

Thank you for forwarding the latest information relating to the surface water drainage proposals at this site.

Having reviewed the information, we maintain our holding objection for the following reasons:

- The infiltration rate calculated in GE20814/WP02/220518 is accompanied by a disclaimer stating that testing by other methods in equivalent ground conditions did not achieve suitable results, showing that the rate of infiltration at this location is not uniform or consistent. The rate itself is described as estimated and preliminary in the report.
- It is stated that storage is available in the wider system for several 1 in 10 year events. This should not be necessary and suggests that there may be a problem with the design.
- As the boreholes are surcharged for much of the effective depth, the method of modelling them in Micro Drainage (essentially stacking them above each other) does not seem to be an appropriate method. The modelling should possibly take account of the number of boreholes and the surface area of the cross sections, as this may be the only interface for the surface water when groundwater levels are at their highest.
- It is not clear how the driving head or presence of groundwater is modelled in the calculations. As stated above, it is anticipated that infiltration rates are not a constant variable, and that the full capacity of the boreholes will not be available for storage.
- It is not clear whether a falling head test into saturated chalk can effectively demonstrate the effect of the design storm draining to saturated chalk, because of the significant difference in water volume.
- There is a risk that the effectiveness of the proposed deep bore soakaways may only be proven after they have been completed, which may result in additional deep bore soakaways being required after completion.
- The EA's approval relates to the principle of discharging surface water of an appropriate quality to the aquifer, rather than the effectiveness of the design for disposing of surface water for the design storm. In separate correspondence between ourselves and the EA, they have questioned the value of the additional capacity provided by boreholes in saturated ground.

We would really appreciate clarification on these points, as we are still not confident that the proposals will be suitable.

Regards

Tom Callaway