Please reply to: coordination@guildfordresidents.co.uk
14 March 2022

SCC planning application **2021/0209**
GBC planning consultation **22/CON/00006**

Dear Sir or Madam

Location: *Land to the east of Slyfield Industrial Estate, Moorfield Road, Guildford, GU1 1RR*

Proposal: *Application to Surrey CC/Consultation from Surrey CC by GBC for the Construction and operation of a new sewage treatment works and associated above and below ground infrastructure, including new final effluent and storm water outfall, and new transfer tunnel.*

Guildford Residents Association, an organisation of about 30 residents associations and parish councils, comments as follows:

We support the principle of this enabling development but reserve our position at this stage in the absence of satisfactory resolution of the following issues.

1) In recent times, Thames Water's record of discharging untreated and inadequately treated sewage and wastewater into the Wey has been nothing short of appalling. This is not a description we use lightly. In view of this, the plans for future discharges and the rigour of controlling releases to the environment during construction need to be much tighter. There is a very lax approach to discharges and to monitoring which needs to change. The stench of the outfall on a regular basis in recent times, and all that this indicates, should be a source of shame.

2) Communication with the community to explain the proposals for a new Sewage Treatment Works and associated clear up and infrastructure have been wholly inadequate, especially in view of the fact this development is being funded by the residents and businesses of Guildford. Public meetings should be set up as a priority to enable people to understand and help to shape the scheme.

3) This will be a large, obtrusive structure that will be a defining feature of the landscape approaching Guildford from the A3, from Green Belt, from the designated Wey Navigation and from the Nature Reserve. The landscape assessment is inadequate. In the minimal photo montages, buildings have been shown as hazy in a way which is inconsistent with how the

surface materials of buildings are perceived as solid, flat constructs, in contrast to the softness of natural features such as tree silhouettes. Light reflects differently on buildings and trees and the photomontages are deceptive. The assessment does not consider impact on views from the Surrey Hills AONB along Merrow Downs. Additionally, the scheme should be presented in VuCity.

4) The colour, texture and roofing of buildings and structures, as well as their size and form, need to be given more thought in this prominent, edge of settlement and riverside floodplain setting. This includes colour and roof treatment to reduce impact from the AONB.

5) The proposed buffer along the Wey Corridor would be inadequate. Soft green edges to development and settlements are an important characteristic feature of Guildford. The proposed tree screen is insufficient to be effective to screen views from Green Belt approaches to Guildford, from the Wey, from a listed building and from a nature reserve and amenity area. The impact and design of fencing and of the areas cleared of vegetation around the perimeter security fencing need to be given more thought. The design is too utilitarian.

6) The proposed transfer tunnel is far too close to the Wey. It breaches the 10m strip that should be free from development. The numerous boring and inspection access points along the route should be set back further, and at least 10m without exception, to provide an uninterrupted landscape buffer along the Wey corridor. A tunnel route so close to the Wey would affect flows of water close to the channel disrupting groundwater flows and displacing floodplain capacity. The tunnel route so close to the river would also affect the scope for mature trees to thrive, impeding the establishment of an effective buffer. Reference is made to land that could potentially be used to expand the capacity of the sewage works in future. With the proposed connector tunnel route so close to the river, there would be no scope to increase the capacity of the connecting sewer pipe without causing even more unacceptable harm to the riverside.

7) The lighting plan does not give enough consideration to impact on the wildlife and landscape of the Wey Corridor Conservation Area, the adjoining Green Belt countryside or nature reserve and how harm would be avoided and mitigated. Proposing that there would be a lighting condition is insufficient unless it can be demonstrated that light impact can be reduced to an acceptable level and that landscaping will be sufficient to minimise light pollution to an acceptable degree. This is a sensitive location. A perimeter strip cleared of vegetation would exacerbate light pollution. Appropriate movement-activated lighting should be considered to minimise unnecessary illumination.

8) The control of pollution during construction and remediation is a concern, especially in view of the riverside location and movement of water through the site to the Wey and its floodplain.

   The application relates to contamination associated with the existing Sewage Treatment Works, the former sludge lagoons and former landfill, which present different types and levels of contamination. It is significant that the landfill, established in the 1960s, was uncontrolled, took industrial, commercial, household and inert wastes and was formed partly on an old gravel extraction site and partly over a sludge lagoon. It is unlined so it disperses contaminants into the surrounding areas, has a capping of variable thickness and materials, and has had a gas barrier with vents added by the industrial estate. Due to the nature of the landfill the material and composition encountered varies significantly. The sludge lagoon has a high organic matter as

well as metal and ash. The interplay between ground gas and groundwater levels also needs to be appreciated and taken into account in assessing risk.

