TAKELEY STREET ACTION GROUP (TSAG)
FORMAL PLANNING REPRESENTATION

FLOOD RISK & DRAINAGE OBJECTION

Planning Application:
Land North of Taylors Farm

Application Reference:
UTT/25/2786/OP

Local Planning Authority:
Uttlesford District Council

Submitted by:
Takeley Street Action Group (TSAG)
A local residents' action group representing +600 residents of Takeley and neighbouring towns and villages.

This document forms part of a coordinated set of technical objections submitted by TSAG in response to the above planning application.

Document Status:
Formal Written Objection

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This representation is made in the public interest and is intended to assist the Local Planning Authority, statutory consultees and members of the Planning Committee in reaching a lawful, informed and sound planning decision.

Takeley Street Action Group response to Flood Risk and Drainage

1 Introduction

1.1 The Drainage Strategies for both Foul and Surface water are unconvincing. There is no clear evidence that foul water discharges can be accommodated at Takeley Wastewater Treatment Works and no other solution is offered.
1.2 The Surface Water strategy involves sending flows through third party land for which there is no easement and no possibility for access for regular maintenance.
1.3 SUDS have made it clear that they have insufficient information to assess the proposed development.
1.4 Hatfield Forest SSSI is placed at serious risk from pollutants generated by this site.
1.5 Thames Water were unable to determine Foul Water Infrastructure needs for the application

This application must be refused.

2 Foul Water

2.1 In their Scoping Opinion, point 44, Uttlesford noted "*It is also insisted that developers demonstrate that there is adequate capacity for the development in the wastewater infrastructure. As in the case of the water supply network, where capacity is lacking, the developer and Thames Water must demonstrate that mitigations and/or improvements are identified and planned within the appropriate work schedule before any development can be approved*".

Thames Water have stated categorically page 199 of 203 of FRA (Site Specific Flood Risk Assessment Oct 2025) "***We've assessed your foul water proposals and concluded that unfortunately we're unable to meet the needs of your full development at this time***".

Thames Water have made it absolutely clear. There is no mains capacity for the development.

2.2 The Developer and Thames Water have **NOT** demonstrated that there will be "mitigations/improvements". What they have said is (page 200 FRA) "*We will only carry out modelling once we're confident that your development will proceed. In order to have this confidence, we'll need to know that you own the land and have either outline or full planning permission*".

Thames Water WILL NOT model whether there is capacity in the Foul Water system unless there is Planning Permission.

2.3 Time Scale for Thames Water modelling

The time-scale for the modelling alone is 9-12 months The modelling is needed to demonstrate whether connection to the sewer work i**s even possible**.

2.4 Timescale for Thames Water to implement construction should connection be agreed

Thames Water has stated that the timescale for construction is up to 36 months. This is **AFTER** Planning Permission is given.

2.5 Timescale for Site Construction

2.5.1 The Developer has stated that construction will begin in 2028 and will take about two years. They have **not** indicated how they will manage Foul Water during the construction phase.

They have simply said:

Para 11.5.23 EIA Water Resources (inc. Flood Risk and Drainage) "*Arrangement for temporary foul disposal will also be required*".

This is entirely inadequate particularly because:

- The site floods
- The site is only 100m upstream from a SSSI
- Shermore Brook traversing the site feeds Old Woman's Weaver (Hatfield Forest) and the SSSI lake
- Residential properties and Hatfield Forest would be at risk

2.5.2 The EIA Socio-Economics claims that "*During the build phase, 967 temporary jobs could be supported per annum on-site …. (estimated to be two-years*)".

Page 14 of the applicants screening request (UTT/24/2682/SCO) was clear: *"Surface water run-off and foul water drainage will be managed on-site during the construction and operational phases"*.

At a ratio of one toilet per seven workers this amounts to around 140 portable toilets as a minimum, plus washing and welfare facilities. This figure would increase to cater for male and female facilities.

In summary: almost 1000 employees on site annually for a period of two years with no foul water system in place and no indication of how this would be managed on site.

The Developer MUST provide this information and a detailed explanation of how foul water will be managed prior to a mains connection – if this is even possible.

2.6 Misleading comments by the Developer

2.6.1 Para 11.5.38 of Vol 1.11 Water Resources - Flood Risk and Drainage Environmental Statement states:

"*Correspondence with Thames Water, appended to the FRA, has demonstrated that modelling is required to determine the impact the Proposed Development will have upon the Application Site. TW is yet to progress, however they have confirmed that this will have no bearing upon the planning application. It is anticipated that the modelling will progress as the Application Site progresses through planning which will inform the required improvements to the public network that will be necessary to cater for the anticipated additional foul flows. Provided that the appropriate improvement works are implemented by Thames Water, the impact of the Proposed Development upon the overall foul system will be* ***negligible (not significant)****"*

- ie: No modelling regarding any necessary improvement will be done by Thames Water until **AFTER** Planning Permission.
- The Developer has **anticipated** many things, but this does not mean they will happen eg: "***Provided*** *that the appropriate improvement works are implemented by Thames Water".* (provided should be replaced with **if**). There needs to be certainty before any Permission is granted.
- The Developer has **admitted** that a foul water solution is entirely dependent on Thames Water but there is no guarantee of when or if this will happen.

