

c/o Royal British Legion Club
Rykneld Street
Alrewas
Staffordshire
DE13 7AX

1 July 2021

Alrewas Parish Council

Chairman of the Council: Councillor Dave Whatton

Mrs Karen Tate
LDC Planning

BY E MAIL

Dear Karen,

Planning Application 20/00359/FULM - Variation of conditions 2 (Approved Plans), 6 (Drainage) and 13 (Landscaping) of permission 18/01491/FULM relating to plot substitution of 52 of the approved 121 dwellings, updated landscaping and drainage schemes - Land North Of Dark Lane Alrewas Burton Upon Trent Staffordshire

Following our recent Zoom meeting, I am writing on behalf of Alrewas Parish Council in response to the consultation on the above planning application.

As you are aware, a couple of residents of Alrewas have been commenting regularly on the Crest Nicholson plans as they have prior professional expertise in drainage. Mr Walton has produced the attached report (see appendix A to this letter). This has been circulated to Parish and District Cllrs and the majority have endorsed the report. We are therefore submitting it as an objection to the latest Crest Nicholson proposal as we believe that there remain outstanding concerns about drainage from the site. As Cllr Wilcox mentioned in our Zoom meeting, our concern is not so much for the new houses on the Crest Nicholson site, as they are elevated, but rather the impact of flooding on properties in the rest of the village if this proposed drainage system fails.

Yours sincerely,

Kathryn Powell

Kathryn Powell

Clerk to Alrewas Parish Council

Appendix A

Green Acres @ Alrewas

Planning Application 20/00359/FULM - Variation of conditions 2 (Approved Plans), 6 (Drainage) and 13 (Landscaping) of permission 18/01491/FULM relating to plot substitution of 52 of the approved 121 dwellings, updated landscaping and drainage schemes - Land North Of Dark Lane Alrewas Burton Upon Trent Staffordshire

Report to:

Lichfield District Council Planning Services

Regarding:

Consolidation of the concerns of the Alrewas Villagers:

Part A – Flood Risk Assessment & Drainage Strategy

Part B – Biodiversity and Boundary Treatment

Dated: **30 June 2021**

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1. Introduction:

Planning Application 20/00359/FULM was submitted on 04 March 2020 and over the intervening period has evolved from the initial variations to significantly wider issues. The submissions posted in the public domain on the LDC Planning Portal have been reviewed by the Councillors and the Villagers, to varying degrees, and this has resulted in some eighty Objections being posted. In addition, it is noted that many Consultees are withholding approval due to missing and/or inadequate information.

This situation has caused consternation within the Village and to address this, a Zoom Meeting was convened with LDC Planning Services on 22 June 2021, attended by Karen Tate & Kerry Challoner (LDC Planning Services), Mike Wilcox (LDC & APC Councillor), Jane Reilly (APC Vice Chair), John Pegg (APC Councillor), Kathryn Powell, Parish Clerk and John Walton (local resident).

As stated above, with the volume of Objections, it was perceived that the concerns of the Villagers may not be reaching all relevant interested parties and as such, may result in a detrimental outcome for the Village.

This was appreciated by LDC Planning Services, who agreed to ensure that this situation be addressed, but requested a consolidation of the Objections into a more manageable report. This Report is separated into two parts to assist the onward distribution to the differing consultees. The format is to firstly set out background/narrative and then to pose Questions. The Report content captures the Objections raised and in particular incorporates technical content from Trefor Milns and John Walton, both retired Civil Engineers. This Report should be read in conjunction with the greater detail contained within posted Objections.

