



OBJECTION TO PLANNING APPLICATION 2026/0447 from POSITIVELY HERSHAM, a sub- committee of HERSHAM COMMUNITY GROUP

This is an objection against Planning Application 2026/0447 regarding land to the South of 131 to 147 Burwood Road Hersham following further information and amendments by the Applicants. This objection is one of several objections, sent under separate cover.

This particular objection is in relation to FLOODING, SuDS AND SOIL STABILITY.

INTRODUCTION

Flooding and Soil Stability need to be considered together bearing in mind their significant connection but there is a fundamental issue that needs to be addressed at the very outset.

The Applicants have made considerable comment on how the scheme will improve surface water flooding **on site** for the benefit of existing residents and it is claimed that this is an important issue to be considered in the determination of the application.

THIS POSITION IS ENTIRELY INCORRECT. LOCAL RESIDENTS DO NOT WISH THIS SITE TO BE SUBJECT TO ANY SO CALLED REMEDIAL WORKS

The site is natural habitat and has been virtually untouched since records began, as evidenced by all parties, including the Applicants. The site, together with very large areas of adjoining land including pasture, stables, kennels, fields, cemetery and golf course is subject to surface water flooding, caused by local topography including a very high water table.

Such surface flooding is completely natural and part of the vernacular - a part of the historical fabric of the area which needs to be preserved. The natural surface water flooding is absolutely not a problem for the area and is an occurrence which is dealt with naturally by the passing of the seasons. In fact, it is no exaggeration to say that the historical nature of the seasonal surface water adds to the charm and beauty of the area.

The implication by the Applicants that any ground and surface water scheme will be a benefit to existing residents is a distortion of the narrative, is completely unfounded and is in contrast to the reality of the situation.

We have read the amended versions of the documents, published in response to objections from residents and Statutory Consultees, including the responses from LDE amended versions dated 9 July 2026.

We do not see any material changes and stand by our initial OBJECTIONS concerning ground water, surface water flooding and soil stability.

SOIL STABILITY

The site is confirmed by the Applicants' own reports to be situated on unstable geology. A self-explanatory quote from RSK Geosciences Environmental and Site Investigation, pages 27 and 28:

"The key risks identified following completion of the ground investigation are as follows:

Sudden lateral changes in ground conditions associated with the variably granular and cohesive superficial deposits of the Taplow Gravel Member and relatively shallow interface with the underlying cohesive Claygate Member;

Presence of locally low density granular deposits and soft consistency low strength silt rich cohesive soils within the superficial Taplow Gravel Member and the underlying upper horizon of the Claygate Member;

Shrinkable cohesive strata of the Taplow Gravel Member and underlying Claygate Member soils of medium volume change potential;

Silt rich soils susceptible to rapid loss of strength in wet conditions.

Presence of a very shallow groundwater table (locally present at surface at the time of investigation) that is likely to seasonally variable; and

Significant instability within the saturated granular deposits of the Taplow Gravel Member with potential for running sand conditions.”

We have collated a further summary of results from RSK data as follows:

Hole number	Nearest proposed unit	Assessed hole stability	Proposed depth of soil infill
SA02	Houses 49&50, SE of site	Unstable from 0.4m	1metre
TP04	Under road in front of house 46	Extremely unstable	1metre
TP03	Under house 39	Very unstable	1.1 metre
WS03	Under house 57	Very unstable from 0.3 to 1.9 metres	0.8 metre
SA03	Under house 14	Unstable below 0.3m	1 metre
TP05	Under SW corner of large attenuation basin	Very unstable from 0.4 to 1.8 metre	Basin proposed to be excavated 0.5 metre below existing surface

The proposals require the entire built site (excluding the public open space) to be raised by up to 1.5 metres. Adding another layer of instability appears to be entirely inappropriate, even a risk.

The explanations for raised ground appear to be:

- The attenuation tanks cannot be buried because the highest ground water level is minimally below the surface for much of the year.
- To allow attenuation tanks to be sited on, or very close to, the existing ground level, it is then necessary to build up the surrounding land upon which the units and roads will then be constructed.
- The level of the roadways/porous pavements needs to be raised, so that their underground pipework will slope northwards under gravity towards those attenuation tanks.

Given all of the above and as acknowledged by the Applicant, deeper ground investigation is necessary to confirm the actual soil profile and provide solutions to resolve instability.

This has not happened, nor has further groundwater monitoring, as is required under SuDS.

Furthermore, it is acknowledged that groundwater flow affects areas off-site as well as on the site itself. There is no evidence, as is required, that has been considered.