The Developer's statement is deliberately misleading and untrue as illustrated above.

2.6.2 The Developer said: "*A Thames Water pre-application was undertaken in May (Ref: DS6138191/DTS78512) noting that sufficient capacity is not available to meet the needs of the full development* ***presently*** *and that off-site reinforcements will be necessary to serve the remainder of the development. The proposed connection points for the development have been indicated by Thames Water"*

This was **not** a pre-application meeting or discussion with Thames Water as the Developer would have you believe. It was a standard Wastewater Pre-Planning enquiry with a specific request relating to 'Capacity Concerns' (Appendix O of FRA) which anyone can access for a fee.

The word **"*presently*"** was not used by Thames Water. This is "*Developer speak*", conveniently giving the impression that "*off-site reinforcements*" would automatically happen when in fact no modelling has ever taken place. When it does, Thames Water could conclude capacity at Takeley Wastewater Treatment Works would not be feasible.

2.6.3 The developer also obtained an Asset Location Search (Appendix O of FRA). Maps of sewage pipe locations are included in the search so that the Developer can review where the most appropriate connection **might** be possible. The sentence should read "*possible connection points indicated by Thames Water*" and not "*The proposed connection points for the development have been indicated by Thames Water*". **What they are proposing and what is possible have entirely different meanings.**

2.6.4 The Developer said "*As the site is proposed to be constructed in phases it is anticipated that the works will be programmed to suit the completion of the future off-*

site reinforcement works", but page 200 of the FRA states that Thames Water can take a further 18 months for the construction phase, - up to 36 months overall.

According to the timeline provided by the Developer, the site could potentially be occupied before ANY foul water system is in place – if indeed it is possible.

2.7 Running surface water through foul water systems

2.7.1 The Developer has indicated their intention of running some surface water through the sewage network but has not attempted to find out whether there is capacity in the network to do so. It seems from para 2.1 above that there is **NOT the capacity**.

2.7.2 Para 11.5.5 of the Flood Risk and Drainage Environmental Statement acknowledges "*Wheel washing facilities will be kept in a designated bunded impermeable area and surplus water disposed of via the foul system".*

2.7.3 Para11.5.9 Vol 1.11 Water Resources - Flood Risk and Drainage Environmental Statement referring to concrete products states "*Any wastewater will need to either be directed to the foul sewerage system or treated and then discharged to the watercourse network once it has reached the required standard*".

New developments are expected to have entirely separate foul and surface water systems, even if treated.

The excuse offered by the Developer is that "*With appropriate mitigation the significance of the risk*" is reduced.

Even if treated, this represents an unacceptable risk to an already overwhelmed foul water system, an area prone to flooding and potential irreversible damage to a SSSI.

3 Treatment Works

3.1 The Uttlesford Emerging Local Plan has clearly identified that foul water from this site should be directed to Bishops Stortford Wastewater Treatment Works at Jenkins Lane "*Wastewater should be discharged to the Bishops Stortford Waste Water Treatment Works to avoid the need for additional mitigation to ensure the Good Ecological Status of watercourses linked to the Takeley Wastewater Treatment Works."* (Page 32 of Draft Local Plan Appendix 2-4 Site Development Templates). This is because issues including capacity were identified with Takeley Wastewater Treatment Works.

The UDC Water Cycle Study – Stage 1 Aug 2022 page 19 (Reg 19) stated "*TW reported that Takeley "STW works well, however it is very small and major upgrades will be needed to accommodate proposed growth…….WwTW has issues with its storm overflow which should be considered should growth be served by this WwTW (overflow operated 76 times in 2020 for over 1000 hours in total)".*

3.2 The Bishops Stortford Independent newspaper (4th April 2024) reported that Takeley Treatment works was in the top ten for sewage discharges in 2023 at 1207.75 hours. In 2024, this increased to 1358[1] hours.

It is evident that without significant upgrade, Takeley Wastewater Treatment Works will not cope with the foul water generated by this site.

3.3 There are NO guarantees this development can connect to any mains drainage. Package treatment plants are not a sustainable solution, yet it appears the Developer intends to adopt this strategy for at least the Construction Phase, given the time scales for modelling from Thames Water.

An employment proposal of this magnitude with circa 2000+ employees on non-mains drainage is completely unsustainable. It conflicts with Core Policy 34 of the newly emerging Local Plan. Approval for non mains drainage would be undeniably immoral and risks significant and irreversible damage to the environment.

The application should NOT be considered until the Developer is able to demonstrate a mains connection is in place BEFORE construction.

4 Surface Water

4.1 This site is prone to surface water flooding. (sections 6.6 to 6.10 of FRA and 11.2.22 Water Resources - Flood Risk and Drainage Environmental Statement)

Water Resources para 11.3.3 "*The surface water flooding is constrained to the south of the west and central parcels which may be attributed to the culvert draining the Site across the B1256 (The Street/Dunmow Road).* ***The risk of flooding can be described as medium to high risk*** *with flood depths up to 900mm deep*".