2. Overview of concerns:

The overall concerns of the Village can be summarised as follows:

- A. Objections from the Village may not have been processed in a manner that ensures all relevant interested parties are aware of, and are accounting for, the Village views.
- B. The Surface Water Sewers may not have been designed such that when the River Trent is in flood (up to and including the 1 in 100 year flood event plus 20% for Climate Change) and the non-return valve just north of Manhole SWS 17 is closed, the rainfall events that occur (including 1 in 100 year rainfall events plus 30% for Climate Change) can be accommodated. If such a deficiency exists, this could result in surface water flooding the existing properties to the south of the development.
- C. The critical crossing point of the Drainage Ditch and the NTS 900mms diameter Gas Pipeline is not the subject (in the public domain) of comment and/or approval by National Grid Gas Transmission plc and/or Cadent Gas Limited.
- D. There are viable alternatives that are less intrusive than the current proposal to outfall the Surface Water Sewers at "The Beach".
- E. Floodplain compensation areas appear to be susceptible to not meeting design requirement.
- F. The Village is concerned that the normal protection (for perpetuity) availed by the statutory powers within the formal adoption processes by the Drainage Authority and the Highway Authority will not exist on this site for all roads, paved areas and surface water sewers, and hence the potential for flooding may be enhanced.
- G. The impact on biodiversity by the development is currently in a net loss situation. It is unclear how this will be changed into a net gain.
- H. The impact of the development on the Alrewas Footpath 51, Dark Lane northern hedge is unclear, as there appears to be confusion over what drawings have been approved. This also impacts on emergency vehicular access to properties in Dark Lane.

3. Inter-relationships:

Parts A & B below are not all applicable to all interested parties, but their individual responses may impact on one another. e.g. Design parameters for the Surface Water Sewers are primarily an issue for Severn Trent Water, Staffordshire County Council Lead Local Flood Authority, Environment Agency and the Canal & Rivers Authority, but functionality of the implemented works will be partly dependent on maintenance of the roads and paved areas which will be the remit of Staffordshire County Council Highways (if adopted) or the Estates Management Agents (if not adopted). With so many interested parties being involved, it is a concern to the Villagers that a holistic approach may be difficult to achieve, but hopefully this Report will assist in resolving this.

Question:

- a) Can it be respectfully requested that these inter-relationships are suitably and sufficiently addressed?

PART A - FLOOD RISK ASSESSMENT & DRAINAGE STRATEGY

4. Groundwater Infiltration into the Surface Water Sewers System:

The original site investigation was carried out by Ian Farmer Associates on behalf of Atkins Ltd on behalf of Lioncourt Homes, on 24 July 2013. This followed a prolonged hot dry period. Unsurprisingly, groundwater was not encountered in the four Trial Holes that were dug and hence was not accounted for in the ensuing drainage calculations incorporated into the Flood Risk Assessment & Drainage Strategy (FRA&DS) presented to the Public Inquiry.

(NB Met Office - Past Weather Events - Records extract - Hot dry spell July 2013 "From 3 to 23 July 2013 the UK experienced a spell of hot, sunny weather with an area of high pressure established across the UK.")

<https://www.metoffice.gov.uk/weather/learn-about/past-uk-weather-events#y2013>

The pathway for groundwater to enter the Surface Water Sewers, from the Atkins Ltd proposal for an Infiltration Basin to the west of the development, was consequently not accounted for.

Underlying the site are sand and gravel deposits which will allow groundwater to move towards the River Trent under normal conditions and away from the River Trent under flood conditions.

(Please note that on the nearby CEMEX site, this groundwater movement (hydraulic conductivity) has been estimated at 17 to 553 metres per day and the mean adopted is 69 metres per day.)

Crest Nicholson compounded this effect by introducing an Infiltration Blanket to the east of the development. The Infiltration Blanket has been constructed, wholly below the River Trent 1 in 100 year flood level of 53.4m AOD.

This close relationship between the River Trent flood water level and the groundwater level has been validated by observations of Severn Trent Water works (including well-point dewatering) in connecting the Green Acres Foul Water Sewer to the Dark Lane Pumping Station, water levels in the completed section of the Drainage Ditch, water levels in the Infiltration Basin in January 2021 (Storm Christoph), water infiltration into the garage pit of 4 Park Road, and anecdotally many Villagers have encountered groundwater at high level when having building works carried out.

