Oakley Green, Fifield & District Community Association Ltd
Environment Work Group
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ENV_17-00997-CONDIT_02

Victoria Gibson
RBWM Planning and Property Services
Town Hall
St Ives Road
Maidenhead
SL6 1RF

Fifield Farm Cottage
Oakley Green Road
Fifield, Berks, SL4 4QF

01628 784441

20 July 2017

Dear Ms Gibson,

Application number 17/00997/CONDIT for discharge of Condition 6 concerning drainage for planning permission 15/02107 for the relocation of the Phoenix Gym to land north of Longlea, Fifield Road, Fifield, Berks

Thank you for including OGAFCA in your meeting last Friday, allowing us to voice the serious concerns of the Community. I look forward to having sight of the draft minutes to make sure that it is clear that OGAFCA still has serious concerns.

I was asked towards the end of the meeting what I thought of the situation now. I replied that we had at least had the opportunity to ensure that the concerns of the Community might be considered, which up to that point they seemed not to have been, but it was probably unlikely that we could achieve anything more. Nevertheless I must try again as I'm sure you realised there were several things that were not satisfactorily resolved in our opinion.

1 - The on-site storage capacity of approx 485 m³ is only slightly over half of what earlier submissions by the Applicant specified as being the requirement of 880 m³. Our 3D modeling has not been challenged by the Applicant so this remains a cause for serious concern. It casts real doubt on the insistence by the Applicant that all runoff can be kept on site and that the SUDS scheme as proposed is appropriate.

2 - The assertion by the Applicant that "there is no groundwater or water table" is something that local knowledge and experience over many decades suggests cannot be true despite the submission of a Geotechnical Survey. There are many who refute this and even a witness to drilling activity on and near the site who have suggested otherwise and would testify to the presence of considerable quantities of water. The Geotechnical Survey was conducted during the month of April and we would not judge April to be in what could be termed the "wet season". In past years the expectation in a wet winter season was that the ditches would be full from end of October to beginning of March. The Applicant does however accept that surface water in that corner of the field is present throughout the wet season to an approximate depth of 1 or 2 inches. The Geotechnical Survey states :

"*The three remaining boreholes were located within the London Clay. Generally these standpipes recorded ...*

*... **rising water levels since first visit due to relativity wet weather during the monitoring period**.*

It is considered that the water levels recorded reflect the slow accumulation of water trapped within the monitoring well rather than true groundwater levels."

We have to assume a competent technical survey so the boreholes would have been capped and water was not dropping into an open well. So it must presumably have been gradually permeating into the well from the surrounding ground - exactly what will be happening to the permeable storage areas and pipes of the proposed scheme. Whether we call this "Groundwater" or "Water Table" or "Slow Accumulation

Over Time" seems entirely academic. The overall effect is the same and was raised early on in this process by both Simon Lavin and WSP. The associated table in the survey indicates water at 0.6 m down ... almost the 0.5 m we have used for our 3D model - and the survey was conducted in April ... hardly the height of the wet season !

3 - The whole issue of the depth of the ditch was the cause of some friction as I know you are well aware and we feel it was extremely dismissive of the Applicant's representatives to pour scorn on our illustration of the true circumstances on the ground. In our view this illustration remains entirely valid and I'm afraid we find the explanations that have been put forward for the dimension in question not credible at all. The MLM submission states on page 5 (page 8 of the PDF) :

"*This surcharged condition of the ditch has been modeled as a surcharged outfall, with a water depth of 1.45m from the base of the ditch identified as ...*

... the maximum possible water level, corresponding to the maximum height of the road above ditch invert."

I'm afraid that none of us can come up with an alternative interpretation of the wording but that the 1.45m refers to the height of the road above the base of the ditch. I'm afraid we find it very hard to believe that this is simply an error in the way the section diagram was drawn. So if this is an erroneous number used for modelling purposes then at the very least doubt must be cast on the veracity and relevance of the theoretical modelling. Despite the original meaning taken from the French "surcharger" meaning to ADD an additional tax it is difficult to accept as reasonable or as "a small amount" the addition of a massive 55% to the depth for the purposes of making sure the model "sees" the ditch as full to overflowing.
I'm sure you remember that I returned to this matter several times in an attempt to understand this properly but when I tried to pose a hypothetical situation as an illustration was told my question was not understood. This therefore remains an outstanding matter to be resolved and we feel is one of crucial importance to the credibility and viability of the proposed scheme.