SURFACE WATER

The submitted documents all suggest that the water control features will prevent any surface water or ground water flooding *of the new housing units*.

However, the rules are clear that impact on adjacent properties must also be considered.

NPPF2026, F7 states: 1. Development proposals should not present a risk from flooding to potential occupiers, and **should not increase flood risk elsewhere**. And 2. Where development is proposed in a location known to be at risk from any form of flooding, now or in the future, it should be refused unless.... it can be **demonstrated** that flood risk will not be increased elsewhere.

These requirements have not been fulfilled.

With regard to discharge into the surface water sewer, for the sake of clarification, this is into the northern boundary ditch along Burwood Road.

Pumping water from the site is required because of the design, not the initial site topography. The preference is for gravity flow (SuDS Principle 1) as this is less likely to fail and is viable in perpetuity. Thames Water have stated that their system has the capacity for the additional flow of surface water. We do not know if this is based on the capacity of the existing piped sewer that starts at the eastern edge of the ditch, close to the electricity sub-station and which flows eastward. This pipe has a diameter variously described as:

- 600mm (Ref LFA and SuDS July 2026.)
- 450mm (Surrey mapping system using Thames Water data, private email 08/08/2026);

- 250mm (direct measurement of the visible end of the pipe adjacent to the electricity pumping station).

What we do know is that in August 2026, the ditch itself still contained running water above a 560mm sludge layer even after the recent 2 month drought in this location. We also know that the water level rises significantly after rain, and that the ditch itself is frequently full.

At present surface water runs from the site in all directions to the western and eastern ditches and to the lower lying land to the south. Not much flows into the northern ditch from the site. Slowly, excess water drains naturally into the ground.

The northern ditch, which runs along the south side of Burwood Road, is also the surface water sewer for the area. By intention, it takes all the excess water from Eastwick Road, Kenwood Drive, The Heronry and from the western length of Burwood Road. It is noted that the northern ditch is wet even during prolonged drought.

Under the proposals **ALL** of the surface water from the site, except the wooded area, will be collected and discharged to the northern ditch / sewer.

At the very time that the sewer will be running at its peak flow the proposals intend to add substantially more water. Rather than reducing the problem the Proposals increase the problem.

We therefore have serious doubts that the ditch/surface water sewer actually has capacity for additional storm water at this location.

The Applicant must determine the ACTUAL spare capacity of the ditch to take exceptional storm water runoff before planning approval is given, as stated in NPPF2026 F7 points 1 & 2.

This has not been fulfilled.

SuDS

With the inherent instability of the underlying gravel and sand layers, none of these proposals are satisfactory or viable in the longer term, even within the lifetime of a housing development.

The building of bunds raising the ground level is pertinent here, as we know that the neighbouring properties are vulnerable to flooding. It is not demonstrated that those steps will mitigate the problem ***outside of the site***.

With regard to attenuation tanks, it is understood that the typical life of such tanks is 30 years. But drainage systems must endure for the lifetime of the development. These tanks require to be stabilised, as tanks in this type of environment are known to “float” or otherwise drift unless well anchored. Calculations from the data provided show that the bases of all the attenuation tanks are marginally below the current ground level so will be vulnerable to ground water incursions. This is a serious risk. Please refer CIRIA SuDS Manual chapter 21.

With regard to detention basins it should be noted:

1. In the modified submitted documents, this detention basin has been considerably enlarged in area in a northward direction. It now intrudes considerably into area of flooding risk as shown on their own documents.
2. The base of this basin is 1.1m below the top of the bund, whilst simultaneously being 0.6m below existing ground level.
3. The top of the surrounding bund is surrounded by embankments going both upwards and downwards to the surrounding area.
4. According to the CIRIA SuDS Manual, paragraph 22, “*Detention Basins are landscaped depressions that are normally dry except during and immediately following storm events.*”
5. A 1.1m unfenced pit, located in the current seasonally flooded area, cannot be classed as a depression, nor is it dry. For much of the year, it would contain water, regardless of weather. Therefore the volume available within the basin to take excess storm water is likely to be much less than for a dry basin. **This defeats the very purpose of the basin.**
6. The basin is a large, dominant and deep feature of the supposedly natural retained public area. It does in fact take up approximately 25% of the Public Open Space.
7. In addition, it is worth noting that this basin is unsafe for a Public Open Space used by children, unprotected and deep, rendering it dangerous to both residents and the public users. **This is not a public benefit, as claimed.**
8. It does not pass SuDS principles or new NPPF F7.

Set out below is a table indicating non-compliance of SuDS with regard to this application.