This argument is reinforced by the comments of the SCC LLFA on the LDC Planning portal and indeed, the Hydrogeological Assessment by Enzygo Ltd for Crest Nicholson posted on the LDC Planning portal on 05 March 2021.

The situation has been further compounded/complicated by the introduction by Crest Nicholson of 5 Cellular Storage Crates in the rear gardens of Plots 50 to 54. All have a fully perforated collector pipe and all have top levels below the River Trent 1 in 100 year flood level of 53.4m AOD.

Questions:

- a) Is the Infiltration Blanket (top level of 53.15m AOD), in the east of the site, to be dug up and replaced by a sealed storage system, and if so, when? (Hydrogeological Assessment refers.)
- b) The Infiltration Blanket has been removed from Drawing Number P18-336:05 C10 Is it to be blanked off to prevent groundwater infiltration to the Surface Water Sewers, and if so, why is this not stated on the Drawing so that Planning Approval and Enforcement can be exercised?
- c) Is the Infiltration Basin (base level 52.41m AOD), to the west of the site, to be lined to prevent groundwater infiltration to the Surface Water Sewers, and if so, when? (Hydrogeological Assessment refers.) Refer to Drawing Number P18-336:01 C7.
- d) Are the five buried "Geocellular Storage Crate" installations (in rear gardens of Plots 50 to 54) (top level between 53.35 and 53.25m AOD) to be sealed to prevent groundwater infiltration to the Surface Water Sewers, in particular via the fully perforated collector pipe?
- e) Has the potential for rising groundwater to enter the SWS system (by back-feeding through the numerous soakaways) been accounted for in the Developer's submissions?

5. Storage capacity of the Surface Water Sewer System:

It is argued that in times of River Trent flooding, groundwater will move across the site (under hydraulic pressure), through the sand and gravel deposits and will enter the SWS System via any "open ends". If the Infiltration Basin in the west, the Infiltration Blanket in the east, and the five Geocellular Storage Crates are not sealed to prevent groundwater infiltration then storage capacity of the Surface Water Sewer system will be reduced or even eliminated.

Using Storms Ciara and Dennis (February 2020) as examples, it is realistic to assume that the entire SWS System will be filled with River Trent flood water / groundwater during such flooding events if groundwater infiltration is not prevented.

Hence, when rainfall events (including severe events) simultaneously occur at the site, there will be reduced or no capacity in the SWS System to accommodate the rainfall. Accordingly, no amount of MicroDrainage calculations can prove the SWS System to be working and suitable when there is no capacity in the pipework and no flow within, or out of, the system. This could result in localised flooding on the development and the adjacent existing properties in Dark Lane, Selwyn Close and Micklehome Drive.

Questions:

- a) Has the Developer calculated and stated how long it is anticipated that the non-return (flap) valve (on the outfall just north of Manhole SWS 17) will be closed during periods when the River Trent is in flood, up to and including the 1 in 100 year flood event? If so, what is this duration? If not, how is the capacity of the SWS System to be accounted for?
- b) Has the Developer calculated the volume of rainfall (up to and including the 1 in 100 years plus 30% for Climate Change rainfall events) that is anticipated during this period of non-return valve closure? If so, what is the volume? If not, how can calculations on the SWS System capability be carried out?
- c) Has the Developer calculated the volumetric capacity of the SWS System? If so, what is the volume? If not, how can it be ascertained if the SWS System is capable of accommodating the volume of rainfall?
- d) Has the Developer accounted for the maximum storage level in the SWS System being 53.196m AOD, i.e. the road level at the gullies adjacent to the bell-mouth access to Micklehome Drive? If not, how is water storage in the SWS System going to rise above this level or is it going to discharge into Micklehome Drive?
- e) Has the Developer calculated the volume of this rainfall that is designed to flow out of the SWS system via soakaways? (Assuming that the soakaways are suitably maintained - See comments on Maintenance of Roads, Paved Areas and Surface Water Sewers below.) If so, what is the volume? If not, how can calculations on the SWS System capability be carried out?
- f) Has the Developer satisfied the LDC Planning Services and SCC Lead Local Flood Authority (LLFA) that any rainfall event(s) that cannot be accommodated by the above means, will flow across the site surface to the north, not the south? Can these arrangements be described? Has this been modelled and if so, on which drawings are the levels shown?
- g) MicroDrainage calculations have been posted on the LDC Planning portal but it is unclear why this software is being used for the scenarios when there is no flow in the SWS System and no discharge due to the non-return valve being closed. Can this be explained? This is of particular concern for the MicroDrainage calculations posted on 08 June 2021 (dated 21 November 2018, as were the previous calculations posted on 13 October 2020) as they appear to show flows in the Drainage Ditch, which cannot be so if the non-return valve is closed by River Trent flood water levels. Can this be explained?