4 - The MLM document continues :

"*The length of time the ditch remains full is currently unknown, but has been modeled as ...*

... 10080 minutes

... for the purposes of the on-site network design."

The length of time that the ditch might be full has been hypothesised by MLM as 7 days. I noted that there was some consternation about where this figure came from … and so there should be. Most local residents would tell you that in a wet season the ditch can be running full or nearly so for much longer than 7 days ! So the question needs to be asked … For how long can the rain fall and the ditch run full before the water on site becomes unmanageable ?

5 - There was much discussion about the potential problems posed by the design of the entrance crossing the ditch. Remsha from Project Centre also had concerns about this. It was suggested that what had been proposed was simply a temporary crossing to allow access to the site for construction purposes and that a finalised design would be proposed at a later stage. We feel that this sounds extremely unlikely. Why would any competent construction plan aim to create an entrance crossing twice ? It was suggested that this was a detail for a future stage in the process but it is in fact another crucial matter of relevance to the viability of the SUDS scheme and a decision needs to be based on current design proposals rather than hazy statements of intent.

We do realise that we have been allowed to contribute to this discussion beyond what might be generally expected during normal public consultation and it may be unlikely that we have any continuing opportunity to do so. But I'm afraid we still cannot see this proposed scheme as one that a Planning Authority acting reasonably could possibly approve. It is our view that the SUDS scheme as currently proposed has completely inadequate provision for on-site storage. This needs to be significantly increased to be sure of avoiding flooding both the site itself and the surrounding area.

So the expectations of our local Community that this matter will be properly scrutinised and a satisfactory conclusion reached must rest with Remsha and Project Centre … but ultimately with you … to be absolutely sure that whatever scheme is approved will really work properly in practice.

A heavy responsibility.

We thank you for listening to us.

Yours sincerely

Rod Lord
OGAFCA Environment

In addition to 3 x A3 pages of our 3D analysis (already available elsewhere) the following enclosures were used at the meeting and are included here for your information and in order to bring them into the Public Domain.

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Phoenix Gym - Condition 6 - SUDS

OGAFCA would like to thank Victoria Gibson for inviting us to this meeting and Project Centre for taking our concerns seriously which up to now appear not to have been addressed at all.

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1 - Greenfield run-off

Item 1 on the first page of our letter discusses this, as do 4 early items in the MLM submission. The summary on the last page actually claims we are all being done a huge favour !

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2 - inadequate on-site attenuation storage capacity

Previous submissions postulated post development need for storage capacity of 692 to 880 m³ to comply with 1 in 100 years + 30% run off test required by SUDs technical regulations.

Our 3D model suggests that total dry season capacity of the proposal is only 484.65 m³.

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3 - inadequate on-site attenuation storage capacity

During times of most need storage volume will be seriously compromised by water table being very near surface. This was raised by Simon Lavin and also noted by WSP Local and anecdotal and photo evidence supports wet season water table level of around -42 cm. 3D model indicates generous assumption of water table of -50 cm would remove at least 79.73 m³ of system capacity.

In wet season overall capacity of system therefore reduced to only 405.28 m³ - far short of 880 m³ called for in previous submissions.

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4 - outflow

To allow reasonable falls outflow will be at or close to bottom of ditch - under water with wet season water table level of -50 cm. Would not need much water in ditch to prevent or impede outflow.

When ditch is full (as it often is in wet season) entire system will be backed up ... what then ?

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5 - ditch dimensions

It is not easy for a lay person to understand the reason given for allocating an incorrect dimension to the ditch.

Could we please have an explanation of how this distortion serves any useful purpose ?

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6 - site survey

The site survey included in the MLM submission indicates clearly that the difference between road spot heights and ditch bed spot heights are generally around 1 m.

We submit an image as an illustration of our site survey.

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7 - site entrance

The ditch cross section diagram is emphatic that the outflow pipe will not protrude into the ditch so there is no possible obstruction of flow, thus avoiding need to obtain consent.

The same diagram suggests the use of 2 x cement pipes to form a bridge for the site entrance. This concrete obstruction across ditch makes encroachment of 6 inch pipe seem trivial by comparison. Surely this would form a very significant obstruction to the flow when the ditch is full ? ... or even 66% full ?

