

From: publicaccess@lichfielddc.gov.uk
Sent: 15 March 2021 18:08
To: jwalton467@btinternet.com
Subject: Comments for Planning Application 20/00359/FULM

Mr John Edward Walton,

You have been sent this email because you or somebody else has submitted a comment on a Planning Application to your local authority using your email address. A summary of your comments is provided below.

Comments were submitted at 6:08 PM on 15 Mar 2021 from Mr John Edward Walton.

Application Summary

Address: Land North Of Dark Lane Alrewas Burton Upon Trent
Staffordshire

Proposal: 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

Case Officer: Vanessa Morgan
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Customer Details

Name: Mr John Edward Walton
Email: jwalton467@btinternet.com
Address: 56 Park Road, Alrewas, Burton Upon Trent,
Staffordshire DE13 7AJ

Comments Details

Commenter Type: Member of public
Stance: Customer objects to the Planning Application

Reasons for comment:

Comments: Further to my Objection submitted on 07 March 2021, I wish to add the following:

- 1) Hydrogeological Assessment - Narrative:
 - a. The Hydrogeological Assessment (hereafter called the Report) refers to a "Technical Note" being prepared and submitted to the SCC LLFA. It is unclear if this is the document posted on the LDC Planning Portal under Planning Application 20/00359/FULM or a separate document. If the latter, then some of the comments below may be clarified therein. In addition, can the Technical Note be posted on the LDC Planning Portal?
 - b. Drawing Numbers P336-001 Rev C6 and P336-005 Rev C9 have not been published on the LDC Planning Portal. Can they be posted on the LDC Planning Portal?
 - c. There is reference to groundwater levels being recorded from Boreholes in January/February 2018 and June/July

2019. These have not been published on the LDC Planning Portal nor have they been mentioned in numerous exchanges with LDC Planning Services and SCC LLFA. (Geoenvironmental Assessment, Dark Lane, Alrewas, Report No 17178/1 dated February 2018 by Georisk Management.) Can this be posted on the LDC Planning Portal?

d. The Report identifies that there is some confusion in the design as to whether the Infiltration Basin (to the west of the site) is intended to allow infiltration to the adjacent ground or is intended to attenuate and temporarily store water within the SWS system.

e. The Report, similarly identifies some confusion as to whether the Infiltration Blanket to the east of the site is designed to directly collect rainwater and discharge into the SWS system or is designed to discharge water to the adjacent ground. Maybe both.

f. The Report states that the alluvial clays, sands, silts and gravels associated with the River Trent will isolate the groundwater in the sands and gravels under the site from the River Trent. This is contested as the Drainage Ditch breaches this isolating strata, as does the River Trent when in flood by overtopping this strata. Also, site observations appear to contradict this.

g. The results of Soakaway Tests show a design permeability of 1.7 metres per day. NB CEMEX for the Aggregate extraction at Orgreave state hydraulic conductivity of 17 to 553 metres per day and have progressed calculations using 100 metres per day.

h. The Geoenvironmental Assessment referred to in b) above appears to record groundwater levels at six locations on 17/01/2018, 29/01/2018 and 12/02/2018. Additionally, data specific to BH1 (i.e. near the Infiltration Basin) was recorded between 07/06/2019 and 10/07/2019. According to the Met Office there were no "Past Weather Events" during these periods.