6. Drainage Ditch crossing of the NTS 900 mms diameter Gas Pipeline:

It is noted that The Health & Safety Executive has been consulted by Lichfield District Council (31 March 2020) and it was identified that the development falls within the "Consultation Distance of Major Hazard Sites/ pipelines", i.e. the Gas Pipeline. This consultation questioned "How many dwelling units are there (that lie

partly or wholly within a consultation distance)?” and was answered “3 to 30 inclusive.” (i.e. only the Outer Zone Type was applicable.) On the basis of this, the HSE stated: “HSE’s Advice: Do Not Advise Against, consequently, HSE does not advise, on safety grounds, against the granting of planning permission in this case.”

Questions:

- a) Can it be clarified if the HSE have to be consulted about the works proposed at the crossing point of the Drainage Ditch and the Major Hazard Gas Pipeline?
- b) If consultation is required, by whom?
- c) If consultation is required, has it been carried out and what was the outcome?

There are three alignments referred to below that the Surface Water Outfall takes from the boundary of the developed land to the River Trent. These are clarified as follows:

“The Lioncourt Approved Alignment”

The proposal by Lioncourt Homes / Atkins Ltd for the Drainage Ditch from the development to the River Trent, was to head north for some 100m and then connect into an existing drainage ditch, head east and then north to outfall into the River Trent. (Refer to Drawing Number 5117802/006 Rev C.) The latter 200m approximately follow a hedgerow which is the ownership boundary. To the east of this hedgerow is cultivated farm land. Total length – some 375m.

“The Crest Nicholson Approved Alignment”

Following Planning Approval 18/01492/FULM, Crest Nicholson proposed a completely new Drainage Ditch from the development to the River Trent, generally following the route proposed by “The Lioncourt Approved Alignment” but to the west of the hedgerow. Total length – some 375m. (Refer to Drawing Number P18-336:07 T6)

This alignment used an Invert Level at the development boundary of 51.47m AOD and an outfall Invert Level to the River Trent of 51.1m AOD. This gives an overall gradient of 1 in 1,013 i.e. virtually flat and almost impossible to construct precisely.

Prior to April 2020 (potentially in the summer of 2019), a Trial Hole was dug on “The Crest Nicholson Approved Alignment” where it crosses the National Grid NTS 900mms diameter High Pressure Gas Pipeline. (It is presumed that both National Grid Gas Transmission plc and the developer were represented and that both are aware of the results.) Based on the markings on the pegs still in the ground, it is estimated that the crown of the Gas Pipeline would be 51.230m AOD.

On 01 June 2020 Crest Nicholson carried out a non-intrusive Geophysical Survey of the Gas Pipeline and based on the red spray paint markings on the ground of 1.6m it is estimated that the crown of the Gas Pipeline would be 51.000m AOD.

NB Accordingly, there is a potential for the Geophysical Survey to record the crown of the Gas Pipeline to be 230mms lower than that established by the physical Trial Hole.

(See comments below regarding the clearance stated on Drawing Number P18-336:131)

Nonetheless, this was sufficient to ascertain that crossing the Gas Pipeline on “The Crest Nicholson Approved Alignment” would not be possible and hence in July 2020 a revised alignment was proposed by Crest Nicholson.