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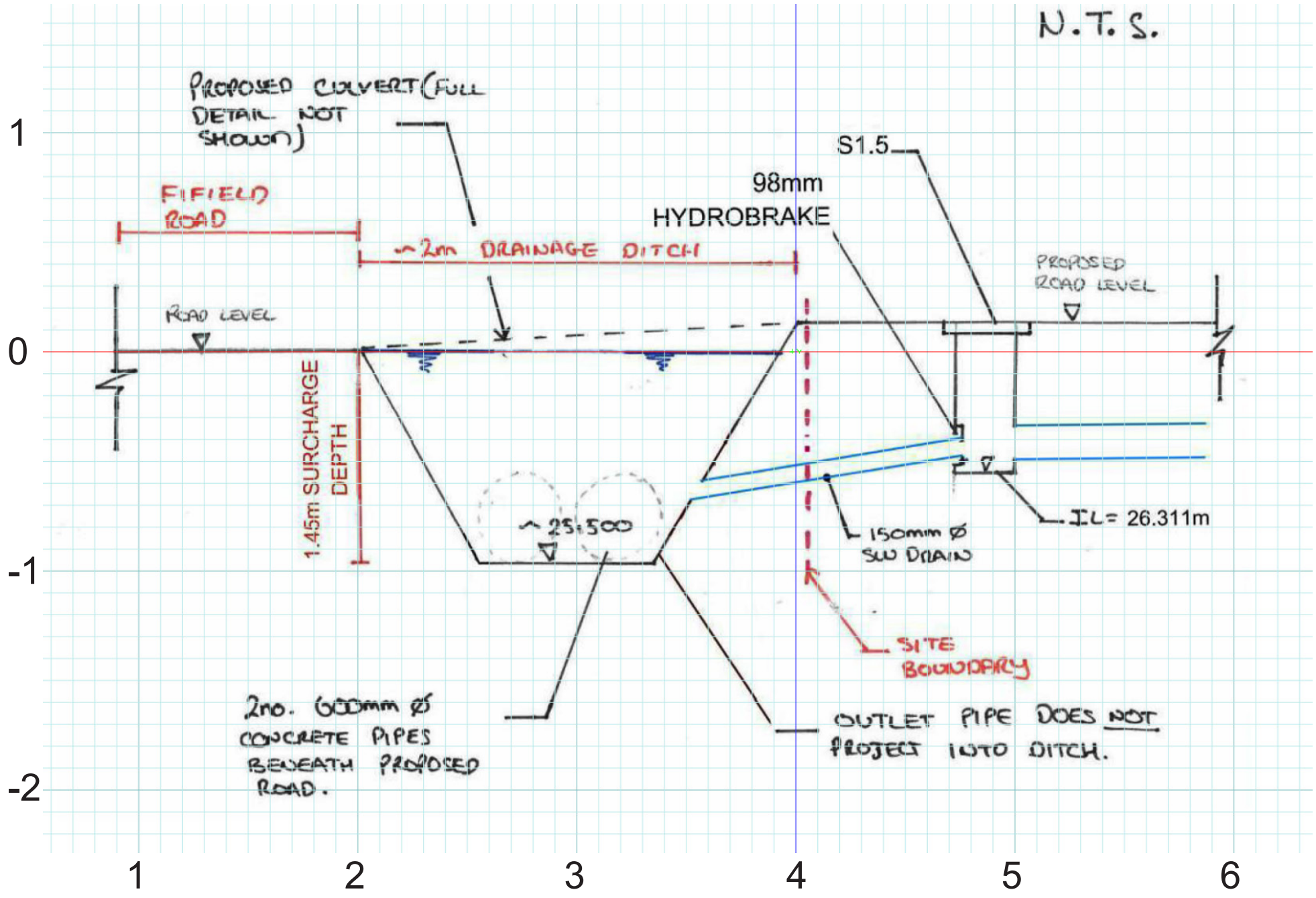