<https://www.metoffice.gov.uk/weather/learn-about/past-uk-weather-events> It is also noted that during the June/July 2019 recording, a dip occurred which was explained by the possibility of groundwater abstractions, for general farming and spray irrigation purposes, drawing down the groundwater level. As these are some 500 metres away, it would appear to contradict the previous argument that flow within the groundwater is slow.

i. The Report identifies a Hydraulic gradient across the site from west to east and goes on to state that the Drainage Ditch will become a dominant control on groundwater levels due to the high permeability and will reduce groundwater levels. This is the case if the Drainage Ditch is empty but the scenario that concerns the Village is when the Drainage Ditch is at the River Trent Flood level and hence using the argument in the Report regarding high permeability, will cause the groundwater to rise.

j. The Report makes no reference to the coincident River Trent 1 in 100 years plus 20% for Climate Change and the Severe Rainfall event of 1 in 100 years plus 30% for Climate Change.

k. The Report makes no reference to the River Trent flooding events that occurred in October 2019 and February/March 2020 (Storms Ciara and Dennis.)

l. The Report makes no reference to groundwater levels encountered by Crest Nicholson/Chasetown Civil

Engineering (whilst carrying out drainage and ground works) and Severn Trent (carrying out the FWS connection to the Dark Lane Pumping Station).

2) Hydrogeological Assessment - Responses to the SCC LLFA "questions":

a. In responding to the SCC LLFA "Questions", the following can summarise:

i. (2.6.1) Yes, the groundwater will enter the SWS system via the Infiltration Basin and the Infiltration Blanket.

AGREE.

ii. (2.6.2) No, the groundwater will not impact on the SWS system as it will flow under gravity and discharge.

DISAGREE - The groundwater cannot leave the SWS system as the non-return valve (flap valve) will prevent this when it is closed by the River Trent in flood.

iii. (2.6.4) Talks about the risk of groundwater emerging at the surface causing flooding.

This has never been argued. The Report appears to misunderstand that the risk of flooding causing concern to the Village is when the SWS system has no discharge point (flap valve closed) and the SWS system being unable to accommodate what could be several weeks of rainfall, including the 1 in 100 years rainfall event plus 30% for Climate Change. RESPONSE IS IRRELEVANT.

3) Hydrogeological Assessment - Recommendations (Mitigation):

a. Notwithstanding the comments above, the Report recommends:

i. The Infiltration Basin should be sealed off from the groundwater by lining it with a low permeability welded geomembrane weighted down with stone or similar to prevent it heaving (presumably from rising groundwater).

ii. The Infiltration Blanket should be sealed off from the groundwater by removing the gravel blanket and replacing it with a geomembrane wrapped underground crate system.

4) Hydrogeological Assessment - Implementation of recommendations:

a. It is not stated anywhere on the LDC Planning Portal that Crest Nicholson has accepted the above recommendations

b. If the recommendations are included in a Planning Condition, what guarantee has the Village got that Crest Nicholson will implement them?

c. The Infiltration Basin recommendation has problems due to the potential build-up of debris and the associated requirement to clean it out, causing integrity issues with the liner. Also, it is likely to have stagnant water in it for large periods of the year. The Infiltration Basin will become an attraction to children and a danger due to its soft base.
- ACCORDINGLY, THIS WOULD NOT APPEAR TO BE AN ACCEPTABLE SOLUTION.

d. The Infiltration Blanket recommendation will entail the excavation of a 500 square metre hole approximately 1.7 metres deep, i.e. some 850 cubic metres, and associated landscape removal - right outside the Show Home. There is little option on site for disposal/reuse due to the advanced nature of the development and the protection of the floodplain. Accordingly, it will most likely need carting off

site. The geomembrane wrapped underground crate storage system would then need to be installed and covered/landscaped over. ACCORDINGLY, THIS COULD BE A HIGHLY UNLIKELY OPTION TO BE PURSUED.

e. Whatever arrangements are approved for these two Storage Structures, the volume of storage needs inputting into the overall capacity calculation for the period that the flap valve is closed.