“The Crest Nicholson UNAPPROVED Alignment”

This alignment heads north for some 100m, then heads north west, crosses the Gas Pipeline and then heads north east to outfall into the River Trent at “The Beach”. Total length – some 300m (Refer to Drawing Number P18-336:07 C6.)

This alignment uses an Invert Level at the development boundary of 51.260m AOD (it is unclear why this is different to “The Crest Nicholson Approved Alignment” level of 51.470m AOD) and an outfall Invert Level to the River Trent of 51.230m AOD. This gives an overall gradient of 1 in 10,000 i.e. flat and impossible to construct precisely.

At the crossing of the Gas Pipeline, the crown level is stated on Drawing Number P18-336:131 as 50.860m AOD. This gives a clearance of 200mms to the bottom of the Drainage Ditch (piped section) excavation. However, should the potential inaccuracy identified above (Geophysical Survey to Trial Hole estimated levels) be applicable at this location, then there will be no clearance between the Gas Pipeline and the bottom of the Drainage Ditch (piped section) excavation.

It is of some concern that following the Geophysical Survey by Crest Nicholson in June 2020, three crossing details on “The Crest Nicholson UNAPPROVED Alignment” have been posted, namely:

- i) July 2020 – Drawing Number P18-336 SK40 showing Drainage Ditch (piped section) passing over the Gas Pipeline.
- ii) October 2020 – Drawing Number P18-336 SK49 showing the Drainage Ditch (piped section) having to go under the Gas Pipeline in an inverted siphon arrangement.
- iii) April 2021 – Drawing Number P18-336 SK131 showing the Drainage Ditch (piped section) passing over the Gas Pipeline.

This gives a degree of uncertainty as to the precise location of the Gas Pipeline and the associated details regarding the crossing of it.

Questions:

a) What correlation was identified, for the crown level of the Gas Pipeline, between the Trial Hole and the Geophysical Survey on the “The Crest Nicholson Approved Alignment”?

b) Prior to consideration of the proposed Gas Pipeline crossing, it is imperative that the precise level of the crown of the Gas Pipeline is ascertained by a physical

Trial Hole. Is this going to be carried out, as the whole nature, extent and alignment (vertical and horizontal) of the Drainage Ditch from the development to the River Trent is dependent on the detail of this crossing point? If not, how is the crown level being determined?

- c) Reference is made by Crest Nicholson to “Technical approval has been granted by National Grid allowing a crossing over the gas main in the proposed location with legal agreements finalising the easements.” This information is not in the public domain. Can this be posted on the LDC Planning portal?

7. Outfall of the Surface Water Sewer System to the River Trent:

The following was posted by Crest Nicholson on 23 June 2021 under the “Description”:

“Supporting drainage justification relating to 'the beach'.

“The depression within the river bank allows additional buffer for the river level to rise before surcharging the drainage outfall, unfortunately the other locations along the river bank suggested by residents do not have this benefit and thus would be more likely to encourage flooding of the system.

The culvert pipe underneath the Public right of way has had to be laid at a minimum grade to allow for drainage. The ground levels, bank levels and recorded river levels means Crest Nicholson need to have the outfall in the proposed location for the storm drainage system to work as designed protecting the green acres development and wider village from disruption and improving the historical flooding issues within the village.”

Questions:

- a) Would it be possible to explain these comments further? Currently, it is unclear what points are being made and the data that underpins them appears to be questionable.
- b) There does not appear to be any hydraulic/technical differences between “The Crest Nicholson UNAPPROVED Alignment” (i.e. outfall at “The Beach”) and that proposed by the Villagers (outfall to the River Trent some 75m east of “The Beach”). The only obvious difference is the cost of constructing the outfall to the River Trent, when river water has to be accounted for (cofferdam or similar). This is common to “The Crest Nicholson Approved Alignment” and that proposed by the Villagers. The less expensive option to outfall at “The Beach” has numerous disadvantages, as set out below. Clarification requested?