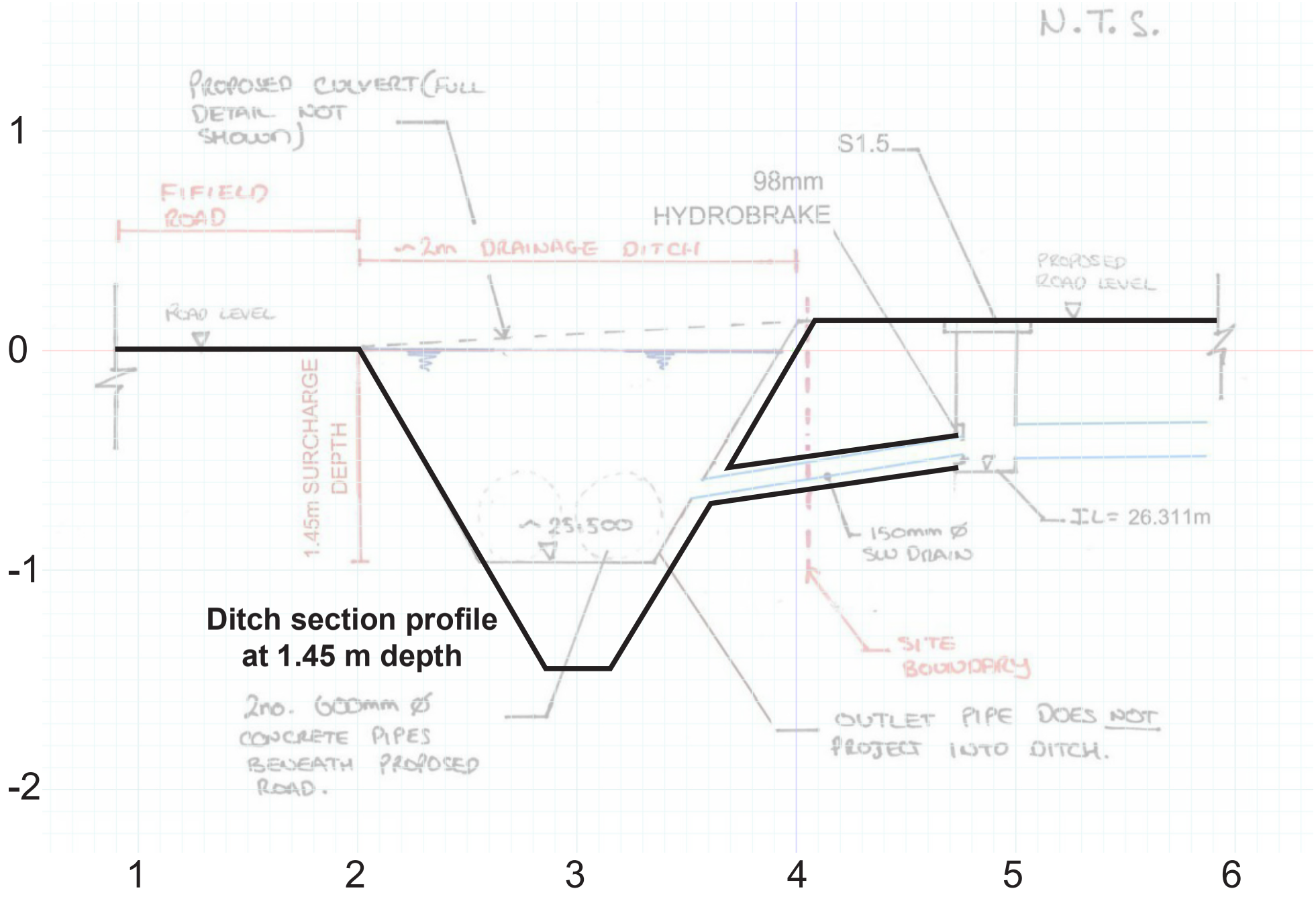
8 - viable scheme ?