Much reliance is being placed on planning conditions and further testing. In view of the variability across the site, in addition to sampling, best practice live inspection and testing will be required during works. Residents consider it will be essential to ensure the highest standards of testing (including vapour and leachate) and compliance are enforced, and trust there will be a permanent presence on site with the expertise, authority and independence to monitor and enforce.

9) Groundwater and river water quality monitoring will be required. The area falls within a Source Protection Zone for public drinking water supply. There is a license for groundwater abstraction close to the site. Water connects between the gravel aquifer and the River Wey acting as a pathway for contamination. The Wey is already classified as a "failing" water body under the Water Framework Directive due to its chemical status. The potential for mobilisation of existing onsite contaminants is a concern. For example, the Environment Agency is concerned about release of ammonia to the Wey during construction and due to disturbance. Geo-environmental report results showed some exceedances of Drinking Water Standards within groundwater samples collected from the gravel aquifer. The soil leachate and groundwater results showed elevated concentrations of ammoniacal nitrogen. Further surface water monitoring and sampling should be undertaken to investigate and assess the longer-term water chemistry of the River Wey, both upstream and downstream of the Site.

10) We consider it is essential for the interplay between types of flood risk, and with pollution, to be factored into the design and development of this site. It is challenging to interpret the mix of flood risk and water borne contamination sources. The natural flood plain has been disrupted by the landfill being capped off above natural ground level disguising the extent of saturation below the surface. Flooding in the centre of the overall site (eg 2000, 2003) is from lagoons that took overflow from the sewage treatment works. These would be remediated as part of this relocation. Polluter should pay. A former river ran to the north of the site. This was infilled in the 1920s with the likely effect that diverted flows still arise below the surface.

The site is underlain by gravels which sit on London Clay. Groundwater collects in the clay basin and permeates the gravel and lies very close to the surface. Groundwater flows through the gravels carrying pollutants from the application site throughout the floodplain. The Environment Agency confirms groundwater monitoring has detected high levels of ammonia within Slyfield Meadow and Riverside Park Site of Nature Conservation Importance (part of Riverside Local Nature Reserve) and Burpham Court Farm. This contamination is likely to be associated with the adjacent landfill and is at concentrations toxic to aquatic life. The Wey is a "failing" water body. The construction and compaction phase of the proposed development could mobilise contamination which would be dispersed by ground water, including to the River Wey and its associated wetland features. An approach of avoidance and mitigation, including a well-designed buffer strip, is required.

While flood risk from the river is an issue in specific parts of the overall site, groundwater flood risk is widespread. During ground investigation, the exploratory holes found groundwater flow and seepage at ground level. The site has potential for groundwater flooding below ground level and at the surface with the associated risk of sewer flooding. Groundwater flooding tends to be

a longer-term issue than other potentially shorter duration flood events. Sustained resilience, that is effective over protracted periods of high water levels, is required in the design of this development and the way it functions as part of a wider system. The Sewer Record Flood Map indicates that the Site is located within a postcode area which has 23 recorded sewer flooding incidences from internal and external sources. The default position of assuming discharge of exceedances to the Wey is not acceptable, especially in view of the way this approach has been abused in recent times. The design capacity should be such that discharge of raw or inadequately treated wastewater from the storm water outfall is an extremely rare event. That is not the current operating model. Assurances are needed on design capacity in relation to

- need and demand for foul water and sewage treatment,
- growing frequency of high magnitude rainfall events associated with climate change, and
- the adequacy of a sequence of mitigation practices that reduce the need for stormwater discharges of inadequately treated overflow discharges to very rare and truly exceptional circumstances.

This will require culture change and scrutiny of costings. This would be wholly appropriate for a community funded scheme.

11) Soakaways are not recommended in the area of landfill due to the potential to drive leachates towards the river. A clear, enforced drainage management strategy, with a series of treatment options to reduce risk of pollution to groundwater, and an accompanying risk assessment, are required.

12) The issue of land stability should not be underestimated. The assessments confirm that this will be a major issue. The Made Ground is highly variable and presents construction challenges. Water is near the surface. Major investment will be required to prevent significant total and differential settlement. Extensive removal and replacement, or compaction of soft material will be required. The undulating surface at the Moorfield Road end of Westfield Road is an impressive reminder of what happens when the preparatory works are inadequate, and the construction method lacks the resilience required. Cracking of infrastructure on former landfill sites occurs, including of incinerators.

13) Assurances are sought that best practices will be applied in minimising pollution and other impacts from vehicles during construction and operation. Further, assurances are sought that use of this facility will be confined to treatment of local sewage and wastewater.

14) Has consent for the works and outfall been obtained from the National Trust which holds the Wey Navigation inalienably?

We trust that you will take these comments into consideration.

Yours sincerely

AJM

On behalf of the GRA Coordination Group