

## Thames Farm Action Group

An open letter to the SODC Planning Committee, for 16 July 2025 Meeting

Ladies and Gentlemen and Alternates,

### Thames Farm Planning Applications P24/S2642/FUL & P24/S2651/DIS

TFAG (Thames Farm Action Group) is a residents action group and has 240 registered supporters and funders, and over 1,000 local people signed the petition against this development.

We have the support of the 3 Parish and Town Councils of Henley, Shiplake and Harpsden.

We are taking the unusual step of writing to you directly, as the time available to us to address you on 16 July is incredibly short - too short for such a complex and important matter that has a 10 year history.

We think that you should be aware if not already, that:-

1. The Planning Committee is under a legal duty to consider the environmental risks posed by the proposed works. These include:
  - a. Deep injection ie upto 14m or more, of concrete slurry into a large proportion of a Source Protection Zone 1, directly above an unbuffered aquifer which serves over 50,000 people with drinking water. This is, this Thames Water's region sole supply of drinking water with no backup facility.
  - b. There is no UK precedent, no peer-reviewed case study, and no emergency mitigation plan that has been presented by the Applicant. There is no source protection strategy at this time, despite such a condition having been attached many years ago
  - c. This development strategy is one that has never undergone a full Environmental Impact Assessment (EIA), despite now being recognised by the Secretary of State as needing and requiring one.
  - d. The Environment Agency withdrew its objection to the proposals on 6 June and in lieu requested that a condition be made on any consent that requires the prior approval by the LPA of a source protection strategy/condition in order to safeguard the underlying aquifer.

We remain deeply concerned over this suggestion. Our reasons for saying this are because this condition has been in being since the original consent was granted. It is wholly illogical to add a further identical condition. Moreover this is the single most fundamental of points - indeed an overriding matter of principal to avoid harm or damage to this hugely important regional asset. It is our opinion that such an important issue which has constantly been deferred, delayed and 'kicked into the long grass' should not be left to chance, and should be addressed within the current proposal. It is by no means certain that such a condition can be made to work, and is no doubt why it still remains unaddressed. It would also appear to be a matter that is surprisingly, not covered in the officers report.

2. Thames Water also appear to have an outstanding objection re P24/S2651/DIS, and referred to in their email of 7 February 2025. This is a third Planning Application which bizarrely is not required to come before you. They remain concerned about foul sewage

disposal being addressed after the Groundworks. It is also relevant that, this is a matter not covered by the Applications or in any environmental statements, but which will nevertheless have huge consequences for the centre of Shiplake, when the main road is dug up to increase sewage capacity going to Wargrave works. These works are across the river, and it is not confirmed that the Sewerage works actually have the capacity to cater for this and all the other new developments feeding into it.

3.I f the groundworks Planning Application is refused, the surface water drainage strategy fails, and the site becomes undevelopable at the currently proposed scale. The SW drainage solution is itself entirely contingent upon the unapproved groundworks – and which, in any other context, the Council acknowledges would not be permitted.

4.T he applicants have variously changed the proposed density of development on a number of occasions from an original 110 houses to 95, and latterly to 84. This has been done to accommodate necessary changes. There is nothing whatsoever that compels a development of 84 units, apart from the developer seeking to recover the very high price it paid for the site when it thought the ground conditions were acceptable.

5.T he implementation of the so called extant consent took place without permission. To be clear, the developer constructed the access into the site WITHOUT permission ostensibly as part of its S 278/106 Off site Road works. This **illegal** work was later accepted, as the implementation of that consent by SODC. It was not obliged to do that, but did so nevertheless! (please refer to the officers report).

6.W e now have the ridiculous situation where the Planning Consent is declared extant, was implemented illegally, and yet we are now questioning whether the site is genuinely capable of sustaining the level of development proposed. In the officers report, SODC has said that if it were not for the extant consent, these works would **NOT** be acceptable. We agree with that statement, but question where that statement leads us to.

7.J BA Consulting, expert drainage and hydrology advisors and who have critiqued each successive submission by the applicant, say of the latest submission (the DQRA risk assessment):-

**“Based on the results presented in the DQRA Technical Note, concentrations of pollutants are exceeding Environmental Quality Standards (EQS) or Drinking Water Standards (DWS) when entering the Principal Aquifer and the results of the DQRA should conclude the currently proposed development could potentially cause pollution.....”**

**“.....The DQRA provides no evaluation of worst-case conditions that could result in a pollution event.....”**

**“It is notable that two key documentations have been missed off the reference list and which are widely accepted as Best Practice Guidance in the UK. The first was DMRB LA113 (Road drainage and the water environment). This document describes the requirements for assessment and management of the impacts that road projects can have on the water environment and should have been consulted during this literature review and parameters for water quality of road run-off considered.**

