

GROVE RESIDENTS GROUP

To: Chairman and Councillors' – Grove Parish Council

Grove Airfield Development

GRG was very pleased to receive the invitation from GPC to extend the current level of co-operation relating to the above development. It has always been the group's intention to bring issues of wide interest into the public domain, to inform residents and encourage them to express their views. Hopefully, any information provided to you will be promptly shared with the whole parish council and Grove residents. Whilst it is appreciated that the developers may wish to hold "confidential" talks with GPC these may not have any substance until the full cost of suitable site drainage has become known.

The following is forwarded to initiate this information-sharing, and because it may be of interest to Parish Councillors: -

Your attention is drawn to the concluding part of the Inspector's report on the Vale Local Plan, dated November 2005. The text is reproduced in full below. Particular passages have been highlighted.

"8.12.4 Although there have been a large number of objections on flooding (issued), relating to both on site and off site drainage concerns, the EA is quite clear that the site is not within an indicative floodplain, being on a plateau about 10m above the level of the Letcombe Brook, and that there need therefore be no objection in principle to the development of the site for new housing. In their view, which I endorse based on the inquiry evidence, the areas of the site that are periodically covered with shallow water (e.g. after heavy rain) are essentially the result of surface ponding. This is largely due to the nature of the geological strata underlying the site and possibly the works carried out to build the wartime airfield, rather than any general propensity of the site to flood inundation. The application of policy DC13, as well as PPG 25 (and the SPG), requires that *a full flood risk assessment be prepared and agreed as part of the initial development control process, before any new housing is permitted on this site. This would only prove acceptable if it demonstrated that there would be no increase in flood risk for new or existing residents, taking into account the local geological conditions. These include the presence of a possible artesian water table, indicating that certain types of SUDS techniques may not be possible for this site. Subject to that, I agree with the EA and the Council (and the EIP Panel) that there is no reason to preclude the allocation of this site for new housing in relation to on site flooding.*"

Interestingly, not only are the inspector's conclusions conditional on a full flood risk assessment, but he also states the site features that lead him to those conclusions. His conditions are extremely important, but, more significantly, the basis upon which his judgement depended is now shown to be incorrect.

You are reminded of some recent evidence relating to aspects of this report : -

(a) There is now convincing photographic evidence that the airfield site is not a plateau, as the inspector had been told, but slopes to the north (with a height difference of over 15m between south and north boundaries). It is hardly surprising therefore, that the north side of the site and the adjoining road frequently flood, and the claim that this is due to 'ponding' is incorrect.

(b) Contrary to the statement that the "plateau" is 10m higher than Letcombe Brook, the lowest point on the site is several metres lower (*) than the brook at its closest point. This means that the brook cannot drain water retained in the sub-soil layer, even in the event they are connected below ground level.

(*) The OS map shows a point near St Ives lane at 80m elevation, and the 70m contour lies just south of the Williams site. Hence Letcombe Brook at the Green can't be at more than 75m. The baseline studies show the lowest point on the development site as 71m.

It is clear that, although the inspector acknowledged, "- - - there have been a large number of objections on flooding - - -", Vale Planning dept made no effort to substantiate its views (now shown to be incorrect), despite the availability of definitive information from OS maps.

There are some other important points within the inspector's conclusions : -

(i) The fact that the EA "is quite clear that the site is not within an indicative floodplain" is irrelevant, since EA decided that its criteria for marking an area as a floodplain require them to be adjacent to main watercourses. Pluvial flooding (i.e. flooding created by rainfall onto areas remote from watercourses) does not meet this criterion. Hence the site is not shown as a floodplain in EA flood maps simply because there is no main watercourse flowing through it. **But the area is prone to frequent flooding, and the only reason it is not marked as a flood plain is EA's choice of criteria.**

(ii) The inspector stipulates that a full flood risk assessment is required in the initial stages of the development control process, and that it is agreed – not imposed by the planning authority over all reasonable objections.

(iii) He also states "This flood risk assessment would only prove acceptable if it demonstrated that there would be no increase in flood risk for new or existing residents."

(iv) Potential outflow from the retained subsoil water has not yet been studied. As a recent communication pointed out, this could constitute a major flood risk, both locally and downstream. The possibility has been ignored however, due to the incorrect impression of the site topology.

In summary,

the geography at the north section of the site means it is excluded from EA flood maps under their current criteria, despite its regular flooding.

It appears that Parish Councils' agreement is an essential condition to the acceptability of a flood risk assessment.

Such an assessment must demonstrate that no increase in flood risk will result from the development, either to new or existing homes.

-A flood risk assessment would be incomplete if it did not include expert investigation of the possibility of flooding from the sub-soil layer on the site.

The inspector's conclusions were based on a completely erroneous understanding of the site geography. It follows therefore that his overall conclusion that there is no flood-related reason why the site should not be developed for housing is unsound. On the contrary, the evidence shows it to be totally unsuitable for major housing development. If the proposal is to be pursued, there is an urgent requirement for it to be impartially and more thoroughly re-examined.

Whilst this proposed development lies within the boundaries of Grove, it will substantially affect the neighbouring communities. You will recall that both Woodhill and Childrey Brooks overflowed their banks during the flooding of July 2007, causing increased flow toward these communities, as well as the Ock basin around Abingdon. With this in mind GRG suggests that GPC consider a joint meeting with Councillors from East & West Hanney and Denchworth with a view to establishing a liaison between affected parishes. This would undoubtedly help to ensure that local knowledge is taken into account when outline plans are submitted.

GRG appreciates all the above details only relate to the drainage issues regarding the proposed development but are quite aware of residents concerns relating to other issues.

10 March 2010