



Land South of Barrow Green Road, Oxted

PINS Ref: APP/M3645/W/25/3372747

**Drainage Rebuttal to Dr Harvey Rodda Proof
of Evidence**

**Prepared by
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For

Croudace Homes Limited

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1.0 Introduction

- 1.1 This Drainage Rebuttal Proof of Evidence has been prepared in response to the Proof of Evidence prepared by Dr Harvey J E Rodda of Hydro-GIS Ltd (CD7.6) and should be read along side the Hydrology Rebuttal Proof of Evidence prepared by Mr Brian Cafferkey.
- 1.2 This rebuttal focuses on specific elements of Dr Rodda's Proof of Evidence as summarised below:
- ▶ Groundwater monitoring data;
 - ▶ Clarification of Motion document references;
 - ▶ Water quality; and
 - ▶ Water balance calculation for onsite attenuation.
- 1.3 The lack of comment on other matters should not be taken as agreement.

2.0 Groundwater Data

- 2.1 In Dr Rodda's evidence at paragraph 7.2 he states the following:
- "no proper monitoring of groundwater levels in boreholes was undertaken over a period of time and no records of the depth and geology were presented from these wells. The only information on the underlying geology was from four trial pits excavated to a depth of 2m, shown in Appendix D (Trial Hole Logs) of the FRA. If boreholes have also been sunk at the site for monitoring groundwater then similar logs should appear for the boreholes."*
- 2.2 This statement is incorrect. In addition to the four trial pits, eight boreholes were located in the vicinity of the spring area. Groundwater monitoring was undertaken within two boreholes via dataloggers during December 2024 and January 2025. As discussed at paragraph 4.16 of the Flood Risk Assessment and Drainage Strategy (FRA) (CD1.22.U), an additional eight trial pits were also excavated in close proximity to the spring area.
- 2.3 A copy of the monitoring, borehole logs and trial pit logs were included in Appendix D of the original FRA (CD1.22.U). Also, the locations of the eight boreholes are also shown on the Drainage Strategy drawing contained within Appendix H of the original FRA (CD1.22.U).
- 2.4 Further groundwater monitoring was not carried out at the time, because this is an outline planning application. However, further monitoring will be carried out as part of the detailed design at the Reserved Matters stage. The Lead Local Flood Authority (LLFA) has agreed this approach, and this requirement can be adequately controlled by condition.
- 2.5 Also, in paragraph 8.2 of Dr Rodda's evidence, he states the following:
- "no information was presented on the exact location of these, or the geological logs and no proper programme of monitoring was reported on within the technical note."*
- 2.6 As stated in paragraph 2.2 above, this information was provided in Appendix D of the original FRA (CD1.22.U).

3.0 Document References

- 3.1 Paragraph 7.1 of Dr Rodda's evidence has referenced Technical Notes prepared by Motion, however some of the dates or titles are incorrect and therefore, for clarity I have summarised the correct references below:
- ▶ Flood Risk Assessment and Drainage Strategy (FRA) – Final revision C – Dated February 2025 (CD1.22.U)
 - ▶ Technical Note 1 should be Technical Note 2: Resolving LLFA Objection – Dated July 2024 (CD2.13)
 - ▶ Technical Note 2 should be Appeal Technical Note 3: Flood Risk Assessment and Surface Water Drainage Strategy – Dated October 2025 (CD2.14)
- 3.2 Also, Section 8.0 of Dr Rodda's evidence references Technical Note 2, however I believe this should be referencing Appeal Technical Note 3 (CD2.14).

4.0 Water Quality

- 4.1 In Paragraph 7.3 of Dr Rodda's evidence he states that the Flood Risk Assessment (FRA) did not include any sampling and analysis of the water quality from either the stream, groundwater, or surface water in The Bogs. In my opinion, sampling is not necessary when assessing the potential pollution risk from a new development, because there is a standard planning practice to deal with this issue.
- 4.2 The water quality of the surface water leaving the site was considered in Section 9.0 of the original FRA (CD1.22.U) and it ensures that the development site will not impact receiving waters (or groundwater, where infiltration is proposed). The currently-mandated practice is to demonstrate that pollutants associated with the runoff from the proposed site are adequately controlled through appropriate Sustainable Drainage Systems (SuDS) measures. Chapter 26 of The SuDS Manual (CD5.3) sets out the pollution hazard indices for different land use classifications and then provides SuDS mitigation indices for various SuDS components. The mitigation indices of the SuDS features must match or exceed the pollution hazard indices and, if this is achieved, then the expected pollution hazards are considered to have been mitigated.
- 4.3 This is covered in Section 9.0 of the original FRA (CD1.22.U) and this assessment was accepted by the LLFA. A further assessment will be undertaken as part of the detailed design stage, which can be controlled via condition and submitted as part of the Reserved Matters application.

5.0 Water Balance

- 5.1 Dr Rodda confirms in Paragraph 8.4 that a water balance calculation is not required if the ponds are not designed to permanently retain water, but states drawings are required to confirm this. He then states that the drawing in Appendix B of Technical Note 1 (correct reference Technical Note 2: Resolving LLFA Objection) (CD2.13, Appendix B, Page 16-17 of the PDF) could be issued as a freestanding drawing, presumably to address this point. However, this is not required as the drawing is included in the documents submitted to support the planning application, and this is available on the planning portal and in the core documents. Ultimately, this drawing will be superseded by the detailed design drawings, which will be submitted to discharge the LLFA proposed conditions.