*The second key document missed was CIRIA C609 –Sustainable drainage systems: hydraulic, structural and water quality advice. The document discusses the critical issues that must be considered when designing, constructing and maintaining SuDs schemes to effectively manage rainwater runoff from development sites. It includes information relevant to SuDs techniques, including a discussion about the design and performance of each” “.....As mentioned above, the background concentrations used within the software are taken from a USEPA report from 1983. It is likely that these concentrations are out of date and not applicable to UK conditions. Therefore, more suitable concentrations should be considered.*

*Similarly, the data sources used for some of the specific modelling parameters (e.g. soil-water partition coefficient) are over 30 years old. More recent publications should have been used as part of the literature review to derive these values to ensure appropriate site-specific values are used.....”*

*“.....Until the results of a sensitivity analysis for all key parameters are evaluated with key parameters influence established, the assessment is not providing sufficient confidence that its results are representative of the range of conditions pertaining to the proposed development.....”*

*“.....The applicant’s risk assessment is not realistic, fails to model the proposed development characteristics and therefore cannot demonstrate an absence of risk to a critical infrastructure, the water supply, or the Chalk Principal aquifer.”*

Why is this information being ignored, when each and every previous finding of JBA has resulted in significant amendments to the prior proposals?

The DQRA is fundamentally flawed and not fit for purpose.

Members of the Committee, do please note, that :-

**The Planning Committee retains full discretion to:**

- Refuse the groundwork application.
  - Refuse any associated condition discharge that no longer reflects a lawful or viable scheme.
  - Require of the developer, a new, environmentally sound proposal.
  - Even where permission exists in principle, Members are under no obligation to approve a scheme that is unsafe, incomplete, or contrary to the public interest. They must base their decision on current evidence, with environmental safety at the core.
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8. It is patently clear, that the developer has illegally implemented the consent, knew precisely what it was doing then, as this occurred after it had done detailed ground investigations, and as such, we question, why do we now say they should be allowed to undertake these groundworks, which in any other circumstances would not be permitted.
9. Yes the consent and the principle of residential development appear to be established. BUT....the size and density of the development is not fixed in stone and needs to be revisited, to enable a much smaller scale development, that is not at risk of compromising either the water supply, or the local environment (and in turn residents) through the potential to flood.
10. Flooding has already occurred on this part of the Reading Road, and has inundated many houses, gardens and drives.

Are we really contemplating adding to that?

11. We would remind the Committee that ZERO case studies have been provided or evidence of such works elsewhere.....indeed anywhere,.....and so this entire situation is predicated upon the opinion that it is possible to control concrete slurry at a depth of up to 14m (2m off from the groundwater) and that it will remarkably stop mid flow, despite there being voids in the ground that it is designed to fill. These are the very same voids, which may perfectly well take that slurry and any other material it touches to places it was never intended to go.
12. We are asked to believe that a dense grid of 6m x 6m square of concrete platforms and 3m deep vibro compaction on top of that, across most of the surface area of this 15 acre site will not interfere with the volume and flows of this hugely important aquifer! Is that really plausible?
13. A much smaller residential development could be undertaken at Thames Farm and would not place our drinking water in harm's way or at risk. The only reason this is not being promoted by the developer is that it paid far too much for the site in the belief that the ground was good! It did no serious due diligence at the time of acquisition.
14. We pose the question, if these experimental works are permitted to go ahead, who will correct any problems that result, are those problems capable of remedy, how will 50,000 residents, the young and the elderly cope?
15. It is perfectly feasible to develop this site for residential development with a much smaller built area and without putting at risk the potable water supply, or the risk of flooding neighbours.

Members, our drinking water is one of the most scarce resources on the planet and in this country - increasingly so with climate change occurring far more quickly than ever predicted. The allowances and plans made even allowing for increases, are inadequate and prone to flood in the most unexpected locations.

We see such matters almost daily on the news!

As a nation, we spend billions increasing the volume of drinking water, and moving it around to where it is most needed.

Why are we now placing it at RISK when it is completely unnecessary!

Members of the Planning Committee, we urge you to apply the hugely important 'precautionary principle'.

If there is scientific doubt (and clearly there is) then the responsible decision is refusal.

Let the developer come back with a properly evidenced, lower-impact scheme that does not place our drinking water at unnecessary risk.

Thank You,  
Peter Boros BSc, MBA,  
Retired Fellow of the Royal Institution of Chartered Surveyors  
For and on behalf of Thames Farm Action Group – 9th July 2025