It is accepted that “The Lioncourt Approved Alignment” had issues with levels, the Gas Pipeline crossing and possibly access rights to carry out the ditch regrading on an adjacent land owner’s property.

It is also understood that “The Crest Nicholson Approved Alignment” can be built but would be expensive due to the likelihood that the Gas Pipeline crossing would need to be an inverted siphon.

“The Crest Nicholson UNAPPROVED Alignment” is considered unacceptable by the Villagers due to the following impacts on “The Beach”:

- i. The reinforced concrete headwall and galvanised steel guardrails will be a visual intrusion which in addition, may cause localised turbulence and scour of The Beach.
- ii. Scour of the channel perpendicular to river flow (i.e. caused by the surface water discharging into the River Trent) will result in turbulent river flow & eddies causing erosion of The Beach.
- iii. This is a hydraulically sensitive shallows area that is the only shallow water in Alrewas for a long distance in any direction.
- iv. It is an important ecological habitat and spawning ground for many aquatic species.
- v. There is a potential health hazard to bathers & children from polluted outflow due to stagnant water from the Drainage Ditch (which is virtually flat), hydrocarbons from road/car parking areas, rubbish collecting in the ditch etc. The River Trent water level was recorded by Crest Nicholson on 15 June 2020 as being 51.280m AOD. This is above the Invert Level of the outfall i.e. 51.230m AOD. This means that water in the Drainage Ditch has got to be above the River Trent water level in order to open the non-return valve on the outfall. Accordingly, there are going to be long periods when the non-return valve is closed and hence upstream water in the “flat” Drainage Ditch will stagnate. The periodic release of this when River Trent water levels and/or development site Surface Water run-off allow, will be a potential health hazard.
- vi. There was no mention/reference to any disturbance of The Beach in the Public Inquiry and the Secretary of State’s Decision thereon 13 February 2017.
- vii. Public opinion was galvanised by an octogenarian lady who has lived in the Village for over 60 years and was so incensed by the proposals at The Beach that she organised a Protest, which was well attended by over sixty Villagers on Saturday 12 June 2021.

In summary, “The Crest Nicholson UNAPPROVED Alignment” is shorter and cheaper than “The Crest Nicholson Approved Alignment” but causes considerable impact on the local beauty spot, “The Beach”, which has been enjoyed by generations of Villagers over the years, in particular during the COVID-19 pandemic.

Question:

- a) It is believed that for marginally extra cost over “The Crest Nicholson UNAPPROVED Alignment”, (but considerably less than “The Crest Nicholson Approved Alignment”) an alternative alignment is possible by chicaning the last 75 to 100m through an existing gap in the hedgerow into the adjacent field to the east

and discharging into the River Trent some 75m to the east, and downstream of The Beach. Can this be considered?

- b) The MicroDrainage calculations (recently submitted but dated 21 November 2018) appear to show that for the 1 year, 30 year and 100 year storm return periods, the flows into the River Trent will be 277.6, 314.9 and 396.8 litres per second respectively.

This would appear to be in contravention of the Planning Condition limiting discharge to 17.8 litres per second. Can this be explained please?

8. Floodplain Compensation:

The floodplain compensation areas are as follows:

Drawing Number P18-336:01 C7
North of the Infiltration Basin
Base Level 53.650m AOD

Drawing Number P18-336:01 C7
Adjacent to Plot 108
Base Level 53.700m AOD

Drawing Number P18-336:06 C7
Adjacent to Plot 121
Base Level 53.175m AOD

Drawing Number P18-336:07 C7
Bisected by the Drainage Ditch
Base Level 53.300m AOD

Questions:

- a) Why is the Base Level of the first two of these areas above the River Trent 1 in 100 year flood level of 53.400m AOD?
- b) The Base Level of the last two of these areas is only marginally below the River Trent 1 in 100 year flood level of 53.400m AOD. Will there be an as built survey carried out to demonstrate that the floodplain compensation has been achieved? If not, how is the floodplain compensation being validated?

