



ENV_17-00997-CONDIT_03

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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

My apologies for the time it has taken me to be able to devote some attention to this matter again. I have now had a chance to study the new documents submitted by WSP dated November 13 2017 and also read through the minutes of the meeting dated 13 October 2017 which they refer to. It is an extreme disappointment to note that none of the issues highlighted by us after our meeting with you, Project Centre, and the Applicant on Friday July 14 2017 appear to have been addressed at all. It also seems glaringly obvious that whoever has now taken on the Consultancy task at WSP has not bothered to look at either our 3D modeling work or any of the previous considerable quantity of discussion and questions raised by us over a very long period of time. Please excuse the constant repetition but I need to draw these to your attention once again as the professionals seem to feel these questions do not require answers of any sort. I'm afraid we remain convinced that they are CRUCIAL.

1 - Immediately prior to this latest submission the on-site storage capacity of approx 485 m³ was 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 we can only assume that the figures are not disputed. So the issue remains a serious concern. The new plan drawing detail of the entrance area shows an additional storage swale to REPLACE the previous 43.5 m long 400 mm diameter pipe. Together with the 2 associated chambers this represented approx 6.77 m³ of on-site water storage. Without adding the new swale to our 3D model and recalculating the resulting metric volume we have no way of knowing how much additional on-site storage is created by this but I think we can quite safely assume that it does not provide the 396 m³ shortfall. This matter therefore remains a cause for serious concern. For some reason neither the Applicant nor their professional advisers seem ready to deal with this and as a result real doubt must still be cast on the insistence by the Applicant that all runoff can be kept on site and that the SUDS scheme as proposed is appropriate.

2 - Once again the minutes note an assertion that there is no groundwater or water table. As we have repeatedly pointed out local knowledge and experience over many decades suggests this cannot be true despite an earlier submission of a Geotechnical Survey. The 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 relatively 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 THEMSELVES ! 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 ! Once again the Applicant and their professionals seem to feel it is perfectly acceptable to ignore these problems and make no attempt to deal with them.

3 - The Applicant has suggested that what they propose will actually be an improvement on the current situation. We have repeatedly tried to point out that this is far from the truth. Surface water at this site tends to collect because it is prevented from flowing off into the ditch by the lie of the land that in effect has a low "bund" or slightly raised profile around the area. The Applicant has acknowledged in the past that surface water collects at this site over a substantial area to a depth of 2 inches or more and remains there. The effect of this proposed scheme will be to deliver all of this surface water in addition to the runoff from a very large square area of roof and hard surface into the ditch which currently is excused from having to accommodate it immediately. We cannot interpret this as an improvement ! At this point we need to remind you that the substantial amount of surface water that collects here will also be topping up the swales and sub car park absorbing volumes reducing their capacity as we have also repeatedly pointed out. These points have been made repeatedly but seem never to trigger any attempt to answer them or explain how they will be managed.

4 - During our meeting in July there was discussion concerning an item in a submission document by MLM which stated :

*"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 had been hypothesised by MLM as 7 days. There was some consternation in the meeting 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 ? Once again there has been absolutely no attempt to deal with this question or to reconsider it or to follow up on where we left off at the July meeting when there was an undertaking by the Applicant to investigate it.

5 - So now we come to the content of the recent submission from WSP. As discussed above this has in effect added a rather small amount of on-site storage by replacing an oversize pipe with an open swale but substantially the drawings are really concerned with the entrance to the site across the existing ditch and outflow from the site into that ditch. These were concerns raised by Project Centre in July 2017. I have spent much of my professional life having to interpret technical plan and elevation drawings for the purpose of translating them into viable 3D digital models. I had some trouble with these drawings and found that it helped to create my own elevations actually based on the plan view rather than some hypothetical schematics. These 2 diagrams are included in this document following this letter.

5a - I spent quite a long time studying the new plan detail before coming to the conclusion that it is not possible for this to work in reality. The slopes of the new excavation at the outlet from the site running alongside the entrance road towards the ditch are shown as curving nicely in either direction to blend into the run of the existing ditch. Looks very nice but it then becomes worrying that the site entrance roadway is doing something similar to join the main Fifield Road. But the entrance curve is overlying the ditch curve and in reality it would be impossible to achieve this without some sort of bridge support suspended above the ditch and carrying the roadway clear of whatever is below. It does not look from the drawing as if that really is the intention as there is less than a meter below the road before the top of the box culvert. I can only assume that the box culvert is actually performing the function of "bridge". So if the distance between the bottom of the entrance roadway construction and the top of the box culvert is

actually road base and soil then what is shown on the plan view is actually impossible to achieve.

