Combroke Parish Council

Consultation for Application 19/00361/FUL

At: The Little House, Combrook, CV35 9HP

Proposed: Enlargement of parking area, erection of retaining wall

Representation

The Parish Council OBJECTS to this application mainly on the grounds that it will cause increased risk of harm to Heritage Assets from flooding. This risk affects the terrace, which comprises 4 Grade II listed cottages, to the south of The Little House.

There are significant anomalies between key elements of the application as submitted and as constructed. More specifically there are considerable inaccuracies within the application, submitted plans and supporting statements. The key aspects of the retrospective design submitted do not match the development as implemented.

The Little House and its land falls within the Combrook and Compton Verney Conservation Area, washed over by the Feldon Landscape Area and the proposed development is in full view from the lane which cuts through the property. It is therefore expected that the Authority's Landscape and Conservation Officers will be consulted regarding the impact of the excavation of the hillside and this proposed development on landscape, townscape and heritage. Points worthy of note are that the 1972 Conservation Area Map identifies this specific area of the village as an "area of character " and the Planning Authority's Conservation Area Study (1994) identifies the Little House and Keepers Cottage as"buildings of group and townscape value".

Particular matters of concern in the application are as follows :

1. There is no clarity about the proposed method for surface water drainage arising out of run-off from the hill side above the new retaining wall nor from the increase in surface water to be disposed of due to the loss of permeable garden land.

2. The structure of the new retaining wall and the new hard standing area are complete but are not built in accordance with the submitted drawings, or as described in the agent's supporting letter, or the letter from the structural engineer.

3. There is no Site Plan to identify the proposed development with dimensions to site boundaries or any identification of the established public rights of way crossing the site. The Location Plan is inaccurate in that it fails to include part of the garage building owned by the applicant which discharges rainwater from its roof into the development site.

4. The supporting letter from the agent states that "No protected trees have been removed to facilitate the development undertaken to date and none will be removed to allow its completion." It transpires that this is incorrect as the Tree Technical Note which accompanies this application declares that the SDC Forestry Officer has advised that 2 mature trees have had their roots so badly damaged by the excavation of the hillside that they must be removed. The Parish Council believes that had the application been made before any work commenced, the proximity of mature tree roots to the necessary excavations would have resulted in a need to revise the proposal.

Taking each of these matters in turn

1. Flooding and Drainage

The most significant impact of the proposed development is the increased flood risk to the terrace of 4 listed properties to the south of The Little House. The ground floor of these properties is approximately 1 metre below the lane. The lane itself slopes downwards towards the south and the surface water run-off from the existing tarmac parking area of approximately 250 sq m flows across the lane and then south towards an existing gully. This small circular road gully is located at the top of a flight of steps leading to the south side entrance of The Little House.

The lane at this point is an unadopted public highway and is not in the ownership of the applicant. Neither the lane nor its drainage is maintained by WCC Highways. The road gully has become blocked or overwhelmed in the past, most recently in Spring 2018 when the neighbouring Grade II listed property was flooded.

This proposal adds to the rate of surface water run-off directed towards the low lying listed properties to the south. This is contrary to SDC CS4 section B which states that "Development will not be permitted where it results in an increase in the risk of flooding elsewhere."

Approximately 70 sq m of garden land has been hard surfaced. Previously this garden land was available to soak up not only direct rainfall, but also surface water from the steep hillside above. The application form, the supporting letter from the Agent and drawing 412.42 show that the hard standing provided for additional parking was proposed to be a permeable surface. This was also the advice from the structural engineer as a way to avoid adding extra water to the drainage system ultimately feeding into the stream.

This has not been implemented as the surface is in fact concrete laid on a reinforcing steel mesh. Drawing 412.40E shows a proposal for a channel drain apparently intended to collect surface water from the impermeable surface, but no obvious connection to either a new or existing drainage system. Furthermore no channel drain has been installed at the present time despite the completion of the retaining wall except for the addition of stone facing and a concrete capping.

The retaining wall is described in the Structural Engineer's letter dated 4th December 2018 as having a land drain behind it discharging through weep holes. These weep holes are not shown on any drawing but must discharge all surface water collected behind the retaining wall either on to the new non-permeable concrete surface or the existing non permeable tarmac. The height survey data shown on drawing 412.40E indicates that all run-off must flow from the new parking area on to the existing parking area, across the lane and then south into the existing small gully at the top of the steps leading to the side entrance to The Little House.

It is noted that there are 2 new gullies shown on drawing 412.40E on the west side of the lane immediately in front of The Little House extension. The one to the south has been installed in the verge adjacent to the road surface. Since it is at a point higher than the surface of the lane to the south, it will not collect any of the additional surface water run-off from the new concrete parking area. The new gully to the north is not currently installed but its proposed location is near the corner of the building in the verge area. It is described as a "road" gully but it is not

located in the road. The ground at this point is higher than the road and slopes downwards towards the south so it does not appear that it will contribute to any surface water drainage.

This proposal therefore not only reduces the area of natural drainage, it adds to the surface water run-off but provides no means to dispose of it to a permeable area contrary to sustainable drainage (SUDS) principles. Instead it appears to rely on the increased run-off flowing across the surface of the lane (which is not in the ownership of the applicant) and being collected in a small gully which presumably leads to the stream, although the route is unknown.