4.2 Page 200 of the FRA quotes Thames Water as follows: states" *In accordance with the Building Act 2000 Clause H3.3, positive connection of surface water to a public sewer will only be consented when it can be demonstrated that the hierarchy of disposal methods have been examined and proven to be impracticable. Before we can consider your surface water needs, you'll need written approval from the lead local flood authority that you have followed the sequential approach to the disposal of surface water and considered all practical means*".

Page 100 of the FRA, Thames Water states: "*no surface water capacity check requested*".

The SUDS response 25th November 2025 states **"The information provided does not allow us to assess the development".** Suds responded for the second time on 14

[1] https://top-of-the-poops.org

December with numerous queries, issuing **a holding objection on several MAJOR points**.

4.3 Essex Advice Page 129 of FRA states "*at some point during the planning stage you would need to show how surface water would be managed*"

and

"*You would also need to demonstrate how surface water impacts on the drainage system both before and after development*".

The Developer has done neither.

4.4 We have concluded that perhaps this is because the Developer's own consultant has cast doubt on the potential sustainability of this site. Para 11.3.12 of the Water Resources - Flood Risk and Drainage Environmental Statement states "*The watercourse capacity is adequate for the current use in normal conditions, although the capacity of any piped or culverted sections may limit the capacity of the system*".

4.5 Suds Hierarchy

Para 7.4 (Table 1 of the FRA) shows a table with SUDS hierarchy.

Surface water sewer	Water quantity	Yes. Existing private network

The implication is that some sort of private network exists where the Developer will be allowed to discharge surface water. As we understand it, there is no private foul water system available to the Developer. If this is the case, evidence should be provided that this option is genuinely available to them.

4.6 Concrete Culvert below the B1256

CCTV has identified that the condition of the culvert is noted to be poor in some places and in need of repair.

4.6.1CCTV survey

4.6.2 A CCTV survey was suggested by Essex County Council (page 126 FRA). It states "*a query was raised with regard to the viability of the ditch where surface water will be discharged to as the ditch is piped in front of residential properties……the piped ditch could be checked with a camera*"

Presumably the Developer told Essex that the ditch was culverted in front of residential properties. It is inconceivable that they would recommend entry to/underneath private land without the appropriate consent in place.

4.6.3 Para 2.3 of the FRA states: "*Existing surface water runoff from parcels 1 and 2 and parts of parcel 2 discharges south of the B1256 via a concrete culvert. A CCTV survey was undertaken by Cargate Engineering Ltd in March 2025 shows the concrete culvert as a 450mm diameter discharging some 50m south of the B1256 into an ordinary watercourse or ditch. Parts of the parcel 3 will discharge to the watercourse along its eastern and northern boundary*".

The above statement is misleading. It implies that the watercourse is nothing more than land drainage that discharges to an open watercourse. Critically, Shermore Brook **IS** the watercourse and imperative to the survival of Hatfield Forest SSSI. There should be no pollutants flowing to Shermore and no interruption to flow. The Developer has failed to demonstrate through their Drainage Strategy that they are able to achieve this.

Shermore Brook is culverted from the site underneath the B1256. From there Shermore Brook continues under the garden of a residential property. It can then be seen as a visible open water course before being culverted under the Flitch Way, and continuing to Hatfield Forest.

4.6.4 The map on page 134 of FRA states "...CCTV shows outfall beyond B1256 to existing watercourse/ditch". It fails to mention that the "*watercourse/ditch*" (in this case Shermore Brook) is completely within a private garden before running under the Flitch Way (a Country Park) owned by Essex and then continuing directly into Hatfield Forest SSSI where potential pollution is of serious concern.

4.6.5 The map on page 134 (dated October 2025) is not a current base map; it is out of date. The Forest Gate development of 8 houses has been omitted. Bungalows Lolands and Silverdale have long been demolished and are now Deacons, Westholme, Laurel Wood House and Silverdale. There are four further new dwellings on the site of Montjoy and Falaise and further pair of new dwellings on the land immediately East of Forest Gate. See Appendix A.

The accuracy of base mapping is paramount. Decision makers and statutory consultees rely heavily on maps and cannot conceivably understand the context and specifics of the application with such errors

4.6.6 The FRA devotes a significant number of pages – from about page 60 - 80 to an examination by CCTV of the culvert.

4.6.7 In order to take CCTV footage south of the B1256, Contractors, instructed by the Developer:

- drove their camera under a private residence and a rear garden with no permission.
- Obtained and published that CCTV footage of the privately owned pipework including details of private drainage and inspection chambers and potentially their location within private land.
- Entered private land adjacent to Deacons to take additional pictures that have been published.

This behaviour is unacceptable and most likely illegal.

The section concerning CCTV footage and details obtained from 'trespass' over and under privately owned third party land including a private garden should be withdrawn, or the details should be redacted and disregarded by the Planning Officer. Consultees should be instructed to ignore that section of the submission.

4.6.8 The owners of "Deacons" are the riparian owners of the part of the culverted section of Shermore Brook running under their garden and responsible for maintenance. Whilst the Developer may utilise the "*existing ordinary watercourses for surface water discharge*" (Para 3.3 FRA), private landowners are not required to accept additional flow from a new development.