5b - The box culvert is shown as lying half a meter below the bottom of the existing ditch and the top of the box culvert is shown as barely above the bottom of the existing ditch. So in reality the existing ditch will need to be sloped down an additional half meter on either side to meet the bottom of the box culvert. Prevailing conditions in the existing ditch mean that it won't be long before the lower area is rapidly silting up and will need constant maintenance and cleaning out.

5c - The flap outlet into the new excavation off the existing ditch is shown as being approximately 0.6 m or 0.7 m below the surface. Conditions in most wet seasons mean that this will be under water for long periods of time preventing discharge unless the outflow is pumped under pressure which does not appear to be a suggestion at present.

5d - Are SEW aware that their 1.2 m diameter pipeline whose crown is only 1.2 m below surface will actually be exposed by this excavation ? I know that when we have raised this issue in the past over and over again it has been dismissed by the Applicant and their advisers to be dealt with at some future time and that there are good professional relationships with SEW which mean that it will all get sorted alright in the end. But it can only be considered worrying if drawings are constantly being produced which ignore this reality.

Confidence in professional competence can only be called into question when drawings clearly have little chance of representing final reality and straightforward questions from amateurs are ignored. At the very least we should be able to expect professional drawings that attempt to represent what might actually end up being put into practice instead of a rather lazy almost contemptuous and arrogant assumption that amateurs will not notice blatant anomalies and practical impossibilities.

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 STILL 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. And the proposals for how the entrance way and discharge into the existing ditch might work are simply not believable in their current form.

If it would be useful and possible maybe we could have a short meeting with Remsha of Project Centre for her to explain to us why she considers this proposed SUDS scheme is viable ? We are only extremely concerned that these proposals do not make an already bad local situation much worse. If such a meeting is considered useful perhaps Robin Howard might also attend as he is taking on the drainage task for OGAFCA as I am stepping down.

The expectations of our local Community that this matter will be properly scrutinised to be absolutely sure that whatever scheme is approved will really work properly in practice and a satisfactory conclusion reached now rests with you. A heavy responsibility.

Thank you once again for allowing us a voice.