9. Maintenance of Roads, Paved Areas and Surface Water Sewers:

It would appear that significant amounts of the roads, paved areas and the Surface Water Sewers will not be built to adoptable standards or will not be applicable to adoption criteria. These un-adopted features contribute to the functionality of the SWS in severe rainfall events when the River Trent is in flood. Accordingly, the protection against flooding for existing properties to the south of the development will be the remit of an Estates Managing Agent. It is unclear how this entity will be

funded, its contractual relationship with the new property owners and how long it will exist. This would appear to make existing residents vulnerable as the Estate Managing Agent will not be accountable to these residents. This is not an acceptable situation.

Question:

- a) It is unclear how this entity will be funded, its contractual relationship with the new property owners and how long it will exist. This would appear to make existing residents vulnerable as the Estate Managing Agent will not be accountable to these residents. Can the arrangements be clarified?

PART B - BIODIVERSITY AND BOUNDARY TREATMENT:

10. Biodiversity offsetting and Alrewas Footpath 51, Dark Lane:

Planning Application 18/01491/FULM Condition 11 states: *"The development shall be carried out in accordance with the biodiversity offsetting scheme (Biodiversity Impact Assessment and Habitat Management Plan' produced by Ecolocation dated September 2017) approved under discharge of condition application 13/01175/DISCH1 (13/01175/FUL) dated 13th December 2017, unless otherwise first agreed in writing by the Local Planning Authority by the submission and approval of revised details."*

On page 10 of the "Biodiversity Impact Assessment and Habitat Management Plan" in relation to the Wildflower Meadow, it states - *"Timetable of Management Works: Management activities will commence in the first year of commencement of the development scheme."* i.e. August 2019.

It goes on to state that the Year 1 activities are as follows: Harvest any remaining crop, Deep plough/harrow to break up ground, Allow weeds to grow, Contact herbicide to kill new weed shoots, Sow seeds & fence area. To my knowledge, none of this was done in 2019 or 2020. In addition, the Year 2 activities have not been commenced.

The Wildflower Meadow, according to the report, makes the development into a biodiversity net gain. The current position is that habitat and species were lost in 2019 and hence the development is a biodiversity net loss. With the gap in loss and creation of biodiversity, the report recommendations require updating.

There is also a school of thought that a Wildflower Meadow on the nutrient rich River Trent Flood Zone 2 will not work, i.e. wildflowers (nutrient deficient lovers) being overtaken by nutrient loving nettles, docks., etc. This would result in the development having a biodiversity net loss.

It is also noted that the proposals for the Alrewas Footpath 51, Dark Lane, northern hedgerow is unclear.

It is also noted that the Arboricultural Officer is questioning various aspects of the landscaping.

Questions:

- a) It is considered that the proposals and associated calculations within the "Biodiversity Impact Assessment and Habitat Management Plan" have been superseded. Can the net impact on biodiversity as a result of the development be recalculated and measures put in place to ensure the Public Inquiry edict of it needing to be a net gain, be confirmed?
- b) What Drawings have been approved regarding the Alrewas Footpath 51, Dark Lane, northern hedgerow? If no drawings have been approved, can the work be

stopped until the nature and extent of the hedgerow removal has been approved?

There is also an issue regarding emergency vehicle access to properties in Dark Lane, which has been caused by potential encroachment of the development onto the Alrewas 51 Footpath, Dark Lane. What drawings have been approved relating to this section of the development?

11. Conclusion:

This Report is a synopsis of the content of Objections submitted over the last 15 months regarding Planning Application 20/00359/FULM. It is hoped that all those involved in the decision-making process regarding this Planning Application can be made aware of Villagers' views and that this Report forms the basis of additional enquiries/clarifications so that decision are made on the most comprehensive information as possible.

The Objections submitted to date contain considerably more information than can be accommodated in this Report and it is hoped that future dialogue ensures that all information reaches the relevant interested parties.