The Developer needs to PROVE beyond doubt BEFORE any permission is given that there will be no additional water from the site running through this culvert at any point in time and that whatever strategy they use will not adversely affect Hatfield Forest Lake which partially depends on the seasonality of flow.

4.6.9 Page 178 of the FRA details a maintenance schedule designed to ensure that the surface water system continues to function as designed.

This is unachievable. Neither an annual maintenance plan nor critical repairs can be undertaken by the Developer to the section under the B1256. This is the responsibility of Highways and would involve road closures. (CCTV footage has demonstrated the section under the B1256 is already damaged and in need of repair.) Similarly, the section under private land (Deacons) cannot be accessed by the Developer.

This casts doubt on the Developer's ability to build a functioning surface water solution. **It further exacerbates the potential of pollution** entering the SSSI into which this culvert flows.

4.6.10 The intrusive CCTV survey included removing a manhole cover on Highways Land adjacent to the site. A document detailing permission granted by Highways would have been expected as an attachment to the drainage submissions. We therefore conclude that no permission was sought or given.

4.6.11 A commentary concerning the 4 pipes within the Highways inspection chamber SW1 (page 46 FRA) would have been expected with some evidence that demonstrates where ALL those pipes originate and their role. Only the culvert under the B1256 is considered. Flow from those other pipes has been ignored.

4.6.12 A **significant** and perhaps deliberate omission is that the pipe entering inspection chamber SW1 from the West originates from the Highway ditch bordering the southern boundary of the site. Had the developer disclosed this it would have demonstrated that the culvert under the B1256 and Deacons not only receives water from Shermore Brook and surface water from the site, but that it also receives storm

water from the highway and presumably a higher volume of water than implied in their submission. See Fig 1 & 2.

It makes no sense why all four pipes would not have been CCTV inspected during an inspection. Footage should be submitted as part of the assessment and include the impact of the rainwater from Highways and discharge from all pipes.

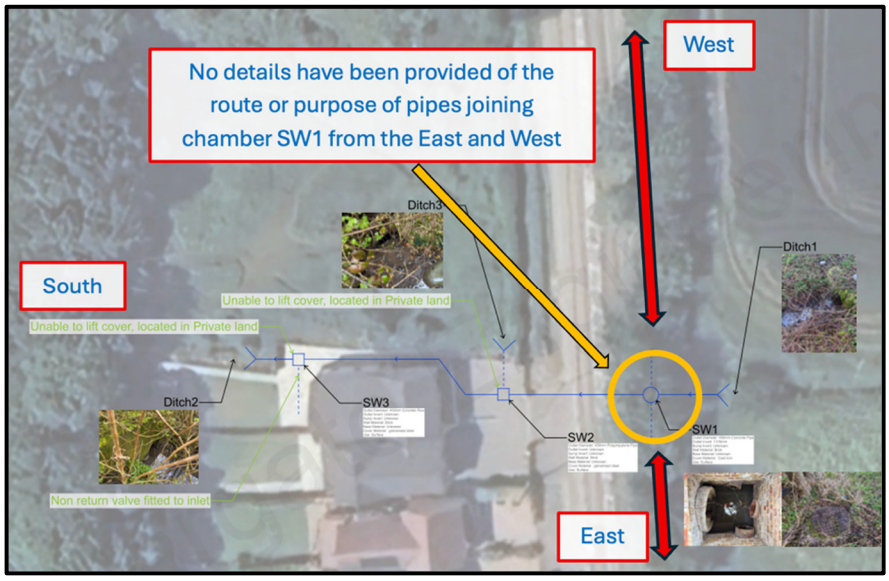


Fig 1
Directional run of pipes that join inspection chamber SW1 from the East and West.