It is noted that a superseded drawing 412.40D has been included with the application. This drawing shows new underground drainage pipes installed under the existing tarmac parking area together with at least one new road gulley. This would appear to be designed to collect surface water from both ends of the land drain behind the retaining wall and could have collected surface water from the new parking area with the inclusion of appropriate gradients. However it would seem that this design, which could have reduced the flow of surface water towards the low lying properties to the south, has been dismissed in favour of the less satisfactory design presented in 412.40E.

2. Retaining Wall Design

The retaining wall described by the structural engineer in their letter dated 4th December 2018 is not the same as that shown in drawing 412.42 and this is not the same as has been built.

The structural engineer's letter describes a wall formed from a 100mm wide block, 300mm wide reinforced concrete, a 440mm wide block and a natural stone facing. However drawing 412.42 shows the width of reinforced concrete, which is the main structural element, to be only 150mm thick. The engineer's letter also describes the reinforced concrete base as being 950mm wide which would accommodate the total width of wall described, but would not produce the eccentricity of the wall relative to the base or the "heel" shown in the drawing.

Drawing 412.42 shows the "permeable surface to car park" to be level with the top of the 450mm deep reinforced concrete base on which the wall is constructed. However Fig.1 (see page 4) shows the surface of the new parking area to be an estimated 300 to 350mm below the top of the concrete base. Fig. 2 shows the excavated ground for the wall and the parking area to be on the same level. In other words at this point there is no below-ground foundation for the wall and the base is built directly on the excavated level ground using shuttering. The reinforced concrete parking area has subsequently been laid to a thickness of approximately 100mm in front of the wall (Fig. 3) and this appears to provide the only means to resist the movement of the whole wall against the lateral earth pressure.

Drawing 414.42 shows the height of the wall to be 1.575m above the surface of the new parking area. However, as seen in Fig. 1, this surface is an estimated 300 to 350mm below the level shown in the drawing. In addition, the wall is shown to be constructed from 10 off 140mm deep blocks whereas Fig. 4 clearly shows 12 blocks. The wall is therefore significantly higher than shown in the submitted drawing and retains far more than the 1.6m height of garden described by the structural engineer in the first paragraph of their letter.

The wall does not appear to have been built in accordance with drawing 412.42 but in the absence of the calculations, it is not known if this is the design checked by the structural engineer.

The engineer states explicitly in their letter that "if anything is found to differ from my assumptions, it is important to inform me at the earliest possible opportunity to allow me to check my calculations remain valid." The Parish Council would wish to be reassured that the retaining wall as-built is adequately designed to withstand both collapse and movement.

The structural engineer also made specific recommendations about drainage and in particular referred to the land drain discharging through weep holes "into a road gully which is shown on your architect's drawing". The agent's supporting letter (at p4) also referred to dealing with surface water run-off blocked by the retaining wall and mentioned, "new drainage mechanisms both under the existing tarmac area and behind the retaining wall to ensure all surface water is directed under the private School Lane and via a road gully to the north of The Little House ….". Both of these references appear to relate to the superseded drawing 412.40D and not what is now proposed in 412.40E.

There is concern that if the structural engineer's drainage recommendations are not complied with, this may affect the water level behind the wall and the corresponding hydrostatic pressure acting on it.

3. Site Plan/Location Plan

The Site Plan might have been expected to show that the lane which passes The Little House to provide access to Keepers Cottage beyond is an unadopted road and is not in the ownership of the applicant. There is no clear distinction on the ground between the existing parking area and the roadway on the eastern side but the boundary is clearly seen in Land Registry documents – see appendix A.

The Location Plan excludes from the 'edged red' site part of the garage building currently owned by the applicant. It lies immediately to the south of the garaging which is shown and it can be identified on the attached land registration in Appendix A which pre-dates the extension of the garage in 2000. This is relevant because the rainwater pipe from the roof of this extensive garage building connects directly into the same small road gully that currently collects all surface water from the new and existing car parking areas. This gully appears to be the only one available at present to collect water from the land drain behind the retaining wall, although there is no clarity about how water from the land drain is discharged from behind the wall as built.

4. Trees

If this application had been made before excavation of the hillside had started, the Parish Council would have requested an amendment to the proposal. The proximity of the trees and the depth of the excavation meant that it could easily have been predicted that root damage would occur. The destruction of trees to permit a larger parking area of a particular shape could not be justified. The whole site lies within the Combrook and Compton Verney Conservation area and therefore all trees with a stem diameter greater than 75mm measured 1.5m from ground level are protected. The Tree Technical Note which accompanies the Application states that the roots of 2 substantial trees have been severed during excavation for the building of the wall and that they must be removed. The fact that one tree is in the ownership of one neighbour and the other tree is right on the boundary with the other neighbour is particularly regrettable as this action affects others more than the applicant.

Conclusion
The removal of trees and part of a hillside to create additional parking has changed the natural landscape in an area that was supposed to be protected by its Conservation Area status.

The Parish Council objects to this largely retrospective application on the grounds that the proposal does not match what has already been constructed and neither the proposal nor what has been constructed has been demonstrated to be adequate.

Neither the development as built, nor the proposed drawings accurately reflect the descriptions for the development in the retrospective Report of the structural Engineer. There is no demonstrable evidence that the constructed development is structurally sound with adequate drainage.

The drainage for any development on this site must ensure there is no increased risk of surface water flooding to the lower lying Grade II Listed buildings immediately beyond the south of the site. This proposal fails to show how this will be averted.

18 April 2019