PRINCIPLE NUMBER	TOPIC OR THEME	DETAIL OF NON-COMPLIANCE
1. Natural approach to managing water.	1.7 The runoff shall not increase the risk of flooding elsewhere from any source. 1.24. The use of pumping within surface water drainage systems shall be by exception only.	All statements refer to flooding within the boundary of the site. Neighbouring sites appear to be mainly ignored which is not compliant with NPPF F7. Risks associated with failure of system have not been mentioned, or why a pumped system is necessary for this site.
3. Management of extreme rainfall and flooding	Purpose 3 states that: the approach should mimic the natural drainage of the site. 3.1. groundwater levels should be confirmed across the site through site investigation during high ground water periods. 3.24. SuDS shall include analysis of effects on the system if the outfall is likely to be surcharged.	The SuDS area is artificially raised. It relies entirely on there never being any subsidence on the site, which Application reports state as being geologically extremely unstable. The SuDS area of the site is entirely manmade, so does not follow the natural existing profile which will drastically alter the underlying morphology of the site. The surface water strategy depends on all SuDS water flowing northwards, instead of in all directions as currently, as well as feeding to ground water. Minimal ground water measurements have been reported on one occasion, and not comprehensively for the whole site. It is known locally that the ditch to be used runs wet even in the current 2-month period of drought when it contained 56cm of soft sludge and free running water. Water level in ditch rises rapidly during and after rain, primarily from other sources other than this site, which currently runs elsewhere. Thus more surface water will be discharged, even when attenuated, at the very time that the ditch currently runs full.
4. Water Quality	Principle 4 states that: Surface water management should..... be integrated with the existing topography, hydrology... 4.4 Water quality	The SuDS part of the site is entirely manmade, so does not follow the natural existing profile which will drastically alter the underlying ground water flow. The surface water strategy depends on all SuDS water flowing northwards, instead of in all directions, as currently. Stated that contamination will be low. However, it must be emphasised that all of the built part of the site will be deeply covered with imported soil or material which must be totally non-contaminated to obtain this result. Currently, the land has been used as pasture for the last 200 years, and imported material is unlikely to be as uncontaminated as this. Runoff will also involve the drainage ditches on three sides of the site as well as to the lower lying south. Therefore 4.4 cannot be confirmed.
5. Amenity	5.1. A SuDS approach shall be adopted that maximises amenity 5.4.1. high quality visual impact. 5.8. attenuated features that maximise the opportunity for public appreciation	25% of the proposed Amenity area will be an attenuation basin which is maximum of 1m deep, and below current ground water level. It will be of limited amenity for much of the year. As it is also above existing ground level, it will not enhance any visual impact at any time.
7. Construction and design	7.18. use of pumps,... automatic monitoring and transmission of failure warning...	Pumps have a short life time compared with housing, especially compared with gravity drainage which the site currently has. Cannot be 100% reliable unless constantly monitored 24/7. Not an improvement with what the site currently has or needs.

Surrey County Council LFA

SCC LFA objected to the original application on 27 May 2026 on several grounds, including non-compliance with Principles 1 - 7 SuDS requirements and very importantly it needs to be demonstrated that flood risk does not increase elsewhere. SCC LFA have now further responded on 26 August 2026 and all their objections, particularly Principle 1 - 4 and 7 have been repeated in the form of conditions.

Principles 5 and 6 have been delegated to the relevant Consultees who have yet to respond.

The original objections by SCC LFA remain valid and are serious enough to be considered within the planning balance.

CONCLUSIONS

- Paragraph 18 of NPPF2026 states: *The Objective of the policies in this chapter is to minimise risks to development arising from all sources of flooding... taking into account the impacts of climate change, by steering development away from areas of risk, ensuring that development will be safe for its lifetime without increasing flood risk elsewhere, and incorporating sustainable drainage systems where appropriate.* It has not been shown that the development will not cause flooding elsewhere, and SuDS compliance has not been shown in all categories.
- The flooding and drainage difficulties are self-imposed by the design of the proposed development.
- The site is inherently unstable. There are no works proposed to remedy the instability, rather the proposal is to add up to 1.5m of material **on top** of the unstable land.
- Large numbers of objectors including Statutory Consultees have raised many valid concerns.
- The proposals do not improve the drainage within the immediate locality. There is no need, as the site currently exists, to introduce any drainage. It is, after all, only necessary to enable the scheme to go ahead, only for the benefit of the applicants.
- The issue of drainage has only been raised as a consequence of the scheme so it cannot be used to justify a planning application in terms of a planning gain.

The application should be refused.