Further investigation relating to Highways drain connection is required

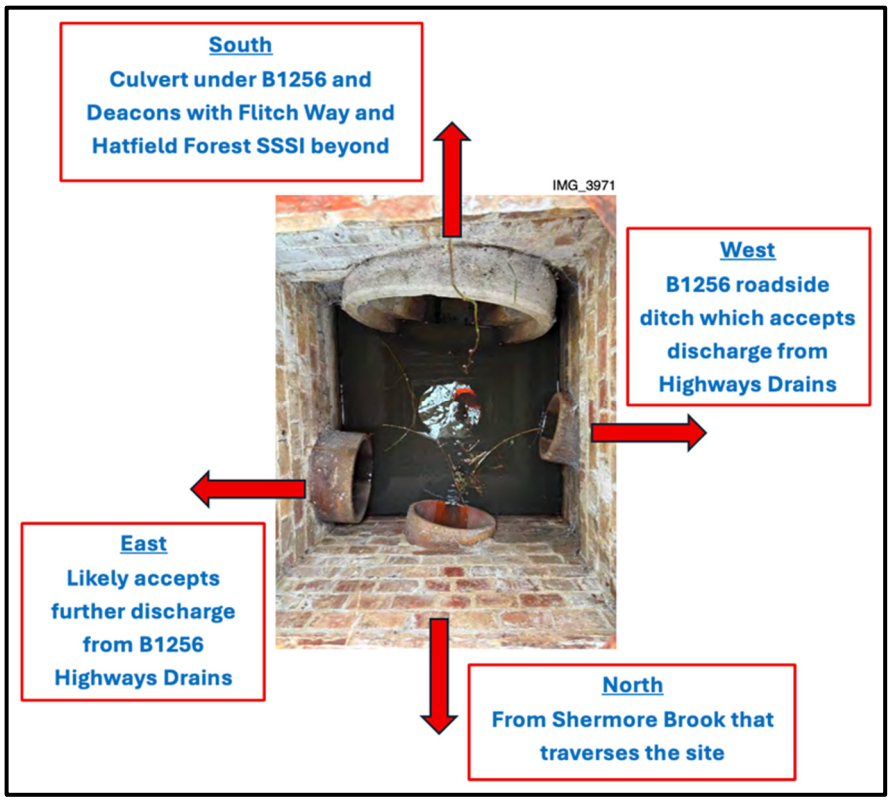


Fig 2
Inspection chamber SW1 highlighting four pipes.

FURTHER CLARIFICATION SHOULD BE SOUGHT AS TO THE PURPOSE OF ALL PIPES IN INSPECTION CHAMBER SW1.

4.6.13 No reference has been made to the B1256 Highways stormwater drains that discharge into the ditch bordering the southern edge of the site. This ditch is proposed to be culverted to construct a filter lane to access the site.

Further clarification should be submitted to include the impact on the drainage strategy of Highways storm water discharging to the watercourse.

4.7 Culverting, removal and re-routing of ditches.

4.7.1 Culverting is generally opposed by the Environment Agency due to negative impacts on ecology and flood risk, so it will only approve applications for culverts if there are no other practical alternatives or the impact is minor.

Planning Inspectorate guidance[2] is referenced below. Their site lists the negative effects of culverting, many which are relevant to this site eg: increased difficulty in detecting the origins of pollution. This site is only a few meters away from Hatfield Forest, SSSI. Surface water drains from this site directly to Hatfield Forest and is the feed for the Old Woman's Weaver and SSSI lake. It can also "*exacerbate the nature of flooding by increasing flow velocities*". PINS give culverting **weight** in their deliberations.

Regardless:

- a central section of the site (page 134 FRA) is to be culverted "*details to be agreed*". (para 7.16 FRA)

- A significant section of a roadside ditch along the B1256 is to be culverted to enable a filter lane for access (despite the Developer telling Councillors during the Local Plan process that there are multiple entrances

- The spine road traverses the two central watercourses and culverting will be necessary (para 7.16 FRA). Details of the culverting will need to be agreed.

There is no evidence that agreement will be reached regarding culverting. As such, the planned access points to the B1256 cannot be achieved and the site is unsustainable. Permission should be refused.

4.8 Page 125 of the FRA states the intention to build over and re-route a ditch. The Developer claims that this ditch receives "*no flows*" and "*appears redundant*". Far from being redundant, the 'ditch' is in fact **Shermore Brook.** It is the **ONLY** feed for the Old Woman's Weaver Great Crested Newt restoration project - 260 yards from inspection Chamber SW1, and the only feed for Hatfield Forest SSSI lake beyond.

Building over it and re-routing has the potential to do severe and irreversible damage to Hatfield Forest SSSI. See Fig. 3.

[2] https://nsip-documents.planninginspectorate.gov.uk/published-documents/TR010060-002411-LIT-16856-Culverting-Watercourses-guidance-16475-3.pdf

Fig. 3
The Old Woman's Weaver Great Crested Newt restoration project within Hatfield Forest SSSI, 260m from CCTV Inspection Chamber SW1. There is a high risk of irreversible harm from the proposed development.

5 Alteration of topography

5.1 Para 7.1.5 states "*Given the likely size of the units it will be necessary to plateau the site to provide gravity drainage*". This implies that the land will be raised to accommodate drainage systems, but it is not clear to what extent or how this would affect surface water drainage.

5.2 The SuDs Water quantity and Quality Technical Assessment Proforma is clear at 2.16 that the "*depth to highest known ground water table*" was 95.00 at trial pit 2. Yet at 2.11 the attenuation positive outlet "*invert level at final outlet"* is only 93.00.

This leaves serious and very significant concerns re the necessity to "plateau *the site to provide gravity drainage*". **The applicant should clarify exactly how much they intend to raise the land. Every metre of land raised effectively adds a metre to the finished height of the buildings with some currently already at 21m.**

5.3 The drainage strategy page 125 of FRA notes the development may need to "resort to underground storage tanks" if attenuation using open water basins are not acceptable.

The Developer is already fully aware that they CANNOT have attenuation ponds or open water in the proximity to Stansted Airport because of the ocular hazard to pilots and the exacerbated risk of bird strike.

Uttlesford's Scoping opinion made it clear that "*The EIA should include reference to detailed technical data on the proposed underground storage tanks, their ongoing maintenance and monitoring and a schedule of upgrades/replacements, to demonstrate the capability of the tanks to discharge clean water back to the environment over the full lifetime of the proposed development*".