Yours sincerely

Rod Lord
OGAFCA Environment

Please see Diagram 1 and Diagram 2 on the following pages

Diagram 1

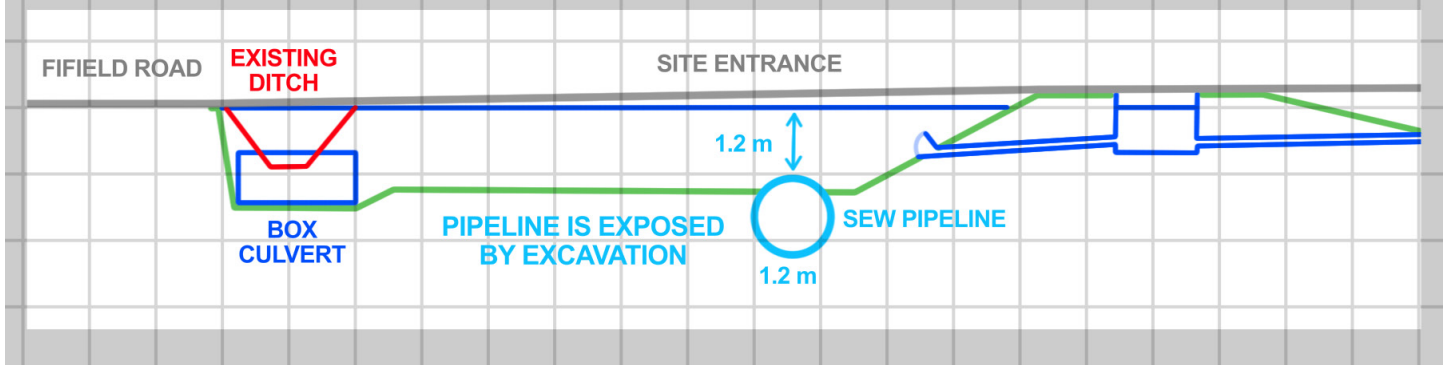
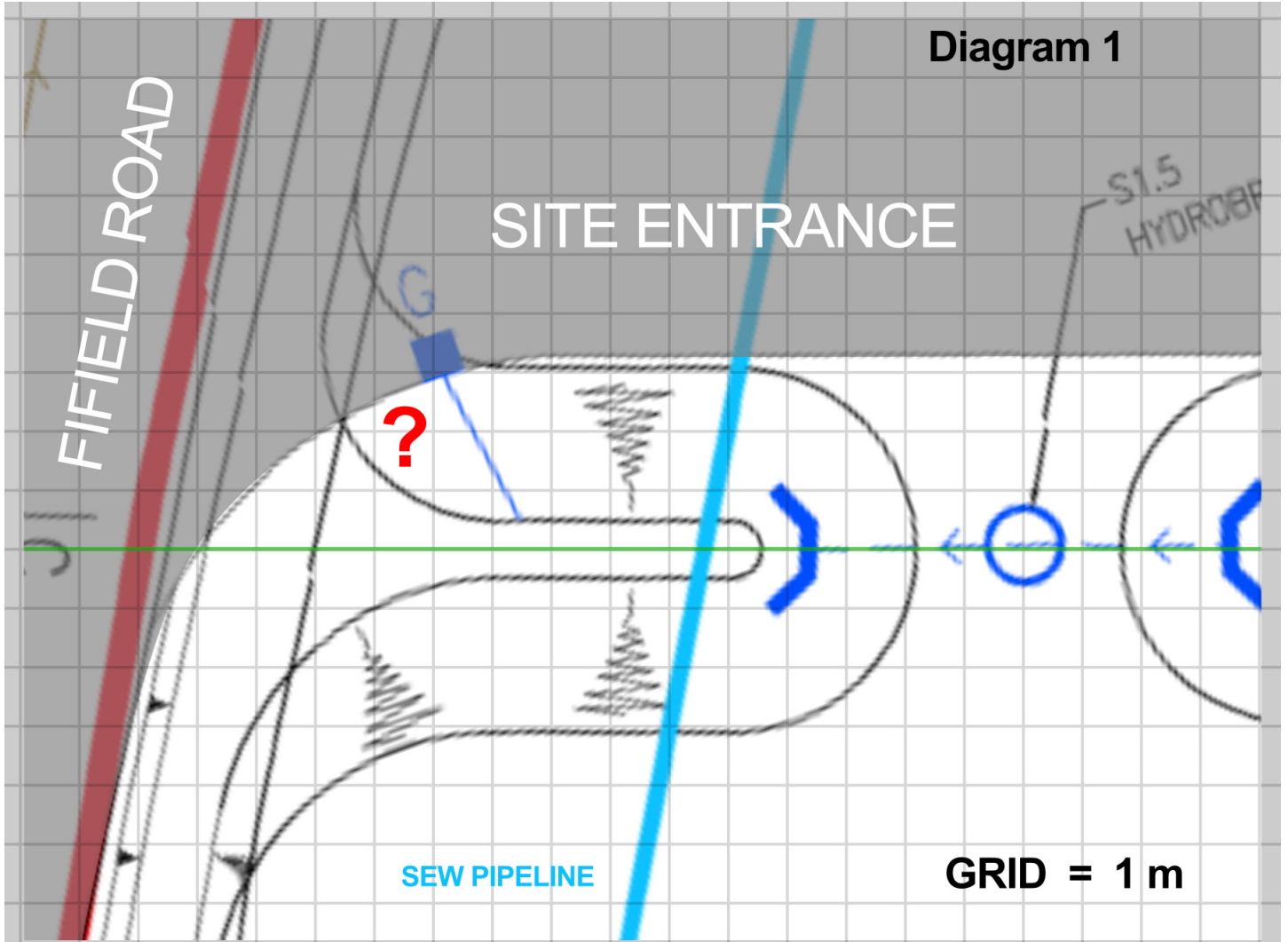


Diagram 2