This scheme cannot be deemed to discharge condition 6 until all these shortcomings are properly addressed, particularly the need for massive on-site storage capacity which cannot be charged by the ditch or the water table to allow retention of runoff until conditions allow outflow.


N.T.S.
PROPOSED CULVERT (FULL DETAIL NOT SHOWN)
FIFIELD ROAD
~2m DRAINAGE DITCH
ROAD LEVEL
1.45m SURCHARGE DEPTH
~25,500
2no. 600mm Ø CONCRETE PIPES BENEATH PROPOSED ROAD.
98mm HYDROBRAKE
S1.5
PROPOSED ROAD LEVEL
150mm Ø SW DRAIN
IL= 26.311m
SITE BOUNDARY
OUTLET PIPE DOES NOT PROJECT INTO DITCH.
1
0
-1
-2
1
2
3
4
5
6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FIFIELD ROAD
~2m DRAINAGE DITCH
98mm HYDROBRAKE
S1.5
PROPOSED ROAD LEVEL
ROAD LEVEL
1.45m SURCHARGE DEPTH
~25,500
150mm Ø SW DRAIN
IL= 26.311m
SITE BOUNDARY
Ditch section profile at 1.45 m depth
2no. 600mm Ø CONCRETE PIPES BENEATH PROPOSED ROAD.
OUTLET PIPE DOES NOT PROJECT INTO DITCH.
1
0
-1
-2
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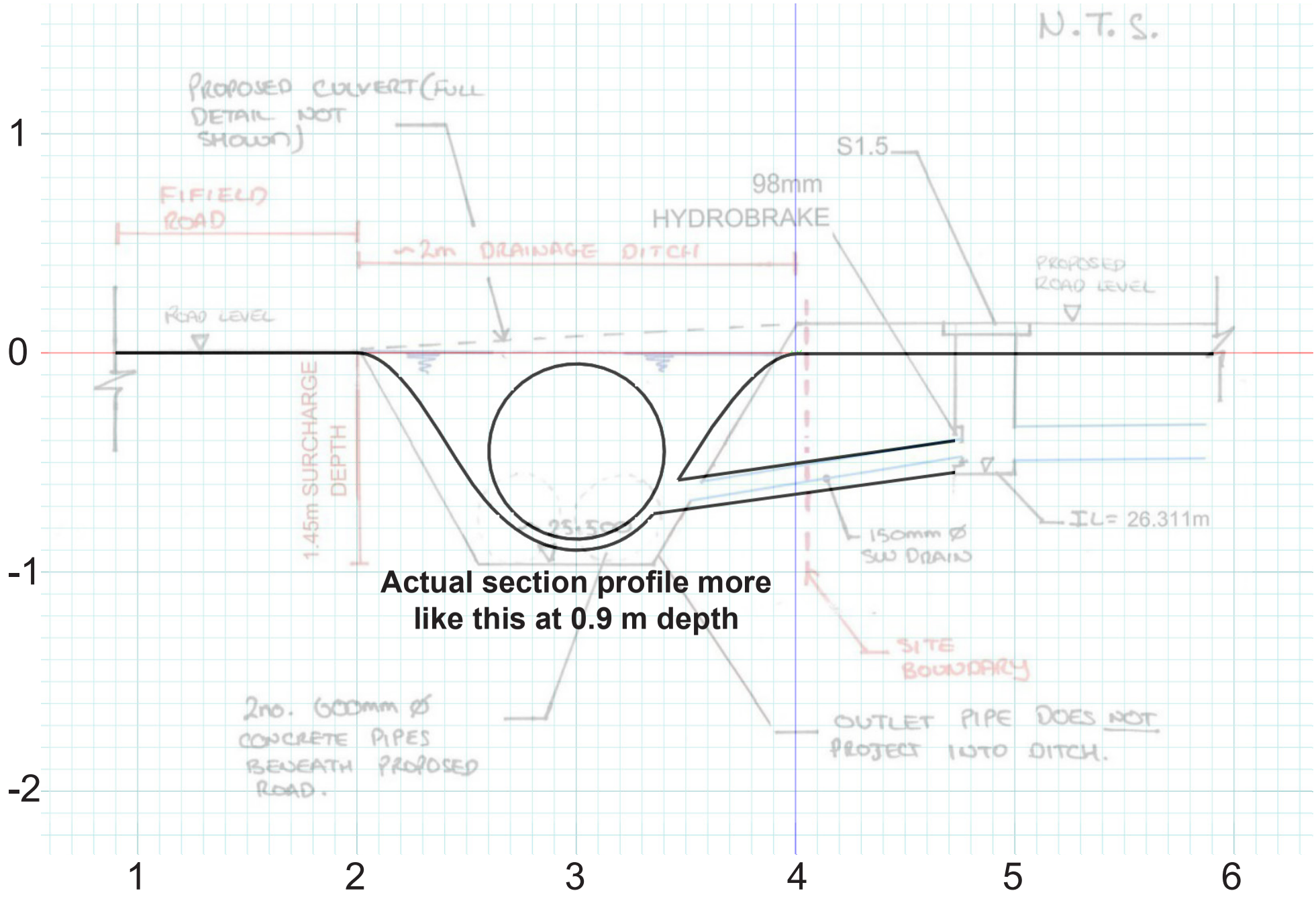
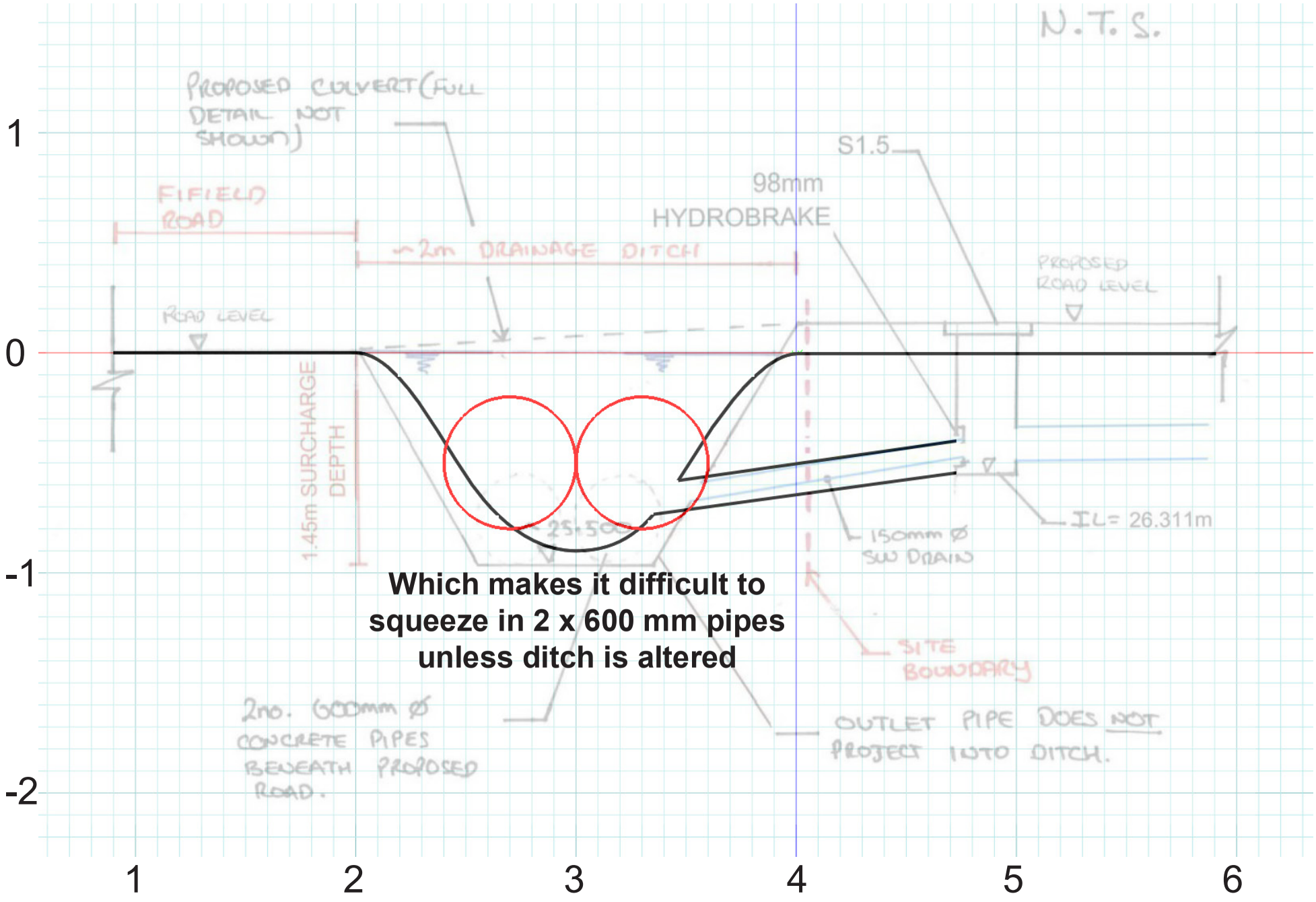
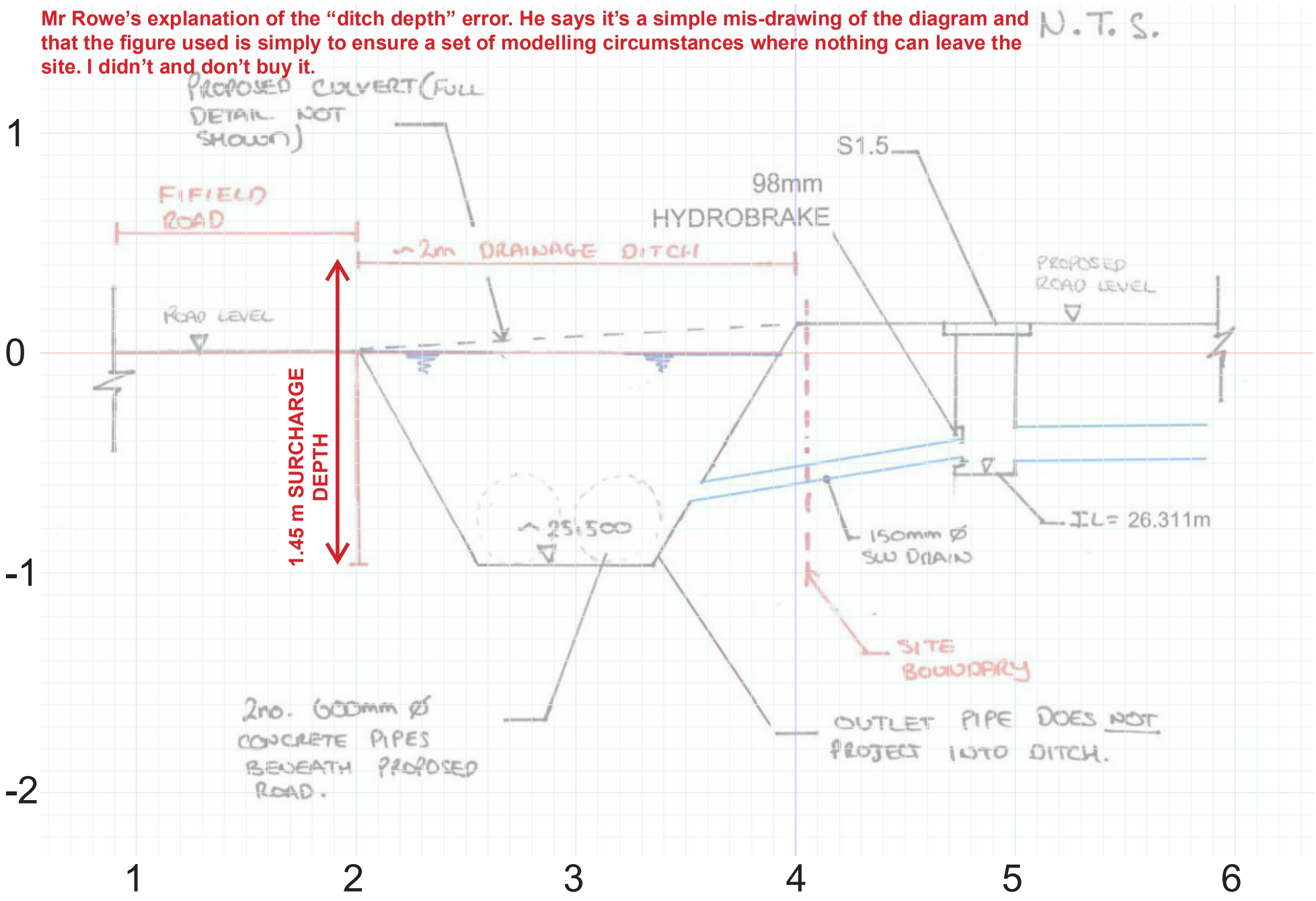

N.T.S.
PROPOSED CULVERT (FULL DETAIL NOT SHOWN)
FIFIELD ROAD
~2m DRAINAGE DITCH
98mm HYDROBRAKE
S1.5
PROPOSED ROAD LEVEL
ROAD LEVEL
1.45m SURCHARGE DEPTH
25+50
150mm Ø SW DRAIN
IL= 26.311m
Actual section profile more like this at 0.9 m depth
SITE BOUNDARY
2no. 600mm Ø CONCRETE PIPES BENEATH PROPOSED ROAD.
OUTLET PIPE DOES NOT PROJECT INTO DITCH.
1
0
-1
-2
1
2
3
4
5
6



Which makes it difficult to squeeze in 2 x 600 mm pipes unless ditch is altered

Mr Rowe's explanation of the "ditch depth" error. He says it's a simple mis-drawing of the diagram and that the figure used is simply to ensure a set of modelling circumstances where nothing can leave the site. I didn't and don't buy it.




1.82 m
1.45 m