This information is NOT included in the drainage strategy or FRA.

The Developer has also visited the National Trust to discuss underground storage tanks as a potential solution to their Drainage Strategy. We understand that the National Trust raised serious concerns about their use. These concerns included issues of potential power failure and maintenance to ensure that Hatfield Forest would not be affected.

We note that the Developer has not indicated the position and size of these tanks, nor where the earth will be deposited. Rather, they have submitted a map on page 203 of the FRA dated 2019 (from a previous failed Local Plan submission) showing water filled basins that they know cannot be used.

6 ECC SuDS - Water Quantity and Quality – LLFA Technical Assessment Proforma

6.1 **Q1.10** The Developer has stated **NO** agreement in principle has been provided regarding discharge.

An agreement in principle is a crucial step in the planning and design process, required before an application can be fully determined or adopted. Before a decision is made Uttlesford must be confident that the proposed SUDs scheme will address the core pillars of SUDS (water quantity, water quality, amenity and biodiversity) and correctly manage flood risk. The evidence to date does not give those assurances.

6.2 **Q 2.8** The source of rainfall data is stated to be FSR (yet notes FEH is the preferred methodology).

The generally preferred UK industry standard rainfall runoff modelling is FEH22 (2022), FSR (1975) methodology is out of date and represents lower data, specifically for events with durations of 60 minutes and above. **We question why the developer chose to use FSR modelling.**

6.3 Attenuation positive outlet and highest known groundwater table (**Q 2.11** and **2.16**). This has been covered in our comments at 5.2 above.

6.4 **Q 2.13** states infiltration to ground tests have NOT been undertaken.

This is not entirely true. Trial pits filled with water overnight whereby the tests had to be abandoned, *"Due to overnight groundwater ingress into the trial pits, infiltration testing was not undertaken"*. (6.3 and page 105 of FRA) See Fig 4.

Trial Pitting

A mechanical excavator was used to form 5no. trial pits (TP01 – TP05) to depths of between 2.00m below ground level (bgl) (TP03 - TP05) and 2.55m bgl (TP01). Trial pits were positioned to provide representative coverage of the site, taking into consideration site constraints at the time of investigation.

Infiltration Testing

It was initially proposed to undertake infiltration testing in 3no. of the trial pits (TP03 – TP05). The trial pits were installed with a monitoring pipe and data loggers and were backfilled with gravel to maintain stability during testing.

Due to overnight groundwater ingress into the trial pits, infiltration testing was not undertaken. Details of groundwater ingress are provided on the enclosed logs.

Fig. 4.
Richard Jackson Engineering Consultants referring to abandoned infiltration testing (page 105 of FRA).

7 Existing Drainage, Watercourses and Flooding

7.1 Para 11.3.11 of Water Resources (inc. Flood Risk and Drainage) states "*There is a network of watercourses that serve the Site and dispose of surface water southwards under the B 1256 (The Street/Dunmow Road) via a concrete culvert, outfalling to a ditch beyond….It is likely that the agricultural use of the Site comprises the installation of land drainage systems which outfall to these watercourses and reduce the moisture content of the topsoil….*"

It is not "likely". There **categorically is** land drainage that was only upgraded in recent years to improve the poor drainage issues relating to this site. It is unclear why the developer has NOT disclosed all land drainage or all culverts. All pipes should all have been CCTV inspected and flow established.

Concerningly one pipe appears to be a further culvert with a brick header wall at the Southern end of the East ditch. Clarification is required on the route, length, condition, where the outfall is, and whether it runs under third party land. See Fig 5, 6,7,8.

Fig. 5.
Land drainage outlet into Shermore Brook (West ditch) central to the site.

Fig. 6.
The three pipes Southern end of East ditch.

Fig. 7.
Close up of culvert with brick header wall at Southern end of East ditch. Route and outfall undisclosed.

Further clarification required.