5) Groundwater/SWS System scenario that causes concern for the Village:

a. The scenario that causes concern is as follows:

i. River Trent goes into flood and causes the flap valve on the SWS system outfall to close.

ii. Groundwater enters the SWS system via the Infiltration Basin and the Infiltration Blanket and cannot discharge, hence reducing storage capacity in the SWS system. IF THE REPORT'S RECOMMENDATIONS ARE IMPLEMENTED, THIS HAS BEEN ADDRESSED.

iii. Rainwater falls during the period, which could be weeks, that the flap valve is closed, filling up the SWS system.

iv. If the SWS system becomes inundated, particularly in the event of the 1 in 100 years plus Climate Change rainfall event, then the water within the SWS system can only discharge in one of three ways:

1. Via the flap valve if sufficient hydraulic head is achieved and flow time allows.

2. Via the road gullies adjacent to Micklehome Drive

3. Flow over the surface of the development using whichever route gravity takes it. This is likely to head south into Micklehome Drive, Selwyn Close and Dark Lane properties.

v. There is no modelling of items iii) and iv) posted on the LDC Planning Portal.

6) Drainage Ditch and NTS Gas Pipeline Crossing:

a. The timeline of events is as follows:

i. Flood Frisk Assessment & Drainage Strategy (FRA&DS) prepared by Atkins in September 2013 in para 3.3.2 states: " There is a high pressure gas main running through the site from south-east to north-west. This does not pass through the area of the site proposed for development.

ii. Crest Nicholson / Simpson Drawing P18-336-07 T6 dated September 2018 shows the levels on the Drainage Ditch as it heads towards the River Trent, crossing the NTS Gas Pipeline.

iii. Whilst walking across the fields in April 2020, I noticed marker pegs at the crossing point of the Drainage Ditch and the NTS Gas Pipeline.

iv. Subsequent interpolation of the levels indicated that there may be a conflict.

v. I brought this to the attention of Claire Billings in LDC Planning Services on 20 April 2020

vi. Enquiries to National Grid Gas Transmission plc clarified that the marker pegs that I had seen were as a result of a Trial Hole dug in 2019, where I understand, the Developer was represented.

vii. In June 2020 Crest Nicholson commissioned a Ground Penetrating RADAR Survey along the Gas Pipeline.

viii. In July 2020 Crest Nicholson / Simpson posted Drawing P18-336:SK40 which showed that if the Drainage

Ditch was moved west, it would not conflict with the as Pipeline. This route now includes a an outfall in the vicinity of the Beach.

- ix. In October 2020 Crest Nicholson / Simpson posted Drawing P18-336:SK49 which now showed that there was a conflict and introduced an Inverted Siphon solution.
- x. In February 2021 Crest Nicholson / Simpson posted Drawing P18-336:SK131 which showed a different solution.
- xi. None of the postings by Crest Nicholson have confirmed that neither National Gris Gas Transmission plc or Cadent Gas Limited have approved the design, detail, specification, methodology or contractor.
- b. This is a critical constraint and it is unbelievable that a solution is not approved by National Grid or Cadent at this stage.
- c. The Drainage Ditch in all proposals is so flat that there will inevitably be maintenance issues.
- d. In an attempt to assist, I have suggested, without prejudice, that the Drainage Ditch be replaced with a piped solution, and the flap valve be relocated from the boundary of the development to the bank of the River Trent. This eradicates maintenance issues and offers additional storage when the flap valve is closed.

7) Others matters:

- a. Whilst the above deals with the latest postings on 05 March 2021, it may be timely/prudent to raise the following:
 - i. What is the progress on resolving the Objections/Clarifications raised by APC/ARG, individual Villagers, Arboricultural Officer, Environment Agency, SCC Flood Risk Officer, LDC Spatial Policy & Delivery, Severn Trent, LDC Conservation Officer, SCC Highways, many of which are complimentary to each other.
 - ii. The Planning Application 20/00359/FULM was submitted on 04 March 2020 in respect of "Variation of condition 2 relating to approved plans and variation of condition 9 relating to landscaping of application 13/01175/FULM". Subsequently, this Application has grown and expanded into many other areas and after over twelve months has still not been concluded. The Village deserves an explanation of what is going on, particularly as the three-year build period, which commenced on 15 July 2019, is now well over half way through.



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