recent extensions north along Rutten Lane has been the construction of the Yarnton

Medical Practice. The site does include a SUDS attenuation pond, which was quickly overwhelmed by the Christmas 2020 surface water flash flows off the fields onto which the PR9 development adjoins,

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with the excess water freely flowing through the nearby streets to the dual carriageway.

The two principle flash flood routes now seem to be; the Cassington Road and Church Lane to the south and the north section of Rutten Lane into Aysgarth Road, effectively the north and south extremities of the current village.

It has also put new areas at risk including the most recent large development off of Cassington Road. Residents were assured that sufficient measures had been designed into the scheme to safeguard it from up to 1 in 100 year flood. What was observed was the attenuation ponds were already partially filled with groundwater from the Thames water-table in advance of the Christmas flash flood event. It is our understanding the ponds were at one point during the Christmas event perilously close to being overtopped.

Considering the close proximity of the River Thames water-table outline, we would like to know what

allowance was made for the possible presence of groundwater in the SUDS design? At the same time the Environment Agency had put the area on a red warning for groundwater flooding. The Agency's flood warning zone abuts the southern fringe of the village.

It seems this opens the possibility of a number of combinations of high groundwater levels in the Spring Hill gravel terrace. High intensity rainfall over the local catchment and a high water table in the

River Thames could all combine to bring the flood risk to areas of the village well short of the 1 in 100 year gold standard quoted in early consultation information.

It is our contention that the planning brief for PR9 should contain a requirement for a full investigation of how the existing village will be protected from flooding including the PR9 and also perhaps PR8 at a strategic level. This of course may highlight the need for additional "off-site" works that the planning and drainage authorities will need to decide how they would be funded. It is also our contention that the local drainage authority has a duty to protect from flash flooding the existing population as a consequence of the development, particularly considering its scale.

We can perhaps forgive previous generations of planners for lack of knowledge and foresight about the hydrological implications of the ribbon development that took place in the village and perhaps hampered by lack of statutory powers to appropriately control it. Now, through the emergence of the

unintended consequences of their past decisions we have seen first-hand, ignorance will be no defence.

Sewage Management:

Your draft document references pumping mains crossing the development site. Is it serving Begbroke

and linking it to the now derelict Yarnton sewage works, or is it linked to discharges from the Cassington sewerage works? Cassington works seem much too large for Cassington alone. Can we therefore assume it also treats sewage from Eynsham?

We would also like to know if the treated effluent is then pumped east into the Cherwell catchment and discharges into an open watercourse presumably on the east side of the A44.

Another question is whether Thames Water is currently licensed to discharge untreated sewage from

Cassington sewage works (in storm conditions when capacity of the works is exceeded) into the natural environment and if so, then where does it outfall?

Carterton and Witney in the Windrush Valley have been allowed to expand at a pace with very little

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consideration of the risk of untreated sewage overflow due to insufficient sewage storage capacity in

the catchment. I'm sure you are aware of the ongoing campaign to stop the continuing pollution of the River Windrush. We are very keen to avoid the same situation with the River Cherwell. We have concerns about the public foul sewerage and its ability to cope with 540 additional homes. Our concern for Yarnton is that foul sewage flooding already occurs simultaneously with groundwater flooding and flash flooding. This resulted in village residents having to endure their gardens filling with untreated sewage on a regular basis when the water table rises.

Thames Water operatives who attended the most recent incident stated they were unable to offer practical assistance because of groundwater infiltrating and filling the foul sewerage, similarly overwhelming it as it does the surface water drainage system – foul drainage should be a self contained system, not subject to fluctuations in groundwater levels, however we do appreciate the circa +20% extra capacity Thames Water have to pump away excess surface water that enters their system.

Our fear is that the connection of 540 new homes (and eventually the addition of PR8) will make a repeat of this event far more likely and more extensive in years to come. There seems to be a similar picture developing across the country. We have already mentioned Witney – Oxford City also has a problem with the inundation of the foul sewerage when the River Thames is in flood, which Thames Water is unable to fully explain or offer a remedy to. A large part of the Public Health Legislation was aimed to ensure proper drainage and a healthy environment free of filth in urban areas. We can't lose sight of that in the current dash for growth.

SUDS and Surface Water Management:

Developers put great faith in the provision of SUDS that comply with national guidance. However, designing to a 1 in 100-year return does not in itself provide assurance for the next 100 years. That requires an appropriate level of maintenance over the same time period. The development will create new infrastructure that residents will rely upon to protect their homes for the next 100 years. Previous SUDS schemes the liability to maintain this capacity has not been made entirely clear (via a planning condition or covalent on the development) and we suspect many will look to the local District or Parish Councils as the responsible body of last resort.

As we have seen in recent flooding events there is minimal planned maintenance carried out on the existing drainage assets. Intervention has simply been to respond after the event when it is too late to be of practical help. There is no flood warning system in operation for flash flooding. A suitable method of guaranteeing, or ring-fenced funding must be put in place to ensure maintenance activities do regularly happen, not left at risk of economic austerity forced upon local councils. Maintenance of the physical environment (roads, drainage, public parks, and open spaces) is usually the prime target to budget cuts.

Our final point is that however sophisticated or robust the SUDS designs submitted by the developer might be, it will rely to some degree on assumptions about probable rainfall profiles, water-table levels and infiltration rates over weeks and months prior to a localised torrential downpour. We are sure the risks will be designed out as far as practicable, but we will inevitably be left with a residual risk.

We would like to know who will be liable for this risk and do they propose to secure an appropriate level of flood insurance cover for losses that the existing village and possibly the proposed development might suffer? If not; can you tell us with whom the residual risks will finally rest?

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We will look forward to hearing from you in response to the above.
Best regards,

December 2021