

**From:** barry shaw [mailto: [REDACTED]]  
**Sent:** 14 September 2018 18:50  
**To:** Reed, Emily <[Emily.Reed@herefordshire.gov.uk](mailto:Emily.Reed@herefordshire.gov.uk)>  
**Subject:** Planning Application 181664 'The Trees', Orcop Hill

Dear Ms Reed,

Notwithstanding our concerns over the property size and many other issues with this proposed development and its effect on neighbouring amenity as outlined in my previous letter dated 4 September 2018 and in the many other objections, I now note the recently announced comments from your drainage advisors with some apprehension.

Whilst this is a relatively small development in the grand plan it is nevertheless extremely important for Orcop Hill residents that we see no further worsening of the drainage problems (smells and contamination) we experience in our hamlet.

I can only repeat that it is important that we can see an objective and rigorous assessment of the method of testing and designing foul water disposal and surface water containment on this site and would comment further regarding the comments in the report.

1. The report states that 'in principal, we would not object to the proposals' but then goes on to state that 'the drainage fields (for the BioDisc treated effluent) should be constructed from perforated pipes' – I agree however the plan shows soakaways not drainage fields (a totally different concept), therefore in principal is not acceptable according to the SuDS handbook, Buildings Regulations or BS 6297. It is doubtful if there is enough space (with relevant clearances and located preferably below the properties) to install drainage fields.

The proposal states that drainage design is to BRE Digest 365 which prescribes stormwater soakaway drainage design not treated effluent.

2. 'Percolation testing has been undertaken in accordance with BS6297'. However a detailed site investigation has not included evidence of a trial hole to show and record; the ground soil structure, ground water level and the appropriate depth to perform the percolation tests required by the Standard. The trial hole should be at least 1.5m below the proposed level of the infiltration pipe – this was not the case. BS6297 states that the LA can advise on variation of seasonal local ground water levels. This is true since there is a good record of winter levels from the Newcastle Farm Site (application 173385) which proved that infiltration methods were 'not a viable option' as stated in the drainage engineers report dated 2 May 2018. Here percolation tests were also demanded for each soakaway/drainage field position. Concerns for this site are the same since it is less than 80m from Newcastle Farm and on similar topology (clay overlying impermeable sandstone) and hydrogeology. The soakaway design states that all tests were carried out to BRE Digest 365, however this would require the entire pit to be filled with water for testing – this was not the case.

3. To further support our concerns regarding drainage the SuDS handbook also states '7.2: With early consideration, SuDS are possible on any site. However in some cases where sites are gently graded or flat and where ground conditions inhibit use of

soakaways, early consideration of the drainage design is essential'. Also '7.4: A robust foul drainage strategy needs to be developed at Outline Planning stage'. Does this confirm that the Outline Planning approval is at fault?

4. The report correctly states the requirement for 'a design calculation factor of safety of 2' and for 'a maintenance plan for the soakaways'. Neither of these have been provided – again defying the principal of acceptance.

5. The second report reviews only two objections namely; dubious percolation tests (discussed above) and the closeness of identified hydrological features, etc. The 'General Binding Rules' require that soakaways should not be located less than 50m from springs or wells, 7m from property, 10m from a water course or ditch, 2m from a boundary and not adjacent to driveways or paved areas. Arguably most soakaways on the plan contravene these stipulations since there is a footpath and run-off ditch bordering the site, a well in Lark House garden, a spring in Bramble cottage garden and at The Copywell and large areas of paving plus three houses and garages. Is the site large enough to satisfy these conditions, the proposal may need to be reduced to two dwellings?

6. The following important objection points have not received comment;

6.1 No ground water level investigation or advice.

6.2 No soil structure breakdown given.

6.3 Building regulations state that 'the percolation test should not be carried out during abnormal weather conditions such as heavy rain, severe frost or drought'. This test was undertaken at the end of the summer drought and results are therefore inadmissible!

6.4 Will proposed landscaping tree roots interfere with drainage fields?

Orcop residents need a thorough and indisputable assessment of this plan to be confident of a satisfactory future development. I hope you can consider these further comments in your deliberations towards the right decision.

Yours Sincerely

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