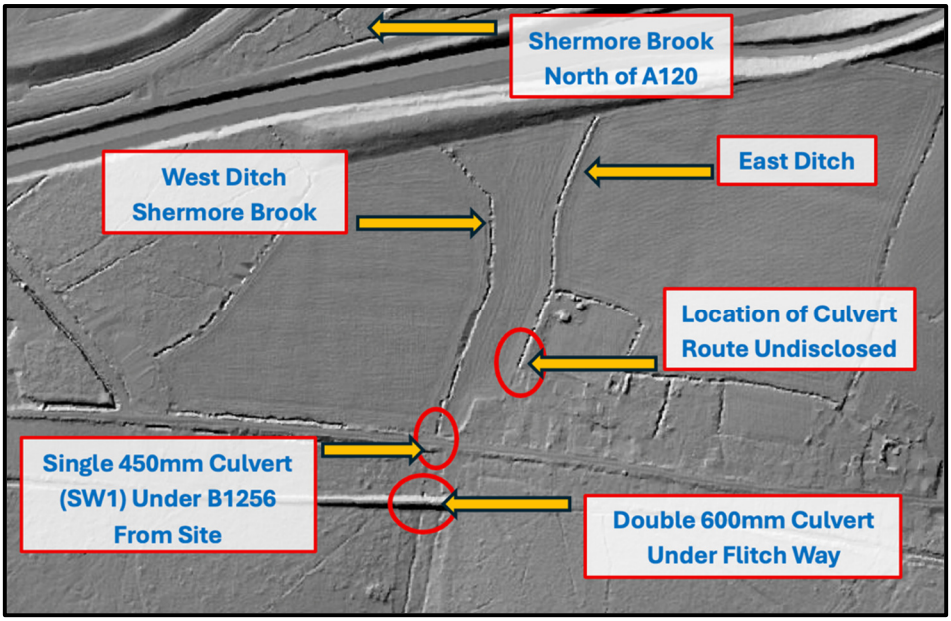


Fig. 8.
LiDAR Map with Location of Shermore North of A120 and undisclosed culvert at Southern end of East ditch etc.

7.2 Para 11.3.3 states "*.....The surface water flooding is constrained to the south of the west and central parcels which may be attributed to the culvert draining the Site across the B1256 (The Street/Dunmow Road). The risk of flooding can be described as medium to high risk with flood depths up to 900mm deep. This surface water flood area is associated with the Flitch Way embankment some distance to the south of the Site. The Flitch Way is a former rail line. The watercourse flows below the embankment in a culvert.*"

Para 11.7.5 states "*An increase in impermeable surfaced area on the Site will inevitably increase surface water runoff rates which, could, without any mitigation, detrimentally affect flood risk downstream on the dwellings to the south, and wider catchment. Hatfield Forest is downstream of the Flitch Way embankment and the capacity of the culvert here will limit flood risk downstream in the future as it does now.*"

This is misleading and categorically untrue. Surface water flooding 'within' the site is **NOT** associated with the Flitch Way embankment further South of the site. To clarify, a 600mm **DOUBLE** culvert runs under the Flitch Way into Hatfield Forest (see Fig. 9 below and Fig. 8 above). The capacity this culvert can take allows a significantly higher volume of water to pass under the Flitch Way than what the single 450mm culvert (SW1) could discharge from the site. Hence the assertion that the culvert under the Flitch Way somehow results in the Site's surface water flooding (as the document states) is wrong. No evidence is provided to support this assertion.

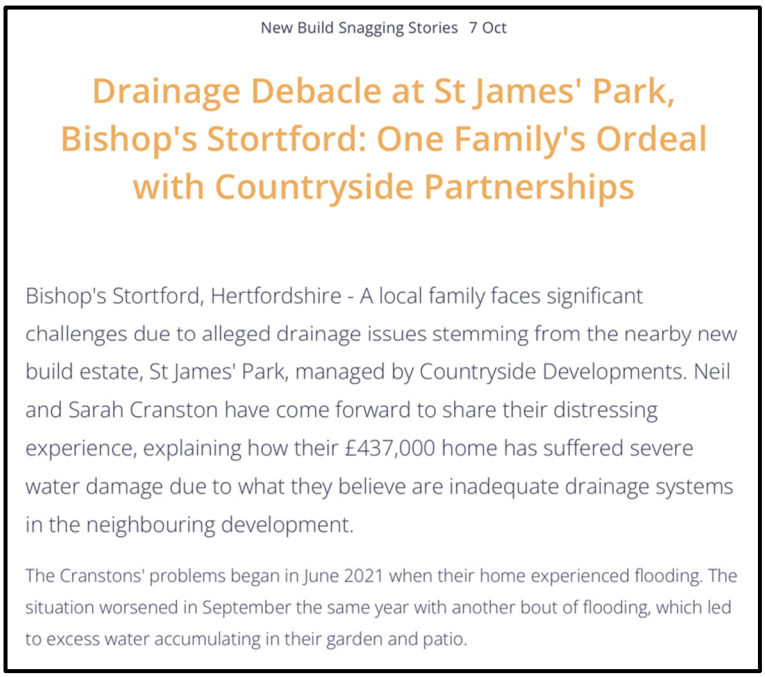
This is symptomatic of the numerous erroneous statements throughout the submission. Planning Permission cannot be granted based on guesswork and supposition, ie not backed up with any evidence. See Fig. 9.

Fig. 9. Shermore 600mm double culvert under Flitch Way – flooding of the SITE is categorically NOT associated with the Flitch Way embankment.

7.3 We do not believe the Developers current drainage strategy is adequate. The decision makers ie: The Committee, Planning Officers and Statutory Consultees MUST be 100% confident the Developer's information is correct and the development will Not result in flooding on or off Site. TSAG are in communication with Astley Warehouse Action Group (Wigan). That application followed planning process but the allegedly sustainable drainage is not working. Residential properties and paths (school routes) are under water. St James development in Bishops Stortford had similar drainage problems following construction as did Elms Farm in Stansted. This must NOT happen in Takeley. See Figs. 10, 11, 12

Fig. 10. Recent Flooding at Astley Development (Wigan) into residential property.

Fig. 11. Recent Flooding at Astley Development (Wigan) onto a PROW.



