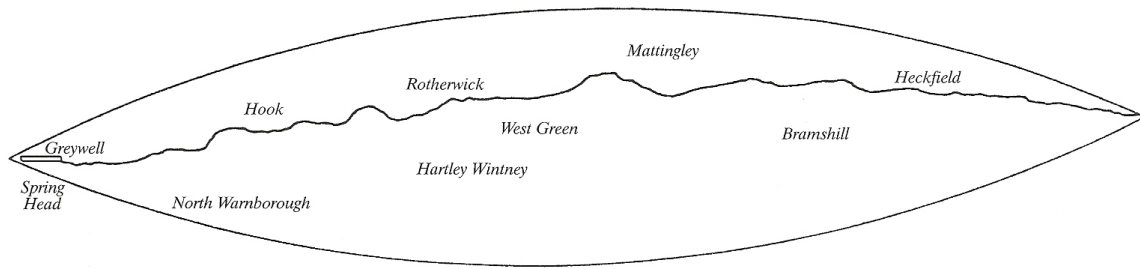


The Whitewater Valley Preservation Society



Aimee Harris
Hart District Council
Email to planningadmin@hart.gov.uk
6th July 2022

22/01347/EIA

Request for Scoping Opinion in relation to redevelopment proposals of approximately 32 hectares (ha) land at Lodge Farm, North Warnborough

Dear Ms Harris,

Whitewater Valley Preservation Society (WVPS) asks Hart to consider the following points which contradict the applicant's statements in respect of scope for the Environmental Impact Assessment, in particular on the subjects of flooding of the area, the potential impact upon the River Whitewater and the capacity problem faced by Thames Water.

Impact on the River Whitewater

Glanville's Flood Risk Assessment at paragraph 2.5 notes that the soil types in the proposal area are naturally wet and have impeded drainage which will drain to local groundwater or the stream network.

Underlying soils will have high groundwater levels due to the proximity of the River Whitewater therefore infiltration drainage will not provide a means of disposal of surface water.

The Society contends that further explanation and more details of effective mitigation are required, given that the proposals recognise and identify a flood risk which, WVPS contends should constrain development.

The Environment Agency classification of the River Whitewater is that it already fails to meet Good Ecological Status (GES) as is required under the Water Framework Directive for all rivers and water bodies.

A recent 3 year study by Salmon and Trout Conservation UK at six locations along the river identifies pollution by a range of inputs, phosphates, chemicals, siltation and sewage.

The proposed mitigation scheme which involves channelling surface water runoff from the development into the river risks exacerbating the pollution and preventing the river's improvement to achieve its goal as GES.

The Society asks you to require surface water management to be included as in scope for the Environmental Study.

The report fails to identify that the area around the site in Hampshire is defined by South East Water as a water stressed area, and water consumed by the site will further increase that situation to the detriment of all existing and future users.

Further, no accurate assessment of any impact on the Whitewater, or the surrounding flood plain, is possible until the effect of the cessation of abstraction at Greywell circa May 2023 has happened and its effect carefully monitored.

Sewage

In 2014, Thames Water stated that capacity to accommodate significant growth was not available in the North Warnborough area. Since that date there have been many incidents of sewage overflow from Greywell, North Warnborough and Holt Lane and no upgrade has taken place on the network.

Recent housing developments in the area have been required under Grampian conditions to provide sewage storage tanks to be pumped into the system when capacity allows. This increases the risks of catastrophic sewage flooding into the Whitewater and nearby houses.

The record of sewage overflows at various Thames Water pumping stations is a matter of recent record and no network improvements have tackled the basic problems of being overwhelmed by significant rainfall events.

The Glanville Flood Risk Assessment report for sewage takes an astonishingly irresponsible approach of wishful thinking and I have emboldened the relevant words to explain the Society's view:

Sewer

4.9 The Hart SFRA (2016) includes data from Thames Water DG5 sewer flooding register. This register provides information on the number of recorded sewer flooding incidents by postcode area. The SFRA indicates a total number of 5 recorded incidents of sewer flooding within the RG29 1 postcode area. It should be noted that maintenance work **may** have been undertaken by Thames Water since the flooding incidents occurred, and therefore the risk **may have been reduced or removed**. As such, these records **do not necessarily** represent the current or future sewer flood risk situation.

4.10 It is **therefore reasonable** to conclude that the risk of sewer flooding to the site is low and is not an issue that would prevent the development of the site for its intended use.

The "therefore" in 4.10 is totally inaccurate and the Society requests you to seek advice from Hart's own drainage engineer whose predecessor was closely involved in a flood alleviation scheme for Mill Corner which included flooding from the sewers at times of heavy rainfall and who was also aware of sewage problems in parts of Derbyfields.

Landscape

Illustrations of the visual impact of this development in the Pre-Application 22/01355/PREAPP upon a current open agricultural landscape will be devastating to all public rights of way (PROW) users and many points within the nearby Conservation Areas and particularly the valley of the River Whitewater and the residential properties within the scope of the document.

Bats

The applicant makes no mention of the nationally recognised bat colonies located in the Greywell Tunnel in close flying proximity to the site and the Whitewater. The bats are regularly seen feeding along both the Basingstoke Canal and the River Whitewater corridors to feed. The introduction of lighting needs to be in scope in the ES to study the impact on the insects which are vital to the bats.

In summary WVPS requests you to require that the scope of the ES be extended to include surface water management, sewage and lighting.

Finally, we would respectfully note that these are points which we have highlighted in the very short period of time available for comment and we reserve the right, on careful and considered reading of the document, to raise further points.

Yours sincerely,

Candy Burnyeat
Chairman, Whitewater Valley Preservation Society