New Build Snagging Stories 7 Oct

Drainage Debacle at St James' Park, Bishop's Stortford: One Family's Ordeal with Countryside Partnerships

Bishop's Stortford, Hertfordshire - A local family faces significant challenges due to alleged drainage issues stemming from the nearby new build estate, St James' Park, managed by Countryside Developments. Neil and Sarah Cranston have come forward to share their distressing experience, explaining how their £437,000 home has suffered severe water damage due to what they believe are inadequate drainage systems in the neighbouring development.

The Cranstons' problems began in June 2021 when their home experienced flooding. The situation worsened in September the same year with another bout of flooding, which led to excess water accumulating in their garden and patio.

Fig. 12.
Article following flooding from St James Park development at Bishops Stortford.

8 Access

8.1 Further clarification is required as to the highway ditch fronting the Site boundary along the B1256 and HOW the Developer intends to culvert or divert this ditch to construct a filter lane into the site.

8 .2 The area of the site liable to flooding is the location for the proposed emergency access, classified as "**danger to all**" in Uttlesford's own Reg 19 Evidence -Level 2 Water Cycle Study.

9 Shermore Brook

9.1 There are repetitive statements throughout the submission that refer to Shermore Brook running centrally through the site and being dry for most of the year.

Shermore Brook begins north of the A120 but there are no details available to clarify the route it now takes since the A120 construction but it is probable that there is a culvert below the A120. Clarification is required, particularly since the Developer intends to build over and divert Shermore Brook on site putting Hatfield Forest at risk.

Shermore is the **only** feed for Old Woman's Weaver and Hatfield Forest Lake. It is **NOT** 'dry' most the year as stated by the Developer, who has not provided any evidence to support this statement. Shermore does not dry up where it meets the Flitch Way and flows into Hatfield Forest. If indeed Shermore Brook is dry much of the year within the proposed site, then the Developer must establish the source of the water that evidently does flow all year from the site to Shermore Brook and ultimately ensures the lake does not dry up.

Shermore is clearly marked on historic and modern mapping and specifically can be seen on LiDAR Mapping both North and South of the A120. See Fig 8 (above), 13 to18 (below).

Fig. 13.
Shermore Brook route on base mapping.

Fig. 14.
Shermore flowing from under the Flitch Way into Hatfield Forest (December).

The Developer should explain where the volume of water comes since they state that Shermore is dry most of the time.

Fig. 15.
Shermore flowing from under Flitch Way into Hatfield Forest (May) and although at a low level in Spring, it is still flowing.

Fig. 16.
Shermore flowing from under Flitch Way into Hatfield Forest (November).

Fig. 17.
Shermore flowing from under Flitch Way into Hatfield Forest (September)

Fig. 18. Shermore where it enters Hatfield Forest following heavy rain. The culvert visible and functioning as intended.

10 UDC Reg 19 Level 2 Strategic Flood Risk Assessment

10.1 This document Page 99 of 105 notes that a hazard score of "***danger to all***" with isolated pockets along the B1256 and is "*not conducive to safe access and egress*". It goes on to say "*Consideration will be needed for where the site is bisected by the Ordinary Watercourses, in terms of how people may access different parts of the site should flood waters create isolated 'parcels'.*

This is not indicated accurately on any of the maps presented, particularly with regard to the Emergency and Local Access which appear to be the exact same route. Nor is it indicated whether the access will be raised.

This needs to be accurately presented in a map.

10.2 Key points should site be developed.

Page 104 lists six bullet points to be addressed should development be intended. The Developer has NOT fully addressed these, in particular they have not:

- steered development away from the areas identified to be at risk of surface water flooding across the site. In fact they have put an access there.
- demonstrated that development of the site does not increase the risk of surface water flooding on the site and to neighbouring areas.
- Demonstrated that "*if flood mitigation measures are implemented then they are tested to check that they will not displace water elsewhere (for example, if land is raised to permit development on one area, compensatory flood storage will be required in another)".*

11. Conclusion

Insufficient information has been provided to demonstrate that:

- a foul sewer drainage connection is possible.
- a sustainable surface water drainage strategy can be delivered.
- whether the proposed development will increase flood risk either on or off site which would result in a detrimental impact on residential amenity and highways.

Insufficient information has been provided to give absolute reassurances the development will not result in pollution on or off site that might result in harm to human health or Hatfield Forest SSSI.

Insufficient information has been provided on the current land drainage on the site where water in Shermore Brook that flows under the Flitch Way and enters Hatfield Forest originates (the developer is stating that Shermore Brook is dry most of the year). Sources of water should be marked on a map.

Further investigation and evidence is required with the correct ‘permissions’ in place if the Developer intends to further survey private land. Evidence of relevant permissions should be appended to Planning documentation.

The level of detail and amount of information required must be proportionate to the proposal (Planning Practice Guide). This is a significant application. The drainage details are lengthy but repetitive and lacking in the required detail.
Importantly, the submission has established that the site has extremely poor infiltration due to the underlying geology. There is NO clear evidence that the development will not have a detrimental impact on drainage, flooding and ultimately the local environment including residents. (We note that BRE 365 and falling head tests were abandoned at an adjacent site because ground water was **static** (May 2025 - UTT/25/18854/FUL Cranwellian).

Appendix A

The submission includes numerous out of date base maps. This is one example